



Dr Tony Coles AudA CEO  
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Dear Tony and Kylie

**SURVEY RESULTS – IAA STAKEHOLDER FEEDBACK ON PROPOSED MERGER BETWEEN  
AUDIOLOGY AUSTRALIA AND THE AUSTRALIAN COLLEGE OF AUDIOLOGY**

Audiology Australia (AudA) sought industry stakeholder feedback on their proposed merger with the Australian College of Audiology (ACAud) in a letter dated 29 March 2019. In response, Independent Audiologists Australia (IAA) surveyed its full members to establish what views are held on the proposed merger. Many IAA members will be attending the AudA and ACAud meetings in the coming week, where the proposed merger will be presented and discussed. Several of IAA members asked to see the survey results. This report, prepared in response to your letter, has been shared with all IAA members.

**Survey responses**

55 full members of IAA completed our survey, a return rate of 50%, which is acceptable for surveys of this type, and indicates that IAA members are engaged with this topic. We invited subscribers to complete a different survey. We currently have 50 subscribers – many of whom are not audiologists – and we received just one response which was from an audiologist. This would suggest that the merger is of little interest to those connected with hearing services who operate outside the profession. Suggestions that consumer interest or public interest will be served by a merger between ACAud and AudA may need further investigation.

A copy of the survey questions is attached. All responses were anonymous. The IAA survey results presented below are expressed as percentages of the survey respondents.

**Survey results at a glance**

14% (8 respondents) support the proposed merger.

52% (29 respondents) do not support the proposed merger.

The remaining respondents are either are unsure or ambivalent.

10% understand the merger.

52% do not understand the merger.

50% believe the merger will mean it is difficult to differentiate their practice from others.

Comments were grouped together as in favour (pros), not in favour (cons) or other.

26 comments were in favour of the merger. 5 themes emerged from the data, shown below in ranked order of frequency.

Lobbying ability	11
Resources	5
Scope of practice	4
Cheaper fees	3
Standards	3

All survey respondents were asked to list pros and cons to the merger, which explains why more comments in favour were recorded than the number of respondents who support the merger. Comments in favour of the merger were that there would be more resources available, that lobbying to government should be easier, that membership fees should be reduced and that standards would have to apply across audiometrists as well as audiologists. As seen in the data collected (attached), some of the comments in favour were conditional and hopeful, which is explained by the question seeking pros and cons from all respondents, regardless of whether they support the merger or not.

47 comments were not in favour of the merger. Four themes emerged, shown below in ranked order of frequency.

Differentiation between audiologists and audiometrists	24
Professionalism	11
Monopoly	9
Cost of running the organization	3

The most frequently expressed concern is the lack of differentiation between audiologists and audiometrists, which is perceived will be more difficult to convey to the public if only a single organization represented both professions. The view of survey respondents is that there will be a decrease in professionalism within the field of audiology without a separate organization for audiologists.

Concern was expressed that a monopoly in the professional body sector could have negative consequences. Whilst a small number of survey respondents believe that a single professional body will be more effective in lobbying government for recognition, even to the extent of incorporating IAA or expecting IAA to hold the same views as that body, others express concern that government may more easily dismiss the concerns of a single body. Concern was expressed that running costs would increase for a single body as overseas qualified audiometrists and TAFE qualifications would have to be monitored by the same organization that carries out those functions for audiologists.

Value of AudA membership, disappointment that AudA needs to merge with another association to have their voice heard, and opportunities for IAA to be recognised as representing the views of the audiology profession were the main comments classed as "other".

In summary, the survey results show a very small percentage of survey respondents support the merger. Not receiving enough information and not understanding the purpose of the merger are key issues to emerge. IAA members seek clarification and information about the way that scope of practice and promotion of two professions will be managed, as there is concern that this may be to the detriment of their businesses and to their professional image.

## **Discussion**

### **Monopoly vs Stronger Together**

A monopoly in the professional body sector that removes choice and competition could impact fees, resources, educational events and be more easily dismissed by government bodies. Whilst some survey respondents view a single organization as potentially stronger, the implication nonetheless of needing to merge with another organization to be stronger is interpreted by several respondents as AudA being too weak to represent the audiology profession. More evidence is needed to show how removing one professional practitioner body, adopting their model in the process, will result in recognition of the audiology profession and effective representation to government.

