

Submission to Department of Social Services about establishing a Participant Service Guarantee and review of the NDIS Act

October 2019

About the Submitter

JFA Purple Orange is an independent, social-profit organisation that undertakes systemic policy analysis and advocacy across a range of issues affecting people living with disability and their families.

Our work is characterised by co-design and co-production and includes hosting a number of user-led initiatives.

Much of our work involves connecting people living with disability to good information and to each other. We also work extensively in multi-stakeholder consultation and collaboration, especially around policy and practice that helps ensure people living with disability are welcomed as valued members of the mainstream community.

Our work is informed by a model called Citizenhood.

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2

Contents

1.	Summary and recommendations			5
2.	Int	rodu	ction	. 10
3.	Ou	r app	roach to writing this submission	. 11
4.	Res	spons	se to the Discussion Paper	. 11
4	.1.	Prir	nciples for NDIA service standards	. 11
	4.1	1.	Valued – Participants, their families, carers and other support persons feel	
	val	ued k	by the NDIS and know where to go if they need more assistance	. 12
	4.1	2.	Engaged – The NDIA engages with people with disability, their family, carers	
	and	d oth	er support persons when developing operating procedures and processes	. 12
	4.1	3.	Expert – NDIA staff have a high level of disability training and understands the	he
	imį	pact p	particular disabilities have on people's lives. They understand what supports a	are
	mo	st ef	fective for a person's disability	. 13
	4.1	4.	Decisions are made on merit – The NDIA acts in a transparent, informative a	nd
	col	labor	rative spirit so that participants understand why decisions are made	. 13
	4.1	5.	Accessible – All people with disability can understand and use the NDIS, and	
	the	NDI:	S ensures its services are appropriate and sensitive for Aboriginal and Torres	
	Str	ait Isl	ander people, people from Culturally and Linguistically Diverse (CALD)	
	bad	ckgro	unds, LGBTQIA+ and other individuals	. 14
4	.2.	NDI	IS eligibility and application	. 14
	4.2	2.1.	Current challenges	. 14
4	.3.	Cre	ating plans	. 17
	4.3	3.1.	Current challenges	. 17
4	.4.	Usi	ng and reviewing plans	. 20
	4.4	.1.	Current challenges	. 20
4	.5.	App	pealing a decision by the NDIA	. 22
	4.5		Current challenges	

	4.6.	Legislative changes	23		
	4.7.	Plan amendments	23		
5.	Con	clusion	24		
6. Appendices					
	6.1.	Attachment A: Potential ideas for Participant Service Guarantee Service Standard	ls		
	(for di	scussion)	25		

1. Summary and recommendations

While the NDIS is having a positive impact on the lives of many participants, a number of issues need to be addressed to ensure the participant experience runs efficiently and in line with the objectives and core principles of the Scheme. It is vital that participants are able to exercise choice and control, are adequately involved in the decision-making process, and are treated with dignity and respect. NDIS participants should be able to expect a consistently high standard of service and support and the proposed principles and service standards are a key component in moving towards this.

We recommend:

Recommendation 1

That participants are kept informed of timelines by the NDIA once a process is underway, such that should there be delays or lengthy wait times the participant is able to be informed of what this is likely to amount to.

Recommendation 2

That a process is established around recruitment, induction, ongoing professional development, and performance review of NDIS personnel which is consistently anchored on a strengths-based approach to participant engagement and planning

Recommendation 3

That the service standard relating to the principle 'engaged' should refer to the existence of formal consultation and feedback mechanisms as part of the overall principle of engagement.

Recommendation 4

That the wording relating to the principle 'expert' be more descriptive and more aspirational, such as. 'what supports are most effective to help participants pursue their goals.

That the service standard relating to the principle 'decisions are made on merit' should refer to a commitment to consistency with decision-making processes across the Scheme.

