

**AAPI**

AUSTRALIAN ASSOCIATION  
of PSYCHOLOGISTS INC

*a true voice for psychology*

# Feedback on the Draft National Autism Strategy

24 August, 2024

Dear Department of Social Services,

The Australian Association of Psychologists incorporated (AAPi) appreciates the opportunity to provide feedback on the draft list of NDIS supports from the perspectives of psychologists working with individuals who are participants in the scheme and their families. We hope the information we provide below is of assistance. We have focussed our feedback on matters that are particularly pertinent to the practice of psychology in Australia.

## NDIS supports list

### Supports that are 'NDIS supports'

#### Accommodation/ tenancy assistance

AAPi agrees with proposed supports and carve outs in this category.

#### Assistance Animals

AAPi agrees with proposed supports and carve outs in this category.

#### Assistance In Coordinating or Managing Life Stages, Transitions and Supports

AAPi agrees with proposed supports and carve outs in this category.

#### Assistance to Access and Maintain Employment or higher education

AAPi agrees with proposed supports and carve outs in this category.

#### Assistance With Daily Life Tasks in a Group or Shared Living Arrangement

AAPi agrees with proposed supports and carve outs in this category.

#### Assistance With Travel/Transport Arrangements

AAPi agrees with proposed supports and carve outs in this category.

#### Assistive Equipment for Recreation

AAPi agrees with proposed supports and carve outs in this category.

#### Assistive Products for Household Tasks

AAPi agrees with proposed supports and carve outs in this category.

#### Assistive Products for Personal Care And Safety

AAPi agrees with proposed supports and carve outs in this category.

#### Specialist Positive Behaviour Support

AAPi agrees with proposed supports and carve outs in this category.

#### Communication And Information Equipment

AAPi agrees with proposed supports and carve outs in this category.

### Community Nursing Care

AAPI agrees with proposed supports and carve outs in this category.

### Customised Prosthetics (includes Orthotics)

AAPI agrees with proposed supports and carve outs in this category.

### Daily Personal Activities

AAPI agrees with proposed supports and carve outs in this category.

### Development Of Daily Care And Life Skills

AAPI agrees with proposed supports and carve outs in this category.

### Disability-Related Health Supports

AAPI agrees with proposed supports and carve outs in this category.

### Early Intervention Supports For Early Childhood

These early intervention supports must be based on current supports that are already provided through the scheme, with allowances for evidence-based emerging and future support. It would cause significant harm to the disabled community to lose access to early intervention supports that they have been receiving to improve their functioning and participation. Psychologists and allied health practitioners who provide these services currently should be included on an ongoing basis with their recommendations for early intervention supports based on their assessments of participants guiding what is funded through the NDIS. There should not be a restriction on the types of therapies that can be used if they are evidence-based, provided by adequately qualified practitioners, and provide improvements in functioning and participation for participants. If this is the case, AAPI agrees with proposed supports and carve outs in this category.

### Exercise Physiology & Personal Well-being Activities

AAPI agrees with proposed supports and carve outs in this category.

### Group And Centre Based Activities

AAPI agrees with proposed supports and carve outs in this category.

### Hearing Equipment

AAPI agrees with proposed supports and carve outs in this category.

### High Intensity Daily Personal Activities

AAPI agrees with proposed supports and carve outs in this category.

### Home Modification Design and Construction

AAPI agrees with proposed supports and carve outs in this category.

### Household tasks

AAPI agrees with proposed supports and carve outs in this category.

### Innovative Community Participation

AAPi agrees with proposed supports and carve outs in this category.

### Interpreting and Translation

AAPi agrees with proposed supports and carve outs in this category.

### Management of Funding for Supports

AAPi agrees with proposed supports and carve outs in this category.

### Participation in Community, Social and Civic Activities

AAPi agrees with proposed supports and carve outs in this category.

### Personal Mobility Equipment

AAPi agrees with proposed supports and carve outs in this category.

### Specialist Disability Accommodation (SDA)

AAPi agrees with proposed supports and carve outs in this category.

### Specialised Driver Training

AAPi agrees with proposed supports and carve outs in this category.

### Specialised Hearing Services

AAPi agrees with proposed supports and carve outs in this category.

