

**Feedback on the Draft NDIS eligibility and
reasonable and necessary support**

Presented to FAHCSIA

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Australian Physiotherapy Association

The Australian Physiotherapy Association (APA) is the peak body representing the interests of Australian physiotherapists and their patients. The APA is a national organisation with state and territory branches and specialty subgroups. The APA corporate structure is one of a company limited by guarantee. The organisation has approximately 12,000 members, some 70 staff and over 300 members in volunteer positions on committees and working parties. The APA is governed by a Board of Directors elected by representatives of all stakeholder groups within the Association.

The APA vision is that all Australians will have access to quality physiotherapy, when and where required, to optimise health and wellbeing. The APA has a Platform and Vision for Physiotherapy 2020 and its current submissions are publicly available via the APA website www.physiotherapy.asn.au.

Feedback on the Draft NDIS eligibility and reasonable and necessary support

Eligibility

1. *Does this description of eligibility cover all the things that you think a National Disability Insurance Scheme would need to know about you to determine whether you should be eligible to receive support under an NDIS?*

The APA supports this description of eligibility. By not listing particular disabilities, there is allowance for those who may fall outside of restricted descriptions to be included in this scheme.

2. *Are there additional questions that an NDIS should ask people before deciding if they are eligible to receive support?*

The APA believes there are no further questions needed for eligibility to be determined.

3. *General Comments*

As we have highlighted in our submission to the Productivity Commission (see attached), the APA supports the provision of advice by the NDIS to people about those instances where support would be more appropriately provided through non-NDIS services. Attention must be paid when identifying support needs that would be more appropriately met by the health and/or palliative care systems, particular identifying less restrictive musculoskeletal and affective disorders. Input should be sought from the related professions / peak groups to inform of the conditions that fall into this category.

The APA is concerned that some people may still encounter a fragmented service system. This is likely to occur where there are perceived opportunities by different agencies and organisations to cost shift. We thus believe that disincentives to cost-shifting should be built into the system.

The APA also believes there will inevitably be the small possibility that a person with disability may fall through the cracks - it would be helpful then to consider a "catch-all" mechanism built into the NDIS. It is important to ensure that individuals who are rightfully eligible for benefits are able to appeal through a one-off independent process if they have been overlooked using existing criteria.

As physiotherapists are well placed to assist with a person entering the disability support system, the APA would be in support of physiotherapists being included as part of the assessment process for eligibility to this scheme.

Physiotherapists already engage in a number of activities, including assessing an individual's capacity to move and keep moving, providing therapy to maximise function, mobility and for falls prevention, and prescribing appropriate equipment, supports and aids.

Reasonable and Necessary Support

1. *Are there supports that you think are important to include in an NDIS that would be excluded by this description?*

The APA does not see any supports being excluded by this description. Adequate support from the NDIS to access other systems where required will be important to ensure that all needs are met in a timely manner.

The APA however reiterates the need for a process that manages requests for interventions and equipment that may unintentionally be precluded from funding. This process should be informed by a representative panel of experts relevant to the condition and the intervention or equipment.

2. *Are there additional points that are needed to make sure that the support provided under an NDIS meets the reasonable and necessary support needs of people with disability?*

The APA believes that the tool used for assessing eligibility for the scheme and the tool used for assessing the level of support required to meet an individual's needs should remain distinct and separate. Assessment of needs should be performed by health professionals with the appropriate skills and adequate knowledge, such as physiotherapists. A physiotherapist in a service navigator role can also contribute to the needs assessment of a person with disability.

The needs of people with disability can change throughout their lifespan and often it is difficult for people with disability or their carers to create a long term plan for future care needs, such as the number of wheelchairs required, how often should therapy be provided and when specific interventions are needed.

The APA believes that health professionals, such as social workers, psychologists, occupational therapists and physiotherapists, can play the role of a 'navigator' and 'planner' of disability services for people with a disability and their carers. In cases where an individual's mobility is limited by disability, physiotherapists are ideally placed and possess the appropriate training and knowledge to engage with the specific care needs (including the likely progression of an individual's condition) of people with disability.

3. *Does this description of reasonable and necessary supports, combined with the eligibility statement, help you to understand who will be supported in an NDIS and what supports might be provided to them? If not, how do you suggest that the description be made clearer?*

The APA believes the descriptions of eligibility and reasonable and necessary supports are inclusive. It would be difficult to make these definitions clearer without the potential of excluding individuals with exceptional cases.

4. *General Comments*

The APA supports the NDIS and the definitions of eligibility and reasonable and necessary supports and believes that physiotherapists, along with other allied health professions, should play a key role in the assessment and ongoing planning for individuals supported by this scheme.