

Re: H.R. 6612, improved hearing health care for Veterans

S. 785

Dear (decision maker)

As one of your constituents, I humbly ask that you consider opposing H.R. 6612/ Senate bill 785. This bill is touted to improve a Veteran's hearing healthcare services and access. The reality is it does neither. This bill represents yet another attempt by hearing instrument specialists to require the Department of Veteran's Affairs appoint at least one hearing instrument specialist at every VA medical Center.

The original attempt to do this was the Veterans Mobility and Safety Act of 2016 which granted the VA authority to appoint hearing instrument specialists. The passage of this bill rightfully included wording to restrict job duties of hearing aid dispensers to reflect their limited training and lack of required education. This amended language was a result of input from the American Academy of Audiology, the American Speech Language Hearing Association, and the Academy of Doctors of Audiology.

As I am sure you are aware, wait time metrics have improved in the VA. In fiscal year 2019, 71% of all new patients were seen within 30 days and 96% of established patients were seen in less than 30 days. Additionally, 19% of new patients and 39% of established patients had same-day appointments. Overall, new patient wait times averaged 23.4 days. These numbers highlight that the VA providing our nation's Veterans with timely audiology services.

Access has also been dramatically improved with the creation of new outpatient centers and training offered by the Council for Accreditation in Occupational Hearing Conservation to expand the available services provided by hearing health technicians employed at the VA. This program allows hearing health technicians, under the supervision of an Audiologist, to assist the audiologist as well as provide limited testing of certain populations to further reduce wait times.

Audiologists in the VA have also been a leader in delivery of services via telehealth. As of May 1, 2020, provisions of telecare allow VA audiologists to program most Veteran's hearing aids in the comfort of their own home. In addition to the 47,000 Veterans who were seen via the Mission Act there were 46,000 Veterans seen via telehealth in fiscal year 2019. The latter number is expected to grow dramatically in the next year.

The final and potentially most harmful aspect of this bill is allowing hearing instrument specialists to define their own scope of practice. This legislation calls for ONET surveys completed by hearing instrument specialists to define what services the hearing instrument specialist may provide. There is no fact checking resource available to determine the validity of the ONET questionnaire responses, meaning that hearing instrument specialists would be able to give themselves the authority to provide services for which they do not have the qualifications to complete. Allowing hearing instrument specialists to define their own allowable services would put Veteran's hearing healthcare in great jeopardy as they do not have the knowledge and understanding to complete many services; such as vital diagnostic tests. These specialized tests are vital to audiologists and other medical providers to ensure the accuracy of diagnosis and efficacy of treatments.

This bill would expand the scope of practice of a profession that requires no university education. It would not improve access for Veterans in rural areas. The bill also does nothing to address timeliness of care as it does not include provisions for the new space and equipment that would be required by hiring any hearing healthcare provider. Ultimately, this bill would hurt Veteran's by severely decreasing the quality of hearing healthcare they would receive. Our nations Veterans have sacrificed so much for their country and I would appreciate your effort to ensure that they continue to receive the highest standard of audiologic care provided by qualified Audiologist.

I would appreciate your consideration opposing this bill to protect the hearing healthcare of our nation's Veterans.

Thank you,