



January 17, 2024

The Honorable Kevin Jensen
Chair
500 East Capitol Avenue
State Capitol
Pierre, SD 57501-5070

RE: Opposition to HB 1029

Dear Representative Jensen:

On behalf of the American Speech-Language-Hearing Association, I write to oppose HB 1029, which would expand the scope of practice of hearing aid dispensers to encompass services they are not appropriately trained to provide, including cerumen management and aural rehabilitation.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 228,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students. Over 500 ASHA members reside in South Dakota.¹

While we share the desire to reach more individuals in need of cerumen management, ASHA maintains that consumers must have access to a comprehensive hearing evaluation performed by a state-licensed hearing health care professional, such as an audiologist, with an advanced degree. In addition, we maintain that individuals who provide cerumen management must possess the education, training, and skills necessary to evaluate the need for and treatment of conditions associated with excess cerumen.

Audiologist vs. Hearing Aid Dispensers

ASHA-certified audiologists hold a doctoral degree in audiology from a program accredited by the Council on Academic Accreditation (CAA) in Audiology and Speech-Language Pathology of the American Speech-Language-Hearing Association and complete a supervised post-graduate experience during the completion of their doctoral degree courses. All applicants for the Certificate of Clinical Competence in Audiology (CCC-A) have completed coursework in extensive foundational education for anatomy/physiology, research applications into practice, 1600+ hours of clinical experience, and training to treat complex conditions, including cerumen management.²

An audiologist will have completed 8 years of schooling between undergraduate and graduate programs to ensure an educational foundation for the best care to meet patients' needs. To maintain the CCC-A, audiologists must complete ongoing professional development. In contrast, a hearing aid dispenser license in South Dakota only requires the education equivalent to a high school diploma, passing a national examination, and passing a practicum examination approved by the board.

HB 1029 broadly redefines the scope of practice for hearing aid dispensers in a manner inconsistent with their education and training Under Sec. 3, hearing aid dispensers would be allowed to provide, “[I]ntervention necessary to ensure the optimum improvement in hearing ability when utilizing a hearing aid or other hearing instruments.”

Hearing aid dispensers do not receive medical or pharmacologic education. Assessment of communicative function and the role of technology requires a unique skill set acquired by audiologists. While hearing aid dispensers could administer screening questionnaires, communication assessment measures are inappropriate as they would not have the training to counsel on communication strategies or make recommendations based on the findings. As a profession, they test hearing for the sole purpose of fitting hearing aids. They are trained to perform tests but not to interpret results for purposes other than fitting hearing aids or referring for medical management.

ASHA maintains that expanding the hearing aid dispensers’ scope of practice, without significant education and clinical training, could result in the following:

- inappropriate treatment of cerumen resulting in eardrum perforation, which could lead to hearing loss;
- improper referral for cochlear implants, which requires consultation by an otolaryngologist or audiologist to determine appropriate medical intervention; and/or
- misdiagnosis of a hearing condition to the detriment of the consumer.

While HB 1029 states that hearing aid dispensers may only perform the proposed expanded scope only if they pass a national examination and pass a practicum examination beyond the high school diploma, ASHA does not believe this meets the appropriate education, training, and skills necessary to meet the needs of patients requiring cerumen management, or those seeking counseling and aural rehabilitation services.

Thank you for your consideration of ASHA’s position of HB 1029. If you or your staff have any questions, please contact Doanne Ward-Williams, ASHA’s senior director of state affairs, at dwardwilliams@asha.org.

Sincerely,



Tena L. McNamara, AuD, CCC-A/SLP
2024 ASHA President

¹ American Speech-Language-Hearing Association. (2022). South Dakota [Quick Facts]. <https://www.asha.org/siteassets/advocacy/state-fliers/south-dakota-state-flyer.pdf>.

² American Speech-Language-Hearing Association, (n.d.) External Auditory Canal Examination and Cerumen Management. <https://www.asha.org/policy/glksp1992-00034/>.