Recommendation 6

That the following additions to the service standard relating to the principle 'accessible' are considered:

- an explicit commitment around accessibility of communications (such as Easy English versions of documents, accessible websites, and tagging of documents for screen readers)
- 2. an explicit commitment around accessibility of NDIA and community partner offices/venues
- 3. a commitment that this service standard will relate to at least XX% of communications and venues/locations meeting various accessibility criteria

Recommendation 7

That the standardised letter informing people that their Access Request has been rejected provides specific reasons for rejection and details subsequent courses of action such as what information would be required to reapply successfully and how people can be supported in reapplication.

Recommendation 8

That the NDIA directly provide resources to primary healthcare providers such as GPs on how to complete access request forms; this could include online resources, written information, and/or specific training sessions.

Recommendation 9

That the NDIA provide more detailed guidance on the evidence required and its recency e.g. what type of functional assessment required.

That the NDIA publish example access request form online so that people can see what is required.

Recommendation 11

That there is increased funding provided for community mental health providers to assist people living with psychosocial disability with transition and/or testing of their eligibility for NDIS participation.

Recommendation 12

That a standardised mechanism be built into a participant's initial plan to reimburse costs associated with gathering evidence for application to scheme if successful.

Recommendation 13

That there is provision of individualised funding for independent pre-planning support to ensure that participants are thoroughly prepared for their planning meeting.

Recommendation 14

That a single point of contact with contact details for that staff member is established for each participant, plus alternative contacts if person away. One way this could be achieved is through assigning a small team of LACs with a primary contact for each participant.

Recommendation 15

That a draft plan is shared with the participant prior to being finalised, and that this is available for them to take away to review. This also provides a chance to raise anything forgotten about during the planning meeting. Further, this would provide the participant with opportunity to send through amendments or request a second meeting to be held within a set amount of days (perhaps 7 days is reasonable).

That the NDIS arrangements include an auditable mandatory mechanism for continuing professional development of planners, where a given volume of development time is undertaken by each planner in order to maintain their eligibility to provide a planning service.

Recommendation 17

the plan start date should commence from when the plan is activated and not from planning meeting date to ensure that participants have the full 12 months to utilise their funding.

Recommendation 18

That there is opportunity for regular contact between LAC/planner and participant over the life of the plan to check in on progress in utilising supports and achieving goals; we suggest this frequency is agreed between participant and LAC during the initial meeting and recorded on a participant's plan.

Recommendation 19

That the NDIA require all LACs/ planners to contact participants four to six weeks prior to any scheduled meetings with a status/progress update or summary, to ensure they are informed and prepared.

Recommendation 20

That a case manager is appointed for every appeal or review and that the participant is informed of who this is and how they can be contacted throughout the process.

Recommendation 21

That a system is established whereby the NDIA monitors all decisions of the Administrative Appeals Tribunal and informs all LACs and NDIA Planners of the impact these have on their work.

That a clearer definition of "reasonable and necessary supports" is provided, including a series of examples.

2. Introduction

This submission addresses a number of the key discussion questions set out in the discussion paper for the Department of Social Service's consultation into Establishing a Participant Service Guarantee and review of the NDIS Act. In particular, we have focussed our response towards the following matters:

- what is happening now when participants access the NDIS;
- what is causing delays to access, planning or reviews;
- participants' expectations of the timeframe that reviews should take;
- the principles and standards that the NDIA should have to follow across all stages of access, planning and review; and
- what else might be needed to improve participant experiences of the NDIS.

The thoughts and ideas presented in this submission draw heavily on input received from people living with disability through the following channels:

- 1. A dedicated focus group held in September 2019 on NDIS planning;
- 2. A dedicated focus group held in September 2019 on the Participant Services
 Guarantee with 8 people who live with intellectual disability;
- 3. Leading the facilitation of the South Australian consultations for the Participant Service Guarantee;
- 4. A survey undertaken by more than 100 participants in January 2019 sharing their experiences with the NDIS; and
- Previous consultations undertaken by JFA Purple Orange related to NDIS participation¹

10

¹ These include a community consultation with 36 people on NDIS planning in 2017, and a consultation with over 600 people on NDIS planning in 2015.

