



Entheos Audiology Cooperative
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Hearing Care Professionals Technical Review Committee Nebraska Department of Health & Human Services Attn: Ron Briel, Credentialing Review
PO Box 94986
Lincoln, NE 68509-4986

Dear Mr. Rosenthal,

429 E. Dupont Rd, #126 Fort Wayne, IN 46825

My name is Nora Stewart, I am an audiologist and the CEO of Entheos Audiology Cooperative, the largest audiology cooperative in the country. Our Nebraskan audiology members have brought to my attention a grave situation that has compelled me to reach out to you directly. It is with great disappointment and concern that I would like to address the recent proposal to expand the scope of practice of hearing instrument specialists (HIS). One of the duties of this committee is to ensure that the children and adults of Nebraska are provided with healthcare that is safe and free from significant physical and financial risk and harm. The expansion of the scope of practice to include audiologic diagnostic testing, interpretation and treatment services without appropriate education, training, supervision and qualifications is ill advised for a myriad of reasons, number one being safety. These are complex medical procedures that require extensive clinical training to ensure that proper and safe hearing care is provided to our patients. Additionally, you are depriving the citizens/patients of Nebraska of potential Medicare/Insurance reimbursement that is only available to be billed and performed by an audiologist or other qualified medical professional.

The requested scope expansion in the HIS proposal is completely out of step 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 and territories. Physicians and advanced practice providers including nurse practitioners, physician assistants, psychologists, and speech language pathologists are other professionals who are authorized under their licensure to perform these services (in whole or in part) and all hold advanced degrees.

The true perplexing part of this proposal is it is being suggested that the State of Nebraska pass regulations that expand(s) the scope of practice of hearing instrument specialists, but currently the law or the new being proposed law does not allow trained assistants to perform diagnostic and treatment services. So, the individuals with more training, education and experience cannot provide audiologic diagnostic testing and treatment services even though they may have already received some training and have an understanding of how to provide those services, but hearing instrument specialists who are not audiologists, and are not trained as audiological assistants, and have had little or no training in diagnostic and treatment are going to be allowed to provide diagnostic and treatment services? The HIS proposal does not include any substantial education requirements, putting the citizens of Nebraska into the hands of untrained "specialists or techs". This sets a deeply troubling precedent for your citizens with respect to healthcare in general. As a comparison, the scope of practice for audiology assistants in Nebraska, that **does** require postsecondary education, **does not** allow them to perform any of the audiologic diagnostic and treatment services that are described in the HIS proposal. Where is the well thought out, well informed sense in this proposal and how does it benefit the patients of Nebraska?

Occupational licensure laws are designed to protect consumers—not to unfairly protect and advantage industry players seeking only to profit. My concern here is that something is being pushed by



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manufacturers and/ or insurance insurance companies that will increase their profits for their investors while decreasing the quality of health care, decrease the opportunity for diagnostic reimbursement and potentially cause irreparable physical harm to the patients/citizens of Nebraska.

I urge the Hearing Care Technical Review Committee to reject the HIS scope expansion proposal in its entirety. Please contact me if you have any questions, or if I can provide any additional information or expert testimony.

Respectfully,

Nora Stewart
CEO Entheos Audiology Cooperative