Medicare CI Coverage Expansion: A Future Possibility via National Coverage Determination

Donna L. Sorkin MA / Executive Director / American Cochlear Implant Alliance  dsorkin@acialliance.org

One of the first initiatives undertaken by the newly organized American Cochlear Implant Alliance was a multi-center study to explore outcomes in older adults with greater speech recognition than is allowed under current Medicare criteria. We approached CMS requesting that they partner with us and allow Medicare expanded coverage for individuals who were part of the ACI Alliance study. Principal investigators Terry Zwolan PhD, Craig Buchman MD, and John Niparko MD led the study effort. Historical discussion of what was done is on the ACI Alliance website.

The study assessed outcomes in Medicare beneficiaries with scores that fell between 40 and 60% correct on AzBio sentences in best aided condition when stimuli were presented in quiet at 60 dBA. Study results were published in JAMA Otolaryngology in October 2020 in a paper “Assessment of Cochlear Implants for Adult Medicare Beneficiaries Aged 65 Years or Older Who Meet Expanded Indications of Open-Set Sentence Recognition: A Multicenter Nonrandomized Clinical Trial” by Zwolan et al.

Though the study results were favorable, we have a bit more to do. We have made a formal request to CMS for reconsideration of criteria under a National Coverage Determination (NCD). There is a long list of others in the NCD queue so we are uncertain when our request will be published—the necessary step before the process can proceed.

Comments from CI clinicians who have struggled to provide CI to older adults because of the currently restrictive Medicare criteria as well as those who have been able to gain coverage for 65+ adults are urged to submit. ACI Alliance is monitoring the CMS website and will notify our members immediately once the NCD is published with details on how and where to submit. It is important to reference the specific published findings in the study by Dr. Terry Zwolan and others. For example:

- How does your own clinical experience compare with the proposal to expand Medicare criteria?
- Has your clinic seen improved outcomes in older adults that aligns with the outcomes in younger patients?
- Have older adults with better speech recognition performed better with a CI than those who meet Medicare’s current, more restrictive criteria? Discuss the fact that waiting until a patient loses more hearing means that they may never achieve the outcomes of those who receive the technology sooner and the risk associated with waiting.

Please think about the above topics now vis a vis your patients’ experiences so that you will be able to prepare comments quickly to support the NCD. The NCD could open as early as January 2022, so we need to be ready. We will send out an alert once the NCD is published to aid CI clinicians who wish to support the NCD to know what to do. Of course, reach out to me if you have questions or suggestions.

ACI Alliance recognizes the volunteer efforts of those who supported the initiative by participating as study sites and especially the PIs for the study—Drs. Terry Zwolan and Craig Buchman. Participating study sites include: Hearts for Hearing, Johns Hopkins University, Loyola University, Medical College of WI, Medical University of SC, St. Luke’s Midwest Ear Institute, NYU, Ohio State University, Rocky Mountain Ear Center, University of IA, University of Miami, University of Michigan, University of NC, University of PA Health System, University of Southern CA, University of TX Southeastern Medical Center Dallas, University of WA, Vanderbilt University, Washington University St. Louis.

Of note, once the NCD is published, we will have only 30 days to provide comments and to cite pertinent literature supporting the request, so it is critical that we think now about what we will submit to support the request for expanded criteria.