

Early Childhood Intervention Australia Victoria /Tasmania Submission to NDIA Annual Price Review 2023

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Introduction

Early Childhood Intervention Australia Victoria/Tasmania (ECIA VIC/TAS) welcomes the opportunity to provide input into the National Disability Insurance Agency's annual review of pricing. This submission will address key NDIS pricing concerns from the perspective of the early childhood intervention sector and our members.

ECIA VIC/TAS is the peak body for early childhood intervention in Victoria and Tasmania. We represent over 800 professionals and organisations providing specialised support and services for infants and young children with disability and/or developmental delay to promote development, well-being and community participation. Our vision is for young children of all abilities to fully participate in family and community life. We provide advocacy, information and professional development across the sector.

ECIA VIC/TAS members are early childhood intervention (ECI) professionals working in community organisations, disability services, specialist ECI organisations, children's services agencies and government departments reflecting the diverse ways in which these services are provided to young children and their families. Our members implement a best practice approach to early childhood intervention which is outlined in the National Guidelines for Best Practice in Early Childhood Intervention (ECIA 2016).

The current NDIS Pricing Guidelines is based on a one size fits all approach, rather than acknowledging the unique and critical periods of development within the early years. The notion that a Price Guide should be consistent across the lifespan (birth to age 65 years) inevitably emphasizes an adult-centric approach and is at odds with best practice in early intervention for children and their families.

ECIA VIC TAS acknowledges that the current funding approach may be adequate to support the delivery of services in a centre-based setting provided by a standalone private practitioner perhaps, it is not however, adequate to support the provision of best practice in early intervention. The current price limits for therapy supports have not kept pace with financial climate and are unsustainable to provide a viable best practice service.

What has been the main cost driver in delivering NDIS therapy supports over the past year? Is this different to the past few years?

Increase Cost to Deliver Therapy Supports:

ECIA VIC/TAS members have reported that their operational costs have significantly increased (up to 35%) since the last price increase in 2019. The continued constraint of the hourly rate for therapy services, with having no increase for three years, is out of place in a high inflation environment.

The current core inflation of around 7.8% has led to increased interest rates, which will further flow through into increased costs. An unchanging hourly rate for therapy services in a high inflation environment combined with increased staff costs will undermine the quality of services or the viability of services, or both.

ECIA VIC TAS members report that in the last 12 months they have experienced an untenable increase in their cost of supports. In large part this is due to:

- CPI increases
- Reimbursement for travel increasing 15% (HPSS award)
- 0.5% superannuation guarantee increase
- New Fair Work Commission Secure Jobs Better Future entitlements for 10 days paid family and domestic violence leave
- Cost of implementing psychosocial health and wellbeing initiatives to meet new obligations for providers under OH&S legislation
- Increased energy prices
- Increased insurance premiums
- Compliance requirements and maintaining registration
- Ongoing impact of COVID-19 - The workforce in the NDIS for children was significantly impacted by COVID-19 and organisations were required to respond to its challenges without support from the NDIA
- Salary expectation of therapists/early childhood educators is placing ongoing pressure on the market

Critical Workforce Shortages:

There continues to be issues in both the retention and recruitment of staff in NDIS services for children. The instability in the workforce requires ongoing and increasing investment in staff development and support. The length of experience of therapists/early childhood educators continues to decrease and the increase in new graduates entering the sector requires a significant increase in on-boarding and training costs. Staff working in natural settings, individually in family's homes need a high level of proficiency and/or a high level of support until they become proficient or there will be poor outcomes for children and families.

It takes minimally 12 months for a new graduate therapist/early childhood educator to meet the NDIS Quality and Safeguarding requirements and to upskill clinically, in order to meet the complex needs of working alongside vulnerable families.

Additionally, providing supervision, which is a mandatory requirement set by AHPRA and other professional bodies, is a vital part of attraction and retention to the NDIS sector, however current therapy pricing does not recognise this specialist skill and the supervision requirements.

There is no long-term proposal to resolve the workforce situation for NDIS services for children, either through support to increase the availability of suitably trained therapists/early childhood educators or recruiting overseas. This means individual ECI organisations are required to meet the additional costs of workforce shortages.

Complex Needs and Family Vulnerability

ECIA VIC/TAS members report an increase in the presentation of families with multiple and complex needs, which in some part is a consequence of COVID-19 and the current cost of living crisis. Up to 70% of the clients that our members work alongside could be seen as complex and require a high level of additional unfunded support.

Unfunded additional activities that are not billable include:

- Responding to families in crisis and disclosures
- Assisting families to navigating the complex NDIS pathways
- Assisting with referrals to support family members (i.e. siblings) who are not NDIS participants
- Involvement in subpoenas and family law court proceedings
- Child protection referrals, attendance at case conferences/care team meetings
- Mandatory reporting requirements - complying with Child Safe Standards, MARAM and Child Information Sharing Schemes

Conclusion

Investing in the delivery of best practice early childhood intervention services will ensure the best possible outcomes for children with disability and/or developmental delay and their families. Investing early has significant health, well-being, educational, social and employment outcomes for children and families, and this in-turn will ease demands on the NDIS in the long term.

The current NDIS funding model does not support best practice in early intervention and has a direct negative impact on quality service provision. The capped pricing on therapy supports, increased cost drivers, workforce issues and the growing complex nature of working alongside vulnerable families are placing unsustainable pressure of ECI Providers to continue to provide quality early intervention supports.