



April 23, 2024

Members of the Hearing Instrument Specialists Technical Review Committee:

The Nebraska Medical Association (NMA) provided comment on the Nebraska Hearing Society's application in September 2023. As we indicated at that time, our physician members believe it is appropriate for the Hearing Instrument Specialist Practice Act to reflect the reality of how Hearing Instrument Specialists (HIS) practice. The NMA provided a number of recommendations, primarily related to cerumen management, to ensure appropriate training, safeguards, and referral mechanism were in place. The applicant group accepted those recommendations regarding cerumen management, and we appreciate those recommendations being incorporated into the revised proposal that is before you today.

The NMA has continued to monitor the HIS credentialing review process, and we appreciate the continued dialogue between the applicant group and other hearing care professionals, including the audiologists. In particular, the NMA has been paying attention to the conversation regarding the role of hearing instrument specialists as it relates to individuals with tinnitus. The most recent HIS proposal would authorize HIS to provide "tinnitus care as contained within the hearing instruments, through tinnitus maskers, in accordance with the manufacturer's audiology department staff." The proposal further defines "providing tinnitus care" as "the selection of tinnitus care devices as contained within the hearing instruments and tinnitus maskers, which shall be used only in accordance with the manufacturer's audiology department staff."

The NMA believes there are situations where it may be appropriate and convenient for an HIS to activate tinnitus maskers contained within hearing instruments. Our physician members believe that additional provisions should be included in the final statutory language to ensure individuals with tinnitus receive medical care from a physician to help manage their condition. For example, it would be appropriate to require a written recommendation from a licensed physician prior to activating the tinnitus masking features of a hearing instrument. Additionally, it would be appropriate to require referral back to a physician if the individual needs tinnitus services outside of the written recommendation. Finally, previous versions of the proposal included training requirements for HIS that were specific to tinnitus. The NMA believes tinnitus-specific training was a positive feature of the proposal and should be included in the final statutory language.

We appreciate the collaboration of the Nebraska Hearing Society, other interested parties, and the technical review committee throughout the HIS credentialing review process.

Sincerely,

A handwritten signature in black ink that reads "John J. Trapp".

John Trapp, MD, FCCP
NMA President