

National Disability Strategy, Governance and Engagement Section
Department of Social Services
GPO Box 9820
Canberra, ACT 2601

Via email: disabilityreform@dss.gov.au

14 December 2020

Dear National Disability Strategy, Governance and Engagement Section

Re: Public Consultation for the NDS and NDIS Outcomes Frameworks

Occupational Therapy Australia (OTA) welcomes the opportunity to comment on the draft Outcomes Frameworks for people with disability under the National Disability Strategy (NDS) and National Disability Insurance Scheme (NDIS).

OTA is the professional association and peak body representing occupational therapists in Australia. As of October 2020, there are more than 24,000 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 enable their clients to engage in meaningful and productive activities. A significant proportion of their clients are people with disability, including those who receive funding through the NDIS.

Overall, OTA members found the proposed framework and the elements contained therein to be sensible. It is particularly encouraging to see the Department of Social Services, rather than the National Disability Insurance Agency (NDIA), take a leading role in developing and progressing disability policy. OTA believes the Department is better placed to take a broader view of the disability sector, of which the NDIA is one – albeit a very important – component.

OTA understands that the Department is also interested in:

“What else should be considered when we are monitoring and measuring the impact of activities on people with disability”.

In response to this question, OTA members suggest that the Department consider how these Frameworks can be aligned with existing systems and standards across the disability, health and aged care sectors.

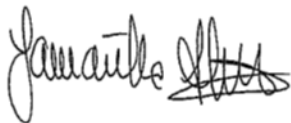
Given we are an ageing population with increasingly complex needs, many Australians will move across the disability, health and aged care sectors across their lifespan. OTA members report that this often results in inequity, complexity, confusion and abrogation of responsibility at all levels. This could be alleviated by taking steps to align the outcomes and governance standards against which we monitor, undertake accreditation and promote continuous quality improvement across these sectors.

For example, I understand that from 1 December 2020, Residential Aged Care providers who support NDIS participants need to be registered with the NDIS Quality and Safeguards Commission. Work is underway to align schemes and standards, with the *NDIS Legislation Amendment (Transitioning Aged Care Providers) Rule 2020* under consideration in states and territories.

As the Department develops the NDS and NDIS Outcomes Frameworks, I would urge you to consider opportunities for greater harmonisation with existing frameworks across the health, disability and aged care sectors.

Thank you once again for the opportunity to comment on the NDS and NDIS Outcomes Frameworks. OTA looks forward to working with the Department as it endeavours to improve outcomes for people with disability.

Yours sincerely



Samantha Hunter
Chief Executive Officer