Mr Kim Snowball  
AHPRA Review

10 October 2014

Dear Mr Snowball

Thank you for the opportunity to comment on the review of AHPRA. We note that one of the aims of the current review is to consider the implications of registration (or lack thereof) for smaller professions not currently represented in the scheme. Our association promotes and supports clinical practices owned by audiologists. Audiologists are currently not registered professionals under AHPRA and may be considered a small profession with approximately 2000 practicing professionals in Australia.

Audiologists are trained at least to a postgraduate (Master’s degree) level at Australian universities. Audiologists provide diagnostic and rehabilitative services to people of all ages for hearing and balance function and for those with closely related conditions. Audiologists are recognised as providers under Medicare and are funded to provide services by Australian taxpayers.

Hearing and balance disorders affect personal, interpersonal and societal functioning. Hearing loss, whether acquired early or late in life, has an impact on communication, social interaction and academic and vocational achievement – all of which contribute to cognitive functioning. Audiologists are the only healthcare professionals whose training directly focusses on these aspects of hearing loss. Hearing loss, when acquired later in life, has a recognised link to reduced cognitive functioning. Audiologists are important contributors to healthcare teams that work with vulnerable groups including newborns and the elderly.
Many local and international businesses who are directly or indirectly involved in manufacturing hearing devices exploit the current situation that does not require registration to provide hearing related services by promoting hearing devices to the public under the guise of hearing “services”. It is not in the interests of those companies (often owned by hearing device manufactures or closely aligned to them) to disclose that hearing device supply is not equated to audiology. Without mandatory registration of audiologists, the public currently has no protection or way of checking if services promoted to them are provided by a qualified audiologist or not. The public (including consumers and referring medical practitioners) have no way of knowing if the clinic they are referring to will be staffed by qualified audiologists or untrained people. Self-regulating professional associations can only offer jurisdiction over their own members and cannot influence business or clinical practices of those who employ their members. Consumer law is insufficient to protect the public because without mandatory registration for qualified professionals, those businesses do not technically break the law when they set up audiology related businesses without relevant formal qualifications.

At present, audiologists who seek reimbursement from government (Medicare, Department of Veterans Affairs, Office of Hearing Services, and WorkCover) are required to join one of the self-regulating professional associations.

Reasons for the exclusion of audiologists from national registration provided by various bodies to date have included:

1. No state based registration existed prior to 2010 so national registration was not included.
2. The cost of a registration board would be “prohibitive” – although no costs have ever been presented to audiologists to allow them to decide of the actual cost would or would not be prohibitive.
3. Audiologists do not place patients at risk and therefore registration is not necessary.
4. Professional bodies serve the same purpose as registration boards.

Each of the above reasons, apart from the first which is factual, can be disputed.

Our experience, since the introduction of national registration for selected healthcare providers in 2010, is that without mandatory registration for audiologists, the public is placed at risk because qualified, professional audiologists are not distinguishable from unqualified businesses. No self-regulating professional association is equipped to carry out the same role as a registration board.
We support mandatory national registration for all healthcare workers and hope to see a transition to this requirement in the future. We have supported a national code of conduct for unregistered healthcare professionals hoping to open discussions about why it is currently perceived that only some professions require registration under AHPRA, whereas others such as Audiology do not.

Some audiologists are dual qualified healthcare professionals who are well placed to appreciate the difference between functioning under the registration body, and being excluded from that body. The unfortunate consequence of not including all healthcare workers in national registration is the creation (possibly unintended) of a two tiered system of healthcare providers. We strongly urge AHPRA to include all healthcare providers recognised by Medicare under the AHPRA mandatory registration scheme. The current scheme of a single board for each individual profession might be made more cost effective by grouping closely related professions (for example audiologists and speech language pathologists) to fall under a single board.

We trust that your review will be productive in revising the current exclusion of some healthcare providers from national registration.

We would be very happy to meet with you to discuss our proposal further.

Kind regards

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