



September 29, 2023

Mr. Brian Jensen
Ms. Korrina Dalke
Washington Health Care Authority

Dear Mr. Jensen and Ms. Dalke:

I write on behalf of the membership of the American Cochlear Implant Alliance regarding the forthcoming rules for the implementation of Medicaid coverage for cochlear implants for adults. The ACI Alliance is a non-profit organization of cochlear implant (CI) clinicians (surgeons, audiologists, speech language pathologists, and more), parents of children with hearing loss, adults with hearing loss, and educators of children who are deaf and hard of hearing.

Our organization worked closely with the Washington State Medical Association and Washington State CI clinicians on this effort and have done so in several other states as well. We are pleased that Washington State will be joining the majority of states in providing coverage of this life changing device to adults who are Medicaid beneficiaries. We would like to comment on the proposed clinical coverage standards.

As proposed, the guidelines for criteria outlined are for children, which differ for adults. If applied to adults, they are outdated and differ markedly from those utilized for CI coverage under Medicare and the Department of Veterans Affairs. The proposed criteria are also much more restrictive than the FDA criteria that have been in effect for more than ten years, which are followed by most private health insurers.

A recent resource that details the current FDA criteria for all available CI devices is the November 2012 paper, *Determining Cochlear Implant Candidacy in Adults: Limitations, Expansions, and Opportunities for Improvement* by Teresa A. Zwolan PhD and Gregory Basura MD. The adult candidacy criteria for cochlear implantation cited in this peer reviewed paper are significantly broader than those cited in the rule as currently proposed. These criteria are similar to those adopted in the September 2022 National Coverage Determination issued by the Centers for Medicare and Medicaid Services (CMS) for Medicare coverage. The Zwolan paper is available open access here: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8660165/>.

We recommend that Washington State Medicaid adopt adult candidacy coverage criteria that are similar to those of other insurers, which are **best aided bilateral hearing test scores of ≤60%**. The updated CMS guideline and supporting references may be found here: <https://www.cms.gov/medicare-coverage-database/view/ncacal-decision-memo.aspx?proposed=N&ncaid=306>.

Additional background regarding best practice for cochlear implant evaluation for adults was developed by the Adult Cochlear Implantation Candidacy Task Force of the American Cochlear Implant Alliance. The task force lead author is Daniel M. Zeitler MD, FACS, a cochlear implant surgeon at Virginia Mason in Seattle. The task force guidance was published in the medical journal *Laryngoscope*, which is available here: <https://doi.org/10.1002/lary.30879>.

I urge your office to adjust the proposed adult criteria to better reflect the current standard of care for evaluation of candidacy for cochlear implantation. We also urge you to consider adjusting the criteria for children as well. We are available to support your efforts and answer any questions you may have.

Thank you for offering this life-changing device for adults who may benefit.

Sincerely,

Donna Sorkin MA
Executive Director
American Cochlear Implant Alliance
www.ACIAlliance.org