



June 25, 2020

Margaret Wilson
Division of Medicaid
550 High Street Suite 10000
Jackson, MS 39201

RE: Title 23: Medicaid, Part 225, Chapter 1, Rules 1.1-1.7

Dear Ms. Wilson:

On behalf of the American Speech-Language-Hearing Association, I write to comment on the Division of Medicaid's proposed changes to Title 23, Part 225, Chapter 1, Rules 1.1-1.7, which alter the state's coverage policies for telehealth under the Mississippi Medicaid program. While the state's proposed rule changes help clarify reimbursement policies and ensure greater access to audiology and speech-language pathology services during a declared public health emergency, the rules could be improved by expanding telehealth coverage during non-emergency operations.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 211,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 1,800 ASHA members reside in Mississippi.¹

As the leading national organization for the certification and advancement of audiologists and speech-language pathologists, ASHA supports the development and use of telemedicine, telepractice, and telehealth. ASHA maintains a collection of professional practice documents, including a position statement that defines telepractice as "the application of telecommunications technology to deliver professional services at a distance by linking clinician to client or clinician to clinician for assessment, intervention, and/or consultation."²

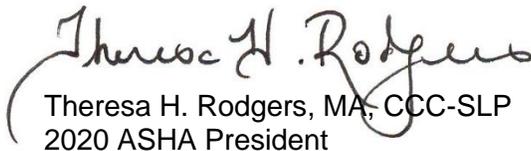
ASHA strongly supports the use of telehealth. Research demonstrates the equivalence of telehealth to in-person service delivery for a wide range of diagnostic and treatment procedures for adults and children.³ Studies have shown high levels of patient, clinician, and parent satisfaction supporting telehealth as an effective alternative to the in-person model for delivery of care.⁴ Telehealth expands practitioners' availability to those in need—regardless of geographic location—saving time and resources for both the provider and the patient.

Despite proven benefits, telehealth remains underutilized within audiology and speech-pathology practices due to a lack of clear state laws governing its use or mandating appropriate reimbursement for services delivered. While the Division of Medicaid's proposed rule changes would help address underutilization by enabling audiologists, speech-language pathologists, and other distant site providers to be reimbursed for telehealth during a declared emergency, the rules omit reimbursement for these services during non-emergency operations. The state's proposal excludes audiologists and speech-language pathologists from the list of eligible distant site providers, a list which includes physicians, physician assistants, nurse practitioners, psychologists, social workers, professional counselors, and behavior analysts. Audiology and

speech-language pathology services are just as critical to Mississippians as those provided by other professions and are often provided in concert with other medical services as part of an interprofessional practice (IPP) team. To remedy this disparity, ASHA recommends adding audiologists and speech-language pathologists to the list of eligible distant site providers under Rule 1.3(B).

Thank you for your consideration of ASHA's position regarding the proposed rules. If you or your staff have any questions, please contact Tim Boyd, ASHA's director of state health care and education affairs, at tboyd@asha.org.

Sincerely,



Theresa H. Rodgers, MA, CCC-SLP
2020 ASHA President

¹ American Speech-Language-Hearing Association. (2020). *Mississippi* [Quick Facts].

<https://www.asha.org/uploadedFiles/Mississippi-State-Flyer.pdf>

² American Speech-Language-Hearing Association. (n.d.). *Telepractice*. <http://www.asha.org/Practice-Portal/Professional-Issues/Telepractice/>.

³ Grogan-Johnson, S., Alvares, R., Rowan, L., & Creaghead, N. (2010). A pilot study comparing the effectiveness of speech language therapy provided by telemedicine with conventional on-site therapy. *Journal of Telemedicine and Telecare*, 16, 134–139.

⁴ Ibid.