



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

April 17, 2018

Ms. Loretta Ponton
Executive Director
Speech-Language Pathology, Audiology, and Hearing Aid Dispensing Board
P.O. Box 34540
Reno, NV 89533-4540

Dear Ms. Ponton:

On behalf of the American Speech-Language-Hearing Association, I write to oppose the proposed regulations under Chapter 637B of NAC requiring audiologists to take a written exam for the dispensing of hearing aids while under a temporary license.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 198,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 800 of our members reside in Nevada.

Audiologists hold an advanced degree from an accredited program and have completed the expected clinical hours based on their degree requirements. Applicants for the Certificate of Clinical Competence in Audiology (CCC-A) have completed graduate coursework to assess and treat audiological conditions and a minimum of 1,820 hours of supervised clinical practicum. Audiologists are trained to conduct comprehensive assessments to determine hearing loss, auditory function, balance and related systems, and evaluate, select, and dispense hearing aids. They also assess the candidacy of individuals with hearing loss for cochlear implants and work with medical teams to provide fitting, mapping, and audiologic rehabilitation to optimize the use of these devices.

ASHA believes that the proposed exam is redundant and places an unnecessary burden on audiologists who are already qualified to fit and dispense hearing aids. While there are temporary provisions in place for licensure, once an audiologist completes a doctoral program and associated clinical experience, issuing a temporary license is unnecessary. Therefore, ASHA does not support the additional requirement of a dispensing exam for a fully qualified audiologist. We urge you to remove provisions in the proposed regulations that require an audiologist to take the written dispensing examination required for hearing aid dispensers.

Thank you for your consideration of ASHA's recommendations to the proposed regulations under Chapter 637B of NAC. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director of state association relations, at ecrowe@asha.org.

Sincerely,

Elise Davis-McFarland, PhD, CCC-SLP
2018 ASHA President