

I run a sole trader Private Physiotherapy practice working with children in the south eastern suburbs of Melbourne. I have worked with children for over 20 years- at Royal Children's Hospital, Disability Organisations (NGOs), schools, early intervention, community health and private practice.

I would like to make a submission about the Transitional Arrangements for NDIS, in particular Terms of Reference b: delivery of NDIS and other services for people with a disability in Australia.

The NDIS promotes Choice and Control for participants. I am interested in the development of the National Approach to the Registration of Providers for Early Childhood Supports. The current state based approach in Victoria is inequitable and favours existing Providers. I am concerned that the current registration requirements for this support category do not allow participants choice and control.

I am a Better Start Provider in Victoria. The registration for Better Start was reasonably straight forward and not unreasonably demanding in the time required. Because I was not registered for Better Start before July 2016, I am considered a new provider for the purposes of NDIS registration. To register for NDIS Early Childhood Supports as a new Provider is overly onerous, particularly for sole traders and small organisations. Currently in Victoria I need to register with DHHS as a Provider which involves development of many, many policies. Many of these are not relevant to my practice. I also need to self assess against the Early Childhood Intervention Association (ECIA) standards. Within 18 months of registration I will need to have an independent audit at my own cost. So for those Providers who were already Better Start Providers before July 2016, the process is completely different. They transition smoothly across to become NDIS providers.

I do not believe this process is fair. There is no taking into account a Provider's experience within another organisation when considering whether they are an existing or new Provider. There is no taking into account quality Professional Development they have completed. I can work at an NGO providing Early Childhood Supports but can't work in my own practice, even though I am the same person with the same background and experience. In NSW the requirement to register with the state government was removed for Early Childhood Supports. I believe this is a fair and equitable arrangement.

I am concerned what the National Guidelines for registering in this category will require. If the National Guidelines require something similar to the state government registration- this will deter sole traders and small providers. There will be a loss of choice and control for participants.

I have made enquiries as to approximate cost for the independent audit required for state registration. I am unable to access this information. Anecdotally reports suggest that the cost of this runs into several thousand dollars. I need to make a business decision about whether I can absorb the costs associated with registration for NDIS. It is difficult to do this when I can't determine roughly what these costs will be. Many of my colleagues have decided not to register as the process is too onerous. Where is the choice and control for participants if mainly large organisations can register but the process is putting off smaller, quality providers. Families with children with a new disability are often overwhelmed and distressed. They are unlikely to self

manage or be plan managed as they are overwhelmed with day to day life. Many families will be NDIA managed and limited to registered Providers.

I have registered for Therapeutic Supports for NDIS. To register in this category I needed to upload evidence of AHPRA registration. Therapeutic Supports allows me to provide Physiotherapy for participants over the age of 7 years old. Why is it that to provide Physiotherapy for children aged 0-6yo that I need to register with a government department and develop a multitude of policies and procedures which have never been required before? I understand that Early Childhood Supports require an understanding of Family Centred Practice, Child Development and how to engage with families. Transdisciplinary practice is different from the individual approach for older children and adults. But I don't see how the registration process with the Victorian Government makes me a better therapist for young children. It doesn't!! I have no issue with the self assessment against the ECIA standards. I think that's a good idea.

It would make sense to me if the National Guidelines for Early Childhood Supports took into account the experience of a therapist across organisations/ their working life and the professional development specific to this area. I don't think it's relevant to expect a sole trader to fulfil the same criteria as accommodation services and day services.

It is not clear to me, once the National Guidelines are developed, whether every provider will need to register again or whether existing providers will transition straight across. Because of the inequity of the current system, I hope current Providers will not transition straight across. I hope the National Guidelines are reasonable and take into account the variety of Provider types who would like to access the NDIS and who will contribute to the quality of the scheme. Disability Services Consulting is an effective advocate for large Providers. Who is looking after the interests of small providers and ensuring they are not shut out of the process?

Like many of my colleagues- I work part time for an organisation and part time in private practice. I hope to be a Provider under NDIS for young children as I love this area of work and have years of experience. I will be interested to see what the process involves once the National Guidelines are developed and this will inform whether it will be viable for me to work in this area or not.