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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

Dear Mr. Rosenthal,

I write to you today, as a licensed clinical audiologist, practicing in Burlington, Colorado, St Francis, Kansas, and Colby, Kansas to strongly oppose the scope of practice expansion proposal offered by hearing instrument specialists (HIS), affiliated trade organizations, hearing aid manufacturers, distributors, and franchisees, all of whom stand to gain financially from its implementation. This ill-conceived proposal, if enacted, will authorize HIS to perform audiologic diagnostic testing, interpretation, and treatment services, without appropriate training, qualifications, and supervision, putting Nebraskans of all ages at significant risk of financial and physical harm. Occupational licensure laws are designed to protect consumers—not to unfairly protect and advantage industry players seeking only to profit.

As an audiologist that practices specifically in Northwest Kansas, I see patients from Nebraska frequently. Some have been seen by an HIS as they are more prevalent in rural areas. I currently see how poor these “providers” are and already clean up mistakes they make that are within their scope. They are trained so minimally that most are just not very adept at their job. They are focused on selling a product to make money. Audiologists are the hearing healthcare providers that are adequately trained to treat hearing loss. Expanding the scope of practice for people with a few weeks of mostly unsupervised training to include things that require a doctorate is an asinine decision. Some of the patients I have acquired were grossly underfit and/or ill advised.

I urge the Committee to keep Nebraska’s residents safe, by rejecting the HIS practice expansion to ensure that high-quality audiologic care will be provided to citizens throughout the region. Audiologic services, including diagnostic services, cerumen management, tinnitus evaluation and treatment, and aural rehabilitation are complex procedures that require extensive clinical training. Yet, the HIS proposal includes a list of proposed educational requirements for licensure that ‘grandfather’ existing HIS’ with no increase in training or improved qualifications and feign enhanced requirements for new HIS, that, upon careful inspection, 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.



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The requested scope expansion in the HIS proposal is completely out of step with evidence-based practices in the delivery of audiologic care, particularly when evaluated against the licensing and training requirements for similar and related professions. For example, a clinical doctorate (Au.D.) degree is required for audiologists to enter clinical practice in Nebraska and all 50 U.S. states and territories.

The HIS proposal is also wholly incongruent with existing scope of practice and educational requirements for audiology assistants in Nebraska. Even though Nebraska requires some 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 who have minimal education.

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,

Rachel McArthur, Au.D.