



Oslo, January 2022

Access to Universal Hearing Healthcare is a Human Right

European Federation of Hard of Hearing People (EFHOH) statement on emergence of the Over The Counter Hearing Aids category (OTC-HA).

We are concerned with the direction OTC-HA leads and the potential loss of quality of hearing care and erosion of rehabilitation support.

Hard of hearing people require rehabilitation and accessibility measures, as well as hearing aids and assistive technologies to achieve their full potential and independent life. Providing well-fitted hearing aids by hearing care professionals should be the way to fulfil the requirements of UNCRPD Article 25 (b), not placing the responsibility for own hearing ability at the hands of person experiencing hearing loss.

In 2015 the EFHOH members have signed Essen Declaration, reminding that EU member states must comply with UNCRPD Article 25 Health, to give the right of persons with disabilities to attain highest standard of healthcare without discrimination, including hard of hearing and deafened people. The Essen Declaration states:

“All persons have a right to equal opportunity in the world. For 51 million hard of hearing people in the European Union this right can be best fulfilled through state-funded provision of hearing aids and the proliferation of assistive listening devices (ALD). For these many millions of people, including children and youth access to hearing aids is access to opportunity.

On behalf of the 51 million Europeans with hearing loss¹, the European Federation of Hard of Hearing People (EFHOH) Annual General Meeting in Essen, Germany is calling for all Member States to guarantee access to affordable, good quality, professionally approved hearing aids, ALD and the training and support standards to use them successfully. No one should be priced out of equal opportunity”.

We would like to point towards the recent findings from World Health Organisation, on the global return on investment and effectiveness of **WHO HEAR** interventions on hearing loss², presenting that for every 1\$ spent on hearing care interventions, the society will gain back \$16.

Therefore, the investment in the hearing aids reimbursement and quality of hearing care as part of the universal healthcare provisions is a sound investment.

¹ European Federation of Hard of Hearing People, 2015

² Tordrup D, Smith R, Kamenov K, Bertram M, Green N, Chadha S, WHO HEAR group. Global return on investment and cost-effectiveness of WHO's HEAR interventions for hearing loss: a modelling study. The Lancet – Global Health. Vol 10, January, 2022, p e52-e62. DOI:[https://doi.org/10.1016/S2214-109X\(21\)00447-2](https://doi.org/10.1016/S2214-109X(21)00447-2)



Rationale.

Hearing aids are medical devices which are part of hearing rehabilitation interventions, and NOT consumer electronic gadgets. One of the primary challenges associated with over-the-counter and self-fitting hearing aids is that all of the control is placed into the hands of the consumer.

Some people might turn to OTC-HA because the hearing aids reimbursement is far too low to be affordable, or they are unsuccessful with hearing aids, mostly because the hearing aids do not fit properly, the hearing aids are not programmed accurately, and the hearing aid technology does not meet the person's needs. This is why it's important that hearing aids are selected based on a well-informed choice, fully involving the client and fitted by audiological professionals, who practice the ISO 21388 standard "Hearing aid fitting management (HAFM)"³ and the levels of hearing aids reimbursement are significantly increased or even fully covered as recommended by the Essen Declaration.

EFHOH states clearly that hearing aids that is offered, must be fitted by audiological professionals, and the devices provided must meet criteria of the EU Medical Directive Regulation.

From a hearing aid user perspective there is also the need to address that rehabilitation is much more than hearing aid fitting, as clearly documented for WHO in ICF Core Set for Hearing Loss⁴. We therefore highly recommend quality (traditional) hearing aid fitting by audiological professionals and not OTC-HA (over the counter-hearing aids)

The fitting of hearing aids is a process of several weeks and months in which the most suitable hearing aid is identified and the optimal settings for daily life are set. First, the audiological profile is determined by measuring the severity and the type of hearing loss and the individual needs are assessed. The evaluation of the success of hearing aid fitting is based on three pillars:

- technical verification of the hearing aid fitting
- audiometric measurements with and without hearing aid
- assessment of everyday hearing by the user based on questionnaire inventories (validation)⁵

The World Health Organisation (WHO) with their report⁶ on disability and health is pointing out that many medical professionals have limited understanding of disability, and what it takes to include people with disabilities in their treatment, including persons who are hard of hearing. The way to go is not to shift the responsibility on people to treat themselves but to improve quality of existing hearing care services.

³ ISO 21388:2020 - Acoustics — Hearing aid fitting management (HAFM): <https://www.iso.org/standard/74602.html>

⁴ <https://www.icf-research-branch.org/icf-core-sets-projects2/other-health-conditions/icf-core-set-for-hearing-loss>

⁵ Hoppe U and Hesse G. Hearing aids: indications, technology, adaptation, and quality control. GMS Current Topics in Otorhinolaryngology - Head and Neck Surgery 2017, Vol. 16, ISSN 1865-1011 <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5738937/pdf/CTO-16-08.pdf>

⁶ <https://www.who.int/news-room/fact-sheets/detail/disability-and-health>



Action Points for Member States

The investment in the quality of hearing care as part of the universal healthcare provisions is a sound investment.

1. Develop and adopt a strategy on hearing loss and deafness, that focuses on equality, prevention and rehabilitation to enable hard of hearing people equal opportunities.
 - a) The strategy should include universal reimbursement/ provision of hearing aids and rehabilitation which does not put undue burden of hard of hearing citizens.
 - b) The strategy should be led by the experts who are working in the field and who are in direct consultation with hard of hearing people organizations.
2. Develop a plan to increase awareness of hearing loss among older people care professionals - Conduct research on hearing loss (including research on prevention and rehabilitation) and produce relevant statistics to improve wellbeing and independence.
3. Ensure hard of hearing patients have access to hearing care and rehabilitation services to allow them to continue full and independent lives.
4. Develop tools for inclusive and person centred hearing care services based on good practice and recommendations in cooperation with organisations and experts representing hard of hearing and deafened people.
5. Mandate implementation of the ISO 21388 standard “Hearing aid fitting management (HAFM)” to be the national services benchmark for the minimum standards on services offered by hearing aid professionals.

On behalf of EFHOH Board

President

Lidia Best

About EFHOH: The European Federation of Hard of Hearing People represents interest of 57 million of hard of hearing people in Europe. Our aim is a Europe where hard of hearing people can live without barriers and participate at all levels of society. Our members are national organisations for hard of hearing and deafened people.