

Friday 16 August 2024

NDIS Consultations  
Department of Social Services  
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To the Department of Social Services,

We, the [Australian Orthotic Prosthetic Association \(AOPA\)](#) wish to provide feedback regarding the *consultation on draft lists of NDIS supports*. We take this opportunity to answer question three of the consultation paper; *do you have any further feedback or concerns with the draft NDIS support lists?*

### **Who we are and who we represent**

AOPA is the peak professional body for orthotist/prosthetists in Australia and is responsible for regulating the orthotic/prosthetic profession. AOPA is a full member of the [National Alliance of Self-Regulating Health Professions](#) (NASRHP) and is recognised by the Commonwealth Government as the assessing authority responsible for conducting migration skill assessments for orthotist/prosthetists. Orthotist/prosthetists assess the physical and functional limitations of people resulting from disease, illness, trauma and disability, including limb amputation, and neuromuscular conditions, such as stroke. Orthotic and prosthetic services may involve the provision of orthoses and prostheses to restore function, prevent deterioration, and improve quality of life.

### **We address the following draft support**

#### **Customised Prosthetics (includes Orthotics)**

Description: Prescription and manufacture of customised prostheses or orthoses requiring specialist skills.

### **Advantages of chosen wording**

We are pleased to see the addition of *(and orthotics)*, written beside the support *Customised Prosthetics*. To date, our practitioners observe prosthetic codes in plans when orthotic codes should be listed, and confusion from NDIA staff and plan managers on approved supports. We believe maintaining “*(and orthotics)*” is critical in the list of supports and will provide clarity to planners, NDIS delegates and staff, LACs, plan managers, participants and providers.

### **Unintended consequences of chosen wording**

We note only two (prescription and manufacture) of the six (assessment, prescription, manufacture, fit, review, report writing and education) activities required to provide orthotic

and prosthetic supports, are listed. By only listing two activities, there is a risk plan managers and NDIS delegates may only list/approve hours and supports for these two activities. Although we would hope this would be an unlikely scenario, current experiences with incorrect codes listed in plans suggests clarification is warranted.

### **Recommended wording**

We recommend wording that is both

- a) Specific to orthotic/prosthetic services, and,
- b) Aligns with other allied health supports (e.g. therapy supports) where appropriate.

We provide the following wording as a potential solution

**“Orthotic and prosthetic supports provided to assist a participant to access and/or improve participation and independence in daily activities in areas such as personal care, mobility and movement, interpersonal interactions, work and community living. This includes funding for assessment, prescription, manufacture, fitting, review, report writing and education by health professionals such as certified orthotist/prosthetists”**

AOPA would welcome future involvement in workshops, roundtables, and conversations. We look forward to working together with policy makers, legislators and persons involved in drafting the supports, to ensure it is fit for purpose and does not have unintended consequences for the allied health workforce, including orthotist/prosthetists.

We remain available for further comment.

Kind regards



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CEO AOPA