

# Independent Pricing Review

## *NDIA Response*

2 March 2018

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# Message from the Chairman

In June 2017, the Board of the National Disability Insurance Agency (NDIA) engaged McKinsey & Company to undertake an Independent Pricing Review (IPR) for the National Disability Insurance Scheme (NDIS). McKinsey & Company delivered their Report to the NDIA Board in late December 2017 in line with the timetable to which they had committed. They met with the Board of the NDIA at the end of January, where the Board and senior management sought clarification of some points. McKinsey & Company subsequently decided to make a small number of minor amendments to clarify these points and delivered their Final Report to the NDIA on 14 February, 2018.

The Board of the NDIA sincerely thanks McKinsey & Company for delivering a Report of high quality. In the process of developing their recommendations, they not only consulted with over 1,000 individuals across Australia, but undertook extensive market benchmarking and detailed analysis of the market for disability supports.

In addition, the NDIA Board sincerely appreciates the input and advice provided by all organizations and individuals who participated in and gave so freely of their time in the preparation of this Report. Their commitment is indicative of the sector's widespread desire to ensure the NDIS's success.

The IPR Report contains 25 recommendations. All recommendations have been accepted in principle by the Board.

The most important task now facing the NDIA is to ensure that the recommendations are actioned in a thorough, timely and diligent way that reflects the NDIA's commitment to strong implementation.

The Report highlights the challenges facing not just the NDIA, but also those issues that some providers are dealing with in making the transition from block funding to the participant-led NDIS. The NDIA is committed to working collaboratively with the sector to fulfil the commitment to delivering a strong, vibrant and innovative market for quality disability supports.

The program of work that has emerged from the IPR sits side by side with other initiatives being undertaken by the NDIA. This includes the Participant and Provider Pathways Review, which is now well advanced in being piloted, prior to a full roll out. This is consistent with the NDIA's commitment to addressing issues as they emerge so that the NDIS offers participants a quality experience that makes a difference to their lives; that encourages a vibrant provider market that will progress to a deregulated market over time; while ensuring that the Scheme is financially sustainable.

Going forward, the NDIA will establish a Pricing Committee, led by management but under the auspices of the NDIA Board, that will try to ensure transparency and an active monitoring of pricing decisions as the market evolves and grows to adequately meet the needs of participants. This Committee will also work proactively with the sector to achieve that goal.

As part of this transparency, the Board is releasing the McKinsey & Company Report in its entirety.

Sincerely

Dr Helen Nugent AO  
Chairman, National Disability Insurance Agency

# 1. Introduction

The National Disability Insurance Scheme (NDIS) represents a significant change in the way people with disability access supports, empowering them to exercise choice and control. In that regard, it constitutes a profound change from the prior welfare approach, which was typically block funded.

This new approach has posed challenges not just for the NDIA, but also for providers and participants as they adapt to a new way of interacting.

Despite rapid growth, the market for supports is still evolving. As at 31 December 2017, 12,328 providers have registered to provide supports to over 142,000 participants.

Because of the rapid growth in demand for supports in an evolving market, the need for a cap on prices has been recognized. As the market develops, it is envisaged that price controls will progressively be reduced, with participants and providers eventually operating in a deregulated market.

## 1.1 The NDIA's overall role

The NDIA has a critical role to play in ensuring the market evolves in an appropriate and timely way.

One key role is as a provider of information. The NDIA, not only needs to assist providers with information on the nature of demand, but also to facilitate the process of providing information as to which providers are available in which geographies with specific services. The NDIA is doing additional work on this with its Provider Finder.

Pricing is another key dimension that assists with the matching of supply and demand. If prices are too low, there is likely to be inadequate supply. If prices are too high, too much supply might emerge for a specific support and market distortions might occur.

The NDIA is best positioned to respond to market signals, particularly when a supply shortfall occurs at short notice. While an annual pricing review process is the NDIA's regular way of responding to such signals, it is not the only way. The NDIA is also committed to listening to participants and providers, and when a market-gap occurs, responding in a timely and effective way to address signals. In some instances, these may be a price-based response. In other cases, additional information might be required.

This is integral to the NDIA's commitment to being a responsible market steward that builds market confidence.

