



The Rehabilitation Company Pty Ltd
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23 March 2017

Review of NDIS Costs
Productivity Commission
GPO Box 1428
CANBERRA CITY ACT 2600

Dear Sir/Madam

The Rehabilitation Company Pty Ltd, trading as RehabCo, Thrive Psychology and KidSkills Occupational Therapy, primarily delivers services in the workplace rehabilitation market from a network of nine Branches located in regional and metropolitan NSW and the ACT. The company has been in business for 20 years and employs 75 skilled and experienced allied health professionals across this Branch network. The introduction of the NDIS has provided an opportunity to improve the access to our team of excellent professionals to more people with disabilities who otherwise were not able to access our services.

Through our network of nine Branch Offices, RehabCo is currently looking to deliver NDIS Services across a range of Capacity Building supports including daily living, health & wellbeing, finding & keeping a job, improved relationships, increased social & community activity, along with co-ordination of supports. Delivery of Capital supports including home modifications, assistive technology assessments and driving assessments are also within the skills of our allied health professionals, along with the delivery of Early Childhood supports.

Access

The Rehabilitation Company Pty Ltd also has suitably qualified allied health professionals to deliver therapeutic services to children with developmental delay and those with long-term mental health needs and supports the inclusion of these participants into the NDIS, based on the client-driven choice and control service delivery approach of the scheme.

Volume

Once our registration process is complete, the Rehabilitation Company Pty Ltd will be able to efficiently and effectively deliver allied health professional services to NDIS participants requiring the application of high end therapeutic intervention and training where the NDIS planning process is robust, with assessment tools that are valid, reliable and accurate, resulting in the development of high quality NDIA Plans, detailing clear participant goals.

Price

The pricing of services for allied health professionals published in the NDIS Price Guide (Valid from 1 July 2016) are commercially neutral as they are equal to the median rate for service delivery, consistent with market expectations and satisfactory from RehabCo's perspective. That is, the rates published are equal to the median rate for services which places them in the category of competitive

neutrality. We recommend that pricing should remain in this neutral zone so as not to stifle or escalate the sector as a whole. Rates at the lower end of the market without the NDIS within the health sector remains buoyant. Rates that are above the median aimed at increasing available resources to the NDIS should be treated with caution given the heightened sensitivity created by a tight labour market.

Delivery

Over time, the demand for skilled allied health professionals to deliver therapeutic supports under the NDIS will increase as more people are accepted into the scheme, resulting in a tightening of the supply market, with upward pressure on price likely to become a factor in the retention of allied health professionals in the disability sector. The inclusion of agreed escalation parameters to review pricing across packages would be positive and should include agreed indexation.

RehabCo is already utilising skilled migration as a viable method to increase the supply of allied health professionals and supplement our staff resources, with processes already in place to review and verify suitability to practice in Australia through the Australian Health Practitioner Regulation Agency (AHPRA).

The Rehabilitation Company Pty Ltd has assessed the barriers to entry into the NDIS as medium to high. The quality and safety procedures, which are variable and required of registering service providers by each State/Territory places additional bureaucratic costs on the business. Whilst the intention to ensure the rights and safety of NDIS participants is important and necessary, the third-party verification process has imposed an additional layer of regulation and 'red tape' on tertiary educated professionals with rigorous registration requirements already in place. This requires a business assessment of the timing of the registered supports that will be delivered, due to the requirement to absorb the additional regulatory compliance costs.

Governance

The current governance processes are acceptable for a sophisticated organisation delivering health services. The additional layer of regulation in respect of staff who are already registered through Australian Health Practitioner Regulation Agency (AHPRA) is unnecessarily duplicating government regulation.

RehabCo has a business expectation that the NDIS payment system is tested, timely, accurate and easy to use.

RehabCo strongly supports efforts to establish the NDIS and looks forward to providing services to NDIS participants. Thank you for the opportunity to provide this submission.

Yours sincerely

Project Manager, NDIS
The Rehabilitation Company Pty Ltd,
trading as RehabCo, Thrive Psychology & KidSkills Occupational Therapy