

October 10, 2023

Daniel Rosenthal, PE (Chair)  
Hearing Care Professionals Technical Review Committee  
Nebraska Department of Health & Human Services  
Attn: Ron Briel, Credentialing Review  
PO Box 94986  
Lincoln, NE 68509-4986  
Sent via e-mail

**POSITION: STRONGLY OPPOSE**

Dear Mr. Rosenthal,

I reach out today as a licensed clinical audiologist practicing in Omaha to emphatically express opposition to the proposed expansion of the scope of practice offered by certain hearing instrument specialists (HIS) and their affiliated entities. These entities, including hearing aid manufacturers, distributors, and franchisees, promote this proposal solely for financial gain. If this ill-conceived initiative is endorsed, it will grant HIS the authority to perform complex audiologic testing, interpretation, and treatment services without the necessary training, qualifications, or supervision. This poses a significant threat to the financial and physical well-being of individuals of all age groups in Nebraska.

Audiologic services, including diagnostic services, cerumen management, tinnitus evaluation and treatment, and aural rehabilitation, are complex procedures that require extensive theoretical and practical training. Yet, the HIS proposal includes a list of suggested educational requirements for licensure that 'grandfather' existing HIS without enhancing their training or qualifications. It purports to enhance requirements for new HIS, however, they will only maintain the status quo (must be 21 years of age and have a high school education). Moreover, the proposal enables the alteration of educational requirements at the discretion of the Hearing Instrument Specialists Board.

The requested expansion is at odds with evidence-based practices in the delivery of audiologic care, particularly when evaluated against the licensing and training requirements for similar and related professions. For example, a clinical doctorate (Au.D.) degree is required for audiologists to enter clinical practice in Nebraska and all 50 U.S. states, the District of Columbia, and territories. Physicians and advanced practice providers, including nurse practitioners, physician assistants, psychologists, and speech-language pathologists, are other professionals authorized under their licensure to perform these services (in whole or in part).

The HIS proposal also conflicts with the existing scope of practice and educational requirements for audiology assistants in Nebraska. Despite the required postsecondary education in Communicative Disorders and Sciences for registered/licensed audiology assistants, they cannot perform the audiologic diagnostic and treatment services described in the HIS proposal.

Occupational licensure laws exist primarily to safeguard consumers rather than to protect and favor industry stakeholders driven by profit from hearing aid sales. I urge the Hearing Care Technical Review Committee to wholly reject the HIS scope expansion proposal. Please reach out with any questions or if I can provide any additional information or expert testimony.

Respectfully,

Noel Griffith, Au.D. (Doctor of Audiology)