



The South Carolina Speech-Language Hearing Association

SCSHA: Ensuring equitable access to speech, language, hearing, and swallowing services throughout South Carolina

For public release

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Key Points

- **Medicaid provider credentialing is governed by the state, and therefore any interpretation of the requirement of "a state license as a speech-language pathologist" would be determined by state licensure laws.**
- **The SC LLR Board of Speech-Language Pathology and Audiology is the body which determines, for the sake of public protection, who is a Speech-Language Pathologist.**

The SC Speech-Language Hearing Association (SCSHA) is aware of guidance from the American Speech-Language Hearing Association (ASHA), suggesting that SLPs with "provisional licensure" may no longer be recognized as qualified providers under the Medicare Part B benefit. This information was released by ASHA on June 9, 2025. Since that time, there have been no policy changes by Palmetto GBA, the Medicare Administrative Contractor for Jurisdiction M, which includes South Carolina. There was a regulatory change in 42 CFR 410.62(a) on January 16, 2025, effective April 18, 2025, released to providers May 29, 2025. This change required SLPs to meet the requirements at 42 CFR 484.4 as a condition for outpatient SLP service payment and coverage (MLN matters: MM13922).

The regulations in 42 CFR 484.4 reference 484.115, stating that "a state license as a speech-language pathologist" is a qualifying condition for SLPs to participate as Medicare providers (see 42 CFR 484.115(n)(1)).

SCSHA held a member chat on "The 2025 Clinical Fellow Crisis" on June 24, 2025 and shared information related to SLPs in South Carolina, Medicare, and Medicaid. Members were able to express their concerns to SCSHA leadership which led to the development of this member resource.

The following information has been collected for employers and supervisors who are attempting to evaluate the guidance on whether individuals with a "provisional license" are qualified providers for Medicare. It has also become clear that there are questions about whether or not the SLP Intern license in South Carolina is a provisional license or anything other than a full license. As the term "full license" is not defined in federal regulations or state statute relevant to Speech-Language Pathologists, these questions remain. Who are the licensed SLP interns? Are they qualified providers for Medicaid and Medicare? Which licensing and regulatory body is responsible for stating who qualified SLPs are in the state of South Carolina? Those questions will be addressed below.

Who are Licensed SLP Interns?

The licensed SLP Intern has the professional title of a “speech-language pathologist” in South Carolina. There is no limit in scope of practice, this is not a limited license, and the SLP Intern for all intents and purposes, is representing themselves as an SLP, in accordance with the practice act.

- These individuals have the scope of practice of Speech-Language Pathology per SC Code 40-67-20(14) and are not SLP Assistants.
- Licensed SLP Interns are practicing as Speech-Language Pathologists per SC Code 40-67-20(13).
- These individuals have met the defined licensure criteria as an SLP intern per SC Code 40-67-20(6), including meeting educational criteria and have graduated per SC Code 40-67-220(B)(1)(a).

The licensed SLP Intern uses the title “Speech-Language Pathologist.”

- The titles they may use are listed in SC Code 40-67-240(C). Those titles may include Speech-Language Pathologist, Audiologist, or Speech-Language Pathology Assistant.
- The license board requires the license to be clearly displayed in the person’s place of employment per SC Code 40-67-240(B).

Supervision requirements from the licensing board do not pose a limit on scope of practice.

- Licensed SLP Interns require “direct supervision” per SC Code 40-67-30 which is further clarified in regulation, SC Regulatory Chapter 115-3(C).
- “Direct supervision” in SC Regulations related to SLPs indicates required periodic on-site observations and monitoring activities in professional clinical employment (see SC Regulatory Chapter 115-3(C)). The SC licensing board version of supervision differs from the CMS definition of direct supervision; CMS “direct supervision” terminology is typically defined as the supervisor is on site and available to provide assistance.
- The licensed SLP intern is therefore an **independent** provider.
- Licensed SLP Interns are licensed for one year per SC Code 40-67-220(A). During that time they complete the supervised professional employment (SPE) requirements necessary for continued licensure by the Board of Speech-Language Pathology and Audiology.