### **Scope of Practice**

The scope of practice documentation owned by AudA is currently not enforceable and is reliant on self-assessment. How the scope of practice will be affected by having a single professional body has not been explained. Survey respondents are concerned that an already unenforceable scope of practice will be diluted even further without a professional practitioner body that represents just the interests of audiologists. Taking over the accreditation of audiometrists training, CPD, overseas qualifications, audiologists qualified overseas who work as audiometrists in Australia and so on will place an additional drain on resources that could be spent on audiologists. The current structure does not force audiometrists (or audiologists) to join AudA (or whatever the new, merged association will be called) with HAASA membership remaining a viable alternative. The merger could potentially result in AudA taking on additional functions that incur high costs without any guarantee of additional membership income. Transparency of costs and expenses around establishing, promoting and enforcing defined scopes of practice and administering an organization that represents two professions, has not been provided to date.

Comments collected during the survey are attached.

IAA welcomes the opportunity to share these survey results. We anticipate that IAA members will engage with discussions to be held shortly about the proposed merger. Interestingly, the topic of what the merged association would be called was not raised in our survey. The assumption seems to be that the merger would amount to adopting the name Audiology Australia but that the model would be that currently used by ACAud, with members who are either audiologists or audiometrists. However, we do not believe this level of detail has been released to date.

We wish AudA and ACAud well in their endeavours to seek the views of their members on the matter of the proposed merger.



Grant Collins  
IAA President



Dr Tegan Keogh  
IAA Vice President

<b>Comments in favour of the merger (25 comments)</b>
1. Current issues may be addressed quicker
2. audiologists would no longer need to choose between peak bodies
3. better use of resource
4. Create a larger body to represent the industry. Greater voice?.
5. greater ability to fight for government recognition
6. higher quality educational components
7. I am a member of both organisations and was responsible in the process of ACAud coming into being. The pro for merger is I will be only paying one set of fees.
8. I presume all hearing care practitioners will be under one standard of practise and ethics.
9. I think the merger will force the now one organisation to fully distinguish between audiologists and audiometrists. I feel AudA has this published but ACAud tends to blur the two more as they have a high membership of audiometrists.
10. improved collaboration
11. It will be useful if it is a step towards stopping audiometrist training
12. larger group should convert to lower prof membership fees
13. Less confusion
14. mainly negative; however, I do concede that the larger membership may make discussions with stakeholders such as government easier/more effective, although I have my doubts.
15. Maybe fees will go down??
16. maybe professional learning opportunities might arise from this merger
17. Possibly greater representation, I feel that AudA has let us down over many years
18. PRO: knowledge sharing, skills sharing
19. Pros- If this was an endeavour towards strength in numbers for the purpose of registration it would be worthwhile
20. Pros: one association with potentially more resources to support members
21. stronger organization
22. The merged organization may have better control over how members advertise their qualifications to reduce public confusion about audiologists audiometrists
23. The pro's would be that audiometrist would need to obey to the same code of conduct that we as audiologist are committed to
24. There will no distinction between the (future) Audiologists within the same organisation. The Audiologists will not be questioned by clients about their credibility based on their membership. All that matters would be their skills and qualifications
25. Unified force for the industry
26. Larger profile to fight for in clinic electronic private health rebates and payments for services

