

## NDIA response to the Independent Review of Art and Music Therapy

The National Disability Insurance Agency (NDIA) is committed to supporting a better life for Australians with a significant and permanent disability.

The NDIA commissioned the Independent Review of Art and Music Therapy (Independent Review) to understand if art therapy and music therapy will help National Disability Insurance Scheme (NDIS) participants meet their goals. The NDIA thanks Dr Stephen Duckett AM for his detailed consideration of music and art therapies as NDIS supports, and his extensive work to deliver the final report of the Independent Review.

We also thank everyone who engaged with Dr Duckett in his conduct of the Independent Review. Over 600 submissions were received. In particular we thank the NDIS participants, their families, carers and advocates who contributed.

The Independent Review acknowledges that the premise of the NDIS is facilitative, contributing to participants achieving their own goals. It also notes that Australia has a strong history of ensuring that publicly funded services and supports are evidence-based, and that this approach extends to the NDIS.

The NDIA is committed to ensuring the therapy supports provided to NDIS participants are effective, beneficial, evidence based, and deliver the outcomes participants need and want. We also want to ensure participants and providers are claiming for therapy supports at the appropriate rate.

The key findings of the Independent Review include that:

- art and music therapies are effective and beneficial to people in some circumstances. For example, where the person has a specific condition and the therapy is relevant to them achieving a specific objective or outcome; and

- art or music therapy should only be included as a funded therapeutic support in a participant's plan if there is generalisable evidence which shows the value of art or music therapy for similar people with these types of goals and these types of conditions.

## Recommendations

The Independent Review makes 19 recommendations. Fifteen are for the NDIA, 3 are for the Evidence Advisory Committee (EAC) and one recommendation is for the NDIS Quality and Safeguards Commission (NDIS Commission).

Recommendations directed to the NDIA include providing better support for participants to make informed choices about therapies, and strengthening our practice to ensure that NDIS funded therapies are evidence-based and achieving outcomes for participants.

The Independent Review also recommended that the NDIA adjust the price limit for art therapy and music therapy to align with the price limit for counsellors, enhance our invoice verification processes, and consider alternative pricing models.

The NDIA supports or supports in principle all 15 recommendations directed to it. Recommendations supported in principle may be implemented differently to what has been proposed by the Independent Review. **Table 1** outlines the NDIA's response to each recommendation.

The NDIA has also provided the EAC and the NDIS Commission with their relevant recommendations for consideration.

## Next Steps

Implementation of the recommendations will take time, and the NDIA will engage with participants, providers, other agencies and government in their implementation.

An updated Therapy Supports Operational Guideline will be published later in 2025 and will provide clarity to participants, staff and the sector about what an evidence-based NDIS therapy support is, and which professionals can deliver and claim for NDIS therapy supports.

An updated NDIS Pricing Arrangements and Price Limits (PAPL) will be published in September 2025. Changes to price limits for art therapists and music therapists will come into effect in November 2025.

## The Independent Review into Art and Music Therapy

In November 2024, the NDIA undertook a 'rapid review' of art and music therapy to inform the implementation of new legislation. The rapid review found limited evidence about the effectiveness of art and music therapy as an evidence based, therapeutic support for most people with disability.

Following feedback on the outcome of the rapid review, in December 2024 the NDIA commissioned Dr Stephen Duckett AM to undertake an independent review into the evidence base for art and music therapy.

The Independent Review assessed:

- The NDIA's review of evidence of the effectiveness of art and music therapy for people with disability.
- Pricing of art and music therapy compared with other allied health therapies.

To inform the Independent Review, Dr Duckett invited submissions and received over 600 responses from key provider associations, Disability Representative and Carer Organisations, individual participants receiving these services (and their families, carers and advocates), and service providers.

Over a fifth of all submissions were from people who identified themselves as participants or carers.

Dr Duckett delivered the Independent Review's final report to the NDIA on 17 April 2025.

The Independent Review makes 19 recommendations directed to the NDIA, the EAC and the NDIS Commission.

The NDIA acknowledges and appreciates the substantial work of Dr Duckett and all of the organisations, associations and individuals who contributed to the Independent Review, particularly those with lived experience.

**Table 1 – NDIA response to Independent Review’s recommendations**

Recommendation	NDIA position	NDIA response	Timing
Consider ways in which better information can be provided to participants to assist them to make informed choices about whether particular therapeutic supports could be a useful, evidence-based inclusion in their plans.	Support	<p>The NDIA will continue to provide advice and guidance to participants and providers on NDIS Supports, including therapy through updates to operational guidelines.</p> <p>The NDIA is also developing a wider Informed and Empowered Consumer (IEC) policy to help participants make more informed choices, buy better quality supports and achieve greater compliance with the purchase of NDIS supports. This policy is designed to complement the Participant Safeguarding Policy and Supported Decision Making Policy and provide a number of new resources to address current gaps. This recommendation will inform the development of the IEC policy.</p>	From 2025

Recommendation	NDIA position	NDIA response	Timing
Messaging about evidence should emphasise the benefits to a cohort of participants receiving an art or music therapy intervention, distinguishing that from generic advice about any intervention provided by art or music therapists.	Support	<p>The NDIA will address this recommendation through its consideration of ways to improve the information participants have on therapeutic supports.</p> <p>The NDIA also notes this recommendation is related to the recommendation that the EAC assess the evidence base of art and music therapy interventions in specific cohorts as part of its 2025-26 work plan.</p> <p>The NDIA will work with the EAC on messaging as the evidence base for specific cohorts is determined.</p>	To be determined with EAC

