

PRINCIPLES TO GUIDE A NEW NDIS PRICING FRAMEWORK IN THE EARLY CHILDHOOD INTERVENTION SECTOR.

INTRODUCTION AND PURPOSE

The Early Childhood Intervention Best Practice Network is submitting a response to support a fresh approach to *NDIS pricing - exploring opportunities for pricing reform*. The response reflects the experience of children/families receiving and providers delivering Early Childhood Intervention under the NDIS.

Summary of recommended principles to guide a new NDIS pricing framework in the early childhood intervention sector.

Overarching statements:

- Changes to pricing on its own *cannot* improve outcomes for participants, create a sustainable NDIS and importantly protect the rights of individuals to safe, quality services. Pricing should
- Pricing has the capacity to help:
 - improve quality and safeguards and outcomes, and trust in the NDIS; or
 - inversely limit the outcomes from supports and increase the risks to participants.
- Any changes to NDIS pricing should occur in line with, and continue to adapt, as evidence-based practices, quality and safeguards, legislation and registration system changes related to NDIS are released. See Appendix (1) (2).
- Processes involved in setting pricing needs to be independent, representative of the voices of participants and providers, and transparent, in order to improve the trust of participants and families, in providers and the NDIS.

If communications about pricing structure is not consistent and if pricing do not coincide with other reforms, then choice, innovation and quality will be negatively impacted. Inconsistencies in frameworks and communications leads to lack of clarity, confusion, misinterpretation and loss of trust in the NDIS.

Pricing principles for children receiving NDIS services to ensure a child's right to quality and safeguards:

Price Early childhood Intervention:

- To "pay what it takes" [Paying what it takes report - Social Ventures](https://www.ndiscommission.gov.au/rules-and-standards/ndis-practice-standards/supplementary-module-early-childhood-supports) to deliver services that meet the Early Childhood Supports National Quality and Safeguard standards <https://www.ndiscommission.gov.au/rules-and-standards/ndis-practice-standards/supplementary-module-early-childhood-supports>.
 - The child
 - The family
 - Inclusion

- Collaboration
 - Capacity building
 - Evidence-informed practice
 - Outcome-based approach
- Recognising the full range of professionals who deliver early childhood intervention in each state i.e.
 - Early Childhood Supports - Early Childhood Professional
 - Developmental Educator
 - Early Childhood Teacher or Educator
 - Occupational Therapist
 - Social Worker
 - Speech Pathologist
 - Physiotherapists
 - Other professional
 - As well as direct service provision, these support items can be used to claim for:
 - Non-Face-to-Face Support Provision
 - Provider Travel
 - Short Notice Cancellation – 2 clear business days
 - NDIA Requested Reports
 as well as:
 - Clinical supervision in early childhood intervention practices
 - “Team Around the Child” collaboration
 - Ongoing reports to support:
 - assessment and intervention outcome monitoring
 - inclusion in the community, early childhood education, school and home
 - child protection and safety
 - family capacity building and support.
 - In ways that support and incentivise participants to use service delivery approaches that meet the “Outcomes” of all the National Quality and Safeguard standards including the Early Childhood Supports ie. quarantine funding for:
 - Travel to promote family-centred practices and inclusion,
 - A key worker
 - Capacity building group programs and
 - Collaborative practice.
 - Mandate compliance with National Quality and Safeguard standards, including the Early Childhood Supports, for all providers, through registration processes, using independent auditors, that demonstrate workforce competencies and practices that meet the Best Practice Guidelines in Early Childhood Intervention Ref: https://www.preci.org.au/wp-content/uploads/2023/12/National-Guidelines-for-Best-Practice-in-ECI_2016.pdf.

If these principles are not observed, opportunities for choice of services by children and families, innovation, safety and quality will continue to be restricted.

Improving outcomes for participants: Incentivising services that meet the Best Practice Guidelines in Early Childhood Intervention:

Changing the structure of the price guide can encourage use of funding that meets the Best Practice Guidelines in Early Childhood Intervention.

A restructure of the funding should provide separate 'buckets' of funding for:

- Travel – so families will not see these costs as reducing their funding for face-to-face direct services and will be encouraged to use this funding and access services in natural settings (home, early childhood centres, schools, community activities and spaces).

The “funding bucket” for travel for children located in rural and remote areas needs to be larger than those who reside in metropolitan areas.

- Key Workers – so families will not see this as reducing their direct / therapy services and will be encouraged to invest in planning for life and learning, capacity building for themselves, developing a Team around their Child, supporting inclusion in (home, early childhood centres, schools, community activities and spaces), and supporting their child through life transition points.
- Capacity Building – so families will not see this as reducing their direct / therapy services and will be encouraged to use this funding to learn how to support their child in everyday environments and build their own skills and skills of those who support their child.
- Family Supports – so families will not see this as reducing their direct / therapy services and will be encouraged to access family therapy, including siblings. This will improve the wellbeing and connectedness of all family members as well as provide emotional support for family members to manage daily life with a family member with a disability/delay.
- Collaboration and a Team Around a Child – so families will not see this as reducing their direct / therapy services and will be encouraged to take up opportunities to bring team members together for joint planning, capacity building and goal setting and evaluation.
- Inclusion - so families request providers to undertake services that build the capacity of agencies to meaningfully include children, the families themselves to support their child's inclusion, and children to develop their skills to play, learn, and make friends.

