



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

Submitted via email to: medical.policy@fcsso.com

August 27, 2018

Medical Policy Department
LCD Reconsideration
P.O. Box 2078
Jacksonville, FL 32231-0048

To Whom It May Concern:

On behalf of the American-Speech-Language-Hearing Association, I write to request a reconsideration of local coverage determination (LCD) 33413, Therapy and Rehabilitation Services.

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.

LCD 33413 dictates coverage for outpatient therapy services provided by speech-language pathologists (SLPs) under Medicare in FirstCoast's jurisdiction. Unfortunately, the LCD omits two Current Procedural Terminology (CPT) codes used by SLPs to report videostroboscopy (CPT 31579) and laryngeal function studies (CPT 92520). Both services are key diagnostic services for the identification and evaluation of voice disorders. ASHA is seeking clarification on the coverage requirements associated with the codes.

Upon review of LCD 33413, CPT codes 31579 and 92520 are not listed as reimbursable services. ASHA contacted the FirstCoast medical policy team for clarification on these services and were told:

“Currently, First Coast does not have any policy for CPT code 31579 (Laryngoscopy, flexible or rigid telescopic, with stroboscopy) and CPT code 92520 (Laryngeal function studies [ie, aerodynamic testing and acoustic testing]). Since there is no local coverage determination (LCD), the clinical notes/documentation should support that the service provided is medically reasonable and necessary for the particular patient on that particular circumstances.”

Unfortunately, **SLPs are billing for these critical diagnostic services and being denied reimbursement based on the claims alone, and prior to any review of clinical notes/documentation.** The lack of coding guidance in the LCD is resulting in automatic denials. Therefore, it is important for FirstCoast to clarify its coverage policies to ensure appropriate reimbursement for CPT codes 31579 and 92520. Although it may be FirstCoast's intention to reimburse for these CPT codes based on the individual needs of the patient(s), ASHA is

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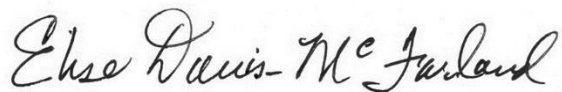
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concerned that there is a flaw in processing these claims resulting in denials before the individualized analysis can be conducted.

ASHA respectfully requests that FirstCoast clarify its coverage policies by including CPT codes 31579 and 92520 in LCD 33413. Including the codes in the LCD would prevent further denials for services provided by SLPs that are within their clinical scope of practice and are covered benefits for Medicare patients.

Thank you for the opportunity to provide comment on LCD 33413, Therapy and Rehabilitation Services. If you or your staff have any questions, please contact Sarah Warren, MA, director of health care policy for Medicare, at swarren@asha.org.

Sincerely,

A handwritten signature in cursive script that reads "Elise Davis-McFarland".

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