

February 13, 2017

Dear Chairman Hawkins and Committee Members:

I am Kevin Ruggle, from Manhattan, KS and I am a Doctor of Audiology as well as a dispensing Audiologist. This means I hold two separate licenses to practice in Kansas where I have practiced for 25 years. My Audiology license is through KDADS and my dispensing license is through the Kansas Board of Examiners in the Fitting and Dispensing of Hearing Aids. Having held both licenses for many years, I believe I am in a unique position to compare these boards and offer my support of HB 2195.

Duplication of Services:

Audiology and Hearing Aid dispensing are overlapping professions. Approximately half of the licensees under the Board of Examiners are Audiologists like myself who are also licensed under KDADS. It simply makes sense to place similar professions under the same state agency. For example: KDADS manages the similar professions of CNA, CMA and HHA. This bill also allows for state supervision of the Board of Examiners and moves the board from Garnett, KS to Topeka, KS.

Consumer Protection:

Kansas consumers are currently protected under KDADS where they can search online to see if an Audiologist holds a license, for how long, and if any disciplinary action has taken place. Consumers are able call or email with complaints or questions. We (as licensees) can download statutes, application forms, and renew our licenses online. The Board of Examiners does not have a website, making it very difficult for consumers to contact the board with questions or complaints. A move to KDADS would solve this problem on the first day the bill is enacted. It would be very difficult for the Board of Examiners to create and maintain a website like KDADS with their staff consisting of one part time executive officer. It simply makes sense to use the existing website and full staff of KDADS to better serve the consumers and the licensees.

Cost to Licensees:

Licensees pay more, but receive fewer services through the Board of Examiners than KDADS. A two year license under KDADS is \$135 while it is \$200 with the Board of Examiners. In addition, the Board of Examiners recently proposed a 25% increase in fees which would make it \$250, nearly double the cost but providing less services to licensees compared to KDADS.



Hearing Doctors

OF KANSAS ◦ AUDIOLOGISTS

Doctors of Audiology (Au.D.)

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

Compliance

Moving the Board of Examiners to KDADS would place that board in complete compliance with the supreme court ruling in N.C. State Board of Dental Examiners v. FTC(2015) by utilizing their current board in an advisory role under a state agency, exactly what is already working well for Audiologists and Speech Pathologists under KDADS. This allows State immunity to be declared in conflicts regarding anti-trust decisions. This is why you will begin to see other boards being moved and administered in a similar fashion in the coming years. I would be happy to answer questions about the Supreme Court ruling if you need more information.

Harm to Licensees:

The passage of this bill will have no negative effects for the licensees under the Board of Examiners. We will find better services immediately and it is even possible that the licensing fees will drop in the future as this is written into the new bill. The current board members remain intact, and they will serve the secretary of KDADS in an advisory role. This system already has proven effective and cost efficient for Speech Pathologists and Audiologists. The hearing instrument specialists are likely to be concerned about these changes as they have no experience in working with KDADS and I understand that fear. I would like to tell everyone that there is no reason for concern in moving this board to KDADS. If moving the board was in some way damaging to our ability to practice hearing aid dispensing, why would I as a licensee be advocating it?

Summary:

A YES vote on this bill brings better consumer protection to Kansas, places overlapping professions under the same umbrella agency and makes the board Supreme Court complaint while utilizing current state resources more efficiently. These are strong reasons to pass this bill and I ask for your support. Thank you for considering this bill.

Kevin P. Ruggle, Au.D.
Doctor of Audiology