

12 April 2023

NDIS

Submission via email: [apr@ndis.gov.au](mailto:apr@ndis.gov.au)

Dear Sir/Madam

## **ACA Response to NDIS Annual Pricing Review – Consultation Paper**

Thank you for the opportunity to provide a response to the abovementioned paper.

### **About the Australian Counselling Association**

The Australian Counselling Association (ACA) is a leading and large peak body for Counsellors and Psychotherapists in Australia, with over 12,000 members. ACA serves a crucial role in advocating and advancing the profession of counselling and psychotherapy, such as establishing appropriate training standards, accrediting education courses, establishing and overseeing codes of ethical practice, assisting members with employment and practice development, and assisting the mental health consumer access to ethical and appropriate service providers.

The guiding questions throughout the Consultation paper, were a combination of questions targeted to a mixed audience e.g. organisation vs individuals. The ACA have chosen to respond on the following relevant sections (as numbered in the Consultation Paper).

### **Therapy supports**

The NDIA acknowledges feedback provided to the 2021-22 Annual Pricing Review where stakeholders previously suggested the price limits for therapy supports were too low, and the principal reason for an increase was the need to pay higher wages because of shortages of existing and future therapists. Other reasons included high compliance and audit costs and supposed strong demand for therapy outside the NDIS.

- What has been the main cost driver in delivering NDIS therapy supports over the past year? Is this different to the past few years?
- What proportion of your therapy revenue is derived from NDIS compared to other funding sources?
- Is there a price difference between rates for your NDIS participants compared to non-NDIS participants? If so, what is the rationale for the price difference?

## ACA Response:

There are a number of areas that need to be addressed under Therapy supports. The ACA provides this feedback as the result on an internal analysis conducted which highlighted a number of discrepancies that need to be addressed.

In accordance with the *NDIS Practice Standards: Verification Module – Required Documentation (September 2021)*, a Counsellor is limited to the following registration groups:

- 0128 Therapeutic Supports
- Any registration group listed under “Other Professions”

However in the *NDIS 2022-23 Annual Pricing Review Consultation Paper March 2023*, it is referenced that therapists can deliver supports under seven provider registration groups.

ACA recommends that these provider groups are extended to include:

- 0117 Development of Daily Living and Life Skills
- 0106 – Support Coordination
- 0132 – Support Coordination

Following an internal review of the pricing categories, ACA recommends that Counsellors have registration to the following groups as role responsibilities fit within a Counsellors skillset and experience with pricing tables updated and that an amendment is made to *NDIS Practice Standards: Verification Module – Required Documentation (September 2021)* to accurately reflect the services provided:

- **0117 Development of Daily Living and Life Skills** – Capacity Building and Training in Self Management and Plan Management
- **0117 Development of Daily Living and Life Skills** – Individual Social Skills Development
- **0118 Early Intervention Supports for Early Childhood** – Capacity Building for Early Childhood Interventions – Counsellor
- **0118 Early Intervention Supports for Early Childhood** – Capacity Building for Early Childhood Supports – Counsellor
- **0110 Specialist Positive Behaviour Support** – Specialist Behavioural Intervention Support
  - It is not defined in *NDIS Practice Standards: Verification Module – Required Documentation (September 2021)* what type of provider can deliver this service.
  - A Counsellor could deliver this service (excluding the use of restrictive practices).
  - ACA can work with NDIS to develop specialisation training for Counsellors to support and increase the workforce.
- **0106 – Support Coordination** - Assistance in Coordinating or Managing Life Stages, Transitions and Supports – Support Coordination Level 2: Coordination of Supports
  - It is unclear who NDIS define what type of provider can deliver this. In accordance with the description outlined in the *NDIS Practice Standards: Verification Module – Required Documentation (September 2021)*, a Counsellor can meet these requirements with their existing skillset.
  - The pricing scale ranges from \$100.14-\$150.21 to deliver this.
- **0132 – Support Coordination** – Support Coordination Level 3: Specialist Support Coordination

- In accordance with the description outlined in the *NDIS Practice Standards: Verification Module – Required Documentation (September 2021)*, a Counsellor meets these requirements with their existing skillset.
- ACA recommends that a Counsellor be added to the list of professionals listed in the description.

Under the “Other Professions” registration group, there are inconsistencies in the following:

- Therapy Supports and Early Childhood Supports
  - As an “Other Professional” – a counsellor can charge in accordance with the pricing schedules fees between \$193.99 to \$290.99
  - Can the NDIS team please provide further explanation and reasoning as to why Psychologists are set higher pricing schedules for delivering the same service?

