

Speech-Language Pathologists as Distant Site Providers

Prepared by

The National Association of Speech and Hearing Centers



Overview

The National Association of Speech and Hearing Centers is requesting that the Centers for Medicare and Medicaid, and federal and state legislators, recognize licensed and certified speech-language pathologists as “distant site providers,” allowing speech-language pathologists to continue to provide **access to equitable, efficient, and effective therapeutic services** beyond the federal and state public health emergency declarations caused by the COVID-19 pandemic. Passing the **Expanded Telehealth Access Act** achieves this goal.

Who Is NASHC

The National Association of Speech and Hearing Centers (NASHC) is a group of 45 non-profit speech and hearing centers from across the United States. **NASHC constitutes a vast network of more than 1,000 speech and hearing professionals who serve more than 150,000 individuals annually.** NASHC providers deliver more than 725,000 speech, language, and/or hearing services each year. NASHC exists for the purpose of promoting the highest quality standards as related to speech-language pathology and audiology services. NASHC has been advocating for individuals with communication disorders since 1986.



COVID-19 Response Of NASHC Members

The COVID-19 pandemic forced all of the NASHC speech and hearing centers to thoughtfully evaluate speech therapy service delivery models to ensure safety of staff and community.

During that evaluation process, 93% of reporting centers implemented or expanded telehealth services, with centers reporting an **increase in telehealth services of 500%-1400% in 2020 as compared to 2019.**

These tele-speech services are currently being paid for by public and private insurance programs. States and private payers have adapted telepractice policies or expanded coverage during the COVID-19 pandemic to include speech-language pathologists as providers who are eligible to provide services via telemedicine platforms. However, this eligibility to provide reimbursable telehealth services exists only under the public health emergencies that have been issued by the federal and state governments. When the public health emergencies are lifted, reimbursable access to speech-language pathology services will be extinguished unless Congress passes the ***Expanded Telehealth Access Act***.

2021 And Beyond

In order to provide safe, effective, and uninterrupted access to care to the communication impaired community, NASHC supports classifying speech-language pathologists as **distant site practitioners** via the ***Expanded Telehealth Access Act***.

This action will allow speech-language pathologists to continue to provide vital services even when public health emergencies are lifted across the country. **Telehealth services are proven to be economical, effective, and an attractive alternative** to face-to-face services for many members of the public. Speech-language pathologists can continue to offer telehealth services without disruption when classified as distant site practitioners.

Distant Site Practitioners

According to the Centers for Medicare and Medicaid Services at [cms.gov](https://www.cms.gov), distant site practitioners are those providers who can provide and get paid for covered telehealth services. Covered practitioners include:

- Physicians
- Nurse practitioners (NPs)
- Physician assistants (PAs)
- Nurse-midwives
- Clinical nurse specialists (CNSs)
- Certified registered nurse anesthetists
- Clinical psychologists (CPs)
- Clinical social workers (CSWs)
- Registered dietitians or nutrition professionals

This list represents professions that, similar to speech-language pathology, require specialized education, certification, and licensure. ***It is the position of NASHC that the Centers for Medicare and Medicaid Services permanently recognize speech-language pathologists as distant site practitioners***, a move seemingly supported by members of the United States Congress as indicated by a letter signed by eight members of Congress and sent to then Secretary of Health and Human Services, Alex Azar, in April 2020¹. It is imperative that Xavier Becerra, incoming Secretary of Health and Human Services under President Biden, respond to the request made by Congress in April 2020 and classify speech-language pathologists as distant site practitioners and urge colleagues to pass the ***Expanded Telehealth Access Act***.

Influence Of Medicare

It is widely accepted that private insurance companies follow the lead of Medicare, both with classifying covered versus non-covered services, such as telehealth for speech-language services, and determining reimbursement rates. When Medicare expanded access to telehealth through the 1135 waiver authority and Coronavirus Preparedness and Response Supplemental Appropriations Act, including speech therapy services, nearly all state Medicaid plans and private insurance plans followed suit. ***This dramatically increased access to care for not only Medicare beneficiaries but for adults of all ages and children across the US***; access that could become restricted if speech-language pathologists are not permanently classified as distant site providers by CMS.

Medicare had already made strides to expand access to virtual care through the use of E-visits and virtual check-ins and approved teletherapy for beneficiaries in rural areas. These actions were positive steps in expanding and broadening access to services; there are many beneficial aspects of continuing this expansion, with largely negative results of denying access to so many children and adults who have benefited from it.

¹ https://fletcher.house.gov/uploadedfiles/4.104.20_cms_telehealth_expansion_for_therapy_professionals.pdf.

Why Telehealth Matters For Speech-Language Pathology

Equity and increased access to care

With its potential to overcome barriers that limit access to care, **telehealth reduces health disparities for aging and underserved populations**². Telehealth gives patients living in rural areas access to more providers and allows them to receive care in their own homes and/or community-based locations, instead of traveling long distances. It also increases the number of providers that individuals in rural communities can choose from, allowing patients to obtain second opinions or find providers that are a good fit for their therapeutic needs. However, while these benefits are often celebrated in relation to patients in rural populations, they also apply to patients in urban and suburban locations, **providing patients across all socio-economic and demographic domains to participate in a more equitable healthcare system**.

