

Karen Hooper
Principal Commissioner
Queensland Productivity Commission

Via email: enquiry@qpc.qld.gov.au

3 February 2021

Dear Dr Hooper

Re: Inquiry into the NDIS Market in Queensland

The Queensland Division of Occupational Therapy Australia (OTA) welcomes the opportunity to respond to the Queensland Productivity Commission's (QPC) draft report on the Inquiry into the National Disability Insurance Scheme (NDIS) Market in Queensland.

OTA is the professional association and peak representative body for occupational therapists in Australia. As of October 2020, there were more than 4,700 registered occupational therapists working across the government, non-government, private and community sectors in Queensland. Occupational therapists are allied health professionals whose role is to enable their clients to engage in meaningful and productive activities.

Role of occupational therapists in the NDIS

Occupational therapists work with people with disability and their families to maximise outcomes in all life domains, including Activities of Daily Living (ADLs), social and community participation, work, learning, and relationships.

Occupational therapists are uniquely skilled in assessing the degree to which a person's disability affects their ability to perform everyday activities. Based on these assessments, occupational therapists recommend, implement and monitor interventions aimed at improving a person's functional capacity.

Given their expertise and area of practice, many occupational therapists deliver services to NDIS participants. This includes, but is not limited to, functional capacity assessments, home modifications, assistive technology prescription, Positive Behaviour Support services and a range of interventions to promote independence and participation.

Workforce Shortages – AHAs and New Graduates

OTA acknowledges that shortages of skilled allied health professionals – particularly in rural, regional and remote Queensland – remain a key barrier to market stewardship of the NDIS.

We strongly support the Commissioners' recommendation that the Queensland Government fund a pilot to better understand the role of AHAs in the context of disability services. As observed by the Commissioners, this may alleviate pressure on the overstretched allied health workforce, enabling them to prioritise those services which best utilise their high level of expertise where it is most needed.

OTA notes, however, that AHAs should be appropriately qualified, deployed and supervised. Under no circumstances should an AHA undertake an occupational therapy-related task for which they are not trained or without the supervision of a registered occupational therapist. OTA has a position paper on the appropriate role of AHAs in supporting occupational therapy practice, which I attach for your reference. We would welcome the opportunity to participate in the design and implementation of the proposed AHA pilot.

To support a highly skilled allied health workforce, the Queensland Government must also ensure new graduate occupational therapists are appropriately supported and supervised to build their expertise.

OTA is aware of growing concerns around some new graduates being recruited by large, multidisciplinary NDIS providers where they sometimes have limited access to discipline-specific supervisory structures and supports. Without this, it is difficult for new occupational therapists to develop their clinical skillsets and provide the “specialised therapeutic supports” which the QPC has identified as undersupplied in the current market.

OTA would welcome consideration of this issue in the Commissioners’ final report.

Recommendation 1: That the final report reflect the need to support an expanded allied health workforce, including by enhancing pathways for new graduate occupational therapists to receive adequate supervision and develop their clinical skills in the NDIS.

Recommendation 2: That OTA be engaged in the design and implementation of the proposed AHA pilot, and that any future guidelines be consistent with OTA’s Position Paper on the role of AHAs in supporting occupational therapy practice.

OTA thanks the Commissioners for the opportunity to comment on their draft report. Please note that representatives of OTA would be pleased to expand upon any of the matters raised in this submission.

Yours sincerely



Brooke Carter
Queensland Divisional Manager