

Medicare, Payment, and Clinical Education

Frequently Asked Questions by
University Clinics

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Speaker Disclosures

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Employed by University of Arizona	Employed by University of South Carolina	Employed by Illinois State University
Receiving travel support from CAPCSD	Receiving a stipend from CAPCSD	Receiving a stipend from CAPCSD
Non-financial	Non-financial	Non-financial
Member of the CAPCSD BOD and ASHA Health Care Economics Committee	None to report	None to report

Legal Disclaimer

Although the information provided in this presentation may be helpful background knowledge regarding Medicare, it does not constitute legal advice. This information may be based in part on current federal law and is subject to change based on changes in federal law or subsequent interpretative guidance. Where this information is based on federal law, it must be modified to reflect state law where that state law is more stringent than the federal law or other state law exceptions apply. This information is intended to be a general information resource and should not be relied upon as a substitute for competent legal advice specific to your circumstances. **YOU SHOULD EVALUATE ALL INFORMATION, OPINIONS AND RECOMMENDATIONS PROVIDED BY THIS PRESENTATION IN CONSULTATION WITH YOUR LEGAL OR OTHER ADVISOR, AS APPROPRIATE.**

FAQ's Background

Questions are the result of three (3) previous webinars

- Webinars and handouts from previous webinars are posted to CAPCSD website: <http://www.capcsd.org/univ-clinics/>
- Assessing the Financial Impact of Implementing Medicare Billing: Free Clinic or Fee for Service
- Medicare Implementation in a University Clinic: Training and Teamwork
- Skilled and Unskilled SLP Services: Differentiation and Documentation

Central Themes

- Opting-out
- ABN
- Billing
- Unskilled treatment/student hours
- Ethics regarding other populations
- Supervision
- Establishing Medical Necessity
- University breaks
- Documentation
- Preparing students
- Donations
- Voice Banking
- Physician Orders
- Other Questions

Opting Out

Question #1: "What about registering with Medicare as a "NON-participating provider? This would require the client/patient to pay for services, then submit paperwork for Medicare to provide them with reimbursement."

Question #2: "What is ASHA doing to lobby for allowing university clinics to provide treatment w/o being Medicare providers?"

The ABN (Advanced Beneficiary Notice [of Non- Coverage])

Question #1: "Are we allowed to bill privately for student led therapy with site-line supervision if the client signs an ABN?"
"What triggers the use of an ABN?"

Question #2: "Can clients opt out of billing Medicare with an ABN?" "What services can we provide for supervised student conducted therapy with a signed ABN?"

Question #3: "What triggers use of an ABN? SLPs clinical judgement? History of previous denial? History of denial for a particular program?"

Billing

Question #1: “Can you bill Medicare only, and not other insurances, including Medicaid?”

Question #2 “Is it possible to bill multiple visits [#2-9] on the same bill or does every visit require a separate bill?”

Question #3 : We have been advised to submit through a clearinghouse. What is this, and why is it good?

Billing

Question #4: Do undergrad only programs have to adhere to the billing policy since they are not accredited?

Question #5: "So for those fee-for-service but NOT billing MC, is there a time-frame in which they need to remediate this issue...or are they currently subject to fines?"

Question #6: "How does selling hearing aids fit into this? Are they covered? Can you be free for all services, including hearing evaluation, but charge for hearing aids? Are other free clinics collecting dispensing fees for hearing aids?"

Billing

Question: "What are some audiological services covered by Medicare?"

Unskilled Treatment and Student Hours

Question # 1: "Can students count unskilled services toward their required 400 clinical hours?"

Question #2: "If you know a client has Medicare and you know that what you're doing is unskilled, do you have to still bill Medicare? Do you then give free services or charge them a clinic fee?"

Question #3: "Who determined that communication focused conversation groups are unskilled? Particularly given LPAA model of considering QOL across a client's lifetime with aphasia and addressing goals as relevant to their current context. How can we advocate for a social model approach to providing meaningful services?"

Ethical Issues

Question #1: "A disadvantage of billing insurance is that we lose clients who are adults who stutter, transgender population, adults with developmental disabilities - lots of insurance companies do not cover these populations. It's onerous for these populations and does not allow our students to get experience in that population - how do you manage that?"

Question #2: "...I feel like it is unethical for a patient not to have access to a service via telepractice just because of their insurance...even if they wanted to pay out of pocket!? Can you speak to this at all?"

Supervision Requirements

Question #1: "How do the graduate students become independent thinkers when supervised 100% of the time?"

Question #2: "If the student leads the session for generalization and the supervisor is partially involved or observing would this be a non-billable visit?"

