

**Discussion Point 1: More Choice for Participants**

1. *What, if any, restrictions should there be (for example, region or distance) on participants choosing to attend a provider?* None, participants should have complete autonomy over provider choice.
2. *How often should participants be allowed to voluntarily transfer or switch providers?* 4 times per calendar year
3. *What should be the basis of referral by Centrelink for participants who do not choose a provider?* Choose the most appropriate provider based on the participants disability and career aspirations.

**Discussion Point 2: Provider/Participant Contacts**

1. *Should face-to-face requirements remain as part of the DES service delivery?* No, participants should be given a choice between face-to-face, phone and online (eg skype, zoom or similar)
2. *How often should participants and providers be required to meet, either face-to-face or by other means?* This should be determined on a case-by-case basis and be at the discretion of the provider and the participant.

**Discussion Point 3: Job Plans**

1. *Should Job Plans have minimum requirements beyond what is necessary for mutual obligation requirements? Or should this be determined between each participant and their provider?*  
Determined between each participant and their provider
2. *How can we ensure that participants are actively involved in the development of their Job Plans, or will the ability of participants to change providers if unsatisfied be sufficient?* Education of participants about their obligation to be actively involved in the development of their plan. This can be done through face-to-face discussions and also through a printed / electronic factsheet outlining what this involves.
3. *How should providers be held accountable to ensure activities in the Job Plan are undertaken and supports are delivered? Will the ability of participants to change providers if unsatisfied be sufficient?*  
Regular (bi - monthly) electronic surveys of participants to elevate provider performance.

**Discussion Point 4: Better Information for Participants**

1. *What information should be available to participants, providers and employers?* As per those outlined in the discussion paper. If the participant is agreeable, information about their disability should be given to the employer along with general information about the proven benefits of employing people with a disability.
2. *Should there be mechanisms to ensure no false or misleading claims are made against DES providers?* Yes

3. *Should the Department facilitate access to information on accessible and user friendly platforms, or should this be purely market led (with providers offering such information on platforms of their own choosing)?* Department should facilitate to ensure it is uniform across the sector.

#### **Discussion Point 5: Participant Controlled Funding**

1. *There is considerable literature and experience in participant controlled funding in personal care. Is there any evidence of the effectiveness of participant control of third party funding in employment services?*

Whilst direct control and ultimate approval should remain with the DES, the individual should have more of a say in how the funding should be spent thus benefiting the individual given their goals.

2. *In such a model, how much funding, if any, should be quarantined for job seekers to use through an account, how should this funding be made available to participants, and how could there be simple clarity as to what costs are to be met from participant controlled funds versus provider controlled funds?*

At least 70% of the funding allocated to an individual job seeker should be quarantined to solely assist that individual job seeker. Strict guidelines need to be centrally developed by the Department and implemented uniformly across the network of providers relating to what the money can be spent on. The development of these guidelines needs to take into consideration that not all job seekers are interested in blue collar or entry level positions and that some job seekers are in fact capable of much higher positions. The job seeker needs to be informed as to how much money is quarantined for them and should receive documentary evidence on how funds are spent on a regular basis in order to ensure accountability.

3. *What principles should guide the appropriate expenditure of any individualised funding?*  
Direct relevance to the type of job that the job seeker is aspiring to.

4. *What restrictions should apply to the use of the funds by participants?*  
No personal expenses. Job seeker must demonstrate commitment.

5. *How can participants who are unwilling or unable to use individualised funding be supported during the decision making process?*  
Education or involvement of an impartial third party to ensure best interests of the participants are duly considered

6. *What restrictions should apply to the expenditure of the funds on services from a participant's provider or an associated organisation?*  
More stringent reporting and therefore accountability on how monies are spent.

#### **Discussion Point 6: Entering the DES Market**

1. *How often should the Panel be open to entry by new providers?* Every 12 months

2. *How often should panellists be reviewed and what criteria should they be reviewed against?*  
Every 12 months. Employment outcomes (emphasis on long term employment), satisfaction of clients (job seekers), complaints received (incl severity/significance of complaints).

3. *What should the basic criteria be for joining the Panel?* Ability to network with a wide range of potential employers offering jobs for a wide range of job seekers from entry level to high level management/ qualified white collar employers.

4. *How much time do providers need before entering into a market to set up their operation?* 6 months

5. *In order to supply DES in a specific ESA what should the requirements be for:*

a. *a minimum caseload?* Depends on location and type of disability they specialise in

b. *ESA coverage?* Depends on location

### **Discussion Point 8: Removing Market Share Restrictions**

1. *What mechanisms should be adopted to ensure universal coverage in an ESA while maintaining a competitive marketplace?* Completely remove market share restrictions and allow job seekers to choose their provider. In order for this to be effective job seekers will require access to information regarding provider performance as well as provider speciality.

2. *How should provider diversity be maintained to ensure participants have adequate choice of provider?*

Actively encourage more providers (especially already established 'mainstream' providers) to join the network.

### **Discussion Point 9: ESAs**

1. *Should there be ESAs, if so, how many ESAs should there be?* 51

2. *Should the number of ESAs be reduced if market share is removed?* Yes

### **Discussion Point 11: Ratio between service fees and outcome fees**

1. *What should the ratio between service fees and outcome fees be and why?*

Based on the evidence provided the ratio should remain at 50/50. I feel that lowering the outcome fee ratio and increasing the service fee will discourage the providers from finding the participants work but I am also cautious that positive outcomes for some job seekers might never be achieved.