The qualifications of the licensed SLP Intern were further clarified by SC LLR Board of Speech-Language Pathology and Audiology on the “Frequently asked questions” section of the board website: <https://llr.sc.gov/aud/faq.aspx>

Q: “Under the Board’s definitions in S.C. Code Ann. § 40-67-20, and the requirements for licensure detailed in S.C. Code Ann. § 40-67-220 and its associated regulations, what are the qualifications of an individual holding a South Carolina Speech-Language Pathologist Intern License?”

A: “An individual issued a South Carolina Speech-Language Pathologist Intern License has earned a post-graduate degree in speech-language pathology from a school or program approved by the Board who still needs to achieve a passing score on the appropriate professional exam approved by the Board and/or needs to complete the Supervised Professional Employment requirement for licensure consisting of a minimum of 30 hours per week of professional employment in speech-language pathology for at least nine

months--totaling not less than 1,260 hours--under the supervision of a speech-language pathologist licensed by the Board.”

“The use of the term “Intern” in the Speech-Language Pathologist Intern License designation is a term of art that is defined in pertinent part as “an individual who has met the requirements for licensure as a speech-language pathology or audiology intern.” The Intern designation in no way indicates that an individual holding this license has not fully completed a post-graduate academic program in speech-language pathology.”

Are Licensed SLP Interns qualified providers for Medicaid?

The SC Department of Health and Human Services clarified SLP provider qualifications with a policy revision in February 2024 which rested both on SC licensure and federal regulations from 42 CFR 440.110. The federal regulations in 42 CFR 440.110 are specific to Medicaid provider qualifications. The section on SLP qualifications for Medicaid in 42 CFR 440.110 includes language about the SLP who is acquiring the necessary work experience comparable to ASHA certification. SC LLR calls the necessary work experience the “supervised professional experience” (see SC Code 40-67-220(E)). Per an official state opinion by the SC Attorney General's office directed to SC DHHS Director Kerr in 2006, licensed SLP Interns qualify as Medicaid providers. See the resource list at the end of this document to find the direct link to the attorney general's opinion.

The provider manual for rehabilitative and therapeutic services shows the provider qualifications as follows:

From page 3: “Rehabilitative therapy/audiology services providers must meet all applicable Medicaid provider qualifications and state licensure regulations specified by the South Carolina Department of Labor, Licensing and Regulation (LLR). Medicaid reimbursement is available for rehabilitative therapy and audiological services when provided by or under the direction of the qualified rehabilitative therapy/audiology services provider to whom the beneficiary has been referred.”

Emphasis added - “under the direction of” - this includes SLP interns and SLP assistants as long as they are licensed by LLR. Manual link: <https://www.scdhhs.gov/providers/manuals/rehabilitative-therapy-and-audiological-services-manual>

One point of confusion in the ASHA information was that there is the potential for trickle-down policy changes since some payers take CMS guidance and adapt it to their policies. SC Medicaid has not changed policies, and 42 CFR 440.110 on Medicaid provider qualifications for SLPs has not changed; therefore, the policies currently in place apply for provider qualifications. Additionally, the state qualification to call oneself an SLP rests on having an SLP license or an SLP intern license. Licensed SLP Assistants must represent their license title differently, and services must be described as being provided by an SLP Assistant in those circumstances, per SC Regulations Chapter 115.

Are Licensed SLP Interns “a Speech-Language Pathologist” and qualify as providers for Medicare?

While ASHA has concerns about the terms “provisional,” “temporary,” or any other title that may be perceived as a limited license, the licensed SLP Intern in South Carolina has no limit or separate scope of practice from those carrying the license title of SLP. The SC LLR Board has considered licensed SLP interns to be practicing as **Speech-Language Pathologists** per SC Code 40-67-20(13) as they represent themselves as an SLP. The licensed SLP Intern has the scope of



practice of SC Code 40-67-20(14), speech-language pathology. This meets the federal minimum for 42 CFR 484.115 to be a Medicare provider, where a state license as an SLP is required.

