

WSHA Presidential Summit on Licensure

July 21, 2003

Madison, WI

MORNING SESSION

Topic #1: Medicaid Billing

The Wisconsin Attorney General has been asked by the Centers for Medicare and Medicaid Services (CMS) to issue an equivalency ruling for DPI 820-licensed speech-language pathologists billing Medicaid in the schools. Under federal Medicaid guidelines, professionals billing must have ASHA certification or equivalent preparation/experience. WSHA has been solicited for input on a draft letter, written by the Department of Health and Family Services (DHFS). Should an equivalency ruling not be made, WI could be addressing at least a six-year “look back” recovery of billed services. In 2002 alone, the reimbursement total was over 10 million dollars.

Relevant Terminology/Facts

- Praxis I = Pre Professional Skills Test (PPST)
- Praxis II = NESPA (SLP National Test)
- PI34 is scheduled to go into effect 8/2004
 - Will include a mentorship program
 - Will require Praxis I and II
 - Will grandfather current license holders into new law at a specified level
- Current law is PI 3 and PI 4 (<http://www.dpi.state.wi.us/dpi/dlsis/tel/pi3sub7.html>)
- CMS Medicaid billing rules require that SLPs have ASHA CCC's or equivalent education and experience

Relevant Issues from the Summit Group

- BA/BS SLPs—Need to protect remaining few
- Local “requirements” of Medicaid billing strategies—different across schools, settings, and geographical areas
- Recent WSHA survey of school-based SLPs—50% return yields a reasonably representative view of school SLP certification and licensure status.
- DPI/DRL/ASHA grid from WSHA Board—question of accuracy/misperception
 - The scope of practice in PI3, PI4, PI34 is inferred
- Variability among school districts with regard to MA reimbursement procedures
- Professional preparation has been consistent for new graduates--academic program preparation has been ASHA-accredited since 1983, and accounts for coursework in all settings

There was general consensus from the Summit Group that the letter from DHFS in its current form needed to be edited. The concerns with the draft letter included the need to keep the focus narrow using simple, clear language to offer whatever data might be useful in support of equivalency ruling, and focus on current law (PI3 and PI4), not future law. With the list of relevant issues above, this topic was tabled until the lunch session.

Topic #2: Other Licensure Issues

There are other issues that are affecting both the nation and WI today that impact directly or indirectly a dialogue on licensure. The Summit Group was asked to brainstorm and delineate a list of non-Medicaid related issues regarding licensure.

1. WSHA members have continuing education needs.
 - a. Basic sessions
 - b. Training sessions for billing procedures
 - c. Setting specific/advanced sessions
 - d. Continuing education requirements and reporting are different for ASHA certification, DRL, and DPI, resulting in additional time/work for SLPs
2. Budgets are tight and all SLPs provide the same service to clients/students—simplify licenses.
3. University accreditation requirements and ASHA standards generate SLPs that have the same preparation regardless of the work setting they eventually choose. Both ASHA (2005) and DPI (2004) standards are shifting to outcomes that students must demonstrate how they have achieved. Specific course requirements are being replaced with outcome statements that can be met in a variety of ways.
4. Professional perception of who we are—Is a school SLP the same as a community SLP?
5. How does a consumer know who is a qualified SLP?
6. ASHA perception that CCC is the standard for practice.
7. Ease of professionals transferring state to state.
8. Extra work required to have DPI accreditation for undergraduate programs
9. Consideration of time and effort of school SLPs and WEAC in developing PI 34 as a commitment to improved education for WI students.
10. New professional's and student's perspective regarding the licensure process.
11. Is there a need for 2 licenses from a practice point of view?
12. Recognition of the importance of WEAC for school SLPs as their bargaining unit for salary, benefits and working conditions.
13. The need to consider the impact of any licensure changes on the IEP process
14. How do SLPAs fit into the SLP licensure picture?

These topics formed the list of discussion and consideration points for the lunch session.

LUNCH SESSION

The Summit Group was divided into small groups of 2-4 during the lunch session to discuss a list of 3 items:

1. Consider the November 2002 draft letter from DHFS. Given the necessary “bottom line” that acknowledges the equivalency of ASHA CCCs to DPI licensure, what further clarification or information would your team add to the letter to make it more clear and accurate for the WI Attorney General and CMS? Offer specific wording on the actual letter, based on the information received this morning.
2. Reflect on this morning's discussion regarding internal and external factors effecting licensure, both now and potentially in the future. What new information or perspective did each person of your team learn this morning from someone else? What information is still lacking in your mind or what issues still need to be uncovered?
3. Generate options for WSHA and the professions going forward regarding licensure. These options or “potential solutions” may be simple, multi-faceted, or somewhere in between. Think of the possibilities in light of all the factors and issues addressed this morning.

