

#1

RespectCommunications@gmail.com

From: respectcommunications@gmail.com
Sent: Monday, 31 October 2022 2:31 PM
To: Enquiries@NDIS.gov.au; Provider.Support@NDIS.gov.au
Cc: 'Helen Scarr'; 'Sue Spence'; 'Linda Browning'
Subject: Re: NDIS Code Enquiry

Importance: High

To whom it may concern

My name is Fiona Hanafin and I am sending this email on behalf of the Horses Helping Humans (HHH) program, of which I am a trainer of all facilitators and licensees throughout Australia and NZ.

The HHH program is a certified Equine Assisted Learning (EAL) intervention program. In this program, we give clients an awareness of their body language and energy projection (particularly when under stress) and then equip them with skills to help regulate their emotional state. The program builds clients' confidence and social awareness.

As a result of the program, many of the participants are then empowered to re-engage back into education, workforce, society, etc. thus transforming their lives, and the lives of others in their direct environment.

To find out more information about the program, please visit the following website:

www.HorsesHelpingHumansAustralia.com

Many of the facilitators and licensees in Australia provide services to NDIS clients. As a trainer within the HHH program, I am receiving many inquiries from facilitators and licensees with regards to which NDIS codes they can and cannot use on their invoices.

Hence, I am writing this email in the hope that we can get some clear clarification from NDIS / NDIA with regards to which codes we can and cannot use. Your response will be circulated throughout the HHH program

To be very clear, we are an equine assisted learning program and not equine therapists. That is, we are not allied health workers. Below are some of the codes that we wish to get clarification on whether we can use in our invoices or not.

(When responding to this email, please put a 'Yes' or 'No' to the left hand side of the code on each line. For any codes that you respond with a 'No', can you please give a full explanation further on in your reply email, as we have been advised by multiple people in the NDIS / NDIA industry on multiple occasions that we can use all of the below codes – we just want to get it in writing now!).

- 01_741_0128_1_3 - AT - Other Therapy
- 01_741_0128_1_3 - Assessment Recommendation Therapy or Training Supports - Other Professional
- 04_104_0125_6_1 - Access Community, Social and Recreational Activities
- 04_210_0125_6_1 - Community, Social and Recreational Activities
- 04_210_0125_6_1 - Increased Social and Community Participation
- 04_210_0125_6_1 - Core
- 09_008_0116_6_3 - Innovative Community Participation
- 09_008_0116_6_3 - Capacity Building
- 09_008_0116_6_3 - Innovative Community Participation - Capacity Building
- 09_011_0125_6_3 - Increased Social and Community Participation
- 09_011_0125_6_3 - Capacity Building
- 15_037_0117_1_3 - Community, Social and Recreational Activities
- 15_056_0128_1_3 - AT - Other Therapy

15_056_0128_1_3 - Capacity Building

15_056_0128_1_3 - Assessment Recommendation Therapy and / or Training (including AT)

15_056_0128_1_3 - Other Therapy

15_056_0128_1_3 - Capacity Building - Daily Living – OT

Undoubtedly, more queries with different NDIS codes will come in as time progresses. As, and when, this occurs I shall submit another email query accordingly.

I look forward to your prompt reply and request that you press 'Reply All' when responding to this email, so that all recipients in this email are included in your answer.

Kind regards

Fiona Hanafin

Head of Horses Helping Humans Training

Ph: 0438 137 604

#2

RespectCommunications@gmail.com

From: provider.support <provider.support@ndis.gov.au>
Sent: Thursday, 3 November 2022 4:11 PM
To: respectcommunications@gmail.com
Cc: 'Helen Scarr'; 'Sue Spence'; 'Linda Browning'; provider.support
Subject: RE: NDIS Code Enquiry [SEC=UNOFFICIAL]

Good afternoon Fiona,

Thank you for your recent enquiry to the National Disability Insurance Agency (NDIA).

