



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

November 1, 2018

Elizabeth Richter
Deputy Director
Center for Medicare
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

RE: Request for Workgroup to Examine Therapy Student Supervision Requirements

Dear Ms. Richter:

The American Occupational Therapy Association (AOTA), American Physical Therapy Association (APTA), and American Speech-Language-Hearing Association (ASHA) respectfully request a meeting with the Centers for Medicare & Medicaid Services (CMS) to discuss a proposed workgroup that would address the issue of student supervision requirements based on practice setting in the Medicare program.

As health care payment systems transition, there are current inconsistencies that make it challenging to educate and advise therapists and their students on Medicare supervision requirements, which potentially jeopardizes beneficiary access to care. AOTA, APTA, and ASHA request that CMS engage stakeholders—including professional societies and industry representatives—to address this issue. We believe that convening a workgroup would allow stakeholders the opportunity to collaborate with CMS on developing clear and concise guidance for student supervision requirements. It is critical for students to have access to the clinical training and experience they require, as well as maintaining patient quality standards and ensuring the integrity of the Medicare program. Providers require clear regulatory or policy guidance to ensure Medicare compliance.

Thank you for your consideration of this request. If you or your staff have any questions, please contact AOTA's Director of Regulatory Affairs, Sharmila Sandhu, at ssandhu@aota.org, APTA's Director of Regulatory Affairs, Kara Gainer, at karagainer@apta.org, or ASHA's Director of Health Care Policy, Medicare, Sarah Warren, at swarren@asha.org. Thank you for your consideration.

Sincerely,

American Occupational Therapy Association

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American Physical Therapy Association

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