



BOARD OF HEARING AID DISPENSERS
Response to EIAC inquiry, May 13, 2014
Prepared by board executive officer, Ms. Linda Grief

- 1. Determine if a board that combines audiologists and speech pathologists with hearing aid dispensers would be financially viable in a way that limits the licensing costs of hearing aid dispensers but does not largely increase the licensing costs for audiologists and speech pathologists.**

In 2009, there was discussion between the Boards of Hearing Aid Dispensers (HAD) and Speech Language Pathologists and Audiologists (SLP) for possible legislation to combine the boards. However, the SLP board did not want to absorb the costs of processing hearing aid dispenser complaints. In 2011 SB 132 was enacted, excluding audiologists from licensure as a hearing aid dispenser. Thus more of an indication that SLP did not want to combine with HAD. The differences between the two are, audiologists specialize in the hearing aspect and hearing aid dispensers specialize in equipment and fitting hearing aids. Currently audiologists are allowed under their scope of practice to dispense hearing aids MAR 24.222.525.

Combining the boards would not largely increase the licensing costs for audiologists and speech language pathologists, as the total costs could be spread out among more licensees. There are currently 59 licensees with the HAD and 649 with SLP. The renewal fees for HAD is \$1500 while SLP is \$100. The only way to lower licensing costs for HAD is for SLP licensees to absorb some of their expenses, which historically they have declined.

If SLP were to absorb HAD, the legal expenses of HAD would increase the total expenses for SLP. HAD licensing, renewal and testing costs are a factor but quite small. In 2011 the board had 8 new apps and 72 renewals (included audiologists), in 2012 3 new apps and 51 renewals, and in 2013 3 new apps and 49 renewals. Legal expenses for board meetings and complaints were most of the costs.

	FY 11	FY 12	
SLP total expenses		\$46,789	\$64,127
HAD legal expenses		<u>\$15,844</u>	<u>\$31,166</u>
Total		\$62,642	\$95,923

Dividing total expenses by total licensees, the minimum licensing fee would go from \$88 to \$135 (\$62,642/708, \$95,923/708). Thus licensing fees would increase for SLP a minimum of \$35, and decrease for HAD by approximately \$1,365.

Some states combine their board of hearing aid dispensers and speech language pathology and audiology for licensure. Also available is a certification from the National Board for Certification in Hearing Instrument Sciences. However, a requirement for certification is a current state dispensing license.

2. Provide an analysis from the Board of HAD of what impact dissolution of the Board of HAD would have on the industry, particularly if statutes were to remain in place regarding licensing requirements and complaints were handled by the DOJ's Office of Consumer Protection.

The HAD board has been working on decreasing their costs for the last several years, thus much of the savings has been achieved. In 2012 they held 7 meetings, 2 were full board and 5 were adjudication or screening panels. If the screening and adjudication panel meetings were eliminated, the board could perform their licensing duties with two meetings per year, resulting in a savings of \$2,516. (FY12 board member costs = \$3,522 divided by # board meetings = 7, or \$503 per meeting. The cost savings for two meetings would be \$3,522-\$1,006 = \$2,516). There would be a savings on complaint processing, but other board costs would remain such as licensing, renewals and other program matters. In addition, if all of the complaints were handled by Consumer Protection, knowledge of the profession and expertise in the profession may not be available.

There would be some legal costs for the board even if all complaints went to DOJ. Some cost for board meetings and legal questions staff could not answer.

Specific industry knowledge would not be available without a hearing aid dispenser or audiologist being on staff at DLI or DOJ or at least available on a consulting basis.

3. Provide a financial analysis by the Department of the cost of licensing hearing aid dispensers within a program if the board were to be dissolved.

All board member expenditures would be eliminated from the expenses. Continuing with FY 12 for the example, the total expenditures were \$83,879 would be reduced \$3,522 totaling \$80,357.

Total HAD expenditures	\$83,878.56
Less board member travel, per diem and lodging	<u>\$ 3,522.02</u>
Total expenditures	\$80,356.54