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**MEMORANDUM**

July 28, 2004

TO: SHERI ENOS, Ph.D.  
FROM: LINDSEY D. ALTON  
RE: SCOPE OF PRACTICE OF AUDIOLOGISTS IN PENNSYLVANIA

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The practice of an audiologists licensed in Pennsylvania is restricted to the "evaluation, counseling, habilitation and rehabilitation of individuals whose communication disorders center in whole or in part in the hearing function, including the prevention, identification, examination, diagnosis and treatment of conditions of the human auditory system, and including the examination for, and adapting and fitting of amplification or assistive devices." 45 Pa. Code § 45.2. Intraoperative monitoring involves collecting data from patients and interpreting that data for purposes of medical treatment or diagnosis and clearly does not fall within the scope of permitted practice of audiologists in Pennsylvania.

Medical doctors are permitted to delegate the performance of medical services to other health care practitioners as long as the delegation is not prohibited by statutes or regulations relating to other licensed health care practitioners. 63 P.S. § 422.17(a)(3). The delegation of medical practice to audiologists in Pennsylvania is prohibited by law. The Speech-Language and Hearing Licensure Act under which audiologists are licensed requires the State Board of Speech-Language and Hearing to adopt a code of ethics providing that "whereas speech-language pathologists, audiologists and teachers of the hearing impaired provide nonmedical and nonsurgical services, medical diagnosis and medical treatment by these persons are specifically to be considered to be unethical and illegal. 63 P.S. § 1705(2).

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