

December 20, 2010

Ms. Katherine K. Wallman
Chief Statistician
Office of Management and Budget
10201 New Executive Office Building
Washington, DC 20503

Dear Ms. Wallman:

As the world's largest professional organization of, by and for audiologists, with over 11,000 members, the American Academy of Audiology (the Academy) appreciates the opportunity to comment on the routine review of North American Industry Classification System (NAICS) codes by the Economic Classification Policy Committee (ECPC). For the reasons outlined below, it is the Academy's position that the profession of Audiology should be represented by a unique six-digit NAICS code, rather than the current practice, in which it is categorized alongside a variety of occupations, existing in various fields of practice and expertise. We believe that our current classification does not reflect the qualifications, level of education, scope of practice, and expertise of audiologists. Additionally, other Federal agencies have recognized the need to update the classification of audiologists in their systems.

As of January 1, 2010, Audiologists have their own broad occupation category within the Standard Occupational Classification (SOC) system. Audiologists are categorized under the major group "Healthcare Practitioners and Technical Occupations (29-0000)" and in the minor group (29-1000), "Health Diagnosing and Treating Practitioners," as a separate and distinct profession. Audiologists were previously categorized in the broad occupation of Therapists (12), but, as a result of an appeal by the Academy, the Office of Management and Budget (OMB) granted audiology a unique broad occupation category (18).

Audiologists diagnose, manage, and treat both hearing and balance disorders and have functioned in this capacity since the advent of state licensure laws that have evolved over the past 30 years. In today's health-care environment, the audiologist is the individual who provides audiologic diagnosis regarding hearing and balance disorders. The audiologist performs an evaluation, provides appropriate treatment, and refers the patient, if indicated, for medical assessment. Therefore, it was the Academy's position, and subsequently that of OMB, that the former classification was inaccurate based on the relationship that audiologists have with their patients, on recognition of audiologists by state licensure boards, as well as acknowledgement by the health-care community.

Audiologists are professionals who hold master's or doctoral-level degrees. The evolution from the previously required master's degree to the Doctor of Audiology degree (AuD), the current entry-level degree required for all new audiologists, was necessitated by an expanding knowledge base and improved techniques and technologies to assess and treat hearing and balance disorders. The transition of audiology to the doctoral level began nearly 25 years ago with establishment of the framework for the educational underpinnings of the degree. The AuD is currently awarded by 75 academic institutions in the United States, including some of the most recognized health-care training universities in the country. The curricula offered at these institutions qualify audiologists as uniquely educated and trained in the evaluation, assessment, diagnosis, management, treatment and prevention of hearing and balance problems. These programs provide rigorous theoretical and clinical education and training in the area of hearing aids and hearing assistive technologies. Audiologists are regulated by state licensure or registration in all fifty states and the District of Columbia.

Based on the information provided above, it is the Academy's position that audiology warrants a separate NAICS code; similar to that which exists for optometry (621320), a profession more closely aligned with audiology. We hope that the ECPC will consider favorably a modification to the NAICS, resulting in consistency with the SOC system, in designating audiology with its own code, better reflecting the classification of the services that audiologists provide.

Again, we thank you for this opportunity to comment. Please contact Melissa Sinden, Senior Director of Government Relations, at 202-544-9335, or by email, msinden@audiology.org, if you should need additional information or clarification regarding the Academy's comments.

Sincerely,

A handwritten signature in black ink that reads "Patricia B. Kricos". The signature is written in a cursive, flowing style.

Patricia B. Kricos, PhD
President

Cc: Mr. John B. Murphy