3. Our approach to writing this submission

Our submission is structured around the 7 Discussion Paper sections:

- 1. Principles for NDIA service standards
- 2. NDIS eligibility and application
- 3. Creating plans
- 4. Using and reviewing plans
- 5. Appealing a decision by the NDIA
- 6. Legislative changes
- 7. Plan amendments

4. Response to the Discussion Paper

Our response within each of the following sections considers the key questions outlined in the Discussion Paper. For ease of reference, we have included the table of proposed principles and service standards as an attachment to this discussion paper.

4.1. Principles for NDIA service standards

We recognise that the Government has committed that the Participant Service Guarantee will include legislated timeframes and we support this decision. However, we propose that in addition to legislated timeframes it is necessary for NDIS participants to receive clear guidelines around how and when decisions are made, and what the process of consultation and engagement with participants and their supporters will be during these processes.

We agree that it is necessary that the NDIA makes decisions in a timely and responsive manner. We think it is reasonable to suggest that a legislated timeframe is stipulated in days for each key stage of the participant pathway, such as access requests, plan approvals, plan reviews and plan amendments.

That participants are kept informed of timelines by the NDIA once a process is underway, such that should there be delays or lengthy wait times the participant is able to be informed of what this is likely to amount to.

We would like to make specific mention in response to the following aspects of the proposed principles and standards:

4.1.1. Valued – Participants, their families, carers and other support persons feel valued by the NDIS and know where to go if they need more assistance.

We assert that planners and NDIA staff should place the process of engaging with a participant in the context of a strengths-based view of the participant and with no discounting of the expectation that participants can move into rich and fulfilling lives characterised by choice and control and by valued active membership of mainstream community life. Otherwise, if planners and associated staff only see participants, particularly those with high and complex needs, in terms of their impairments and challenges, then the emerging plans are likely to reinforce those persons as recipients of service and not as active valued contributors to community life.

Recommendation 2

That a process is established around recruitment, induction, ongoing professional development, and performance review of NDIS personnel which is consistently anchored on a strengths-based approach to participant engagement and planning

4.1.2. Engaged – The NDIA engages with people with disability, their family, carers and other support persons when developing operating procedures and processes.

We believe that engagement should happen as part of regularly reviewing operating procedures and processes as well as at the time of developing them.

That the service standard relating to the principle 'engaged' should refer to the existence of formal consultation and feedback mechanisms as part of the overall principle of engagement.

4.1.3. Expert – NDIA staff have a high level of disability training and understands the impact particular disabilities have on people's lives. They understand what supports are most effective for a person's disability.

JFA Purple Orange suggests that the wording of 'what supports are most effective for a person's disability' is unclear. Furthermore, this principle could also incorporate the following:

- the notion of getting to really understand participants over time through ongoing contact;
- reference to staff being experts about the NDIS;
- a commitment to regular training involving people living with disability in its design/delivery; recruiting NDIA and related staff with lived experience and from a diversity of relevant backgrounds; and
- Reference to staff completing a sufficient level of continuing professional development;

Recommendation 4

That the wording relating to the principle 'expert' be more descriptive and more aspirational, such as. 'what supports are most effective to help participants pursue their goals, maximise their independence and fully participate in the community'.

4.1.4. Decisions are made on merit – The NDIA acts in a transparent, informative and collaborative spirit so that participants understand why decisions are made.

Recommendation 5

That the service standard relating to the principle 'decisions are made on merit' should refer to a commitment to consistency with decision-making processes across the Scheme.

4.1.5. Accessible – All people with disability can understand and use the NDIS, and the NDIS ensures its services are appropriate and sensitive for Aboriginal and Torres Strait Islander people, people from Culturally and Linguistically Diverse (CALD) backgrounds, LGBTQIA+ and other individuals.

