

**National Correct Coding Initiative**  
**Correct Coding Solutions, LLC**  
**A Medicare and Medicaid Contractor**  
**P.O. Box 907**  
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January 31, 2019

Mr. Jeffery P. Regan, MA  
Director, Government Affairs and Public Policy  
American Speech-Language-Hearing Association  
2200 Research Blvd.  
Rockville, MD 20850-3289  
(301) 296-5700

Dear Mr. Regan:

I thank you for your letter dated January 16, 2019 in which you comment about an addition to the *National Correct Coding Initiative Policy Manual for Medicare (Medicaid) Services* ("NCCI Manual"). We discussed your letter with CMS (Centers for Medicare & Medicaid Services) which owns NCCI and makes all decisions about its contents.

You comment about Chapter 11, Section H (Otorhinolaryngologic Services), Subsection 2 which states:

"2. Speech language pathologists may perform services coded as CPT codes 92507, 92508, or 92526. They do not perform services coded as CPT codes 97110, 97112, 97150, 97530 *or G0515*, which are generally performed by physical or occupational therapists. Speech language pathologists shall not report *HCPCS/CPT* codes 97110, 97112, 97150, 97530, 97127, *or G0515* as unbundled services included in the services coded as 92507, 92508, or 92526. *(CPT code 97532 was deleted on January 1, 2018.)*"

In particular your concern is about the addition of HCPCS code G0515 (Development of cognitive skills to improve attention, memory, problem solving (includes compensatory training), direct (one-on-one) patient contact, each 15 minutes) to the second sentence indicating that speech language pathologists do not perform that service. The addition of HCPCS code G0515 to that sentence was an inadvertent error. CMS acknowledges that speech language pathologists frequently perform the service described by HCPCS code G0515 and that there was no intention of changing CMS policy about whether speech language pathologists may bill that code.



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CMS publishes the NCCI Manual annually and will review this subsection for revision in the 2020 version of the NCCI Manual to be published in mid-November. Until the 2020 version of the NCCI Manual is published, please feel free to use this letter to explain to other parties who may misinterpret Subsection #2 as a change in CMS policy that there has been no change in CMS policy regarding this matter. Speech language pathologists may perform the services described by HCPCS code G0515 and may bill the code.

CMS and we appreciate your assistance with the NCCI and hope that this information will be helpful to you.

Sincerely,

**Signed electronically by Niles R. Rosen, M.D.**

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