



July 24, 2026

Ms. Pamela Coughlin
Executive Director
West Virginia Board of Examiners for Speech-Language Pathology and Audiology
99 Edmiston Way
Ste 214
Box 11
Buckhannon, WV 26201

RE: Audiology Assistant Regulations

Dear Director Coughlin:

On behalf of the American Speech-Language-Hearing Association (ASHA), we submit the following comments regarding the proposed changes to the audiology assistant regulations under §29-2.

ASHA is the national professional, scientific, and credentialing association for 247,000 members, certificate holders, and affiliates who are audiologists; speech-language pathologists (SLPs); speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students. Over 1,100 ASHA members reside in West Virginia.¹

ASHA opposes the proposed removal of §29-2-7 and §29-2-8 governing audiology assistants. We are concerned that the rationale provided for eliminating these provisions is not supported by available evidence. Contrary to the Notice of Public Comment, neighboring states—including Pennsylvania, Ohio, and Maryland—maintain regulatory pathways for audiology assistants. These states recognize the value of appropriately trained assistants working under the supervision of licensed audiologists to improve service efficiency while maintaining patient safety.

Audiology assistants enable licensed audiologists to delegate appropriate technical and support tasks, increasing access to care and allowing audiologists to focus on more complex clinical services. Eliminating these provisions would remove a workforce option that imposes minimal regulatory burden while reducing flexibility to address future service delivery needs. According to projections from the U.S. Bureau of Labor Statistics, demand for audiologists in West Virginia is expected to grow by 11.1% between 2022 and 2032.² Maintaining a regulatory pathway for audiology assistants can help address workforce shortages, expand access to services, and better meet the needs of West Virginians with communication and hearing disorders.

ASHA respectfully recommends that the Board retain §29-2-7 and §29-2-8. If revisions to these provisions are warranted, we welcome the opportunity to provide feedback informed by input from the West Virginia Speech-Language-Hearing Association (WVSHA) and practicing audiologists in the state. Revising the regulations, rather than eliminating them entirely, would preserve an important workforce resource while allowing the Board to address any identified concerns.

Thank you for considering ASHA's comments regarding the audiology assistant regulations. If you or your staff have any questions, please contact:

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American Speech-Language-Hearing Association
ecrowe@asha.org.

Submitted on behalf of the American Speech-Language-Hearing Association

¹ American Speech-Language-Hearing Association. (2026). *West Virginia* [Quick Facts].
<https://www.asha.org/siteassets/advocacy/state-flyers/west-virginia-state-flyer.pdf>

² Ibid