

08 October 2021

Mr Adam Dent  
Chief Executive  
State Insurance Regulatory Authority  
Level 14/15, 231 Elizabeth Street  
Sydney NSW 2000

Email: [healthpolicyandsupervision@sira.nsw.gov.au](mailto:healthpolicyandsupervision@sira.nsw.gov.au)

Dear Mr Dent

**Re: Workers compensation guidelines for the approval of hearing service providers**

Audiology Australia (AudA) welcomes the opportunity to provide a response to the State Insurance Regulatory Agency's (SIRA) consultation on the Workers compensation guidelines for the approval of hearing service providers. AudA is the member association for the profession of audiology with 824 members in NSW who provide extensive support to and advocacy on behalf of WorkCover clients.

We have reviewed SIRA's Workers compensation guidelines for the approval of hearing service providers and have provided our response to the consultation questions below.

**1. Are the new guidelines fit for purpose and easy to understand?**

AudA considers the new guidelines to be fit for purpose and easy to understand. We also consider the guidelines' definitions of *Audiology entity* and *Hearing service provider* to be appropriate. We have provided the following amendment to the definition of *Audiologist* for consideration below:

**Audiologist:** is a university graduate with tertiary qualifications in audiology who specialises in the assessment, prevention and non-medical management of hearing impairment and associated disorders of communication **and balance**.

**2. Are the approval requirements outlined in Part 2 of the guidelines appropriate and sufficient?**

We note that SIRA requires audiology entities to be accredited service providers contracted under the Commonwealth Hearing Services Program (the Program) in order to be able to provide hearing services and treatments within the NSW workers compensation system. As far as AudA is aware, this requirement does not appear to be mandated by other jurisdictions in Australia. The reason for this requirement is also unclear.

Due to this requirement, we note that should a hearing service provider's accreditation or contract under the Program not be renewed, the hearing service provider will no longer be eligible for SIRA approval.

AudA recognises the importance of ensuring that every WorkCover client receives high-quality hearing services from appropriately qualified hearing service providers. However, we are concerned that this requirement may place a restriction or barrier on audiologists in NSW who are not contracted under the Program but would like to provide hearing services within NSW workers compensation. Also, in circumstances where an audiologist may have forgotten or is experiencing a delay in renewing their Program contract, this requirement may potentially have an adverse impact on their businesses and work opportunities within the NSW workers compensation scheme.

**3. Do you have any other comments or feedback about the guidelines?**

We do not have any further comments or feedback about the guidelines.

We would welcome the opportunity to discuss any aspect of our letter with you further. I can be contacted via [REDACTED] on [REDACTED] or [REDACTED]

Yours sincerely

[REDACTED]

