

ACDHH Position Paper

Issue: Unlicensed Providers of Hearing Healthcare Services in Arizona

Background:

This recommendation is presented by the Hard of Hearing Task Force to the ACDHH board in response to the issue of unlicensed individuals, under the supervision of a physician in the state of Arizona, providing services that are within the scope of practice of audiologists and hearing aid dispensers.

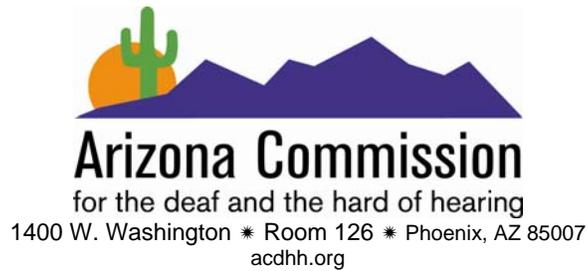
History:

The state of Arizona mandates licensing for all audiologists and hearing aid dispensers under A.R.S. Title 36, Chapter 17, Articles 2 and 3. The statute and its related rules specifically define the scope of practice of evaluation of hearing and fitting of hearing aids as follows:

18. "Practice of audiology" means:

- (a) Rendering or offering to render to a person or persons who have or who are suspected of having disorders of hearing any service in audiology including prevention, identification, evaluation, consultation, habilitation, rehabilitation, instruction and research.*
- (b) Participating in hearing conservation, hearing aid and assistive listening device evaluation and hearing aid prescription preparation, fitting, dispensing and orientation.*
- (c) Screening, identifying, assessing, nonmedical diagnosing, preventing and rehabilitating peripheral and central auditory system dysfunctions.*
- (d) Providing and interpreting behavioral and physiological measurements of auditory and vestibular functions.*
- (e) Selecting, fitting and dispensing assistive listening and alerting devices and other systems and providing training in their use.*
- (f) Providing aural rehabilitation and related counseling services to hearing impaired persons and their families.*
- (g) Screening speech-language and other factors that affect communication function in order to conduct an audiologic evaluation and an initial identification of persons with other communications disorders and making the appropriate referral.*
- (h) Planning, directing, conducting or supervising services.*

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19. "Practice of fitting and dispensing hearing aids" means the measurement of human hearing by means of an audiometer or by any other means, solely for the purpose of making selections or adaptations of hearing aids, and the fitting, sale and servicing of hearing aids, including assistive listening devices and the making of impressions for ear molds and includes identification, instruction, consultation, rehabilitation and hearing conservation as these relate only to hearing aids and related devices and, at the request of a physician or another licensed health care professional, the making of audiograms for the professional's use in consultation with the hearing impaired. The practice of fitting and dispensing hearing aids does not include formal auditory training programs, lip reading and speech conservation.

This statute was originally conceived and implemented in 1977 to protect consumers in the state of Arizona by insuring minimum standards of quality of care and accountability. A.R.S. Title 36, Chapter 17, Article 1, 36-1901 (A) (1) and (C) defines a board of professionals expert in the assessment of hearing and dispensing of hearing technology to which a consumer can appeal in the case of a complaint or grievance.

Physicians and individuals working under their supervision are regulated in Arizona by the Board of Medical Examiners, and as such are not required to abide by the provisions of the above mentioned statute and regulations. This situation has allowed for a small but alarming trend toward the use of unlicensed and often inadequately trained staff to provide hearing services in some medical offices, often without the consumer's awareness.

HOH Task Force Recommendation:

The Hard of Hearing Task Force recommends that ACDHH issue this Position Paper to Rohno Geppert, Program Manager, Office of Special Licensing, Division of Licensing Services, Arizona Department of Health Services, stating that all consumers in Arizona should receive hearing healthcare services only from individuals licensed to provide those services.

This position paper was unanimously adopted by the ACDHH Board of Commissioners as ACDHH's formal opinion on this issue at the Board of Commissioners bi-monthly meeting on Thursday, January 15, 2009.