

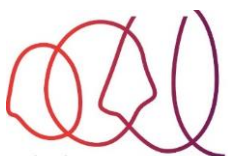
25 March 2020



Australasian Newborn  
Hearing Screening  
Committee



firstvoice



Telethon  
Speech & Hearing



**Senator the Hon Anne Ruston  
Minister for  
Families and Social Services**  
Parliament House  
Canberra

**The Hon Stuart Robert MP  
Minister for the National  
Disability Insurance Scheme**

Dear Ministers

### **COVID-19 AND THE TRANSITION OF PAEDIATRIC HEARING SERVICES TO THE NDIS**

We are writing to raise our concerns about the readiness of the NDIS and the hearing health sector to move to new funding arrangements and to a contestable market for the delivery of hearing services to children on 1 July 2020, particularly during this major health crisis.

It is clear that there is still much to be done to ensure children are able to access quality hearing services under the new arrangements, and it is highly unlikely that the work can be achieved in the time remaining, particularly in the current environment.

The transition of paediatric hearing services from the Hearing Services Program to the NDIS needs to be delayed so that families can give priority to keeping their family safe and well during the coronavirus pandemic.

We ask that you protect the needs of children with hearing loss in these challenging times by extending the current in-kind arrangements with the Hearing Services Program for another two years. This will allow time for the policy framework to be finalised; for the necessary safeguards to be put into place; for consumers, NDIS staff and hearing services providers to be educated on the new arrangements; and time for the country to recover from the COVID-19 pandemic.

The families of children with hearing loss, like all Australians, are anxious about how they will cope with the impact of COVID-19. They are worried about how to keep their family safe, whether they still have a job, whether they will need to put home-schooling arrangements in place, and whether they can access basic grocery items for their family. Having to understand and navigate new arrangements that apply to accessing hearing services for their child is not what families need when they are trying to address critical issues that impact their daily living arrangements.

The evidence to date indicates that the policy departments have not addressed the specific details of how the new arrangements will work and the sector does not have the infrastructure it needs to support a smooth transition of hearing services for children from the Hearing Services Program to the NDIS.

The Department of Social Services released a draft policy framework for the delivery of hearing services under the NDIS in December 2019 and held a two-day workshop in February to work through the details with stakeholders. It was clear from the workshop that there was still a significant amount of work to be done which will not be achieved by 1 July.

At the workshop stakeholders were given conflicting advice from departmental representatives on how the Hearing Services Program and the NDIS will interact in future which demonstrated how much work still needs to occur.

The lack of clarity on the arrangements also undermined the confidence of the consumers that their needs would be met in the near future. It was also clear from the workshop that the representatives from the various departments were unaware of the many operational arrangements that need to be put into place in order to support the principle of no disadvantage as a result of transition. These are fundamental issues that need to be addressed and consumers and providers still have no clarity around the arrangements that families will have to understand and navigate in three months' time. An extensive communication and education plan will be needed to help families understand the new arrangements especially as many families have been given policy advice over the last 12 months on how the two programs work that has since changed. There will be major confusion and high levels of anxiety for some time as families are educated in the new systems. The new arrangements should have been communicated to stakeholders well before now if they are to apply from 1 July 2020. Now, a major communication plan has to be implemented at a time when the key messages that people need to engage with are about dealing with the impact of coronavirus.

One of the key issues still to be resolved is the development of clinical standards and the accreditation of paediatric audiologists. The NDIS Quality and Safeguards Commission relies on the professional associations to set clinical standards and assess competencies. At the workshop Audiology Australia, the major organisation representing audiologists, indicated it would need 18 months to two years to develop the standards and accreditation system and it would require additional funding to undertake that task. If transition occurs on 1 July 2020 it will mean that children with hearing loss will be accessing hearing services in a competitive market without there being a quality framework in place that matches existing arrangements. This has the potential to have an adverse impact on the long-term outcomes for children with hearing loss.

Moving paediatric hearing services to the NDIS now is going to be a high risk activity. There is a risk that:

- it will impact on the long term outcomes of children
- children will fall through the gaps as the single database of all children with hearing loss that is currently held by Hearing Australia will be lost
- families will be unaware that the professional association has not yet developed paediatric standards to guide audiologists on best practice for delivering hearing services to children, so the NDIS Quality and Safeguards Commission framework will not be sufficient to ensure that their child receives an appropriate level of service

- families will access services from a practitioner who does not have appropriate skills as there is no accreditation scheme in place to help families recognise if the practitioner they have chosen has the necessary expertise
- families will miss the information about the changes as they are needing to focus on health advice about COVID 19 which is clearly the priority

Special arrangements have been put into place for current NDIS participants in order to deal with the impact of COVID-19. Deferring the transition of hearing services to the NDIS is a simple, practical solution to maintaining quality hearing care for children with hearing loss during this major health crisis. It would provide certainty for families by ensuring that:

- all families continue to receive consistent, high quality hearing services from a trusted organisation with a highly competent workforce
- services will be available at all existing locations throughout Australia
- reduced risk of losing access to hearing services due to the impact of COVID-19 on the health workforce as a single large provider has the infrastructure to support business continuity

**Ministers, please do not bring further chaos into an already chaotic world by introducing major changes in the delivery of hearing services to a highly vulnerable population.**

Contestability under the NDIS can still proceed for adults with hearing loss on 1 July 2020 if necessary, as there is existing infrastructure to support their needs. There is no known or tested infrastructure to support the same level of hearing services for children outside of Hearing Australia at this time. As far as we are aware, there is no legislative impediment that would prevent the existing arrangements for children from continuing. Therefore, we ask that you extend the existing in-kind arrangements between the Hearing Services Program and the NDIS for children aged 0-26 years for another two years.

We would be happy to meet with you to discuss this matter further. Given the short timeframe before transition is due to take effect, we would appreciate it if you could consider this request urgently.

Sincerely



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*On behalf of*

**ACT Deafness Resource Centre, Aussie Deaf Kids, Australasian Newborn Hearing Screening Committee, Better Hearing Australia (National), Deafness Council Western Australia, Deafness Forum of Australia, First Voice Australasia, Hearing Matters Australia, Parent of Deaf Children, Telethon Speech and Hearing, The Shepherd Centre.**