

February 28, 2022

Suzanne Bierman
Administrator
Division of Health Care Financing and Policy
Nevada Department of Health and Human Services
1100 East William Street, Suite 101
Carson City, NV 89701

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

Ms. Bierman:

On behalf of the American Speech-Language-Hearing Association and the Nevada Speech-Language-Hearing Association, we write respectfully to request that the Nevada Medicaid program reimburse speech-language pathologists for use of the following Current Procedural Terminology (CPT®) codes: 92612 Flexible fiberoptic endoscopic evaluation of swallowing by cine or video recording (FEES); 92511 Nasopharyngoscopy with endoscope; and 31579 Diagnostic laryngoscopy with stroboscopy. We further ask the Medical Care Advisory Committee (MCAC) to add discussion of these codes to their agenda for discussion and review. The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 223,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. There are over 970 ASHA members who reside in Nevada.¹ The Nevada Speech-Language-Hearing Association (NSHA) is the professional state organization for speech-language pathologists and audiologists 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.

The flexible fiberoptic endoscopic evaluation of swallowing (FEES) procedure may be completed in an outpatient clinic or at a patient's bedside by passing an endoscope through the nose.² FEES is used without concerns of radiation exposure and can be used within therapeutic contexts and for diagnostic therapy to assess current progress and effectiveness of swallowing therapy.³ SLPs do not require special certification to perform instrumental assessments. Like all distinct procedures, SLPs with appropriate training and competence in performing FEES are qualified to use this procedure independently for the purpose of assessing swallowing function and related functions of structures within the aerodigestive tract.⁴

Nasopharyngoscopy with endoscope is a diagnostic procedure used for examining the nose, throat, and airway.⁵ A scope is inserted through the nose and slowly advances to the back of the throat where pictures are taken. During a diagnostic laryngoscopy with stroboscopy, the provider is viewing the vocal fold vibrations by using high speed flashes of light timed to the patient's voice frequency.⁶ Photos are taken to show the vibration of vocal folds during sound production, a critical aspect of voice function.⁷

The Nevada Practice Act does not require physician supervision of SLPs while performing these services or any others within their scope of practice.⁸ Forty-five states recognize these services

as within the scope of practice for speech-language pathology and does not require physician supervision.

Many state Medicaid programs include coverage of these codes. The Medicaid programs in Colorado, Utah, and California cover FEES provided by SLPs. California's Medicaid program also covers nasopharyngoscopy with endoscope.^{9,10,11}

In June 2011, Dr. Don Berwick, then Director of the Centers for Medicare & Medicaid Services (CMS), acknowledged that "while physicians perform these diagnostic procedures, speech pathologists also perform these procedures to evaluate and treat a patient's functional/use problems."¹² Dr. Berwick's correspondence removed all supervision levels previously assigned to the procedures. Thus, CMS declared that SLPs were qualified to perform these services.

The importance of covering the above mentioned codes for SLPs cannot be underscored enough. These procedures are important for determining a patient's swallowing and voice abilities and/or assessing therapeutic progress. These codes are on the Nevada Medicaid physician fee schedule and populated with values there. Given that these procedures are part of the scope of practice for speech-language pathology and there is no physician supervision requirement, it is appropriate that Nevada include these codes on the Medicaid fee schedule for SLPs

Thank you for considering ASHA's and NSHA's request to add these codes to the fee schedule for SLPs. ASHA and NSHA would welcome the opportunity to discuss further at the upcoming MCAC meeting or at a separate time. 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,



Judy Rich, EdD, CCC-SLP, BCS-CL
2022 ASHA President



Kim Reddig, MS, CCC-SLP
NSHA President

¹ American Speech-Language-Hearing Association. (2020). *Nevada* [Quick Facts] <https://www.asha.org/siteassets/uploadedfiles/nevada-state-flyer.pdf>.

² American Speech-Language-Hearing Association. (n.d.). *Flexible Endoscopic Evaluation of Swallowing*. <https://www.asha.org/practice-portal/clinical-topics/pediatric-feeding-and-swallowing/flexible-endoscopic-evaluation-of-swallowing/>.

³ Ibid

⁴ Ibid

⁵ Rady Children's Hospital San Diego. (n.d.). *Speech Endoscopy Clinic* <https://www.rchsd.org/programs-services/otolaryngology/specialty-programs-and-clinics/speech-endoscopy-clinic/>.

⁶ The Voice Foundation. (n.d.). *Overview of Diagnosis*. <https://voicefoundation.org/health-science/voice-disorders/overview-of-diagnosis-treatment-prevention/laryngoscopystroboscopy/>.

⁷ Ibid

⁸ Nevada State Legislature. (2018). *NAC-637B*. <http://www.leg.state.nv.us/NAC/NAC-637B.html>.

⁹ Colorado Department of Health Care Policy & Financing. (2020). *Speech-Therapy Manual*. <https://hcpf.colorado.gov/speech-therapy-manual>.

¹⁰ Utah Department of Health: Medicaid. (2020). *Coverage and Reimbursement Fee Schedule Download*. <https://health.utah.gov/stplan/lookup/FeeScheduleDownload.php>.

¹¹ Government of California. (n.d.). *Medi-Cal rates Information*. https://files.medi-cal.ca.gov/Rates/rates_information.aspx?num=21&first=87850&last=94772.

¹² American Speech-Language-Hearing Association. (2011). Medicare Repeals Endoscopy Rules. <https://leader.pubs.asha.org/doi/10.1044/leader.PA1.16092011.1>.