

12/15/2023

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 write to you today, as a licensed clinical audiologist, practicing in Omaha, Nebraska, to strongly oppose the scope of practice expansion proposal offered by hearing instrument specialists (HIS). This is a poorly-conceived proposal which would authorize and allow Hearing Instrument Specialists to perform audiologic diagnostic testing, interpretation, and treatment services for patients of any age, including vulnerable pediatric patients and patients suffering from debilitating tinnitus. Hearing Instrument Dispensers do NOT have the appropriate training, qualifications, or supervision to provide these services, putting vulnerable Nebraskans at significant risk of harm.

Audiologic services, including diagnostic services, cerumen management, tinnitus evaluation and treatment, and aural rehabilitation are complex procedures that require extensive didactic and clinical training. This is especially true for infants and young children and for patients with debilitating tinnitus. Yet, the HIS proposal includes a list of proposed educational requirements for licensure that 'grandfather' existing hearing instrument specialists with no increase in training or improved qualifications. The proposed regulations for new HIS, simply maintain the status quo (must be 21 years of age and have a high school education). Further, the proposal allows the educational requirements to be changed arbitrarily at the discretion of the Board.

The requested scope expansion in the HIS proposal is counter to known evidence-based practices in the delivery of audiologic care, particularly when evaluated against the licensing and training requirements for Clinical Audiologists and similar related non-physician providers. The HIS proposal is even out of step with existing scope of practice and educational requirements for audiology assistants in Nebraska. Even though Nebraska requires postsecondary education for registered audiology assistants, they are still not authorized to perform any of the audiologic diagnostic and treatment services described in the HIS proposal.

Occupational licensure laws are designed to protect consumers, but the proposed changes in the HIS scope of practice do not provide the consumer and patient protections that are needed. 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,

Leisha R. Eiten, Au.D, CCC-A, CH-TM
Clinical Audiologist and Certificate Holder in Tinnitus Management