

The mission of Independent Audiologists Australia is to promote and support clinical practices owned by audiologists.



Committee Secretariat  
Joint Standing Committee on the National Disability Insurance Scheme  
PO Box 6100  
Parliament House  
Canberra ACT 2600

6 September 2019

Dear Committee Members

### **Joint Standing Committee on the National Disability Insurance Scheme – NDIS Planners**

Thank you for the opportunity to provide input to the current inquiry into the role of planners in the National Disability Insurance Scheme (NDIS).

Independent Audiologists Australia Inc (IAA) is a not for profit incorporated association whose members are university qualified audiologists who hold a financial interest in an audiology practice. As such, our members are both contracted hearing services providers and qualified practitioners (audiologists) under the Hearing Services Program (HSP) and deliver services to NDIS participants as part of the HSP voucher scheme, as well as through the provision of assistive listening devices. Our members employ and/or are in partnership or in other business arrangements with audiologists, audiometrists, medical specialists (such as ENT specialists, neurologists and paediatricians), business managers and others. Our members operate more than 400 clinic sites across Australia and are signatories to our code of ethics and practice standards that require, amongst other things, transparency in billing and transparent handling of interests that potentially conflict. Audiologists provide support services to those of all ages affected by the full range of auditory and vestibular (hearing and balance) conditions – be they related to sensory impairment, processing, cognition, or language as stand-alone conditions or co-morbid with others such as Autism. Support, appropriate training, and counselling are provided as (re)habilitation to both individuals and their significant others, all of whom are impacted when hearing and balance conditions are present in the family or community.

Our members are faced with challenges when working with the NDIS that manifest in planning. Information that guides NDIS policy and information planners provide to participants frequently reflect poor understanding of the scope of audiological practice.

Decisions related to the implementation of the NDIS currently confuse planners and consequently the advice provided to participants is on occasion inappropriate, not best practice, or neglectful of available and necessary supports. Eligibility criteria for participants and NDIS providers and adoption of the Hearing Services Program voucher scheme by the NDIS contribute to misunderstanding by planners.

Confusing and contested **eligibility criteria** for NDIS participants with hearing loss have led planners to miss opportunities to provide reasonable and necessary supports for those with functional needs. Eligibility criteria have been queried (at least once successfully in court) but the perception of the public and of planners appears to be that only those with a severe hearing impairment will receive funding for supports from the NDIS. Planners need to be trained so that they understand that NDIS eligibility criteria ensure that those with severe impairment are automatically accepted into the NDIS as participants, but that existing eligibility criteria do not exclude those who, although without prescribed impairment levels, nonetheless are eligible for the NDIS because of their demonstrated functional need.

Audiologists may not register with the NDIS as **hearing service providers** at this stage. Consequently, NDIS planners do not recognise the skills and services that *audiologists* can offer to participants. Lack of awareness of the scope of professions in the disability field has led, on occasion, to inappropriate suggestions by planners to audiologists. Planners have been seen to allocate funding inappropriately, making accessing the funds for supports over and above the hearing services voucher scheme very difficult for participants. Specifically, funding may be put into Daily Living, but not into Core Supports for additional assistive technology not covered by the voucher scheme (for example smoke alarms, alerting devices, FM and Bluetooth accessories) that are essential supports for those living with hearing loss.

The NDIS has adopted the **Hearing Services Program (HSP) voucher scheme** set up for eligible pensioners for the supply of hearing devices to NDIS participants. Planners often mistakenly or inappropriately insist that all NDIS participants can only be attended to by Hearing Australia. NDIS participants have been told by some planners that they are eligible for specialist services at Hearing Australia, the only agency currently allocated block funding to serve the needs of those whose needs are deemed “complex”. However, this is often not the case. Hearing Australia provides funded services to those who are “complex” according to a set of criteria that relate to impairment (sensory and cognitive) whereas the NDIS criteria relate to functional need. Some NDIS participants are denied choice of provider by being directed to Hearing Australia whereas in fact, participants can use their voucher with any contracted hearing services provider working with the voucher scheme. Further, where services are reasonable and necessary, but are only provided by audiologists outside of Hearing Australia, planners tend to question the validity of those services. For example, children with Autism & other syndromes, who have fluctuating hearing due to middle ear disease will require regular audiological monitoring as part of their support plan. They may also require devices and supports to assist their auditory development and processing. Such services for children are not within the scope of Hearing Australia but are regularly provided by independent audiologists. NDIS planners do not always know what a valid, common or necessary audiological service is, confusing what is offered by Hearing Australia with audiological practice. Thus, commonly mainstream audiological recommendations are queried by some planners for their evidence base.

It should be made clear to NDIS planners and their likes that Hearing Australia’s clinical protocols are not the only valid and evidence-based protocols available for the best practice of audiology.

**Planners** do not appear to have mandatory or minimum qualifications. Some planners divulge a disability or having a child with a disability as their qualifications to be planners. Consequently, planners who rely mainly on their own personal experience or that of their own children may well be unaware of specialist services provided by audiologists. Lack of knowledge by planners is further exacerbated by both them and NDIS participants not being able to find qualified audiologists listed as hearing services providers under the NDIS, because audiologists may not register with the NDIS (see above). Instead of plans that are focussed on what is best for a particular participant, plans appear to be based on what planners are familiar with, resulting from their personal experience.


Training for NDIS planners is required to build a better understanding of the supports needed and available to participants with hearing and balance loss. Training is also required in the funding and service delivery models that operate in the public and private sectors for children and adults.

Training for planners should be provided by those with no vested interest in recommendations and plans. Hearing Australia, even though a government agency, should not be relied upon for training or marketing their services to NDIS planners, because Hearing Australia operates in direct competition with other contracted hearing service providers. Training would best be provided by tertiary educational institutions that train allied health professionals. If that is not possible, then training by planners needs to be provided from multiple sources.

IAA would be pleased to contribute to the training of planners as well as to provide any supplementary information to the NDIS inquiry regarding the delivery of hearing services to NDIS participants.

Thank you again for the opportunity to comment on planners and the workings of the NDIS.

Kind regards  
The IAA Executive Committee



Dr Louise Collingridge (CEO)




Grant Collins  
(President)



Dr Tegan Keogh  
(Vice President)



Dr Celene McNeill



Mel Gray Thompson



Philippa Long



Dr Matthew Callaway



Elaine Melville



Wesley Ong



Dr Ross Dineen