## Guidance: Providing 'quotes' for hearing aids

22 November 2023

The Ethics Officer had multiple contacts in 2023 about audiologists and audiometrists refusing to provide 'quotes' to clients before they have chosen their provider and hearing device.

This reflects a notable change in the expectations of clients regarding written information about hearing aids, associated services, and costs. Clients are now aware that they have a right to ask for a quote that 'unbundles' the services offered and clearly outlines any government subsidy amount. In addition, they know they have a right to compare potential hearing services and related costs and get second opinions.

This shift in client expectations and behaviour may be due in part to the guidance on the Hearing Services Program (HSP) website on the page 'Hearing devices available under the Hearing Services Program' (1) together with the Australian Competition and Consumer Commission (ACCC) guidance 'Hearing aids and devices— information to help make an informed choice' (2); many clients reference these sources when raising their concerns with the Ethics Officer.

## Thinking beyond legal compliance

It seems not all practitioners are aware of their ethical obligations to provide 'unbundled' quotes. However, behaviour does seem to be improving in response to HSP and ACCC guidance including the 'HSP device quote template' (3).

Some audiologists and audiometrists have told the Ethics Officer and potential clients that they won't provide a quote for comparison purposes since they are only required to provide a quote under the HSP when the client has decided which provider they wish to see and which device they would like to purchase. In addition, some practitioners appear to believe that they only need to provide a quote for the chosen aid, not quotes for a range of devices that may meet the client's needs. Some have also said that they do not provide written price information because clients just want to use it to 'shop around'.

This discussion about providing information regarding the costs of hearing services is fundamentally about ethics and promoting clients' rights to make informed decisions regarding their hearing health.

The comments made by practitioners suggest that the ethical considerations are not well understood and that they consider the provision of quotes as only a matter of compliance with the requirements of a government program or contract law.

## Ethical practice

The Ethics Review Committees' Guidance 'Informed consent: More than just a signature on a piece of paper' (4) unpacks these ethical considerations. It states:

"Audiologists have an obligation to:

- Provide information about the diagnosis or assessment of hearing loss
- Answer questions a client has in a format they will understand
- Provide information about all possible service (including device) options that might meet a client's needs, and the costs associated with each option
- Allow a client sufficient time to make a decision"

A failure to follow this guidance may result in breaches of the Code of Conduct for audiologists and audiometrists, including Standard 4, 'Members must promote the client's right to participate in decisions that affect their hearing health' and Standard 6d, 'When more than one hearing service option may meet the client's needs, members must provide information to the client about the costs of each hearing service option.'.

The HSP and ACCC also promote service and price comparisons by clients. The HSP guidance to clients states that "[clients] can also approach other providers for comparison quotes" (1). The ACCC guidance encourages clients to "Ask the clinician to discuss the range of hearing aids and devices available and what the different prices are." and "Ask for a quote, including the type and cost of any recommended hearing aid." (2).

Some practitioners said they cannot provide 'quotes' for each hearing aid and service option that may meet a client's needs, because their processes and/or software only allows them to raise a 'quote' in the context of a contractual agreement.

In response to software limitations, other practitioners have developed information sheets that describe common product and service offerings, associated costs and any available subsidies, with additional space to explain which ones may suit an individual client's needs and why.

Clients can take this information away, consider it in their own time and use it to compare information from other providers.

Another query relates to the ethical considerations of clients asking for price information without an assessment. Providers may choose to have publicly available price information to assist clients in making informed choices. However, it is also reasonable to refuse to provide a 'quote' without an assessment if the provider considers an assessment is necessary to determine a client's hearing needs and the services that may meet these needs.

## References:

- (1) Department of Health and Aged Care, 4 May 2023. Hearing devices available under the Hearing Services Program. Australian Government. Available at: <a href="https://www.health.gov.au/our-work/hearing-services-program/accessing/devices-available">https://www.health.gov.au/our-work/hearing-services-program/accessing/devices-available</a>, accessed 23 May 2023.
- (2) Australian Competition & Consumer Commission, 2017. Hearing aids and devices— information to help make an informed choice. Available at: <a href="https://www.accc.gov.au/about-us/publications/hearing-aids-and-devices-information-to-help-make-an-informed-choice">https://www.accc.gov.au/about-us/publications/hearing-aids-and-devices-information-to-help-make-an-informed-choice</a>, accessed 23 May 2023.
- (3) Department of Health and Aged Care, 26 April 2023. Hearing Services Program device quote template. Available at: <a href="https://www.health.gov.au/resources/publications/hearing-services-program-device-quote-template?language=en">https://www.health.gov.au/resources/publications/hearing-services-program-device-quote-template?language=en</a>, accessed 23 May 2023.
- (4) Ethics Review Committees, 1 May 2023. Informed consent: More than just a signature on a piece of paper. Available at: <a href="https://auderc.org.au/guidance-for-practitioners/informed-consent-more-than-just-a-signature-on-a-piece-of-paper/">https://auderc.org.au/guidance-for-practitioners/informed-consent-more-than-just-a-signature-on-a-piece-of-paper/</a>, accessed 23 May 2023.