

Kissel, Kohout, ES Associates LLC

301 South 13th Street Suite 400 Lincoln, Nebraska 68508 kisselkohoutes.com Phone: 402-476-1188

Fax: 402-476-6167

June 9, 2023

Mr. Ron Briel, Program Manager Credentialing Review Program DHHS Credentialing Review P.O. Box 94986 Lincoln, NE 68509-4986 VIA ELECTRONIC AND U.S. MAIL

RE: Credentialing Review for the Nebraska Hearing Society

Mr. Briel,

Please accept this letter to serve as the Nebraska Hearing Society's (NHS) letter of intent to pursue credentialing review of Nebraska statutes relating to hearing care professionals.

The Nebraska Hearing Society is comprised of Board-Certified Hearing Instrument Specialists, Licensed Hearing Instrument Dispensers, and Audiologists from across the state. NHS is dedicated to increasing the level of excellence of hearing healthcare through continuing education, professional review, and consumer protection.

The purpose of the requested review is to enhance the authorized scope of practice for licensed Audiologists, Hearing Instrument Specialists, and Hearing Instrument Dispensers to better serve hearing impaired patients throughout Nebraska. The proposed changes can be summarized as:

- 1. Allow Hearing Instrument Specialists to provide cerumen management.
- 2. Ensure that Hearing Instrument Specialists and Audiologists can order the dispensing of the newly created over the counter and prescription hearing aid categories following the August 2022 U.S. Food and Drug Administration final rule.
- 3. Provide a comprehensive description of what qualifies as "dispensing of hearing instruments".
- 4. Update filing and examination requirements as well as hearing assessment protocols.

The changes that the society would seek are through amendments to sections 38-511, 38-1501,

38-1502, 38-1504, 38-1505, 38-1506, 38-1508, 38-1510, 38-1511, and 38-1514 of Reissue Revised Statutes of Nebraska, and sections 38-121, 38-1509, 38-1512, and 38-1513 of Revised Statutes Cumulative Supplement.

We anticipate that a completed application for Credentialing Review could be ready to submit by July 15, 2023. I will serve as the contact person for the Nebraska Hearing Society throughout this application process and can be reached at the address and telephone number above.

Hearing healthcare professionals are members of a distinct discipline. The Nebraska Hearing Society is proud to have assisted this field in the past with the development of a wide range of evidence-based procedures to better serve the community. With these statutory changes, we are eager to continue that progress.

We look forward to working with the Department of Health and Human Services and await your notification of the next steps in the process. If you have any questions or require more information, please don't hesitate to contact me.

Sincerely, FOR THE NEBRASKA **HEARING** SOCIETY

Joseph D. Kohout