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The Hon Kevin Andrews MP
Chair
Parliamenatry Joint Standing Committee on the
National Disability Insurance Scheme
PO Box 6021
Parliament House
CANBERRA ACT 2600

Dear Chair

Please find attached a submission from the National Disability Insurance Agency to the Joint Standing Committee on the National Disability Insurance Scheme inquiry into the provision of hearing services under the National Disability Insurance Scheme.

Yours sincerely

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National Disability Insurance Agency

25 January 2017

Joint Standing Committee on the National Disability Insurance Scheme

Inquiry into the the Provision of Hearing Services under the National Disability Insurance Scheme

Introduction

The National Disability Insurance Scheme (NDIS) is the new way of providing support for Australians with disability, their families and carers. The NDIS will provide about 460,000 Australians under the age of 65 who have a permanent disability with the reasonable and necessary supports they need to live an ordinary life. The NDIS will help people with disability achieve their goals. This may include greater independence, community participation, employment and improved wellbeing. As an insurance scheme, the NDIS takes a lifetime approach, investing in people with disability early to improve their outcomes later in life.

The National Disability Insurance Agency (NDIA) applies a listen, learn, build and deliver approach in supporting the growth of the NDIS and transition from trial to full scheme.

The NDIA is undertaking a range of activities to ensure support under the NDIS for people with hearing impairment is appropriate, evidence based and consistent with the *National Disability Insurance Scheme Act 2013* (the NDIS Act) and the modelling from the Productivity Commission. These activities include, but are not limited to:

- developing guidance material for use by NDIA National Access Team, planners and Local Area Coordination (LAC) partners on levels of hearing loss likely to require NDIS supports;
- developing reference packages to guide planners and LAC partners in building participant plans, including guidance on reasonable and necessary funded supports;
- Supporting arrangements for transition of people from former Commonwealth Programs
- designing referral pathways with a particular focus on early childhood/early intervention (ECEI) to ensure appropriate supports are received as early and efficiently as possible;
- working with service providers to assist their transition to the NDIS environment; and
- working with key stakeholders and deafness/hearing loss communities to build their understanding and engagement in NDIS processes.

In addition to the above activities the NDIA undertakes a number of discrete pieces of work as required, for example research.

NDIS participants with hearing impairment

Consistent with the NDIA's Market Stewardship approach, outlined as part of the NDIS Statement of Opportunity and Intent released in November 2016, the NDIA seeks to create an efficient and sustainable marketplace that supports the transition to the NDIS.

Based on actuarial modelling, the NDIA expects approximately 16,000 - 20,000 participants with hearing impairment to enter the NDIS. This is not counting those who might have hearing impairment in addition to their primary disability (e.g. someone with intellectual disability might also have a hearing impairment).

As of 30 June 2016 there are approximately 700 NDIS participants with hearing impairment[1]. This represents approximately two per cent of current NDIS participants. Of these 700 NDIS participants approximately 200 are between zero and six years of age.

[1] The number of NDIS participants with hearing impairment are a combination of Hearing Services Program clients, new NDIS participants, as well as participants that may not have required funded hearing supports in their NDIS plans to date.

As of 30 June 2016 the average annual cost of NDIS plans for people whose primary disability is deafness/hearing impairment at this stage is approximately $15,000.

Transition Arrangements

As part of the introduction of the NDIS in 2013, the Australian Government agreed that direct funding for some existing Commonwealth programs that provide support to people with disability would transfer to the NDIS.

Transitioning programs include funding for services typically provided through the Remote Hearing and Vision Services for Children, the Better Start for Children with Disability program and the National Auslan Interpreter Booking and Payment Service. NDIS participants will be able to access funding to similar services to these programs under the NDIS when it is available in their area.

One of these programs is the Hearing Services Program (HSP), administered by the Department of Health. This program is split into two components:

1. Voucher component – delivered through contracted hearing service providers.
2. Community Services Obligations (CSO) component – delivered through a single contracted provider Australian Hearing. Australian Hearing is a statutory authority constituted under the *Australian Hearing Services Act 1991*, reporting to the Minister for Human Services, and is within the Human Services portfolio.

HSP clients will transition to the NDIS where they;

- are aged under 65 years of age;
- meet residency requirements; and
- meet early intervention or NDIS disability access requirements.

Young Australians aged 0-26 currently receiving CSO services from Australian Hearing are expected to transition to the NDIS and continue to receive their services from Australian Hearing as an in-kind contribution to the Scheme costs.

The NDIA is developing evidence based guidelines to support consistency in decisions about accessing the NDIS and reasonable and necessary supports for people with hearing impairment.

Understanding the functional impact of hearing impairment

In understanding the functional impact of hearing impairment the NDIA has engaged with a number of key stakeholders in the field, including:

- Office of Hearing Services (OHS), administered by the Department of Health
- Department of Social Services
- Department of Veteran's Affairs
- Australian Hearing
- Academics
- Peak bodies
- Service providers

A number of these stakeholders are members of the NDIS Early Intervention Expert Hearing Reference Group.

