



URGENT ACTION ALERT

File comments by 5-18-17

ACDHH Opposes Over-the-Counter (OTC) Hearing Aids

ACDHH continues to support increased access to quality hearing healthcare including affordable hearing aids dispensed by an Arizona-licensed hearing healthcare professional after testing and physical examination of the ear.

History: In May 2012, the ACDHH Board of Commissioners issued a Position Paper opposing uncalibrated online hearing tests and opposing the internet sale of hearing aids. In January 2013, the Commissioners issued a Position Paper recommending health insurance companies provide a minimum \$1500 per ear every 3 years to their insureds. In October 2013, the Board issued a Position Paper supporting patient-specific verification of hearing aid performance as part of the fitting process and this requirement became AZ state law. In February 2017, the Commissioners issued a Position Paper encouraging the FDA to reinstate enforcement of the Medical Evaluation requirement. ACDHH is currently actively pursuing the development of a statewide program to provide hearing aids to low-income Arizonans throughout the state. In May 2017 the Board issued a Position Paper opposing OTC hearing aids.

Recently, federal legislation was introduced to allow for the sale of hearing aids OTC and the FTC is considering allowing hearing aids to be sold OTC: <https://www.ftc.gov/news-events/events-calendar/2017/04/nor-hear-competition-innovation-consumer-protection-issues>

Hearing aids are medical devices prescribed by a hearing healthcare professional with years of training and education. Consumers are not able to accurately self-diagnose the level of their hearing loss, nor are they able to detect FDA red flag conditions warranting medical care.

Examples of FDA Red Flag and other Medical conditions:

- Ear wax compaction, sudden hearing loss, unilateral hearing loss, asymmetric hearing loss
- Ear infection, possible conductive loss component, acoustic neuroma, tinnitus, etc.

Problems with OTC hearing aids:

- No service or support (no test, no fitting, no ear molds, no programming, no counseling)
- Lack of hearing healthcare professional expertise and physical exam
- Parents may use them for children

Talking points:

- If hearing aids are provided OTC, why would insurance companies pay for them?
- If a free hearing test is provided online, why would insurance companies, including Medicare, pay for one?

SUBMIT YOUR COMMENTS REGARDING OTC HEARING AIDS ONLINE BY MAY 18TH HERE:

<https://ftcpublishcommentworks.com/ftc/hearinghealthtechworkshop/>

Contact ACDHH at info@acdhh.az.gov for more info