

**From the Desk of Michele Michaels, Phoenix, AZ – May, 2017**

My comments to the FTC regarding Over-the-Counter Hearing Aids (OTC HA) are as an educated private citizen who is hard of hearing and who has worked in the field of hearing loss (in a non-medical capacity) for 24 years. I am a member of the Hearing Loss Association of America and the Association of Late-Deafened Adults. I am not an audiologist or hearing aid dispenser. I do not sell hearing aids now nor will I in the future. I do not sell consumer electronics products including Personal Sound Amplification Products (PSAPs) now nor will I in the future.

I do not support hearing aids being sold OTC. I have arrived at this decision after watching the disruption in the hearing aid industry these past several years and after having read about and researched all sides of this issue for months, including having numerous conversations with hard of hearing consumers about the issue. Consumers need health insurance, including Medicare, to cover hearing aids and services. That is the answer to the problem of access and affordability – not OTC HA.

In my work, I assist consumers with hearing loss through education, connecting them to resources, and removing systemic barriers. I know there are some people who need and want hearing aids and cannot afford them. There are many more who need them and can afford them but still do not want to buy them because of vanity, stigma, or most commonly, the belief that their hearing loss ‘isn’t really that bad’. Many people do not understand the importance of their hearing and the relation between hearing loss and other co-morbidities, including possible early dementia. Hearing healthcare is very important and should be fully covered by health insurance companies, and the public perception of hearing loss needs to change through a massive non-profit-driven public education campaign. That is the real issue here, and this is the answer to the problems of accessibility to and affordability of hearing aids and services.

In my decades of work with hard of hearing people, it is the low-income consumers who have moderate or worse hearing loss who call for financial assistance in obtaining hearing aids. It is not the consumer with mild hearing loss. People with mild hearing loss don’t know they have hearing loss and if they have an inkling, they are unconcerned and are not about to purchase hearing aids. Thus, an OTC HA for mild loss will not be a popular item and will not increase adoption rate. The safety and efficacy of OTC HAs has not been established through research and may harm a consumer with mild or moderate hearing loss. Moreover, if the OTC HA doesn’t work, the consumer will believe hearing aids don’t work and will put them in the drawer. The government will thus have given credence to an OTC HA device that didn’t help. Alas, we will lose another generation to the belief that hearing aids are ineffective. At least with PSAPs, the consumer isn’t led to believe that it is a hearing aid.

I could make other arguments against OTC HA: Consumers need hearing healthcare professionals who can diagnose FDA red flag conditions and perform accurate hearing tests to include bone conduction. People already have easy access to readily available hearing enhancement devices and low-cost hearing aids over the internet. I’ve read that OTC HA are like reading glasses. This improper analogy perpetuates the falsehood that these two things are similar. They are not. Hearing aids are sophisticated medical devices and not simply amplifiers. I am also very concerned that parents will buy an OTC HA for their children.

One of my most significant concerns about making HA available OTC is the impact on health insurance coverage of hearing healthcare. Why would a health insurance company cover hearing aids and services

if they are available OTC for free or low-cost? A hearing aid should remain a separate category of medical devices whose intent is to treat hearing loss and it should be covered by health insurance.

As an HLAA member, I find it interesting that the national HLAA office supports OTC HA, however they did not poll their members on this issue prior to arriving at their position and many of their members do not support this initiative. Research clearly shows that consumers value the assistance of skilled hearing healthcare professionals and value high quality hearing aid technology. Yet there is no research that supports the safety and efficacy of OTC HA. An OTC HA will jeopardize consumer health and safety, to say nothing of their pocketbook.

To recap: Access to low-cost hearing aids already exists, both online and through local dispensers. Access to good quality PSAPs already exists and PSAPs are improving and becoming more widely available. Persons with mild hearing loss do not want to buy hearing aids. Persons with moderate hearing loss need the skill of a licensed professional hearing healthcare provider. Insurance companies need to step up and cover hearing healthcare. Consumer education needs to occur on a national scale. Government has the responsibility to do the right thing, and the right thing is not OTC HA.

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