## 1.2 The Independent Pricing Review

The Independent Pricing Review was initiated by the Board of the NDIA in June 2017 in response to market feedback that some providers were under pressure during transition and that the potential existed that the needs of participants would not be met.

The Board asked McKinsey & Company to undertake a review and report back by the end of December.

McKinsey & Company have undertaken that work independently of the NDIA.

Their mandate was as follows:

1. Provide recommendations in relation to improved pricing effectiveness, including but not limited to:
  - National versus regional pricing
  - Pricing of services with different levels of complexity
  - Pricing of respite services
  - Thin and undersupplied markets, particularly in regional and remote areas
  - Relative provider efficiencies, including overheads
  - Adequacy of provider returns
  - Effectiveness of the Hourly Return approach used to set prices.
2. Provide recommendations in relation to the potential early deregulation of price in more mature sub-markets and the glide path for the eventual deregulation of price more generally.

McKinsey & Company have fulfilled their brief, interacting with over 1,000 individuals throughout Australia. They delivered their report to the NDIA Board at the end of December, 2017. The Board of the NDIA announced receipt of the Report to the market immediately after the Report was received.

Subsequently, at an NDIA Board meeting at the end of January, the Board and senior management sought clarification of some minor points from McKinsey & Company. McKinsey & Company subsequently decided to make a small number of minor amendments to clarify these points and delivered their Final Report to the NDIA on 14 February, 2018.

In the interest of keeping the market informed, this paper provides the NDIA's initial feedback on the Report.

The prime overarching focus of the NDIA is to ensure a vibrant market for providers so that participants get improved outcomes that allow them to live an ordinary life. In addition, the NDIA must ensure that the financial sustainability of the Scheme is maintained so that it is in place for generations to come.

In the short-term it is important that the NDIS has the required price caps while the market evolves. In the longer-term, the NDIA wants competitive tension in the marketplace to determine the price of supports. The NDIA will continue to monitor the market for indications of this competitive tension as the NDIS moves towards a deregulated market over time. Already in parts of the NDIS market, self-managing participants, as empowered consumers, are seeking value for money, which is driving competitive pricing, greater flexibility and a quality workforce.

Finally, the NDIA will continue to improve its engagement with the sector by ensuring decisions regarding market interventions are made consultatively and transparently. The NDIA will continue work that is underway on the Provider and Participant Pathways and has committed to improving its consultation with the sector.

## 2. Response to recommendations

The Independent Pricing Review contains 25 recommendations, all of which the NDIA accepts in principle.

### 2.1 Summary of recommendations

The recommendations themselves can be broadly grouped into three themes:

1. **Market monitoring and engagement** – recommendations related to improving data collection, decision making and engagement with the sector;
2. **Price limits** – recommendations that deal directly with price caps, including those to review current limits or inclusion of new price limits or tiers.
3. **Supporting interventions** – recommendations that include a range of complementary market interventions that address specific or localised market failures or inefficiencies resulting from existing regulatory interventions.

In supporting the recommendations in all three categories, the NDIA acknowledges the important feedback provided by the sector, the analysis undertaken by McKinsey, and the need to ensure a flexible approach to challenges as they emerge. The NDIA is also mindful of the pressures that exist for some providers who are challenged by the complexity and pace of the roll-out of the Scheme. The NDIA is committed to ensuring a vibrant provider sector that meets the needs of participants.

At the same time, the NDIA is aware of the need to do this in a way that is financially sustainable. Only through fiscal responsibility can the longevity of the Scheme be assured. The NDIA board considers that the IPR recommendations with a financial impact will not, of themselves, adversely impact the Scheme's longer-term financial sustainability. Having a vibrant provider sector is vital to that longer-term financial sustainability.

The McKinsey & Company recommendations recognise the need to achieve this balance.

They address a wide range of important issues across the sector.

The sections below provide feedback on the recommendations against the three themes outlined above.

#### 2.1.1 Market monitoring and engagement

The NDIA has classified seven recommendations as being in the category of Market Monitoring and Engagement. They are Recommendations 1, 11, 12, 13, 22, 23 and 24. More detail is provided in Sections 2.2 and 2.3.

The NDIA accepts and supports all recommendations related to market monitoring and engagement. These recommendations will be helpful in guiding and shaping the NDIA's existing work and are critical in enabling the NDIA effectively to execute its role as a market steward.

