

November 20, 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 am contacting you to strongly oppose the potentially dangerous expansion in scope of practice proposed by hearing instrument specialists and other stakeholders, who stand to gain financially from its implementation.

I am a clinical doctor of audiology (AuD). I committed myself to 8 years of education from an accredited university which is the requirement for clinical practice as an Audiologist in all 50 States. I have been in private practice in Columbus, Nebraska since 1992 and this change makes a sham of my education and dedication not to mention, puts those seeking help for hearing loss at further risk. Unbelievably to me, this proposal will authorize a hearing instrument specialist with limited education (high school) and possibly very little training to perform diagnostic hearing tests, interpretation, identification of hearing loss and treatment. The average person on the street doesn't even realize, now, that they may be seen by someone for hearing services who is licensed by the State of Nebraska to sell hearing aids, but not educationally qualified to provide best practice evaluation, identification and treatment of hearing loss. I have this discussion daily with folks who come into my office. I believe the State license is obtained to protect the consumer and ensure a certain level of education and training by the license holder. This expansion would be completely out of line with accepted best practice and put all Nebraskans with hearing loss at risk.

The HIS proposal is also out of line with existing scope of practice and educational requirements for audiology assistants in Nebraska. Nebraska requires postsecondary education for licensed audiology assistants, who are supervised by Audiologists but still not authorized to perform any of the audiologic diagnostic and treatment services described in the HIS proposal.

I urge the Hearing Care Technical Review Committee to reject the HIS scope expansion proposal in its entirety. Please don't hesitate to contact me if you have any questions or need any further clarification.

Sincerely,

Nora L. Fuchs, AuD
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