



DVA Tinnitus Assessment Pathway

Ensuring Veteran Choice, Continuity of Care and Transparency

Policy Brief

Prepared by: Australian College of Audiology Inc HAASA (ACAud)

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Executive Summary

The Australian College of Audiology Inc HAASA (ACAud) seeks clarification regarding a Department of Veterans' Affairs (DVA) referral pathway under which veterans claiming permanent impairment for service-related tinnitus are referred to Hearing Australia for assessment and associated treatment activities.

The purpose of this brief is not to allege misconduct by DVA, Hearing Australia or any individual practitioner. Nor does it suggest that Hearing Australia provides inappropriate clinical care. Rather, it seeks clarification regarding veteran choice, continuity of care, informed consent, transparency and the safeguards that exist when a government-owned hearing service provider is designated within a government-directed assessment pathway.

As a recognised Practitioner Professional Body under the Australian Government Hearing Services Program, ACAud has an interest in ensuring that government-funded hearing care pathways operate transparently, support informed consumer choice, maintain continuity of care and promote equitable access to hearing healthcare services for veterans and the broader community.

The matters raised warrant examination because Hearing Australia occupies a unique position as both a Corporate Commonwealth Entity and a participant in the broader hearing services market. Where a government agency directs veterans to a government-owned provider, it is reasonable to ensure that veterans clearly understand their rights, options and ongoing choices regarding treatment and provider relationships.

Purpose of this Brief

The purpose of this brief is to:

- Clarify the operation of the current DVA tinnitus assessment pathway.
- Better understand the rationale for the use of Hearing Australia within that pathway.

- Seek assurance that veterans are receiving clear information regarding their choices and rights.
- Confirm that continuity of care arrangements are appropriately communicated.
- Ensure that transparency and appropriate safeguards are maintained within a government-directed referral framework.

What this Brief Does Not Allege

This brief does not allege misconduct by DVA, Hearing Australia, individual clinicians or any other organisation.

It does not suggest that Hearing Australia provides inappropriate services, nor does it challenge DVA's authority to require clinical assessment where necessary to support legislative decision-making processes.

Rather, the brief seeks clarification regarding policy design, communication, informed consent, veteran choice and continuity of care.

Background

Veteran Correspondence

Correspondence reviewed by ACAud advised a veteran that DVA was referring them to Hearing Australia for an initial assessment and any required treatment relating to accepted service-related tinnitus.

The correspondence further advised that Hearing Australia provides specialist expertise and treatment and that the costs of treatment deemed necessary would be covered by DVA.

A reasonable veteran reading this correspondence could interpret it as meaning that both assessment and treatment are to occur through Hearing Australia.

Referral Scope

The referral documentation provided to Hearing Australia extends beyond administration of a tinnitus questionnaire and includes a range of clinical activities including:

- Tinnitus Functional Index assessment.
- Pure tone audiometry.
- Tinnitus pitch matching.
- Loudness discomfort level testing.
- Counselling and education.
- Sound therapy.
- Behavioural modification strategies.
- Hearing aid fitting where aidable hearing loss exists.
- Referral for psychological treatment where indicated.
- Neuromonics therapy in specified circumstances.

The pathway therefore encompasses activities that extend beyond a simple impairment assessment and may result in ongoing clinical recommendations or treatment interventions.

Subsequent DVA Clarification

Subsequent correspondence from DVA clarified that:

- Hearing Australia assessment is required for MRCA permanent impairment tinnitus claims.
- Veterans who are already receiving treatment through another provider may continue treatment through DVA's normal tinnitus treatment arrangements.

This clarification is welcomed.

However, it raises the question of whether the original veteran-facing correspondence sufficiently communicated that ongoing treatment could continue through an existing provider where appropriate.

Key Issues

Veteran Choice

Veterans should be provided with clear and transparent information that allows them to understand:

- Which elements of the process are mandatory.
- Which elements involve treatment choices.
- Whether they may continue treatment with an existing provider.
- Whether they may seek treatment through an alternative provider where available.
- How any future treatment decisions may affect their ongoing hearing care arrangements.

Clear communication supports informed decision-making and reduces the risk of misunderstandings regarding assessment requirements and treatment pathways.