Recommendation	NDIA position	NDIA response	Timing
Strengthen oversight of plans to ensure that all therapeutic support approved - not only in art or music therapy - has a robust evidence base.	Support	<p>The NDIA has an obligation under the <i>National Disability Insurance Act 2013</i> (NDIS Act) to ensure that funded therapy supports are effective and beneficial for participants and current good practice.</p> <p>Consistent with the Independent Review of the NDIS, the Government has established the EAC to make determinations regarding evidence-based supports that are appropriate NDIS supports.</p> <p>The NDIA will work closely with the EAC and continue to review and apply evidence in accordance with the legislation, and to update decision making guidance for NDIA delegates.</p> <p>This includes reviewing and proactively engaging with professional associations on evidence for a range of therapies.</p>	Ongoing

Recommendation	NDIA position	NDIA response	Timing
Systematise its collection of data from providers about the effectiveness and outcomes of therapy interventions for participants, including development of consistent definitions of interventions aligned to a robust participant outcomes framework.	Support in principle	<p>The NDIA will explore opportunities to systematise its data collection from providers about the effectiveness and outcomes of therapy for participants.</p> <p>The NDIA will work closely with peak professional associations to explore consistent definitions of interventions and the range of individual outcome measures, and to explore opportunities to work with providers to collect this information.</p> <p>The NDIA is also developing a new NDIS Outcomes Framework to replace the existing framework. Measuring the effectiveness and outcomes of therapy will be considered in the context of this work.</p>	From 2025

Recommendation	NDIA position	NDIA response	Timing
Ensure that data collected by the NDIA is collated and analysed to ensure that the therapeutic support provided actually achieves a result for the condition for this participant with this provider.	Support in principle	<p>The NDIA will endeavour to collect, collate, and analyse data that supports its ability to assess the extent to which therapeutic support provided to participants is contributing to the achievement of outcomes (or results) for the participant, compared to the magnitude of funding provided.</p> <p>Where possible, the NDIA will consider key participant and provider characteristics. This will be contingent on the availability of suitable and reliable data.</p>	Ongoing
Set rate maxima for art and music therapists on the basis that these are distinct professions, providing evidence-based therapy, not simply supervising art or music activities.	Support	The NDIA will update the PAPL in line with this recommendation.	September 2025
Align the maximum payment limit for art and music therapy with the maximum payment limit for counsellors.	Support	The NDIA will update the PAPL in line with this recommendation.	From November 2025



Recommendation	NDIA position	NDIA response	Timing
Explore establishing differentials within the allied health professionals' scales to recognise different capacity to provide services and/or to recognise levels of skills and experience.	Support in principle	The NDIA has committed to publish a three-year Pricing Workplan (Pricing Workplan) before the end of 2025.	Ongoing
Expand its capacity to monitor market dynamics to assess supply of, and the demand for, art and music therapy and therapists.	Support in principle	The NDIA remains committed to supporting and monitoring the NDIS provider market to deliver for people with disability over the next generation and beyond. This includes consideration of market dynamics and plan utilisation data to ensure participants have access to quality supports.	Ongoing
In the medium term, set payment limits for art and music therapy that take account of their labour market monitoring and the need to ensure there is an adequate supply of art and music therapists to meet the requirement for evidence-based provision of art and music therapy.	Support in principle	The NDIA is committed to monitoring NDIS markets to ensure continuity of supports for participants as pricing reforms are implemented.	Ongoing

Recommendation	NDIA position	NDIA response	Timing
Consider alternative methods for funding early intervention services which are consistent with best practice guidelines and any future agreed early childhood intervention best practice frameworks, which encourage holistic evidence-based and outcomes-focused provision consistent with the early childhood approach.	Support in principle	The NDIA will continue to work with the Department of Health, Disability and Ageing to ensure the approach to early childhood intervention supports aligns with best practice frameworks, including through the design and development of the Thriving Kids program.	From 2025
Consider a different payment and funding approach, particularly for large organisational providers.	Support in principle	The NDIA has committed to publishing a Pricing Workplan before the end of 2025 outlining how future pricing reforms will be delivered, as recommended in this year's Annual Pricing Review.	Ongoing
Specify in its Pricing Arrangements and Price Limits, that art and music therapy cannot be claimed under 'other professional'	Support	The NDIA will update the PAPL to provide clear guidance for art and music therapy claiming processes against the relevant profession line item.	September 2025

Recommendation	NDIA position	NDIA response	Timing
<p>Ensure that funding for art and music therapy as a Therapeutic Support for self-managed participants be limited to supports provided by appropriately trained art and music therapists as defined by NDIA who meet the requirements of NDIS Quality and Safety Commission registration.</p> <p>In other circumstances, art or music activities should be classified as Participation in Community, Social and Civic Activities and funded accordingly.</p>	Support in principle	<p>The NDIA supports the intent of this recommendation and will engage with the NDIS Commission on this recommendation.</p> <p>The NDIA notes that funding cannot be used to cover the cost of art or music activities, however NDIS funding can be used for supports a participant may need to participate in art or music activities.</p>	2025-26
Enhance invoice verification process to ensure that only eligible providers are reimbursed under the art or music therapy item numbers.	Support	The NDIA is considering its options to amend the claim form to include a practitioner ID field. This will enable the NDIA to validate therapy supports to ensure they are being provided by an appropriately qualified professional.	2026

# National Disability Insurance Agency

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