

Statement for the Record
To the House of Representatives Committee on Veterans Affairs
Health Subcommittee
Regarding H.R. 353

The American Academy of Audiology (Academy) and the American Speech-Language-Hearing Association (ASHA) respectfully submit this joint statement for the record in opposition to H.R. 353, a bill that would permit the VA to hire hearing instrument specialists to deliver hearing health care services that currently can be provided only by or under the supervision of a licensed audiologist. While we appreciate and support the intent of the bill's sponsors to ensure appropriate access to hearing health services by our nation's veterans, we do not believe that the legislation will accomplish this goal or address problems that may exist related to wait times for hearing aids or hearing health care services.

Hearing loss is one of the top service related disabilities for veterans and requires complex and comprehensive treatment. While noise-induced hearing loss is common, veterans frequently present with complex auditory and vestibular pathologies that may be exacerbated by tinnitus, traumatic brain injury, or post-traumatic stress disorder. This complexity is further intensified by the increased number of veterans with combat-related hearing loss.

The provision of hearing aids is neither simple nor straightforward. As with all technologies, the technology of hearing aids is becoming increasingly more complex, and the options beyond hearing aids, such as streaming capabilities, direct audio input, or Bluetooth coupling, are becoming more numerous. Coupled with advances in understanding complex ear-brain interactions, the provision of hearing aids requires advanced education and training to effectively serve our veterans.

Audiologists are doctoral-level professionals who are qualified to evaluate the effects of acoustic trauma and ear injuries on hearing, and to diagnose and treat tinnitus, hyperacusis, vestibular issues, auditory processing disorders, and hearing loss. Audiologists can determine appropriate sound amplification devices and systems as well as select, evaluate, fit and verify the performance of all amplification devices, including hearing aids. More importantly, audiologists are trained to determine the appropriate treatment program for hearing loss—which may or may not include hearing aids—and to evaluate the effectiveness of the treatment. The VA currently employs more than 1,100 audiologists.

Hearing aid specialists are trained in the fitting of hearing aids. While some states require a college-level associates degree as a minimum educational requirement to become a hearing aid specialist, many states still require only a high school diploma. Further, there are no national standards or dedicated curricula that outline the core competencies of a hearing aid specialist. In its testimony before the committee last year on legislation similar to H.R. 353, the Veterans Affairs Administration expressed concern that the lack of standardized education for hearing instrument specialists could lead to fragmented hearing health care services and limit delivery of comprehensive care. Given the minimal training required to become a hearing instrument specialist in comparison to the rigor of training for an audiologist, this provider type is poorly equipped to deliver the level of care that veterans require. Veterans would not be well served by

expanding the list of eligible providers to include hearing aid specialists. Indeed, we believe the legislation could result in a compromise in the quality of hearing health care services that already exists for veterans.

Another career classification for hearing aid specialists as proposed by H.R. 353 is unnecessary and administratively burdensome. Hearing aid specialists can now be hired under the Health Aid and Technician Series 0640 of title 5. The level of education and training for hearing aid specialists is consistent with the knowledge, skills, and abilities of health technicians who work in VA audiology clinics under the supervision of an audiologist. Many VA audiology health technicians are hearing aid specialists. The VA also has the capability to contract services from hearing aid specialists “where timely referral to private audiologists or other VHA facilities is not feasible or when the medical status of the veteran prevents travel to a VHA facility or a private audiologist”. VHA Handbook 1170.02. Section 1170.02 defines the role of the audiology health technician, in part, to increase productivity by reducing wait times, to enhance patient satisfaction, and to reduce costs by enabling health technicians to *perform tasks that do not require the professional skills of a licensed audiologist*. The job of these technicians includes, for example, *checks of hearing aids and other amplification devices, trouble shooting and minor repairs to hearing aids, ear molds and other amplification devices and electroacoustic analysis of hearing aids*. No modification of existing law is needed for the VA to hire or contract with hearing aid specialists, consistent with their scope of practice.

The Academy and ASHA are aware that the VA Office of Inspector General (OIG) report dated February 20, 2014, found that the VA was not timely in issuing new hearing aids to veterans or in meeting timeliness goals to complete hearing aid repair services. We are hopeful that the Veterans Access, Choice, and Accountability Act, enacted on August 7, 2014, will help to address access to care issues that may exist within the VA. Our organizations stand ready to provide assistance to the VA and the committee in developing a sustainable and workable system that ensures quality care and outcomes to our veterans. To that end, we would propose that the committee consider granting the VA the authority to hire more audiologists. There is no shortage of audiologists seeking employment with the VA. We would also propose that the committee consider authorizing additional funding both to hire additional audiologists for the VA and to contract with private audiologists.

The American Academy of Audiology is the world’s largest professional organization of, by, and for audiologists. The active membership of more than 12,000 is dedicated to providing quality hearing care services through professional development, education, research, and increased public awareness of hearing and balance disorders.

The American Speech-Language-Hearing Association is the national professional, scientific, and credentialing association for 182,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. ASHA supports its members through professional development, research, advocacy and public awareness of communication, hearing and balance disorders.

