



Submission to

Your Experience of NDIS Support Rules (Support Lists)

Via web submission

23 July 2025

The Australian Music Therapy Association (AMTA) is Australia's peak body for music therapy. AMTA is the only government-recognised certifying body responsible for registering music therapists, accrediting music therapy courses, and maintaining professional standards, conduct and ethics. AMTA is a member of [Allied Health Professions Australia](#) and the [National Alliance of Self-Regulating Health Professions](#) (NASRHP). AMTA-certified registered music therapists (RMTs) are required to comply with strict [regulatory standards](#) established by NASRHP to ensure consumer safety. AMTA has [clearly defined membership criteria](#), [national professional standards](#) and assessment processes and a clearly defined [scope of practice](#).

AMTA plays a vital role in assuring music therapy quality and safety nationally, to promote the health, wellbeing, and functioning of Australians across the lifespan.

AMTA welcomes the opportunity to respond to the NDIS Supports rules consultation. Music therapy, delivered by AMTA-certified RMTs, has been included as an NDIS therapeutic support since the start of the NDIS. Like our allied health colleagues, RMTs provide capacity-building supports that improve participants' function, independence and participation.

AMTA notes and endorses the AHPA submission to this consultation.

Music therapy as a specialist support

In Australia, and as set out in NDIS policy guidance, **music therapy is delivered by registered music therapists (RMTs), who are registered with AMTA**. AMTA reminds the consultation team that music therapy is not a complementary or alternative therapy. More than listening to or learning music, RMTs design and deliver individualised and evidence-based music interventions that support areas including functioning, language and communication, interpersonal interactions, mobility and movement. For NDIS participants, music therapy addresses functional outcomes, supporting participants to increase their independence and community participation. AMTA again highlights the difference between music therapy and mainstream community supports (such as music lessons, or music for leisure), as well as non-evidenced alternative therapies (such as 'sound therapy'). We welcome the opportunity to work with NDIA to provide further education and/or information to clarify this distinction and the value of music therapy delivered by an AMTA-certified RMT.

Impacts of the support lists

AMTA strongly affirms the rights of participants to choose therapies and other supports that meet their needs and enable achievement of their individual goals and aspirations. The complexity of the supports lists can pose a barrier to independent decision-making and control by participants as they require what one music therapy participant referred to as 'bureaucratic literacy' to understand, interpret and navigate. This complexity causes unnecessary anxiety and uncertainty for participants, and can result in increasing conflict between participants and a loss of trust in the NDIS.

The prescriptive nature of the supports lists poses a potential risk to innovation as new approaches are developed or better supported by evidence.

Feedback on the implementation of the Support Lists

Participants also experience significant challenges with interpretation and implementation of the support lists. The intent of the NDIS rules (and legislation) are often lost when they are translated into practice at a local level and continue to be largely dependent on interpretation by NDIA Planners and Local Area Coordinators.

The interpretation and implementation of the supports lists is impacted by specific listing of only two allied health professions - speech pathology and occupational therapy – as examples of what can be funded. Correspondence from NDIA delegates indicate that the inclusion of these supports in the supports lists has been misinterpreted as implying the exclusion of other therapeutic supports. As a result, many participants are being denied access to music therapy (as it is 'not in the lists') and/or allowed restricted access to the two listed example therapies only. These listed therapies are often inappropriate for and not selected by the participant. We reinforce AHPA's recommendation that if an allied health professional, in consultation with the participant, deems a support reasonable and necessary and funding is available, the participant should be able to choose to access that support.

In the absence of a more flexible and enabling framework for supports, we strongly recommend the supports lists remove reference to selected allied health therapy examples and refer to approved Therapy Supports listed in the NDIS Pricing Arrangements and Price Limits (PAPL). The NDIA may need to develop an accessible version of the NDIS PAPL annually to support participants to understand their rights and options within the NDIS as they are updated each year. Clearer guidance in the lists will prevent future misapplication of policy, reducing distress to participants and costs of appeals. Since the implementation of the current Supports List, AMTA has received continued concerning reports that the list has created confusion in relation to the distinction between music therapy and music for leisure, or unevidenced, alternative therapies. Music therapy delivered by AMTA-certified registered music therapists is still an approved support in the NDIS and is included in the most recent PAPL.

Correspondence received by AMTA indicate that this confusion often leads to misapplication of policy, which can cause significant distress to participants, delays access to life-changing therapies and wastes time and resources in unnecessary complaints and appeals procedures.