#### 2.1.2 Price limits

The NDIA has classified six recommendations as relating to Pricing Limits. They are Recommendations 5, 7, 9, 10, 14 and 16.

These recommendations aim to help relieve cost pressures faced by some providers, particularly those delivering supports to participants with complex needs.

More specifically, the NDIA supports the recommendation that, for a period of twelve months, temporary transitional support of overheads is provided. This recommendation is focused on helping providers become more efficient while building market capacity and delivering outcomes for participants during transition.

As implementation details are finalized, the NDIA will more fully define how the temporary arrangements will be wound back at the end of twelve months.

### 2.1.3 Supporting interventions

The IPR has made 12 recommendations that the NDIA has classified as Supporting Interventions. They are recommendations 2, 3, 4, 6, 8, 15, 17, 18, 19, 20, 21 and 25.

These recommendations provide a useful framework for alleviating current stresses in the market, while striking an appropriate balance between the needs of participants and providers, while recognizing the importance of financial sustainability over the long haul. They are also consistent with encouraging innovation by providers.

## 2.2 Implementation strategy

The NDIA will now ensure the recommendations are implemented in a thorough, timely and diligent way that reflects the NDIA's commitment to strong implementation and drive to deliver better outcomes for NDIS participants and providers.

While some recommendations require additional work to understand their full impact, implementation will be phased so that those recommendations, that produce the greatest benefits for providers and participants, will be actioned first. This is consistent with the NDIA's commitment to delivering better outcomes for both NDIS participants and providers alike

Other considerations in determining the phasing have been urgency, timing and the scale of each recommendation.

The NDIA is using the following timing framework to provide a broad indication of when the recommendations will be implemented.

**Timing:**

**Immediate:** as quickly as possible within 6 months, and most likely by 1 July, 2018 as part of the next price review

**Short term:** 6-18 months

**Medium term:** 18+ months

The proposed timing for each recommendation according to the three categories designated above is as follows.

### ***Market Monitoring and Engagement***

<b>Recommendation</b>	<b>Timing</b>
1. Outline of clear approach to market intervention.	Immediate

<b>Recommendation</b>	<b>Timing</b>
11. Improved monitoring of supply	Immediate and ongoing
12. Improved Scheme infrastructure to enable connection with participants	Immediate
13. Improved provider portal and pathway	Immediate and ongoing
22. Greater monitoring of self-managed participants	Immediate and ongoing
23. Assessment of readiness for deregulation	Immediate and ongoing
24. Comprehensive market data	Immediate and ongoing

### **Price Limits**

<b>Recommendation</b>	<b>Timing</b>
5. Single National Price Guide	Medium term
7. Add price tier that accounts for complexity of supports	Immediate
9. High intensity loading for center based activities	Immediate
10. Short-Term Accommodation	Immediate
14. Temporary Support for Overheads (TSO)	Immediate
16. Group supports	Immediate

### **Supporting Interventions**

<b>Recommendation</b>	<b>Timing</b>
2. Outcomes based pricing	Medium term
3. Coordinated responses	Medium term
4. Regional travel	Immediate and Short-term
6. Defining Complexity	Immediate
8. Quoting for extremely complex	Short-term
15. Cancellation policy for core supports	Immediate
17. Therapy price limits	Immediate
18. Therapy Assistants	Immediate
19. Therapy travel	Immediate
20. Cancellation policy for Therapy	Immediate
21. Reports requested by NDIA	Immediate
25. Trialing deregulation	Medium term

Section 2.3 below provides more detail on the NDIA's response to each recommendation.

To support implementation, the NDIA will establish a Pricing Committee, which will oversee ongoing monitoring of price controls. The NDIA will ensure that expert pricing advice is available to the Pricing Committee and will also tap into provider consultative mechanisms.

Specifically, this Committee will be responsible for ensuring that the NDIA's ongoing price control review program considers:

- Whether price controls remain necessary for specific groups of supports and services; and if so,
- Which price controls (that is, price limits, benchmarks, and/or rules) are appropriate, taking into account other measures the NDIA can take to improve market performance; and,
- What level these controls should be set at in order to protect the value participants receive from their plans, while allowing efficient providers to recover their costs.



## 2.3 Detailed responses

This section contains a high level summary of each recommendation and the NDIA's proposed implementation strategy and timing.

