

September 18, 2020

Seema Verma, MPH
Administrator
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
7500 Security Boulevard
Baltimore, MD 21244-8016

RE: Enhanced Telehealth Coverage of Clinically Appropriate Hearing, Speech, Language, Swallowing, and Cognition Services

Dear Administrator Verma:

The undersigned audiologists and speech-language pathologists (SLPs) who treat Medicare beneficiaries, write to express our disappointment that the Centers for Medicare & Medicaid Services (CMS) has not recognized additional audiology and speech-language pathology services that may be safely provided via telehealth during the ongoing public health emergency (PHE). We join our national association, the American Speech-Language-Hearing Association (ASHA), urging you to immediately expand the additional audiology and speech-language pathology services included in the authorized telehealth services list for the duration of the PHE.¹

Audiologists specialize in preventing, assessing, and treating hearing and balance disorders. SLPs identify, assess, and treat speech, language, swallowing, and cognitive impairments. Medicare beneficiaries must have continued access to our medically necessary diagnostic and therapeutic services to meet their functional goals. Providing these services via telehealth slows transmission of COVID-19 and ensures patients continue to receive the medically necessary treatment they need to meet their functional goals.

We appreciate that CMS has implemented flexibilities that meet the needs of some Medicare beneficiaries. However, the current list of approved telehealth procedure codes does not adequately ensure Medicare beneficiaries have access to the range of clinically appropriate audiology and speech-language pathology services they require. We urge CMS to expand the telehealth coverage list immediately.

Our national association notes that CMS has not expanded telehealth coverage to any additional procedure codes since April 2020. As the pandemic and PHE continue, CMS must continue to adapt policies to meet the ever-changing and growing needs of Medicare beneficiaries. We request that CMS add the following Current Procedural Terminology (CPT®) codes to the authorized telehealth services list for the duration of the PHE as soon as possible.

Recommended Audiology Telehealth Services

- **92550** (tympanometry and reflex threshold measurements)
- **92552** (pure tone audiometry, air only)
- **92553** (pure tone audiometry, air and bone)
- **92555** (speech audiometry threshold)
- **92556** (speech audiometry threshold; with speech recognition)
- **92557** (comprehensive audiometry)
- **92563** (tone decay test)

- **92565** (stenger test, pure tone)
- **92567** (tympanometry)
- **92568** (acoustic reflex testing; threshold)
- **92570** (acoustic immittance testing, including tympanometry, acoustic reflex threshold and decay testing)
- **92585** (auditory evoked potentials, comprehensive)
- **92586** (auditory evoked potentials, limited)
- **92587** (distortion product evoked otoacoustic emissions, limited, with interpretation and report)
- **92625** (assessment of tinnitus)
- **92626** (evaluation for pre-implant candidacy or post-implant status of auditory function; first hour)
- **92627** (evaluation for pre-implant candidacy or post-implant status of auditory function; each additional 30 minutes)

The audiology CPT codes we recommend adding to the telehealth list represent core diagnostic tests for identifying the type, severity, and etiology of hearing loss or the need for further vestibular testing. Audiologists can conduct testing for any of the listed services using remote access software to connect with a computer-based audiometer or auditory brainstem response (ABR) testing system at the originating site. In addition, an audiologist can use a video otoscope connected to the same computer to examine the ear before testing to ensure cerumen will not impede testing. A trained facilitator at the originating site acts as an extension of the audiologist and performs very specific tasks at the audiologist's direction, such as positioning the video-otoscope or placing headphones on the patient.

Although these services require the patient to leave the home to access audiologic testing equipment, telehealth provides a safe and effective means for the audiologist to conduct testing from a secondary location, such as a satellite office, without personal protective equipment (PPE) obscuring their face during the PHE. Visual cues, such as facial expressions and lip movement, are critical components of communication for patients with hearing loss. If the audiologist provides in-person testing with the necessary PPE, the quality and efficiency of testing may be significantly hampered by the need to write instructions or use a speech to text application to ensure the patient understands and complies with testing instructions.

Absent any means to receive core audiologic testing services via telehealth, Medicare beneficiaries with undiagnosed hearing or balance disorders face an even higher risk for isolation and depression. We urge CMS to allow Medicare beneficiaries access to practices that are already fully equipped and providing telehealth services to non-Medicare patient populations. Audiology telehealth services are well-established and diagnostic video-otoscopy, audiometry, otoacoustic emissions, and ABR conducted remotely yield equivalent results when compared to in-person testing.² Medicare beneficiaries deserve the same level of access to the telehealth services available to patients enrolled in Medicaid and private health plans.

