

November 13, 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 licensed clinical audiologist, I am in strong opposition to the scope of practice expansion proposal offered by certain hearing instrument specialists (HIS), affiliated trade organizations, hearing aid manufacturers, distributors, and franchisees. This proposal, if enacted, will authorize HIS to perform audiologic diagnostic testing, interpretation, and treatment services, without appropriate training, qualifications, and supervision, putting Nebraskans of all ages at significant risk of financial and physical harm.

The requested scope expansion in the HIS proposal is incongruent with evidence-based practices in the delivery of audiologic care, particularly when evaluated against the licensing and training requirements for similar and related professions. 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 other professionals who are authorized under their licensure to perform some of these services.

Audiologic services, including diagnostic services, cerumen management, tinnitus evaluation and treatment, and aural rehabilitation are complex procedures that require extensive training. The HIS proposal includes a list of proposed educational requirements for licensure that 'grandfather' existing HIS' with no increase in training or improved qualifications and feign enhanced requirements for new HIS, that, upon careful inspection, simply maintain the status quo (must be 21 years of age and have a high school education). In addition, the proposal allows the educational requirements to be changed arbitrarily at the discretion of the Board.

Occupational licensure laws are designed to protect our patients. The HIS proposal will only unfairly protect and further industry players seeking to profit from hearing aid sales. I urge the Hearing Care Technical Review Committee to reject the HIS scope expansion proposal in its entirety.

Thank you for your consideration,

Ruth Farrington AuD, CCC-A  
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