AFTERNOON SESSION

Topic #1: Medicaid Billing/Draft Letter

Each small group reflected on the draft letter and proposed a list of edits/changes to the letter while keeping the essential bottom line. A common theme was to “keep it simple” and answer the exact question from CMS. Consensus was reached that WSHA’s lobbyist and VP-Governmental affairs would consult with DHFS on this draft letter.

Topic #2: Reflection of the morning

1. Need external stakeholders (DPI, DRL, WEAC, school administrators, etc.)
2. Tangible perception of division among WSHA SLP members/settings
3. Investigation of collateral details
 - a. Collective bargaining/union issues
 - b. Administrative rules governing SLPs in schools
4. Is there a push from the membership to address this?
5. Are there differences in the perception of new and veteran professionals regarding licensure?
6. What is best for the WI SLPs?
7. Consumer protection is paramount– need consumer representation for considering licensure
8. DPI standards (2004) and ASHA standards (2005) are coming closer together—removal of specific course requirements to meet DPI standards and inclusion of reading/writing competency in ASHA standards.

Topic #3: Offer Future Options for WSHA/the Professions

1. Begin with students and streamline/assist their licensure process
 - a. portfolio, mentorship
 - b. single (license) application for both DRL and DPI licenses and ASHA certification
2. Fulfilling requirements of DRL would give DPI license holders greater portability for transferring to other states
3. Single base license with authorization stamps for specific work settings by DPI/DRL
4. Process of grandfathering in all DPI and DRL SLPs into new DPI license, encouraging more standards-based DRL license application and renewal, toward complete portability between 2 licenses and ASHA.
5. Educate WSHA members to utilize SLP educational preparation to provide the framework for meeting DPI (2004) and ASHA (2005) standards, including reciprocal CE arrangements
6. Continue with two licenses for WI SLPs with equivalent standards.
7. Include stakeholders in a Summit meeting
8. Member/Stakeholder education about relevant issues
9. Get input from WI graduate students and WI SLPs with 5 or less years of practice regarding the licensure process
10. Create WSHA statement for public comment
11. Possibly gather ASHA grant support for assisting school SLPs to obtain ASHA certification

SUMMARY/PROPOSED NEXT STEPS

This meeting was a Summit on Licensure; however, it was readily apparent that licensure, as a topic, has many underlying issues. One central issue is the unity of SLPs across all work settings. It appears that a majority of the Summit group agrees with the statement that speech-language pathologists are a single profession, independent of setting. That said, there are obviously differences and uniqueness to each setting that need to be taken into consideration. Saying we are one profession is not the same as saying we should have one license, nor does it define a methodology for achieving internal and external perceptions of a united profession. It is simply a common ground from which to begin. Unification of the SLP profession in Wisconsin is critical as we

have greater need to have a political voice on matters that affect any or all of our practice settings. Unity of SLPs in all work settings has the power of portraying WSHA as an association that speaks loudly for Wisconsin SLPs and allows us a greater influence on both our own organization and the world around us. Lack of clarity on the singleness of our profession is a stumbling block to further discussion—let us communicate clearly. Then we are able to ask the questions, “What does a united profession look like? Behave like? How does it organize itself for maximum benefit?”

Based on the conversation and notes from the Summit, here is a list of proposed next steps:

1. WSHA Board and staff members will contact DHFS with suggestions and feedback from this Summit.
2. WSHA will survey Wisconsin students in SLP programs (also at fall NSSLHA Leadership Retreat/WSHA Student Conferences).
3. WSHA will discuss these issues with school-based SLPs at the fall Schools Conference and with audiologists at the Fall Update.
4. WSHA Summit group will continue one-on-one dialogues within the Summit group by email/phone.
5. WSHA Summit group will discuss Summit-generated issues with colleagues in their local areas.
6. WSHA will host 5 Membership Committee-sponsored Roundtables on Professional Issues around the state in fall.
7. WSHA will consider reconvening the Summit group as needed.
8. WSHA will investigate and solicit stakeholder input, perhaps with another Summit-type meeting.