Recommendation	Timeframe	Approach
<p><b>Recommendation 1</b></p> <p><i>“Include a broader set of indicators of participant outcomes and market development in its price setting process, and clarify its methodology for implementing price setting decisions.”</i></p>	Immediate	<p>The IPR sets out four steps for monitoring market development.</p> <p>This will be implemented immediately and monitored on an ongoing basis.</p>
<p><b>Recommendation 2</b></p> <p><i>“Continue to use an hourly rate approach, but trial outcomes-based pricing.”</i></p>	Medium Term	<p>The IPR recommends the NDIA should consider alternative approaches to unit based price controls, and move towards outcomes based funding where appropriate.</p> <p>The NDIA will undertake consultation with the sector to inform a more comprehensive view on how this might work and where it would be appropriate as part of its Price Review.</p>
<p><b>Recommendation 3</b></p> <p><i>“In very remote/isolated areas, work with other community services and providers to support local workforce development to deliver services in the most efficient way possible. In regions with limited local supply, allow providers to quote on cost of delivering NDIS services in the short term to ensure supply.”</i></p>	Medium Term	<p>The IPR recommends that the NDIA should consider a quoting approach reasonable in circumstances where local supply is unlikely to form to maintain critical supports in the short-term.</p> <p>The NDIA will undertake further consultation to develop coordinated responses with other community services and appropriate quoting measures.</p>
<p><b>Recommendation 4</b></p> <p><i>“Clearly define rural areas and lift travel allowance from 20 minutes to 45 minutes for providers serving a participant located in MM5 (or ARIA equivalent) and MM4 in the short term. Adjust participant plans to account for travel and track travel as a separate line item.”</i></p>	Immediate & Short- Term	<p>The Report highlights participants who do not live in a metropolitan areas, but are not considered remote, may have difficulty accessing certain supports. The NDIA considers the recommendation for a change to travel claiming rules for participants living in regional communities reasonable.</p> <p>This change will be implemented as part of the Price Guide for 2018-19.</p>
<p><b>Recommendation 5</b></p>	Medium Term	<p>The Report suggests the NDIA progressively converge price limits across states to promote simplicity and efficiency for providers.</p>

<b>Recommendation</b>	<b>Timeframe</b>	<b>Approach</b>
<i>“Converge the two Price Guides and move toward a single national price guide by 2021.”</i>		The NDIA will implement this recommendation over the next two to three years to allow providers time to move to the Social, Community, Home Care and Disability Services Industry Award.
<b>Recommendation 6</b> <i>“Develop a definition for complexity linked to the skills required to meet participant’s needs, and use specialised planning resources to classify what skills are required, and which participants require higher skilled support workers.”</i>	Immediate	The Report highlights that the definition of complexity is inconsistent across the NDIS and that the current two-tiered approach to assessing complexity is insufficient for participants with more complex needs.  As part of its Pathways work, the NDIA is establishing specialist planning teams which will significantly improve the NDIA’s ability to develop plans that account for the various levels of complexity that exist for participants.
<b>Recommendation 7</b> <i>“Add an additional tier to the high intensity loading to allow a provider to recover the cost of a support worker with a higher level of skill than can be procured with the current high intensity loading”</i>	Immediate	The Report suggests an additional tier of “Very Complex” would help providers recover the cost of supporting more complex participants.  Implementation of this recommendation will be informed by, and implemented after, Recommendation 6.
<b>Recommendation 8</b> <i>“Develop a consistent process for participants with extreme behaviors of concern that acknowledges the specialised needs of the participant cohort, and the environment providers operate in. Providers serving this cohort should quote on the delivery of services to these participants, and also be allowed to deliver all services they require to be adequately supported i.e. all Support Coordination items.”</i>	Short Term	The Report suggests that the NDIA further analyses the current restriction preventing providers from delivering support coordination while also being the participant’s service provider.  While this could be a sensible option for some participants, the NDIA will ensure that safety and welfare issues arising from a single provider model are addressed. Options for implementing this change will be investigated in the second half of 2018.
<b>Recommendation 9</b> <i>“Update the pricing structure for the core support item ‘Group based activities in a centre’, to allow providers to charge a high intensity loading where a more skilled worker is required to serve a participant, and set prices consistent with the care ratio required to serve a participant.</i>	Immediate	Providers are currently not able to charge a high intensity or complexity loading for group based supports in a centre, which is inconsistent with other core supports.  This recommendation is supported and will be implemented by July 1, 2018.
<b>Recommendation 10</b> <i>“Continue to refine the assumptions for high intensity rates, active overnight, and capital</i>	Immediate	This recommendation addresses the updates made to price limits for short-term accommodation (STA), effective 30 October 2017. The NDIA plans to evaluate the appropriateness of STA price limits, including the accommodation rate, on an ongoing basis.

