

20 May 2019

Mr Tony Lloyd  
A/g Director  
Hearing Policy Section  
Hearing and Disability Interface Branch  
Department of Health

By email: [hearing@health.gov.au](mailto:hearing@health.gov.au)

Dear Mr Lloyd

Audiology Australia (AudA) is the membership association for the profession of audiology and has over 2,800 members practising across Australia.

We welcome the opportunity to comment on the exposure drafts of the *Hearing Services Program (Voucher) Instrument 2019* (Voucher Instrument) and *Hearing Services (Declared Hearing Services) Determination 2019* (Declared Hearing Services Determination) that are the result of the Department of Health's 2018 thematic review of the Hearing Services Program's (HSP) legislative instruments prior to their sunseting on 1 October 2019. The proposed changes have also been informed by the mpconsulting report (Consultant's Report).

As a general comment, AudA strongly supports the Department's intention to simplify and consolidate the HSP legislative rules with the aim of making them clearer and more user friendly by removing outdated provisions and unnecessary repetition. We also support the intention of easing the administrative burden for both clinicians and clients.

However, we are concerned that the exposure draft legislation does not address a key issue with the HSP scheme – that is, it is a government scheme that is focused on using a medical model to address a person's hearing needs for what is fundamentally a social and communication problem.

For instance, section 41 of the Voucher Instrument highlights this mismatch between rehabilitation services and medical intervention. Section 41 establishes processes for the measurement of hearing loss but there is no equal focus on enabling clinicians to undertake best practice hearing rehabilitation and helping clients to address their communication and hearing needs.

We urge the Department to take this important point into account when considering these current and any other future reforms to the HSP.

Based on member feedback, we have also made detailed comments on both the Voucher Instrument and the Declared Hearing Services Determination in the attached document.

If you wish to discuss any aspect of this submission further, I can be contacted via the AudA Research and Policy Manager Elissa Campbell at [elissa.campbell@audiology.asn.au](mailto:elissa.campbell@audiology.asn.au).

Yours sincerely



Dr Jessica Vitkovic  
President