Please see detailed notes to the below line items, we have highlighted the most applicable codes:

- 01_741_0128_1_3 - AT - Other Therapy
 - No, this support item is for **disability-related health supports** and utilised to provide care, other than nursing care, to respond to the disability-related health needs of a participant where that care may not be the responsibility of the health system. (more information about this support: <https://www.ndis.gov.au/understanding/supports-funded-ndis/disability-related-health-supports>)
- 01_741_0128_1_3 - Assessment Recommendation Therapy or Training Supports - Other Professional
 - No, this support item is for **disability-related health supports** and utilised to provide care, other than nursing care, to respond to the disability-related health needs of a participant where that care may not be the responsibility of the health system. (more information about this support: <https://www.ndis.gov.au/understanding/supports-funded-ndis/disability-related-health-supports>)
- 04_104_0125_6_1 - Access Community, Social and Recreational Activities
 - Yes, this support item enables a participant to engage in community, social and recreational activities therefore would apply to the below support
- 04_210_0125_6_1 – Community, Social and Recreational Activities
 - Yes, this support is the same as above however allows providers to charge a higher rate than the above code (should still be an affordable rate). This line item can be used
- 04_210_0125_6_1 – Increased Social and Community Participation
 - Same code as above, however this code can only be claimed from the Social Community and Civic Participation in the core budget
- 04_210_0125_6_1 – Core
 - Same code as above, however this code can only be claimed from the Social Community and Civic Participation in the core budget
- 09_008_0116_6_3 - Innovative Community Participation
 - Yes, however this is claimed from Increased Social and Community Participation which is less likely already included in a participants plan and may require a report to have this budget included in their plan where as most participants will have funding in the Social Community and Civic Participation in the core budget
- 09_008_0116_6_3 – Capacity Building
 - Same code as above, however this code can only be claimed from the Increased Social and Community Participation
- 09_008_0116_6_3 - Innovative Community Participation – Capacity Building
 - Same code as above, however this code can only be claimed from the Increased Social and Community Participation
- 09_011_0125_6_3 - Increased Social and Community Participation
 - Yes, however this is claimed from Increased Social and Community Participation which is less likely already included in a participants plan and may require a report to have this budget included in their plan where as most participants will have funding in the Social Community and Civic Participation in the core budget
- 09_011_0125_6_3 – Capacity Building
 - Same code as above, however this code can only be claimed from the Increased Social and Community Participation
- 15_037_0117_1_3 - Community, Social and Recreational Activities

- No, As this support is being claimed from a therapy budget it would be expected the service is being provided by a equine therapists
- 15_056_0128_1_3 - AT - Other Therapy
- No, this support can only be delivered by the types of professionals, and therapy assistants listed on page 92/93 of the pricing arrangements
- 15_056_0128_1_3 - Capacity Building
- No, this support can only be delivered by the types of professionals, and therapy assistants listed on page 92/93 of the pricing arrangements
- 15_056_0128_1_3 - Assessment Recommendation Therapy and / or Training (including AT)
- No, this support can only be delivered by the types of professionals, and therapy assistants listed on page 92/93 of the pricing arrangements
- 15_056_0128_1_3 - Other Therapy
- No, this support can only be delivered by the types of professionals, and therapy assistants listed on page 92/93 of the pricing arrangements
- 15_056_0128_1_3 - Capacity Building - Daily Living – OT
- No, this support can only be delivered by the types of professionals, and therapy assistants listed on page 92/93 of the pricing arrangements

Whilst we are unable to advise which code should be used as this is up to the providers discretion, the most appropriate code would be 04_210_0125_6_1 as this item code is not price controlled, it will allow you to claim an affordable rate and is claimed from the relevant budget with services being provided

If you require any further assistance then reply to provider.support@ndis.gov.au
Alternatively you can contact the NDIS National Contact Centre on 1800 800 110 Monday to Friday between 8am-8pm.

Kind Regards

Samantha
National Contact Centre
Provider Support



Delivered by the
National Disability
Insurance Agency

National Disability Insurance Agency
T 1800 800 110

#3

RespectCommunications@gmail.com

From: respectcommunications@gmail.com
Sent: Monday, 7 November 2022 9:20 AM
To: 'provider.support'
Cc: 'Helen Scarr'; 'Sue Spence'; 'Linda Browning'
Subject: RE: NDIS Code Enquiry [SEC=UNOFFICIAL]

Thank you for your prompt response Samantha, much appreciated. I will be replying more fully in due course. However, in the meantime, can you please put a 'Yes' or 'No' next to the following codes (sorry, you DO need to treat me like an idiot and spell it out!!!) . . .

