16 November 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 writing to you as an audiologist in training in Nebraska, as well as the daughter of a loved one with a vestibular schwannoma, to strongly oppose the scope of practice expansion proposed by hearing instrument specialists (HIS) in the state of Nebraska. This ludacris proposal, if enacted, would put the hearing healthcare of Nebraskans at risk.

I have been training for the past seven years in my undergraduate and graduate education to be able to perform the services that are being proposed. Diagnostic audiological services, cerumen management, tinnitus evaluation and treatment, and aural rehabilitation are services that require an extensive amount of background knowledge and clinical training to be able to provide. When I graduate with my doctorate in audiology, I will have a minimum of 1820 hours of supervised clinical practicum hours. I will also be required to pass several exams, including a national board exam (Praxis in Audiology). In contrast, a HIS does not have nearly this extensive of training. Simply put, these individuals have a high school education, are at least 21 years old, and need to pass a simple exam.

Almost a year ago, my father was diagnosed with a vestibular schwannoma. This is a tumor that invades the vestibulocochlear nerve in the brain causing hearing loss and dizziness. This rare disorder was caught early due in part to his audiologist's knowledge and extensive clinical experience. An audiologist is trained to know when to refer to a physician for medical management and imaging in these sorts of cases. I fear that an HIS does not have the training and expertise to know when to refer for additional testing. If my father had gone to an HIS for his audiological care, his brain tumor could have possibly been missed, resulting in severe complications. Clearly the scope expansion outlined in this proposal is unethical to the premises of audiological care.

Thank you for your time and consideration.

Sincerely,

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Lauren Secilmis, B.S.