For Immediate Release – October 5, 2020

American Cochlear Implant Alliance (ACI Alliance) Submits Comments to CMS on Proposed Medicare Reimbursement Reductions and Support of Telehealth Continuance

Washington, D.C.: The American Cochlear Implant Alliance (ACI Alliance) is a not-for-profit membership organization created with the purpose of eliminating barriers to cochlear implantation by sponsoring research, driving heightened awareness and advocating for improved access to cochlear implants for patients of all ages across the US. ACI Alliance members are hearing care clinicians including surgeons, audiologists, speech-language pathologists (SLPs) as well as scientists, educators, adults with hearing loss, and family members.

ACI Alliance submitted comments to the Centers of Medicare and Medicaid Services (CMS) on Proposed Rule, CY 2021 Payment Policies Under the Physician Fee Schedule and Other Changes to Part B Payment Policies (the Proposed Rule) [CMS-1736-P].

Adding Telehealth Services Under Medicare

- The Proposed Rule indicates that telehealth services provided as part of the cochlear implant (CI) procedure are among those that will not be extended past the PHE.

- Having these services available virtually during the PHE has demonstrated the benefit of telehealth services for cochlear implantation for patients and providers. Not only has infection risk been mitigated during delivery of services in the COVID timeframe, outcomes of CI patients have been maintained and even improved.

- Access to telehealth services should remain in place for patients who are unable, or find it difficult, to leave their home—even for medical appointments. Telehealth also addresses the ability to serve those who have limited access to specialized providers in their community such as cochlear implant clinicians who may not exist in many rural or lower socio-economic communities.

- Cochlear implant clinicians report that they are seeing improved outcomes with telehealth as patients are more compliant about attending appointments. Although physicians can provide and bill for time spent on counseling via telehealth for cochlear implant patients, audiology counseling is not covered.

As a result, ACI Alliance strongly encourages CMS to consider adding cochlear implant services to the list of expanded telehealth services. ACI Alliance supports the Emergency COVID-19 Telehealth Response Act, which would ensure that physical therapists, occupational therapists, speech
pathologists, audiologists, and clinical social workers can receive telehealth reimbursement rates from CMS while providing necessary health services.

Reduction in Reimbursement Rates

- The proposed reductions related cuts to reimbursement for key clinicians will impact the ability of some providers to remain operational and/or offer services to Medicare beneficiaries.

- These cuts will have significant impacts on the availability of hearing health services for the Medicare population, particular those living where access to specialty care is already limited.

- With respect to specific services related to cochlear implantation, the proposed cuts to reimbursement rates for certain codes will have lasting impacts. As noted in the Proposed Rule, rural and underserved communities need improved access; cutting reimbursement may force private providers to reassess accepting Medicare patients in order to remain in business.

- The conversion factor adjustment will lead to an estimated 7% cut for audiologists and 9% cut for speech-language pathologists. These cuts will have significant, and potentially detrimental impacts on the availability of hearing health services for the Medicare population.

- The proposed rate reduction will make it significantly more challenging for these medical professionals to provide services to Medicare beneficiaries.

As a result, ACI Alliance strongly urges CMS to reconsider these proposed cuts and do everything possible under CMS’s current authority to eliminate or significantly reduce this financial burden.

Media Contact:
Laura Odato, Director of Operations and Marketing
lodato@acialliance.org; (202) 263-9746