- 04_210_0125_6_1 – Increased Social and Community Participation
- 04_210_0125_6_1 – Core
- 09_008_0116_6_3 – Capacity Building
- 09_008_0116_6_3 - Innovative Community Participation – Capacity Building
- 09_011_0125_6_3 – Capacity Building
- 15_037_0117_1_3 - Community, Social and Recreational Activities

Thanking you in advance
Fiona Hanafin
Ph: 0438 137 604

#4

RespectCommunications@gmail.com

From: respectcommunications@gmail.com
Sent: Tuesday, 8 November 2022 9:26 AM
To: 'provider.support'
Cc: 'Helen Scarr'; 'Sue Spence'; 'Linda Browning'
Subject: RE: NDIS Code Enquiry [SEC=UNOFFICIAL]

Hi Samantha

Can I please organise a meeting with an approved quality auditor of the NDIS Commission, having the relevant qualifications, expertise and experience to grant a program, such a Horses Helping Humans (HHH), to use the "Other Professional / Other Therapy" support item. According to many conversations I am having with agencies (who obviously specialise in the NDIS) I am being told that our (highly qualified and certified) HHH facilitators do qualify as "Other Professionals" and that our program does qualify as an "Other Therapy". I am in the process of getting multiple letters of support, including from professionals (such as OT's and psychologists) who have referred multiple clients to the HHH program. Indeed, the HHH program is known to achieve results that no other profession has been able to achieve. When I read page 92 & 93 of the NDIS Pricing Guide it certainly appears that HHH qualifies for the 15_ NDIS codes. I also have reference to other literature in the pricing guide which supports our argument and it would be greatly appreciated if we can have a meeting with the NDIS to fully explore and discuss and, hopefully, authorise us to use some / many of the NDIS codes you have specifically said we do not qualify for.

I await a response from you with a meeting day and time – I guess it will be a phone / zoom appointment?

Looking forward to hearing back from you soon.

Fiona Hanafin

Ph: 0438 137 604

#5

RespectCommunications@gmail.com

From: provider.support <provider.support@ndis.gov.au>
Sent: Wednesday, 9 November 2022 1:48 PM
To: respectcommunications@gmail.com
Cc: provider.support
Subject: RE: CAUTION: Email may contain unverified link [be careful if proceeding]RE: NDIS Code Enquiry [SEC=UNOFFICIAL]

Good afternoon Fiona,

Thank you for your recent enquiry to the National Disability Insurance Agency (NDIA).

No worries, please see below:

04_210_0125_6_1 – Increased Social and Community Participation - No
04_210_0125_6_1 – Core - Yes
09_008_0116_6_3 – Capacity Building - No
09_008_0116_6_3 - Innovative Community Participation – Capacity Building - No
09_011_0125_6_3 – Capacity Building - No
15_037_0117_1_3 - Community, Social and Recreational Activities - No

If you require any further assistance then reply to provider.support@ndis.gov.au
Alternatively you can contact the NDIS National Contact Centre on 1800 800 110 Monday to Friday between 8am-8pm.

Kind Regards

Samantha
National Contact Centre
Provider Support



Delivered by the
National Disability
Insurance Agency

National Disability Insurance Agency
T 1800 800 110

#6

RespectCommunications@gmail.com

From: respectcommunications@gmail.com
Sent: Wednesday, 9 November 2022 5:04 PM
To: 'provider.support'
Cc: 'Helen Scarr'; 'Sue Spence'; 'Linda Browning'
Subject: RE: URGENT NDIS Code Enquiry [SEC=UNOFFICIAL]

Importance: High

Hi Samantha

Thank you for your responses to date. In one of my emails to you, I asked to have a meeting with "an approved quality auditor of the NDIS Commission". Apparently, I do not wish to have such a meeting now, as I have discovered that relates to NDIS registered providers, of which I am not! Apparently it is you / your department that I need to have a conversation with. Ideally, I would REALLY appreciate it if we could have a verbal conversation, as I have so many questions that I would like to ask. Following the verbal conversation, I would then be more than happy to document the outcomes of our conversation and send to you for you to confirm its accuracy. Please feel free to ring me on 0438 137 604.

