

Qualifications for Speech-Language Pathologists Providing Outpatient Speech-Language Pathology Services

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Implementation Date: April 18, 2025	Related CR Transmittal Number: R13051BP
Related CR Title: Qualifications for Speech-Language Pathologists Furnishing Outpatient Speech-Language Pathology Services	

Affected Providers

Speech-language pathologists (SLPs) who directly bill Medicare Administrative Contractors (MACs) for their services and institutional providers who bill for the outpatient therapy services provided by SLPs working for them.

Action Needed

Make sure your billing staff knows about updates to the <u>Medicare Benefit Policy Manual, Chapter 15</u>, section 230.3 to match the regulatory provision for the qualifications of SLPs providing outpatient therapy services.

Background

To create consistent requirements in the CY 2005 Medicare Physician Fee Schedule final rule, CMS recognized personnel qualifications applicable to home health agencies (HHAs) at <u>42 CFR 484</u> as applicable to all outpatient:

- Physical therapy (PT) services
- Occupational therapy (OT) services
- SLP services





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We revised <u>42 CFR 410.62(a)</u> to require SLPs to meet the requirements at 42 CFR 484.4 as a condition for outpatient SLP service payment and coverage. Since 2005, our outpatient therapy regulations for all therapists—PTs, OTs, their supervised assistants, and SLPs—have matched personnel requirements for therapists working in HHAs, per 42 CFR 484.

In the CY 2015 Home Health Prospective Payment System final rule, we revised SLP personnel requirements at 42 CFR 484 to match those for an SLP in section 1861(II)(4)(A) of the <u>Social Security Act</u> effective January 1, 2015. This revision resulted from the public informing us that the regulatory SLP qualifications enforced at that time impeded SLPs' ability to practice.

In the January 2017 HHA conditions of participation final rule, we redesignated 42 CFR 484.4 to 42 CFR 484.115. We also revised 42 CFR 410.62(a) to reflect that an SLP providing outpatient SLP services must meet requirements found at 42 CFR 484.115.

Effective January 1, 2015, a qualified SLP must have a master's or doctoral degree in SLP and meet either of these requirements:

- Be licensed as an SLP by the state in which they provide services
- In the case of a person who practices in a state that doesn't license SLPs, they must have:
 - Successfully completed 350 clock hours of supervised clinical practicum (or be in the process of accumulating supervised clinical experience)
 - Performed at least 9 months of supervised full-time SLP services after obtaining a master's or doctoral degree in SLP or a related field
 - Successfully completed a national examination in SLP approved by the HHS Secretary

Medicare Benefit Policy Manual, Chapter 15, section 230.3 shows the revised SLP requirements. CR 13922 contains no new policy.

More Information

We issued CR 13922 to your MAC as the official instruction for this change. For more information, find your MAC's website.

Document History

Date of Change	Description
May 23, 2025	Initial article released.

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