



**Submission to the Parliamentary Joint Committee on the
National Disability Insurance Scheme, March 2016**

About Mind the Gap: Disability Matters

Mind the Gap: Disability Matters is a small, independent provider of plan management and support coordination. We are registered with the National Disability Insurance Agency (NDIA) and currently provide support to 40 people in the Hunter region.

Our objective is to assist people with disability and their family to “self direct” their support.

Self direction is truly personalised approach to planning, designing support and implementation.

Self direction means that support is tailored to the person with a disability. The person (maybe with assistance from family) decides who provides support, when they get support, where and how.

With self direction each person has the freedom and flexibility to live their life the way they choose and to participate in the community as an active and valued citizen.

We assist NDIS participants with self management and/or plan management of their NDIS plans. We also assist NDIS participants with coordination of their supports, finding the best match in supports and making connections with the mainstream community.

We do not provide direct support so we operate with minimal conflict of interest.

The Productivity Commission report (2011), in its early architecture of the NDIS, recommended the establishment of a new type of organisation they called Disability Support Organisations (DSO). They envisaged that DSOs:

“would offer people brokering services, the skills and confidence to practically exercise choice, management services (such as dealing with the administrative aspects of self- directed funding, were a person to go down that route), personal

planning, and orientation supports for people who are suddenly faced with the unfamiliar world of severe disability" (Productivity Commission 2011 p. 40).

"However, the Commission draws particular attention to the distinction between disability support organisations (DSOs) and specialist service providers. The former are intended to provide support to people in using services — brokering, managing administration, mentoring and planning — and the term 'support' provides a useful way of distinguishing their role from that of traditional service providers. (Productivity Commission 2011" p.101)

(For a comprehensive detail about DSOs read Productivity Commission 2011 p. 414-422)

By and large at Mind the Gap: Disability Matters we have modelled our services on this DSO framework described by the Productivity Commission (2011).

Mind the Gap's values and practice are informed by our lived experience of disability and our personal and professional know-how self directing support.

What is working well?

People generally come to Mind the Gap: Disability Matters because they want more flexibility, choice and control over their support. We work with NDIS participants with a wide range of disability and support needs; from very small NDIS packages to very large and complex.

We have been working with participants and their families to find the best match in support and also to develop community connections, volunteer and work opportunities. For example: one young woman is well on the way to achieving her goal to have a good job. She has left her day programme, started a TAFE course and is undertaking work experience where she is doing well.

We assist people to understand and keep track of their budget, offer training and provide budget information in accessible formats. We also assist people to build their skills, knowledge and confidence to exercise choice and control over their support.

How this works: the participant or their representative/family member receives invoices from service providers for the services they have received and they verify invoice before payment. If they are self managing their support, they pay the invoice and claim back from the NDIA (though for some people Mind the Gap provide the assistance they need to do this). If Mind the Gap is plan managing their support, we pay the invoice and claim back from the agency.

On a monthly basis (though can be more frequent if the participant chooses) Mind the Gap provides information to the participant and/or their family on their NDIS funding budget. Information is made accessible to people who do not have financial literacy and/or people who require alternative formats, and we can meet face to face, if needed, to provide this info.

With this information participants and/or their families can make informed decisions about how they use their funding. Importantly though, participants or their family are checking and verifying the payment for services.

Our experience thus far is that Participants and their families greatly appreciate the independence and values driven approach to self direction of support. We are able to genuinely partner with participants and seek creative and personally tailored solutions to their support needs and assist them to find their place contributing to the community.

The issues

- Most participants and their families are unaware of the option of self management or plan management of their NDIS funding. We have information from many people that they were never offered or informed of these options at their NDIS planning session. We believe participants should be informed of the various ways they can self direct their support

- NDIS plans are largely inaccessible. Plans are complex and often indecipherable to the average person. With the new plans (post August 2015) the aim is that plans are flexible within each category. However when just given an annual budget this requires quite a degree of number crunching to understand what support is available.

We believe an NDIA priority should be to make plans and the participant portal accessible to people with a range of abilities. This would ensure that people with disability and their families are able to understand their support budget and are in a strong position to make choices about how they are supported and getting the best value for money.

- Agency managed is the default option for the vast majority of NDIS participants. At Mind the Gap we have seen many service agreements between service providers and participants. Standard in these agreements is a clause of annual or one-off approval for payment of services delivered. This means that service providers can

claim the cost of service through the provider portal without providing an invoice or information to the participant or their family about what they are claiming from the participants' NDIS funding.

With self managed and plan managed funding, service providers must provide an invoice for their services in order to be paid.

At Mind the Gap we see the errors in the invoices! The frequency and scale of errors is concerning as these errors are only detected because the participant is either self managing or having their plan managed by Mind the Gap.

We believe plan management and self management provides an important accountability and transparency component to the NDIS in that delivery of services is verified prior to payment.

- Almost all large service providers are registered for plan management. From our experience we do not believe the issue of conflict of interest is appropriately addressed. Mind the Gap: Disability Matters actively supports and encourages the emergence and development of other independent organisations offering plan management and coordination of support and agrees with the Productivity Commission's assessment that these services should be separate from the provision of direct support (Productivity Commission 2011 p. 419).
- The provider portal does not provide exclusive access to the plan manager when the participant has chosen plan management. This indicates the actual processes of plan management and financial intermediary have not been developed appropriately. The effect is that any service provider who is registered for plan management (and many are) can go into the portal and claim payment for services rather than going through the plan management agent. As plan managers we can see funds missing from the participants plan but no record of funds claimed. To solve this mystery we must ask the participants to go into the portal and look up who took the funds. We can then chase up with the service on behalf of the participant. You can imagine the amount of time it takes to sort this out!
- The espoused aim of the NDIS for greater independence, social and economic participation is not being realized. We are finding many, many participants are wanting, and are articulating in their goals, a desire to build their skills and to be involved and contribute to the mainstream community. However their NDIS plan is funded for group based and segregated activities. Throughout the disability sector

there remains a pervasive belief that people with disability should live their lives largely separate from people without disability. Funding for group based activities is at half or a third of the rate of individual support. However it is with individual support that participants are able to build their skills, develop independence, foster relationships and informal supports and be included in the mainstream community. This inclusion work is by necessity person centered and individual. While the up front cost of individual support (ie one to one) may be greater we strongly contend that the investment is worth it.

We appreciate the opportunity to discuss the NDIS and raise these issues with the Joint Standing Committee on NDIS. Please let me know if you have any questions or I can be of assistance any way.

Yours sincerely

Linda Hughes

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Mind the Gap: Disability Matters

References

Productivity Commission Report into Disability Care and Support, 2011
<http://www.pc.gov.au/inquiries/completed/disability-support/report>