Continuity of Care

Many veterans have established relationships with hearing care providers who are already familiar with their hearing history, hearing devices, treatment goals and rehabilitation needs.

Where treatment may continue through existing arrangements, it is important that veterans clearly understand this option and are able to make informed decisions regarding their ongoing care.

Continuity of care is particularly important for veterans living in regional, rural and remote communities where long-standing relationships with local providers may contribute significantly to treatment adherence and rehabilitation outcomes.

Transparency

Public confidence in government-administered programs relies upon transparency, consistency and clear communication.

Where one piece of correspondence may reasonably be interpreted as directing assessment and treatment through a specific provider, while later correspondence clarifies that treatment may continue elsewhere, it is reasonable to ask whether the information provided to veterans could be made clearer.

Governance and Competitive Neutrality Considerations

Hearing Australia occupies a unique position as both a Corporate Commonwealth Entity and a provider of hearing services operating within the broader hearing services market.

This does not create a concern in itself.

However, where a government-directed pathway specifies a government-owned provider, it is reasonable to seek assurance that appropriate transparency, informed consent and competitive neutrality safeguards are in place.

ACAud considers that maintaining public confidence in such arrangements requires clear communication, transparency of purpose and appropriate safeguards to ensure veterans understand their options regarding ongoing care.

Questions for Clarification

The following questions are respectfully submitted for consideration:

1. Is Hearing Australia attendance mandatory for all MRCA permanent impairment tinnitus claims or only for specific assessment purposes?
2. What legislative, policy or operational basis underpins the requirement for Hearing Australia assessment within this pathway?
3. Are veterans clearly advised that treatment may continue through an existing provider where appropriate?
4. Are veterans clearly advised that attendance for assessment purposes does not require transfer of Hearing Services Program records or ongoing care arrangements?
5. What information is provided to veterans regarding continuation of care with existing providers?
6. What safeguards exist before any transfer of care or provider records occurs?
7. Was a provider-neutral assessment model considered during development of the pathway?
8. Were any competitive neutrality, conflict-of-interest or market impact assessments undertaken?

9. Has DVA reviewed whether the current correspondence clearly distinguishes assessment requirements from treatment choices?
10. Are there opportunities to provide veterans with additional written information regarding their options and rights within the pathway?

Recommendations

1. Review veteran-facing correspondence to ensure assessment requirements and treatment options are clearly distinguished.
2. Develop a standard information sheet explaining:
 - the purpose of the Hearing Australia assessment;
 - whether attendance is mandatory;
 - whether treatment may continue through an existing provider;
 - whether attendance affects Hearing Services Program provider arrangements; and
 - how veterans may exercise provider choice where available.
3. Publish guidance for veterans and providers regarding continuation of care arrangements.
4. Review whether additional transparency measures would assist veterans in understanding the pathway.
5. Confirm that appropriate safeguards exist to support informed consent, continuity of care and public confidence in the process.
6. Consult with recognised hearing healthcare stakeholder groups, including Practitioner Professional Bodies, regarding any future changes to tinnitus assessment and treatment pathways.

Closing Statement

ACAud supports high-quality, evidence-based hearing healthcare for veterans and acknowledges the important role played by both the Department of Veterans' Affairs and Hearing Australia in supporting Australian veterans.

The purpose of this brief is not to criticise individual organisations or practitioners, nor to challenge the clinical expertise of Hearing Australia. Rather, it seeks to support transparency, informed consumer choice, continuity of care and confidence in government-funded hearing healthcare pathways.

The central issue is whether veterans are being provided with clear, transparent information that enables informed decisions regarding assessment requirements, treatment options and ongoing care arrangements.

ACAud believes that clarification of these matters would assist veterans, providers and government agencies alike and would further strengthen confidence in the operation of the pathway.

ACAud welcomes the opportunity to engage constructively with DVA and other stakeholders to support veteran-centred hearing healthcare and continuous improvement of service delivery arrangements.

Prepared by

Australian College of Audiology Inc HAASA (ACAud)

A recognised Practitioner Professional Body under the Australian Government Hearing Services Program representing Audiologists, Audiometrists, Hearing Rehabilitation Audiologists, Students and Hearing Healthcare Professionals across Australia.