

**Australian Government
National Disability Insurance Agency**

2019-20 Annual Price Review

Occupational Therapy Australia submission

May 2019

Introduction

Occupational Therapy Australia (OTA) welcomes the opportunity to provide a written submission to the 2019-20 NDIS Annual Price Review.

OTA is the professional association and peak representative body for occupational therapists in Australia. As of March 2019, there were more than 21,000 registered occupational therapists working across the government, non-government, private and community sectors in Australia.

Occupational therapists are allied health professionals whose role is to minimise the functional impairment of their clients to enable them to participate in meaningful and productive activities. Occupational therapists particularly work with people with a disability and their families to maximise outcomes in their life domains including daily living, social and community participation, work, learning and relationships.

Pricing Increase for Therapy Supports

OTA joins with other allied health peak bodies in welcoming the recent pricing increase for therapy supports provided under the NDIS. An \$11 increase in the hourly rate – from \$179 to \$190 – better reflects the true costs of providing services to NDIS clients.

However, OTA members have expressed concern that price limits for psychology and physiotherapy services will increase further in some locations.

The following explanation as to why these professions were singled out has been published on the NDIS website:

Psychology and physiotherapy have higher and differentiated regional price limits based on analysis of existing NDIS providers and the national market. These price limits align with adjacent markets and will encourage providers to enter the Scheme.

OTA is not privy to the data on which this decision has been based, and, as such, the decision seems blatantly unfair to our members working in private practice. Occupational therapists tend to incur greater travel expenses than other allied health professionals due to their need to observe how clients operate in their own environment, and complete more written reporting. Furthermore, the NDIA has previously indicated that it is unable to monitor purchasing trends across regions.

As a matter of transparency, OTA calls on the NDIA to publish the analysis which led to higher price limits being imposed for psychology and physiotherapy services. We again call for a flat rate to be implemented across all the allied health professions to ensure providers are fairly compensated for the hours they dedicate to ensuring clients receive an optimal service.

Cancellations

The current cancellation policy enables providers to claim up to 90% of the fee where the appointment is cancelled after 3pm the previous day. There is also a cap on the number of cancellations that can be claimed. OTA does not support these existing arrangements.

In the case of a cancellation, if the appointment cannot be filled, the provider has lost the income while possibly having to pay staff to be idle. OTA recommends that 100% of the fee be claimable and that participants must provide at least 48 hours/two business days' notice when cancelling an appointment.

Members report that it can be difficult to fill a position as part of a group where the group is working on skill progression and interaction between participants. It is recommended that groups be billed for the program (regardless of attendance) rather than individuals being billed for attendance at each session.

Provider Travel

The existing travel policy does not adequately fund providers' travel costs. The capped 20 or 45 minutes of travel (depending on geography) rarely covers the real travel time and associated costs.

The policy is not equitable for participants; it makes no sense that the last participant of the day should fund the provider's return travel at the end of the working day. It is very challenging, if not impossible, at the time of developing a service agreement to be able to reliably inform a participant of the exact travel costs over the life of their plan. In addition, the existing policy has the unintended but highly unfortunate consequence of forcing NDIS participants to wait for therapy support because providers have to cluster their appointments geographically. This seriously compromises participants' ability to achieve their goals in a timely manner.

Existing travel arrangements are actually restricting choice and control for participants, as providers are being forced to deny support because of travel funding constraints. Adequate travel funding would enable participants to source and access the most appropriate therapist. In the case of occupational therapy, inadequate reimbursement for providers' travel is currently denying participants such vital services as complex home modifications, assistive technology, independent living skills, early childhood supports, behaviour supports, and SDA assessments. It is important that each participant has the opportunity to work with an occupational therapist who has the right skill set to help them achieve their goals.

OTA members seek a revised policy whereby providers are fairly reimbursed for their travel time as well as cost of travel, for example fuel and vehicle usage. It is imperative, however, that any revised travel arrangements do not increase the administrative burden of providing therapeutic supports.

The current price guide does not clearly state that travel is payable to therapy assistants. We ask that this be made clear in the next price guide.

Non-Face to Face Time

Occupational therapy support frequently includes a significant amount of non-face to face time. This may include AT research and applications, complex home modification applications, report writing and developing resources. OTA calls for increased clarity in the price guide in order to better inform participants and Planners as to what can be reasonably funded from the participant's plan. This enhanced clarity will greatly assist providers in managing participants' expectations.

Group and Centre-based Supports

Providers report that the existing recommended group ratios are not sustainable. It would be beneficial to be able to bill a participant for a group fee for a specified number of sessions. Some groups need to be larger, particularly those where the focus is on improving social skills. The group fee needs to take into account the significant amount of preparation involved in group sessions, something that is not currently captured in group pricing.

Conclusion

OTA thanks the NDIA for the opportunity to provide this submission to its annual pricing review. We would be happy to provide further information on any of the issues raised in our submission should this be required.