

Illinois Speech-Language-Hearing Association

230 E. Ohio Street, Suite 400, Chicago, IL 60611-3265
Phone: 312/644-0828 Fax: 312/644-8557 Web: www.ishail.org
Voice and TT/TDD

August 4, 2010

Nina Ruparel
Professional Management Office
Blue Cross Blue Shield of Illinois
300 East Randolph
Chicago, IL 60601

Dear Ms. Ruparel:

On behalf of the Illinois Speech-Language-Hearing Association, thank you for the opportunity to respond to and clarify a matter of crucial importance.

In a letter dated June 2010, Blue Cross Blue Shield of Illinois (BCBSIL) expanded your Participating Provider Option (PPO) network to include Applied Behavioral Analysts and Developmental Therapists. As a professional organization which represents 2500 Audiologists and Speech Language Pathologists in the state of Illinois, it is imperative that BCBSIL have all of the facts concerning Developmental Therapists prior to inclusion as providers for your PPO network.

Developmental Therapy is a term used in Early Intervention in Illinois to describe an educational specialist. Developmental Therapists are a group of professionals who must have a bachelor's degree or higher in Early Childhood Education, Early Childhood Special Education, Special Education, Special Education: Deaf/Hard of Hearing or Blind/Partially Sighted, Child Development/Family Studies, Early Intervention, Elementary Education, Developmental Psychology or Social Work; or with a bachelor's degree or higher and a full specialist credential in the Early Intervention program; or a current license in art, music, recreation or other type of therapy, rehabilitative or habilitative in nature, in the state where they provide services to Illinois children. A Developmental Therapist (DT) is to help develop and support training and education in the Early Intervention system only. In Illinois, DT's are not an accepted profession outside of the Early Intervention System, do not possess a license (to protect consumers from fraudulent services), do not have an accepted scope of practice, do not have a Code of Ethics, and only exist in the Early Intervention system (for children ages 0 - 3 and not beyond age 3). Some DT's may be certified to do Applied Behavioral Analysis (ABA); the title DT does not guarantee training in ABA. DT's who bill for services are in violation of state laws because DT's are prohibited from billing services in the Illinois Early Intervention System per their provider agreement with the State.

Additionally, Audiologists and Speech Language Pathologists in Illinois are accepted professionals who graduate from an accredited educational program, who hold a license that stipulates an accepted scope of practice and Code of Ethics, have evidence based practice and professions, provide services to all ages of consumers in accordance with state licensure laws and can bill for services rendered using current procedure terminology (CPT) codes.

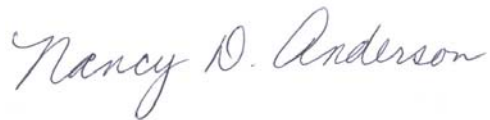


Professionals Serving People with Communication Disorders

There is a need to respond to state mandates for reimbursement of Autism services. It is of the utmost importance that these services be reimbursed only when rendered by providers who are individually licensed to provide those services. Usage of the codes which were sent in the packet poses a **real danger to consumers**, as it unleashes a group of *educators* to treat clients with *medical* etiologies. Access to these codes by DT's will drain family insurance benefits which should be only allocated to trained, licensed therapists. To further clarify, for example, speech language pathologists (SLP's) are the professionals licensed and qualified to use CPT codes 92506, 92527 and 92526.

Thank you for again for the opportunity to respond as a professional organization to this pivotal matter. ISHA welcomes continued discussion to ensure that BCBSIL members receive the highest level of services for medically necessary or mandated services.

Sincerely,

A handwritten signature in cursive script that reads "Nancy D. Anderson".

Nancy D. Anderson, MS, CCC-SLP/L
President, Illinois Speech-Language-Hearing Association
c/o Advocate BroMenn Medical Center
1302 Franklin Ave, Lower Level
Normal, IL 61761
nanderson@bromenn.org
(309)268-2498
(309) 268-5943 - fax

cc: Steven Hamman, Vice President, BCBSIL
Janet Gully, IL Dept. of Human Services, Bureau of Early Intervention
Rhonda Schleis, MS, OTR/L
Alison L. Liddle, PT, MPP, PCS
James M. Morphew, Lobbyist, ISHA, Sorling Law Office