We support the above commitment and we propose the following additions to this service standard:

Recommendation 6

That the following additions to the service standard relating to the principle 'accessible' are considered:

- 4. an explicit commitment around accessibility of communications (such as Easy English versions of documents, accessible websites, and tagging of documents for screen readers)
- 5. an explicit commitment around accessibility of NDIA and community partner offices/venues
- 6. a commitment that this service standard will relate to at least XX% of communications and venues/locations meeting various accessibility criteria

JFA Purple Orange recognises that these service standards will be a key mechanism for measuring how well the NDIA are adhering to these principles. We further recognise that currently NDIA practice is likely falling short of the proposed service standards and therefore acknowledge the value their implementation will add to the participant experience.

4.2. NDIS eligibility and application

4.2.1. Current challenges

As part of the consultations for the Participant Service Guarantee undertaken in Adelaide metro regions and Mount Gambier we heard directly from participants and their families regarding some of the issues they have faced with eligibility and the Access Request Form.

Participants reported a variety of situations and challenges regarding letters of rejection. For example, many people explained that they had received a letter of rejection following submitting an Access Request Form but no indication of the reasons for rejection. This left people feeling confused and anxious about what to do next.

Recommendation 7

That the standardised letter informing people that their Access Request has been rejected provides specific reasons for rejection and details subsequent courses of action such as what information would be required to reapply successfully and how people can be supported in reapplication.

We have heard from several participants that the Access Request Form was difficult for their local general practitioner to complete owing to a lack of instructions or detailed information about what was needed. This was especially frustrating for participants and their families located in rural and remote areas as accessing general practitioners can take more than a week.

Recommendation 8

That the NDIA directly provide resources to primary healthcare providers such as GPs on how to complete access request forms; this could include online resources, written information, and/or specific training sessions.

Other participants spoke of their challenges with gathering evidence/reports/assessments needed from specialists (such as Occupational Therapy, Psychology, or Neurological reports) owing to the scarcity of these providers and lengthy wait times for assessments.

Recommendation 9

That the NDIA provide more detailed guidance on the evidence required and its recency e.g. what type of functional assessment required.

Following a dedicated consultation we held with members of the intellectual disability community we heard that for many people living with Intellectual Disability the Access

Request Form and associated submission process is very confusing. One of the greatest challenges shared was around the fact there is no sample Access Request Form on the NDIA website to be guided by. Hence many people are left wondering what the form looks like and what type of information should be supplied.

Recommendation 10

That the NDIA publish example access request form online so that people can see what is required.

We also heard specific challenges from people living with psychosocial disability. Some reported to us that it can be very hard to prove eligibility to the Scheme owing to the fluctuating and episodic nature of symptoms and a lack of "evidence of permanency."

This was particularly relevant for individuals who have not consistently engaged with healthcare providers except at crisis points.

Recommendation 11

That there is increased funding provided for community mental health providers to assist people living with psychosocial disability with transition and/or testing of their eligibility for NDIS participation.

Finally, it was also reported that for people who are needing to "test their eligibility" it can be very costly to obtain the necessary reports (such as Occupational Therapy, Psychology, or Neurological reports) as these must be paid for in total and with no avenues for reimbursement or support.

Recommendation 12

That a standardised mechanism be built into a participant's initial plan to reimburse costs associated with gathering evidence for application to scheme if successful.

4.3. Creating plans

4.3.1. Current challenges

We have heard several examples from participants of aspects of practical issues related to their experience of NDIS participation.

Overall, participants we have spoken to have described feeling an enormous amount of pressure and stress throughout the planning process, particularly prior to and during their initial planning meetings. One said, "I felt like I was doing an exam, planning my life in half an hour." Another discussed the feeling of responsibility that came with preparing for the planning meeting, stating that "too much onus is put on the person." Participants fear that if they forget to mention something important during their planning meeting it will be omitted from their plan, even if it is set out in the documentation they have provided.

Recommendation 13

That there is provision of individualised funding for independent pre-planning support to ensure that participants are thoroughly prepared for their planning meeting.

