

Eli's Rehab Report

Speech Spotlight : Going Independent in July? Don't Miss These Business Details

Nail down where you can provide your SLP services.

The last issue of Physical Medicine & Rehab Coding Alert spelled out a plethora of homework to do before July 1 if you're an SLP who wants to bill Medicare directly.

Here are a couple more details provided by **Kate Romanow**, director of health care advocacy for the American Speech-Language Hearing Association, on ASHA's Web site.

Question: What kind of practice or group can I form or join to bill Medicare directly?

Answer: An SLP may provide services as 1) an unincorporated solo practice, partnership, or group practice, or a professional corporation or other incorporated speech-language pathology practice; 2) an employee of a physician group; or 3) an employee of a group that is not a professional corporation. These are per Title 42 of the Code of Federal Regulations S410.62, Romanow said.

Question: Where can I offer my services?

Answer: An SLP may offer it in her private office space, provided that the space is owned, rented, or leased by and used exclusively for the practice, Romanow said.

You can also offer your services in the patient's home (and that does not include any hospital, critical access hospital, or skilled nursing facility). Also, a private office space is not required if the SLP sees patients only in their homes, Romanow clarified.

Question: What practice regulations should I follow for a private practice type of setting?

Answer: The new regulations mirror those governing physical therapists' participation in Medicare Part B but do not allow the use of assistants, Romanow said.

Note: The Centers for Medicare & Medicaid Services just released transmittals 106 and 1717 with specific guidelines for SLPs in private practice. The good news: These guidelines are the same as what PTs and OTs in private practice adhere to, confirms **Mark Kander**, director of health care regulatory analysis for ASHA. To view the transmittals, see www.cms.hhs.gov/transmittals/downloads/R106BP.pdf and www.cms.hhs.gov/transmittals/downloads/R1717CP.pdf.