Feedback on items included/excluded from current Support Lists

Musical Instruments - General

AMTA was disappointed to learn that musical instruments were listed on the 'exclusion' list. While typically considered a mainstream item, when prescribed by an RMT, musical instruments and music technology are therapeutic tools considered reasonable and necessary to address the NDIS goals of the participant. They are essential for building participants' capacity to generalise the skills learned in

therapy to their homes, schools, workplaces and in the community. They are not day-to-day living or lifestyle related expenses.

An important aim of the NDIS is to maximise participants' independence and reduce the need for supports over time. An RMT may therefore prescribe musical instruments or technologies (such as music-based mobile applications) to support the implementation of music therapy interventions outside funded therapy hours.

AMTA notes that in the exclusion list under *Carve outs that may be considered NDIS supports for certain participants that play equipment where it is specialist sensory equipment* may be funded if it relates to reasonable and necessary support. However, in practice, AMTA is unaware of any such carve outs being granted for musical instruments.

We therefore propose that this category include an additional carve out: *Musical instruments and musical technology when prescribed by a Registered Music Therapist*. The following evidence-based examples demonstrate instances where this carve out may be applied:

Example 1: For someone with limited upper limb movement, working on fine motor skills to increase independent living (e.g. using knife/fork, driving), the mobile app 'Thumb Jam' has been found to be an effective way of building functional upper limb movements¹

Example 2: The neurologic music therapy method 'Therapeutic Instrument Music Performance' (TIMP), which can include therapeutic training in piano/electronic keyboard, has been found to improve functional movement in grip strength, finger independence and fine/gross motor for adolescents with Cerebral Palsy²

AMTA highlights the use of musical instruments and technology in music therapy as methods for alternate communication and as assistive equipment with capacity building benefits. These capacity building benefits include increased communication, interpersonal interaction, self-expression and co-regulation through music therapy based approaches.

We note that the *Communication and Information Equipment* category describes *products to assist with alternate communication*. In this category, there are no specific products or items listed as 'carve outs that are not NDIS supports'. We therefore query why musical instruments and music production have been 'carved out' for exclusion when there are clear therapeutic benefits that can be linked to funded supports.

AMTA recommends the inclusion of musical instruments and music technology on the funded NDIS supports list. These should be funded only when prescribed by a registered music therapist as part of a participant's funded therapeutic supports.

Adaptive Musical Instruments

AMTA notes the category *Assistive Equipment for Recreation*, includes *specialist products used in competitive and non-competitive sports and other recreational pursuits*. However, 'other recreational activities' are not specified. While not disallowed, adaptive musical instruments are frequently rejected due to lack of clarity in these guidelines. Many disabled musicians require adaptive instruments to develop or maintain their musicianship (recreationally and in some cases, professionally)^{3, 4}. Therefore, it should be made clear that adaptive musical instruments are available through the supports list, in the same way that sports-related products are clearly listed.

General feedback and concerns

AMTA notes that in the past, many responses to consultations have remained unheard and unresolved. We have raised our priorities and concerns with successive ministers and the NDIA, both in person and via numerous prior submissions. We trust that this consultation is genuine and hope that any further recommendations for change will be proposed and consulted on before they are presented as final for implementation.

Contact us

Registered music therapists (RMTs) are allied health professionals who use evidence-based music therapy methods, techniques and approaches to deliver benefits to people across Australia. AMTA welcomes enquiries about how registered music therapists are uniquely qualified to use music as a therapeutic tool and deliver positive outcomes with NDIS participants. We would welcome a discussion to provide more information about how our members support NDIS participants across Australia.

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References

1. Silveira, T., Tamplin, J., Dorsch, S. & Barlow, A. (2018). Let's Improvise! iPad-based music therapy with functional electrical stimulation for upper limb stroke rehabilitation. *Australian Journal of Music Therapy*, 29, pp.1-16
2. Dogruoz Karatekin B, Icagasioglu A. The effect of therapeutic instrumental music performance method on upper extremity functions in adolescent cerebral palsy. *Acta Neurol Belg*. 2021 Oct;121(5):1179-1189. doi: 10.1007/s13760-021-01618-0. Epub 2021 Feb 15. PMID: 33590470; PMCID: PMC7883946.
3. Skinner, A., Thompson, G., & Skewes McFerran, K. (2022). Professional Pathways for Musicians with Disability in Victoria, Australia. *Musicology Australia*, 44(1), 21–42. <https://doi.org/10.1080/08145857.2022.2088930>
4. Chapin, Cheyanne Maria, "Adapting instruments, not students: A study of adaptive musical instruments" (2020). Honors Program Theses. 430. <https://scholarworks.uni.edu/hpt/430>