



July 29, 2024

Jennifer R. Pierce, Executive Director  
Nevada Speech-Language Pathology, Audiology & Hearing Aid Dispensing Board  
61070 Mae Anne Ave., Suite 1  
Reno, NV 89523

**RE: Inclusion of Cerumen Management and Tinnitus Care Under NRS 637B.055**

Dear Ms. Pierce and Members of the Speech-Language Pathology, Audiology & Hearing Aid Dispensing Board:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to oppose the inclusion of cerumen management and tinnitus care under the practice of fitting and dispensing hearing aids (NRS 637B.055), which would broadly expand the scope of practice for licensed hearing aid specialists. This expansion would be inconsistent with specialists' education and training.

ASHA is the national professional, scientific, and credentialing association for 234,000 members, certificate holders, and affiliates who are audiologists; speech-language pathologists (SLPs); speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students. Over 1,000 ASHA members reside in Nevada.<sup>1</sup>

ASHA is dedicated to expanding consumer access to hearing health services, including hearing aids and other wearable instruments that help minimize the effects of hearing loss. For instance, we have supported the new category for over-the-counter hearing aids by the U.S. Food and Drug Administration, mandating insurance coverage for hearing services and devices, and expanding routine hearing screenings by trained providers. We also advocate for reducing unnecessary licensing barriers to hearing health services, such as provider referral requirements and restrictions on telehealth.

As part of our commitment to improving access to hearing health care, ASHA acknowledges the role of hearing aid specialists in the fitting and selling of devices to help address hearing needs. In Nevada and other states, the statutory scope of hearing aid specialists is limited to measuring hearing solely for making selections, adaptations, or sales of hearing instruments. However, the proposal before the advisory committee would expand hearing aid specialists' scope of practice well beyond their education and training.

**Understanding the Implications of Proposed Changes**

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Under the proposed changes, hearing aid specialists in Nevada would be permitted to provide cerumen management and tinnitus care. These duties are inconsistent with the education and training of hearing aid specialists. Specialists are trained only to perform tests in order to select, adapt, or sell hearing devices or to refer patients for medical management. Moreover, hearing aid specialists do not receive educational coursework on cerumen management or tinnitus care, which is proposed to be added to their scope. ASHA recognizes that the proposal specifies that specialists may only perform cerumen management and tinnitus care if they receive additional training and certification. However, we do not believe this requirement ensures the appropriate skills to conduct these services.

**If the proposed scope of practice expansion were to be enacted, ASHA maintains it would be detrimental to the health of Nevadans seeking skilled services to address problems with their hearing health.** The implications include:

- Inappropriate treatment of cerumen resulting in puncturing an eardrum and damage to the ear canal, all of which could lead to additional hearing loss and the need for medical management
- Poor tinnitus management due to a lack of education and training
- Misdiagnosis of a hearing condition to the detriment of the consumer and undiagnosed underlying conditions causing hearing problems.

### **Comparing the Qualifications for Audiologists and Hearing Aid Specialists**

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The competencies included in the proposed scope of practice expansion encompass the education and training of audiologists but not hearing aid specialists. The minimum education requirement to obtain a hearing aid specialist license in Nevada is a high school diploma or equivalent, along with completion of a hearing aid training program. In contrast, audiologists hold a doctoral degree in audiology. This education includes extensive foundational education for anatomy/physiology, research applications into practice, 1,600+ hours of clinical experience, and training to treat complex conditions, including cerumen management. An audiologist completes seven to eight years of schooling between undergraduate and graduate programs to ensure an educational foundation for the best care to meet patients' needs. Audiologists who obtain the ASHA Certificate of Clinical Competence in Audiology (CCC-A) must complete ongoing professional development, including at least 30 hours of professional development every three years.

Thank you for considering ASHA's position on the inclusion of cerumen management and tinnitus care in the practice of fitting and dispensing hearing aids. If you or members of the board have any questions, please contact Tim Boyd, ASHA's director of state health care and education affairs, at [tboyd@asha.org](mailto:tboyd@asha.org).

Sincerely,



Tena L. McNamara, AuD, CCC-A/SLP  
2024 ASHA President

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<sup>1</sup> American Speech-Language-Hearing Association. (2023). *Nevada* [Quick Facts]. <https://www.asha.org/siteassets/advocacy/state-fliers/nevada-state-flyer.pdf>