

June 4, 2018

SAMPLE LETTER

Re: U.S. Department of Labor National Guidelines for Apprenticeship Standards for Hearing Aid Specialists

Dear Chair and Members of the Licensing Board:

We are thrilled to announce that the United States Department of Labor (DOL) has re-certified the IHS National Guidelines for Apprenticeship Standards for Hearing Aid Specialists (herein referred to as “standards.”) Originally approved in 2015, the standards now reflect the course content of the new IHS Distance Learning Course, and are available for use by employers and state licensing authorities.

These standards define a nationally approved and recognized apprenticeship program that can be used by hearing aid specialist candidates to obtain a certificate of completion from their State Apprenticeship Agency (SAA) for successfully completing the program. We believe this program will have far-reaching effects in terms of recruitment, retention, standards of care, and reciprocity, and will help ensure that people with hearing loss have access to high-quality, competent hearing aid professionals for their hearing aid needs.

IHS reached out to all licensing authorities across the country in 2015 with information about the program, but we wanted to reach out with this letter to provide information about the program’s relaunch with pertinent information.

### **Program Development**

The International Hearing Society (IHS) worked closely with the DOL leading up to its adoption and certification of the guidelines in order to understand the nature of its national apprenticeship programs and determine the appropriateness of establishing national guideline standards for a hearing aid specialist apprenticeship program. The DOL embraced the opportunity, making ours a priority of the department. The extended period of review was necessary for both the DOL and IHS in order to establish an appropriate foundational education and training experience for candidates, and ensure national requirements are met. During the initial process in 2015, eight national employers and three state licensing agencies were invited by the DOL to provide comments on IHS’ proposed standards. All comments came back supportive of the standards. With the re-certification of the program this year, a second round of feedback was procured from a number of additional organizations and employers involved with the profession. The outcome is a strong program that will best prepare candidates to pass required state licensing examinations and upon licensure, provide safe and effective care for the hearing loss population.

The Standards outline a two-year competency-based program that incorporates both hands on learning through its “On the Job” (OTJ) training requirements, and self-study through its “Related Instruction” requirements. The OTJ learning is based on the IHS Trainer Manual, which is the best tool for applied learning and compliments the IHS Distance Learning Course, which is included in the Related Instruction component of the program. Related Instruction also includes education related to Federal Trade Commission and Food and Drug Administration rules, as well as state laws and regulations pertaining to hearing aid dispensing. Accounting for the fact that variations in the learning speed and motivations for each candidate will exist, the program being “competency-based” will allow for candidates to complete the program in less than two years – once their supervisor deems them to have met the program requirements.

Now that the Standards are final, the implementation is left up to the states. As stated in the Standards, “State Apprenticeship Agencies recognized by the Office of Apprenticeship to register local programs, and/or local laws and regulations, may impose additional requirements that must be addressed in the local apprenticeship standards. Local Standards of Apprenticeship must be developed and registered by each sponsor that undertakes to carry out an apprenticeship-training program. The local Standards of Apprenticeship will be the sponsor’s written plan outlining all terms and conditions for the recruitment, selection, employment, training, and supervision of apprentices as subscribed by the sponsor, and must meet all the requirements of the Registration Agency.”

On May 24, 2018, the U.S. DOL released the standards to the State Apprenticeship Agencies (attached). We recommend your licensing agency connect with your SAA to discuss the existing requirements for entry to the field and explore the potential of integrating the SAA’s program into your state licensing process as an option for satisfying any existing apprenticeship program/period requirement. It is important to note that IHS does not recommend making this the sole path by requiring all apprentices to utilize the program as a condition of licensure as doing so could create an unwarranted barrier to entering the profession.

A description of the work performed by a hearing aid specialist included in the Standards provides a potential apprentice the opportunity to understand the services that can be provided by hearing aid specialists. The description does not, nor was it ever intended to, set new ground in defining the scope of practice of a hearing aid specialist. All of the tasks listed were drawn from licensure laws for hearing aid specialists from across the country. Neither the Bureau of Labor Statistics, nor the U.S. Department of Labor define a profession’s scope of practice. As you know, this is defined by each individual state and is why the Description included in the Work Process Schedule begins with, “In a manner consistent with state law...” This descriptive paragraph does not have any impact on the state licensing laws that define scope of practice, and can be modified by the SAA to reflect permissible tasks as defined by state law. The Related Instruction Outline, which supports the Work Process Schedule details, in part, includes an intensive educational focus on State Licensing Laws and Regulations. This inclusion emphasizes the importance of an apprentice understanding what is permitted and what is not permitted practice in their state.

