

IHS Position Statement on Network Provider Inclusion

Hearing aid specialists must be among the providers included in any network that provides coverage for hearing aids and related service.

EXECUTIVE SUMMARY

The International Hearing Society (IHS) represents the interests of approximately 10,000 hearing aid specialists in the United States. Hearing aid specialists are healthcare professionals licensed by the states specifically to provide hearing health services. Hearing aid specialists represent one-third of hearing healthcare providers and dispense approximately one-half of the nation's hearing aids. It is IHS's position that licensed hearing aid specialists be among the providers included in any network that provides coverage for hearing aids and related services.

Hearing aids are effective devices that dramatically improve the quality of life and health of those who use them. According to AARP's *Consumer Guide to Hearing Aids*, "Almost everyone with a hearing loss hears better with a hearing aid." More than 31 million Americans suffer from hearing loss yet only 23% of those who could benefit from a hearing aid use one. Studies demonstrate a strong association between untreated hearing loss and depression, anxiety and functional decline. Untreated hearing loss can also result in a loss of income of up to \$12,000 per year depending on the degree of hearing loss. More must be done to expand the benefits of amplification to an increasing number of Americans.

IHS strongly believes that in order to preserve patient choice and ensure quality hearing healthcare for the greatest number of Americans, licensed hearing aid specialists must be among the providers included in any provider network that provides care to patients with coverage for hearing aids and related services. IHS urges that hearing aid specialists be included in provider networks serving patients with insurance coverage for hearing aids and related services.

SUPPORTING DOCUMENTATION

Hearing Aid Specialist Scope of Practice

- Hearing aid specialists are healthcare professionals licensed by the states specifically to provide hearing health services. These services include, but are not limited to: eliciting patient case histories; administering otoscopy; performing tympanometry; administering and interpreting tests of human hearing; determining candidacy for hearing instruments and assistive devices; referring as appropriate for cochlear implant evaluation or other clinical, rehabilitative, or medical interventions; prescribing, selecting, and fitting appropriate hearing instruments and assistive devices; assessing hearing instrument efficacy utilizing appropriate fitting verification methodology; taking ear impressions and preparing, designing, and modifying ear molds; providing counseling and aural rehabilitative services; providing ongoing service and repair; and providing supervision and in-service training of those entering the dispensing profession.
- Hearing aid specialists dispense approximately 50% of the nation's hearing aids.

Federal Government Recognizes Hearing Aid Specialists

- Food and Drug Administration: All three members of the hearing healthcare delivery team – hearing aid specialists, audiologists, and physicians – are recognized by the federal government as essential and fully qualified entry points into the hearing healthcare delivery system. The preamble to the current U.S. FDA regulations governing the conditions for sale of hearing aids states that "the [FDA] Commissioner regards the hearing aid dispenser as an important member of the hearing healthcare team, strategically positioned within the delivery system to provide the hearing aid user with essential services." Importantly, hearing aid specialists are often located in more rural areas, while audiologists and otorhinolaryngologists (ENTs) tend to be clustered in more urban settings.
- Bureau of Labor Statistics: The federal government recognizes the hearing aid specialist profession in the Standard Occupational Classification Manual for 2010 put forth by the U.S. Department of Labor Bureau of Labor Statistics. Hearing aid specialists are separately identified as a distinct detailed occupation under Healthcare Practitioners and Technical Occupations, with a unique identifier of 29-2092.
- National Provider Identifier: Hearing aid specialists are eligible for the federal government's Standard Unique Health Identifier for Healthcare Providers, known as the National Provider Identifier (NPI). This 10-digit number will eventually replace all other healthcare provider identification numbers, including the Uniform Provider Identification Number (UPIN) used by Medicare. Hearing aid specialists are specifically recognized under the taxonomy code 237700000X.

Importance of Access to Hearing Aids

- IHS is dedicated to improving hearing health, an integral part of overall health and general well-being. Studies have demonstrated that hearing aids are efficacious devices that improve the quality of life and health of those who use them. Regrettably, only approximately 23% of Americans who could benefit from amplification presently utilize a hearing aid. This means that of the more than 31 million Americans who suffer from hearing loss, only a small fraction actually enter the hearing healthcare delivery system and receive services. Accordingly, IHS is working to shape a future in which an increasing number of Americans, including Medicare and Medicaid beneficiaries, enjoy the proven benefits of amplification.