<b>Comments not in favour of the merger (48 comments)</b>
1. Cons: potential for loss of definition of differences in qualification between audiologists & audiometrists
2. AudA would be seen as lowering their membership standards by this merger
3. Audiologists and audiometrists - the public and most decision makers already don't understand the difference. This will confuse things further
4. Audiologists and Audiometrists have very different professional standards and values
5. Audiologists are a unique professional group and should have their own professional body that represents them separate from non- professional groups like audiometrists
6. Audiologists have much more scope and further training in the field.
7. Audiometrists start using our only differentiating factor (AudA) membership, blurring the lines of practice
8. Clinical best practice and diagnostic rehabilitation is a strong part of our practice - I don't believe it will be enhanced with a merger between different disciplines.
9. CON: Consumer confusion as the difference in training and expertise offered by Audiologists relative to Audiometrists
10. Decreased job prospects for Audiologists as Audiometry seen to fill gaps better
11. de-values uni study & elevates Diploma qualified Audiometrist to the same status as Auds
12. devaluing of Audiologists skills
13. Differentiating audiologists/Audiometrist based on their professional body membership
14. Dilution of clarity to public on difference between Audiometry and Audiology
15. Dilution of opinion for advocacy
16. Dilution of quality of Audiology support and CPD content to accommodate Audiometrists
17. expenses - accreditation and training for audiometrists and their overseas counterparts
18. Harder for the public to differentiate between Audiologists and audiometrists
19. how will the public distinguish between Audiologists and Audiometrists
20. how would a consumer pick the difference between audiometrists and audiologists when both are certified as "clinically competent" by the same organisation.
21. I am concerned that this will be detrimental to independent practice and subject to 'bullying'
22. I currently am underwhelmed with the representation that AudA provides for Audiologists and see that there will be less choice and competition particularly for conferences and representation
23. I feel that there will be no distinction between audiologists and audiometrists if they can both be members of the same association
24. I think the distinction between audiologists and audiometrists would become more ambiguous with this model

25. If our peak professional body doesn't ostensibly recognise the difference in qualifications between audiologists and audiometrists, then how can we expect government to acknowledge the difference.
26. In fact, it makes membership of the new proposed organisation unattractive and irrelevant to me.
27. Increased fees
28. it will diminish the distinction between audiologist and audiometrist
29. Lack of recognition of our qualifications
30. Large corporates increase the number of Audiometrists employed as it becomes "acceptable" and seen as equivale
31. less differentiation; inequity in qualifications in same professional body
32. less inclination for AudA to inform the public over the distinction between the two professions
33. less inclination for AudA to regulate the industry
34. Less professional distinction between Audiology and Audiometry
35. makes it easier for big companies to employ Audiom. over Auds
36. Monopoly (Members are all left with no options when it comes to choosing a professional body membership
37. nil direct impact on our practice - but still a definite 'con' for the profession of audiology
38. No benefits for my practice at all.
39. No professional organisation that support Audiologists only other than IAA should you want to make a distinction between your skillset
40. Our business prides ourselves on having the training and experience to offer something specialised. In the current climate where anyone can sell hearing aids, and with no recognition from the government of the work that audiologists do in the community, our professional image will take a huge step back.
41. scope of practice, its already hard enough for the public to distinguish between audiometrists and audiologists.
42. the membership fees can go high (more than current rate)
43. the negative is that it once again blurs the line between the two professions.
44. The negative is...whether have a couple of diverse organisations helps in the political process rather than having one organisation that gets ignored by the government.
45. There are no pros... A merger would mean that the differentiation (that we have fought so long and hard to preserve) between audiometrists and audiologists would effectively disappear.
46. There is no option-B for the Audiologists to go to if they are not happy with their professional body
47. Why there have been separate PB's in the past, I think explains it all.

