

The provision of hearing services under the National Disability Insurance Scheme (NDIS)



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Joint Standing Committee on the NDIS – Hearing Services

Terms of Reference

1. That the joint committee inquire into and report on the provision of hearing services under the National Disability Insurance Scheme (NDIS), with particular reference to:
 - a. the eligibility criteria for determining access to, and service needs of, deaf and hearing impaired people under the NDIS;
 - b. delays in receiving services, with particular emphasis on early intervention services;
 - c. the adequacy of funding for hearing services under the NDIS;
 - d. the accessibility of hearing services, including in rural and remote areas;
 - e. the principle of choice of hearing service provider;
 - f. the liaison with key stakeholders in the design of NDIS hearing services, particularly in the development of reference packages;
 - g. investment in research and innovation in hearing services; and
 - h. any other related matters.

That the committee reports by 23 March.

Introducing SHHH Australia Inc.

SHHH Australia Inc (Self Help for Hard of Hearing People) is a voluntary, non-profit educational organisation dedicated to helping Australians with hearing loss and whose primary method of communication is through speech. It was founded in 1983 in NSW by a person named Mary Sparke who herself was hearing impaired and felt strongly that people with hearing impairment needed more than lip reading and hearing aids.

SHHH has since grown and expanded, and now provides information and advice to people with hearing impairment and their families, while promoting community understanding about hearing impairment. SHHH believes that knowledge is essential to managing hearing impairment and as its name suggests, its aim is to assist each person with hearing impairment to make informed decisions about the best options for their own hearing management.

Hearing impairment can lead to increasing isolation and difficulties in family, social and workplace situations. However, this is not inevitable. People with hearing impairment can help themselves and also work towards educating the community at large about hearing loss and how to manage it better.

SHHH Australia Inc., as a self-help organisation for people with hearing impairment seeks to:

- educate people with hearing impairment, their families and friends, and the community at large on the nature and complications of hearing impairment and ways of coping with it.
- assist people with hearing impairment to integrate into all aspects of society.
- publish and distribute a regular journal and other information materials to assist all those with an interest in hearing impairment and to raise public awareness of hearing impairment.
- encourage and support groups where people with hearing impairment, relatives and friends can come together in empathy and concern based on common experience.
- represent and advocate for the interests of people with hearing impairment on matters pertaining to hearing and hearing impairment.
- promote the welfare of people with hearing impairment and, where appropriate, co-operate with other related organisations.

SHHH Australia Inc. thanks the Committee for the opportunity to comment on the Terms of Reference for this Inquiry.

a) the eligibility criteria for determining access to, and service needs of, deaf and hearing impaired people under the NDIS

While SHHH understands that eligibility criteria for determining access to the NDIS is based on the functional limitations experienced as a result of a permanent and severe disability, there appears considerable confusion in the community as to how that applies to people with hearing impairment.

At least a part of that confusion in the community is in response to the fact that hearing levels are often described by hearing health professionals in one of four categories: profound; severe; moderate or; mild hearing loss. The NDIS might take care to ensure that any specific messaging that is provided around eligibility criteria for the hearing impaired community provides clarity in ensuring the distinction between a 'severe hearing loss' (determined by a hearing health professional) and a 'severe and permanent disability' as determined by the NDIS access team may not be one and the same.

The release of a position statement regarding the criteria for specific eligibility criteria for the hearing impaired community would be welcomed. As with other disabilities, potential participants of the NDIS are reporting that they are delaying their purchase of aids and other assistive technologies until they receive clarity around eligibility decision from the NDIS. SHHH understands that that situation is not in the interests of the person with hearing impairment or the broader community generally.

b) delays in receiving services, with particular emphasis on early intervention services

SHHH is aware that the NDIS determines that 'early intervention' services relate to services provided to children between the ages of 0 and 7 years of age and believes that other organisations in the sector may be better placed to comment in this area but offers one observation.

