



Summary of Consultation Feedback

Invitation to comment on the draft Service Delivery Framework (May 2016)

A public consultation process has been undertaken on two key documents in the Service Delivery Framework the Quality Principles for Hearing Care and the National Practice Standards for Hearing Care Practitioners. The consultation was open for three weeks and interested stakeholders were invited to provide feedback by 31 May 2016.

The framework also includes a Scope of practice and Code of Conduct.

The Scope of Practice document is currently in development and therefore was unavailable for review by stakeholders at the time of consultation on the Practice Standards/Quality Principles. A common Code of Conduct, based on the National Code of Conduct for Health Care Workers, was enacted on 1 July 2016 and is available on the Practitioner Professional Bodies websites. For this reason (and others, as noted in the summary below) a number of stakeholders suggested that further consultation on the Quality Principles and Practice Standard may be needed.

This document summarises the feedback received through the consultation process.

Submissions

A total of 22 submissions were received from a range of stakeholders including professional associations/bodies, advocacy groups (representing children and adults), hearing service providers, disability service providers and community members.

Although a consultation form and discussion questions were provided, the majority of stakeholders structured their feedback in other ways. As such, the summary of feedback below is organised into key themes arising from the submissions.

Broad level support for the Service Delivery Framework

The submissions indicated broad level support for development of a Service Delivery Framework for Hearing Services. It was acknowledged that the Service Delivery Framework is being developed at a complex and challenging time within the hearing sector given the transition to the National Disability Insurance Scheme (NDIS) and a contestable environment (including the potential ownership options for Australian Hearing). The potential risks these changes pose for individuals and families using hearing services were highlighted and respondents recognised the important role a Service Delivery Framework could have in shaping practice in hearing services in this context.

Implementation and governance arrangements

Despite in-principle support for the Framework, many stakeholders requested more detail regarding governance and implementation arrangements for the Framework. They noted that it was difficult to provide comprehensive feedback until these arrangements were determined. Specifically, more information was requested about the following

- Ownership of the documents and what organisation is responsible for reviewing them
- The integration of these documents with other existing frameworks/documents (e.g. scope of practice and clinical guidelines)

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- How compliance as set out in the Practice Standards and Quality Principles will be monitored and assessed, outside of contractual agreements
- What complaints processes would be established

Scope of Practice

Several stakeholders suggested that the finalised Scope of Practice document should be made available before full feedback could be given on the Quality Principles and/or the National Practice Standards documents. A number of responses focused on issues related to Scope of Practice in particular the need to clearly outline the differences between audiometrists and audiologists.

Vulnerable client groups

A number of responses suggested that while the both the Quality Principles and the National Practice Standards set out the minimum requirements for the delivery of general hearing care services, they required more detail to address the specific concerns of vulnerable client groups, particularly children and their families, Aboriginal and Torres Strait Islander people and those from rural and remote areas. The following comments were made

- Additional standards for paediatric services are required, particularly with regards to the expertise of the provider, information provision, provision of devices, outcome measurement and compliance issues
- The interpretation of the proposed principles and indicators is broad in regard to safeguards for children and their families
- The current protections for vulnerable groups provided under the Australian Hearing Community Service Obligations program are not reflected in the draft Quality Principles and/or National Practice Standards.

Client Outcomes

A number of stakeholders commented that the Quality Principles and the National Practice Standards over emphasised on the prescription of hearing devices (i.e. that the focus was on the Voucher Scheme) and that a stronger client outcomes focus was needed to ensure the documents were in line with the NDIS requirements. The following suggestions were made

- A broader range of outcomes (and options to achieve these outcomes) should be explored
- More flexibility in service options
- A stronger focus on a multi-disciplinary approach is required including rehabilitation, counselling and support
- Clearer referral pathways between professions
- Outcomes evaluated and include collection of consistent data and independent analysis
- Outcomes assessed using common tools that enable benchmarking and reporting, and that are publicly reported to enable transparency around provider performance (for clients, the Hearing Services Program and NDIS).

Terminology

A range of suggestions were provided relating to the terms, definitions and language used in both documents. The majority of these responses focused on the terms 'Hearing Care Practitioner' and 'Hearing Care Services'. Comments about the use of these terms included the differences in training, scope of practice and qualifications between audiologists and audiometrists, and the range of services available through audiologists, audiometrists,

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and the professionals who are associated with achieving hearing outcomes (including rehabilitation counsellors and other related professionals).

Commissions

The majority of stakeholders raised the issue of the commercial nature of hearing device distribution in Australia, and suggested the need for that the Quality Principles and the Practice Standards to provide sufficient protection for individuals (and their families).

Strong support was expressed for setting a more explicit standard for informing the public about commissions and sales targets within the Quality Principles and the Practice Standards. Respondents also suggested that the Standards should emphasise that information provided to individuals about their options to be impartial and unbiased.

Structure and layout of the Documents

Opinion was divided regarding how easy to follow the content and structure of the Quality Principles and National Practice Standards were. Some commented the documents were easy to follow and the indicators set out clear expectations. Others commented that the multiple layers to the Service Delivery Framework could lead to confusion, particularly as not all of the documents outlined in the Framework were available for review during the consultation period.

It was suggested by some to provide more clarity about the relationship between the different elements of the Service Delivery Framework, further to the illustrated pyramid diagram.

Registration of audiologists

A small number of stakeholders raised the issue of registration for audiologists with the Australian Health Practitioner Regulation Agency (AHPRA). These respondents argued that registration under AHPRA provided more safeguards for individuals using hearing services than the proposed Service Delivery Framework.

Consultation process

Some stakeholders commented that the public consultation process for providing comment on these documents was not adequate due to lack of time, access and broader promotion to the documents.

It was suggested that the consultation process be extended and particular consideration given to ensuring better representation of consumers in the process.