

Daniel Rosenthal, PE (Chairperson)
Hearing Care Professionals Technical Review Committee
Nebraska Department of Health and Human Services
Attn: Ron Briel, Credentialing Review
PO Box 94986
Lincoln, NE 68509-4986

RE: Opposition to Expand the Scope of Practice of Hearing Instrument Specialists in Nebraska

To Whom It May Concern,

My name is Ashley Kaufman, and I am writing to oppose the expansion of the scope of practice for hearing instrument specialists (HIS) in the State of Nebraska. The proposed expansions are inappropriate for the level of education required by a HIS in Nebraska and could compromise the safety of care provided to patients with a hearing difference.

To receive a license in audiology, an individual must have a Doctorate of Audiology degree which requires graduate degree training in anatomy and physiology of the auditory and vestibular system, psychoacoustic, diagnostic and clinical assessment of adult and pediatric patients, specialized training in hearing instrumentation, cochlear implantation and aural rehabilitation. In addition, there is mandatory clinical training hours and the passing of a national board exam. The proposed expansion for HIS to be allowed to complete cerumen management, aural rehabilitation, the broad description of "all other acts of hearing assessment pertaining to hearing testing" and the removal of the age restrictions of patients that they could see would be negligent in light of their education. A HIS is only required to be the age of 21, have a high school diploma or equivalent, pass a qualifying exam where the definition of the exam is removed and allows for a waiver of said exam and removes a statement that would require licensure to have medical competencies. This lack of education could lead to many patients being misdiagnosed or missed with significant medical conditions that can drastically impact a patient's life or in some cases lead to death (cranial nerve tumors).

As a pediatric audiologist, I find the proposed lack of educational requirements, lack of required supervised clinical training/experience requirement, ill-defined, non-accredited and waivable exam, and the removal of the age restrictions of the patients that a HIS could see to be frightening. Children require specialized tests and skills that a HIS would not have the training to complete and interpret. The "all other acts of hearing assessment" phrasing leaves too much allowance for an untrained individual to be able to administer specialized these services needed for pediatric patients. The outcome of a child's speech and language development, academic development, social and psychological development and safety depend on accurate test results AND accurate and appropriate amplification recommendations and fitting. Their academic and occupational success is result of accurate and early diagnosis of their hearing loss and appropriate treatment by an audiologist trained in pediatric audiology. The general population, including the parent(s) of children with hearing loss, do not understand the difference between the experience, education and licensure of an audiologist and a HIS and it is stated purpose of professional licensure laws to provide protections that outline clear legal definitions and requirements so children will receive safe and appropriate care.

For the health and safety of all those I serve and those in need of hearing healthcare, please reject the proposed expansion of the scope of practice of hearing instrument specialists in the State of Nebraska.

Sincerely,

Ashley Kaufman, Au.D., CCC-A
Senior Pediatric Doctor of Audiology