Once a candidate has successfully completed the program and obtained their certificate of completion, the State Apprenticeship Agency and supervisor then deem them ready to take their licensing examinations. The licensing examinations would continue to be overseen and directed

by the state licensing agency as they are currently, and are distinct from the apprenticeship program.

### **Timeliness of the Program**

Based on a report in the Journal of the American Academy of Audiology (Freeman and Windmill, Demand for Audiology Services: 30-Yr Projections and Impact on Academic Programs, 2013), we estimate a hearing loss population of 53 million people by 2050, and a projected need of 22,000 hearing aid specialists by the year 2021 - meaning the hearing aid specialist profession is in demand. Recognizing this inherent need, IHS sought out innovative ways to attract qualified and motivated candidates to the profession. The DOL's Leader for Apprenticeship program is an excellent vehicle to facilitate the entrance of qualified individuals into the entry level of the hearing aid specialist profession. Further, State Apprenticeship Agencies offer potential employers the opportunity to connect with thousands of candidates who are looking for full-time, meaningful employment.

### **Benefits of Using the Program**

There are numerous benefits for state licensing agencies that integrate the new apprenticeship path into their licensing process, including:

- Standardized training across the country for the Hearing Aid Specialist profession
- Exposes untapped talent pool to hearing aid dispensing profession
- Method for assisting with obtaining reciprocity
- State Apprenticeship Agency vets candidates and supervisors, maintains relationship
- Will produce strong candidates for licensure
- Improved quality of patient care
- More diverse workforce
- Associated with a nationally-recognized system of training throughout the United States
- Supports state-based hiring programs

Even though employers are not required to use the program, they will be incentivized to use it as an option. Some of the benefits for both employers and apprentices include:

- Teaching employees new skills increases productivity, decreases turnover along with absenteeism and saves employers money spent on training
- Enhances retention. Investing in the future of employees through this program can strengthen employee loyalty to employers
- Enhances problem-solving ability and versatility of employees
- Possible tax and other business incentives for hiring Veterans or candidates from state hiring programs like vocational rehabilitation

Any employer can work with the SAA to usher their trainee through the program. Even though the certificate of completion may not be formally recognized by the state licensing agency at this time, the employer and trainee will know that the trainee has completed a comprehensive program that will best prepare them for their state licensing examinations, and that his/her certificate of completion may be a useful reciprocity tool in the future.

## What's Next

Going forward, IHS seeks to partner with you and your SAA to help establish the apprenticeship program in your state in a way that will maintain meaningful licensing standards while integrating the nuances of your state's licensure requirements into the SAA's hearing aid specialist apprenticeship program, such as existing restrictions on the number of apprentices per sponsor. This will allow the state to bring a consistent program to fruition so that qualified candidates can pursue a career as a hearing aid specialist. We recognize there may be a need to update licensing laws or rules to formally integrate the program into the licensing process, and stand prepared to assist. IHS' Government Affairs team can be reached at [advocacy@ihsinfo.org](mailto:advocacy@ihsinfo.org) at or 734.522.7200. Understanding that the opening of licensing laws must be appropriately timed since doing so can place existing policy at risk, we expect the adoption of this program by state licensing agencies will take time, and IHS is committed to working with you through the process. In the meantime, apprentices in most states should be able to participate in the registered apprenticeship in parallel with the state's current training requirements thanks to the unified training material. Sponsors and apprentices must, however, be mindful to complete the requirements of both programs. This will allow apprentices and their employers to benefit from the financial and other benefits of the apprenticeship program now without having to wait for the formal recognition in state law of the program as a path to licensure.

We look forward to partnering with you on this exciting opportunity, and invite you to contact us with questions or to determine next steps.

Thank you for the important work you do to ensure consumers receive the best possible care and hearing aid dispensing professionals are competent to perform the work at hand and are held to high ethical standards.

Sincerely,



Kathleen Mennillo, MBA  
Executive Director