

October 12, 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 licensed audiologist, practicing in Lincoln, NE, to strongly oppose the proposed scope of practice expansion for individuals who hold a Hearing Instrument Specialist (HIS) license in the state of Nebraska, affiliated trade organizations, hearing aid manufacturers, distributors, and franchisees. All these individuals and entities stand to gain financially if this scope of practice expansion is implemented, which should not be reason to approve this suggested change. The proposal, if enacted, would allow for HIS to perform specialized audiological services including diagnostic testing, interpretation of these diagnostic tests, and treatment services, without appropriate training, qualifications, and supervision. In addition, there is no mechanism currently to assess the knowledge and skills required to ensure an individual seeking an HIS license is competent to provide these specialized services. Therefore, this lack of education and training for HIS would put 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 didactic and clinical training. Yet, this proposal would allow for all currently active HIS licensees to be “grandfathered” in with no additional training or improved qualifications to provide these specialized services. Additionally, the proposal has feigned enhanced requirements for any new individuals applying for licensure as an HIS, still only requiring the individual be 21 years of age and have a high school diploma. Further, the proposal allows the educational requirements to be changed arbitrarily at the discretion of the state’s Hearing Instrument Specialist Board.

The requested scope of practice expansion for licensed HIS in the submitted proposal is completely out of step with evidenced-based practices in the delivery of audiologic care, particularly when compared to the licensing and training requirements for similar and related professions. For example, a minimum of a clinical doctorate (Au.D.) degree from an accredited university is required for audiologists to be eligible for state licensure and enter clinical practice in Nebraska and the remaining 49 states, the District of Columbia, and territories. Physicians and other advanced practice providers, including nurse practitioners, physician assistants, psychologists, and speech language pathologists, are additional professionals who are authorized to provide these aforementioned services (in whole or in part) under their license.

When also considering another occupation within hearing healthcare clinics, i.e., audiology assistants, the HIS proposal is wholly unequal with their current scope of practice and educational requirements in Nebraska. Current educational requirements for audiology assistants require education beyond that of a

high school diploma, and yet they are still not allowed to perform any of the audiologic diagnostic and treatment services outlined in the HIS proposal.

Occupational licensure laws are designed to protect consumers. By accepting the HIS proposal as written, Nebraskans would be put at risk of physical harm strictly based on the lack of educational and clinical training currently required to obtain an HIS license in our state. I urge the Hearing Care Technical Review Committee to reject the HIS scope of practice proposal in its entirety. Please contact me should you have any additional questions, or if I can provide any additional information or expert testimony.

Respectfully,

A handwritten signature in blue ink that reads "Kelly L. Pritchett, AuD". The signature is written in a cursive, flowing style.

Kelly L. Pritchett, AuD, CCC-A
Doctor of Audiology
Nebraska Licensed Audiologist (#222)