At this stage, I wish to discuss the following with you:

15_037_0117_1_3 - Community, Social and Recreational Activities

- No, As this support is being claimed from a therapy budget it would be expected the service is being provided by a equine therapists

15_056_0128_1_3 - AT - Other Therapy

- No, this support can only be delivered by the types of professionals, and therapy assistants listed on page 92/93 of the pricing arrangements

15_056_0128_1_3 - Capacity Building

- No, this support can only be delivered by the types of professionals, and therapy assistants listed on page 92/93 of the pricing arrangements

15_056_0128_1_3 - Assessment Recommendation Therapy and / or Training (including AT)

- No, this support can only be delivered by the types of professionals, and therapy assistants listed on page 92/93 of the pricing arrangements

15_056_0128_1_3 - Other Therapy

- No, this support can only be delivered by the types of professionals, and therapy assistants listed on page 92/93 of the pricing arrangements

15_056_0128_1_3 - Capacity Building - Daily Living – OT

- No, this support can only be delivered by the types of professionals, and therapy assistants listed on page 92/93 of the pricing arrangements

I have been told by multiple agencies that we (the Horses Helping Humans (HHH) program facilitators) actually have a very strong case to be able to use the NDIS code numbers beginning with 15 (& possibly other NDIS numbers you have said 'No' to?).

Shortly I will present some of the arguments. Firstly, I wish to fill you in with exactly who HHH is and what we do. The HHH program is a certified and trade marked program. It is highly recognised and studied by various universities throughout Australia because it is a strong outcomes based program. It was created by a lady called Sue (Suzanne) Spence, who has a Diploma of Child, Youth and Family Intervention. The program is recognised as an Equine Assisted Learning intervention program.

For anyone to run the HHH program they need to pass an extensive training program and be fully certified. When a client does a HHH program, they are not 'just hanging out with a horse' – we are teaching and equipping our clients with very specific life skills. We teach participants about the core personality types (using horses names) and how their strongest one or two personality types will predispose them to a certain body language and energy projection,

particularly when they are under stress. We then equip clients with skills specifically designed to help them regulate their emotional state. Indeed, the HHH program has had a huge impact on many clients, where other professional services (such as OT and psychology for example) has not had any impact / success with the client. It is not uncommon for clients to be referred to our program by other allied health workers.

In addition to gaining an awareness of self and others and building confidence and social skills, so many other skills are also learnt / refined. These include, but are certainly not limited to: following instructions, building coordination and strength skills, building fine motor skills, reading other people / animals / situations and responding accordingly, regulating emotional state, learning to be more assertive in life, particularly when asking for something – we want to encourage passive people to become more assertive and confident, and aggressive people to become assertive, but in a much softer way.

We believe that our HHH program qualifies as an ‘Other Therapy’ run by ‘Other Professionals’.

On page 93 of the NDIS Pricing Guide an ‘Other Professional’ is “A person who is not one of the types of professionals listed above but who the provider considers to be an appropriate professional to deliver therapeutic supports in line with the NDIS quality and safeguarding commissions requirements for the therapeutic supports registration group”. We believe we qualify to be considered as ‘Other Professionals’ and granted permission to us the 15 NDIS code numbers.

I am being told things which are contrary to your decision. Below are comments we have received from various agencies:

