

November 21, 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

POSITION: STRONGLY OPPOSE

Dear Mr. Rosenthal,

I write to you today, as a concerned resident of Nebraska, to strongly oppose the scope of practice expansion proposal offered by certain hearing instrument specialists (HIS) and other entities, all of whom stand to advance financially from its implementation. This poorly designed proposal, if sanctioned, will authorize hearing instrument specialists to perform audiologic diagnostic testing, interpretation, and treatment services, without appropriate training, qualifications, and supervision, putting Nebraska residents of all ages at significant risk of not only financial but also physical harm.

Services such as diagnostic testing, cerumen management, and aural rehabilitation should be provided by those with extensive training and the connections to make the proper referrals should medical intervention be needed. I am concerned that with the basic educational requirements for HIS it would put myself and my fellow Nebraskans at risk. I am a parent of a child with a hearing loss and also have a parent who is struggling with age specific hearing disabilities. The knowledge that the provider for those that I love has a doctoral degree and extensive clinical experience allows me to feel secure that the services my family is receiving are up-to-date evidence-based practices. I also worry that individuals that are unaware of the contraindication for being seen by a simple hearing instrument specialist would receive less than adequate care.

As I know it, the current licensure laws are synonymous across all 50 states. While I applaud Nebraska for looking at ways to make access to healthcare more accessible, I truly feel that the current licensure law is designed to protect patients. I urge the Hearing Care Professionals 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.

Respectfully,

Kathleen Feller
Concerned Resident of Nebraska
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