



10 March 2022

Jodie Yorke
Program Lead, Provider Regulation and Support
ReturnToWorkSA
400 King William Street
Adelaide SA 5000

Email: providers@rtwsa.com

Dear Ms Yorke

Re: Proposed Audiology Fee Schedule for 2022-23

Audiology Australia (AudA) welcomes the opportunity to provide a response to ReturnToWorkSA (RTWSA) on the Audiology Fee Schedule for 2022-23, which will come into effect on 1 July 2022.

We acknowledge and welcome RTWSA's proposed 3.8% increase to audiology consultation fees, noting that this increase does not apply to hearing devices (referred to by RTWSA as appliances). In addition, we support RTWSA's expansion of telehealth access to all workers and not just those who have been impacted by COVID-19. We strongly recommend that access to telehealth services be made a permanent feature of the scheme so that hearing providers can provide more accessible audiology services via telehealth, when it is clinically appropriate.

As noted in AudA's 2021 submission to RTWSA, we continue to recommend RTWSA utilise the Australian Government's Hearing Services Program (HSP) as the preferred data source by which to calculate the average charge to private patients for RTWSA's Audiology Fee Schedule.

We understand Medicare data is utilised by RTWSA. However, the audiology services offered under RTWSA - such as hearing assessments, the fitting of hearing aids, aural rehabilitation and hearing aid battery provision and repairs - are not services that are offered under the Medicare Benefits Schedule (MBS).

As there is no direct comparator in the MBS for the audiology services offered by hearing providers under the South Australian Return to Work scheme, this reduces the accuracy of your modelling and impacts access for injured workers. We argue strongly that drawing on more comparable data from the HSP is the only suitable approach. The HSP reflects a much wider array of audiology services that hearing providers are able to deliver when compared to the MBS and is more closely aligned with and comparable to the services offered under the South Australian Return to Work scheme.

The HSP Schedule of Fees for 2021-22 can be viewed [here](#).

Additionally, we recommend the appliance/device limit be indexed annually so that it continues to provide for quality hearing devices into the future. This would prevent the need to renegotiate another hard cap in the future when the limit becomes insufficient. There have been increases to wholesale costings of hearing devices recently which will impact which devices workers can access. RTWSA should consider reviewing the Fee Schedule for appliance costings to account for increased costs arising from the Covid-19 pandemic and inflation. Another consideration is to allow clients to access hearing aid technology beyond the cap limit via an exceptions process and/or self-funding. This may better support clients' hearing health needs by increasing accessibility to available hearing products and devices.

AudA also recommends that tinnitus be included as a separate item on the Fee Schedule. We note that there are products and therapies provided by audiologists designed to assist people who experience chronic and distressing tinnitus as a consequence of workplace injury. While the fitting of hearing aids may alleviate tinnitus, many therapies and devices which specifically address tinnitus differ from those for general hearing loss and should be separated. Adding an additional item would allow RTWSA to contrast claims and audiological interventions for tinnitus from those for general hearing loss.

Lastly, we argue that RTWSA should recognise the potential role, function, and benefit of implantable technology in situations when hearing aids alone cannot address the impact of workplace hearing injuries or when they are not the most appropriate treatment option for people with hearing and communication difficulties. With improvements in technology and surgical techniques, implantable technology is now recognised as an acceptable treatment option for a more diverse group of people with varying degrees/configurations of hearing loss. This may include people with steeply sloping, noise induced hearing loss and/or hearing losses acquired due to a workplace accident.

We welcome the opportunity to discuss any aspect of our letter with you further. I can be contacted via Elissa Campbell, Acting Chief Executive Officer on (03) 9940 3900 or Elissa.Campbell@audiology.asn.au.

Yours sincerely



Dr Barbra Timmer
President