



International Hearing Society

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June 03, 2014

The Honorable Irene Bustamante Adams
Chair
Sunset Subcommittee of the Legislative Commission
3800 Reflection Way
Las Vegas, NV 89147-4442

The Honorable Pat Spearman
Vice Chair
Sunset Subcommittee of the Legislative Commission
5575 Simmons Street
North Las Vegas, NV 89031-9009

Dear Chair Bustamante Adams and Vice Chair Spearman:

On behalf of the International Hearing Society (IHS), I am writing today in opposition to a proposal that has been put forth by the Nevada Board of Examiners for Audiology and Speech Language Pathology to merge the Nevada State Board of Hearing Aid Specialists with the State of Nevada Board of Examiners for Audiology and Speech Language Pathology. Furthermore, I am urging the legislature to maintain equal licensing standards for all individuals dispensing hearing aids. The International Hearing Society, founded in 1951, is a professional membership organization representing hearing aid dispensing professionals worldwide. IHS' membership and leadership include both hearing aid specialists and audiologists.

Merging boards of disparate professions inevitably weakens the ability of the board to concentrate on any one issue. The function of a merged board is further impaired by having one profession serving in an oversight and regulatory capacity for other professions of which they have little knowledge. For instance, merging the boards in question here would result in Hearing Aid Specialists providing oversight for Speech Language Pathologists and Speech Language Pathologists responsible for determining what is appropriate or inappropriate in dispensing hearing aids. Neither of these professions are trained or have expertise in the other profession's field, nor should they, but with a merged board they would be responsible not only for licensing, but oversight and discipline of a profession with which they are unfamiliar.

In addition, I want to take this opportunity to urge the legislature to reject any attempts to weaken licensing requirements. Audiologists receive a broad education covering many aspects of hearing health, but hearing aid dispensing is a specialty requiring a unique knowledge base and training. Hearing aid specialists focus only on this specialty—in their training, practices, and continuing education. An audiologist, however, is concerned with a wider variety of issues and, as a necessity, is focused less on any single issue—such as dispensing a hearing aid. As



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a result, an audiologist's education—which includes issues ranging from vestibular services to cochlear implants to hearing conservation and more—does not alone prepare them to dispense and fit hearing aids. Considering that if procedures are incorrectly performed, or individuals are fitted with an inappropriate or mis-programmed device, harm to the patient may result, all individuals dispensing hearing aids must be properly trained and demonstrate their competence by passing written and practical licensing exams in this specialty.

All individuals dispensing hearing aids should be held to the same testing standards. Licensing examinations, written and practical, exist to demonstrate competency of a subject. The written licensing examination used in Nevada, the International Licensing Examination for Hearing Healthcare Professionals tests at the “analyze and evaluate” cognitive levels. This means that individuals can not only understand and remember the information, but can actively analyze and evaluate that information. These tests show that the knowledge learned through education has not only been retained but that it can be applied to real world situations on a day-to-day and case-by-case basis with patient safety at the forefront. Further, requiring all dispensers—audiologists and hearing aid specialists—to abide by the same rules and consumer protections ensures consistency in standards and protection for patients. Patients should have the peace of mind when they or their family members are being fit for a hearing aid that the professional assisting them is properly trained and will not cause them harm. This peace of mind comes from knowing that all individuals dispensing hearing aids have passed the same stringent licensing exams.

We all share the same goal—to ensure that individuals with hearing loss receive the highest possible level of care. That goal is best accomplished when all providers have proven their competence by passing licensing examinations and are regulated by an independent board. I urge you to reject the proposal to merge the Nevada Board of Hearing Aid Specialists and the State of Nevada Board of Examiners for Audiology and Speech Language Pathology and to maintain licensing examination requirements for all hearing aid dispensing professionals—audiologists and hearing aid specialists. If you have any questions, please contact Michael Grogan at 734-522-7200 or mgrogan@ihinfo.org.

Thank you for your consideration.

Sincerely,

Kathleen Mennillo, MBA
Executive Director

Cc: Members of the Legislative Commission