



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

June 25, 2018

Seema Verma, MPH
Administrator, Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
Attention: CMS-1688-P
7500 Security Boulevard
Baltimore, MD 21244

RE: Medicare Program; Inpatient Rehabilitation Facility Prospective Payment System for
Federal Fiscal Year 2019

Dear Administrator Verma:

On behalf of the American Speech-Language-Hearing Association, I write to offer comments on the proposed rule modifying the inpatient rehabilitation facility prospective payment system (IRF PPS) for fiscal year (FY) 2019.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 198,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students.

Speech-language pathologists (SLPs) who provide services to Medicare beneficiaries in IRFs are impacted by the revisions to the IRF PPS. ASHA's goals are to ensure continued access to speech-language pathology services and to ensure that proposed revisions to the requirements improve the ability of facilities and providers to comply with Medicare regulations.

In the proposed rule, the Centers for Medicare & Medicaid Services (CMS) plans to allow physicians to participate in the weekly interdisciplinary team meetings remotely (e.g., by phone or video) and asks for comment on whether they should allow other members of the interdisciplinary team to participate remotely as well. **ASHA strongly supports allowing all members of the interdisciplinary team to participate remotely in the weekly meeting.** Our SLP members report that there are times when, based on the patient's medical condition, it has been difficult—if not impossible—to participate in the team meeting in person. For example, if an IRF patient has a swallowing or cognitive impairment that is severe or life threatening, SLPs must make a difficult choice of staying with the patient to ensure his or her safety – a choice that jeopardizes Medicare coverage for the stay because they miss the weekly meeting..

Thank you for the opportunity to provide comments on this proposed rule. ASHA remains committed to partnering with you to ensure revisions of the IRF PPS preserve access to IRF services, including speech-language pathology services, and minimize burden to the extent

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practicable. If you or your staff have any questions, please contact Sarah Warren, MA, ASHA's director of health care policy, Medicare, at swarren@asha.org.

Sincerely,

A handwritten signature in black ink that reads "Elise Davis-McFarland". The signature is written in a cursive, flowing style.

Elise Davis-McFarland, PhD, CCC-SLP
2018 ASHA President