



March 11, 2020

Carolyn Cunningham, MD, Contract Medical Director  
Laurence Clark, MD, Medical Director  
National Government Services, Inc.  
LCD Comments  
P.O. Box 7108  
Indianapolis, IN 46207-7108

Dear Drs. Cunningham and Clark:

On behalf of the American-Speech-Language-Hearing Association, I write regarding appropriate coding for dysphagia services provided by speech-language pathologists as outlined in the local coverage determination L33580 (Speech-Language Pathology) and associated coverage article (A52866).

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.

The local coverage determination L33580 states that it includes swallowing and dysphagia services, but there is no guidance outlined related to dysphagia evaluation and treatment within the article. In addition, the associated coverage article does not include any of the current procedural terminology (CPT)<sup>®</sup> codes that represent dysphagia evaluation and treatment. These codes include 92526, 92610, 92611, and 92612. The article also states that the diagnosis codes for dysphagia (R13.0, R13.10, R13.11, R13.12, R13.13, R13.14, and R13.19) should be billed with CPT codes that are not associated with dysphagia evaluation and treatment such as CPT code 92507.

Consequently, ASHA recommends the inclusion of the following CPT codes in the coverage article for speech-language pathology:

- 92526
- 92610
- 92611
- 92612

ASHA also recommends that the National Government Services update the article to reflect the need to accurately report diagnosis codes associated with dysphagia, when billing the dysphagia evaluation and treatment codes listed above.

Thank you for your consideration of this request. Please contact Sarah Warren, MA, ASHA's director of health care policy, Medicare, at [swarren@asha.org](mailto:swarren@asha.org).

Sincerely,

A handwritten signature in black ink that reads "Theresa H. Rodgers". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

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