### **Discussion Point 12: 4-week and 52-week Outcome Payments**

1. *What should constitute an employment outcome under DES in a modern Australian economy?*

Employment gained in a suitable full – time, part-time, casual or seasonal job expected to last for at least 12 weeks.

2. *How should the DES funding model incorporate the growing number of short term jobs available in the economy?* Assuming that the current model assumes that the person will be employed for at least 12 months, proportional time periods could be calculation for short term/ seasonal employment.

3. *Should the new model replace the job placement fee with a 4-week outcome payment, and how many 4-week outcome payments should be available for each job seeker? Yes, limit of 3 per calendar year.*

4. *How should job seekers be supported in the period between the 26-week outcome and the 52-week outcome? Email support / monthly email check in*

5. *What level of payment should be attached to the 52-week outcome while keeping total DES expenditure within the current funding envelope? 26 week outcome fee should be halved with remainder paid at 52 week time period.*

### **Discussion Point 13: Service Fees**

1. *How should service fees work in the context of a funding model with risk-adjusted outcome fees? Fee should be determined based on the type of employment the job seeker is aspiring for.*

### **Discussion Point 14: Pro-rata service and outcome fees**

1. *How should pro-rata service and outcome fees be calculated? Strict pro rata based on the number of weeks participant spends with that provider. Service fees must be paid back within 2 weeks of participants ceasing involvement with the provider.*

2. *How should pro-rata fees apply in the event that a provider ceases to be a member of the Panel? Provider should receive a pro rata fee based on the number of weeks they were a member of the panel for.*

### **Discussion Point 15: Determining Eligibility and Employment Outcomes for ESLs**

1. *Who should be able to qualify under revised assessment criteria for ESL? All grade 12 students who have a disability should have a right to access these services. Those students who wish to pursue tertiary education may not wish to be registered but all students should have the opportunity and right to access this service.*

2. *How could the level of disadvantage and work capacity be assessed for secondary school students? Assessment of work capacity should be based on a report written by the schools 'disability officer' or the Head of Senior Schooling.*

### **Discussion Point 16: Improving the Gateway**

1. *How can gateway arrangements be improved to enable a better connection to employment services for people with disability? Firstly, there needs to be a way in which people who have a disability but are not receiving a DSP can easily register with an DES Provider. Secondly, for those people who are receiving a DSP but who are capable of employment there needs to be clearer guidance around the impacts of employment on their pension with an emphasis on the benefits of employment and the types of support DES providers can offer.*

### **Discussion Point 17: Assessments Review**

1. *What other aspects of ESATs/JCAs should be examined in the review?* Based on personal experience I know how inconsistent ESATs and JCA's can be. Any review should seek the opinions of the people being assessed and the assessors. It should also keep in mind the need for the emphasis to be on what a person can do as opposed to what they can't do (although limitation cannot and should not be ignored). In order for this to fully occur I feel that the ESAT/JCA performed to assess employment should be different from that used to determine DSP eligibility.

2. *Should there be:*

a. *greater separation of ESATs and provider's own assessments, with ESATs focused on eligibility, work capacity and appropriate referral within DES and not extending to suggested interventions?*

OR

b. *should ESATs be developed and extended to provide more and better information on which providers could base their assistance, with less need to perform their own assessments?*

B -refer also above

3. *How should the revised assessment process fit with other options for DES reforms outlined in this Discussion Paper?*

No comment.

### **Discussion Point 18: Ongoing Support**

1. *Should the fee-for-service funding model specify minimum contacts and hours of support?* No, contact and hours of support should be determined on a case-by-case basis with the main emphasis being on the job seekers preference.

2. *What minimum servicing requirements should there be for each level of support?* This needs to be dependent upon the level of support that each Individual client requires.

3. *How should payments be determined for each level of support?* All levels should be funded on a fee-for-service basis but the changes need to be clearly communicated to the providers to ensure that the level of service provided to the higher-level clients is not reduced in any way.

### **Discussion Point 19: Job-in-Jeopardy**

1. *How can we better define when someone's employment is considered to be at risk due to their disability?* ?????

2. *How can we increase employer awareness of JIJ?* Information sheet sent to all employers through the ATO newsletter system. As well as a TV, Radio & social media advertising campaign

3. *Does the current fee structure reflect the services being provided and outcomes being achieved?* Insufficient information provided to ascertain.

4. *What is a more appropriate name for Job-in-Jeopardy?* Support for current employees with a disability/health condition

5. *If a JIJ participant chooses not to disclose their disability to an employer, how should providers assist them in the workforce?* Encourage disclosure.

6. *Should the JIJ service be integrated with Ongoing Support?* Yes, providing it doesn't result in a drop in service for either program.

#### **CHAPTER 8 – additional comment**

It is vital to ensure that any marketing campaign also targets employers of “professional” jobseekers such as Accountants, Lawyers, Graphic Designers, etc. as my personal experience shows that DES Providers do not usually engage with those types of employers even when they have job seekers who are qualified and able to work in the above-mentioned fields.

#### **Discussion Point 20: Transition Issues**

1. *How can we ensure that DES providers continue to provide quality services to participants towards the end of the current contracts?* Through open and honest communication with participants and DES providers throughout the lead up to and during the implementation of the changes.