

March 27, 2017

The Honorable Jerry Hill  
Chairman Senate Business, Professions and Economic Development Committee  
State Capitol, Room 2053  
Sacramento, CA 95814

**RE: SB 198 (Galgiani): OPPOSE**

Dear Mr Chairman,

The American Academy of Audiology (the "Academy") is the world's largest professional organization of, by, and for audiologists, representing over 12,000 members. The Academy promotes quality hearing and balance care by advancing the profession of audiology through leadership, advocacy, education, public awareness, and support of research. The Academy appreciates the opportunity to offer comments in response to California SB 198, introduced by Senator Galgiani. The Academy has identified a number of concerns with this bill and wishes to offer our strong opposition to the legislation as amended.

This legislation would authorize cerumen management and tympanometry as allowable services to be performed by hearing aid dispensers. Under current state law, these services may only be performed by an audiologist who has received extensive education and clinical training. Hearing aid dispensers are trained to specifically deal with the fitting of hearing aids. The state of California requires that to become a hearing aid dispenser one must be at least 18 years of age, possess a high school diploma, and pass the state practical exam. There are no national standards, qualifications, or dedicated curricula that outline the core competencies of a hearing aid dispenser and ensure that proper educational and training standards have been met with regard to cerumen management and tympanometry.

Comparatively, audiologists are doctoral-level professionals who undergo four years of rigorous post-graduate education. This includes academic education, clinical training, and a required national exam. Further, as the practice of audiology has grown more complex, audiologists are required under California law to participate in a professional internship program, pass the state licensing exam, and earn continuing professional development hours annually. They are qualified to detect underlying medical conditions; to perform cerumen management; and to diagnose and treat tinnitus, hyperacusis, vestibular issues, auditory processing disorders, and hearing loss. Audiologists undergo extensive training in tympanometry and cerumen management and work with hundreds of patients before they are allowed to obtain a professional license and perform these procedures independently. The Academy believes the skills needed to perform these specialized services cannot be obtained through a short-term workshop as proposed by this amended legislation. For this reason, the Academy urges legislators in California to consider the negative effect this proposed policy change, allowing hearing aid dispensers to perform services for which they are not adequately trained, may have on consumers.

The Academy has particular concerns with regard to hearing aid dispensers performing tympanometry. Tympanometry is a battery of tests used to determine the status of the middle ear, and the results can help determine a range of issues, from middle ear pressure disturbances to the presence of tumors of the middle ear. Tympanometry is a diagnostic procedure typically performed by an audiologist to assess the middle ear. It is not a “hearing test” used for the purposes of fitting a hearing aid. This test is considered an advanced aspect of an audiologist’s training and scope of practice due to its complexity and potential for patient harm. Audiologists must take several courses involving tympanometry procedures and findings. They must also participate in multiple clinical experiences to understand and interpret the varied outcomes of this procedure. In order for a hearing aid dispenser to be qualified to perform tympanometry, they would need to undergo extensive education and training, and would need to understand and recognize the diagnosis and treatment of underlying diseases and defects in the ear canal and middle ear before attempting them—aspects of their training that do not exist. The training requirements outlined in the bill’s amended language are vague, inadequate, and do little to alleviate the concerns for patient safety associated with having a non-audiologist hearing aid dispenser perform a procedure that requires changing the air pressure in a patient’s ear. Further, the amendments offered to the original legislation do not require that non-audiologist hearing aid dispensers perform the tympanometry procedure with any level of physician supervision.

Cerumen removal also requires extensive training in the anatomy and physiology of the ear canal, pathologies of the ear, and visual inspection techniques. The procedure requires extensive experience in the use of metal curettes, stainless steel alligator forceps, irrigation equipment, and/or suctioning equipment. Current educational and training requirements for hearing aid dispensers do not typically include cerumen management. Allowing this procedure to be performed by individuals without proper training puts the consumer at an increased risk for sustaining harm.

On behalf of the Academy’s nearly 800 members in the state of California, and the patients they serve, the Academy strongly encourages the California legislature to consider the implications that this proposed legislation may have on consumers of hearing care within the state. We urge you not to advance this legislation to authorize hearing aid dispensers to perform cerumen management and tympanometry.

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Please contact Kate Thomas, senior director of advocacy and reimbursement, by phone 703-226-1029 or via email at [kthomas@audiology.org](mailto:kthomas@audiology.org) should you have any questions regarding the Academy’s comments or position.

Sincerely,



Ian Windmill, PhD  
President, American Academy of Audiology

Chairman Hill  
March 27, 2017  
Page 3

cc: Honorable Cathleen Galgiani  
Members of Senate Business, Professions and Economic Development Committee  
Sarah Mason, Consultant, Senate Business, Professions and Economic Development Committee  
Kayla Williams, Consultant, Senate Republican Caucus