



May 13, 2025

Molly Dinardo
State Board of Health
Department of Health

Via email

Dear Ms. Dinardo,

On behalf of the Washington Speech-Language-Hearing Association (WSLHA), I am writing to express support for the Washington State Board of Health's proposed updates to Chapter 246-760 WAC – Auditory Screening Standards for School Districts. These rules would allow school districts to use otoacoustic emission (OAE) devices as an alternative screening tool for students who cannot participate in pure tone audiometry tests. WSLHA represents the interests of approximately 5000 speech-language pathologists, speech-language pathology assistants, and audiologists across our state.

OAE devices offer a highly effective, objective, and efficient means of identifying potential hearing issues in students—particularly in younger children or students who may have difficulty participating in traditional behavioral hearing screenings.

Allowing school districts to use OAE devices provides several key benefits. OAE testing reduces the risk of false positives and negatives by removing subjectivity from the screening process. This method is especially beneficial for children with developmental delays, non-verbal students, or those who are non-English-speaking. Finally, the screenings are quick and can be administered by trained personnel, allowing schools to screen more students in less time.

By updating regulations to permit the use of OAE devices, school districts will be better equipped to meet the diverse needs of their students and ensure early intervention for those with hearing challenges. Early detection is crucial for a child's speech, language, and educational development.

Thank you for the opportunity to support these rules that will allow school districts to use evidence-based tools to safeguard student health.

Sincerely,

Laurel White, SLP, Ed.D.
President