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Mr. Ron Briel
Program Manager
Credentialing Review Program/DHHS Credentialing Review

Dear Mr. Ron Briel:

The Nebraska Hearing Society has requested a credentialing review of Nebraska statutes related to hearing instrument specialists' scope of practice.

The Nebraska Hearing Society proposed amendments that would allow hearing instrument specialists to:

- Administer and interpret testing of human hearing and middle ear function, including tympanometry.
- Determine candidacy for cochlear implants.
- Conduct communication assessment.
- Provide tinnitus management and therapy.
- Perform cerumen management.

I have been an audiologist for 46 years, and during that time, I have worked as the Director of Audiology at a large metropolitan hospital, and an adjunct professor in audiology at the graduate level at an university and medical school. The last 22 years I have been in significant leadership roles dealing with the training and business development for both hearing instrument specialists and audiologists worldwide at the industry level. During my career, I been involved with thousands of hearing instruments specialists. I have been invited to speak at the state, national, and international level and have served on many committees for hearing healthcare professional organizations.

The scope of practice changes by the Nebraska Hearing Society are not in the safe interest of individuals in the state of Nebraska. The requested changes are far from the education and training for hearing instrument specialists. This is particularly noted with determining candidacy for cochlear implants, communication assessment, tinnitus therapy, diagnostic hearing evaluations, and cerumen management.

The state of Nebraska today requires that a hearing instrument specialist have a high school diploma and pass a state examination. The Hearing Society has proposed a 2-year degree

requirement, however this is less than sufficient to meet the requested scope of practice expansion. The hearing instrument specialist's training today or with a 2-year degree would not support the knowledge to interpret diagnostic testing, to determine candidacy for cochlear implants, or to assess or treat communication disorders. This would also not provide formal or practical experience with tinnitus management or cerumen management. Hearing instrument specialists undergo a short in-office and home study training specifically to test hearing to determine the need for a hearing aid. They also are trained in the fitting and counseling of a hearing aid. That is why the term used for their profession is hearing instrument specialist. These individuals do not have training beyond that.

Audiologists undergo training at the doctoral level. Audiologists spend approximately 8 years at the university level where they are trained in the detection and remediation of all disorders of the auditory and vestibular systems. These individuals upon the completion of their program will also have over 1500 clinical hours. These individuals take both a national competency exam and a state administered examination for licensure. Audiologists have both the educational training and the practical experience in all the areas that the hearing instrument specialists have requested; however, the hearing instrument specialists education and training do not include these topics. If hearing instrument specialists would like to practice audiology they should become audiologists.

This request to increase the scope of practice is not safe. It will not be in the best interest of consumers, plus it will cause confusion for consumers on the role and skill of these different professionals. Hearing instrument specialist do not have the background, experience, knowledge or skills to practice these additional requested areas. It is my hope that the credentialing board will not approve the request from the Nebraska Hearing Society,

Sincerely,

Dr. Thomas J. Tedeschi

Audiologist