<b>Recommendation</b>	<b>Timeframe</b>	<b>Approach</b>
<i>allowances used to develop the new STA price schedule, to ensure they reflect the cost of service delivery.”</i>		A review of the impact of these changes will shortly be undertaken.
<b>Recommendation 11</b> <i>“As part of the market intervention strategy, adopt a clear set of metrics to more comprehensively identify and respond to risks of thin markets emerging.”</i>	Immediate and ongoing	The Report highlights that a clear set of metrics and data sources would help improve market monitoring capacity and transparency of decision making by the NDIA. This recommendation is supported and will be implemented immediately and maintained on an ongoing basis.
<b>Recommendation 12</b> <i>“Invest in Scheme infrastructure such as an e-market tool, which would empower participants in thin or undersupplied markets to find suitable providers.”</i>	Immediate	The Report suggests the NDIA establish an e-market tool, and improve options for participants to find support, compare prices and interact with providers. The NDIA is currently enhancing a Provider Finder, allowing participants to search and compare providers. The Provider Finder will be implemented following a review of the ACT Provider Finder Pilot in the first half of 2018.
<b>Recommendation 13</b> <i>“Prioritise the implementation of measures to continue to improve the NDIA’s portal, responsiveness and communication as part of the Participant and Provider Pathway Reviews.”</i>	Immediate and ongoing	Concerns raised during the IPR consultation process have highlighted a range of areas the NDIA should address in relation to the portal, Agency responsiveness and communications. The NDIA acknowledges these issues and is addressing them as part of the Participant and Provider Pathways work. This work is currently underway and the portal is a priority area.
<b>Recommendation 14</b> <i>“Implement ‘temporary support for overheads’ (TSO) in the form of a temporary increase in the price cap for standard intensity attendant care. Government should offer business planning support for large providers that would otherwise exit and create the risk of supply shortages.”</i>	Immediate	The IPR identified that many providers needed time and support to become more efficient. The Report recommends a Temporary Support for Overheads (TSO) to support providers in transition, with the presumption of a 12 month period to allow providers to adjust. The NDIA supports the temporary transitional support overhead for a period of 12 months and it will be applied as part of changes made to the Price Guide for 2018-19. Further work will be undertaken and defined to allow providers to understand how this will be unwound.
<b>Recommendation 15</b> <i>“Amend the cancellation policy for attendant care so that up to a certain threshold, providers can charge against a participant’s plan for up to 90% of the entire duration of the scheduled service if the</i>	Immediate	The Report suggests that there is a need to distinguish cancellations made in advance from those made on short notice, (after 3pm the day before). Should a provider be able to find the support worker another shift to recover costs, no cancellation would be charged. Additionally, providers would be compelled to demonstrate they are working with participants that cancel frequently to improve their ability to make appointments.

