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July 21, 2014

Mr. John B. Murphy  
Chair, Economic Classification Policy Committee  
U.S. Census Bureau  
SSSD HQ-8K157  
4600 Silver Hill Road  
Washington, DC 20233

Dear Mr. Murphy:

The American Academy of Audiology (the "Academy") is the world's largest professional organization of, by, and for audiologists, representing over 12,000 members. The Academy promotes quality hearing and balance care by advancing the profession of audiology through leadership, advocacy, education, public awareness, and support of research. The Academy appreciates the opportunity to offer comments in response to the Economic Classification and Policy Committee's (ECPC) notice of solicitation for proposals to revise portions of the North American Industry Classification System (NAICS) for 2017.

The Academy recognizes that the NAICS was developed to be a dynamic industry classification; thus the need to review the classification every five years to identify new and emerging industries. As such, the Academy would like to draw your attention to changes within the audiology industry that demonstrate a need for the ECPC to review and reclassify our current NAICS designation. The current NAICS code used to classify audiologists is "621340 Offices of Physical, Occupational, and Speech Therapists, Audiologists". It is the Academy's position that classifying audiologists with physical, occupational, and speech therapists does not accurately represent the growth and development of this expanding industry, and that audiology should have its own unique six-digit NAICS designation.

According to the Bureau of Labor Statistics (BLS), employment of audiologists is projected to grow 34 percent from 2012 to 2022, much faster than the average for all occupations<sup>1</sup>. This projected growth is nearly twice that of the 19 percent estimated growth for speech therapists.<sup>2</sup> Growth in the audiology industry is directly related to the increasing number of people with hearing loss. There is strong correlation between hearing loss and aging, and as our population ages, so will the demand for audiology services. The U.S. Census Bureau projects that the number of Americans aged 65 and older will double between 2010 and 2050 to an estimated 88.5 million.<sup>3</sup> Studies predict that the number of Americans with hearing loss will reach 40 million by 2025 and 53 million by 2050.<sup>4</sup> This large-scale projected industry growth distinguishes audiology from the other industries that fall under (621340) and

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<sup>1</sup> <http://www.bls.gov/ooh/healthcare/audiologists.htm>

<sup>2</sup> <http://www.bls.gov/ooh/healthcare/speech-language-pathologists.htm>

<sup>3</sup> <http://www.census.gov/prod/2010pubs/p25-1138.pdf>

<sup>4</sup> <http://www.hear-it.org/35-million-Americans-suffering-from-hearing-loss>

demonstrates that audiology is an emerging industry under the standards set forth by the ECPC for the NAICS.

Projected industry growth is just one example of how audiologists are clearly separable from that of physical, occupational, and speech therapists. The audiology industry also possesses its own specialized labor skills and uses unique and highly specialized technologies, as evidenced by the profession's extensive educational and clinical requirements. Audiologists are master's and doctoral-level professionals, with the Doctor of Audiology degree (AuD), serving as the current entry-level degree requirement. The educational evolution from a master's degree to a doctoral degree was promulgated by an expanding knowledge base and improved techniques and technologies to assess and treat hearing and balance disorders. The AuD is currently awarded by 74 different 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 qualifies audiologists as uniquely educated and trained in the evaluation, assessment, diagnosis, management, treatment and prevention of hearing and balance problems. These programs also provide for rigorous theoretical and clinical education and training in the area of hearing aids and hearing assistive technologies.

Other federal agencies have taken notice of the educational, technological, and clinical advancements of the profession and have modified their own classification systems to more accurately reflect the role of audiologists as independently practicing diagnosticians. Most recently, the Office of Management and Budget (OMB) granted audiology its 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. Previously, audiologists were categorized in the broad occupation of Therapists (12).

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. According to the NAICS, the optometry industry "comprises establishments of health practitioners having the degree of O.D. (Doctor of Optometry) primarily engaged in the independent practice of optometry."<sup>5</sup> The NAICS industry description for optometry defines optometrists as providing "eye examinations to determine visual acuity or the presence of vision problems and to prescribe eyeglasses, contact lenses and eye exercises."<sup>6</sup> From this description, it is clear that audiologists mirror optometrists in education, level of independence, and scope of practice. For that reason, the Academy urges the ECPC to create a separate and unique NAICS classification for audiologists, similar to that of optometry, rather than to continue to categorize audiologists alongside a variety of occupations existing in different fields of practice and expertise.

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<sup>5</sup> <http://www.naics.com/censusfiles/ND621320.HTM>

<sup>6</sup> <http://www.naics.com/censusfiles/ND621320.HTM>

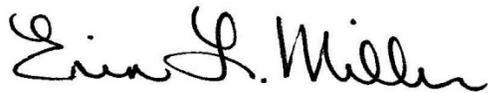
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The Academy hopes that the ECPC will consider a modification to the NAICS in designating audiology with its own code, better reflecting the projected growth of the industry, a more accurate classification of the services that audiologists provide, and greater consistency among federal agencies. We thank you for this opportunity to comment. Please contact Kate Thomas, assistant director of state, federal, and political affairs at 202-544-9336 or [kthomas@audiology.org](mailto:kthomas@audiology.org) if you should need additional information or clarification regarding the Academy's comments.

Sincerely,

A handwritten signature in black ink that reads "Erin L. Miller". The signature is written in a cursive, flowing style.

Erin L. Miller, AuD

President

American Academy of Audiology