

**BAPTISTCARE’S RESPONSE – May 2015**

**PARLIAMENTARY JOINT STANDING COMMITTEE ON  
THE NATIONAL DISABILITY INSURANCE SCHEME**

Baptistcare is a faith based community benefit organisation that works to provide care and support services across the aged care, disability and mental health sectors.

Our quality care is provided by over 1700 skilled and professional employees and more than 250 volunteers who are all dedicated to transforming and enriching the lives of the people we care for. We operate in regional, rural and metropolitan Perth.

Baptistcare's vision is for people who come into contact with us, to begin to see changes in their lives. We long to see people's lives enriched and made more satisfying, but even more than that, we see the potential for transformation from hopelessness to hope, from fear to confidence, from loneliness to community and from sadness to joy. Providing a personalised approach is at the core of how we operate. We know everyone is different, which is why it’s important for us to get to know you.

Our Vision applies as much to our staff, volunteers and supporters, as it does to those we serve, so our goal is to work together to achieve this goal.

Baptistcare believes that Self-Direction is a right that should be honoured for all individuals who access our services, a right which requires us as an organisation to include family and loved ones, in order to ensure that everyone is heard and makes choices that give them a good life, especially the voiceless.

It is with this commitment and belief in mind that we welcome the NDIS as a vehicle for empowering individuals to make choices that support a future of good life.

In making this response to the Joint Parliamentary Committee, we will share Baptistcare’s commendations as well as highlight areas that require further work in order for the NDIS My Way Trial to be successful.

This are noted below:

1. **Baptistcare’s commendations**

Baptistcare commends the Disability Services Commission for its commitment to providing localised responses to Disability Support in WA. Our experiences within the NDIS My Way Trial sites have confirmed that the Trial model offers flexibility to individuals in how their supports are designed to meet their service outcomes. Individuals who have a strong appetite for taking full control of their services, and who have been sharing the management of their supports with Baptistcare prior to the change into the NDIS My Way option have fully embraced the change, and are able to exercise the level of control that is necessary towards self-direction.

Another aspect that Baptistcare has experienced as working well is the ease of contact with the Disability Services Commission to raise issues, concerns and commendations.

WA’s Disability Services and Mental Health Services have separate Panel Contracts for Service Providers to engage to provide services to individuals with disabilities and individuals experiencing a mental illness. The fact that the Disability Services Commission has been able to extend the opportunity for organisations who have a Mental Health Panel Contract to also provide services within the NDIS My Way Trial sites has meant that increased opportunities are presented for individuals with mental Illness within the Trial Sites to access increased choice of services.

The release of the My Way Portal is a progressive step that is welcomed by Baptistcare as it is hoped that this will assist in minimising the administrative aspects of the Trial.

Lastly, Baptistcare has observed a shift in the Commissions planning approach which is now creating opportunities for Individuals and Disability Sector Organisations to connect prior to plans being finalised. This change in approach is relatively new and highly welcomed by Baptistcare.

1. **What areas need further work within the context of the NDIS My Way Trials**

At a strategic level, we are seeing what appears to be a competition between the National Scheme and the State Scheme, at the opportunity cost of individuals and families. This has been evidenced through a number of state changes that have occurred since the launch of the Perth Hills NDIS Trial Site. These changes have included renegotiations to service support strategies and pricing structures that the State Disability Services Commission had previously approved and contracted Disability Sector Organisations for, to re-align with the NDIS hills parameters as closely as possible. It is Baptistcare’s view that in making some of these significant changes, the NDIS My Way Trial has effectively shifted its focus more towards administrative practices that are not streamlined and rigorous reporting that is becoming bureaucratic which is changing its value proposition.

Baptistcare recognises that the NDIS My Way service is still in its early stages, and will therefore refine and adapt as its systems and processes mature. However we wish for the following systemic concerns to be noted as key improvement opportunities.

**Administration Communication and reporting**

* To date, a large number of individuals with disabilities are accessing direct support services through Disability Service Organisations (DSO). The Disability Services Commission is entering into a new way of service delivery that will see it engaging more directly with individuals with disabilities in a way that it has not historically done, more specific to planning for direct supports for individuals. In doing so, the opportunity is presented for the Commission to increase communication with individuals as well as Disability Service Providers who have been engaging with individuals to date.

Our experience is that key information about specific processes are scarce and rather reactive. This extends to communication within the Commission itself, between its Local Area Coordination Team, the My Way Coordination Team and Service Contracting. For example, where changes occur to the documentation and processes used for My Way funding procurement processes at a local level, Baptistcare is provided with the revised documents without clarity of instruction, which are then used by Baptistcare and sent to the Commission for approval. Due to the lack of clarity of how the documents are to be used, this often generates varying degrees of expectation from the Commission staff, which leads to extended hold ups of the process. The difference of understanding of My Way processes within the Commission’s contracting staff and My Way team lead to the Service Contracting team within the Commission rejecting the revised processes and communicating this back to Baptistcare with unhelpful messages that clearly indicate a lack of faith within the Commission’s service contracting team about the NDIS My Way Trial.