Recommended Speech-Language Pathology Telehealth Services

- **92526** (treatment of swallowing dysfunction and/or oral function for feeding)
- **92607** (evaluation for speech generating device; first hour)
- **92608** (evaluation for speech generating device; each additional 30 minutes of evaluation time)
- **92609** (therapeutic services using speech generating device, includes programming and modification)

- **92610** (evaluation of oral and pharyngeal swallowing function)
- **92626** (evaluation for pre-implant candidacy or post-implant status of auditory function; first hour)
- **92627** (evaluation for pre-implant candidacy or post-implant status of auditory function; each additional 30 min)
- **96105** (assessment of aphasia, per hour)
- **96125** (standardized cognitive performance testing, with time in interpretation and report, per hour)
- **97129** (cognitive function intervention, initial 15 min)
- **97130** (cognitive function intervention, each additional 15 min)

The speech-language pathology CPT codes we recommend adding to the telehealth list represent evaluation and treatment of a range of communication and swallowing disorders that SLPs already provide via telehealth to our non-Medicare patients.

These services do not require additional specialized equipment and we provide them safely with the patient at home, when clinically appropriate. In-person speech-language pathology services often require close contact with the patient and expanded telehealth coverage will enhance safety and reduce the risk of transmitting COVID-19 to patients, clinicians, and their families. For example, swallowing evaluation and treatment requires examination of the patient's oral structure and function, and speech-generating device (SGD) services require the clinician to position the patient's assistive equipment and reach over and around the patient to program and modify the device. Providing these services via telehealth with the assistance of a caregiver to position the patient and the video camera allows the clinician an equivalent level of access to examine the patient and perform clinical functions required during evaluation and treatment.

Medicare beneficiaries may not be identified for risk of aspiration because they are afraid to obtain in-person services during the pandemic. Without access to a clinical evaluation for swallowing, they may not receive further instrumental assessment when necessary and—most importantly—they may not receive the treatment they need to avoid aspiration and other complications. Clinically appropriate evaluation and treatment for swallowing disorders is critical; otherwise, patients cannot fully recognize or mitigate their risk of choking, aspiration, and death due to swallowing disorders.

Patients with neurodegenerative diseases, such as amyotrophic lateral sclerosis (ALS), may quickly lose their ability to communicate if they do not receive a speech-language pathology evaluation to determine their suitability for a speech-generating device (SGD). Local coverage determinations require an SGD evaluation by an SLP before delivery of the SGD.³ Without consistent access to therapy, patients with cognitive, communication, and swallowing disorders may see a decline in their functional ability to complete activities of daily living or communicate their physical or emotional needs leaving them susceptible to further medical complications and a reduced quality of life.

We want Medicare officials to know that, as clinicians and ASHA members, we take our obligation to provide high quality care for patients seriously. ASHA's Code of Ethics requires that clinicians use their clinical judgment to determine the most appropriate services for their patients and deliver care via telehealth only if the services are equal in quality to those delivered in person.⁴ Delivering care that does not meet the standard of quality for in-person care represents an actionable violation of ASHA's Code of Ethics. This standing policy helps ensure patient protection when receiving telehealth services from ASHA certified audiologists and SLPs.

A recent ASHA survey of audiologists and SLPs regarding telehealth services during the PHE showed that 38% of audiologists and 43% of SLPs who responded do not provide services to individual patients via telehealth because they determined such services were not clinically appropriate to meet their patient's needs. This demonstrates that we maintain our commitment to upholding professional ethical standards and ensuring that only clinically appropriate patients receive audiology and speech-language pathology services at a quality equivalent to in-person care.

Thank you for taking the time to consider our perspective as clinicians who provide critical services to Medicare beneficiaries. We urge you to work with ASHA and other stakeholders—including consumer advocacy organizations representing the patients we serve—to expand Medicare's coverage of telehealth services during the PHE to all clinically appropriate services. Adding the recommended codes will enhance our ability to meet the needs of our patients, return our clinical practices closer to normalcy, and further reduce the risk of transmitting COVID-19 as we move into the dangerous cold and flu season.

Thank you again for the work you have done to improve Medicare coverage during the PHE. We look forward to your continued efforts on behalf of Medicare enrolled providers and the beneficiaries we serve.

Sincerely,

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