As an organisation that supports adults with hearing impairment, some of whom have experienced a sudden and sometimes significant hearing impairment, the ability of the NDIS to respond rapidly to those people in crisis is an important consideration. Immediate assessment,

fitting of aids, access to assistive technologies and rehabilitation services can make a significant difference to not only the long term costs to the individual and the healthcare system but the ability of the person to continue their role in the community as soon as practicable. While SHHH understands that the medical elements of that part are not covered by the NDIS, some parts of the process will be relevant to the NDIS and a seamless approach for the eligible participant would be welcomed.

c) the adequacy of funding for hearing services under the NDIS

For many members of SHHH that have not previously been eligible to access the Australian Government Hearing Services Program, they welcome the opportunity to gain access to the NDIS. SHHH members have an expectation and hope that they will be able to access support not only in funding for the necessary aids but also assistive technology devices and rehabilitation services in a *competitive* market place.

Adults who have hearing services approved within their NDIS plan are currently at risk of being provided with a limited choice of aids and assistive technologies by being directed towards the Government Hearing Service Program.

SHHH is aware that members have chosen to purchase higher end models to ensure that all available functionality was accessible to them. They have chosen those models to maximise their communication successes, to support their opportunities in education & employment and to ensure a robust approach to their assistive technology requirements. Those potential participants of the NDIS should not have their choice of aids or technologies limited by a structure (the Government Hearing Service Program) that does not currently support participants of working age with no confounding disabilities and therefore has little current market knowledge of those member's needs.

Perhaps the most important comment that SHHH can make in response to this terms of reference is this: There is clearly a large gap in the marketplace in the provision of rehabilitation services to people with hearing impairment. There are few if any professional (although some voluntary run) organisations in which one can access speech reading classes, assistive technology information points or, professional advocacy support for people with hearing impairment. SHHH would welcome any funding provided for rehabilitation of people with hearing

impairment, with a view to encouraging the development of a professional market around this need that is not currently met.

SHHH is also aware that in the current market many audiologists bundle the cost of aids with rehabilitation services and then may or may not provide those rehabilitation services as paid for. SHHH would encourage the NDIS to shine a light on the sector and provide funding for individual parts of the process; including the purchase of aids, the provision of specific rehabilitation services, the delivery of advice and information on assistive technologies and provide the hearing health professionals with funding for the delivery of all parts of their services and the participant with the choice and control the Scheme promises.

d) the accessibility of hearing services, including in rural and remote areas

Australian Hearing currently has a significant footprint over many areas of Australia including rural and remote areas. In a competitive marketplace, while Australian Hearing may be required to change its approach to the market it has a distinct advantage in already having a presence in those rural and remote areas, particularly in terms of having developed cross-cultural trust and rapport in the treatment of indigenous clients.

e) the principle of choice of hearing service provider

Given “choice and control” is a key tenant of the NDIS then SHHH does not believe that choice should be removed or limited from participants with hearing impairment. SHHH encourages the NDIS to be bold in its push forward towards market competitiveness as it has done in other areas.

Audiology is a self-regulating profession. There are several professional associations that represent audiologists and audiometrists, but there is no peak registration board or authority that has overarching responsibility for the profession of audiology. This is an area of risk for consumers and needs to be addressed.

Research indicates the expertise of the service provider has a significant impact on client outcomes. Consideration needs to be given to the mechanism that would be used for clinicians to attain the competencies needed to deliver services to clients in the future, and for consumers to be able to easily recognise that practitioners have the skill level required to provide these services.

f) the liaison with key stakeholders in the design of NDIS hearing services, particularly in the development of reference packages

SHHH strongly holds the view that any liaison with stakeholders on the development of reference packages for people with hearing impairment must include representatives who have lived experience of hearing impairment. Without such experience it is difficult to understand the functional limitations that come with hearing impairment and would be a disadvantage in the recommendation of the most appropriate reference packages.

g) investment in research and innovation in hearing services

There are several institutions in Australia that undertake hearing research including the HEARing CRC, the National Acoustic Laboratories, universities, Menzies School of Health, Ear Science Institute to name just a few. SHHH strongly supports the provision of appropriate funding to allow these facilities to continue with their research as it ultimately improves the lives of people with hearing impairment and reduces related health costs.