



**DEPARTMENT OF HEALTH & HUMAN SERVICES**  
**Centers for Medicare and Medicaid Services**

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John E. Bernthal, Ph.D.  
President  
American Speech-Language Hearing Association  
10801 Rockville Pike  
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Dear Dr. Bernthal:

This letter is a followup to recent discussions held with representatives of the American Speech-Language Association (ASHA) regarding Medicare physician payment policy for services involving students. Specifically, ASHA representatives asked for assurance that speech-language pathology and audiology graduate students can participate in providing covered services to Medicare Part B beneficiaries.

More specifically, the following is a summary of our understanding of the typical scenario involving students for which speech-language pathologists and audiologists seek payment:

- Medicare Part B services are provided by practitioners who are acting within the scope of their state licensure requirements.
- Services are provided by an individual who is licensed in the state as a speech-language pathologist or audiologist or is certified by ASHA if there is no licensure in the state.
- The qualified practitioner (i.e., speech-language pathologist or audiologist) is recognized by the Medicare Part B beneficiary as the responsible professional within any session when services are delivered.
- The qualified practitioner is present and in the room for the entire session. The student participates in the delivery of services when the qualified practitioner is directing the service, making the skilled judgement, and is responsible for the assessment and treatment.
- The qualified practitioner is present in the room guiding the student in service delivery when the graduate student is participating in the provision of services, and the practitioner is not engaged in treating another patient or doing other tasks at the same time.

- The qualified practitioner is responsible for the services and as such, signs all documentation. (A student may, of course, also sign but it is not necessary since the Part B payment is for the clinician's services, not for the student's services).

In our discussions, ASHA representatives further provided the following two scenarios as examples to illustrate services that they believe would be payable under the Medicare physicians' fee schedule:

- A speech-language pathologist is seeing a Medicare Part B beneficiary who has aphasia. The speech language pathologist, with the graduate student's participation, develops a treatment plan for the session and both see the patient with the speech-language pathologist controlling the services rendered. The speech-language pathologist is in the room and engaged only in that patient's treatment at all times.
- An audiologist is assessing the hearing of a Medicare Part B beneficiary who was referred because of hearing loss and vertigo. The graduate student participates in conducting the pure tone and speech audiometry. The audiologist is in the room and engaged only in that patient's assessment at all times.

We agree that services provided under such arrangements are billable, assuming other rules such as medical necessity are met. Practitioners cannot bill for services provided by students alone. Nevertheless, the graduate student can participate in providing potentially billable services, such as for the scenarios outlined above.

Sincerely,



Terrence L. Kay  
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(Formerly the Health Care Financing Administration)