

27 February 2026

NDIS Strategy and Policy Branch
Department of Health, Disability and Ageing
GPO Box 9848
CANBERRA ACT 2601

Submitted by email: NDISRegulation@health.gov.au

Dear NDIS Strategy and Policy Branch,

APS Submission to the Consultation on a New Definition for NDIS Providers

The Australian Psychological Society (APS) welcomes the opportunity to provide feedback on the proposed National Disability Insurance Scheme (NDIS) provider definition framework. As the largest peak professional body for psychology in Australia, the APS is committed to promoting quality, safety and efficiency in provider regulation for the benefit of NDIS participants.

However, we hold concerns that the proposed graduated risk-proportionate provider registration model does not adequately recognise the distinct characteristics and existing regulatory frameworks of established health professions like psychology.

1. Lack of Proportionality for Regulated Health Professionals

In principle, the APS supports the objective of ensuring NDIS participant safety through a graduated and risk-responsive framework. However, we are concerned about the lack of proportionality in applying the proposed graduated risk model to psychologists, who are health professionals already regulated by the Psychology Board of Australia.

Psychologists are subject to:

- Mandatory registration with statutory oversight;
- Continuing professional development and peer consultation requirements;
- Professional indemnity insurance requirements;
- Ethical and professional conduct standards; and
- Complaints and disciplinary processes.

In addition, psychology is an established profession whose members take seriously the responsibilities of accountability and maintain a strong public service orientation. Psychologists are supported through professional associations, including the APS, which provides comprehensive opportunities for members to learn, reflect and engage with professional standards and requirements. This robust professional infrastructure demonstrates the commitment of psychologists to maintaining the highest standards of practice and accountability.

As such, the proposed model fails to adequately recognise or account for these existing risk mitigation measures inherent in professional regulation.

Consequently, treating psychology as a medium-risk activity over-regulates the profession relative to other sectors that lack comparable statutory oversight. As such, it represents a disproportionate regulatory burden that does not align with risk-based principles.

2. Unresolved Policy Direction: Mandatory Registration for Ahpra-regulated Providers

In practice, the effectiveness and appropriateness of this model cannot be properly assessed without a clear policy direction regarding mandatory NDIS registration requirements for providers regulated by the Australian Health Practitioners Regulation Agency (Ahpra) and its national boards. Until such policy settings are articulated by Government and a concrete proposal is in place, we are unable to respond other than in relation to a hypothetical outcome.

This uncertainty undermines the consultation process, preventing meaningful engagement and the provision of targeted, actionable feedback. We await this required necessary policy clarity to enable substantive and productive consultation with peak bodies such as the APS.

Thank you for the opportunity to contribute to the Department's consultation on A New Definition for NDIS Providers. If further information is required, I would be happy to be contacted through the National Office on (03) 8662 3300 or by email at z.burgess@psychology.org.au

Yours sincerely,

Dr Zena Burgess, FAPS FAICD
Chief Executive Officer

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