### Specialised Supported Employment

AAPi agrees with proposed supports and carve outs in this category.

### Specialised Support Coordination

AAPi agrees with proposed supports and carve outs in this category.

### Therapeutic Supports

These therapeutic supports must be based on current therapeutic supports that are already provided through the scheme, with allowances for evidence-based emerging and future support. It would cause significant harm to the disabled community to lose access to therapeutic supports that they have been receiving to improve their functioning and participation. Psychologists and allied health practitioners who provide these services currently should be included on an ongoing basis with their recommendations for therapy supports based on their assessments of participants guiding what is funded through the NDIS. There should not be a restriction on the types of therapies that can be used if they are evidence-based, provided by adequately qualified practitioners, and provide improvements in functioning and participation for participants. If this is the case, AAPi agrees with proposed supports and carve outs in this category.

### Vehicle Modifications

AAPi agrees with proposed supports and carve outs in this category.

## Vision Equipment

AAPI agrees with proposed supports and carve outs in this category.

## Supports that are not 'NDIS supports'

### Day-to-day living costs

Lifestyle related:

- Standard toys, balls, racquets, uniforms, membership costs, and other costs associated with recreational sports—if a participant is significantly impaired in social engagement and a qualified allied health practitioner assesses that access to funding support for participation would be beneficial to support engagement, the NDIS should fund this.
- Musical instruments, music production, social media production—For some disabled individuals, these items would be required as significant modifications and support are necessary for them to participate in these activities. Where a qualified AT assessor makes a recommendation, these items should be funded in a participant's NDIS plan.
- General conference fees – where the conference is specific to the participant's disability, their carer or the participant should be able to access funding to support their participation. This is because participation in disability-specific education may reduce the assistance that the participant needs on an ongoing basis.
- Sex toys. For some participants, specialist-prescribed assistive devices to assist with sexual function are required. AAPI would ask that where a qualified AT assessor is making a recommendation for devices that would fall in this category, they be approved under a participant's plan. Access to qualified sex therapists would also be important to fund for participants where their sexual function and relationships are significantly impacted by their disabilities. Denying access to these services could negatively impact their relationships and sexual functioning.
- Menstrual products—Those with many types of disabilities often require menstrual products to attend to self-care and personal hygiene in a way that is accessible given their disability. This affords the disabled person dignity and control over their bodies. Where a qualified AT assessor makes a recommendation for this type of assistive device, it should be funded by their NDIS plan.
- General play equipment, indoor or outdoor - Where a qualified AT assessor recommends this type of assistive device, and it has a use that would facilitate skill acquisition or improvements in functional capacity, there should be NDIS funding allowances.
- Membership of a recreational club - if a participant is significantly impaired in social engagement and a qualified allied health practitioner assesses that access to funding support for participation would be beneficial to support engagement, the NDIS should fund this.

Clothing related:

- watches (including smart watches) – The use of smart watches can support the development of increased functional capacity in many areas of functioning. Where a qualified AT assessor recommends this type of assistive device their NDIS plan should fund it.

*Carve outs that may be considered ‘NDIS supports’ for certain participants*

AAPI agrees with carve outs that may be considered NDIS supports in this category.

**Not value for money/not effective or beneficial**

Alternative and complementary therapies:

- Yoga Therapy. There is significant research demonstrating the anxiolytic benefits of Yoga for patients presenting with PTSD, anxiety, depression, acquired brain injury, and complex trauma [1-2]. There may be a way to demonstrate the efficacy of Yoga under the NDIS, if specific outcome measures are used. (Silveria, 2020), (Sundstrom, 2023).
- Wilderness Therapy – There is evidence that this type of therapy, when conducted by a qualified allied health professional, is effective and would assist participants with community and social engagement and improve communication and relationship skills.

