

***Consultation on  
General Foundational Supports***

Occupational Therapy Australia

December 2024

## Introduction

Occupational Therapy Australia (OTA) welcomes the opportunity to provide a submission to the General Foundational Supports consultation.

OTA is the professional association and peak representative body for occupational therapists in Australia. There are over 32,000 registered occupational therapists (OTs) working across the government, non-government, private and community sectors in Australia<sup>1</sup>. Occupational therapists are allied health professionals whose role is to enable their clients to engage in meaningful and productive activities.

### **Occupational therapy and support for people with disabilities and their families**

Occupational therapy is a person-centred health profession concerned with promoting health and wellbeing through participation in occupation (activities). Occupational therapists achieve this by working with people with disability to enhance their ability to engage in the occupations (activities) they want, need, or are expected to do; or by modifying the occupation or the environment to better support their occupational engagement. Occupational therapists provide services across both clinical and non-clinical settings across the lifespan and have a valuable role in supporting children and adults living with developmental disorders; physical, intellectual, chronic and/or progressive disability; and psychosocial disability.

Occupational therapists have a critical role in providing services to people with disability, supporting people living with physical, intellectual, psychosocial and other disabilities. Occupational therapists work in a diverse range of settings including small, medium and large private practice, rehabilitation settings, paediatric services, and community services.

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Occupational therapists work with children and adults with disability, and their families and carers, to identify goals and engage them with appropriate supports and services that promote independence, social connection, economic participation and protect and sustain physical and mental health. They deliver highly skilled interventions including:

- functional capacity assessments, understanding the complex interplay between an individual's potential, barriers, skills and strengths;
- prescription and implementation of assistive technology and/or environmental modifications;
- positive behaviour support integrating understanding of development, disability, and environment;
- disability-related chronic disease management;
- driving assessments (when specifically trained to do so); and
- targeted, goal-focussed capacity building, for example, activities of daily living (ADL), or ADL training with participants with physical and/or psychosocial disability.

Occupational therapists are highly skilled in assessing the degree to which a person's disability affects their level of function in daily tasks from our understanding of the complex interplay of social,

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<sup>1</sup> Occupational Therapy Board of Australia (Australian Health Practitioner Regulation Agency), 2024; <https://www.occupationaltherapyboard.gov.au/News/Annual-report.aspx>

emotional/psychological, physical, developmental, environmental factors. Based on these assessments, occupational therapists make recommendations for, and then deliver, interventions that enhance and maintain an individual's functional capacity, and prescribe supports, aides and assistive technology that help everyday Australians live as engaged, valued and contributing members of society.

OTA has developed Capability Frameworks in several practice areas to ensure clinical practice skills occupational therapists should seek to achieve at different career stages. OTA is developing paediatric learning and development modules, in partnership with Deakin University, which align with OTA's Paediatric Capability Framework. This will enable the provision of high quality, evidence-based services by the occupational therapy profession and provide a surety to providers and funders of occupational therapy services about the delivery of safe and effective practice.

## **OTA response to the Consultation on Foundational Supports**

OTA welcomed the Report of the Independent Review of the NDIS, and its recognition of the obvious need for more support services in Australian communities for those who cannot access the NDIS.

OTA welcomes the plan to broaden the availability of supports for people with disability in the wider community, in terms of the general foundational supports that are intended to increase availability of, and access to information, build capacity, and the intention to develop targeted foundational supports for children with disability and developmental delay, and their families, and for people with psychosocial disability.

### **Key elements and principles for Foundational Supports**

#### Information, Advice and Referral

While OTA supports in principle the stated outcomes for reformed information, advice and referral service offering under General Foundational Supports, OTA urges consideration of the following matters:

- Families need to be able to identify as early as possible whether there might be developmental, psychological or other disability issues. This may not involve a formal diagnosis but should involve relevant advice, observation, and support from someone with the necessary expertise.
- There needs to be greater clarity about the pathway for people with disability or concerns about their, or others' wellbeing, from general foundational supports, to targeted, and into NDIS if that is required. Consideration needs to be given to the pathways between systems and how these will be as smooth as possible.
- Foundational supports must offer tailored, person centred and evidence-based supports that are flexible and can allow for fluctuations in intensity of care depending on the needs of the individual.

#### Capacity Building for Individuals

OTA supports in general the proposed reforms to capacity building service offerings for individuals and families, and communities.

We welcome the intention that a reformed capacity building program should offer consistency and equity of access to particular support types across the nation. While we support access to peer support as identified in the consultation, OTA suggests that this should also include access to suitably qualified health professionals, such as OTs who can provide tailored capacity building supports which align with the individual's presentation/needs. OTs can assess the depth and degree to tailor interventions such as information provision, promoting and supporting independence, and identification of strategies to support goals and preferences. We note that this addition aligns with key findings from the DSS Review into the Best Practice in Childhood Intervention which considers meaningful participation, inclusivity, and coordinated care with the individual and their family and care systems as key review findings and evidence for tailored therapeutic supports.

OTA also welcomes the recognition of areas that need consideration in the development of General Foundational Supports, including

- funding arrangements
- connectivity between services and network building
- ensuring equitable access across regional and remoter areas; and
- equity of access and consistency in service offering for people of diverse backgrounds, including First Nations people and LGBTI+ people.

We urge Governments to ensure supports for people with psychosocial disability to be prioritised as a part of General Foundational Supports, in recognition of the significant impact on this group with the loss of support and service availability outside the NDIS.

OTA also suggests that the following should also be considered in the development and delivery of General Foundational Supports:

- The Foundational Supports system must include
  - adequate needs identification to enable people to access the right service at the right time,
  - co-design with providers and peak bodies as well as people with lived experience and their families and carers, and
  - journey mapping so that services are fully funded, meet specific community needs and are easy to access.
- Governments must ensure that any new services are not delivered in a 'silo' and that people with disability can enjoy seamless access.
- Governments must work towards a 'one stop shop' approach where there is no wrong door to access services
- Consistency of service offering and equitable access regardless of location or background, while responding to local needs and issues.

### Sector Capacity

OTA welcomes the recognition of the significant barriers that may exist to delivery of General Foundational supports, including capacity of an already stretched disability and community support sector.

We suggest the following be given due consideration with identification of appropriate mechanisms for addressing them:

- Reforms and service roll out have significant lead time for gradual and sustainable implementation to enable markets to adapt without financial detriment and reduce the risk of market disruption or provider collapse.
- It will also be important that consideration is given to ensure service delivery is integrated, seamless and that access thresholds are not fragmented, duplicated, or create administrative burden, or barriers to access, for participants, or service delivery, for providers.

## Conclusion

OTA thanks the Department of Social Services for the opportunity to comment on the Consultation on General Foundational Supports. OTA would be happy to meet with DSS representatives to expand on any of the matters raised in this submission.

**Contact:** For further information or to discuss the contents of this submission, please contact Michelle Oliver, Chief Occupational Therapist at OTA via [policy@otaus.com.au](mailto:policy@otaus.com.au)