



The Hon Bill Shorten MP
Minister for the National Disability Insurance Scheme
Minister for Government Services

11 November 2024

Dear Minister Shorten,

RE: urgent amendments to NDIS Supports Lists required

Speech Pathology Australia and Dietitians Australia, representing over 15,000 speech pathologists and 9000 dietitians respectively, emphasise the critical role these professionals play in supporting individuals with communication, dietary, feeding and swallowing needs. We are very concerned about the gaps and ambiguity in the current NDIS Supports Lists, which may place participants at risk by unintentionally denying access to crucial supports for safe swallowing, nutrition and dietary needs.

We call upon you to make the following urgent changes to the NDIS Supports Lists to ensure the health, wellbeing and safety of people with disability.

Recommendation 1: Add both thickener and modified fluids to the Supports that are NDIS Supports List

- Modified fluids under 'assistive products for personal care and safety' (p.8)
- Thickener under 'disability-related health supports' (p.11) as an assistive product to manage dysphagia.

Recommendation 2: Add dietetics/dietitians to the Supports that are NDIS Supports List

- Dietetics – add dietetics as its own category after "Exercise physiology and personal well-being activities" (p.12). This will make it consistent with the Pricing Arrangements and Price Limits 2024-25 (p.82).
- Dietitians – list dietitians alongside speech pathologists and occupational therapists within the 'early intervention supports for early childhood category' (p.12).

Recommendation 3: Add food processors and aerators as 'carve outs' (exemptions) to the Supports that are Not NDIS Supports List

- Food processors, including blenders, and liquid aerators should be funded following prescription by a relevant allied health professional (such as a speech pathologist or accredited practising dietitian (APD)) under 'day to day living costs – accommodation and household related' (p.3). Currently these items are excluded in all circumstances, even if required to support safe eating and swallowing.

Recommendation 4: Add household items recommended by a qualified speech pathologist or APD to the Replacement Supports List

- Household items recommended by a qualified speech pathologist or APD to address a participant's dietary or swallowing needs under 'Replacement Supports – day to day living – standard commercially available household items' (p. 2).

The rationale for these recommendations is further detailed in Attachment 1.



Please be advised that this letter will be made publicly available.

Meeting request

Speech Pathology Australia and Dietitians Australia would welcome the opportunity to meet with you and discuss these issues further. Please contact Dr Jennifer O'Connor at policy@speechpathologyaustralia.org.au to arrange a meeting at your convenience.

Yours sincerely,

Lyn Brodie

Interim CEO

Speech Pathology Australia

Magriet Raxworthy

CEO

Dietitians Australia

Cc: Ms Rebecca Falkingham PSM, CEO National Disability Insurance Agency

Attachment 1

Rationale

The 2019 [‘Scoping review of causes and contributors to deaths of people with disability in Australia’](#) identified choking and respiratory disease as leading causes of death amongst people with disability. More than 80 per cent of choking incidents involved food items.

The proposed corrections are essential to ensure the ongoing safety of participants with dietary and swallowing needs. The corrections will restore participants’ confidence, ensuring that they do not restrict their intake of foods or fluids, nor risk eating and drinking foods or fluids that are not modified or recommended by their speech pathologist or APD.

When prescribed by a speech pathologist or APD, supports for swallowing and dietary needs are essential, not optional. These supports help prevent serious complications such as dehydration, malnutrition, aspiration and related pneumonia, and can be crucial in preventing choking and potential death.

Importantly, these corrections also ensure that participants have the appropriate professional support for safe eating and drinking, and adequate nutrition.

These recommendations are consistent with the [NDIS Practice Standards and Quality Indicators](#) for mealtime management and severe dysphagia management, which specify the need for meals that are nutritious and of a texture that is appropriate to a person’s individual needs, and require that participants are supported by an appropriately qualified health professional.

Recommendation 1: List both thickener and modified fluids as supports that are ‘NDIS supports’

To manage dietary and swallowing needs, supports like modified foods and fluids, thickening agents, liquid aerators, food processors, and blenders are essential. These must be included in the Lists of Supports when prescribed by qualified allied health professionals acting within their scope of practice. Currently, only modified foods are listed as NDIS supports, not modified fluids or thickening agents, despite their importance.

Recommendation 2: List dietetic services as supports that are ‘NDIS supports’

While the NDIS Pricing Arrangements 2024-25 include both dietetics and exercise physiology under the ‘Capacity Building – Improved Health and Wellbeing’ category (pg. 81-82), the Supports that are NDIS Supports List only mentions ‘exercise physiology and physical wellbeing activities’, omitting ‘dietetics’ entirely (pg. 12).

Since the NDIS Supports List is a key reference for participants, planners, and other stakeholders in determining what supports can be accessed, it is crucial that the Supports that are NDIS Supports List is consistent with the pricing arrangements.

Omitting ‘dietetics’ from the NDIS Supports List will place participants at risk by increasing confusion about what can be funded and limiting access to essential services for people with dietary and swallowing needs. The NDIA must address this by adding ‘dietetics’ to the List of Supports that are NDIS Supports.

Furthermore, dietitians play a vital role in early childhood intervention, supporting children with disability to achieve optimal growth, development and function. Dietitians often work alongside speech pathologists and occupational therapists to support children and their families. Including dietitians in the provider list will clarify which professionals are available to support these children and their families.

Recommendation 3: List food processors and aerators as ‘carve outs’ that can be funded with a prescription by an appropriate allied health professional (including speech pathologists or accredited practising dietitians)

While ‘assistive products for the preparation of food and drink’ are supported by the NDIS, specific household appliances such as liquid aerators and food processors are on the List of Supports that are Not NDIS Supports and therefore excluded.

These items are not included in the list of ‘carve outs’ that may be considered ‘NDIS supports’ for certain participants. This means they are excluded in all circumstances, even if required to support safe and adequate eating, drinking and swallowing (either orally or via alternative means such as feeding tubes).

However, these items are crucial for safe and effective mealtimes, promoting wellbeing and independence and preventing serious health issues for people with dietary and swallowing needs. For example, high-speed blenders and liquid aerators allow food and liquids to be modified to the appropriate texture and consistency, preventing choking and ensuring that participants with dysphagia can consume food and fluids safely.

There must be an exemption for these items to be funded following prescription by a relevant allied health professional (such as a speech pathologist or an APD).

Recommendation 4: List household items as replacement supports when recommended by a qualified speech pathologist or accredited practising dietitian (APD)

Household items needed to address a participant's dietary or swallowing needs, as recommended by a qualified speech pathologist or APD, must be eligible as replacement supports. Various household items may be crucial for participants who require support to eat and drink safely. They may also be the most cost-effective option on the market.