If pricing is itemised and quarantined, NDIS planning processes will need to meet these standards, families will be incentivised to use the funding, and plan managers and support coordinators will accept services that reflect best practices.

Restructuring of the Price Guide to promote Best Practices in Early Childhood Intervention:

The following information has been taken directly from the Early Childhood Intervention Best Practice Network NDIS Review Questions Response White Paper written in August 23 which provides further background relating to the above:

GOOD SUPPORT MEANS THAT THE ‘BEST PRACTICE GUIDELINES IN EARLY CHILDHOOD INTERVENTION’ ARE EMBEDDED ACROSS ALL EARLY CHILDHOOD INTERVENTION SUPPORTS AND SERVICES.

Best Practice	Solution	How
Supports delivered to children in natural settings	Incentivise providers to deliver, and families to request, services in natural settings i.e. home, community, early childhood education settings and school so that families are happy to pay for travel: The cost of travel is seen as ‘reducing’ their ‘therapy budget’ and therefore, families opt for clinic-based models. Help families to understand routine-based support in natural setting is an evidenced-based practice as it improves their child’s service outcomes and supports inclusion.	Create a travel pricing line that is quarantined and matches the number of hours needed in the home/community. Families can use funds flexibly for travel if they need more out of other funding budgets.
To appoint a Key Worker to work with a family and promote collaboration and “Team Around a Child.”	Incentivise providers to deliver, and families to request, services that share and plan together so that families do not see that this cost is ‘reducing’ their ‘therapy budget’ but see that it will improve their service outcomes and help families to understand the value of Key Workers.	Create a “Team Around the Child” pricing line that is quarantined and matches the number of hours needed to meet as a collaborative team.
To focus on ‘capacity building’	Incentivise providers to deliver, and families to request, services that help family members learn new skills that will support their child, understand that it is value for money and that it will improve their service	Create a pricing line for services that provide training to parents and carers (that builds parent and carer capacity to provide early childhood intervention supports), that is quarantined and

	outcomes. Help families to understand the value of capacity building and prioritise therapeutic interventions solely for the children.	matches the number of hours needed for these programs and for follow up.
To support the family unit	Incentivise providers to deliver and families to request services that build resilient families as they are often reluctant to use funding on family support as it is seen as 'reducing' their 'therapy budget'.	Create a pricing line for services for family members that is quarantined and matches the number of hours needed, based on the needs of the child and their family.

The ECI Best Practice Network

The ECI Best Practice Network is a group of 20 not-for-profit Early Childhood Intervention providers, based in NSW, Victoria and the ACT who collectively prepared this submission on a voluntary basis. The submission focusses on solutions for the challenges currently facing children, families, and registered NDIS Providers. For a full report about how pricing fits into our responses to the NDIS Review please go to the Network's original NDIS Review Discussion Paper submitted in March 2023 which can be found at: [DISCUSSION PAPER EARLY CHILDHOOD INTERVENTION](#)

We are informally calling our network the Early Childhood Intervention (ECI) Best Practice Network. The paper was intended to help inform policymakers and decision-makers regarding observations 'on the ground' from a provider perspective.

Early Childhood Intervention (ECI) Best Practice Network is focussed on improving the lives of children and their families and creating and maintaining a robust, sustainable system NDIS system.

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Appendix:

Note (1): The Early Childhood Targeted Action Plan action 2.4 Review of best practice in early childhood intervention is due to be released by July 2025. This will lead to changes in service practices by the Early Childhood sector. [Best Practice Framework for Early Childhood Intervention. – Preci Australia](#)

Note (2): A recent example of how inconsistencies across NDIS leads to misinterpretation, is the new NDIS List of Supports

<https://ourguidelines.ndis.gov.au/media/1768/download?attachment> which says that

- no parent training or supports for education are included as NDIS supports; and
- fails to list Educators/Early Childhood Teachers, with only specific mention of allied health professionals.

The wording in the NDIS List of supports states:

“This includes:

- *therapy provided by allied health professionals including speech pathologists and occupational therapists*
- *a key worker for a child’s family.”*

The wording in the NDIS List of supports is unclear and does not reflect what is documented in the NDIS Pricing Arrangement and Pricing Limits.

Plan Managers and NDIS Plan Delegates are now telling families that they can’t use funding for recognised evidence-based parent capacity building early childhood intervention services nor the provision of services by Early Childhood Teachers/Educators.