



Australian Government



Australian
**Small Business and
Family Enterprise**
Ombudsman

23 June 2021

Prof Mike Woods and Dr Zena Burgess
Hearing Review Taskforce Independent Panel
Department of Health

via email: hearing-review@health.gov.au

Dear Prof Woods and Dr Burgess

Hearing Services Program Review - Consultation Paper

We welcome the opportunity to comment on the Hearing Services Program Review draft report. The proposed recommendations will present a significant change to the Hearing Services Program (HSP) and the viability of smaller hearing services providers operating in Australia. We provide the following comments for consideration:

1. The Department of Health should ensure small businesses are consulted on the implementation of draft recommendations and make available small business transitional arrangements. The draft report recommends a fundamental change to the HSP, including new objectives of the program; the provision of counselling services; a rebalancing of the schedule of fees; and a change in the eligibility criteria for patients. Such a significant change in the program may have adverse impacts on small businesses who may not have the resources to adopt significant changes whilst continuing standard business operations.
2. We support the proposal to provide a loading on service items delivered by small or rural/remote service providers. Small hearing service providers located in rural and remote areas often raise concerns of more challenging economic conditions than metropolitan providers. In particular small businesses in rural areas have highlighted increased costs of delivery (i.e. travel and delivery costs) and lack of access to skilled labour. A loading on service items in these areas will go some way to ameliorating some of these additional challenges.
3. In order to maximise the benefit of audits in the HSP we encourage the Department of Health take a proactive approach by prioritising the provision of education rather than punitive measures (i.e. recoupment of fees for services provided). Despite best intentions to comply, small businesses do not have the resources of larger hearing services providers to manage complex regulatory environments. Audit activities should focus on working with small business to identify risk areas and recommend improvements to ensure their compliance.

Thank you for the opportunity to comment. If you would like to discuss this matter further, please contact Mr Paul Buckingham on 02 6243 7821 or at Paul.Buckingham@asbfeo.gov.au.

Yours sincerely

The Hon. Bruce Billson
Australian Small Business and Family Enterprise Ombudsman

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