Wellness and coaching related:

- Hypnotherapy—There is significant evidence of the efficacy of hypnotherapy for many disability-specific issues. Where a qualified professional has recommended hypnotherapy for a participant's functional improvement, this should be funded under the NDIS.
- Neurofeedback- A significant body of research has been amassed regarding the efficacy of Neurofeedback - <https://isnr.org/isnr-comprehensive-bibliography> (Darling, 2024). While its use as a clinical treatment would not be appropriate under the NDIS, there are ways that psychologists use this type of therapeutic support to improve the functional capacity of participants. An example of this would be to teach emotion regulation skills to clients who have impaired executive function or altered brain structures, to increase physical activity levels in those with disabilities that affect energy levels and movement, functional improvements in movement disorders, traumatic brain injury, stroke, and cerebral palsy. Where a qualified professional has recommended neurofeedback for the functional improvement of a participant, this should be funded under the NDIS.
- Gaming therapy – psychologists and other allied health professionals effectively use gaming platforms to provide therapeutic intervention that would be consistent with the goals and aims of the NDIS. The use of VR and video-game environments to facilitate social engagement, practice community engagement and communication should be allowed under therapeutic supports if the therapy is not clinical in nature and is provided to improve the functional capacity of participants.

*Carve outs that may be considered 'NDIS supports' for certain participants*

AAPi agrees with carve outs that may be considered NDIS supports in this category.

**Mainstream – Health**

- Diagnostic assessments and screening services—where these relate specifically to disability and will assist with the provision of services and supports to assist the participant in improving their functioning, diagnostic assessments and screening services should be funded by the NDIS. Early intervention participants also require assessments to facilitate their entry into the scheme.

*Carve outs that may be considered 'NDIS supports' for certain participants*

AAPi agrees with carve outs that may be considered NDIS supports in this category.

**Mainstream – Mental Health**

AAPi agrees with proposed supports and carve outs in this category.

**Mainstream – Child Protection and Family Support**

- Family therapy—where there are significant issues related to the disability of one family member, including adjusting to a new impairment, family therapy focussed on the family adjusting to support the needs of the disabled family member is appropriate to be funded under a participant's NDIS plan. This service is not provided through any other service and will directly reduce the support that the participant requires ongoing from the NDIS. A suitably qualified allied health practitioner should be funded to provide family therapy.
- Marriage and relationship counselling—Where there are issues in a relationship due to one or both people's disabilities, services provided to improve the functioning of the dyad and facilitate the support of the NDIS participant should be funded under the participant's NDIS plan. This will reduce the amount of support they require from the NDIS on an ongoing basis. This should be provided by a suitably qualified allied health practitioner.

*Carve outs that may be considered 'NDIS supports' for certain participants*

- Parenting programs specific to a disability need (could be considered under capacity building supports)

**Mainstream – Early Childhood Development**

AAPi agrees with proposed supports and carve outs in this category.

**Mainstream – School Education**

AAPi agrees with proposed supports and carve outs in this category.

**Mainstream – Higher Education and Vocational Education and Training**

AAPi agrees with proposed supports and carve outs in this category.



### Mainstream – Employment

AAPi agrees with proposed supports and carve outs in this category.

### Mainstream – Housing and Community Infrastructure

AAPi agrees with proposed supports and carve outs in this category.

### Mainstream – Transport

AAPi agrees with proposed supports and carve outs in this category.

### Mainstream – Justice

AAPi agrees with proposed supports and carve outs in this category.

### Mainstream – Aged Care

AAPi agrees with proposed supports and carve outs in this category.

### Unlawful goods and services

AAPi agrees with proposed supports and carve outs in this category.

### Income replacement

AAPi agrees with proposed supports and carve outs in this category.

## Conclusion

The Australian Association of Psychologists Incorporated (AAPi) appreciates the opportunity to provide feedback on the Draft NDIS Supports List. Our recommendations focus on ensuring disabled Australians receive the supports they require from the NDIS to facilitate inclusion, accessibility, economic and social participation, and improved quality of life for disabled Australians. We emphasise the importance of the continuance of supports provided by psychologists within the NDIS to achieve these aims. AAPi remains committed to supporting Australian psychologists to provide high quality services to disabled Australians, ensuring that they and their families receive adequate support and can live their best lives.

Sincerely,



Amanda Curran  
Chief Services Officer  
Australian Association of Psychologists Inc  
Phone 0488770044  
Email [amanda@aapi.org.au](mailto:amanda@aapi.org.au) Website [www.aapi.org.au](http://www.aapi.org.au)



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