

13 January 2020

Ms Trisha Garrett
Cancer, Hearing and Program Support
Australian Government Department of Health
GPO Box 9848,
Canberra, ACT 2601

Email: trish.garrett@health.gov.au
Cc : hearing@health.gov.au

Dear Ms Garrett,

Re: Changes in clinical pathways for consumers accessing the Hearing Services Program

I am writing to voice Royal Australian College of General Practitioners (RACGP) concern regarding the recent changes (effective 1st October 2019) to the Hearing Services Program. As you will be aware, the changes remove the requirement for patients to have a general practitioner (GP) sign a medical certificate before accessing the Hearing Services Program.

Whilst we recognise a motivation behind these changes is to speed up access to the Hearing Services Program, general practice is a highly accessible and removing the requirement for a GP visit will expose consumers to a range of unintended risks – for little if any benefit.

Assessment by a GP also allows opportunity to identify treatable and reversible hearing problems, which do not require a hearing aid. This missed opportunity is amplified for those more vulnerable patients, for example, those with dementia and age related conditions, who may also benefit from opportunistic preventive health advice.

The RACGP notes that, the Australian Competition and Consumer Commission (ACCC) 2017 report– *Issues around the sale of hearing aids: Consumer and clinician perspectives*, highlighted a number of salient points about the use of unethical commission-based sales models, pressure tactics, and the up-selling of unnecessary expensive hearing aids to vulnerable consumers.

We have a number of questions and concerns that require careful attention and response, including:

- How will the current changes to the Hearing Services Program be evaluated in terms of the impact on the previous existing pathways, in particular the doctor initiated pathway?
- How will consumers choose an audiologist?
- What is the evidence for GP involvement in patient care leading to delays in accessing the Hearing Services Program? If there is a delay, what is the period of the delay, and how does it affect patient outcomes?
- What was the consultation process prior to this change?
- What safeguards are, or will be, in place to heighten consumer awareness of the business practices of the hearing industry?

I look forward to your response. If you would like to discuss the content of this letter or have any questions, please contact Mr Stephan Groombridge, Manager, eHealth and Quality Care on (03) 8669-0544 or at stephan.groombridge@racgp.org.au.

Yours sincerely



Dr Harry Nespolon
President