Participants have also found it difficult to not have regular contact with one allocated person throughout their NDIS journey. If a participant or family member misses a call from their NDIA Planner or LAC, this is listed as a private number and they are not given a phone number to call back. Family members have told us that they are often busy supporting the participant and cannot answer the phone. The fact that they cannot return the missed call is highly frustrating and inefficient. If the NDIA Planner or LAC does get through, they sometimes expect the participant or family member to be available for a lengthy conversation without any notice, which is not always feasible.

JFA Purple Orange welcomes the NDIA's plan to ensure each participant has a consistent point of contact to discuss their NDIS plan but notes that this will be difficult to achieve given the high rates of staff turnover. It is concerning that when an LAC leaves, the participant is not notified and there is no handover process. We are particularly concerned

by accounts that participants are allocated a different LAC for each new plan, even if they request to remain with the same person. It does not seem logical to allocate a participant a new LAC if the relationship is working well. Participants have told us on several occasions that they would like to receive planning support from someone they know and trust, and who understands their situation. It takes time to get to know someone and build a trusting relationship. The longer an LAC is connected with a participant, the better equipped they should be to provide tailored, relevant advice that meets the participant's needs.

Recommendation 14

That a single point of contact with contact details for that staff member is established for each participant, plus alternative contacts if person away. One way this could be achieved is through assigning a small team of LACs with a primary contact for each participant.

Participants have also told us that LACs and NDIA Planners do not engage properly with participants or accurately reflect their goals and needs in their plans. This came out strongly in the survey we conducted in 2018, with participants explaining that their LACs were too focused on the negatives and completing their questionnaires, did not look at what participants had prepared, made assumptions, and did not capture participants' situation, goals or needs accurately. One respondent described the current planning approach as: "this is what I think you should have, instead of what do you want and how can we accommodate that." Another said that their LAC was not helpful or experienced in the disability sector and made assumptions about his funding needs. He explained that his partner "had to insist that certain things were included and noted down in my plan because the LAC brushed them off and wasn't going to include them!"

This is inconsistent with the NDIS Act, which sets out guiding principles for people who may do acts or things on behalf of a person living with disability. This includes LACs and NDIA Planners. One of these principles states clearly that 'people with disability should be involved in decision making processes that affect them, and where possible make decisions

for themselves.'² The Act goes even further by recognising that participants have the right to determine their best interests, including the right to exercise choice and control and to engage as equal partners in decisions that will affect their lives, to the full extent of their capacity.³ The Commonwealth Government has an obligation, pursuant to the Convention on the Rights of Persons with Disabilities, to protect and promote these rights through its policies and programmes.⁴ JFA Purple Orange urges the NDIA to involve people living with disability in the planning process, perhaps through a review process of draft plans before they are lodged with the NDIA for approval. This would align with the Convention on the Rights of Persons with Disabilities, which states that 'persons with disabilities should have the opportunity to be actively involved in decision-making processes about policies and programmes, including those directly concerning them'.⁵

Recommendation 15

That a draft plan is shared with the participant prior to being finalised, and that this is available for them to take away to review. This also provides a chance to raise anything forgotten about during the planning meeting. Further, this would provide the participant with opportunity to send through amendments or request a second meeting to be held within a set amount of days (perhaps 7 days is reasonable).

We recognise that continuing training and professional development for LACs/planners is important. In the same way that relevant organisations offer continuing professional development opportunities to GPs, the NDIA could resolve and commission a framework for a program of professional development opportunities for planners. This would of course include updates on the NDIS's rules, parameters and pathway mechanisms, but could also include emerging planning methodologies (both generally and for particular demographic cohorts), technological supports, etc. Most importantly, it could include content on the

² NDIS Act s5(a).

³ NDIS Act (Cth) 2013 s4(8).

⁴ Convention on the Rights of Persons with Disabilities, Art 4(c).

⁵ Convention on the Rights of Persons with Disabilities, Preamble para (o).

types of plan elements known to be most effective in delivering strong outcomes in social and economic participation.

The NDIA could establish an expectation that planners access a given number of continuing professional development hours each year, to remain eligible to offer a planning service to NDIS participants.