<b>Other comments – not classified as supporting or not supporting the merger, but relevant to the topic of professional bodies (39 comments)</b>
1. I see that the merger is possibly positive for IAA as it will be the only audiologist only representative
2. I would then ask IAA to list as an Industry Peak Body with the Federal Government so that I can continue my Medicare registration and not join the new body.
3. AudA should provide legitimate reasons as to why they are proposing this merger, how it benefits its members and what we will be losing in the process
4. ACAud was initially created / driven by AAAPP (now IAA) members who saw the potential for greater strength in dealing with Government (both AH and OHS) from a united business body. Unfortunately, both ASA and HAASA (as they were then) members continued in their previous bunkers, except for dual members of both ASA and ACAud taken by (mostly) AAAPP members. Now it appears that IAA is opposed to the merger and AudA and ACAud are in favour. Seems incredible.....
5. As I do not understand the logic behind the merger, cannot comment
6. Carefully consider the long- term detriment to our profession by proposing to roll it into a subset of hearing care, assimilated with less qualified and less expert individuals.
7. From what I hear from other organisations is that a more diplomatic approach from the IAA executive could be adopted/appreciated. This might actually work in IAAs favour as others would be more willing to listen/collaborate. I have concerns about the way IAA is positioning themselves amongst other organisations/government. IAA would be better placed to advocate for the needs of its members if there was a good working relationship was maintained with other organisations. I am starting to reconsider my membership and will have to forego my membership if the IAA executive facilitates friction with other organisations/government.
8. Having one strong body to represent all hearing care providers will make it easier for representation to government and other organisations. I support removing the current "adversarial" nature (us= good, them= bad) pervading many interactions. The things that the profession has in common are more important than the turf wars current being waged. IAA should focus on supporting independent audiology practice.
9. I am a little surprised that ACAud wishes to merge given the historical reasons for its creation from both audiometrists and audiologists in its membership.
10. I am ambivalent.. ASA now AudA actively opposed Audiologists and Audiometrists presenting a united front in 1992. The formation of a body such as ACAud was essential for the government to allow the private sector to receive government funds for the private sector supplying services on their behalf. The bulk of public servant Audiologists at that time aggressively opposed being associated with Audiometrists. Government sector Audiologists are a significant power block in AudA and their vision for hearing care in Australia is rather myopic. I really do not understand what is driving the underlying politics of the merger
11. I AM REALLY REALLY OPPOSED TO THIS MERGER - ACAUD WAS FORMED BY THEM FOR A PURPOSE IN THE PAST - NO BENEFIT TO AUDIOLOGISTS - BUT DRAMATICALLY WILL 'IMPROVE' THE STATUS OF AUDIOMETRISTS
12. I would like AudA to explain their position on the future of audiology TAFE courses and, in my opinion, the substandard training provided to audiology students. I have trained audiometrists and I am keenly aware of the deficiencies in a system which relies on an individual audiologist, with no teaching experience, to teach the wealth of knowledge required to be a good clinician.
13. I would like to know how the merger will promote the benefit of seeing an audiologist rather than an audiometrist?

14. I'd like to know these results, so I know if my thoughts are majority or minority. Can you also please circulate this survey a few times to really encourage people to complete?
15. If our peak professional body lumps audiometrist and audiologists together, I fear government and the public may question the value of our university training.
16. I'm so impressed with the quality of information, conferences etc. that IAA provide. Glad to be a member. Please keep campaigning for registration for us
17. Is it all about 'me?'
18. issues need to be clarified and distinctions made
19. It will confuse the general public and lead them to believe that Audiologists and Audiometrists have the same qualifications.
20. Looking back, I can see for some time now, AudA has not been promoting Audiologists to the public as the preferred profession for Audiologists.
21. More information is needed but that will not happen until 29/04/19 in WA.
22. NEGATIVE BENEFIT TO PRIVATE PRACTICE AUDIOLOGISTS - IT DIMINISHES OUR STATUS - WE ARE VASTLY MORE UNIVERSITY TRAINED!!!!
23. Now more than ever, IAA is essential to Audiologists as a body promoting our skills, ethics and integrity
24. Regulation; does this mean we moving towards regulation or away ? I'm not sure if it is a pro or a con
25. Thank you for advocating on our behalf
26. Thanks for taking this up with AudA. My comment to them as a member is that I am disappointed with their lack of insight into the profession. They are seeking to undo all the hard work of the founding audiologists. SHAME ON THEM!!!
27. The clear and present risks to our profession, its dilution, and its lessening status, while creating further public perception that all "hearing people" are glorified hearing aids salespeople
28. The merge will blur the lines in professional practice between Audiologists & Audiometrists. The merger devalues my degrees. The merger will make it easier for large companies to justify the employment of cheaper labour (Audiometrists). The merger may make Audiometrists over-confident in practice. The merger makes me want to be a part of a different professional body just for Audiologists.
29. The merger will mean that the voice of Audiologists as a profession will not be as distinguishable from Audiometrists. IAA will be the only body promoting Audiology as a differentiated profession to Audiometrists
30. The new professional standards suggest that the new body will be more interested in telling us how to run our business and expect small business to have a ridiculous number of policies and procedures more suited to a large organisation, and prohibitive to the running of an Independent Audiology Clinic.
31. The proposed merger will likely blur the lines between audiologists and audiometrists and confuse the general public even further. Given the issues with regulation and the lack of defined qualifications to utilise the title of "audiologist", I feel that this is a retrograde step.
32. There are two reasons why I continue to pay my professional membership to AudA; continual prof development/educational and the upholding of a minimum level of service quality, standardised across the group. Secondly, for positive consumer awareness and educating the public as to the VALUE offered only by Audiologists. AudA continue to underwhelm me on the former and continue to make no effort on the latter. AudA's value to me as a professional is extremely low and not worth the fees I pay to belong to the 'peak professional industry body'.
33. There should be a distinct difference between Audiologist and Audiometrist.
34. This is totally bullshit, to use a technical term...



