

## **Policies and Procedures for Medicaid Supervision**

The Medicaid supervisor of speech-language therapists (SLTs) must be a speech-language pathologist (SLP) as defined by the American Speech-Language-Hearing Association (ASHA) Technical Report: *Medicaid Guidance for Speech-Language Pathology Services: Addressing the “Under the Direction of” Rule*. The supervising SLP is legally and ethically responsible for all services provided or omitted by the treating speech-language therapist. The supervising SLP must provide contact information for an alternate SLP who could supervise the SLTs, if needed. Supervising SLPs and SLTs being supervised will need to allocate sufficient time to ensure adequate communication and compliance.

When a Medicaid-eligible student is referred for a speech-language evaluation and/or treatment, an LLR-licensed SLP may serve as the LPHA in signing the “Referral for Speech-Language Evaluation and/or Treatment”. The referring SLP must next ensure that the appropriate evaluation process has been implemented. If the evaluation team determines that the student is eligible for services, the team develops an individualized educational program (IEP). If the supervising SLP is not in attendance at the IEP meeting, she/he must review and document her/his concurrence with services specified in the IEP on the “Referral for Speech-Language Evaluation and/or Treatment” before the IEP meeting. To receive Medicaid reimbursement for the services, the services must be determined to be “medically necessary” as defined by the South Carolina Department of Health and Human Services’ *Medicaid Provider Manual: Local Education Agencies*. Medical necessity is demonstrated by the evaluation report, the goals of the IEP, clinical service notes, and periodic review.

The supervising SLP must conduct a minimum of one observation and consultation of each Medicaid-eligible student per school year. However, the actual amount of supervision provided (to include the number of observations conducted) must be determined by factors such as the complexity of caseload and degree of experience and expertise of the SLT being supervised. The supervising SLP must review and initial each clinical service note entry. A form documenting supervisory activities must be completed and signed for each school year to maintain clear documentation of supervisory contacts. If during the annual review the IEP team determines that speech-language services should continue, the supervising SLP must ensure that a referral form is in place. For additional information, refer to the Medicaid provider manual for local education agencies at <https://www.scdhhs.gov/provider-type/local-education-agencies-040105-edition-posted-030405>.

## **Guidelines for the Supervising Speech-Language Pathologist (SLP)**

1. Supervising SLPs can access Medicaid- related information on the SCDE Office of Medicaid Services website at <http://ed.sc.gov/agency/os/Medicaid/> and must periodically review the Local Education Agencies (LEA) Medicaid manual at <https://www.scdhhs.gov/provider-type/local-education-agencies-040105-edition-posted-030405> to maintain an awareness of current Medicaid policies and procedures.
2. The supervising SLP is ultimately responsible for services that are provided and/or omitted. The supervising SLP should provide information regarding their responsibilities, as well as contact information, to relevant school staff and administrators.
3. The supervising SLP must be individually involved with the students being served and provide specific instructions regarding their treatment regimen.
4. The supervising SLP must be readily available to provide continuing supervision within a reasonable time.
5. The supervising SLP must conduct at least 1 observation of therapy sessions per school year of each student on the speech-language therapist's (SLT's) caseload (note: this is the minimum requirement).
6. The supervising SLP must provide contact information for an alternate supervisor when the supervising SLP is not available. "At no time may the individual being supervised perform tasks when the supervisor cannot be reached by personal contact, phone, pager, or other immediate means." Local Education Agencies Medicaid manual, page 2-3)
7. The supervising SLP must be directly involved in the development of each supervised SLT's IEPs. If the supervising SLP is not in attendance at the IEP meeting, she/he must review and document, before the IEP meeting, her/his concurrence with services specified in the IEP.
8. The supervising SLP can serve as the referring LPHA for SLTs if licensed by Labor, Licensing and Regulation (LLR) as a Speech Language Pathologist.
9. The supervising SLP must maintain documentation of Medicaid supervision.
10. The caseload of the supervising SLP will be determined by the number of SLTs supervised, as well as the number of Medicaid-eligible students. The amount of supervision will be determined by the complexity of caseload and degree of experience and expertise of the SLT being supervised.