U.S. Office of Personnel Management Recognizes Importance of Including Hearing Aid Specialists in Provider Networks

- In its March 2008 annual call letter for benefit and rate proposals from Federal Employees Health Benefits Program (FEHBP) carriers, the U.S. Office of Personnel Management (OPM) strongly encouraged "proposals for enhanced hearing benefits for adults, including hearing aids." OPM provided specific guidance with respect to hearing healthcare providers in a subsequent April 11, 2008 letter which informed insurance carriers that "Licensed and qualified hearing healthcare providers (hearing aid specialists, audiologists and otolaryngologists) should be included in provider networks for hearing aids and related services." The FEHBP covers approximately eight million government workers and their families and is often cited as a model for healthcare reform efforts.

Government-Funded Programs Expand Access to Hearing Aids

- Department of Veterans Affairs: While the vast majority of hearing aids (approximately 70%) are still purchased with out-of-pocket funds, patients are increasingly receiving assistance with their hearing healthcare expenditures. In 2006, the U.S. Department of Veterans Affairs dispensed 316,382 hearing aids, or 13.4% of the entire U.S. hearing aid market of 2.37 million units.
- Medicare: Increasing coverage of hearing aids is also evident in the Medicare program. Since its inception in 1965, traditional Medicare, which provides public health insurance coverage to 44 million people, has specifically excluded coverage for hearing aids. While approximately 80% of Medicare beneficiaries have their health bills paid by the traditional program, 20% of Medicare beneficiaries now receive their Medicare benefits through private health plans that receive payments from Medicare. The number of Medicare beneficiaries enrolled in these private plans, called “Medicare Advantage” plans,” increased from 5.3 million in 2003 to 8.7 million in 2007. Some of these Medicare Advantage plans cover additional benefits such as hearing and vision care in addition to traditional Medicare benefits.
- Medicaid: Medicaid is the nation’s public health insurance program for 55 million low-income Americans. The federal and state governments jointly finance the program but Medicaid is administered with significant latitude by the states within the parameters of federal law and regulations. In many states, hearing aid specialists are included as Medicaid providers and successfully care for hearing impaired beneficiaries on a daily basis. Medicaid’s Early and Periodic Screening, Diagnostic, and Treatment Program (EPSDT) requires that children under the age of 21 receive any medically necessary healthcare services, including hearing screenings and hearing aids, even if the service is not provided under the state Medicaid program to the adult Medicaid population. States may choose to provide hearing aids and related services to Medicaid-eligible adults, but they are not required to do so under federal Medicaid law.
- State Mandates: Some states have passed legislation mandating insurance coverage of hearing aids. While these laws vary greatly, some require coverage of hearing aids for children while others, for example, require coverage of hearing aids for state employees.

Access to Hearing Healthcare Services and Hearing Aid Specialists Should be Maximized

- IHS strongly believes that access to hearing healthcare services should be maximized and not impeded. Access and timely service are the touchstones of hearing healthcare. Accordingly, IHS believes that licensed hearing aid specialists must be included in health insurance provider networks for plans that provide coverage for hearing aids and related services.
- In many cases, inclusion of hearing aid specialists as eligible providers of hearing care services to patients with insurance coverage for hearing aids and related services will ensure that longstanding provider/patient relationships will not be abruptly and unjustifiably terminated. Because successful hearing aid users typically maintain a continuing and ongoing relationship with their hearing healthcare providers, foreclosing patients’ access to the services of hearing aid specialists could result in enormous disruption to patients’ hearing health.
- IHS has joined with others in the hearing health sector to recommend a national hearing healthcare reimbursement policy that embraces four key principles: patients should be allowed to select their licensed hearing healthcare provider; patients should be allowed to

choose to upgrade the device, if clinically appropriate, at patients' expense; products and services should be of the highest quality; and all treatment should be medically-effective.

CONCLUSION

IHS strongly believes that in order to preserve patient choice and ensure quality hearing healthcare for the greatest number of Americans, licensed hearing aid specialists must be among the providers included in any provider network – whether formal or informal – that provides care to patients with coverage for hearing aids and related services.