

November 17, 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 an audiologist in training, practicing in Missouri but moving to practice in Nebraska July of 2024, 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.

These complex services have historically been provided by licensed audiologist who undergo extensive educational and clinical training to become competent in diagnostic services, cerumen management, and aural rehabilitation. After four years of undergraduate work, four years of doctoral work, and over 1,500 hours of supervised clinical experience, per Nebraska's scope of practice for audiology I can legally provide , "(1) cerumen removal from the cartilaginous outer one-third portion of the external auditory canal when the presence of cerumen may affect the accuracy of hearing evaluations or impressions of the ear canal for amplification devices and (2) evaluation, selection, fitting, and dispensing of hearing instruments, external processors of implantable hearing instruments, and assistive technology devices as part of a comprehensive audiological rehabilitation program." My countless hours in the classroom, clinically training, and studying on my own has led me to feel clinically competent to provide these services. This current proposal for HIS includes rudimentary educational requirements for licensure that allow individuals to be 'grandfathered in' with no increase in training. Furthermore, the educational requirements laid out in this proposal provide no structure and allow for the requirements to be changed at random discretion of the Board.

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 from an accredited university is required for audiologists to enter clinical practice in Nebraska and all 50 U.S. states. Physicians and advanced practice providers including nurse practitioners, physician assistants, psychologists, and speech language pathologists are other professionals who are authorized under their licensure to perform these services.

The HIS proposal is does not align 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—not to unfairly protect and

advantage industry participants seeking only to profit from hearing aid sales. I urge this Review Committee to reject the HIS scope expansion proposal in its entirety in order to protect Nebraskans from risk of physical and financial harm. Please contact me if you have any questions, or if I can provide any additional information.

Respectfully,

Ava Feller, M.S.

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Doctorate of Audiology Student