

## Argument for an Increase in Speech Rates for Early Intervention Providers

### Details:

1. 92507 and 92526 codes ONLY with the modifiers of GN AND TL
2. Early intervention (children with developmental delays and disabilities birth up to the age of 3) is required to occur in the family's natural environment (per the Colorado State Plan, 12 CCR 2509-10, section 7.940(B)(4) and section 7.950(A)(7)).
3. The current code of 92507 is based on speech services occurring in a clinic setting, where a provider is able to provide 30-minute visits, which means 2 visits per hour for a rate of \$124.92 per hour.
4. Due to early intervention needing to occur in the home, an early intervention provider is typically only able to conduct 4 – 5 visits in a given day, virtually all early intervention visits are 1 hour, currently reimbursable at a rate of \$62.46 per hour/visit.
5. The current rate of \$62.46 does not take into account the fact that an early intervention provider needs to drive to the family's home, which impacts productivity.
6. Current reimbursement is well below 80% of the Medicare rate of \$80.37 per visit.
7. The home healthcare rate for speech is \$131 per visit and takes into account the fact that the provider has to drive to the family's home, providing virtually the same type of service as an early intervention provider.
8. Home Healthcare agencies have been increasing the number of speech therapists they are employing, thereby possibly impacting the number of referrals that can be picked up by independent early intervention speech therapists, and costing Medicaid significantly more for those visits.
9. Due to the additional requirements that a Home Healthcare is required to meet, the request is to have a rate that is 80% of the Home Healthcare rate for early intervention providers (\$104 per visit)
  - Due to the low rate, independent early intervention speech therapists have stopped seeing children with Medicaid, reducing the number of available providers statewide.
  - The attached spreadsheet shows the number of early intervention visits for speech therapy (92507) that were paid for the first three months of this fiscal year (data pulled from the Medicaid Colorado Interchange system). It has the total dollar amount paid (Column C), what would have been paid if the rate was \$104 per visit (Column D) and the additional amount that the State would be paying if the speech therapy services that were provided by independent providers were instead provided by a Home Healthcare agency (Column F).
  - As you can see, it is more cost effective to have independent speech therapists providing early intervention services to children in early intervention, even at a significantly higher rate (\$104), which will help with recruitment and retention of qualified early intervention speech therapists.

### Additional information

- Speech therapists with additional training and experience in providing feeding therapy can also bill the code 92526. Medicare reimburses this rate at \$87.94 per visit.

Medicaid only reimburses at a rate of \$25.46 per unit, with only 1 unit being allowed to be billed for a given session. Eighty percent of the Medicare rate for this code would be \$70.35.

- Occupational and Physical Therapists, who have a similar level of education and provide early intervention services can bill 4 units for an hour visit, which corresponds to reimbursement that can be as low as \$91.76 or as high as \$131.20
- There is an average of 3664 children per month in early intervention who have Medicaid.
- Independent early intervention providers have specialized training in early intervention best practices and follow those best practices. The focus of Early Intervention is to improve the capacity of the caregiver in enhancing the child's abilities in every day routines. This model reduces the need of long-term therapy services.
- Providers working through a Home Healthcare agency generally follow a medical model of providing services, which are not always in alignment with early intervention best practices.
- The average rate that providers are paid statewide for speech services through the local program (Community Centered Board – State General Fund) is \$86 per visit (this rate doesn't include travel that is paid by most CCBs)