



2023-24 NDIS Pricing Review

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SUBMISSION

2023-24 NDIS Pricing Review

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MS Australia is Australia's national multiple sclerosis (MS) not-for-profit organisation that empowers researchers to identify ways to treat, prevent and cure MS, seeks sustained and systemic policy change via advocacy, and acts as the national champion for Australia's community of people affected by MS.

MS Australia represents and collaborates with its state and territory MS Member Organisations, people with MS, their carers, families and friends and various national and international bodies to:

- Fund, coordinate, educate and advocate for MS research as part of the worldwide effort to solve MS
- Provide the latest evidence-based information and resources
- Help meet the needs of people affected by MS

Multiple Sclerosis (MS) is the most acquired neurological disease in younger adults around the world with over 2.8 million people affected. More than 33,300 Australians live with MS and over 7.6 million Australians know someone or have a loved one with this potentially debilitating disease.

Symptoms vary between people and can come and go; they can include severe pain, walking difficulties, debilitating fatigue, partial blindness and thinking and memory problems. For some, MS is characterised by periods of relapse and remission, while for others it has a progressive pattern of disability. MS robs people of quality of life, primarily driven by the impact of MS on pain, independent living, mental health and relationships.

2023-24 NDIS Pricing Review

MS Australia welcomes the opportunity to make a submission to the 2023-24 NDIS Annual Pricing Review. Over the past nine years, MS Australia has actively advocated on behalf of people living with MS for improvements to the NDIS.

We have drafted a range of submissions relating to the NDIS, including four submissions to the *NDIS Review*:

- [Submission to the NDIS Review](#) – December 2022
- [NDIS Quality & Safeguarding Framework](#) – May 2023
- [Pricing & Payment Approaches in the NDIS Market](#) – July 2023
- [What we have heard report – submission on solutions](#) – August 2023

This submission draws on the experiences and expertise of MS Australia's state and territory Member Organisations. These Member Organisations are registered NDIS providers and deliver a range of supports and services to people living with MS including support coordination, plan management, allied health, accommodation, respite, social support and in-home care. Some Member Organisations also support people living with other neurological conditions including stroke, Parkinson's disease, Huntington's disease, acquired brain injury and Motor Neurone disease.

MS Australia and our Member Organisations want to ensure that we provide the highest level of service to people living with MS and support them to live with dignity and respect. An effective and appropriate *NDIS Pricing Controls Framework* is an integral part of this work.

MS Australia makes the following recommendations:

MS Australia Recommendations

A review of the pricing for therapy supports including:

- An increase to match current salaries on offer in the allied health industries
- Consistency in pricing in WA, SA, Tasmania & the NT to match the current gap in physiotherapy pricing versus other allied health pricing
- A separately funded category for allied health travel costs including an allied health travel budget for participants
- Removing travel caps for services provided in MMM4 & MMM5 regions and allowing the actual cost of travel to be charged

A review of support coordination and plan management to ensure that:

- NDIS plans include the appropriate number of support coordination and plan management hours to meet participants needs and allow for associated administrative, problem solving and compliance work
- Pricing takes into consideration the actual costs of hiring staff under the SCHADS Industry Award
- Pricing is indexed annually and incorporates increases in the cost of living
- Participants do not have a reduction in their support coordination hours in their plans unless requested by the participant
- NDIA planners adhere to professional advice relating to the level of support coordination required by participants

- The administrative burden associated with support coordination and plan management is reduced
- Planning, approval and review processes are improved to reduce the unpaid advocacy burden on providers.

Therapy supports

For people living with MS, access to allied health and therapeutic services and supports are essential to maintaining health and wellbeing and slowing disability progression. This includes physiotherapy, occupational therapy, dietetics and exercise physiology to improve mobility, balance and strength; manage fatigue, maintain independence; improve nutrition, manage bladder and bowel issues and to prevent symptoms from worsening over time.

NDIS therapy supports have not been reviewed for at least three years and do not match the current rate of salaries in the allied health industries. Our Member Organisations advise that in the past 12 months they have had to continually review and update salaries to attract and retain staff. Any gap between the cost of hiring allied staff and NDIS pricing is being met by the providers who as a result are operating at a significant loss. Additionally, in WA, SA, Tasmania and the NT the rate paid for physiotherapists is higher than for other allied health professions (\$193.99 vs \$224.62). This significant gap in rates makes it difficult for our Member Organisations to offer competitive salaries to other allied health professionals.