The requirement for a pricing review for Therapy Services is to provide equality in rates compared to other allied health professionals delivering the same service. Rates were recently reviewed for psychologists and psychosocial coaching but no other qualified mental health practitioners.

The ACA recommends that a pricing review is conducted to address these inequalities:

1. Refer table below to review the pricing discrepancies across the categories for which a Counsellor can deliver mental health services.
2. Psychosocial Recovery Coaches – minimum qualifications is a Certificate IV in Mental Health/Mental Health Peer work with two years experience in mental health related work and the average pay scale is between \$93.34 - \$207.50 per hour. What is the definition of lived experience in this instance? Lived experience covers a range of experiences. NDIS to clarify which lived experience is required to support the qualifications to deliver this service. ACA recommends that psychosocial recovery coaching is expanded as a service delivered by Counsellors.
3. It is unclear in the *NDIS Pricing Arrangements and Price Limits 2022-2023 (Version 1.1 released October 2022)*, the difference between the Therapy Supports and Early Childhood supports whereby a Counsellor can deliver a service under “Other Professional” category at a rate of \$193.99. The description deems that the service provides “*Disability-related health supports to provide care other than nursing care to respond to the disability related health needs of a participant ...*” (page 53). Under the actual category of Early Childhood Supports (EC) – younger than 7, a counsellor is an identified role at a rate of \$156.16.



Counsellors are trained to deliver person-centred care using focussed psychological strategies that are consistent with services delivered under NDIS including:

- psycho-education including motivational interviewing
- cognitive-behavioural therapy, including behavioural interventions (behaviour modification, exposure techniques, activity scheduling) and cognitive interventions (cognitive therapy)
- relaxation strategies (progressive muscle relaxation, controlled breathing)
- skills training (problem solving skills and training, anger management, social skills training, communication training, stress management, parent management training)
- interpersonal therapy (especially for depression)
- narrative therapy (for Aboriginal and Torres Strait Islander peoples)

### **Support Coordination Supports**

The NDIA acknowledges feedback provided to the 2021-22 Annual Pricing Review, which included suggestions for tightening the definition of the role of Support Coordinators. There was also a range of varied activities undertaken, including unfunded activities and expectations of Support Coordinators.

What has been the main cost driver in delivering NDIS support coordination supports over the past year? Is this different to the past few years?

#### **ACA Response:**

Please see section 7 for our feedback on Support Coordination supports to expand to include Counsellors as providers for Level 2 and Level 3 Support. We agreed that definitions needs to be tightened our these roles.

### **Registration costs**

#### **Guide Questions – applicable to DSW related supports, Therapy, Support Coordination and Plan management supports only**

The NDIA acknowledges the feedback provided for the 2021-22 Annual Pricing Review. Stakeholders argued the NDIS Commission requirements were complex and had substantially increased administrative cost and burden. They also suggested the DSW Cost Model does not recognise the full costs associated with implementing the NDIS' quality and safeguarding requirements. Further, these quality compliance costs were claimed to have significantly increased in recent years.

1. Please provide an estimation of time spent by your employees to complete administrative tasks associated with registration, audits and compliance relative to other sectors (private or public).
2. Has the time spent on NDIS administrative/registration tasks increased in the past year?

3. What do you see as the benefits and barriers to registration? If any, please provide more details.

**ACA Response:**

As previously mentioned, these questions are aimed at employees of organisations and does not cater for individuals who may be working in private practice.

As a peak membership and representative body for the Australian Counselling and Psychotherapy sector, in order for NDIS providers to meet registration requirements, it is imperative that they meet the minimum standards as set out by NDIS to work under this scheme. It is important to acknowledge that NDIS providers cover a wide range of industries outside of Allied Health so therefore registration needs to be as streamlined as possible. For Counsellors, the addition of their peak body registration ensures another layer of qualified and experienced staff to deliver services to those in need.

However, in order for NDIS registration to be effective, NDIS must monitor compliance across all industries by means of financial, procedural and qualification audits, national complaints procedures, de-registration of providers and working with other registration bodies to update systems in the event of cancellation of memberships and/or de-registration. There is more work that needs to be done in this space to ensure the safety of the public receiving services under this program.

There is an opportunity for the ACA to work with the NDIS team to establish a specialised ACA team to support the implementation of the necessary quality and safeguarding requirements to meet compliance for counsellors working in private practice. This would remove some of the complexities and time costs incurred to set up and/or maintain these systems. ACA has over 12,000 members in Australia and therefore has the means to support counsellors in private practice under agreed compliance processes. We invite the NDIS Team to discuss this further with the ACA on how we can support all parties involved.

