

November 21, 2003

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 am writing to you today to state my strong opposition to the proposed changes to the hearing instrument specialists (HIS) scope of practice currently in review.

As found on the DHHS website: Audiologists perform the functions necessary for the prevention, assessment, habilitation, rehabilitation, and maintenance of persons with hearing, auditory function, and vestibular function impairments and related impairments. In order to achieve the level of education necessary to practice, Audiologists must earn a Doctoral degree in Audiology, with many more earning their Certificate of Competency through the American Speech Language Hearing Association (ASHA) which requires an additional 9 month fellowship. In addition, AuD's are required to earn, at a minimum, 20 hours of approved continuing education in order to maintain their licensure with the state of Nebraska.

The current scope expansion in the HIS language significantly reduces the level of skill, knowledge, theory and critical thinking/decision making required of a currently practicing doctor of audiology putting Nebraska's at risk for harm due to the lack of training required in the proposed HIS scope of practice. Current industry standards include the audiologist must have course work or continuing education in the areas of ethics, cultural competency, cultural humility, culturally responsive practice, or diversity, equity, and inclusion.

Finally, with the proposed language, I have serious concern that the field of audiology would no longer be necessary and would prevent prospective students to consider other occupations. Additionally, universities, including the University of Nebraska, would be forced to seriously consider cutting programs which would impact our Nebraska youth.

Please feel to reach out to me if you should have any questions or would like to engage in further dialogue. I can be reached at mlruskamp@columbushosp.org or 402-562-4488.

Respectfully submitted,

Michell Ruskamp, M.S., CCC-SLP
Assistant Director, Columbus Community Hospital Rehab Services
President, Nebraska Speech Language Hearing Association