

**Submission on behalf of Alliance20 to the Discussion Paper:**

***Improving the NDIS Experience: Establishing a Participant Service Guarantee and removing legislative red tape.***

**ABOUT ALLIANCE20**

Alliance20 brings together 21 of Australia's largest and most influential disability service providers to work with Governments, the National Disability Insurance Agency (NDIA) and others to shape the National Disability Insurance Scheme (NDIS) for a future that enables choice, ensures value, minimises complexity and delivers better outcomes.

Collectively Alliance20 supports around 75,000 people with disability in every state and territory, has over 30,000 staff working directly in disability services and represents around \$2 billion in funding for disability services. Drawing on the unparalleled collective experience of members, Alliance20 is focused on shaping and influencing the development of NDIS policy and processes to support the long term objectives of the scheme for the benefit of people with disability in Australia.

**1. Alliance20 supports the introduction of a service guarantee**

In providing comments in response to the Discussion Paper, Alliance20 would like to say at the outset that we support the introduction of a Participant Service Guarantee. A service guarantee would provide more transparency as to what expectations a participant should have and will work towards a more consistent and improved quality of service delivery by the NDIA.

**2. The NDIA and its Board should report directly to the Minister for the NDIS**

The current Minister is clearly dedicated to the success of the scheme however, the Alliance believes that greater effectiveness would be achieved if the current reporting lines for the scheme through the Department of Social Security (DSS) is changed. In the successful similar schemes that operate at a state level the Life Time Care in NSW and the Transport Accident Commission in Victoria the Board and management report directly to a Cabinet-level Minister.

It is important to note in making this recommendation that it is not a reflection on either the competence or motivation of the DSS and its officers but rather we are noting that the culture and policy reflex of an agency such as DSS and indeed the Department of Human Services with long histories of overseeing and operating entitlement based schemes do not have the policy disposition to advise on the implementation and maintenance of a "person centred" scheme like the NDIS.

As well as the policy risks created by the DSS reporting line there are financial risks to government as DSS advice is creating a “catalogue/entitlement” approach to the scheme which will be costlier than the person-centred approach over time.

### **3. Supporting a sustainable open market**

Alliance20 supports the continuation of a market that is sustainable both for the government and for service providers and gives effect to the core principle of the NDIS which is personal choice for participants. The pricing of services must continue to move towards pricing not being set by regulation but by clients choosing the type and quality of service they are seeking. It is important that relative pricing is a consideration in planning decisions from the viewpoint of scheme efficiency, provider viability and client choice.

At the same time the pricing must be sufficient level to allow agencies that supply most disability services to be sustainable in the long term and to provide a quality service to participants, particularly those with complex needs.

### **4. Input by providers in supporting participants in the planning process**

Many people with disability, especially people with high and complex needs have long, close and well-established relationships with their service providers. Initially, the planning process excluded service providers from assisting participants with their plan development and reviews.

We acknowledge that this view has changed over time, but we still have case after case where participants are not comfortable and have not understand how they can bring service information and seek detailed input from their provider to assist with their plans. We believe planners should regularly ask if participants want to have people from their service provider provide input to their planning sessions.

The planning process for individual participants would be greatly enhanced by the support and input of their existing providers. In particular participants with high and complex needs may have long term relationships with a provider and that provider has the expertise, knowledge and familiarity with the needs of the client to make the process easier and to create a better outcome.

The lack of existing service provider input to planning and service allocation, is disadvantaging participants who have no other representation and do not receive family support. For people with complex support needs, this issue often limits the information provided to the NDIS for assessment.

### **5. Support for Longer Participant Plans**

For many people with disability, considerations about life outcomes extend well beyond an annualised planning cycle. Planning will be more effective with the capability to have a 3- or even a 5-year planning horizon with suitable safeguards in place.

The implementation of longer plans should be developed in partnership with participants, providers and the NDIA.

Effective planning brings together the supports, goals and aspirations a participant wants. Central to longer plans is a planning process that strengthens, enables and supports participants to exercise optimum choice and control. The NDIS plan review and implementation process, can be complicated for both participants and providers.

Longer plans provide the opportunity to further streamline the planning process and reduce the administrative burden for everyone involved. For participants in particular, this will provide a greater emphasis on goal achievements shifting focus on living their lives, rather than the level of funding. Three-year (or longer) plans provide the opportunity to lay the framework for a more dynamic planning process which can be more flexible, greater recognition of individual difference (both in life choices and life stage of the participant) and responsive to change.

## **6. Improved appeal process with the introduction of an external independent reviewer**

Currently there is provision for an internal review when a client is dissatisfied with a decision of the NDIA. If the Internal review does not settle the matter, the only recourse is to the Administrative Appeals Tribunal (AAT). Currently there are a large number of NDIA cases backlogged in the AAT.

Alliance20 proposes the use of an external independent reviewers capable of conciliating matters between the Agency and the client. Such an approach is preferable, in the context of the person-centred nature of the scheme. It would also result in quicker and simpler decisions at a lower cost to the client and the Agency. We recommend that the NDIA empanel a group of private arbitrators' and/or conciliators to deal with matters that cannot be resolved without assistance between the NDIA and the client.

The NDIA would need to develop appropriate guidelines to train the independent arbitrators in the operation of the scheme. A suitable cost regime would also need to be developed.

## **7. Building capability in the NDIA to adequately provide its services and provide timely responses and payments**

The current limitations on the NDIA is the origin of many of the initial problems with establishment of the scheme. The government's staffing and costing caps were initially developed to contain cost blowouts in established departments with many years standing and is not appropriate for a newly established agency such as the NDIA.

Staffing levels and capabilities in the NDIA remain a barrier to effective operation of the scheme both for clients and providers. The budgetary staff cap applied to both Transport Accident Commission and Life Time Care schemes dealing with complex clients and providers could be used as benchmarks for the NDIA.

We recommend a review of the staff cap to a more realistic level based on the operational requirements of the scheme rather than an arbitrary benchmark.

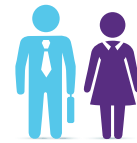
# Members Overview



**\$2 Billion**  
in disability funding



**75,000+**  
clients supported



**30,000+**  
employees



**1,800 service locations**  
in all states/territories  
around Australia



**All members**  
are leading disability not-for-  
profits or mutual organisations  
providing a range of services



**All support clients**  
with complex needs



**Supported Independent Living**  
services provided



**Short Term Accommodation (Respite)**  
services provided



**Lifestyle Supports**  
and skills building  
services provided



**Employment**  
services provided



**Allied Health**  
services provided



**Therapy**  
services provided

## Member organisations



# We operate in all states and territories in Australia



**arUma.**  
Disability services. Putting you first.



**achieve**  
australia  
building extraordinary lives



**Australian Unity**



**Bedford**  
Changing Lives



**benevolent** SOCIETY



**Cerebral Palsy ALLIANCE**



**CHALLENGE**  
Community Services



**Disability Services Australia**  
choice, inclusion, achievement



**NDVR**  
Endeavour Foundation



**LIFE WITHOUT BARRIERS**



**Lifestyle Solutions**



**mcm.**  
melbourne city mission  
your future, your way



**mind**  
Help, hope and purpose



**120 minda**



**novita**



**Possability**  
Nurturing potential.



**Rise**  
celebrating people



**Southern Cross SUPPORT SERVICES**



**Somerville**  
the courage to be ...



**Sunnyfield disAbility Services**



**Sylvanvale**

