

A Joint Submission to the DSS Consultation on Draft Lists of NDIS Supports 23rd August 2024

Submitted by:

- the *Applied Neuroscience Society of Australasia (ANSA)*; and
- the *Biofeedback Certification International Alliance – Australia (BCIA-A)*.

Reply to:

Jillian Harrington, ANSA President (president@appliedneuroscience.org.au)
Nia Barnes, BCIA-A Chair (bciaaustralia@gmail.com)

Submitted via:

1. Email to: NDISConsultations@dss.gov.au
2. Post to: The Right Honorable Mr Bill Shorten MP
Minister for the National Disability Insurance Scheme
NDIS Consultations,
GPO Box 9820,
Canberra ACT 2601
3. Webform: [Contact \(NDIS\) \(billshorten.com.au\)](https://www.billshorten.com.au/contact-ndis)

Attention: The Right Honourable Mr Bill Shorten MP

As Community Members and Professional Peak Bodies responding to the consultation on the Draft List of NDIS supports we note:

1. The List covers the kinds of disability supports that should be included, noting that Neurofeedback administered by health professionals is a Therapeutic Support.
2. Neurofeedback has been mis-classified as “wellness and coaching related”. Neurofeedback administered by health professionals is an effective, value for money therapeutic support. It allows NDIS participants to apply their functional skills to improve participation and independence in daily, practical activities. It should be removed from the Exclusion list to avoid restricting participants’ rights to an effective, beneficial support which impacts significantly on functioning.
3. Further feedback is provided below to qualify our position on Neurofeedback as a NDIS Support, noting substantial empirical research supporting its use in areas such as communication, cognitive function, behaviours of concern, as well as emotional regulation, reducing the impact of disability on relationships, education and occupational capacity.

Professional Neurofeedback is **effective**. There is extensive research supporting Neurofeedback’s efficacy as a cost-effective, efficacious and beneficial modality for people with moderate to severe disability. Please find below, a collection of peer-reviewed, scientific literature supporting the use of neurofeedback as a therapeutic support to achieve better cognitive function, memory, attentional capacity, learning ability, emotional regulation, behavioural regulation, relationship functioning, sensory processing, and autonomic functioning.



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Professional Neurofeedback (NFB) as a NDIS Therapeutic Support represents **value for money**. In Neurofeedback, participants with a range of disabilities work toward agreed functional goals with measurable outcomes for better cognitive, emotional, and behavioural functioning. NFB uses real-time feedback technology and learning theory, to shape brainwave activity and change brain functioning. The changes in functioning NFB brings, are durable and provide a platform for participants to achieve other goals. Functional improvement in mood regulation and decision-making have potential to reduce restrictive practices and associated human and material costs for participants and the NDIS.

When a health professional and participant determine that NFB is an appropriate support, their decision is **accountable** to registration standards and backed by expertise developed in Australia and internationally for over 60 years, specialist training and ongoing professional development, and innovative feedback technology.

NFB is an evidence-based NDIS Support which **benefits participants** when delivered by appropriately qualified health professionals. Professional NFB is a non-invasive, person-centred approach to improving function and quality of life for children and adults with lifelong disability-related impairment. With the application of neuroscience, NFB practitioners support participants to improve self-regulation toward NDIS goals, and allow participants with severe and lifelong disability, to improve community participation, social relationships, and mitigate many effects of their disability.

Mr Shorten, ANSA and BCIA-A work to ensure that the many registered health practitioners including psychologists, psychiatrists and occupational therapists using neurofeedback in their work, are highly trained and accredited to international standards of practice. We are deeply concerned to see Neurofeedback, relegated to “wellness and coaching related” services in the draft support lists. Professional Neurofeedback is a highly targeted, efficacious, evidence-based approach to improving function and reducing disability. We note that the term neurofeedback may include services or devices which are NOT provided by health practitioners, however we are concerned that naming neurofeedback as an excluded support will also remove access to evidence-based Professional Neurofeedback services. **We urge the Department to remove neurofeedback from the proposed list of “Supports that are not NDIS supports”, and allow appropriately trained health professionals to determine, as they might for other approaches including more traditional cognitive and behavioural therapies, when it might best be used as a therapeutic support to support participant language, communication, independent functioning, interpersonal interactions and community living.**

ANSA is keen to work together with the Department and the NDIA to ensure that NDIS participants continue to have cost-effective access to professionally-administered neurofeedback in supporting them to achieve their NDIS goals. We would welcome the opportunity to meet with you for further consultation, to provide further evidence, or to assist in any way.

Jillian Harrington, ANSA President (president@appliedneuroscience.org.au); Director – Australian Psychology Accreditation Council; Deputy Chair, APS College of Clinical Psychologists; Chair, Blue Knot Foundation

Nia Barnes, BCIA-A Chair (bciaaustralia@gmail.com)



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About ANSA and BCIA-A

The Applied Neuroscience Society of Australasia (ANSA) is the peak body for health practitioners (psychiatrists, psychologists, occupational therapists, social workers, counsellors, and others) who have broadened their scope of practice to incorporate neuromodulation into their range of consumer supports. ANSA promotes education and professional excellence in the field of Applied Psychophysiology, inclusive of Neurotherapy (aka neurofeedback therapy), often used in conjunction with other forms of biofeedback as well as medicine, clinical and educational psychology, social work, nursing, chiropractic, counselling, and physiotherapy approaches to support consumers toward better daily functioning, and quality of life. Qualified professionals who practice within this framework, are invited to apply for membership of ANSA.

In 2010, the Applied Neuroscience Society of Australasia agreed to the development of an independent body whose role would be to develop and oversee standards for neurofeedback certification within Australasia. It was agreed that the new organization would affiliate with the Biofeedback Certification International Alliance (*BCIA - formerly the Biofeedback Certification Institute of America*). In 2011, Biofeedback Certification International Alliance – Australia Inc (BCIA-A) first registered in Australia and a Committee formed.

BCIA-A certifies individuals who meet education and training standards in neurofeedback and progressively re-certifies those who satisfy continuing education requirements. In doing so, we strive to protect the welfare of consumers, to provide credibility to Neurofeedback Practitioners and advance in the field of neurofeedback.



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