Since allied health supports are often delivered face-to-face, travel costs take up a significant portion of the costs associated with delivering these supports. As a result, a substantial portion of the approved hours in a participant's plan may be used for travel costs instead of therapy supports. Introducing a separate category for allied health travel would enable allied health professionals to travel to participants without using therapy support funding. Participants would have a separate therapy budget allocation in their plan. Delivering therapy supports to clients in rural and remote locations attracts considerable travel costs that are not met by the current pricing. Given these increased and unpredictable costs, the NDIS pricing should allow for providers to charge the actual cost of travel.

Our Member Organisations are reporting that the increase in mandatory training requirements has added to the costs of maintaining staff. This is further exacerbated by a constant turnover of staff and the need for constant training of new staff. The costs of training and maintaining a NDIS workforce should also be taken into account.

MS Australia recommends a review of the pricing for therapy supports including:

- An increase to match current salaries on offer in the allied health industries
- Consistency in pricing in WA, SA, Tasmania & the NT to match the current gap in physiotherapy pricing versus other allied health pricing
- A separately funded category for allied health travel costs including an allied health travel budget for participants
- Removing travel caps for services provided in MMM4 & MMM5 regions and allowing the actual cost of travel to be charged

Support Coordination

Support coordination and plan management are important components of the NDIS and provide participants with crucial support in coordinating supports and services and managing their plan. For many people living with MS, brain fog, memory and fatigue issues make it difficult to manage their plan and coordinate services. Additionally, the complex nature of the NDIS system makes it difficult for people living with MS and their families to navigate services and providers. Access to ongoing support coordination and plan management ensures they can access the services and supports they need and manage interactions with providers. These services are especially important for people who have no carer or informal support network.

Feedback from MS Australia Member Organisations is that the delivery of both support coordination and plan management services involves many additional unfunded staffing hours. The coordination of services and management of plans take substantially more time than current NDIS pricing allows for.

As outlined in our submission to the NDIS Review, the limited understanding by NDIA staff of neurological conditions leads to ineffective planning sessions, inconsistent plans that do not address their needs and unnecessary reassessments or plan changes. There is also a lack of understanding about the importance of access to coordination of supports for people living with MS. As a result, our Member Organisations spend considerable unpaid staffing hours providing increased advocacy and support for clients living with MS. This includes supporting clients to navigate the planning and review process, increased funding for plans and ensuring clients are approved for the services they need, providing additional documentation to the NDIS and supporting clients through appeals. Member Organisations have also reported frequent requests from the NDIA Compliance Team for claim reviews with no offer of additional remuneration or support. The introduction of the NDIA's new portal PACE also requires regular liaison with the Agency to resolve payment and system issues.

Additionally, our Member Organisations have observed that over the last 12 months, support coordination hours are frequently reduced in participants' plans, contrary to professional and end-of-plan report recommendations. This reduction not only adversely affects the quality of the funded service provided but also increases unfunded support requirements, which results in a negative financial impact to the provider.

Our Member Organisations advise that the salaries for staff delivering support coordination have been steadily rising over the last few years, with no increase in the relevant pricing to match this. An example of the increased costs of support coordination for one of our Member Organisations is below:

Example

MS Plus provides services to people living with MS in NSW, ACT, Victoria and Tasmania.

Salaries for Support Coordination increased by 4.6% in 2022-23, with no indexation, followed by a 5.75% increase in the current financial year 2023-2024, also without indexation. At the same time minimum Award increases for staff have seen salaries rise at 8% over the same period.

The Support Coordination services continues to run at a lost that is funded by MS Plus.

MS Australia recommends the NDIS review support coordination and plan management to ensure that:

- NDIS plans include the appropriate number of support coordination and plan management hours to meet participants needs and allow for associated administrative, problem solving and compliance work
- Pricing takes into consideration the actual costs of hiring staff under the SCHADS Industry Award
- Pricing is indexed annually and incorporates increases in the cost of living
- Participants do not have a reduction in their support coordination hours in their plans unless requested by the participant
- NDIA planners adhere to professional advice relating to the level of support coordination

required by participants

- The administrative burden associated with support coordination and plan management is reduced
- Planning, approval and review processes are improved to reduce the unpaid advocacy burden on providers.

