

19 July 2019

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

By email: hearing@health.gov.au

Dear Mr Lloyd

Audiology Australia (AudA) welcomes the opportunity to respond to the proposed Service Provider Contract (the Contract) that is being developed to align with the new *Hearing Services Program (Voucher) Instrument* and is due to take effect on 1 October 2019.

As the Contract establishes the requirements under which contracted service providers (CSPs) are required to deliver the Hearing Service Program (HSP) to eligible clients, we strongly support its consolidation and simplification to help improve its usability and accessibility for users. We also are pleased to see that there will be a transition period through to 1 January 2020 to enable CSPs to update their procedures to comply with the new arrangements.

Provider Personnel – Clause 8

We welcome and support new material in Clause 8 of the Contract to reinforce that provisional practitioners must be supervised in accordance with Practitioner Professional Bodies' requirements, including those of AudA and that providers cannot request QP numbers for provisional practitioners given only qualified practitioners are entitled to receive a QP number under the HSP.

Professional indemnity insurance – Clause 23, Schedule A

Clause 23 covers professional indemnity insurance for CSPs. Currently, CSPs must hold separate insurance for each practitioner but, in the new Contract, CSPs will be required to have one professional indemnity insurance policy that covers all practitioners – both qualified and provisional - delivering services to HSP clients. The professional indemnity insurance level will also increase from \$1 million to \$10 million.

The Department has indicated that this requirement is being amended to make it easier for providers to ensure that all practitioners delivering services to HSP clients are covered by professional indemnity insurance.

We also understand that the increase in minimum required professional indemnity insurance policy in the Contract is because the Department has established minimum levels for insurance where providers are delivering health services.

As some CSPs are unclear about the reason for this change, we suggest that providing further information and clarification about this alteration would be helpful.

Standards – Item B, Schedule A

Item B, Schedule A is intended to identify additional standards that CSPs and practitioners are meant to follow but nothing is currently listed here. We would welcome further information about whether the Department intends to include any standards here and what those standards will be.

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

Yours sincerely

A handwritten signature in black ink, appearing to read "Jessica Vitkovic".

Dr Jessica Vitkovic
President