

5/13/2025

Representative Dennis Riddell
300 N. Sailsbury Street, Rm. 419B
Raleigh, NC 27603-5925

Submitted via email: Dennis.Riddell@ncleg.gov

Dear Representative Riddell,

The American Academy of Audiology appreciates the opportunity to provide our feedback on North Carolina House Bill 926. The Academy is the largest organization of, by, and for audiologists. We are dedicated to providing quality hearing and balance care services through professional development, education, research, and increased public awareness of hearing and balance disorders.

On behalf of the Academy, I am writing to express our strong support for HB 926, a necessary modernization of the North Carolina General Statutes. This legislation eliminates outdated and duplicative licensure requirements for qualified Masters-level audiologists, resolves regulatory inconsistencies regarding Audiology Assistants, and introduces critical consumer protections related to the sale of locked hearing aids.

Solving Unnecessary Administrative Burdens for Audiologists

This legislation removes the outdated dual-licensure requirement for audiologists with master's degrees—professionals who have practiced in North Carolina for nearly two decades. Before 2007, this degree was the state's accepted entry-level credential for audiologists, and those who entered the profession under that standard have since built long-standing careers and deep clinical expertise. Despite their qualifications and experience, these audiologists must continue to maintain an additional license to dispense hearing aids, while their doctoral-level peers are not. HB 926 resolves this inconsistency, ensuring that all licensed audiologists in North Carolina, regardless of degree type, are held to the same professional standard for dispensing hearing aids, without unnecessary regulatory duplication.

Appropriately Regulating Assistants

HB 926 also seeks to modernize statutes by removing outdated and conflicting references to Audiology Assistants (AAs), since they are already clearly defined and regulated under Article 22 of Chapter 90¹. AAs in North Carolina are registered with the Board of Examiners for Speech-Language Pathologists and Audiologists (NCSLPA) and work exclusively under the supervision of a licensed audiologist. They do not fit or dispense hearing aids, and they do not practice independently. This legislation does not change the role or supervision of AAs, rather, it clarifies the statute by removing redundancy and reinforcing appropriate regulatory oversight. The supervising audiologist remains legally and ethically responsible for all services provided by

¹ North Carolina Board of Examiners for Speech-Language Pathologists and Audiologists. (2019, September). *Licensure Statute* [PDF]. <https://ncboeslpa.org/wp-content/uploads/2019/09/LicensureStatute.pdf>

an assistant, and that responsibility is already embedded in both state law and professional standards.

Opponents of this legislation have raised concerns that if passed, AAs will be allowed to act outside the scope of their training and dispensing hearing aids without proper supervision. These claims are unsubstantiated and misrepresent both legal reality and clinical practice. The American Academy of Audiology, in its official 2021 Position Statement on AAs, affirms that assistants should only perform duties delegated and supervised by licensed audiologists, and that there is no need for separate state licensure of these support personnel. Creating parallel or overlapping regulations would only introduce confusion and imply independent practice where none exists².

Consumer Protections for Locked Hearing Aid Sales

Many consumers are unaware that some retailers sell prescription hearing aids equipped with proprietary, or “locked,” fitting software. These locked devices can only be programmed or adjusted by the original seller or affiliated provider, meaning patients must return to that specific retailer for any follow-up care or service. This practice limits consumer autonomy and creates a closed system in which individuals cannot seek care from another qualified audiologist or dispenser, even when it may be in their best interest to do so. As a result, consumers may be left with fewer options for care and potentially higher long-term costs, without ever having been informed of these restrictions at the time of purchase.

HB 926 takes a balanced approach to this issue by requiring that any dispenser, whether an audiologist or hearing aid specialist, who sells a locked hearing aid provide written disclosure of this limitation at the time of sale. This provision does not prohibit the sale of locked devices but ensures consumers have all the information before purchasing hearing aids. Adding this transparency protects patients' right to appropriately choose their medical devices and providers in hearing healthcare services across North Carolina.

Conclusion

For these reasons, the Academy strongly urges you to pass HB 926. This legislation modernizes North Carolina's hearing healthcare by reducing regulatory confusion, upholding professional standards, and protecting patient choice. We commend the sponsors and urge you and your colleagues to support HB 926 and help move this important legislation forward. Thank you for your attention and leadership on this issue. Should you have any questions or wish to discuss these concerns further, please feel free to reach out to Joanne Zurcher, MPP, VP of Government Relations & Policy at jzurcher@audiology.org. Thank you for your time and thoughtful consideration.

Sincerely,



Patricia Gaffney, AuD, MPH
President of the American Academy of Audiology

² American Academy of Audiology. (2021, March). *Position Statement: Audiology Assistants* [PDF]. https://www.audiology.org/wp-content/uploads/2021/05/Position_Statement-Audiology_Assistants_Final-3.2021.pdf