



11480 Commerce Park Drive tel 800-AAA-2336  
Suite 220 fax 703-790-8631  
Reston, VA 20191 www.audiology.org

March 7, 2025

The Honorable Elaine Marzola  
2920 North Green Valley Parkway  
Suite 219  
Henderson, NV 89014-0407

**Submitted Via Email: [Elaine.Marzola@asm.state.nv.us](mailto:Elaine.Marzola@asm.state.nv.us)**

**RE: Oppose Hearing Instrument Specialists Scope of Practice Expansion**

Dear Chairwoman Marzola,

The American Academy of Audiology appreciates the opportunity to provide our feedback on Assembly Bill 177. The Academy is the largest organization of, by, and for audiologists. We are dedicated to providing quality hearing and balance care services through professional development, education, research, and increased public awareness of hearing and balance disorders.

On behalf of the Academy, I want to express our strong opposition to AB 177, legislation that would dangerously 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 services beyond their expertise, increasing the risk of inappropriate treatment and lower-quality hearing healthcare for the citizens of Nevada.

To become a hearing instrument specialist in Nevada, the current requirements raise concerns about the depth of training and expertise in the field. Concerningly, individuals can enter this profession with as little as a high school diploma and a brief Board-approved training program. Even those pursuing an associate's degree in hearing instrument sciences can complete their education in just two years. This is an insufficient training period to prepare for dealing with complex auditory health issues,

In comparison, audiologists are doctoral-level professionals who undergo four years of rigorous postgraduate education. This includes academic education, clinical training, and a required national exam. They 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 can obtain a professional license and practice independently.

Expanding the scope of practice for HIS to include invasive and complex 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 patients. Cerumen removal requires

straining in the anatomy and physiology of the ear canal, pathologies of the ear, and visual inspection techniques. The procedure requires extensive experience using metal curettes, stainless steel alligator forceps, irrigation equipment, and/or suctioning equipment. Current educational and training requirements for HIS do not typically include cerumen management. Allowing this procedure to be performed by individuals without proper training puts the patient at an increased risk of sustaining harm.

Tinnitus care, in particular, requires extensive clinical knowledge for audiologists in partnership with a patient's physician and mental health professionals. The Mayo Clinic estimates that tinnitus affects about 15% to 20% of Americans and is especially common in older adults<sup>1</sup>. Tinnitus is when a patient experiences ringing or other noises in one or both ears. Tinnitus is usually caused by an underlying condition, such as hearing loss, an ear injury or a problem with the circulatory system. Tinnitus management is a complex balance between audiology testing, counseling, and listening device selection. HIS professionals do not have the requisite training to care for tinnitus patients.

The proposed expansion of the scope of practice for Hearing Instrument Specialists (HIS) in Nevada lacks support from the current education and training standards for these professionals. The expertise required for these specialized services cannot be achieved through short-term education. Allowing HIS to include cerumen management and tinnitus within their scope of practice would not serve the best interests of Nevada's citizens, as it compromises the health, safety, and welfare of individuals seeking assistance with hearing loss. For these reasons, the Academy strongly urges the removal of the language authorizing HIS to perform these services. For further information, please contact Vice President of Government Relations and Policy, Joanne Zurcher, MPP, at [jzurcher@audiology.org](mailto:jzurcher@audiology.org).

Sincerely,

A handwritten signature in black ink that reads "Patricia Gaffney AuD, MPH". The signature is fluid and cursive, with the first name "Patricia" being the most prominent.

Patricia Gaffney, AuD, MPH

President, American Academy of Audiology

cc: Assemblymember Cecilia Gonzolez

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<sup>1</sup> Mayo Clinic, *Tinnitus - Symptoms and Causes*, Mayo Clinic, August 31, 2023, <https://www.mayoclinic.org/diseases-conditions/tinnitus/symptoms-causes/syc-20350156>.