

July 14, 2025

Dr. Mehmet Oz
Administrator
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
7500 Security Boulevard
Baltimore, MD 21244

RE: Updated Qualifications for Speech-Language Pathologists; CMS Manual System,
Change Request 13922

Dear Administrator Oz:

We, the undersigned state speech-language-hearing associations, are writing to request that the Centers for Medicare & Medicaid Services (CMS) revise its recent update to the Medicare Benefit Policy Manual (Section 230.3.B) to recognize speech-language pathologists (SLPs) holding state-issued provisional licenses as meeting the definition of a qualified provider under Medicare Part B.

Our state speech-language-hearing associations are the professional organizations dedicated to serving the interests of audiologists and SLPs within our specific state. We champion issues and needs unique to our individual states.

Although we endorse initiatives to uphold stringent professional standards, this recent change excludes provisionally licensed SLPs. These professionals have successfully completed accredited graduate programs, earned advanced degrees (master's or doctoral), passed the national Praxis examination, and possess valid state licenses. State provisional licenses grant legal authority for individuals to practice with a full scope, usually under structured supervision, and are fully recognized by state licensure agencies.

Excluding these licensed professionals from billing Medicare is already causing serious disruptions to care. The policy worsens critical provider shortages in rural and underserved communities, directly restricting access to care for Medicare beneficiaries. Many provisionally licensed SLPs have had job offers rescinded or lost current employment, despite being qualified and licensed.

We respectfully urge CMS to formally recognize provisional licensure as meeting the requirements of a qualified provider under Medicare Part B. This would uphold the intent of Section 1861(l)(a)(4)(A) of the Social Security Act, which states that SLPs are qualified providers as authorized under state law. Provisional licensure is the mechanism states have chosen to legally authorize those completing their supervised post-graduation professional experience to perform speech-language pathology services. This would ensure alignment with state licensure laws, protect access to medically necessary services provided by SLPs, and support the continued growth and stability of the speech-language pathology workforce.

We appreciate your attention to this critical issue and your continued dedication to ensuring accessible, high-quality health care for Medicare beneficiaries.

Sincerely,

Speech and Hearing Association of Alabama
Alaska Speech-Language-Hearing Association
Arkansas Speech-Language-Hearing Association
Arizona Speech-Language-Hearing Association
California Speech Language Hearing Association
Colorado Speech-Language-Hearing Association
Connecticut Speech-Language-Hearing Association
Florida Association of Speech-Language Pathologists & Audiologists
Hawaii Speech-Language-Hearing Association
Idaho Speech-Language-Hearing Association
Illinois Speech-Language Hearing Association
Indiana Speech-Language-Hearing Association
Iowa Speech-Language-Hearing Association
Kansas Speech-Language-Hearing Association
Louisiana Speech-Language-Hearing Association
Massachusetts Speech-Language-Hearing Association
Michigan Speech-Language-Hearing Association
Mississippi Speech Language Hearing Association
Missouri Speech-Language-Hearing Association
Montana Speech-Language-Hearing Association
Nebraska Speech-Language-Hearing Association
Nevada Speech-Language Hearing Association
New Hampshire Speech-Language-Hearing Association
New Jersey Speech-Language-Hearing Association
New Mexico Speech-Language-Hearing Association
North Carolina Speech, Hearing & Language Association
North Dakota Speech Language Hearing Association
Oklahoma Speech-Language-Hearing Association
Oregon Speech-Language-Hearing Association
Pennsylvania Speech-Language-Hearing Association
South Carolina Speech Language Hearing Association
Texas Speech-Language-Hearing Association
Vermont Speech-Language-Hearing Association
Speech-Language-Hearing Association of Virginia
Washington Speech-Language-Hearing Association
Wisconsin Speech-Language Pathology and Audiology Association
West Virginia Speech-Language-Hearing Association