

December 20, 2023

The Honorable Ron Wyden  
Chairman  
Committee on Finance  
United States Senate  
Washington, D.C. 20510

The Honorable Mike Crapo  
Ranking Member  
Committee on Finance  
United States Senate  
Washington, D.C. 20510

Dear Chairman Wyden and Ranking Member Crapo:

On July 19, the Medicare Audiology Access Improvement Act (S. 2377) was introduced and referred to your Committee for consideration. This legislation would inappropriately expand the scope of practice of audiologists and reclassify them as providers under Medicare but will not increase patient access. In short, the bill would put patients at risk by undermining physician-led team care. The undersigned groups **strongly urge you to protect patients and oppose S. 2377.**

We appreciate the Committee's ongoing work to protect patient safety and provide quality healthcare for Medicare beneficiaries. Bypassing a physician evaluation of hearing loss can lead to delayed or incorrect diagnoses resulting in failure to treat reversible causes of hearing loss or inappropriate treatment that could cause lasting harm and increased costs to patients.

While audiologists are valued health professionals who work for and with physicians, they do not possess the medical training necessary to perform the same duties as physicians, nor are they able to provide patients with the medical diagnosis and full spectrum of treatment options they require. Audiologists are not physicians and should not be treated as such under the Medicare program. Furthermore, studies [show](#) 95% of patients want a physician involved in their diagnosis and treatment. With eight years of formal education, a minimum five-year residency, and at least 15,000 hours of clinical training, otolaryngologist-head and neck surgeons are the most qualified providers to diagnose and treat ear, nose, and throat conditions—and are trained to lead a care team. A physician-led hearing healthcare team, with coordination of services, is the best approach for providing the highest quality care to patients.

Despite efforts to expand the scope of practice for nonphysicians to address workforce shortages, S. 2377 will not increase patient access, particularly in rural and underserved areas. It is clear that physicians and nonphysicians tend to practice in the same areas, and these findings are confirmed by [multiple studies](#), including state workforce studies.

Another concern that S. 2377 creates is undermining the effective treatment of hearing loss among Medicare beneficiaries. It remains to be seen what effect over-the-counter (OTC) hearing aids have on improving the uptake of devices by affected individuals since the U.S. Food and Drug Administration finalized its regulations in October 2022. While OTC hearing aids have the potential to increase patient access and address financial barriers, many patients do not understand the spectrum of available hearing technology or that OTC hearing aids are not customizable to their individual hearing loss. Consequently, physicians will need to continue educating patients about the different types of hearing loss and available treatments, and S. 2377 only creates patient safety concerns by undermining the physician-led team care model.

For the above-stated reasons, **we respectfully urge you to oppose any efforts to advance S. 2377.** Thank you for your consideration, and if you have any questions please contact the American Academy of Otolaryngology–Head and Neck Surgery at [governmentaffairs@entnet.org](mailto:governmentaffairs@entnet.org).

Sincerely,

### **National Organizations**

Administrator Support Community for ENT  
American Academy of Dermatology Association  
American Academy of Facial Plastic and Reconstructive Surgery  
American Academy of Orthopaedic Surgeons  
American Academy of Otolaryngic Allergy  
American Academy of Otolaryngology - Head and Neck Surgery  
American Association of Child and Adolescent Psychiatry  
American Association of Neurological Surgeons  
American College of Surgeons  
American Medical Association  
American Neurotology Society  
American Orthopaedic Foot & Ankle Society  
American Osteopathic Association  
American Osteopathic College of Otolaryngology - Head and Neck Surgery  
American Otological Society  
American Psychiatric Association  
American Rhinologic Society  
American Society of Anesthesiologists  
American Society of Pediatric Otolaryngology  
American Society of Retina Specialists  
Association of Academic Departments of Otolaryngology-Head & Neck Surgery  
Congress of Neurological Surgeons  
Harry Barnes Medical Society  
National Association of Spine Specialists  
Otolaryngology and Allergy Specialists – Integrated Solutions  
Society of University Otolaryngologists

### **State and Local Medical Associations**

Alaska State Medical Association  
Arizona Medical Association  
Arkansas Medical Society  
California Medical Association  
Connecticut State Medical Society  
Florida Medical Association  
Hawaii Medical Association  
Illinois State Medical Society  
Indiana State Medical Association  
Iowa Medical Society  
Kansas Medical Society  
Kentucky Medical Association  
Maine Medical Association  
Maryland State Medical Society  
Massachusetts Medical Society  
Medical Association of Alabama  
Medical Association of Georgia

Medical Society of the District of Columbia  
Medical Society of Delaware  
Medical Society of the State of New York  
Medical Society of Virginia  
Michigan State Medical Society  
Minnesota Medical Association  
Mississippi State Medical Association  
Missouri State Medical Association  
Montana Medical Association  
Nebraska Medical Association  
Nevada State Medical Association  
New Mexico Medical Society  
North Carolina Medical Society  
North Dakota Medical Association  
Ohio State Medical Association  
Pennsylvania Medical Society  
South Carolina Medical Association  
South Dakota State Medical Association  
Tennessee Medical Association  
Vermont Medical Society  
Washington State Medical Association  
Wisconsin Medical Society  
Wyoming Medical Society

**State and Local Specialty Societies**

Alabama Society of Otolaryngology, Head and Neck Surgery  
Arkansas Society of Otolaryngology – Head and Neck Surgery  
California Otolaryngology Society  
Connecticut Ear, Nose, and Throat Society  
Delaware Academy of Otolaryngology  
East Tennessee Otolaryngology Society  
Florida Society of Facial Plastic and Reconstructive Surgery  
Florida Society of Otolaryngology – Head & Neck Surgery  
Georgia Society of Otolaryngology / Head & Neck Surgery  
Greater Miami ENT Society  
Houston Society of Otolaryngology – Head & Neck Surgery  
Indiana Society of Otorhinolaryngology  
Iowa Academy of Otolaryngology  
Kansas Society of Otolaryngology – Head and Neck Surgery  
Long Island Society of Otolaryngology – Head and Neck Surgery  
Louisiana Academy of Otolaryngology – Head and Neck Surgery  
Maine Society of Otolaryngology  
Maryland Society of Otolaryngology  
Massachusetts Society of Otolaryngology – Head & Neck Surgery  
Memphis Society of Otolaryngology – Head and Neck Surgery  
Metro Atlanta Educational Society for Otolaryngology – Head & Neck Surgery  
Michigan Otolaryngological Society

Minnesota Academy of Otolaryngology  
Mississippi Society of Otolaryngology – Head and Neck Surgery  
Montana Society of Otolaryngologists - Head and Neck Surgery  
Nebraska Academy of Otolaryngology – Head and Neck Surgery  
New York Otologic Society  
New York State Society of Otolaryngology – Head & Neck Surgery  
North Carolina Society of Otolaryngology – Head and Neck Surgery  
Northwest Academy of Otolaryngology  
Orange County Society of Head and Neck Surgery  
Pennsylvania Academy of Otolaryngology – Head and Neck Surgery  
Puerto Rico Society of Otolaryngology Head and Neck Surgeons  
San Diego Academy of Otolaryngology  
San Francisco Bay Area ENT Society  
Santa Barbara Otolaryngology Society  
South Carolina Society of Otolaryngology – Head and Neck Surgery  
Texas Association of Otolaryngology  
The Colorado Ear, Nose, and Throat Society  
Tidewater Otolaryngology Society  
Utah Society of Otolaryngology  
Vermont Otolaryngology Society  
Virginia Society of Otolaryngology  
Wisconsin Society of Otolaryngology – Head & Neck Surgery