These messages of disconnection mean that Baptistcare then has to re-engage with the My Way Coordinators to seek clarity. On several occasions, by the time Baptistcare has gone back to the My Way local team for clarification, the forms and processes have again changed. There has also been situations where individual My Way Coordinators have made changes to the processes themselves and this has highlighted some discrepancies between the different My Way Coordinators approaches.

Baptistcare’s concern extends to the impact these inconsistencies are having on individuals as they report uncertainty about the My Way Trials and their confusion of the trial’s intended purpose.

The My Way Portal is a relatively new portal aimed at streamlining the engagement process as well as supporting the administrative aspects of the model. Baptistcare was recently required to complete reporting within the My Way Portal which highlighted an onerous process. Each Individual within My Way has a number of support strategies averaging about 4 to 6 strategies. Each strategy has an allocation of service units of hours of support. The reporting process required Baptistcare to enter actual hours of support provided against each of the strategies for each individual and to back date this reporting for the previous 3 quarters. Naturally this was an administrative challenge as Baptistcare had not received communication from the Commission to capture the required data for reporting. The amount of administrative errors that are occurring through the NDIS My Way processes are now impacting on Baptistcare’s resources as we are having to highlight errors in documentation, which go back to be addressed, and come back with further errors. Given the increasing changes to the My Way Trial processes, there is an opportunity for the Commission to engage more with the sector and to share its thinking around changes to systems, which will allow Disability Sector Organisations to put in place internal processes in readiness for such changes to allow ease of compliance, as most data cannot be retrospectively changed without losing its integrity

* Baptistcare has had to navigate various channels of communication in relation to seeking and getting responses from the Commission about My Way Contract Variations to Service Agreement. Baptistcare has continued to liaise with its key Service Contracting and Development Officer in the Commission in relation to the State Panel Contracts however, it remains uncertain as to what the centralised point for clarification of contract matters related to My Way is, as there continues to be inconsistencies in responses that often contradict. While matters related to non My Way contract matters are easily navigated, it will be helpful if the Commission could establish a centralised query point.

**Planning and Plan Quality**

* Baptistcare has observed that over a period of months, there has been a decline in the quality of plans that are being generated through My Way Coordinators for individuals. These plans have shifted from reflecting a richness of individual’s strengths and a focus of strategies that will support them to achieve meaningful outcomes to becoming a list of activities. The plans effectively highlight a process that is driven towards increasing numbers of individuals into the service Trials rather than a focus on supporting meaningful and valued outcomes for individuals. This change raises a number of concerns for Baptistcare as our support of a localised Scheme has been based on extending the belief that the journey that WA’s Disability Services has taken to date has emphasised a strong focus on self direction and positive outcomes for individuals.
* Our emerging concern is that if the planning process is becoming a speed process that is about getting individuals across the line, with a menu of choices then the sustainability of quality supports for individuals and ultimately of the WA Trial requires more work.
* As individuals have been going through the planning process, some individual’s resource allocations have been significantly reduced. Baptistcare has not had clarity about the reasons underpinning the reduction of resources for the individuals other than the reason being that the reduction aligns with the NDIS legislation of reasonable and necessary supports.
* There were several occasions where plans released by My Way Coordinators for quotes/ costing were formalised into service contracts without further communication with Baptistcare that the quote had been considered or even accepted. In such circumstances, the individuals were informed by the My Way Coordinator that their services will commence through Baptistcare without Baptistcare’s knowledge.
* The process of planning for individuals is reflecting a process whereby the gap between Disability Service Organisations and individuals is widening, while individuals are expected to make informed decisions about which organisations they wish to access their services. This change is evidenced by increasing contacts between My Way Coordinators who plan for individuals and Disability Sector Organisations. The My Way Coordinators send completed plans to Baptistcare for quoting and the plans are then signed off by the Commission as the basis for service delivery, with limited opportunities being presented for Baptistcare to meet with the individuals. Feedback that Baptistcare is receiving about the reasons for such a gap are that the My Way Coordinators have to meet their Key Performance Indicators determined through the volume of plans that they sign off on and their associated timelines.
* Baptistcare’s concern is that such a process neither empowers individuals to make informed decisions about their supports nor does it value the benefit of them knowing about the organisations they choose for services. It reinforces the fact that disability support can be an administrative decision based on a low cost determinant factor rather than based on choice and value.
* It is worth noting though that over the last few weeks (April / May 2015) there has been a shift to this style of planning, as Baptistcare has now had a couple of situations where opportunities were presented for Individuals to engage with Baptistcare prior to finalising their plans.
* Baptistcare understands and expects that all individuals will be empowered to engage with organisations during the planning process or once their plans are finalised by My Way Coordinators, and for the organisations to discuss their service offerings with the Individuals who will then make informed choices about which organisation they wish to access services from. It appears that the process in place with the My Way service is one that almost resembles a gate keeping approach of playing with budgets rather than an empowering and enabling approach towards Individuals with disabilities.

