

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 write to you today, as a current audiologist in training, striving to work as an audiologist in Nebraska upon graduation, to strongly oppose the scope of practice expansion proposal offered by certain hearing instrument specialists (HIS), affiliated trade organizations, hearing aid manufacturers, distributors, and franchisees, all of whom stand to gain financially from its implementation.

As a current Doctor of Audiology (Au.D.) student that spends countless hours in the classroom and clinical setting, I see how much careful thought and consideration is put into the work of an audiologist for each individual patient. Two patients presenting with similar concerns and diagnostic testing results are likely going to require completely different plans of care. There is no “one size” or “method fits all” approach. That said, it is critical for those providing diagnostic and management services to be properly trained and well informed.

Currently, audiologists use evidence-based techniques to diagnose, treat, and manage hearing and balance disorders with the knowledge they have acquired from years of extensive academic and clinical education. The current HIS proposal would allow hearing instrument specialists to complete additional diagnostic testing, cerumen management, tinnitus evaluations, aural rehabilitation, and more without even a fraction of the training and education that audiologists are required to have in order to perform these services. Even audiology assistants in Nebraska are required to complete postsecondary education and still do not have authorization to perform the services included in the HIS proposal.

In addition to the training required to become an audiologist, current practicing audiologists must keep up to date with research and evidence-based practice through continuing education. The field of audiology is continuing to expand. Despite this, the current HIS scope of practice expansion proposal does not include any information regarding continuing education or additional training that will be required for new or current hearing instrument specialists. This could result in patients receiving inadequate, risky, and outdated care. A high school diploma or equivalent is not enough training for an individual providing these services. I am looking out for the best interests of the individuals who come into our clinics every day, trusting that we will open doors to better communication for them with their community and loved ones. Even as a student, I have seen patients at their most vulnerable. I have heard their stories of being mistreated for the sake of financial gain. What if it were your family member? Everyone should want what is best for the patient, and every patient deserves a well-trained provider.

In conclusion, as an audiologist in training, I strongly oppose the HIS scope of practice expansion proposal. I also urge the Hearing Care Technical Review Committee to reject the HIS scope expansion proposal in its entirety.

Respectfully,

Delaney J. Skretta

Delaney J. Skretta, B.S.