Recommendation 16

That the NDIS arrangements include an auditable mandatory mechanism for continuing professional development of planners, where a given volume of development time is undertaken by each planner in order to maintain their eligibility to provide a planning service.

4.4. Using and reviewing plans

4.4.1. Current challenges

Participants have described experiencing lengthy wait times for activation of an initial plan, yet the official start date of the plan is recorded as the day of approval. This can often be up to 2 months before activation occurs, resulting in participants having a decreased time to utilise their plan.

Recommendation 17

the plan start date should commence from when the plan is activated and not from planning meeting date to ensure that participants have the full 12 months to utilise their funding.

Participants are also highly frustrated about how difficult it is to contact the NDIA and LACs/planners following implementation of their plan. Several people have described not having their phone calls answered and/or not receiving the information they need. This has prompted some to go to their NDIA/LAC office in person to insist that they meet with someone face-to-face. This has also contributed to self-managed participants 'not using their funds' simply because they are unsure of how to proceed without support.

We are also aware of participants describing lengthy wait times, in some cases close to a year, to hear back about decisions through review processes. We are aware that the Commonwealth Ombudsman has undertaken a review of the NDIS Administration of Reviews under the NDIS Act 2013⁶. This report has stated "without significant efforts to improve the timeliness of NDIA's administration of reviews and communication with participants, there remains a risk that participants' right to review will be undermined and review processes will continue to lack fairness and transparency and continue to drive a high volume of complaints."

Recommendation 18

That there is opportunity for regular contact between LAC/planner and participant over the life of the plan to check in on progress in utilising supports and achieving goals; we suggest this frequency is agreed between participant and LAC during the initial meeting and recorded on a participant's plan.

One of the main issues raised by participants is the fact that they are not kept sufficiently informed following the planning process. Examples include:

- Not having any contact from the NDIA or a planner/LAC for several months after the initial planning meeting;
- Being placed on an interim plan without being notified of this;
- Not being reminded about an upcoming review meeting, or being reminded with very little time (for example, the day before) making it difficult to organise an advocate or other support person to be present;
- Attending a scheduled review meeting to find the LAC is not there (in one case, it took four weeks to reschedule, during which time the person's plan expired);

21

⁶ Administration of reviews under the National Disability Insurance Scheme Act 2013 Report on the National Disability Insurance Agency's handling of reviews, May, 2018. Commonwealth Ombudsman.

- Attending a scheduled review meeting to be told the LAC is away, then being
 allocated a new LAC who has never run a planning meeting before, does not know
 what to do and is not accompanied by a colleague/supervisor; and
- Insufficient information about the different components and budget lines of a plan and how to utilise the plan.

That the NDIA require all LACs/ planners to contact participants four to six weeks prior to any scheduled meetings with a status/progress update or summary, to ensure they are informed and prepared.

4.5. Appealing a decision by the NDIA

4.5.1. Current challenges

Our consultations with NDIS participants and their families allowed us to hear anecdotal reports of people's experiences with appealing decisions made by the NDIA.

In particular, participants reported that appealing decisions is a "lengthy process" and there is a lack of continuity of "case management" or a single point of contact throughout the process.

Recommendation 20

That a case manager is appointed for every appeal or review and that the participant is informed of who this is and how they can be contacted throughout the process.

One particular concern raised by participants is the fact that most LACs/planners are not aware of the decisions made by the Administrative Appeals Tribunal and do not reflect these in their decision-making. The NDIA should keep all planners informed of the latest decisions and how this impacts their work.

That a system is established whereby the NDIA monitors all decisions of the Administrative Appeals Tribunal and informs all LACs and NDIA Planners of the impact these have on their work.

4.6. Legislative changes

We are generally supportive of the proposed amendments to the legislation detailed in Attachment C of the Discussion paper. However, we have heard from participants that there remains great confusion as to what constitutes "reasonable and necessary supports". This is particularly significant for participants who are self-managing their plans and making decision on which funded supports they purchase.