35. This merger would go down as AudA's failure in becoming the peak professional body for Audiologists in Australia. Their reluctance to accept/allow fully qualified Audiologists from overseas gave the opportunity to ACAud to do exactly that and give them the due respect and recognition that they deserved. This led to a significant increase in loyal, long term memberships in ACAud which helped them grow into a stronger body over a relatively shorter time period. AudA missed an opportunity to be the preferred professional body for fully qualified Audiologists (with Masters degree from a university) practising in Australia. If that was the case, there would not have been a need for a merger as ACAud would be the professional body for Audiometrists with a diploma certificate and AudA would be that for Audiologists with a Master's degree from a university. With this merger, AudA is accepting ACAud as a professional body with fully qualified members and that they should work hand in hand for a future. The "Accredited Audiologist" logo that AudA members carried would no longer be a matter of pride, as those without that logo are essentially being given an entry to the same league. For independent audiologists, it may become harder to run a small business because when two different professional bodies merge to become a single powerful entity, the small businesses may lose their voice and significance by the same proportion. With only one large body that is too large to lobby, small businesses could get outnumbered by giant MNCs in the longer run.

36. This survey looks like it's all about 'me' and 'my welfare'. Think about the effect on the public you serve. Would it help them? That is the ONLY question. If times have changed, even consider if IAA can merge too?

37. Will AudA be recognising the qualifications and differences between audiologists and audiometrists to the media and public?

38. you need a good audiologist working in the field of hearing aids (there seems to be a thought amongst some audiologists that hearing aid fitting/rehab is easy and anyone can do it...my feeling is totally the opposite; with my experience gained in diagnostic, cochlear implant, occasional paed testing: rehabilitation including optimisation of hearing aids has been the most difficult/challenging of all (including the need to understand the theory well).

39. You're proactive and I appreciate the executive's ongoing raising of issues that we're too busy to follow on a day-to-day basis.



Independent audiologists  
australia member

## AudA and ACAud Merger - Stakeholder Feedback Request for IAA Members

1. AudA has invited stakeholder feedback on their proposed merger with ACAud. IAA is seeking your views on the announcement. Please select all the options that apply.

- I support the merger
- I do not support the merger
- I do not feel strongly one way or the other about the merger
- The merger will make it easier to differentiate my practice from others
- The merger will make it more difficult to differentiate my practice from others
- I fully understand the purpose of the merger
- I do not understand the purpose of the merger
- The merger will make it easier for me to employ and manage staff
- The merger will make it more difficult for me to employ and manage staff
- Other (please specify)

2. Please list the pros and cons of a merger between AudA and ACAud for you and your clinical practice.

3. Do you anticipate that a merger between AudA and ACAud would impact your business?

- Yes
- No
- Unsure
- I need more information
- Other (please specify)

4. Should IAA provide feedback to AudA and ACAud about what IAA members think about the proposed merger?

- Yes
- No
- Other (please specify)

5. If you answered yes to the question above, state what you want IAA to provide to Audiology Australia?

6. Do you have any other comments or feedback you would like to share with the IAA Executive?