

Audiology Australia (AudA) is the peak professional body for the health profession of audiology with over 3600 members practising across Australia. We appreciate the opportunity to provide input on the proposed changes to the draft aged care rules. The document defines "allied health profession" as any health profession other than dental, medical, midwifery, and nursing. And states that allied health professionals must be registered with Ahpra. There are many allied health professions who are not registered with Ahpra. How will we ensure they can provide services within the aged care system.

Some Audiology based services are implicitly included under "allied health and therapy" and "therapeutic services for independent living". However, there is no direct mention of audiologists clinical services or hearing services/assessment more generally, which can be critical given the importance of hearing care in aged populations.

Audiology services align well with the broader aged care goals outlined in the document, particularly those related to maintaining independence and communication. Hearing support is critical for reducing social isolation, improving communication abilities, and maintaining cognitive function in older adults.

The absence of specific references to audiological assessments, management of hearing aids, or fitting of assistive listening devices (e.g., hearing aids, personal amplifiers) by audiologists might create challenges for audiologists in defining the scope of their services under aged care programs. The Hearing Services Program does not cover all individuals and those who don't meet the criteria for the HSP may be left without assistance and treatment for ear and hearing conditions.

The draft specifies an importance in maintaining independence, physical and cognitive abilities, which aligns with audiology's role in managing hearing health. However, the lack of clear language about the inclusion of hearing services may lead to uncertainty in how audiologists are reimbursed and recognised under this legislation

It would be beneficial for the Aged Care Rules to explicitly recognise the role of hearing care in supporting these goals, which would align the regulatory framework with best practices in aged care. Additionally, to better represent the audiology profession, it would be beneficial for the Aged Care Rules to include explicit references to audiologists and hearing services in relevant sections and including Audiologists as part of the Allied health definition would align the legislation with the clinical care required for those in aged care.