

February 5, 2025

Chairman Brian Hardin
Vice-Chairman John Fredrickson
State Capitol, Room 1510
Lincoln, NE 68508

RE: Oppose LB 154 Hearing Instrument Specialists Scope of Practice Expansion

Dear Chairman Brian Hardin, Vice-Chairman John Fredrickson, and Members of the Committee:

The American Academy of Audiology (“the Academy”) appreciates the opportunity to submit written testimony on LB 154. The Academy is the largest organization of, by, and for audiologists. We are dedicated to the provision of quality hearing and balance care services through professional development, education, research, and increased public awareness of hearing and balance disorders.

We are writing to express our opposition to LB 154, legislation that would expand the scope of practice for Hearing Instrument Specialists (HIS). This bill threatens consumer safety by allowing individuals with insufficient education and training to provide care beyond their expertise, increasing the risk of misdiagnosis and inappropriate treatment. It undermines established professional standards and could lead to lower-quality hearing healthcare for the citizens of Nebraska.

Critical Differences Between Education & Training of Audiologists & HIS

To become a hearing instrument specialist in Nebraska, current requirements stipulate that applicants must be at least 21 years old, possess a high school diploma, and pass a qualifying examination. The proposed changes suggest adding a two-year degree and an unspecified practicum term as new educational requirements. However, this legislation includes provisions that allow these enhanced educational qualifications to be bypassed by applicants who hold a license from another jurisdiction, are certified by the National Board for Certification in Hearing Instrument Sciences at the time of the examination, or possess an advanced credential from the International Hearing Society (IHS) at the time of the examination. It is important to note that both the National Board certification and the advanced credential are managed by the International Hearing Society, which is also one of the entities responsible for submitting the proposal to the Credentialing Review Program at the Nebraska DHHS last year. This creates a potential conflict of interest, as the same organization is both requesting these standards and benefiting from the changes.

In comparison to the HIS, audiologists are doctoral-level professionals who undergo up to four years of rigorous postgraduate education. This includes academic education, clinical training, and a required national exam. Audiologists are qualified to detect underlying medical conditions;

perform cerumen management; and diagnose and treat tinnitus, hyperacusis, vestibular issues, auditory processing disorders, and hearing loss. Audiologists undergo extensive training and work with hundreds of patients before they are allowed to obtain a professional license and perform procedures independently.

Inconsistencies Between IHS's Defined Scope and Proposed Legislation

According to International Hearing Society's website, specialists are defined as allied health professionals with the necessary training, knowledge, and experience to address the amplification needs of individuals with hearing loss. Their primary responsibilities, as outlined by IHS, include administering and interpreting auditory function tests, recommending amplification options, making ear impressions, fitting and dispensing hearing instruments, verifying and validating fittings, counseling on hearing loss, providing aural rehabilitation, and offering post-fitting care, including options for assistive listening devices¹. However, the scope expansion proposed in the Nebraska legislation is not reflected in the duties as stated by IHS. This discrepancy highlights a misalignment between the proposed changes in LB 154 and the established job description set by the professional organization for the Hearing Information Specialists, one of the entities advocating for this change

Further, the National Institute on Deafness and Other Communication Disorders (NIDCD) falls beneath the umbrella of the National Institutes of Health and provides guidance on the types of professionals who provide services to individuals with hearing loss and identifies the appropriate role for each profession. NIDCD provides that "a hearing instrument specialist is a state-licensed professional who conducts basic hearing tests, fits and dispenses hearing aids, and educates individuals and their family members about their hearing loss. The licensure requirement varies among states; most states require completing a 2-year apprenticeship."²

Inadequate Training and Safety Concerns in Tinnitus Care & Cerumen Management

Expanding the scope of practice for the HIS to include tasks such as subjective interpretation of test results, determining cochlear implant candidacy, conducting communication assessments, performing tympanometry, or identifying potential otological conditions is highly problematic. These tasks require specialized clinical expertise that HIS certification does not provide and should remain outside their scope of practice. Additionally, including invasive procedures—such as cerumen removal or tinnitus management—based solely on the completion of a short-term certificate course is both inappropriate and unsafe for Nebraskan patients. Tinnitus care, in particular, requires extensive clinical knowledge that HIS professionals are not trained to provide.

The lack of clear supervision requirements or protocols in LB 154 further exacerbates these concerns, allowing for potential substandard care. The scope of practice for the HIS should be restricted to non-invasive tasks directly related to the fitting and adjustment of hearing aids, ensuring patient safety and maintaining the quality of care Nebraskans deserve.

¹ [Become a Hearing Aid Specialist | IHS Professional Development \(ihsonline.org\)](https://www.ihsonline.org/professional-development/become-a-hearing-aid-specialist/)

² [Who Can I Turn to for Help with My Hearing Loss? | NIDCD \(nih.gov\)](https://www.nidcd.nih.gov/health/who-can-i-turn-to-for-help-with-my-hearing-loss/)

Conclusion

For the reasons outlined herein, the American Academy of Audiology stands in opposition to LB 154. We believe the changes proposed through this legislation are not in the best interest of the health, safety, and welfare of individuals seeking assistance with hearing loss. If you have any questions, please contact Vice President of Government Relations and Policy, Joanne Zurcher, MPP, at jzurcher@audiology.org.

Sincerely,

A handwritten signature in black ink that reads "Patricia Gaffney AuD, MPH". The signature is written in a cursive, flowing style.

Patricia Gaffney, AuD, MPH
President, American Academy of Audiology