



December 16, 2013

Association of VA Audiologists (AVAA) opposes H. R. 3508

On November 15, 2013, H.R. 3508 was filed by U.S. Representatives Sean Duffy (R-WI) and Timothy Walz (D-MN). The bill seeks to amend Title 38, United States Code, allowing the Department of Veterans Affairs to hire hearing aid specialists internally and to update its contracting policies to allow hearing aid specialists to perform work that currently must be performed by licensed audiologists. The Association of VA Audiologists (AVAA) appreciates the intent of this bill's sponsors to ensure that the Nation's Veterans are given access to quality hearing healthcare. Hearing loss and tinnitus are currently the most common service related disabilities (VA Annual Benefits Report for FY 2012) and the membership of AVAA join Representatives Duffy and Walz in our commitment to provide the highest quality of audiologic care to Veterans seeking help for these conditions. AVAA, however, is opposed to H.R. 3508 as we believe it will fail to achieve the sponsors' stated goal of improving access to the highest quality hearing healthcare.

There are significant differences in the education and training of audiologists and hearing aid specialists. Audiologists earn doctoral level degrees through the completion of eight years of academic and clinical training from accredited universities. Upon completion of this rigorous, formal training, audiologists assume their roles as licensed independent healthcare professionals. Audiologists engage in clinical decision making in order to evaluate, diagnose, treat and manage auditory and vestibular disorders. This level of independent clinical practice is essential to provide the type of multifaceted, comprehensive care needed by many Veterans. H.R. 3508 specifies that hearing aid specialists would be required only to have earned an associate degree or to have completed a basic apprenticeship program. A primary result of the vast differences in academic and clinical training between audiologists and hearing aid specialists is a dramatically reduced scope of practice for the latter. Hearing aid specialists will not be equipped to assume the roles and responsibilities currently being assumed by audiologists in the VA healthcare environment.

H.R. 3508 endeavors to create hiring and contracting capabilities that already exist within VA. Another career classification is not needed because hearing instrument specialists can currently be hired under Health Aid and Technician Series 0640 of Title 5. The level of education and training specified for hearing aid specialists in this bill is consistent with the knowledge, skills and abilities of health technicians hired under job series 0640 and employed in VA audiology clinics. In fact, VA currently employs more than 300 audiology health technicians, of which many are licensed hearing aid specialists.

With respect to contracting services from hearing aid specialists, this capability also currently exists. VHA Handbook 1170.02 makes specific provisions for the use of hearing aid specialists “where timely referral to private audiologists and 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.”

In summary, AVAA opposes H.R. 3508 for the following reasons:

1. VA Audiologists occupy critical roles as members of interdisciplinary health care teams specifically designed and equipped to meet the unique needs of their Veteran patients. These patients often present with very complex conditions resulting from the synergistic effects of auditory and vestibular disorders occurring with co-morbidities such as traumatic brain injury, poly-pharmacy and post-traumatic stress disorder. The diagnostic work performed by a VA audiologist becomes the foundation for rehabilitative care which may, or may not, include the use of hearing aids.
2. H.R. 3508 attempts to provide for hiring and contracting capabilities that already exist. No modification to Title 38, United States Code, is needed to have hearing aid specialists hired to work internally within VA in positions that are commensurate with their training and scope of practice. Additionally, no modification to Title 38, United States Code, is needed to allow for contracting appropriate services with these professionals when the situation calls for the establishment and use of such contracts.

The opinions of AVAA do not represent the views of the Department of Veterans Affairs. The AVAA is an employee organization that was established in 2001 to address the professional needs and concerns of audiologists within the Veterans Health Administration of the U.S. Department of Veterans Affairs (VA). The goal is to achieve and maintain the highest quality of patient care, training, and research by individual audiologists and the programs in which they are housed. It is also the purpose of the AVAA to promote Audiology within the VA and outside the VA at regional, state and national levels and to establish professional and working ties with other related governmental and/or professional groups.