NDIS Early Intervention Expert Hearing Reference Group (EIHERG)

The comment and advise on a range of issues including implementation of NDIS access criteria, the referral pathway from newborn hearing screening programs and other diagnostic services, and clinical standards, governance, and expertise required to deliver specialist hearing services for infants and young children.

Members of the EIHERG include parent representatives, academics, peak bodies, service providers and organisations, as well as NDIA staff. Practical and empirical evidence provided by the EIHERG will inform NDIS implementation of access for early intervention; and the range of 'reasonable and necessary' supports based on degree of impairment.

In addition to working in collaboration with the EIHERG, advice has been sought from experts in adult hearing impairment, including; industry stakeholders, the OHS administered by the Department of Health, Australian Hearing and the Department of Veteran's Affairs.

The EIHERG are providing comment on the impact and application of possible approaches to key elements of work including:

- appropriate age and hearing threshold guidelines for early intervention;
- inter-agency referral mechanisms that enable streamlined service access at each point of the service pathway;
- the functional impact of different types and degrees of hearing impairment; and the type and quantity of reasonable and necessary early intervention supports for the different types and degrees of hearing impairment and any other important characteristics;
- co-existing conditions which are likely to affect the intensity or types of early intervention supports required, as well as quantify the additional supports known to address the additional needs associated with these conditions.

At the EIHERG meeting of 29 November 2016 members discussed key elements of the approach to NDIS access for children up to six years of age. In early 2017 there will be a full day workshop which will focus on reasonable and necessary funded supports for children aged zero to six years.

<u>NDIS priorities for 2017</u>

1. Implementation of NDIS access criteria, including recommendations on the pathways and referral structures and process in the NDIS.

This area of work is focused on ensuring pathways and referral structures support the implementation of NDIS hearing impairment access criteria under Section 24 and Section 25 of the NDIS Act.

Issues under consideration include:

- Maintaining a high quality, evidence based, and nationally consistent approach to providing early childhood intervention and early intervention for hearing impairment through the NDIS consistent with the intent of the NDIS Act.
- Delivering effective early intervention supports for young Australians aged 6-26 e.g. hearing aids, cochlear implant speech processors and communication therapy recognising the potential long term outcomes such an approach achieves.
- Understanding financial sustainability and lifelong costs under the NDIS. The Council of Australian Governments Applied Principles and tables of support on health and education need to be considered to understand the pathways, referral structures and services available to people with hearing impairment. The health system remains responsible for detection, assessment and medical and surgical procedures and associated care. The education system is responsible for reasonable adjustment to both the environment and specialist education support for the students.

2. Finalising the transition elements including ECEI reference package for zero to six year olds

Reference packages aim to provide an annual benchmark funding guide for the level of support for participants with similar support needs and characteristics. Informed by evidence provided by the research literature and EIHERG, NDIA staff have drafted a suite of typical support packages for children with hearing impairment relative to age and severity of impairment. This analysis will be further tested with stakeholders over the coming months.

3. Commence the development of evidence based reference packages across the life span.

This will continue the methodology applied to early childhood in updating reference packages for adults. This includes development of resources and will see staff trained and competent in interpreting the needs of children and others with hearing impairment and considering their needs against the benchmark data.

Response to Terms of Reference

a) The eligibility criteria for determining access to, and service needs of, deaf and hearing impaired people under the NDIS;

The NDIA recognises the importance of providing clear guidance for deaf and hearing impaired people on the interaction between the NDIS Act and access to the Scheme.

The NDIA in consultation and engagement with a number of key stakeholders, including the EIHERG, is developing a proposed approach for implementing the NDIS access criteria for deaf and hearing impaired people.

The NDIA expects to release information on the proposed approach, including guidance material for access decision making, for implementing the NDIS access criteria for deaf and hearing impaired, early in 2017.

b) Delays in receiving services, with particular emphasis on early intervention services;

A person may be eligible for access to the NDIS if they meet the early intervention criteria under Section 25 of the NDIS Act. In brief, the person must;

- have one or more identified impairments where these impairments are likely to be permanent or;
- be a child under six with developmental delay.

In applying Section 25, the NDIA also considers how the person is likely to benefit from early intervention.

Individual bilateral agreements, between the NDIA and individual jurisdictions, determine how the NDIA transitions existing state and territory clients into the NDIS. These agreements also stipulate when, and how, many new participants can receive plans in the NDIS. For people who sustain sudden or new hearing impairments and who are not existing state clients, the availability of planning will depend on these bilateral agreements. Prioritisation of clients with a new diagnosis looking to access the NDIS will be consistent with phasing arrangements outlined within the bilateral agreement. During trial and for the period of transition, Australian Hearing Services will remain 'In-Kind' and will therefore also likely continue to be available to support those who are yet to enter the Scheme.

c) The adequacy of funding for hearing services under the NDIS;

As of 30 June 2016 the average annual cost of NDIS plans for people whose primary disability is deafness/hearing impairment at this stage is approximately $15,000.