**Pricing**

* In relation to pricing, the WA My Way Trials sit within the WA State’s Delivering Community Services with Government Policy, which see the WA Government as a Price Taker rather than a Price Setter. This means that in WA Disability Service Organisations are approved by the State Party to set their prices based on their service offerings and the capacity of such offerings to provide quality outcomes for individuals. Given the two Trials occurring in WA, The State Government has renegotiated pricing with Disability Service Organisations to operate within a pricing bandwidth that allows close parity with the National Trial’s approach to being a Price Setter. This situation poses a challenge to the My Way Trial for the reason that as individuals complete a planning process, and their reasonable and necessary supports are determined, and if for example an individual was considering two different Disability Service Organisations, then the two Disability Service Providers that they shortlist to choose from may have different pricing structures based on their approved Panel Contract pricing. In such situation, the choice the individual makes about which Disability Service Organisation should not impact on the individuals approved strategies and the units associated with such strategies (For example, if the individual wanted to purchase 2 hours of personal support - whether the individual chooses Provider A whose hourly rate of purchase is $45.00 an hour or Provider B, whose hourly rate of purchase is $50.00 an hour), however, this may have an overall economic impact. While it remains unclear how such situations are being managed, Baptistcare is confident that with more exposure to individuals making informed choices, such matters will involve clearer established processes.
* Another systemic concern involved My Way Coordinators expressing their dissatisfaction about organisation’s service pricing and wanting to renegotiate the pricing individually with the organisation, this is despite the pricing being approved through a panel contract with the Disability Services Commission as the same organisation that employed My Way Coordinators. Baptistcare’s experience of this has led to formalised communication with the Commission to seek clarity about this systemic issue, which to date remains unresolved. Of particular concern is the fact that employees of the same Commission that has approved the pricing for organisations are dissatisfied with the approved pricing. This matter coupled with the matter of My Way planners being mainly the interface between organisations and Individuals, has the potential to silence organisations and individuals, while reflecting heightened control of the Commission.

**Impartiality and empowering Individuals**

* The challenges experienced around the engagement of My Way Coordinators include some Coordinators misunderstanding of their role, as some coordinators take a biased view of organisations based on things like organisation’s pricing structures. This has included first hand feedback from My Way Coordinators about their personal position to not recommend an organisation based on pricing. Naturally Baptistcare’s concern is about the impartiality that may be compromised through such an approach, and the effect of disempowerment that this may generate within a scheme that is intended to empower people with disabilities to make choices.

As previously stated, Baptistcare is seeing an increase in My Way Coordinators enabling links for Baptistcare to engage with Individuals prior to finalising plans. This is a newly emerging approach that has only been occurring within a matter of weeks. Baptistcare is heartened by this change in process.

**Inclusion of Mental Health**

* As an organisation that supports individuals with mental illness in regional areas in WA, we would like to see greater involvement of mental health within the My Way model. Our experience is that as the My Way Trial has emerged out of the Disability Services Commission’s construct, it has not yet fully embraced mental health inclusion, although we wish to acknowledge the collaborative work being undertaken by the joint Mental Health and Disability Services Commissions to effect this change. Baptistcare

**Conclusion**

Baptistcare acknowledges that the implementation of dual NDIS Trials within WA which includes a State Trial and a National Trial have added a level of complexity into the mix of Disability Support, especially as WA is a State undergoing significant community service reforms which stem partially from the State’s response to the Delivering Community Services in Partnership Policy.

At the receiving end of these trials are individuals with disabilities who are experiencing confusion, excitement, relief, uncertainty and to a certain extent some fear. Baptistcare’s view is that whatever we do as a nation in the name of improving services, we must mirror service quality and hold individuals safe through it. In other words the roll out strategy itself must be a service to individuals.

On reflection of the current approaches to implementing the NDIS & NDIS My Way suggests that as a nation, the level of complexity that has been created can be effectively managed as long as the people that are most affected by it and the relevant key stakeholders are collaborative in its design and roll out.

It is with that in mind that Baptistcare thanks the Senate for this opportunity to reflect on what is working and what needs further work.