

February 22, 2021
The Honorable Theresa Mah
270-S Stratton Office Building
Springfield, IL 62706

Re: Opposition to HB 3102: Licensure of Audiology Assistants

Dear Representative Mah:

On behalf of the American Academy of Audiology (the Academy) I write to you to express our opposition to HB 3102, legislation that would establish licensure for audiology assistants. The Academy is the largest professional organization of, by and for audiologists, in the world. The Academy promotes quality hearing and balance care by advancing the profession of audiology through leadership, advocacy, education, public awareness and support of research.

State Licensing of Audiology Assistants Not Necessary to Protect Consumer Health and Safety

The American Academy of Audiology does not see a necessity for state licensing of audiology assistants since these individuals should only work under the supervision of a state-licensed audiologist. The creation of a separate state licensure category for these types of support personnel is not necessary to protect consumer health and safety and would impose additional costs to the state and actual practitioners. The creation of this separate licensure category may also be an impediment or barrier to persons wishing to pursue this job role or career.

The duties and responsibilities of audiology assistants should be delegated only by supervising audiologists and the supervising audiologist should assume the legal and ethical responsibilities of all assigned activities that the audiology assistant provides. A less burdensome and low- cost alternative to licensure would be registration for audiology assistants. Under this option, the state would maintain a list of audiology assistants so that they could be contacted in the event of a complaint. Registration could also be combined with minimum standards that may consist of a required level of education and a character reference.

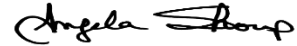
The Academy does not support the creation of a separate licensure category for audiology assistants but would also like to highlight the fact that we do not support the inclusion of any private certification as a pathway to state licensure. HB 3102 lists proof of the American Speech-Language-Hearing Association (ASHA) certification as an audiology assistant as a pathway to Illinois state licensure. Inclusion of a private certification as a direct pathway to licensure is not necessary and may serve as a conflict of interest.

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Thank you very much for allowing us to express our thoughts on this legislation. If you have any further questions about any of the information expressed in this letter, please contact Susan Pilch, JD, Senior Director of Government Relations at spilch@audiology.org.

Sincerely,

A handwritten signature in black ink that reads "Angela Shoup". The signature is written in a cursive style with a large, stylized initial 'A'.

Angela Shoup, PhD

President, American Academy of Audiology