- 1 “In order to be funded under the NDIS, it is a requirement that the therapy is supported by a letter of recommendation from an allied health professional stating how it is related to the client’s NDIS plan goals.” Hence, if we have that, can we then use the 15 numbers? Likewise, with other NDIS numbers you have said ‘No’ to – does the above argument change any of your answers?
- 2 “I have looked into Equine Assisted Learning (EAL) and Equine Therapy programs. It appears that the NDIS now fund both of these therapies under the other therapy line item.” Is this the case? And, if so, can we then use the 15 numbers? Likewise, with other NDIS numbers you have said ‘No’ to – does the above argument change any of your answers?
- 3 “What your previous email from the NDIA shows <ie the email from yourself> is the technicality that you must abide by if you were registered with the NDIA. Making sure you get paid, and what appropriate line item to use is the responsibility of the plan manager and the related participant, and self managed parties.” Is this correct? If so, can we use the 15 NDIS numbers when recommended by plan managers / self managed clients? Likewise, with other NDIS numbers you have said ‘No’ to – does the above argument change any of your answers? Furthermore, who exactly is responsible for what? I am being told different things by different agencies. Some are saying what is quoted above and others are saying that we (the service provider) are totally and solely responsible for the code that we use? Surely, if an agency recommends a line item, then the provider can assume that it is ok, given that the agencies specialise in the NDIS industry?
- 4 Further to the quote directly above, I am being told that there is more flexibility for agency and self managed clients with regards to their coding, rather than NDIS managed clients. Is this true? If so, in what respect(s)? Do your answers relate only to NDIS managed clients? Or does it relate to plan managed / self managed clients as well? If so, is there more flexibility in us being able to use the 15 numbers? Likewise, with other NDIS numbers you have said ‘No’ to – does the above argument change any of your answers?

I know there is a lot in this email and, believe it or not, I have heaps of other questions I would like clarified as well! As mentioned earlier, I would REALLY appreciate the opportunity to be able to discuss these various issues verbally, and then summarise it in writing.

We respectfully request that you reconsider and change your answers above accordingly.

It would be appreciated if you could please respond to this email as urgently as possible, because many clients across Australia will be impacted by the end outcomes to the questions above.

Looking forward to hearing back from you soon,
Fiona Hanafin
Horses Helping Humans
Head Trainer – Australia & New Zealand
Ph: +61 438 137 604

#7

RespectCommunications@gmail.com

From: provider.support <provider.support@ndis.gov.au>
Sent: Thursday, 10 November 2022 11:43 AM
To: respectcommunications@gmail.com
Cc: provider.support
Subject: RE: CAUTION: Email may contain unverified link [be careful if proceeding]RE: NDIS Code Enquiry [SEC=UNOFFICIAL]

Good morning Fiona,

Thank you for your email.

You will need to contact the NDIS Commission in regards to your below request to speak with an approved quality auditor of the NDIS Commission

Website: <https://www.ndiscommission.gov.au/>
Email: contactcentre@ndiscommission.gov.au
Contact Number: 1800 035 544

Kind Regards
Samantha
National Contact Centre
Provider Support



National Disability Insurance Agency
T 1800 800 110

#8

RespectCommunications@gmail.com

From: respectcommunications@gmail.com
Sent: Thursday, 10 November 2022 11:51 AM
To: 'provider.support'
Cc: 'Sue Spence'; 'Helen Scarr'; 'Linda Browning'
Subject: RE: CAUTION: Email may contain unverified link [be careful if proceeding]RE: NDIS Code Enquiry [SEC=UNOFFICIAL]

Importance: High

Hi Samantha

Since sending you this email, I have actually rang the NDIS Commission to speak with an approved quality auditor and they said that I need to actually speak with you! Hence, I have sent you another email, which was sent yesterday afternoon.

I look forward to your reply to that email.

Please feel free to ring me if you wish to discuss anything further.

Fiona Hanafin
Ph: 0438 137 604

#9

RespectCommunications@gmail.com

From: provider.support <provider.support@ndis.gov.au>
Sent: Friday, 11 November 2022 5:05 PM
To: respectcommunications@gmail.com
Cc: provider.support
Subject: RE: URGENT NDIS Code Enquiry [SEC=UNOFFICIAL]

Good afternoon Fiona,

Thank you for your recent enquiry to the National Disability Insurance Agency (NDIA).

We are unable to advise which code is applicable as this is based on the service being provided to the participant and up to the providers discretion.

As an un-registered provider you don't have to follow the guidelines set by the NDIA, allowing you to use any code you think suits the service being provided to the participants

If you require any further assistance then reply to provider.support@ndis.gov.au
Alternatively you can contact the NDIS National Contact Centre on 1800 800 110 Monday to Friday between 8am-8pm.

Kind Regards
Samantha
National Contact Centre
Provider Support



National Disability Insurance Agency
T 1800 800 110