Recommendation 22

That a clearer definition of "reasonable and necessary supports" is provided, including a series of examples.

4.7. Plan amendments

We acknowledge the suggestion within the discussion paper to incorporate 'plan amendments' into the NDIS Act, noting that "a 'plan amendment' would occur when the participant's goals and outcomes do not need to be changed, but minor changes need to be made to ensure it remains fit for service. This would speed up the NDIA's processes and make the plan more of a living, useful document."

We welcome this suggestion as we have heard from participants that currently making minor adjustments is a lengthy process and that currently an entirely new plan needs to be created in order to address any amendments necessary. This reinforces our earlier recommendation of the need for a process to be established whereby participants are given the opportunity to view a draft version of each plan and have some time to review it and request changes before it is finalised.

5. Conclusion

JFA Purple Orange strongly supports this inquiry into the NDIS Participant Service Guarantee and thanks the Department of Social Services for providing the opportunity to share our views.

We strongly believe that it is in the best interests of both participants and the NDIA for the Agency to invest heavily in establishing and implementing participant service standards. This is particularly the case for the areas of service standards that relate to pre-planning and planning processes. The strength of the relationship between the participant, the NDIA and the LAC/planner is critical to the way in which a participant can use their plan to achieve their goals and increase their meaningful participation in the community. This is likely to not only reduce their future funding needs, but also to have a substantial impact on their quality of life.

Should the Committee wish to discuss our proposal in more detail, please contact Mr Robbi Williams, CEO of JFA Purple Orange on + 61 (8) 8373 8333 or admin@purpleorange.org.au.

6. Appendices

6.1. Attachment A: Potential ideas for Participant Service Guarantee Service Standards (for discussion)

Principle	Description	Service Standard
Timely	The NDIS process will be easier to understand and use, enabling decisions about access, planning and review to happen promptly.	The NDIA makes decisions in a timely and responsive manner:
		 Once the NDIA has appropriate information, Access requests are made in XX days.
		 Participants are offered a planning meeting within XX days of receiving their access met decision.
		 First plan approvals take less than XX days after their access decision.
		 Plans are approved within XX days of their final planning meeting, following the provision of all necessary evidence.
		 Plan amendments are considered within XX days of the request.
		 Plans involving SDA or AT requests are made within XX days of the information being provided.
		 Participants who request an internal reviews of decision are contacted within XX days of the request.
Engaged	The NDIA engages with people with disability, their family, carers and other support persons when developing operating procedures and processes.	The NDIA works with people with disability to ensure their processes and operating are designed to be understood by people with different abilities and needs.
Expert	NDIA staff have a high level of disability training and understands the impact particular disabilities have on people's lives. They understand what supports are most effective for a person's disability.	NDIA staff has a high level of disability training and understands the impact particular conditions have on people's lives. They understand what supports are most effective for a person's disability.
Connected	The NDIA works well with governments, mainstream services (such as health, education, justice services),	The NDIA works constructively and collaboratively with the broader service system to ensure that there are no gaps for NDIS users where possible.

Principle	Description	Service Standard
	disability representative groups and providers to ensure people with disability have coordinated and integrated services.	
Valued	Participants, their families, carers and other support persons feel valued in their interaction with the NDIS, and know where to go if they need further assistance.	The NDIA ensures that the broad community understands the purpose of the NDIS and where they can go if they need further assistance.
Decisions are made on merit	The NDIA acts in a transparent, informative and collaborative spirit so that participants understand why decisions are made.	The NDIA acts in a transparent, informative and collaborative spirit.
Accessible	All people with disability can understand and use the NDIS, and the NDIS ensures its services are appropriate and sensitive for. Aboriginal and Torres Strait Islander people, people from Culturally and Linguistically Diverse (CALD) backgrounds, LGBTQIA+ and other individuals.	The NDIA provides information to meet the needs of specialised groups, including CALD, LGBTQIA+ and Aboriginal and Torres Strait Islander people, to enable them to access the NDIS like any other citizen.