

October 16, 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 wife, mother, mother-in-law, and daughter of loved ones who are Deaf or hard of hearing. All family members have sought treatment following accurate diagnosis from licensed audiologists trained to the highest level of competency. This led me to a career in audiology, and eventually to teaching students at the graduate level. I have had the honor of serving hundreds of deaf and hard of hearing patients, and training dozens of students over my career. Achieving competency of skills requires significant clinical and didactic training. Without this educational training, patients are placed in jeopardy of misdiagnosis &/or wrongful treatment practices. Misdiagnosis can lead to patients not being referred for proper medical or surgical intervention, or spending their hard earned money on treatments that are not necessary or appropriate. Because of these reasons, I strongly oppose the scope of practice expansion proposal offered by certain hearing instrument specialists (HIS), affiliated trade organizations, and hearing aid manufacturers, all of whom stand to gain financially.

Hearing Instrument Specialists are simply required to be age 21 and have a high school education. In comparison, audiologists are trained to the professional doctorate level, as are other medical professionals including dentists and chiropractors. Why? Because diagnostic testing, interpretation, and treatment services, without appropriate training, qualifications, and supervision, puts Nebraskans at risk!

Current occupational licensure laws are designed for one purpose – to protect consumers. Nebraska requires postsecondary education for registered audiology assistants, yet they are not authorized to perform any of the audiologic diagnostic and treatment services described in the HIS proposal. Again, the requirements for HIS is simply a high school education and to be age 21. This would be uncharted and dangerous territory. I urge the Hearing Care Technical Review Committee to reject the HIS scope expansion proposal in its entirety.

Respectfully,

Stacie Ray, AuD, Professor of Practice

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