**Labour Market**

**Guide Questions – applicable to DSW related supports, Therapy, Support Coordination and Plan management supports only**

1. How have NDIS pricing arrangements and price limits assisted your ability to hire and retain workers compared to other sectors and the private market? Please provide evidence.

How have NDIS pricing arrangements and price limits assisted in meeting the sector demand and/or supply for NDIS supports? Please provide evidence.

In your view, what is the best way(s) to address workforce issues?

**ACA response:**

It is noted that these questions are aimed at an organisation and not for a Counsellor in private practice or individual NDIS service provider. ACA provide feedback on the current labour market in Australia.

Australia is a mental health crisis with Covid-19 bringing the mental health issue to the fore. Whilst the following statistics are not represented exclusively of the Disability workforce, it

represents the wider issues facing the mental health workforce in Australia. In research commissioned by the ACA (conducted by Pure Profile), the below is the percentage of waiting times being experienced by the Australian public during the period February 2022 and March 2022.

### Psychologist/Psychiatrist - Waiting Periods

	ACT	NSW	NT	Qld	SA	Tas	Vic	WA
Wait 4 - 6 weeks	27%	19%	32%	32%	33%	31%	30%	29%
Wait 7+ weeks	14%	20%	7%	7%	16%	9%	14%	18%

Research conducted by the Australian Institute of Health and Welfare (AIHW), 2022 reported that:

- Over 2 in 5 Australians experience a mental disorder at some time in their life
- 1 in 5 Australians had a mental disorder in the past 12 months
- 15% of Australian report experiencing high to very high mental distress in the past 12 months

The ACA acknowledges that the NDIS provides a high percentage of employment opportunities to our members within the counselling profession. Counsellors are an under-utilised workforce available to assist in addressing the growing unmet need of persons seeking support from a mental health professional.

Counsellors are appropriately trained to deliver psychological services under NDIS to address the following:

- The nation-wide shortage of psychologists has been estimated to exceed 7,700 FTE. Unmet need for psychological treatment services is especially evident among low socio-economic groups, and in rural and remote areas.
- Demand for psychological services appears set to remain strong for many years.
- Strong demand coupled with the workforce shortage risks entrenching unmet need.
- Impacts of social pressures – housing crisis, cost of living, interest rate rises, Covid-19 impacting mental health.

In terms of addressing the workforce issues – NDIS need to further define qualifications and training:

- Counsellors qualifications to be defined. Currently the definition for a counsellor states “a member of the ACA”. The ACA would like further clarification around this to reflect a Level 2, 3 or 4 which will be dependent on the experience required. ACA can assist in these discussions.
- NDIS behaviour support practitioner – further details need to be provided by the NDIS. ACA welcomes the opportunity to work with NDIS to look at how we can provide further training to counsellors to gain relevant training.
- It is difficult to identify what NDIS skill set training is required. Specifically with regards to Functional Capacity Assessment. The recommendation is that providers complete training via the Australian Mental Health Outcomes and Classification Network (AMHOCN) website, and complete the necessary module to gain certification. The ACA

have received feedback that the completion of a Functional Capacity Assessment is more complex and requires further training. Is the NDIS looking to review its minimum standards in this instance to cater for all providers?

- There is no specific NDIS vocational training available. Qualifications like community service, mental health and disability cover concepts and may mention minor compliance and delivery in the NDIS space but very limited and only if the RTO has specifically customised their assessments for this purpose. It in no way makes a person 'job ready' for working and knowing about the NDIS which is what a vocational qualification is meant to do. Very few of these qualifications have any trauma informed training or other necessary skill sets needed to practice competency under the NDIS
- Worker modules completed on the Quality and Safeguard commission are highly inadequate
- Inconsistent answers from the NDIS staff/planners and Quality Safeguard Commission
- NDIS need to provide professional development training on the NDIS website

If you require any further information, please do not hesitate to contact me on 07 3356 4255 or [aca@theaca.net.au](mailto:aca@theaca.net.au).

Yours sincerely,

**Jodie McKenzie**

Chief Executive Officer

Australian Counselling Association

## References

ACA (Australian Counselling Association) (2022). *Australia's Hidden Health Crisis*. Research conducted by Pure Profile.

<sup>1</sup>AIHW (Australian Institute of Health and Welfare) 2022, *Mental Health: Prevalence and Impact* [Mental health services in Australia: Mental health: prevalence and impact - Australian Institute of Health and Welfare \(aihw.gov.au\)](https://www.aihw.gov.au/reports/mental-health/prevalence-and-impact)