SCSHA does not have concerns about the licensed SLP Intern being a qualified provider for Medicare. Licensed SLP Interns in South Carolina have had the privilege of providing high-quality services, with specific supervisory requirements according to licensing laws and regulations, since 2009. To date, there are no reports of difficulties in credentialing licensed SLP Interns to provide Medicare Part B services in our Medicare jurisdiction (M). There are also no reports of concerns regarding licensed SLP Interns providing services.

Why is it important to maintain provider qualifications for Licensed SLP Interns?

The ASHA Clinical Fellowship (CF) has been a requirement for certification in speech-language pathology since 1965, according to The ASHA Leader. Prior to that, there was a single level of certification for hearing and speech. The CF is a supervised, mentored period of professional experience that new graduates must complete before obtaining their Certificate of Clinical Competence (CCC).

In South Carolina, the level of licensure that is similar to the ASHA clinical fellowship is the Licensed SLP Intern. In order to ensure SLPs licensed in South Carolina (licensed SLP, licensed SLP Intern) can qualify as providers for federal programs such as Medicare, Medicaid, Veterans Affairs and other payers, it is important to ensure substantially similar (equivalent or greater) requirements as the ASHA clinical fellowship have been met by licensees, in accordance with federal regulations on provider qualifications. Additionally, public protection rests on ensuring personnel are qualified SLPs across settings.

RESOURCES

Professional and Policy Discussions

SCSHA Member Chat (June 24, 2025): The 2025 Clinical Fellow Crisis.

<https://scsha.memberclicks.net/assets/docs/Advocacy/The%202025%20CF%20Crisis.pdf>

South Carolina Attorney General Opinion on Medicaid Provider Qualifications for SLPs

<https://www.scag.gov/wp-content/uploads/2011/03/06apr19-Kerr.pdf>

National Perspectives and News Updates

ASHA Leader Article (May 2007): Looking Back and to the Future of Professional Education in Speech-Language Pathology.

<https://leader.pubs.asha.org/doi/10.1044/leader.AN.12072007.14>

MLN Matters Newsletter (May 29, 2025)

<https://www.cms.gov/training-education/medicare-learning-net/work/newsletter/2025-05-29-mln>

ASHA Advocate News Release (June 9, 2025)

<https://www.asha.org/news/2025/asha-advocate-06092025/?srsltid=AfmBOoqucajwy-meTIVffOcRZIfW5ocCicKrcxp4k7CbWh0tQx2Z7hq1>



Any information contained in this document should not be construed as legal advice and is not intended to be a substitute for legal counsel on any subject matter. All individuals who wish to verify legal requirements of license holders should consult the practice act and all relevant regulatory chapters for the practice of Speech-Language Pathology.

Medicare Policy and Provider Guidance

ASHA: Medicare Part B – Updated Definition of SLPs (May 29, 2025).

<https://www.asha.org/news/2025/medicare-updates-definition-of-speech-language-pathologist-in-its-benefit-policy-manual/>

ASHA Q&A: Medicare Part B Updates to SLP Provider Requirements (June 13, 2025).

<https://www.asha.org/practice/reimbursement/medicare/qa-2025-medicare-part-b-updates-to-slp-provider-requirements/>

Leadership and Advocacy Engagement

ASHA CEO Live Chat (June 17, 2025).

https://www.asha.org/events/ceo-events/ceo-live-chat-member-engagement-and-advocacy/?srsltid=AfmBOorSM-3vu_l0p59oADt7ri8aVimibklINB2kIip3tfs8IXqtNu4

Additional ASHA Resources from the CEO Live Chat

<https://www.asha.org/siteassets/events/chats/ceo-live-chat-asha-advocacy-resources-061725.pdf>