Question #3: "Our University leadership is interpreting the Medicare regulations (100% supervision) as following the patient and being required even if a free clinic. How have other clinics interpreted this?"

Establishing Medical Necessity

Question: “What documentation is required from referring physicians in terms of medical necessity?”

University Breaks

Question #1: “How do you handle breaks in service in the middle of a 90 day period (or even a 10 visit series) (i.e., semester breaks)?”

Question #2: “What parameters on frequency of services per week are desired by Medicare? If our students have a two week break, issue?”

Documentation

Question #1: "Can a student write an encounter note, plan of care, etc. submitted to Medicare, after it is edited by the clinical supervisor? Or should it be written and submitted by the clinical supervisor for billing?"

Question #2: "What are some resources that clinical educators can use to help students develop documentation skills to communicate medical necessity?"

Question #3: "Can we write one POC and leave it open from January to December with continually updating it every 30 days or 10th visit progress notes?"

Preparing Students

Question: “.....Would you know whether ASHA will be making room in the curriculum to ensure that our students can learn this and be better prepared in externships/employment to limit exposure or engagement in fraud.”

DONATIONS

Question #1: "Can a non free clinic have an option for donations?"

Question #2: "Why would donations to the university foundation for the clinic be illegal for Medicare beneficiaries?"

Question #3: "Do you have knowledge with donation clinics? At CAPCSD in Austin, some clinic directors mentioned that they moved to a donation based clinic. Can you provide me with insight on how this works?"

Voice Banking

Question: "We are considering offering voice banking services for the community through a company. We do not bill Medicare. Would we need to bill Medicare for this service if they are coming to our clinic or would the client bill through the company? We would be offering the facility for voice banking."

Physician Orders

“Do both audiology and speech services
require a physician’ referral?”



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Resources for Medicare, Payment, and Clinical Education: Frequently Asked Questions by University Clinics

- Opting-out
 - <https://www.asha.org/uploadedFiles/Medicare-Enrollment-for-University-Clinics.pdf>
- ABN
 - <https://www.asha.org/uploadedFiles/Medicare-Enrollment-for-University-Clinics.pdf>
 - <https://www.asha.org/Practice/reimbursement/medicare/audiology-medicare-ABN-FAQs/>
- Billing
 - <https://www.asha.org/practice/reimbursement/>
 - <https://www.asha.org/practice/reimbursement/coding/>
 - <https://www.asha.org/practice/reimbursement/medicare/>
 - <https://www.asha.org/practice/reimbursement/medicaid/>
 - <https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/bp102c15.pdf>
- Unskilled treatment/student hours
 - <https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/bp102c15.pdf>
 - <https://www.asha.org/uploadedFiles/Documentation-Skilled-Versus-Unskilled-Care-for-Medicare-Beneficiaries.pdf>
 - <https://www.asha.org/Practice/reimbursement/medicare/Examples-of-Documentation-of-Skilled-and-Unskilled-Care-for-Medicare-Beneficiaries/>
- Ethics regarding other populations
 - <https://www.asha.org/code-of-ethics/>
 - <https://www.asha.org/policy/SP2018-00353/>
 - <https://www.asha.org/policy/sp2016-00343/>
 - <https://www.asha.org/Certification/2020-SLP-Certification-Standards/>
 - <https://www.asha.org/certification/2020-audiology-certification-standards/>

- Supervision
 - <https://www.asha.org/uploadedFiles/Medicare-Enrollment-for-University-Clinics.pdf>
 - http://www.asha.org/practice/reimbursement/medicare/student_participation_slp/
- Establishing Medical Necessity
 - <https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/bp102c15.pdf>
 - <https://www.asha.org/policy/GL2004-00046.htm#F1>
 - <https://www.asha.org/Practice/reimbursement/medicare/Documentation-of-Skilled-Versus-Unskilled-Care-for-Medicare-Beneficiaries/>
 - <https://www.asha.org/Practice/reimbursement/medicare/Examples-of-Documentation-of-Skilled-and-Unskilled-Care-for-Medicare-Beneficiaries/#skilled-unskilled>
- Documentation
 - <https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/bp102c15.pdf>
 - <https://www.asha.org/Practice/reimbursement/medicare/audiology-medicare-documentation-FAQs/>
 - https://www.asha.org/Practice/reimbursement/medicare/medicare_documentation/
- Preparing students
 - <https://www.asha.org/Certification/2020-SLP-Certification-Standards/>
 - <https://www.asha.org/certification/2020-audiology-certification-standards/>
- Donations
 - <https://www.asha.org/practice/reimbursement/>
- Physician Orders
 - <https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/bp102c15.pdf>