Recommendation	Timeframe	Approach
<p><i>participant makes a short notice cancellation. Above this threshold, providers will need to demonstrate they are actively working with participants to minimise the risk of cancellations in order to continue charging for cancellations.”</i></p>		<p>The NDIA will implement this change as part of updates to the Price Guide for 2018-19. The NDIA will continue to monitor this change and work with providers and participants to support those that might be more likely to cancel appointments on short notice due to their disability or complex family environments.</p>
<p><b>Recommendation 16</b></p> <p><i>“Implement a new pricing schedule for group care (both community based and centre based) that allows providers to recover additional costs incurred for groups, while still retaining the incentives and efficiencies of group based care. Also assess whether a capital allowance should be provided for centre based care on whether there is demand to increase the number of centres.</i></p>	<p>Immediate</p>	<p>The Report suggests that the current price limits for group supports do not allow for sufficient flexibility in group care arrangements.</p> <p>This recommendation will be implemented as part of changes made to the Price Guide for 2018-19.</p>
<p><b>Recommendation 17</b></p> <p><i>“Develop differentiated price levels for physical therapy and psychological therapy based on price levels being paid in comparable schemes.”</i></p>	<p>Immediate</p>	<p>The Report highlights that a single price limit is not reflective of the diverse nature of therapy supports offered under the NDIS. Additionally, this recommendation advocates the separation of physical and psychological supports.</p> <p>The five tiers recommended will be implemented as part of changes made to the Price Guide for 2018-19.</p>
<p><b>Recommendation 18</b></p> <p><i>“Amend the description for therapy assistants and introduce two tiers of prices for therapy assistants – one that is comparable to the attendant care price, and a second that is for the delivery of therapy supports by a professional with a lower level of skill than a qualified therapist.”</i></p>	<p>Immediate</p>	<p>The Report suggests that increasing the price limit, and the inclusion of a second tier of therapy assistant, will result in improved participant outcomes.</p> <p>The NDIA endorses this proposed change and will implement it as part of changes made to the Price Guide for 2018-19.</p>
<p><b>Recommendation 19</b></p> <p><i>“Align the travel policy for therapy supports to the travel policy for attendant care by removing the \$1000 travel cap, allowing providers to charge up to 20 minutes at the hourly rate when travelling between participants.”</i></p>	<p>Immediate</p>	<p>The Report recommends the travel policy for therapy supports be aligned with that of attendant care, also suggesting removal of the \$1000 travel cap.</p> <p>The NDIA endorses this proposed change and will implement it as part of changes made to the Price Guide for 2018-19.</p>

<b>Recommendation</b>	<b>Timeframe</b>	<b>Approach</b>
<p><b>Recommendation 20</b></p> <p><i>“Amend the cancellation policy for therapy so that up to a certain threshold, providers can charge against a participants plan for up to 90% of the scheduled service if the participant makes a short notice cancellation. A cancellation line item should be created as a governance mechanism for the NDIA.”</i></p>	Immediate	<p>The Report suggests distinguishing cancellations made in advance from those made at short notice.</p> <p>The NDIA will implement this change as part of updates to the Price Guide for 2018-19. The NDIA will continue to monitor this change and work with providers and participants to support those that might be more likely to cancel appointments on short notice due to their disability or complex family environments.</p>
<p><b>Recommendation 21</b></p> <p><i>“The NDIA should allow providers to charge participants for the time spent writing reports that are requested by the NDIA. A new line item should be introduced for tracking purposes.”</i></p>	Immediate	<p>The Report suggests that the NDIA allows providers to claim for time spent writing reports that are requested by the NDIA.</p> <p>The NDIA endorses this proposed change and will implement this as part of changes made to the Price Guide for 2018-19.</p>
<p><b>Recommendation 22</b></p> <p><i>“Collect and analyse information on the experience of self-managed participants to help inform its assessment of price deregulation.”</i></p>	Immediate and ongoing	<p>The Report recommends the NDIA continue expansion of data collection and analyses to improve the ability to understand supply and demand dynamics in the less regulated self-managed participant markets.</p> <p>This approach will be incorporated into the market stewardship function, with aims to expand as this function matures.</p>
<p><b>Recommendation 23</b></p> <p><i>“Collect information on and assess the readiness of participants and providers for deregulation.”</i></p>	Immediate and ongoing	<p>This recommendation suggests the NDIA collect information specifically to support consideration of the timing for market deregulation</p> <p>This approach will be incorporated into the NDIA’s market stewardship function, with aims to expand as this function matures.</p>
<p><b>Recommendation 24</b></p> <p><i>“Provide more comprehensive market data to support the development of provider and participant capacity.”</i></p>	Immediate and ongoing	<p>This Report suggests the NDIA use data to educate the sector, while improving regular reporting through existing mechanisms such as Market Position Statements.</p> <p>The NDIA will incorporate this into its approach to build market capacity as the NDIS is rolled out.</p>
<p><b>Recommendation 25</b></p> <p><i>“Pursue a trial of price deregulation in one market, once the preconditions for deregulation have been satisfied.”</i></p>	Medium Term	<p>The Report advocates trialing deregulation of price limits by support type or regions, once the market meets certain conditions.</p> <p>The NDIA supports this recommendation as soon as it is feasible.</p>