



The Hon Jane Prentice MP
Assistant Minister for Social Services
and Disability Services
Federal Member for Ryan

MC17-000879

Ms Janie Thompson
President
Continence Nurses Society Australia
PO Box 3207
MURRUMBEENA VIC 3163

Dear Ms Thompson

Thank you for your letter of 20 August 2017 regarding provider concerns about continence assessments and rebates under the National Disability Insurance Scheme (NDIS). I note you have also written to the Minister for Social Services, the Hon Christian Porter MP. I am responding to you, as I have portfolio responsibility for the matter you have raised.

The initial assessment and treatment of a person's continence requirements are primarily the responsibility of the health system, as you note in your letter. The National Disability Insurance Agency (NDIA) acknowledges the important role that medical and, if appropriate, surgical personnel and the use of diagnostic testing have in addressing underlying health and other clinical factors associated with incontinence.

Once it is clear that ongoing continence management is required, the NDIA will consider the appropriate reasonable and necessary funding to assist a participant to manage those disability related support needs and any non-clinical elements of their continence management. A continence assessment (undertaken by a suitably qualified continence nurse) to determine the level of consumables and other appropriate supports that a participant requires can be funded through a participant's plan. The NDIA has provided an assessment template on the Assistive Technology section of the NDIS website to assist in the provision of this advice.

Under the NDIS, the appropriate support line item within the Community Nursing Care registration group for continence nursing assessments and management is *Continence aids: Assessment recommendation and training delivered by a nurse, hourly rate \$95.77*. One of the issues you raise in your letter is that this support item can be delivered by welfare workers; however this is not the case. Welfare workers are not a listed profession within the Community Nursing Care registration group. This is confirmed in the current *Provider Toolkit Module 4: Guide to Suitability* on the NDIS website. In the *Provider Toolkit Module 4: Guide to Suitability* the only profession listed for the Community Nursing Care registration group is Registered Nurse.

You also note that the NDIA appears to have a negative bias towards nurses by inconsistently aligning maximum price limits to Transport Accident Commission pricing. While the NDIA may use benchmarks from other schemes, the setting of price controls and participant budgets is based on a range of other considerations, including the specific support needs of people with disability, and the nature of markets for disability supports. The two examples you noted (Occupational Therapist and Physiotherapist) are not related to continence supports, and have been determined based on considerations relevant to the market for those supports in an NDIS context. Therefore, the figures presented in this table support the view that the NDIA is setting price controls that reflect best practice service delivery in each case.

The NDIA is consistently seeking to improve its processes. In June 2017, the NDIA's Board and Management commissioned McKinsey & Company to undertake an Independent Pricing Review (IPR). The IPR was established in response to the wide range of issues raised in the NDIA's 2017-18 Price Review, the Participant and Provider Workshops, and the Productivity Commission submissions. Should you wish to participate in this review, details are available at ndis.gov.au/news/pricing-provider-forums or by emailing independentpricingreview2017@mckinsey.com.

Yours sincerely

A handwritten signature in blue ink that reads "Jane Prentice". The signature is written in a cursive style with a large loop at the beginning.

JANE PRENTICE

Assistant Minister for Social Services and Disability Services

13 SEP 2017