Individual plans with hearing related goals typically include;

- assistive technology (hearing aids and devices);
- evidence based therapies to support development of the auditory and language pathways or to improve communication;
- capacity building supports e.g. individual or group based activities to promote social skills.
- Auslan interpreters or Auslan courses;
- other support e.g. support to sustain informal care or support coordination.

The NDIS may fund hearing services and supports not available under the HSP where the evidence indicates that this would lead to enhanced outcomes for the individual. The NDIS continues to liaise with the OHS on the provision of hearing services and appropriate hearing technology for NDIS participants.

The development and implementation of NDIS access guidance and reference packages for people with hearing impairments are separate but interrelated projects. NDIS access guidance is a high priority as it underpins the work on reference packages, including appropriate reasonable and necessary supports, and are a prerequisite for other programs to progress their transition planning. However, given the complexity of the planning project, and in order to deliver planning guidance early in 2017, work on this has progressed in parallel with the access guidance project.

d) The accessibility of hearing services, including in rural and remote areas;

The NDIA's Rural and Remote Strategy (the Strategy) recognises the challenges for people with disability accessing services in rural and remote communities.

Building access to providers is a key element of the Strategy and a range of activities are underway to increase the access to services including:

- Facilitating access to the NDIS for rural and remote communities through LACs and Regional Hubs.
- Working closely with existing service providers, key community agencies and across sectors to share information and address concerns.
- Working with state, territory and local governments, as well as staff on the ground to gain an understanding of individual remote markets, including gaps and opportunities for market development.
- Engagement with providers to draw on local expertise and community knowledge to assess and build potential capacity to expand their service offerings and encourage new enterprises. This may include work to enable or encourage service providers from other sectors (health, aged care, employment) to increase their engagement with people with disability.

There is a significant market of hearing aid providers nationally, including approximately 300 OHS contracted hearing services providers, consisting of multiple outlets. For example, Australian Hearing's national network of hearing centres includes more than 110 permanently staffed centres, and 330 visiting locations in urban, rural and remote areas of Australia, and Australian Hearing regularly visit 220 Aboriginal and Torres Strait Islander communities in all parts of the country.

e) The principle of choice of hearing service provider;

During transition, most NDIS participants over 26 years of age for whom funded supports include hearing services, can access hearing services through the network of OHS contracted providers.

Australian Hearing will continue to be the sole provider for NDIS participants who access services via the CSO Program (e.g. Australians up to age 26 and adults who meet OHS 'complex' criteria) during transition.

Matters relating to broader contestability of hearing services for full scheme are under consideration.

f) The liaison with key stakeholders in the design of NDIS hearing services, particularly in the development of reference packages;

The NDIA has maintained an ongoing dialogue with a broad range of stakeholders, including:

- Office of Hearing Services, administered by the Department of Health
- Department of Social Services
- Department of Veteran's Affairs
- Australian Hearing
- Academics
- Peak bodies
- Service providers

A number of these stakeholders are members of the NDIS EIHERG.

NDIS Early Intervention Expert Hearing Reference Group

The EIHERG comment on a range of issues including:

- the implementation of the NDIS access criteria;
- potential for delays in referral from newborn hearing screening programs; and
- the clinical standards, governance, and expertise required to deliver specialist hearing services for infants and young children.

Practical and empirical evidence provided by the EIHERG will inform the implementation of the access criteria for early intervention; and the range of 'reasonable and necessary' supports based on degree of impairment.

The NDIA's engagement with members of the EIHERG and other service providers has been in accordance with probity requirements and has mitigated conflicts of interest.

<u>EIHERG Membership:</u>

- Telethon Speech and Hearing
- Hear and Say
- Office of Hearing Services
- Monash Health
- Shepherd Centre
- Taralye
- Aussie Deaf Kids
- Cora Barclay
- Royal Institute for Deaf and Blind Children
- Deafness Forum
- Speech Pathology Australia
- Australian Hearing
- Parents of Deaf Children
- The Deaf Society of NSW

The key NDIS priorities for early 2017 include:

- Implementation of NDIS access criteria, including recommendations on the pathways and referral structures and process in the NDIS.
- Finalising the transition elements including ECEI reference packages for zero to six years old.
- Commence the development of evidence based reference packages across the life span.

The EIHERG will provide advice and insight to support the NDIA complete these priorities.

g) Investment in research and innovation in hearing services

The Australian Government is investing in research and innovation in hearing services.

The Australian Hearing Services Program, administered by the Department of Health, support research and prevention activities that;

- contribute to the development of improved policies and services delivery, and
- enable the Department of Health to better identify the needs of the community in relation to hearing impairment.

Funded research and development activities into hearing health, prevention and rehabilitation is undertaken by the National Acoustic Laboratories and various other research institutions, through the Hearing Loss Prevention Program.

The NDIA acknowledges the work that other areas of Government, including the Department of Health, are doing in research and innovation in hearing services. The NDIA is currently working on an approach to research and innovation that promotes positive outcomes for people with hearing impairments and does not duplicate existing projects undertaken by other areas of Government.