



Hearing Doctors

OF KANSAS ◦ AUDIOLOGISTS

Doctors of Audiology (Au.D.)

Dr. Kevin P. Ruggle
Dr. Charles L. Gillum, Jr.

Testimony presented by Kevin Ruggle, Au.D. to the Special Committee on Organization of Public Health Boards, December 14, 2016

December 14, 2016

Dear Chairman Hawkins and Members of the Committee,

I am Dr. Kevin Ruggle, a practicing audiologist in Kansas since 1991. I own a private practice in Manhattan, Ks. I have held a KS hearing aid dispensing license through the Board of Examiners in fitting and dispensing hearing instruments since 1991 and an audiology license since 1993, when it was established. This means I have held two licenses in Kansas to practice my profession for the last 23 years. This places me in a unique situation to evaluate these boards side by side.

Kansas Department for Aging and Disability Services (KDADS) is the logical agency to license and regulate hearing aid dispensing. KDADS has licensed all audiologists since 2012 and about half of the licensees under the Board of Examiners are audiologists who are also licensed under KDADS. In my opinion, they are a logical agency to move the Board of Examiners to. They are efficient and can offer the Board of Examiners the state oversight by being located in Topeka instead of Garnett, KS. They can offer services the Board of Examiners do not offer and at a lower cost.

I am proposing that the Board of Hearing Aid Examiners be moved to KDADS.

Consumer and Professional Access:

KDADS has a website that both consumers and professionals can access, including searching for disciplinary action of audiology licensees, length of time licensed, online application form, statutes and online license renewal. The Board of Examiners does not even have a website. If consumers are searching for consumer protection related to hearing aid dispensing, it is not available to them on the internet. KDADS already accepts and deals with both consumer and professional complaints efficiently.

Cost:

KDADS licenses audiologists on a two year renewal plan at a license cost of \$135 every two years. The Board of Examiners requires licensing every year at \$100 per year and the Board is proposing a 25% increase in annual fees to all licensees in 2017. With the proposal increase KDADS is almost half the cost of the Board of Examiners. It seems logical to have KDADS manage the Board of Examiners to keep the costs down and take advantage of the expertise and tools already available through KDADS.



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Duplication of Services:

KDADS has a professionally staffed office that is responsive and accessible to both the consumer and the licensed professional. They have already created a working website that audiologists in Kansas appreciate. As I mentioned before, audiology and hearing aid dispensing are closely related. Even if the Board of Examiners were to begin to create a website today, they would lack the technical skills, infrastructure, and funding to compete with what is already being offered at KDADS at nearly half the cost. As mentioned in testimony last week the Board of Examiners has "one part-time executive officer." A move to KDADS would mean an improvement for consumers and dispensers almost immediately!

Philosophy:

Last week's testimony quoted the Board of Examiners philosophy: "The Board of Hearing Aid Examiners will act in accordance with a standard of conduct that will ensure efficient, productive, ethical and accountable actions. It is our obligation to approach this responsibility in a fair and logical manner."

I say the best way to "ensure efficient, productive, ethical, and accountable actions" is to act "fairly and logically" and move this board to KDADS.

Thank you,

Kevin P Ruggle, Au.D.

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All Regulations

Board of Examiners in Fitting and Dispensing Hearing Instruments K.A.R. 67-2-4 and 67-5-5

Category:

Active Regulations

Date Added: 10/26/2016

Public Hearing Date and Time: 3:30 p.m. Thursday, January 5, 2017

Public Hearing Location: 909 N. Pearl, Paola, KS

K.A.R. 67-2-4 Examinations. This regulation explains the scoring for the written and practical examinations as well as the application process for the written and practical examinations.

The economic impact to the agency will be insignificant. The loss of revenue from the written exam will be offset by the increase in practical examination fees (K.A.R. 67-5-5).

K.A.R. 67-5-5 Fees. This regulation combines all board fees and through revisions to fees and implementation of new fees, will generate an increase in the board's operating income in order to maintain adequate funds for operation.

The proposed regulation is not mandated by federal law.

There will be no cost to the agency proposing the regulation. The agency will see an increase in licensure funds necessary to maintain a fiscally sound budgetary level.

There should be no economic impact to other governmental agencies or units or to the general public or consumers of hearing instruments or hearing instrument services.

All examinees will see an increase of \$10 to each practical examination.

All licensees will see an increase of \$25 in the annual renewal fee. Fees will remain lower than surrounding states.

All examinees will see an increase in cost of the written examination administered by the international hearing society, subject to approval by the board.

Economic Impact Statement

K.A.R. 67-2-4, 67-5-5

Pursuant to requirements of K.S.A. 77-416 (b), the Kansas Board of Examiners in Fitting and Dispensing of Hearing Instruments submits the following description of the economic impact of the above referenced regulation.

(1) K.A.R. 67-2-4 explains the application and scoring process for written and practical examinations. The written examination shall be graded by the international hearing society, subject to approval by the board. K.A.R. 67-5-5 increases practical examination and annual renewal fees.

(2) (A) The proposed regulations are not mandated by federal law.

(B) N/A

(3) (A) There will be an increase in cost of the written examination to the examinees. Written examination will be administered and graded by the international hearing society subject to board approval. Practical examination fees will increase by \$10 per practical exam to offset the loss of revenue from the written exam previously administered by the board. The state agency proposing the regulation will see an increase in revenue due to an increase in renewal fees of \$25. Licensees will see an increase in annual renewal fees of \$25. This is similar to or less than surrounding states. It is not anticipated that any governmental agency or unit, private citizen or consumer of hearing instruments or hearing instrument services will be affected by the regulation.

(4) No other methods were considered by the Board of Hearing Aid Examiners for achieving the stated purpose of the rule and regulation.

Board of Examiners in Fitting and Dispensing Hearing Instruments K.A.R. 67-2-4 and 67-5-5

Any individual with a disability may request the regulations and supporting documents in an accessible format. Requests for accommodations should be made at least five working days in advance of the CRRB meeting by contacting (785) 271-3200 or crrb@ks.gov.

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