

November 15, 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 write to you today, as a current Doctor of Audiology (AuD) student, a citizen of the state of Nebraska, and a hopefully a future licensed Audiologist in the state of Nebraska, to 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. If this proposal is enacted, it 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.

Audiologic services, including diagnostic services, cerumen management, tinnitus evaluation and treatment, and aural rehabilitation are complex procedures that require extensive clinical training. As a current audiology student, I have learned the importance of the extensive and thorough training for my profession. My classmates and I have our bachelor's degrees in communication Disorders from accredited universities. Towards the end of working for our AuDs, we will take the praxis to obtain our audiology licenses. Meanwhile, we will obtain almost 2000 hours clinical hours before receiving our Doctor of Audiology degrees. Each week, I attend class for 8 hours, spend 16+ hours at my clinical placements, study, and working on assignments. Not to mention, to pass, we must have a score of 83% or higher for all work we complete. Audiology assistants must hold an associate or bachelor's degree and cannot perform diagnostic or treatment services. Compared to a hearing aid specialist, they only need a high school diploma or GED but are allowed to administer hearing tests and fit hearing aids. It is already unjustifiable that HIS have a larger scope of practice than an Audiology assistant. The difference between an Audiologist and a HIS is confusing for many patients I see at my clinical placements, which is why I am concerned that this proposition for expanding the scope of practice for HIS will make patients more confused.

Services the hearing instrument specialists are seeking to perform include variety of diagnostic procedures, cerumen management, tinnitus evaluation and treatment, and aural rehabilitation. As a current audiologist in training, it is infuriating to see that this proposed expansion of HIS scope of practice would allow them to perform many complex clinical tasks that require specialized training only audiologists and otologists receive. This expansion will overlook the years of specialized training I am currently undergoing. As a student, Nebraska citizen, and future audiologist, I am highly concerned about the lack of defined training and measures to evaluate the knowledge and skills for HIS to perform these procedures listed above. Additionally, this proposal would allow for all current HIS to be grandfathered in with no additional training or improved qualifications to provide these specialized services. The proposal has no revised requirements for new individuals applying for licensure as an HIS, still only requiring the individual to have a high school diploma. If this proposal does pass, it will hurt the credibility of audiologists and undermine the audiology profession. It would make me question as a future audiologist if I would want to stay in Nebraska.

In conclusion, I strongly oppose the proposed expansion of scope of practice due to the current training and education requirements of a hearing instrument specialist. Without the proper training and education, an individual should not provide higher services that could be detrimental to patients. I appreciate you taking the time to read this letter and hope you consider this information when moving forward with a decision regarding this proposal and the hearing healthcare of our fellow Nebraskans.

Respectfully,

*Lydia Teegerstrom*

Lydia Teegerstrom, B.A.