



July 12, 2024

Lou Gianquinto
President
Anthem Blue Cross and Blue Shield Connecticut
108 Leigus Rd
Wallingford, CT 06492

Re: Anthem CT Changes to Payment Structure for PT, OT, and ST

Dear President Gianquinto and colleagues:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to respectfully request clarification and express concern about the recent notification of changes to the Anthem Blue Cross and Blue Shield Connecticut (Anthem CT) payment structure for physical therapy (PT), occupational therapy (OT), and speech therapy (ST).¹

ASHA is the national professional, scientific, and credentialing association for 234,000 members, certificate holders, and affiliates who are audiologists; speech-language pathologists (SLPs); speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students.

The July 1, 2024, announcement indicates that Anthem CT is moving from a fee-for-service model to a per-diem (per day), flat-rate system for PT, OT, and ST services. Although Anthem calls this a “flat-rate” system, the announcement also states that providers will receive “*up to* an \$80 daily per diem,” which implies that this is a payment cap. **ASHA is requesting clarification if this is an \$80 flat-rate for each visit or a payment cap of up to—but potentially less than—\$80 based on the Current Procedural Terminology (CPT®) code billed. It is also unclear whether the payment amount is for PT, OT, and ST combined each day or if it is a separate cap for each specialty.**

ASHA is extremely concerned with the daily payment cap, which is a substantial decrease in payment for speech-language pathology evaluation and treatment services from Anthem CT. Based on the information provided in the announcement, SLPs could face a significant reduction in payment while continuing to experience high inflation costs. For example, the Medicare Economic Index expected a 4.6% inflation of medical practice costs in 2024 alone.² Providers are already experiencing a continued rise in costs to practice. **We are concerned that adding a new payment structure with a daily cap will place an unsustainable financial burden on Anthem CT providers, which could directly impact beneficiaries who need medically necessary speech-language pathology services.**

Finally, the announcement indicates that this new methodology intends to provide more predictability and ease of management. However, providers are expected to continue providing all the same claim information and documentation despite this significant change in payment structure. ASHA members would like to better understand the efficiencies Anthem CT anticipates providers and patients will gain through this new system as they consider the implications of this announcement for their practices. As such, **ASHA respectfully requests a meeting with Anthem CT to further discuss the changes and its impact on SLPs and the patients they serve.**

Thank you for your time and attention to this matter. We look forward to ongoing collaboration to ensure Anthem CT beneficiaries receive appropriate access to medically necessary care. If you or your staff have any questions, please contact Meghan Ryan, MSL, ASHA's director of health care policy for private health plans, at mryan@asha.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Tena L. McNamara". The signature is fluid and cursive, with the first name "Tena" being more prominent.

Tena L. McNamara, AuD, CCC-A/SLP
2024 ASHA President

¹ Anthem. (2024, July 1). *Important changes to payment structure for PT, OT, and ST*. Retrieved July 3, 2024 from <https://providernews.anthem.com/connecticut/articles/important-changes-to-payment-structure-for-pt-ot-and-st-20497>

² The Boards of Trustees, Federal Hospital Insurance and Federal Supplementary Medical Insurance Trust Funds. (2024, May 6). *2024 Annual Report of the Boards of Trustees of the Federal Hospital Insurance and Federal Supplementary Medical Insurance Trust Funds*. <https://www.cms.gov/oact/tr/2024>