

June 6, 2013

Leslie L. Knachel
Executive Director
Board of Audiology and Speech-Language Pathology
9960 Mayland Drive, Suite 300
Henrico, VA 23233-1463

Dear Ms. Knachel,

On behalf of the Virginia Society of Otolaryngology (VSO), I write to express concerns regarding the Board of Audiology and Speech-Language Pathology (BASLP) intention to submit legislation to Governor McDonnell to amend the statutory practice of audiology to include cerumen management.

Our first concern is that we believe it is not the role of the BASLP to suggest or expand scope of practice changes. We consider scope of practice changes to be a policy decision that should be determined by the Virginia General Assembly.

VSO cannot support this measure until we have clear evidence that the education and training of audiologists will allow them to perform cerumen management safely. I would like to draw your attention to the handout provided at the April 11th BASLP board meeting. The document titled, "Survey of Audiologists and Cerumen Management" from the American Journal of Audiology states "69% of the responding audiologists perform CM; 48% of the respondents who had completed residential Au.D. programs believed that their training programs inadequately prepared them to perform CM." It goes on to conclude that, "The respondents reported that they were inadequately trained in CM and believed that educational programs need to improve their coverage of CM."

This evidence we have reviewed to this point clearly shows that audiologists find inadequate education and training to be the reason why cerumen management has not been standard audiologist scope of practice. VSO has every intention to further research and work with the professional organizations involved to address the concerns we have listed above. Please do not hesitate to contact Ralston King at rking@whiteheadconsulting.net or (804) 310-2718 with questions, comments or concerns.

Warm Regards,

Andrew J. Heller, MD
President

CC: Jane Davis, VSO Executive Director
Ralston King, VSO Lobbyist
Cal Whitehead, VSO Lobbyist
Medical Society of Virginia

ⁱ Johnson, Carole E.; Danhauer, Jeffrey L.; Rice, Emma N.; Fisher, Sarah Kate. "Survey of Audiologists and Cerumen Management." *American Journal of Audiology*: Pages 1-2. 28 November 2012.