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SIS
Remissvar
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SIS/TK 523, Hørselvårdstjänster
Svar på SIS-remiss 6913
avseende prEN 15927

**Senaste
svarsdatum** **2009-07-24**

Uppgifter om svarslämnaren

Företag/Organisation/Myndighet Enskild person

Företag/Organisation/Myndighet Hörskadades Riksförbund, HRF

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Datum 2009-06-26

Remissvar

- Avstår
- Tillstyrker utan kommentarer
- Tillstyrker med kommentarer
- Avstyrker med motivering
- Har erfarenhet inom det område förslaget täcker
- Har tillämpat förslaget
- Ej berörd
- Kommentarer till föreslagen svensk titel

Förslag till svensk titel: Hörapparatutprovning av legitimerad audionom

Datum

Svarslämnare: Hörselskadades Riksförbund,

2009-06-26

Kommentarer på: SIS-remiss 6913 Förslag: prEN 15927

1 ID	2 Clause No./ Subclause No./ Annex (e.g. 3.1)	(3) Paragraph/ Figure/Table/ Note (e.g. Table 1)	4 Type of comm ent	5 Comment (justification for changes)	(6) Proposed change	(7) Fylls i av SIS
HRF	Title		Ge	HRF anser att den svenska titeln "Hörselvårdstjänster" är för vid och blir missvisande eftersom standarden enbart tar upp processen kring hörapparatutprovning. Några andra tjänster än hörapparatutprovning tas inte upp i dokumentet. I Sverige utförs hörapparatutprovningar av en legitimerad audionom.	Hörapparatutprovning av legitimerad audionom	
HRF	1	Second paragraph, third sentence	Ge	HRF suggest an addition to the text to clear the scope of the standard. It is important to distinguish between hearing aid provision and further rehabilitation provision for hearing impaired clients.	The standard does not specify psychosocial rehabilitation for the hearing impaired clients.	
HRF	4.1	Third paragraph	Ge	HRF's opinion is that the fundamental, minimum educational requirements will be stated in chapter 4. The details can be stated in Annex A.	A hearing aid professional shall have completed a training of at least three years, in higher education institution or university, as a full-time student. Each academic year must comprise at least 30 teaching weeks and at least 25 hours of classes. The education should lead to a professional authorization. The details of the content of the education is specified in Annex A.	
HRF	4.3.6	First paragraph, second sentence	Ed	Hearing assistive devices instead of rehabilitation devices.	Other hearing assistive devices should also be available.	
HRF	4.4.1	First sentence	Ge	Many hearing impaired clients need rehabilitation services, such as psychosocial support, after a hearing aid fitting. HRF's opinion is that the hearing aid professional have a great responsibility to guide and inform the client to the right kind of support.	If the Hearing Profile determination (according to 5.2) indicates needs of rehabilitation services, the hearing aid professionals shall suggest that clients receive additional support that falls outside the scope of this document. The client shall be able to freely choose any other service professional as wished.	
HRF	4.2	Second paragraph, first item	Ed	The same information as in Annex B.	It shall be easy to contact the service provider by telephone, telefax, sms and e-mail.	
HRF	5.4.4	Third paragraph	Ed	Two instead of one.	Verification of improvement in hearing ability should be assessed in different ways. At least two	

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					of these shall be used:	
HRF	5.4.5	Fifth item	Ed	And instead of or.	Advise on the use of the hearing aid with induction loops and other hearing enhancement systems within buildings.	
HRF	5.5.1	First sentence	Ge	HRF:s opinion is that the target group for auditory training is wider than what is suggested in this paragraph.	For clients with hearing loss the full benefit of the hearing aids may only be reached by means of auditory training.	
HRF	Annex B	Second paragraph, fifth item	Ed		Principle of the tuning of different sound channels; microphone, magnetic coil, and (if possible) complementary devices	
HRF	Annex B	Second paragraph, sixth item	Ed		Complementary devices, possible external links; wire connection (through audioshoe) and wireless (through FM-system and/or Bluetooth)	
HRF			Ge	HRF's opinion is that in several places in the draft for standard there is a need to raise the requirements. HRF suggest a change from should to shall on the following places in the text. See below.		
HRF	4.1.1	Second paragraph, first sentence	Ed		The hearing aid professionals shall actively seek...	
HRF	4.1.1	Fourth paragraph, first sentence	Ed		If no national regulations exist a degree equivalent to EQF-level-5 (EU 2008/C111/01) shall be required.	
HRF	4.2.1	Third sentence	Ed		The desk shall be equipped with an induction loop system.	
HRF	4.2.4	First paragraph, third sentence	Ed		It shall be ensured...	
HRF	4.4.1	Second paragraph	Ed		In their relations with clients, the hearing aid professional shall be discreet and tactful, and sensitive to clients' psychological needs. The hearing aid professional shall on all occasions be cautious, calm and understanding. Clients' confidence in their	

1	2	(3)	4	5	(6)	(7)
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					hearing aid professional is an essential requirement of the profession. In their relations with clients, the hearing aid professional shall make sure that their comments have been well received and understood.	
HRF	4.4.1	Third paragraph	Ed		The hearing aid professional shall extend their service to the clients until optimal rehabilitation has been achieved. The hearing aid professional shall provide all the information necessary for the correct use and maintenance of the hearing aid and shall give the client the instructions that are essential to ensure the continued efficacy of the device.	
HRF	4.4.2	Second paragraph, first sentence	Ed		The hearing aid professional shall never attempt...	
HRF	4.4.2	Second paragraph, fourth sentence	Ed		The hearing aid professional shall undertake...	
HRF	5	Fourth paragraph	Ed		The hearing aid professional shall pay particular...	
HRF	5.4.1	Third and fifth sentence	Ed		If no contra-indications are present, bilateral fitting shall be recommended. The choice of hearing system(s) to be fitted shall be based on informed consent by the client. If requested, product documentation on the proposed solution shall be given to the client.	
HRF	5.4.3	Fourth paragraph, third sentence	Ed		The telecoil shall be excited by the appropriate magnetic field strength (see 4.3.6).	
HRF	5.5.2	Fifth paragraph, first sentence	Ed		If needed, further adjustments of the hearing aid settings shall be performed to improve hearing aid performance.	

