DATE:  April 17, 2012
TO:  Local Educational Agencies
SUBJECT:  Notification of California State Plan Amendment Number 05-010 Regarding the Supervision Requirements for Speech-Language Pathologists Under the Local Educational Agency Medi-Cal Billing Option Program

This Policy and Procedure Letter (PPL) notifies Local Educational Agencies (LEAs) participating in the Local Educational Agency (LEA) Medi-Cal Billing Option Program that approved California State Plan Amendment (SPA) 05-010 re-define some of the supervisory requirements for credentialed speech-language pathologists (SLPs) working in schools.

The California Attorney General, in opinion #06-1011, dated November 30, 2006, concluded that the State’s qualifications for the new Professional Clear Services Credential in Speech-Language Pathology is equivalent to the federal speech-pathologists qualifications in 42 CFR 440.110.

The Department of Health Care Services (DHCS) submitted SPA 05-010 to the Centers for Medicare and Medicaid Services (CMS) on September 26, 2008 after the California Commission on Teacher Credentialing (CTC) and the California Speech-Language Hearing Association, with assistance from DHCS, established equivalency for a credentialed SLP as a “speech pathologist” under the federal standard. The basis for SPA 05-010 was to remove supervision requirements for SLPs who have a Preliminary Services Credential in Speech-Language Pathology or a Professional Clear Services Credential in Speech-Language Pathology under the LEA Medi-Cal Billing Option Program. Due to unresolved claims processing issues, CMS returned SPA 05-010 to DHCS without review. DHCS resubmitted SPA 05-010 on September 20, 2011, which was approved on December 16, 2011.

Historically, SLPs holding a Clinical or Rehabilitative Services Credential in Language, Speech, and Hearing issued by CTC, and/or a clear Speech-Language Pathology license issued by the California Speech-Language Pathology and Audiology
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and Hearing Aid Dispensers Board have worked in California schools. Therapists holding a clear Speech-Language Pathology license did not require supervision for Medi-Cal billing purposes; however therapists holding only a CTC credential did require supervision for Medi-Cal billing purposes.

In 2011, CTC added a new credential for school speech personnel called the **Professional Clear Services Credential in Speech-Language Pathology**. This new credential allows those who hold the older CTC Clinical or Rehabilitative Services Credential to upgrade to the newer CTC Speech-Language Pathology Credential based upon:

- A current Speech-Language Pathology license,
- A current American Speech-Language Hearing Association (ASHA) Certificate of Clinical Competency (CCC), or
- A Speech-Language Pathology master’s degree and the Speech Language Pathology praxis exam.

See CTC’s website ([www.ctc.ca.gov](http://www.ctc.ca.gov)) for specific information regarding the requirements for this new credential.

According to SPA 05-010, speech therapists holding the older CTC Clinical or Rehabilitative Services Credential in Language, Speech, and Hearing may continue to provide services under the LEA Medi-Cal Billing Program, but must continue to be supervised by either an SLP with a clear Speech-Language Pathology license, or the new CTC Professional Clear Services Credential in Speech-Language Pathology.

The relevant LEA Provider Manual sections will be updated to reflect the new SPA policy. If you have any questions concerning this PPL please contact Mr. Rick Record, Admin Support/LEA Program Unit Chief, by phone at (916) 552-9065 or by email at Rick.Record@dhcs.ca.gov.

Sincerely,

**ORIGINAL SIGNED BY GERI BAUCOM**

Geri Baucom, Chief  
Administrative Claiming, Local and School Services Branch