



January 12, 2026

The Honorable Shae Sortwell, Chair  
The Honorable Chuck Wichgers, Vice-Chair  
Regulatory Licensing Reform Committee  
PO Box 8952  
Madison, WI 53708

RE: ASHA Comments on AB 820

Dear Chair Sortwell, Vice-Chair Wichgers, and Members of the Committee:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to comment on AB 820, which proposes updates to the scope of practice for audiologists in Wisconsin, including provisions related to device management, diagnostic authority, and clinical services that will improve access to skilled audiology care across the state.

ASHA is the national professional, scientific, and credentialing association for 241,000 members, certificate holders, and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students. Nearly half of ASHA's members are employed in schools. Over 4,000 ASHA members reside in Wisconsin, including more than 300 audiologists.<sup>1</sup>

ASHA's comments below address specific scope of practice updates in AB 820 that reflect audiology education, training, and clinical practice.

AB 820 appropriately recognizes that working with osseointegrated devices, performing cochlear implant fittings, and conducting screenings of mental health and cognitive impairment are firmly established within the practice of audiology. We appreciate that this legislation also recognizes that audiologists possess the education, preparation, and skills to perform cerumen management and the removal of foreign bodies from the ear canal.

ASHA further affirms that AB 820's provisions allowing audiologists to order cultures, bloodwork, and radiologic imaging reflect modern components of audiology practice when used to diagnose, manage, and treat auditory or vestibular conditions. We recognize that the Department of Safety and Professional Services will need to promulgate regulations to implement these provisions of AB 820, as authorized under Wis. Stat. § 227.11. ASHA supports such regulatory oversight and will work collaboratively with audiologists in Wisconsin to ensure the Department provides appropriate guidance regarding the use of cultures, laboratory testing, and imaging within audiology practice.

ASHA acknowledges that under Sec. 5 (§459.20), AB 820 proposes additional audiology scope of practice updates to include in-office nonradiographic imaging of the external auditory canal; the prescribing of topical medications for conditions of the external ear; and the ordering of genetic testing related to auditory or vestibular conditions. ASHA is currently consulting with Wisconsin audiologists and national clinical experts to evaluate these aspects of practice. We encourage the committee to closely examine these provisions to ensure they are implemented as intended and exercised only by audiologists with appropriate training and demonstrated competency in these specialized areas of care.

Thank you for your continued support of audiologists and the audiology profession. We appreciate your consideration of ASHA's perspective on AB 820. If you or your staff have questions, please contact Tim Boyd, ASHA's director of state health care and audiology affairs, at [tboyd@asha.org](mailto:tboyd@asha.org).

Sincerely,

A handwritten signature in cursive script that reads "Linda I. Rosa-Lugo".

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

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<sup>1</sup> American Speech-Language-Hearing Association. (2025). *Wisconsin* [Quick Facts].  
<https://www.asha.org/siteassets/advocacy/state-flyers/wisconsin-state-flyer.pdf>