

18th June 2025
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The Hon Mark Butler MP
The Hon Jenny McAllister

Minister for Disability and the National Disability Insurance Scheme
Parliament House
Canberra ACT 2600

Dear Ministers Butler and McAllister,

Response to Annual Pricing Review

I am writing on behalf of the Board of Professionals and Researchers in Early Childhood Intervention (PRECI) to raise our urgent concerns about several of the recommendations in the Annual Pricing Review 2024–25. These recommendations appear to be in contradiction to providing children with disability with the most effective support and ensuring the NDIS is as effective as possible.

As the national peak body for researchers and professionals in Early Childhood Intervention (ECI), we are committed to an evidence-informed approach as described in the Review of Best Practice in Early Childhood Intervention: Review Report.¹ This review was commissioned by the Department of Social Services and delivered by a consortium led by the University of Melbourne, with PRECI and other peak bodies.

This Review was a priority in the Early Childhood Targeted Action Plan (TAP), part of Australia's Disability Strategy 2021-2031. The Independent Review of the NDIS recommended that: the National Disability Insurance Agency, in partnership with the Department of Social Services, the National Disability Supports Quality and Safeguards Commission, should require early intervention capacity building supports for children be based on best practice principles and evidence.

Pricing plays a critical role in shaping quality service provision. The Annual Pricing Review 2025 has failed to take into consideration the impact of its recommendations on best practice principles and evidence. The outcomes of its decisions will be the opposite.

¹ Imms, C., Moore T., Luscombe, D., SNAICC authors, Wilson, M., Knight, S. (2024). *Review of best practice in early childhood intervention: Review Report*. The University of Melbourne, funded by and provided to the Commonwealth of Australia's Department of Social Services. <https://www.preci.org.au/bp-framework-eci/>

What are the key issues?

1. The proposed reduction in rates for travel for ECI and therapeutic supports

This recommendation is contrary to best practice principles and evidence. Being able to travel to deliver services in home and community is a fundamental principle of best practice in ECI. The Annual Pricing Review Report indicates that: *“These arrangements are intended to support participant access to therapy where location or mobility challenges make clinic-based service delivery difficult or **when best practice supports delivery in the participant’s natural environment.**”*² This decision effectively makes the provision of services based on best practice principles and evidence unaffordable, along with best practice supports delivery in the participant’s natural environment. It is curious that a decision to fund half of travel has been made. Who does it assume will pay for the other half and on what basis?

It is regrettable that such a decision has been made in the context of the Review of Best Practice in Early Childhood Intervention: Review Report, the Early Childhood Targeted Action Plan (TAP) and the Independent Review of the NDIS.

Two additional decisions are of concern.

2. The proposed reduction in rates for physiotherapy, dietitians and podiatrists

Accessing the broad range of appropriate therapeutic supports is critical to positive child outcomes. The price freeze on therapy and ECI rates over the past five years, and the new cuts, mean this is unsustainable. National Disability Services in their State of the Disability Sector Report identified that 21% of providers are contemplating exiting the disability services sector entirely and 80% indicated they might be unable to continue offering NDIS services at current prices.³ ECI service providers are indicating that they will be forced to make positions redundant or close their business if the proposed rate cuts are introduced. The delivery of services using best practice principles and evidence needs to be supported to continue.

3. The proposed reduction in rates for psychology and physiotherapy in Western Australia, South Australia, Northern Territory and Tasmania.

Providing supports and services in rural and remote communities and to those living in vulnerable circumstances is critical to equitable service delivery. Children and families living in marginalised communities often have limited access to appropriate, individualised and timely support and services.

² NDIA (2025). Annual Pricing Review 2024-2025. <https://www.ndis.gov.au/media/7721/download?attachment>

³ National Disability Services (2024). State of the Disability Sector Report. https://nds.org.au/images/State_of_the_Disability_Sector_Reports/NDS_State_of_the_Disability_Sector_Report_2024.pdf

What are we seeking?

- We request that you reaffirm the government's commitment to services based on best practice principles and evidence as recommended in the Early Childhood Targeted Action Plan (TAP), the Independent Review of the NDIS and the recent review commissioned by the Department of Social Services.
- We request that you review the NDIS Pricing and reverse decisions which directly undermine the implementation of services based on best practice principles.
- We request that expert bodies on children with disability, including PRECI, be involved in reviewing changes under consideration by the NDIS to consider the implications of changes on the implementation of services based on best practice principles.
- We request the reversal of the changes to travel rates, and payments for physiotherapists, dietitians and podiatrists, and psychology and physiotherapy in WA, SA, NT and Tasmania.

Thank you for your urgent consideration. If the changes continue they will undermine child and family outcomes by reducing access to services based on best practice principles.

We welcome the opportunity to meet with you and discuss these issues further.

Yours sincerely,



Dr Kerry Bull
Deputy Chair – PRECI