



February 18, 2025

The Honorable Cynthia Roe, Chair  
Committee on Public Health  
State Capitol  
2300 N Lincoln Blvd  
Oklahoma City, OK 73105

Re: HB 2188

Dear Chair Roe and Members of the Committee:

On behalf of our Oklahoma-based members and the children they serve in local schools, we, the undersigned audiology and hearing care organizations, write again to express concerns with HB 2188. We unequivocally support the expansion of hearing screenings in Oklahoma and endorse the detection of hearing loss in early childhood and school-aged populations using evidence-based hearing screening methods. However, we have too many outstanding questions about HB 2188 to feel confident that the legislation would achieve this goal, and it could have significant, unintended negative consequences.

First and foremost, HB 2188 extends beyond being solely a hearing screening mandate. The amended proposal includes language specific to hearing screenings (i.e., hearing sensitivity or minimum “threshold” based screening) and hearing assessments, the latter being achieved via speech-in-noise testing with a tablet-based program and associated software. The scope of this bill is more a *mandated hearing assessment program* to be completed in the Oklahoma public school system that is not consistent with the evidence-based methods recognized for childhood hearing screenings by nationally recognized clinical practice guidelines.

We do have other significant, unaddressed concerns about the burdens of the legislation. Specifically, the bill does not address the financial and other resource burden to the Oklahoma education system. Additionally, it does not take into consideration the immediate workforce supply challenges to accommodate speech-in-noise testing and referrals.

We strongly urge the Committee to defer the legislation to provide the opportunity for additional considerations. We request broad Oklahoma stakeholder engagement in revising the bill to achieve a successful hearing screening mandate. We recommend that you instruct agencies of jurisdiction to study the cost implications before finalizing the legislation. We also think it would be useful to look at sample legislation in the other states across the nation that have implemented hearing screening mandates.

Thank you for your further consideration of our concerns and our intent that Oklahoma has an effective hearing screening mandate.

Sincerely,

American Academy of Audiology (AAA)

Academy of Doctors of Audiology (ADA)

American Speech-Language-Hearing Association (ASHA)

Hearts for Hearing

Oklahoma Speech-Language-Hearing Association (OSHA)

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<sup>i</sup> American Speech-language-hearing Association. (Oct. 2024). *School Hearing Screening: State Laws and Guidelines*. <https://www.asha.org/siteassets/advocacy/state-hearing-screening-requirements.pdf>