



October 13, 2023

Mr. Ron Briel, Program Manager  
Credentialing Review Program  
DHHS Credentialing Review  
P.O. Box 94986  
Lincoln, NE 68509-4986  
[Ron.Briel@nebraska.gov](mailto:Ron.Briel@nebraska.gov)

*Re: Opposition to Credentialing Proposal for Nebraska Hearing Society/International Hearing Society*

Dear Mr. Briel,

On behalf of the American Academy of Audiology (the Academy), I write to express our strong opposition to the credentialing review application and proposed practice act amendments submitted by the Nebraska Hearing Society and the International Hearing Society that posit an unprecedented scope of practice expansion for hearing instrument specialists. The Academy is the largest professional organization of, by and for audiologists, in the world. The Academy promotes quality hearing and balance care by advancing the profession of audiology through leadership, advocacy, public awareness and support of research.

**Credentialing Review Application Inaccuracies**

The submitted application is inaccurate in a number of ways. Question #19 of the Credentialing Review Application asks respondents to comment on the “scopes of practice typical for this occupation in other jurisdictions.” The response indicates that each state has “regulations regarding the hearing aid profession” and that the FDA has updated regulations for hearing instrument specialists “which are reflected in our requested statutory changes.” The FDA regulations referenced in this quote, refer to “red flag” warning labeling requirements that the FDA issued in response along with the advent of over-the-counter hearing aids designed to prompt consumers to seek medical attention if they notice certain conditions. The FDA did NOT make any changes to regulations relative to hearing instrument specialists.

The FDA regulations make no mention of cerumen management, tinnitus management, cochlear implant candidacy, tympanometry, identification of potential otological conditions, communication assessment and speech audiometry or the subjective interpretation of test results beyond degree of hearing loss. The application characterizes these expansions in scope of practice as “a comprehensive description of what qualifies as dispensing of hearing instruments.”

The application proposal would not “enhance the authorized scope of practice for audiologists”, but rather would provide an unprecedented scope of practice expansion for hearing instrument specialists only and allow them to provide an array of services well beyond the selection and fitting of hearing instruments—their current scope of practice as appropriately reflected in their title.

### **Critical Differences Between Education/Training of Hearing Instrument Specialists and Audiologists**

In order to become a hearing instrument specialist in Nebraska, an applicant must be 21 years of age, hold a high school diploma and pass a qualifying examination. The submitted application proposes changing these requirements to add a two-year degree and an unspecified term of practicum. However, the proposed language would also accept in lieu of this enhanced educational requirement, anyone who holds a license from another jurisdiction; is certified by the National Board for Certification in Hearing Instrument Sciences at the time of taking the examination; or holds an advanced credential offered by the International Hearing Society at the time of taking the examination. It should be noted, that the certification by the National Board for Certification in Hearing Instrument Sciences and the advanced credential referenced are both owned and administered by the International Hearing Society, one of the parties to the submitted proposal.

The appropriate scope of practice for an individual with this level of education and training should be appropriately limited to non-invasive tasks and skills associated with the fitting of a hearing aid. By no means should this scope of practice be expanded to include invasive procedures such as cerumen removal or tinnitus management based solely on the completion of a short-term certificate course. The proposal outlines a scenario in which hearing instrument specialists would “have an arrangement with a medical liaison” to whom the hearing instrument specialist would refer a patient in the event that of any trauma.” The proposal does not outline any actual supervision requirements between the hearing instrument specialist and said physician. Also, any licensed hearing instrument specialist should already be referring any patient that exhibits any sign of trauma to a physician. In addition, the appropriate scope of practice should never include subjective interpretation of tests, determination of cochlear implant candidacy, communication assessment, tympanometry or the identification of potential otological conditions.

In comparison, audiologists are doctoral-level professionals who undergo four years of rigorous post-graduate education. This includes academic education, clinical training, and a required national exam. They are qualified to detect underlying medical conditions; to perform cerumen management; and to diagnose and treat tinnitus, hyperacusis, vestibular issues, auditory processing disorders, and hearing loss. Audiologists undergo extensive training in cerumen management and work with hundreds of patients before they are allowed to obtain a professional license and perform these procedures independently.

### **Disconnect Between IHS Statement of Scope/Duties and Proposed Expansion**

The Nebraska application inquires as to why the requestor is seeking a change in their scope of practice. The response provides that “the group is already regulated but would like to be more uniformly in line with our governing body’s (IHS) scope of practice.” However, IHS itself (one of the authors of the proposed scope expansion) states on its own website that *“Hearing Aid Specialists are allied health professionals who have the training, knowledge and experience required to address the amplification needs of individuals with hearing loss. The primary employment responsibilities include: Administering and interpreting tests of auditory function; Recommending amplification options; Making ear impressions; Fitting and dispensing hearing instruments; Verifying and validating hearing instrument*

fittings; Counseling regarding hearing loss; Providing aural rehabilitation including options for assistive listening devices and providing comprehensive post-fitting care.”<sup>1</sup> The scope expansion as listed in the Nebraska proposal is not consistent with the stated scope and job duties listed on the requestor’s own website.

The National Institute on Deafness and Other Communication Disorders (NIDCD) that falls beneath the umbrella of the National Institutes of Health provides guidance on the types of professionals that provide services to individuals with hearing loss and identifies the appropriate role for each profession. NIDCD provides that *“a hearing instrument specialist, also known as a hearing aid specialist, is a state-licensed professional who conducts basic hearing tests, fits and dispenses hearing aids, and educates individuals and their family members about their hearing loss. The licensure requirement varies among states; most states require completing a 2-year apprenticeship.”<sup>2</sup>*

### **Conclusion**

In conclusion, the proposed scope of practice expansion for hearing instrument specialists in Nebraska is not supported by the education and training requirements, typical state scopes of practice for these professionals in other states nor the statements and information disseminated by the International Hearing Society itself or other third-party experts. In addition, the underlying credentialing review application that was submitted contains multiple inaccuracies. For these reasons, the American Academy of Audiology stands in strong opposition to this proposal as we believe these changes are not in the best interest of the health, safety and welfare of individuals seeking assistance with hearing loss. If you have any questions about any of the information contained within, please contact Susan Pilch, JD, Senior Director of Government Relations at [spilch@audiology.org](mailto:spilch@audiology.org).

Sincerely,

A handwritten signature in black ink, appearing to read 'Bopanna Ballachanda', with a long horizontal flourish extending to the right.

Bopanna Ballachanda, PhD  
President, American Academy of Audiology

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<sup>1</sup> [Become a Hearing Aid Specialist | IHS Professional Development \(ihsinfo.org\)](http://ihsinfo.org)

<sup>2</sup> [Who Can I Turn to for Help with My Hearing Loss? | NIDCD \(nih.gov\)](http://nih.gov)