February 19, 2013

The Honorable John R. Gordner
177 Main Capitol
Harrisburg, PA 17120

Dear Chairman Gordner,

On behalf of the Pennsylvania Neurological Society--dedicated to the furthering the neurological well-being of the citizens of Pennsylvania--and the American Academy of Neurology (AAN), a national association representing more than 25,000 neurologists and neuroscience professionals worldwide, we are writing to share our concerns with Senate Bill 137, known as the Speech-Language and Hearing Licensure Act.

Specifically, we are concerned about language on page 5, lines 16-21, which would allow audiologists to perform intraoperative monitoring of the central nervous system, spinal cord and cranial nerve function. Intraoperative monitoring (IOM) involves a broad skill set that requires post-doctoral level knowledge of anatomy, physiology, and pathology. The knowledge and training for proficiency in IOM is about 5-8 years more advanced than the training of a master’s or doctorate level audiologist.

The practice of audiology does not include most techniques in the operating room, including EEG brain wave monitoring, EMG cranial nerve monitoring of the face, eye, and tongue, as well as arm and leg nerves and muscles. Audiology training also does not include the development of a knowledge base about major diseases, including cerebral aneurysms, cerebral tumor resections, epilepsy surgery, and scoliosis correction.

When performed insufficiently trained, IOM puts the patients at risk for paraplegia and other medical complications. False interpretation of brainwaves and muscle signals can fail to alert the surgeon to danger, or point the surgeon in the wrong direction during brain or spinal cord surgery. As a result a patient can suffer permanent disabilities.

Therefore, it is our position that IOM techniques should be restricted to persons who have sufficient skills, knowledge, and abilities, based upon years of formal education, supervised training and experience. We ask that you consider amending Senate Bill 137 by, at minimum, requiring proper qualification of for performing IOM techniques, as well supervision by a properly trained physician.

Please do not hesitate to contact Tim Miller, AAN Sr. Program Manager of State Advocacy at (612) 928-6016 or at tmiller@aan.com for questions or comments.

Sincerely,

Bruce Sigsbee, MD, FAAN
President
American Academy of Neurology

Stephen Ross, MD
President
Pennsylvania Neurological Society