

23 March 2017

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

Dear Sir/Madam

The Australian Rehabilitation Providers Association (ARPA) is the peak body representing the workplace rehabilitation industry in Australia. ARPA has a national membership of 150 member organisations of varying size from small professional rehabilitation practices, to national organisations, in turn representing approximately 1,400 full-time equivalent (FTE) Workplace Rehabilitation Consultants in more than 500 sites.

ARPA fosters and promotes the rehabilitation industry and community benefits of rehabilitation, and sees the NDIS as a valuable scheme and offers the following comments aligned with your Terms of Reference.

### **Delivery**

Ensuring the NDIS planning process is robust, with assessment tools that are valid, reliable and accurate will create efficiencies and ensure delivery of NDIS services by allied health professionals are efficiently directed to those participants that require knowledgeable and skilled input to grow participant capability and long-term benefits for both the participant and carers.

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.

Skilled migration is a viable method to increase the supply of allied health professionals, with processes already in place to review and verify suitability to practice in Australia.

Barriers to entry for allied health professionals into the NDIS is high. The variable quality and safety procedures required by each State/Territory places additional costs on businesses employing allied health professionals. Whilst the intention is 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. As an outcome, allied health professionals may choose to only provide NDIS services to those participants with the capability to self-manage their NDIS funding, with no requirement to register as an NDIS service provider, or adhere to the NDIS price guide and no longer have a requirement to absorb the regulatory compliance costs.

### **Price**

A reduction in the qualification and skills of allied health professionals who deliver services to participants in the NDIS to reduce costs would erode professionalism and result in a two-tier service ie lower skilled staff providing services to those in the long-term disability sector; higher skilled staff providing services in the broader primary health sector and rehabilitation market.

**Governance**

Efficiencies in allied health service delivery would be gained from greater accessibility to timely and accurate information from the NDIA.

This is evidenced by the publication of information on Assistive Technology and Home Modifications (February 2017) on the NDIS web-site with no process for service providers to seek timely clarification in place other than a generic email address with very slow response times.

Thank you for the opportunity to provide this submission.

Yours sincerely

National President  
Australian Rehabilitation Providers Association