

May 21st, 2024
Technical Review Committee
Nebraska Department of Health & Human Services
PO Box 94986 Lincoln, NE 68509-4986

RE: Nebraska Credentialing Review for the Nebraska Hearing Society,
Credentialing Review Program (407)

Dear Technical Review Committee members,

My name is Scott Jones (spelled S-C-O-T-T J-O-N-E-S) and I am a board certified hearing instrument specialist. I have been happy to call this my profession for the last 22 years.

I appreciate the opportunity to speak today in support of the scope of practice change for Hearing Instrument Specialists (HIS). I believe the proposal before you represents collaboration between interested parties to protect and enhance the health and safety of Nebraskans. These important changes include clarity on tinnitus care as well as the addition of cerumen removal under limited circumstances by qualified hearing instrument specialists.

You have heard today about the burdens faced by Nebraskans in receiving timely and efficient hearing care, and the need for this scope change in order to more efficiently address those challenges. If this scope change is adopted, in addition to the education requirements required to become a Hearing Instrument Specialists (HIS), those HIS wanting to perform cerumen management would have to meet several requirements.

The HIS would be required to successfully complete a board-approved cerumen removal course.

They will also be required to take an additional hour of continuing education each year, and that hour must be specific to cerumen removal. These continuing education requirements are in addition to current requirements, which include infection control training.

Additionally, they will be required to have an arrangement with a medical liaison, in order to refer a patient experiencing any contraindications to cerumen removal.

We believe the inclusion of these education requirements will prepare HIS performing cerumen removal appropriately, and most importantly will protect public safety.

In addition, this scope change is in line with the stated goals of Governor Pillen's administration. Governor Pillen has been committed to enhancing Nebraska's workforce by reducing regulatory burdens on businesses and the labor market, stating in his 2024 State of the State Address, "To support and grow these incredible economic assets, among our chief goals in state government must be to get government out of the way, reduce regulations and bureaucratic hurdles, and empower people and businesses to thrive...together we can get government out of the way." We feel this proposal will reduce barriers to individuals seeking healthcare, as well as reduce barriers for those Hearing Instrument Specialists who wish to provide additional services their clients need.

As we analyzed the six statutory criteria necessary for a change in scope, it became more and more evident that our proposal exceeds these standards.

You have heard extensively today why the current scope for HIS is inadequate and inefficient for patients, especially those in assisted living facilities and individuals who lack access to transportation.

Allowing these professionals to perform cerumen removal will reduce these burdens and increase access to quality care.

Additionally, the proposed scope before you includes extensive safeguards for patient health and welfare while delivering efficiency.

Through a mandatory educational course, competency exam, licensing period, and increased continuing education requirements, we are confident that HIS who wish to perform the services outlined in the scope will be more than prepared to do so.

We are hopeful that the committee will reach the same conclusion that we have, which is that this scope of practice change represents a reasonable compromise between interested parties and helps better serve hearing impaired individuals across Nebraska.

This scope change reduces barriers and simplifies hearing healthcare for all Nebraskans, and will provide benefits across the state. We appreciate your time and would encourage your support of the changes in this proposal.