

February 23, 2021

The Honorable Todd Gardenhire  
425 Rep. John Lewis Way N.  
Suite 732 Cordell Hall  
Nashville, TN 37243

***Re: Opposition to SB 665***

Dear Senator Gardenhire:

On behalf of the American Academy of Audiology (the Academy) I write to you to express our opposition to SB 665, legislation that would add cerumen management by a person who has completed a cerumen management course approved by the International Hearing Society within the definition of the scope of practice of dispensing and fitting hearing instruments. 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.

**Critical Differences Exist Between Education/Training of Hearing Instrument Specialists and Audiologists**

In order to become a hearing instrument specialist in Tennessee, an applicant must be 18 years of age, complete two years of college-level course work and either pass an exam or complete an apprenticeship. At this time, the scope of practice for these individuals is limited to non-invasive tasks and skills associated with the fitting of a hearing aid. This legislation would significantly expand this scope of practice to include an invasive procedure on the basis of the completion of a short-term course or workshop.

In comparison, audiologists are doctoral-level professionals who undergo four years of rigorous post-graduate education. This includes academic education, clinical training, and a required national exam. They are qualified to detect underlying medical conditions; to perform cerumen management; and to diagnose and treat tinnitus, hyperacusis, vestibular issues, auditory processing disorders, and hearing loss. Audiologists undergo extensive training in cerumen management and work with hundreds of patients before they are allowed to obtain a professional license and perform these procedures independently.

**Cerumen Management Requires Extensive Training and Experience**

Cerumen removal also requires extensive training in the anatomy and physiology of the ear canal, pathologies of the ear, and visual inspection techniques. The procedure requires extensive experience in the use of metal curettes, stainless steel alligator forceps, irrigation equipment, and/or suctioning equipment. Current educational and training requirements for hearing aid dispensers do not typically include cerumen management. Allowing this procedure to be performed by individuals without proper training puts the consumer at an increased risk for sustaining harm.

February 23, 2021

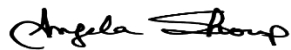
Page 2

### **Conclusion**

The Academy believes the skills needed to perform these specialized services cannot be obtained through a short-term workshop as proposed by this amended legislation. For this reason, the Academy believes that expanding the scope of practice for hearing instrument specialists to include cerumen management would not be in the best interests of Tennessee consumers.

Thank you for the opportunity to provide these comments. If you have any questions about any of the information contained in this letter, please contact Susan Pilch, Senior Director of Government Relations at [spilch@audiology.org](mailto: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