

November 20, 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,

As a clinical audiologist licensed and practicing in Nebraska, I strongly urge you to 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 from its implementation. This proposal, if enacted, will authorize HIS to perform audiologic diagnostic testing, interpretation, and treatment services, without appropriate training, qualifications, and supervision, potentially putting Nebraskans of all ages at significant risk of physical and financial 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 HIS proposal includes a list of proposed educational requirements for licensure that 'grandfather' existing HIS with no additional training or adequate qualifications and feign enhanced requirements for new HIS. These requirements, upon careful inspection, merely maintain the status quo (i.e. must be 21 years of age with a high school education). Further, the proposal allows the educational requirements to be changed arbitrarily at the discretion of the Board.

The requested scope expansion in the HIS proposal is out of step with evidence-based practices in the delivery of audiologic care, particularly when evaluated against the licensing and training requirements for similar and related professions. For example, a clinical doctorate (Au.D.) degree from an accredited university is required for audiologists to enter clinical practice in Nebraska and all 50 U.S. states, the District of Columbia, and territories. Physicians and advanced practice providers including nurse practitioners, physician assistants, psychologists, and speech language pathologists are similar professionals who are authorized under their licensure to perform these services, in whole or in part.

The HIS proposal is also wholly incongruent with existing scope of practice and educational requirements for audiology assistants in Nebraska. Nebraska requires postsecondary education for registered audiology assistants, and yet they are still not authorized to perform any of the audiologic diagnostic and treatment services described in the HIS proposal.

Occupational licensure laws are designed to protect consumers—not to unfairly protect and advantage industry players seeking only to profit from hearing aid sales. I urge the Hearing Care Technical Review Committee to reject the HIS scope expansion proposal in its entirety. Please contact me if you have any questions, or if I can provide any additional information.

Respectfully,

Sarah Al-Salim, AuD, CCC-A
Doctor of Audiology