

December 20, 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 certified and licensed speech language pathologist, working in the community of Grand Island, NE. I strongly oppose the scope of practice expansion proposal offered by certain 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.

I live and work in Grand Island which can be considered a hub for medical and professional services in central Nebraska. Adults and children travel from rural areas of our state to receive quality speech and language therapy as well as audiological services in Grand Island. Specifically, I serve families in Grand Island through early intervention services (children birth to 5 years old). Many of my families are from different cultural and ethnic backgrounds who are experiencing their first opportunities to quality medical care. There may be a language barrier that causes confusion. They are often hesitant to seek out care without our support. We frequently make referrals to licensed and certified audiologists for the purpose of evaluation, diagnosis, and management or treatment of an array of ear health and hearing needs. We make referrals as hearing skills directly impact overall development during these critical years. My families trust that I am referring to a qualified professional who has the education and experience to serve them in the best ways possible.

The audiologic services I am referring to include, including diagnostic services, cerumen management, tinnitus evaluation and treatment, and aural rehabilitation are complex procedures that require extensive didactic and 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.

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, the District of Columbia, and territories. 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 (in whole or in part).

The HIS proposal is also wholly incongruent 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 players seeking only to profit from hearing aid sales. 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,

Meredith Davis, M.S., CCC-SLP

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