



Department of Social Services
Sent via: NDISConsultations@dss.gov.au

22 August 2024

To whom it may concern,

RE: Response to the consultation on draft lists of NDIS Supports

Speech Pathology Australia is the national peak body for speech pathologists in Australia, representing more than 15,000 members. Speech pathologists are university trained allied health professionals with expertise in the diagnosis, assessment, and treatment of communication and swallowing difficulties and as such provide crucial supports for NDIS participants.

We provide feedback on the proposed list of NDIS and non-NDIS supports in the following areas:

1. Exclusion of reasonable and necessary items
2. Concerns regarding therapy supports
3. Unintended exclusions & wording clarifications

Exclusion of reasonable and necessary items

Speech Pathology Australia has significant concerns regarding the exclusion of items that would otherwise meet reasonable and necessary criteria, however have been subject to 'pub test' type thinking ignoring the possibility of cost saving to the scheme. Whilst some items, such as online gambling are obviously inappropriate, there are others that are not so clear cut. Household items such as blenders for instance, may be necessary for some people with swallowing needs as a result of their disability to prepare food that is the right consistency for them to eat safely. This may in fact be a cost saving to the scheme, as it would be a one-off purchase that allows for a participant to be independent in preparing their meals, rather than having to purchase pre-made texture modified foods each week at a higher, ongoing cost. A blanket rule that specifies that household appliances are not NDIS supports does not allow participants to access certain items that have been recommended by a qualified speech pathologist or other allied health professional, that may be appropriate, cost saving and facilitate independence.

It is recommended that wording be amended to include provision for supports or items that are recommended by an appropriate allied health professional.

Concerns regarding therapy supports

Speech Pathology Australia has concerns regarding the unintended consequences that may transpire through a narrow interpretation of 'evidence based' therapy supports. Speech pathologists have the clinical skills to determine best practice for their therapy supports, and 'evidence based' may be based upon their clinical experience in conjunction with the participant's history and preferences¹. This may also be referred to as 'EB4' based upon the four aspects of evidence within the model of evidence proposed by Haynes et al. (2002)².

¹ [Evidence based medicine: what it is and what it isn't | The BMJ](#)

² [Physicians' and patients' choices in evidence based practice | The BMJ](#)

It has also been expressed directly to the NDIA, as well as the Research and Evaluation team that there may not always be direct research evidence in the form of research studies available. This is due to a significant history of people with disability being excluded from research studies.

In addition, the controlled nature of research variables mean that supports will have only been trialled with a certain type of person or family and should not actually be extrapolated to others who do not fit that exact criteria. For example, a therapy paradigm that doesn't allow for translation may have only been trialled with participants and families who speak English as a first language, and excluded people from a culturally and linguistically diverse background.

Finally, it must be acknowledged that it is not possible to label every support that a person might need; there needs to be trust in speech pathologists that are working within their scope of practice under the Code of Ethics (2020), specifically the principles of beneficence and non-maleficence.

We therefore recommend that wording be given to explain different types of evidence, and the notion that supports should only be recommended that are within an allied health professional's scope of practice, in accordance with their relevant professional obligations and codes of practice, conduct and ethics.

Unintended exclusions & wording clarifications

Speech Pathology Australia has concerns that by nature of a set list of included and excluded supports, several vital supports may be excluded as they are not specifically named. For example, whilst 'Communication and Information Equipment' is listed and 'Mobility aids' are listed, accessories, such as mounts and switches to have a communication aid be accessible for a wheelchair user are not listed in either category. If a specific list is to be provided, then wording must be provided to allow for the inclusion of these types of associated items. This is critical to enable a person to be able to utilise particular equipment or technology.

Similarly, whilst 'groceries' are considered a non-NDIS support, 'modified foods' are listed as an exemption, however the example given is of PEG feeds. Modified foods may also encapsulate texture modified foods and drinks, and these should also be included.

With regard to 'therapeutic supports', there is mention of 'health professionals' who would provide "further assessment...for support planning and review as required". It is unclear whether this refers to and includes allied health professionals and must be clarified that qualified allied health professionals can provide assessments related to therapeutic supports.

Speech Pathology Australia would be pleased to engage with the NDIA to improve health outcomes for people with disability. Please contact Dr Jennifer O'Connor, General Manager Policy, Advocacy and Government Relations on 03 9642 4899 or by emailing policy@speechpathologyaustralia.org.au if Speech Pathology Australia can assist in any other way or provide additional information.

Yours sincerely



Jodie Long
Chief Executive Officer