

May 18, 2023

Katherine Ceroalo  
DOH, Bureau of Program Counsel  
Reg. Affairs Unit, Room 2438  
ESP Tower Building  
Albany, NY 12237

RE: Newborn Hearing Screening Regulations

Dear Ms. Ceroalo:

On behalf of the American Speech-Language-Hearing Association, I write to concerns and provided a recommendation for the proposal to amend New York's Newborn Hearing Screening regulations.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 228,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Audiologists specialize in preventing and assessing hearing and balance disorders as well as providing audiologic treatment, including hearing aids. Speech-language pathologists (SLPs) identify, assess, and treat speech, language, swallowing, and cognitive-communication disorders. Over 19,300 ASHA members reside in New York.<sup>1</sup>

ASHA has concerns regarding Section 69-8.2 (b)(1) with the addition of two-tier infant screening prior to the discharge from neonatal care. The Joint Committee on Infant Hearing recommends that "the sole use of [automated]ABR for hearing screening is recommended for infants who have received care in the NICU. In addition, infants cared for in the NICU who do not pass the ABR should be (a) referred directly to an audiologist for rescreening, and (b) if indicated, given a comprehensive audiological evaluation including diagnostic ABR."<sup>2</sup> ASHA recommends that this distinction be included in the regulation.

Thank you for your consideration of ASHA's comments. If you or your staff have any questions, please contact Susan Adams, ASHA's director of state legislative and regulatory affairs, at [sadams@asha.org](mailto:sadams@asha.org).

Sincerely,



Robert M. Augustine, PhD, CCC-SLP  
2023 ASHA President

---

<sup>1</sup> American Speech-Language-Hearing Association. (2023). *New York* [Quick Facts]. <https://www.asha.org/siteassets/advocacy/state-fliers/new-york-state-flyer.pdf>.

<sup>2</sup> The Joint Committee on Infant Hearing. (2019). Year 2019 Position Statement: Principles and Guidelines for Early Hearing Detection and Intervention Programs. *The Journal of Early Hearing Detection and Intervention*. <https://www.infanthearing.org/nhstc/docs/Year%202019%20JCIH%20Position%20Statement.pdf>.