



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

75TH ANNIVERSARY
1925-2000

March 27, 2001

Terrence L. Kay, Director
Division of Practitioner and Ambulatory Care
Purchasing Policy Group
Center for Health Plans and Providers
Health Care Financing Administration
7500 Security Boulevard
Baltimore, MD 21244-1850

RE: Medicare payment for cochlear implant speech processor programming

Dear Mr. Kay,

On behalf of the members of the American Speech-Language-Hearing Association (ASHA), I am writing to request revisions to Medicare policy relating to cochlear implant speech processor programming. ASHA is the national professional association representing more than 99,000 audiologists, speech-language pathologists, and speech, language, and hearing scientists nationwide.

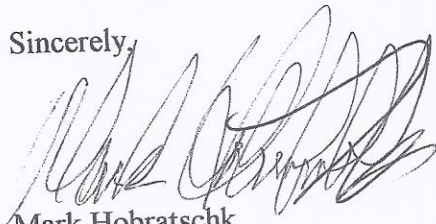
Enclosed please find ASHA's position statement regarding this critical issue. This statement was prepared subsequent to our February 14, 2001 meeting with representatives from your division and the Program Integrity Group.

As you may be aware, programming of the cochlear implant speech processor is separate and distinct from aural rehabilitation. Proper programming of the processor is essential to ensure the safety and effectiveness of the device, including the prevention of hazardous facial nerve stimulation.

HCFA has consistently recognized that programming is a "unique" service for which Medicare rules and regulations were not designed. ASHA is very concerned that existing policy (in particular the inaccurate designation of programming as a "therapeutic" service) inadvertently restricts access to this service for Medicare beneficiaries. We greatly would appreciate HCFA's careful consideration of these proposed revisions, and would like to meet with yourself and your staff in the near future to provide any additional information and work with the agency in revising Medicare policy to ensure programming is fully accessible to cochlear implant beneficiaries.

I will be in contact with your office shortly regarding potential meeting dates. In the interim, please feel free to contact me at (301)-571-0482 or via e-mail at mhobratschk@asha.org.

Sincerely,



Mark Hobratschk
Director of Health Care Financing Advocacy

Enclosure

cc: Terri Harris, Division of Practitioner and Ambulatory Care
Lauri Feinberg, MD, Center for Health Plans and Providers
Dorothy Shannon, PhD, Program Integrity Group
Francina Spencer, Center for Health Plans and Providers