

**SENT ELECTRONICALLY**

April 2, 2020

Seema Verma, Administrator,  
Centers for Medicare and Medicaid  
Department of Health and Human Services  
200 Independence Avenue  
Washington, DC 20201

Dear Administrator Verma:

The American Academy of Audiology (the Academy) thanks you for the tireless efforts of the Centers for Medicare & Medicaid Services (CMS) to share information with health care providers and reduce regulatory barriers to meet public needs during the COVID-19 pandemic. The Academy is the world's largest professional organization of, by and for audiologists. Representing the interests of approximately 14,000 audiologists nationwide, the Academy is dedicated to providing quality hearing and balance care services through professional development, education, research, and increased public awareness of hearing and balance disorders.

**The Academy Urges the Agency to Lift the Medicare Physician Order Requirement Currently in Place for Beneficiary Access to Audiologists and Allow Audiologists to Provide Services Via Telehealth.**

At the present time, many seniors are effectively cut off from the world as senior living facilities across the country have enforced a lockdown. This situation can lead to increased feelings of isolation and depression and untreated hearing loss is linked to these conditions as well. This is a frightening time for many seniors and communicating adequately is essential for them to interact with caregivers and to stay connected with family members. Individuals with even mild hearing loss are three times more likely to experience a fall and falls are the leading cause of fatal injury for Americans over age 65.<sup>1</sup> In addition, research is now emerging indicating that Seniors with untreated hearing loss are more likely to develop cognitive decline up to 40% faster than those without hearing loss.<sup>2</sup>

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<sup>1</sup> Centers for Disease Control and Prevention. (May 2018) *Deaths from Falls Among Persons Aged ≥65 Years — United States, 2007–2016*. <https://www.cdc.gov/mmwr/volumes/67/wr/mm6718a1.htm>;

<sup>2</sup> Lin, Frank and Yaffe, Kristine. *Journal of the American Medical Association: Hearing Loss and Cognitive Decline in Older Adults*. (February 2013) <https://jamanetwork.com/journals/jamainternalmedicine/fullarticle/1558452>

## **Recent CMS Action to Loosen Medicare Restrictions on the Provision of Services Via Telehealth Exposes Flawed Medicare Approach to Audiology Services**

On March 30, the Agency announced that it would allow services provided by licensed clinical social workers, clinical psychologists, physical therapists, and speech-language pathologists to be paid for as Medicare telehealth services. Services provided by audiologists were not included in this list. One can surmise that perhaps audiology services were not included in this list due to the outdated Medicare classification of audiologists as “suppliers” and the treatment of audiology services that currently exist.

Under the best of circumstances, Medicare beneficiaries face significant barriers in accessing the services of an audiologist. Seniors must first obtain a physician order even before being allowed to seek the services of an audiologist to have their hearing tested. In addition, audiologists may only provide diagnostic testing, even though they are able to provide both *diagnostic and treatment services* under the licensing laws of all fifty states. Finally, audiologists are not considered “practitioners” in Medicare—but are still considered “suppliers”—a classification that has outlived the evolution of the profession since the inception of the Medicare program. Most other similarly situated allied health professionals are deemed “practitioners” in Medicare—including those professionals included in the recent telehealth expansion.

## **Medicare is An Outlier in Access to and Coverage of Audiology Services**

The Department of Veteran Affairs, Medicare Advantage and most private insurance plans allow direct access to the services of audiologists. In varying degrees, these entities also reimburse audiologists for diagnostic and treatment services and allow them to provide services via telehealth. The VA has a robust audiology telehealth program in order to ensure veterans are able to maintain access to audiology services. As a model, the Department of Veteran Affairs has recognized that providing audiology services via telehealth is an effective way to reach rural veterans.<sup>3</sup> “Expanded use of innovative technology is increasing access points to hearing care in remote areas, enabling telehealth providers to expand their reach to patients and their families in satisfying and effective ways,” said Chad Gladden, audiology telehealth coordinator for the Audiology and Speech Pathology National Program Office.<sup>4</sup>

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<sup>3</sup> <https://www.blogs.va.gov/VAntage/62446/audiology-telehealth-helping-rural-veterans-access-hearing-evaluations/>

<sup>4</sup> <https://www.blogs.va.gov/VAntage/62446/audiology-telehealth-helping-rural-veterans-access-hearing-evaluations/>

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We appreciate the opportunity to provide these suggestions to the Agency. Audiologists stand ready to provide critical services to seniors at this time to ensure they remain connected to their surroundings and are able to understand their caregivers and medical professionals. If you have any questions about the information included in this letter, please contact Susan Pilch, Senior Director of Government Relations at [spilch@audiology.org](mailto:spilch@audiology.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Catherine Palmer". The signature is fluid and cursive, with a long horizontal stroke at the end.

Catherine V. Palmer, PhD  
President, American Academy of Audiology