Efficient and cost-effective

Telehealth has shown to be an efficient resource for the care of patients with communication disorders³. In addition to reducing barriers to care (e.g., travel cost and time, availability of reliable transportation, availability of qualified professionals), teletherapy has shown to be cost-effective and just as likely to help clients with language, motor, and fluency disorders to meet their therapeutic goals⁴⁵⁶. **Telehealth reduces patients' costs and burdens associated with lost work time, transportation and child care**⁷. Given the cost-effective nature of the services, speech-language pathologists and policy makers should adopt these services into healthcare delivery models⁸.

² <https://www.ncsl.org/research/health/increasing-access-to-health-care-through-telehealth.aspx>.

³ Dimer, N. A., Canto-Soares, N., dos Santos-Teixeira, L., & de Goulart, B. N. G. (2020). The Covid-19 pandemic and the implementation of telehealth in speech-language and hearing therapy for patients at home: an experience report.

⁴ Sharp, J. L. (2017). Comparison of traditional and telepractice-based treatment in the management of stroke-related aphasia (Doctoral dissertation).

⁵ Pennington, L., Stamp, E., Smith, J., Kelly, H., Parker, N., Stockwell, K., ... & Vale, L. (2019). Internet delivery of intensive speech and language therapy for children with cerebral palsy: a pilot randomised controlled trial. *BMJ open*, 9(1).

⁶ Eslami Jahromi, M., Ahmadian, L., & Bahaadinbeigy, K. (2020). The effect of tele-speech therapy on treatment of stuttering. *Disability and Rehabilitation: Assistive Technology*, 1-6.

⁷ <https://www.ncsl.org/research/health/increasing-access-to-health-care-through-telehealth.aspx>.

⁸ Tenforde, A. S., Borgstrom, H., Polich, G., Steere, H., Davis, I. S., Cotton, K., ... & Silver, J. K. (2020). Outpatient physical, occupational, and speech therapy synchronous telemedicine: a survey study of patient satisfaction with virtual visits during the COVID-19 pandemic. *American journal of physical medicine & rehabilitation*.

Fidelity and quality of care

Services by speech-language pathologists have often been considered in lock-step with services by physical or occupational therapists; however, there are key differences. Most notably, speech therapy uses speaking, listening and thinking; it rarely requires movement or adaptive equipment requiring physical presence. Teletherapy for speech therapy is more similar to that of a clinical psychologist or social worker with regards to actual process. Given that speech therapy is nearly always recurring over weeks or months, the patient also has an established relationship with their provider. Further, the American Speech-language and Hearing Association (ASHA, governing and licensing body for speech therapists) has issued strict guidelines for teletherapy including that use of telepractice must be equivalent to the quality of services provided in person. This is further defined in their Code of Ethics (ASHA, 2016a) and Scope of Practice (ASHA, 016b).



High levels of patient satisfaction

In addition, patients and caregivers report high levels of satisfaction with synchronous speech therapy delivered via a telemedicine platform. Reported benefits include decreased travel time, allowing more people to participate in care, and delivering care in the home or other natural environment. **Research shows that caregivers rate current telehealth visits provided by speech-language pathologists as “excellent” or “very good”** and report similarly positive feelings about future telehealth visits⁹¹⁰¹¹. A 2013 survey indicated that 74% of American consumers would use telehealth services, 70% are comfortable with virtual communications with their providers, and 80% have no reservations about submitting their personal medical information online¹². Telemedicine is an attractive option for caregivers.

⁹ Tenforde, A. S., Borgstrom, H., Polich, G., Steere, H., Davis, I. S., Cotton, K., ... & Silver, J. K. (2020). Outpatient physical, occupational, and speech therapy synchronous telemedicine: a survey study of patient satisfaction with virtual visits during the COVID-19 pandemic. *American journal of physical medicine & rehabilitation*.

¹⁰ Pennington, L., Stamp, E., Smith, J., Kelly, H., Parker, N., Stockwell, K., ... & Vale, L. (2019). Internet delivery of intensive speech and language therapy for children with cerebral palsy: a pilot randomised controlled trial. *BMJ open*, 9(1).

¹¹ Eslami Jahromi, M., Ahmadian, L., & Bahaadinbeigy, K. (2020). The effect of tele-speech therapy on treatment of stuttering. *Disability and Rehabilitation: Assistive Technology*, 1-6.

¹² Olson, C. A., & Thomas, J. F. (2017). Telehealth: no longer an idea for the future. *Advances in Pediatrics*, 64(1), 347-370.

Speech-Language Pathologists as Distant Site Providers

Telemedicine is an evidenced-based system that allows speech-language pathologists to deliver **equitable, efficient, and effective** therapeutic services to clients across socio-economic and geographic boundaries.

Access to this level of care should be recognized as a vital component of patients' menu of services and not something that is only accessible during public health emergencies.

Speech-language pathologists need to be recognized as distant site providers, a classification that has already been bestowed upon similarly-educated professional peers such as social workers and psychologists for the benefit of patients and communities. The ***Expanded Telehealth Access Act*** provides continuity of care to an already marginalized population, and passing of the act is supported by NASHC.

