



November 8, 2023

Evette Cullen
Nevada Department of Health and Human Services
Division of Health Care Financing and Policy
Medical & Dental Programs
1100 E. William Street, Suite 10
Carson City, NV 89701

RE: Nevada Medicaid Coverage of Certain Reimbursement Codes for Speech-Language Pathologists

Dear Ms. Cullen:

On behalf of the American Speech-Language-Hearing Association (ASHA) and the Nevada Speech-Language-Hearing Association (NSHA), I respectfully write to follow up on your August 24, 2022, letter to ASHA regarding adding the following Current Procedural Terminology (CPT®) codes to *provider type (PT) 34 Therapy, specialty 29 Speech Pathologist, and specialty 219 Speech Pathologist (Language)*: 92612 (Flexible fiberoptic endoscopic evaluation of swallowing by cine or video recording (FEES)); 92511 (Nasopharyngoscopy with endoscope); and 31579 (Diagnostic laryngoscopy with stroboscopy). We also wish to discuss raising Medicaid reimbursement rates across all covered services for speech-language pathologists in the outpatient setting (*PT34*) to be commensurate with those of school-based speech-language pathologists (*PT60*).

ASHA is the national professional, scientific, and credentialing association for 228,000 members and affiliates who are audiologists; speech-language pathologists (SLPs); speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students. NSHA is the professional state organization for audiologists and SLPs whose mission is to provide continuing education credits (CEUs) to members, educate the public about the profession, lobby for legislation that impacts the professions, and provide a network of students, clinicians, and educators in their fields.

Reimbursing Speech-Language Pathologists for Certain CPT Codes

The Nevada Department of Health and Human Services (Department) acknowledged in its August 2022 letter that the endoscopy-related CPT codes (mentioned above) are already part of the Medicaid fee schedule for physicians, osteopaths, advanced practice registered nurses, and physician assistants. Since they are already populated on the fee schedule, adding them is unnecessary. In addition, the Department acknowledged that these CPT codes are within the scope of practice for an SLP. However, the Department noted that it cannot add these codes to the requested provider types because of budgetary constraints.

We understand the Department has significant budgetary restrictions and, as such, we are also pursuing legislatively appropriated budgetary funding for these requests. **We urge the Department to allow SLPs to bill these CPT codes by adding them to the *PT34* fee schedule as part of the budget build beginning in Spring 2024**, which was also cited in the August 2022 letter. As acknowledged, SLPs can perform these services as part of their scope. Adding these codes to the *PT34* fee schedule would help eliminate a critical gap in access.

NSHA members report that Nevada physicians simply do not provide these services and refer them to SLPs; however, since SLPs unable to bill for them, the services are either absorbed in small doses by larger facilities or not provided at all.

Establishing Commensurate Reimbursement Rates Across Settings

ASHA and NSHA respectfully request payment parity across work settings for SLPs.

There is a significant difference between payment rates for certain services provided in health care settings vs. services provided in schools, specifically *PT34 Therapy* for outpatient settings compared to *PT60 School Health Services*. This information is demonstrated in the fee schedules for both provider types on the Division of Health Care Financing Policy fee schedule website at <https://dhcfp.nv.gov/Resources/Rates/FeeSchedules/>.

For example, CPT code 92507 is one of the most commonly billed codes by an SLP and is used to report treatment of speech, language, voice, communication, and/or hearing processing disorder. In the school setting, that code is reimbursed at \$70.25. In the outpatient setting, it is reimbursed at \$63.64. These are the same services offered by the same type of health providers but delivered in different settings. A difference of \$6.61 may seem inconsequential, but when stacked over an episode of care for one patient, and then multiplied by the number of patients that each provider sees, it is a serious difference in reimbursement rates.

Another example of a code with a significant discrepancy is CPT code 92609, which is used to report a therapy service for the use of speech-generating devices, with programming. In the school setting, that code is reimbursed at \$98.51. In the outpatient setting, it is reimbursed at \$89.24. With an almost \$10 difference in reimbursement for the same services in different settings, *PT34* SLPs perform the same services but receive less reimbursement for them because of the setting in which they are delivered.

Ultimately, lower rates for *PT34* create an access to care issue. Lower reimbursement for *PT34* makes it more difficult for small businesses to survive while providing the same high-quality services that are provided in the schools by the same or similarly licensed individuals. Ensuring commensurate rates for services across settings enables Medicaid beneficiaries to have access to the services they need in the settings where they identify that they need them the most.

Thank you for considering ASHA's and NSHA's request to add these codes to the fee schedule for SLPs and to increase the reimbursement rates for *PT34* to be commensurate with those afforded to *PT60*. ASHA and NSHA would welcome the opportunity to discuss these requests further. If you or your staff have any questions, please contact Caroline Bergner, ASHA's director of health care policy for Medicaid, at cbergner@asha.org.

Sincerely,



Robert M. Augustine, PhD, CCC-SLP
2023 ASHA President



Adrienne Pearson, CCC-SLP
2023 NSHA President

cc: Senator Fabian Donate, Chair of the Interim Health Committee
Assemblyman Dr. David Orentlicher, Vice Chair of the Interim Health Committee

Appendix A: February 28, 2022, Letter to NDHHS RE: Nevada Medicaid Coverage of Certain Reimbursement Codes for Speech-Language Pathologists

Appendix B: August 24, 2022, Letter to ASHA RE: Nevada Medicaid Coverage of Certain Reimbursement Codes for Speech-Language Pathologists



June 21, 2024

Re: Public Comment for the Patient Protection Commission Meeting

To Whom It May Concern,

Thank you for the opportunity to make a public comment. My name is Shawna Ross. I am a speech-language pathologist and pediatric private practice owner of 18 years in Northern Nevada. I also serve as the State Advocate on Reimbursement for Medicaid and Private Insurance for the Nevada Speech-Language Hearing Association (NSHA). First, as a quick mention, NSHA is actively working with legislators on a bill so that Nevada can join the Interstate Compact for licensure for Speech-Language Pathologists and Audiologists (<https://aslpcompact.com/>). More directly, I am here to make a comment regarding speech-swallowing codes that are not being reimbursed through Nevada Medicaid. The following CPT codes are currently reimbursed at \$0: 92612 (Flexible fiberoptic endoscopic evaluation of swallowing/FEES), 92511 (nasopharyngoscopy with endoscope), and 31579 (diagnostic laryngoscopy with stroboscopy). It is our understanding that these codes are included in the Medicaid fee schedule but are reimbursed at \$0 for Speech-Language Pathologists. Physicians will be reimbursed for these codes; however, it is reported in Southern and Northern Nevada that physicians are not completing these procedures which is presenting a barrier to care. It is also difficult to recruit/employ a robust workforce when receiving payments of \$0 for the highly skilled work. These codes are within the scope of practice for Speech-Language Pathologists and are reimbursed under other insurance plans. With the written comment, I have included a joint letter that was submitted to Medicaid on November 8, 2023 by the American Speech-Language Hearing Association (ASHA) and NSHA. We ask that legislators support these requests in the budget and with any policy changes needed in the 2025 session. We are happy to provide any additional information and look forward to hearing how we can continue to advocate for these changes. We appreciate the consideration.

Sincerely,

Shawna Ross, M.S., CCC-SLP
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