

AMERICAN ACADEMY OF AUDIOLOGY

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April 16, 2009

The Honorable Dave Jones, Chair
Assembly Health Committee
State Capitol, Room 6005
Sacramento, CA 95814

Dear Chairman Jones:

On behalf of the American Academy of Audiology, I would like to offer our support for AB 1535 that is currently under consideration by the California legislature. This bill would amend Sections 2530.2 and 3351.3 of the Business and Professions Code, relating to audiologists. AB 1535 would eliminate the need for audiologists to hold a separate hearing instrument dispensing license and would define the practice of audiology to include the selling of hearing aids. This legislation would exempt audiologists from the hearing aid dispenser licensure requirements.

The Academy is the world's largest organization of audiologists with over 10,000 members who provide the highest quality of hearing healthcare service to children and adults. 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 has clinical practice documents that specifically address the best practices in the provision of amplification (hearing aids) to both children and adults. These documents, including the Academy's Pediatric Amplification Practice Guidelines, exemplify the knowledge, skills and abilities of audiologists to provide the highest level of hearing aid care. Further, the great majority of research in the development, selection, fitting and verification/validation of hearing aids has been conducted and published by audiologists, many of whom are California licensees.

Audiologists are uniquely trained and educated in the evaluation, assessment, diagnosis, management, treatment and prevention of hearing and balance problems. The preparation for entry into the profession of audiology allows for rigorous theoretical and clinical education and training in the area of hearing aids and hearing assistive technologies. At

the minimum, all audiologists hold master's degrees and complete clinical practicums. To further meet the demands of new technology and increased treatment modalities, the audiology curriculum has been mandated to be a doctoral-level program by the year 2012. Audiologists fulfill at least nine months of full-time internship and pass a national certifying examination. Passage of AB 1535 is consistent with the skills and knowledge possessed by audiologists by virtue of the scope of practice outlined in the requirements for an audiology license in California.

Audiologists are regulated by licensure or registration in all 50 States. In 35 of those states, audiologists are currently able to dispense hearing aids and hearing assistive technology under their audiology license. These states recognize that the education and training of audiologists ensures consumer protection in the evaluation, selection, fitting, selling, and provision of counseling and follow-up care, without requiring a separate license, by virtue of the rigorous nature of the curriculum of graduate programs in audiology. This training and experience assures that consumers have access to rigorous audiologic diagnostic and treatment services, including the provision of personal hearing instruments, provided by audiologists under their licenses.

Requiring audiologists to hold two licenses is an undue burden, and further confuses consumers as to which licensing board a complaint should be directed. Managing consumer complaints effectively is rendered difficult by the lack of clarity as to which board should be approached to file a complaint.

Therefore, the Academy believes that audiologists should be exempt from taking an additional exam for the purpose of a dispensing license, as this is duplicative of requirements currently included in the audiology license, and does not increase consumer protection. If you have any questions, contact Melissa Sinden, Senior Director of Government Relations at 202-544-9335 or msinden@audiology.org.

Sincerely,

A handwritten signature in black ink that reads "M. Patrick Feeney". The signature is written in a cursive, flowing style.

M. Patrick Feeney, Ph.D.
President

cc: The Honorable Mary Hayashi, Chair
Assembly Business and Professions Committee
State Capital Room 3013
Sacramento, CA 94249-0018

