



April 17, 2020

Ms. Seema Verma, MPH
Administrator
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

RE: Waiver of Medicare Telehealth Restrictions during COVID-19

Dear Administrator Verma:

We first would like to take this opportunity to thank the U.S. Department of Health and Human Services (HHS) and Centers for Medicare & Medicaid Services (CMS) for their rapid response to the COVID-19 epidemic. **Given the critical importance of uninterrupted access to high-quality hearing health care and reducing the risk of transmitting COVID-19, we respectfully request that HHS and CMS use its authority under Section 3702 of the Coronavirus Aid, Relief, and Economic Security (CARES) Act to allow audiologists and speech-language pathologists (SLPs) to provide Medicare Part B services via telehealth during the current COVID-19 pandemic, and ensure that all telehealth platforms are accessible to people with hearing loss.** Beyond this immediate COVID-19 response and as we look to the future of Medicare, we respectfully reiterate and emphasize the importance of expanding coverage for the Medicare population to comprehensive hearing health services and treatment through all licensed hearing health care professionals, including otolaryngologists, audiologists, and hearing aid specialists.

Hearing loss is a serious health condition that impacts more than 38 million Americans, including one in three individuals between the ages of 65 and 74 and nearly half of Americans over the age of 75. It is estimated that untreated hearing impairments cost the U.S. economy \$56 billion in lost productivity, special education, and medical care per year.

Hearing health in the U.S. is a complex system, as diagnosis and treatment of hearing loss requires an array of services via multiple pathways. Services along the continuum of care include hearing evaluations, medical diagnoses of any underlying health conditions, treatment of hearing loss that may

include hearing aids, selection and fitting of hearing aids, maintenance, rehabilitation, and counseling following treatment. There are a variety of hearing health care professionals that provide a range of hearing care services for people of all ages with hearing loss, including: otolaryngologists, who are physicians specializing in the medical and surgical diagnosis, management, and treatment of disorders and conditions of the head and neck; audiologists, whose scope of practice includes performing tests to identify and assess hearing loss and balance disorders, recommending and fitting hearing aids, and assessing and treating processing disorders; speech-language pathologists, who prevent, assess, and treat speech, language, social communication, cognitive-communication, and swallowing disorders; and hearing aid specialists, who provide hearing evaluations, recommend, fit, and adjust hearing aids, and provide counseling and other hearing aid-related services.

In addition to navigating the maze of hearing health care services and providers, access remains an issue as Medicare and many third-party insurance plans do not offer coverage for the full range of hearing health services provided by licensed hearing health care professionals (including otolaryngologists, audiologists, and hearing aid specialists) or treatment options such as hearing aids.

Hearing health is essential, and this global pandemic has highlighted the critical importance of the ability to effectively hear and communicate. Given the disproportionate impact of COVID-19 on the older population, continued access to diagnostic hearing services as currently covered under Medicare Part B is vital. However, the COVID-19 pandemic has upended how many hearing health services are provided, leading to an increased reliance on technologies that reduce in-person interactions – including telehealth – to ensure continued care. Maintaining a patient’s access to their medical team is essential and research has shown that quality of outcomes can be similar between telehealth and office visits.

The CARES Act recognized the need to provide certain health services via telehealth to protect not only the vulnerable Medicare population from the spread of COVID-19, but their medical teams as well. Therefore, we ask that CMS exercise the authority provided under the CARES Act by expanding temporary waivers to cover these much-needed hearing health services as currently covered under Medicare Part B, via telehealth.

In addition, with the accelerated use of telehealth solutions comes an obligation to ensure that people with disabilities have equal access to these platforms. Accessibility is also a legal obligation under various laws, including the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, and other health laws as well as state and local laws. Access should be provided to people with hearing loss via captioning or sign language interpreters, but must be provided in whatever way ensures effective communication. We ask that CMS ensure that all health care providers ensure equal access to telehealth by people with hearing loss.

Prior to this global pandemic, Congress had taken initial steps to expand Medicare Part B coverage beyond diagnostic services to include access to hearing health care professionals and comprehensive hearing evaluations, and for the acquisition of hearing aids. Beyond COVID-19, we urge policymakers and the Medicare program to resume efforts to provide coverage for comprehensive hearing health, including hearing evaluations and hearing aids and devices. Under Medicare, we urge support for allowing and encouraging hearing health care professionals – including otolaryngologists, audiologists,

and hearing aid specialists – to provide services consistent with the scope of their licenses under state law. Notably, under Medicare Advantage, which enrolls approximately 34% of the Medicare population, almost all plans offer a supplemental benefit for hearing, dental, or vision, and all three benefits are offered under 50% of these plans.

We appreciate your commitment to high-quality, accessible health services for the Medicare population. As we all adapt during this pandemic and look toward the future, we urge you to continue efforts to promote good hearing health and improve the quality of life for individuals with hearing loss.

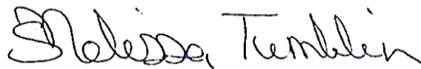
Respectfully,



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