



# Benefits Collaborative FAQs: Speech Generating Devices

This FAQ document summarizes:

- Frequently asked questions regarding Department efforts to review the Alternative and Augmentative Communication Devices Benefit Coverage Standard (now retitled Speech Generating Devices) through the Benefits Collaborative 3-Year-Review Process; and
- Suggestions made within the Benefits Collaborative Process, and supported by more than one stakeholder, for how to improve the draft Speech Generating Devices Benefit Coverage Standard.

Below each item, the Department has provided an *interim* response.

**Important Note:** The 3-year-review of the Speech Generating Devices Benefit Coverage Standard is ongoing; there are several stages of the Benefits Collaborative Process that the draft has yet to complete. This FAQ document is a snap-shot of the Department position as of 11/13/2015 and should not be read as a final policy determination

## Item 1

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What *is* the speech generating devices policy proposed by the Department as of September 2015?

- On September 24, 2015, the Department presented a revised draft of the Speech Generating Devices Benefit Coverage Standard (formerly the Augmentative and Alternative Communication Devices Benefit Coverage Standard), as part of the Benefits Collaborative 3-year-review process. A copy of the draft Benefit Coverage Standard presented can be found at the link below.

[https://www.colorado.gov/pacific/sites/default/files/Benefits%20Collaborative%20Speech%20Generating%20Devices%20Benefit%20Coverage%20Standard%20%28Draft%209%20September%2024%2C%202015\\_1.pdf](https://www.colorado.gov/pacific/sites/default/files/Benefits%20Collaborative%20Speech%20Generating%20Devices%20Benefit%20Coverage%20Standard%20%28Draft%209%20September%2024%2C%202015_1.pdf)



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**Department of Health Care  
Policy & Financing**

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## Item 2

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How can I learn more about the Department's proposal?

- To learn more about what the Department proposed – and why, you may:
  - View slides 15-16 of the Power Point presentation dated September 24, 2015, located on the Benefits Collaborative Meeting Schedule webpage, found at the following link:  
<https://www.colorado.gov/pacific/sites/default/files/Benefits%20Collaborative%20Speech%20Generating%20Devices%20Presentation%20September%2024%2C%202015.pdf>
  - Contact Benefits Collaborative Coordinator, Kimberley Smith, at [Kimberley.Smith@state.co.us](mailto:Kimberley.Smith@state.co.us)

## Item 3

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In the proposed policy, the minimum replacement timeline for an SGD, accessory or Software is five years and, if accessories or software are approved for a Client Pre-owned SGD, a replacement SGD will not be covered for a minimum of three years. Does that mean that, if a client receives a piece of technology today, and a new piece of technology comes on the market one year from now that will clearly enable that individual to communicate more efficiently and effectively, Medicaid won't cover the device?

- Response forthcoming

It should be clear what type of documentation is needed to clearly demonstrate that a new technology will make a significant difference in the client's ability to communicate.

- The Department invited stakeholders to suggest language that captures this nuance for possible inclusion in the standard.



## Item 4

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Technology is proliferating at faster and faster speeds and we need to make sure that approved devices can keep up too, or be replaced when they do not.

For example, applications are updated regularly and there needs to be some flexibility built into the policy so that SGDs that are 4 years old, that do not support a necessary application, can be replaced.

- Response forthcoming

For example, recent discussions at the CLAG have revolved around new systems being designed to help people interact with their physician via technology, but those systems are not always accessible to people with disabilities.

- Response forthcoming

## Item 5

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Language in the draft should also speak to the fact that different clients need different levels of technology and also to a client's ability to participate independently.

- Response forthcoming.

## Item 6

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Can mention of a "new" device within the draft be amended to "new and/or refurbished with warranty"? Refurbished devices are often not used but may just have sat on the sales shelf longer and are updated with newer software.

- Response forthcoming

The Department should look at Medicare policy and the Medicaid policies of other states, which cover refurbished technology.

- Response forthcoming



## Item 7

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Access to care would be improved if a rendering provider (i.e. the manufacturer) were not required to obtain a prescription for simple things, such as a protective cases that lengthen the life of a device, from a speech language pathologist.

- Response forthcoming.

## Item 8

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The policy states that speech language pathologists should evaluate client need and recommend devices accordingly, however, the manufacturer is the one filling out the prior authorization form. The manufacturer may not know to include terminology such as "the client is nonverbal"; this has led to inappropriate denials in the past. How do we avoid this in the future?

- The Department invited stakeholders to suggest language or additional bullets that can be added to page 8 of the Benefit Coverage Standard under "required documentation" (which the rendering provider has to submit).

## Item 9

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On September 25, 2015, Renee Karantounis, Speech Language Pathologist, sent an email to the Department expressing that "I sincerely think the policy looks great and well aligns with other policies and again, appreciate your listening."

## Item 10

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On October 7, 2015, Jill Tullman, Christy Blakely and Barbara Myers provided the Department with comments/questions and suggested edits embedded within the policy proposed on September 24th. A link to these embedded comments can be found below.

<https://www.colorado.gov/pacific/sites/default/files/Benefits%20Collaborative%20Speech%20Generating%20Devices%20Post%20Meeting%20Feedback%20September%2024%2C%202015.pdf>



- Response forthcoming

## Item 11

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On October 7, 2015, Jill Tullman, Christy Blakely and Barbara Myers also provided the Department with a link to recent Massachusetts regulations that include coverage of iPads and encouraged the Department to consult this policy when drafting the revised Speech Generating Devices Benefit Coverage Standard. A link the Massachusetts policy can be found below.

[http://www.masslegalservices.org/system/files/library/AAC%20%20MassHealth%20Fact%20Sheet%209-16-15%20Final\(1\).pdf](http://www.masslegalservices.org/system/files/library/AAC%20%20MassHealth%20Fact%20Sheet%209-16-15%20Final(1).pdf)

- Response forthcoming