



May 20, 2026

Thomas J. Engels
Administrator
Health Resources and Services Administration
5600 Fishers Lane
Rockville, MD 20857

Dear Administrator Engels:

The American Speech-Language-Hearing Association (ASHA) writes to request that the field of audiology, specifically pediatric audiology, be recognized as an eligible profession under the Pediatric Specialty Loan Repayment Program (PSLRP) administered by the Health Resources and Services Administration's (HRSA) Bureau of Health Workforce. We believe this inclusion is warranted and would advance HRSA's mission of improving access to pediatric specialty care in Health Professional Shortage Areas, Medically Underserved Areas, and among Medically Underserved Populations.

ASHA is the national professional, scientific, and credentialing association for 247,000 members, certificate holders, and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students. Audiologists are expertly trained doctoral-level health care professionals who diagnose and treat hearing and balance conditions in a wide variety of settings, including early intervention.

Critical Role of Pediatric Audiology and Return on Investment

Early Detection Improves Lifelong Outcomes and Reduces Public Costs

Pediatric audiologists are clinical health care professionals who hold an AuD (Doctor of Audiology). They have highly specialized training in infant and toddler audiologic and vestibular assessment that most other providers do not receive. Their expertise includes advanced diagnostic procedures such as auditory brainstem response (ABR), otoacoustic emissions (OAE), behavioral audiometry, and specialized vestibular (balance) assessments designed specifically for infants and young children.

These skills allow pediatric audiologists to accurately diagnose hearing and balance disorders even before a child can speak or reliably respond. This is critical because untreated hearing loss can delay speech and language development, and untreated vestibular dysfunction can delay crawling, walking, coordination, and overall physical independence. According to the Centers for Disease Control and Prevention (CDC), clinicians screen more than 98% of U.S. newborns for hearing loss and identify over 6,000 infants with permanent hearing loss every year.¹ Early intervention before six months of age significantly improves speech, language, social, and developmental outcomes.

The CDC estimates that the lifetime educational cost of untreated permanent childhood hearing loss exceeds \$115,000 per child, while early detection substantially reduces special education, health care, and social service expenditures.²

Provide Specialized Interventions That Improve Long-Term Outcomes

Pediatric audiologists are uniquely qualified to select, program, and manage hearing aids, cochlear implants, bone conduction devices, remote microphones and hearing assistive technology systems, and other hearing technologies for children during critical developmental stages. Their doctoral-level training also equips them to interpret complex electrophysiologic tests such as ABR and vestibular evaluations, ensuring children receive precise and individualized treatment plans. By optimizing hearing and balance function early, pediatric audiologists help children develop communication, motor skills, and learning readiness that directly impact their success in school and long-term independence.

Children who receive timely hearing health care are more likely to participate in mainstream education, achieve stronger academic outcomes, and become employed adults. CDC data indicate that approximately 71% of young adults with childhood hearing loss and no additional disabilities are employed, demonstrating the profound societal and economic benefits of early pediatric audiology intervention.

Provide Family-Centered Care That Improves Lifelong Outcomes

Beyond diagnosis and treatment, pediatric audiologists serve as essential long-term partners for families navigating hearing loss, vestibular challenges, and communication milestones. Their advanced clinical training allows them to guide parents through communication options, therapy and management, school accommodations, and life transitions.

This support can significantly improve a child's long-term developmental and educational outcomes. Early pediatric audiology care not only improves language outcomes, developmental milestone achievement, and quality of life, but also reduces future dependence on government-funded education and health care systems. By helping children achieve greater independence, academic success, and social engagement, pediatric audiologists create measurable long-term benefits for families, communities, and society as a whole.

Audiology's Programmatic Alignment for Inclusion

While the PSLRP statute identifies "pediatric medical subspecialists," "pediatric surgical specialists," and "child and adolescent behavioral health care providers," it does not prohibit the inclusion of the field of audiology in the statutory language.³ Audiology aligns with the core purpose of this program and HRSA has the discretion to specifically enumerate pediatric audiology to ensure audiologists qualify for this program while serving in Health Professional Shortage Areas, Medically Underserved Areas, or among Medically Underserved Populations.

Pediatric audiologists provide direct patient care services—including diagnosis, medical device management, and clinical coordination—that are integral to pediatric health care. Their work addresses outcomes directly related to the PSLRP's stated mission of improving patient outcomes, fostering the regionalization of the pediatric health workforce, and ensuring children receive access to essential specialty care. In communities where pediatric audiologists are absent or inaccessible, hearing loss often goes undetected and untreated,

with cascading consequences for educational achievement, language development, mental health, and lifelong well-being.

The existing PSLRP-eligible disciplines include nonphysician behavioral health professionals such as licensed clinical social workers, licensed professional counselors, marriage and family therapists, and substance use disorder counselors. By recognizing these professions, the program acknowledges that nonphysician allied health clinicians play a critical role in delivering pediatric specialty care. Pediatric audiologists similarly provide highly specialized clinical services that are essential to children's long-term health and developmental outcomes.

Including pediatric audiologists in the PSLRP would meaningfully expand access to essential pediatric specialty care in underserved communities while supporting improved long-term development and educational outcomes for children. We are committed to working collaboratively with HRSA to advance this important inclusion and stand ready to provide any additional evidence, data, or testimony that may be helpful.

Thank you for your consideration of this request. If you or your staff have any questions, please contact Bill Knudsen, ASHA's director of education policy, at bknudsen@asha.org.

Sincerely,



Linda I. Rosa-Lugo, EdD, CCC-SLP
2026 ASHA President

¹ Centers for Disease Control and Prevention. (2025). *Data and Statistics About Hearing Loss in Children*. <https://www.cdc.gov/hearing-loss-children/data/>

² Ibid

³ Cornell Law School. (n.d.). *42 U.S. Code § 295f - Investment in tomorrow's pediatric health care workforce*. <https://www.law.cornell.edu/uscode/text/42/295f>