

**Speech Pathology Australia's Submission to the
Joint Standing Committee on the National Disability Insurance Scheme
Inquiry:
NDIS ICT systems**

14 September 2018



Hon Kevin Andrews MP
Chair
Joint Standing Committee on the National Disability Insurance Scheme
PO Box 6100
Parliament House
Canberra
ACT 2600

Dear Mr Andrews

Speech Pathology Australia welcomes the opportunity to provide feedback to the Joint Standing Committee on the National Disability Insurance Scheme's Inquiry into the NDIS ICT systems. As you are aware Speech Pathology Australia is the national peak body for speech pathologists in Australia, representing more than 8500 members. Speech pathologists are university trained allied health professionals with expertise in the assessment and treatment of communication and swallowing disabilities.

As the peak body regulating and representing speech pathologists, we have drawn together feedback from our members working with NDIS Participants from all states and territories of Australia. We preface our comments relating to the Inquiry's Terms of Reference with background information about communication and swallowing disabilities. Our main area of concern include the extensive additional administrative burden upon providers and unpaid time spent in dealing with the MyPlace portal and other NDIS related ICT difficulties. Other issues we would like to highlight include the lack of ICT support staff and a direct ICT hotline, or dedicated email address; numerous system booking issues; and poor communication from the NDIA regarding major system changes that have significant impacts on providers and participants alike, regarding therapy sessions and payments.

We are keen to appear before the Committee to explain these particular problems and to discuss realistic, feasible solutions. We would be pleased to bring together leaders in the speech pathology profession with expertise and 'real life' experiences of these issues to inform the decision making of the Committee.

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Yours faithfully

Gaenor Dixon
National President

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Speech Pathology Australia's Submission to the Joint Standing Committee on the National Disability Insurance Scheme's Inquiry into ICT systems

Speech Pathology Australia welcomes the opportunity to provide feedback to the Joint Standing Committee on the National Disability Insurance Scheme (NDIS) Inquiry into ICT systems. We have structured our feedback in response to the Terms of Reference and conclude with recommendations that we hope the Commission will find useful. We preface our comments with information on communication and swallowing disability and the role of speech pathologists in improving outcomes for people with communication and swallowing disability.

About speech pathologists and Speech Pathology Australia

Speech pathologists are the university trained allied health professionals who specialise in treating speech, language, communication and swallowing problems. Speech pathologists work across the life span with infants, children, adolescents, adults and the elderly with communication and swallowing problems.

Speech pathologists work in both publicly and privately funded services. In recent years, however there has been a significant shift in the location of service delivery from a previous majority government-employed to the private sector including private practice, not-for-profit and non-government organisations.

Speech Pathology Australia is the national peak body for speech pathologists in Australia, representing more than 8500 members. Speech pathology is a self-regulated health profession through Certified Practising Speech Pathologist (CPSP) membership of Speech Pathology Australia. Speech pathologists are not required to also be registered through the Australian Health Practitioner Regulation Agency (AHPRA). The CPSP credential is recognised as a requirement for approved provider status under a range of government funding programs including the NDIS.

About communication and swallowing disability

Some people have problems with their speech, language, communication and swallowing that are permanent and impact on their functioning in everyday life.

Difficulties in speech, language, fluency, voice, social communication and swallowing can occur in isolation or the person may have difficulties in more than one area. Communication and swallowing difficulties can arise from a range of conditions that may be present from birth (e.g. Down Syndrome or Autism Spectrum Disorder), emerge during early childhood (e.g., stuttering, severe speech sound disorder), or during adult years (e.g., traumatic brain injury, stroke and head/neck cancers, neurodegenerative disorders such as motor neurone disease) or be present in the elderly (e.g., dementia, Alzheimer's disease, Parkinson's disease).

Communication disorders encompass difficulties with speech (producing spoken language), understanding or using language (including oral language, reading, spelling and written expression), voice, fluency (stuttering), and pragmatics (the social use of language), or a combination of areas. There is very strong international and Australian evidence that communication disorders negatively affect an individual's academic participation and achievement, employment opportunities, mental health, social participation, ability to develop relationships, and overall quality of life.

Swallowing disorders affect the ability to safely swallow food or liquids and can lead to medical complications and a reduced ability to safely and enjoyably participate in social, employment and education experiences where consumption of food and liquid is needed. Swallowing problems are common in people with complex disability.

People with communication and swallowing disability span the entire age range and the nature of their difficulties impacts on most areas of life. These people frequently require interventions and supports from multiple areas of public service (including health, the disability and education sectors and mental health services). The clinical protocols for speech pathology treatment are evidence based and backed by strong multidisciplinary scientific evidence for efficacy. Clinical protocols for treatment (in terms of session duration, frequency of care, intensity etc.) differ depending on the clinical presentation and diagnosis – usually speech pathology care is aimed at maximising function for that person.

The Australian Bureau of Statistic's 2015 Survey of Disability, Ageing and Carers (SDAC), estimated that 1.2 million Australians had some level of communication disability, ranging from those who function without difficulty in communicating every day but who use a communication aid, to those who cannot understand or be understood at all.ⁱ

The Final Report of the Evaluation of the NDIS highlights NDIS Participants who are not experiencing improved outcomes are those people with disability who are 'unable to effectively advocate for services on their own behalf'ⁱⁱ. It is highly likely that Participants with communication disability are disproportionately included in this group of NDIS Participants.

Speech Pathology Australia's specific comments relating to the Inquiry's terms of reference

a) The participant and provider experiences of the MyPlace Portal

Payment issues

Speech Pathology Australia has received numerous reports from members of ongoing difficulties and negative experiences with the MyPlace Portal. The most significant was the breakdown of the My Place Portal in June – September 2016, which had a profound and negative impact on the existing speech pathology NDIS workforce and left many of the remainder of the speech pathology workforce feeling very reluctant to enter the NDIS provider market.

During these initial My Place Portal problems, speech pathologists were restricted from lodging claims for payment of services due to technical issues associated with the setup of their provider accounts or the setup of the participant's accounts. The delays in payment for services already rendered had a major impact, particularly on small practices and Speech Pathology Australia had reports of speech pathology business' closing, laying off staff, placing staff on unpaid leave and refinancing their businesses. This situation caused significant financial and emotional stress on speech pathologists in private practice, and continued for almost four months. After considerable advocacy by Speech Pathology Australia (and other allied health peak bodies), it was only resolved following the intervention of Minister Jane Prentice's office.

*"The stress that it has caused for myself and my staff is beyond anything we have experienced. My business partner had to go on indefinite stress leave last year when the portal issues were happening."
NSW member Nov 2017*

Service booking issues

Speech Pathology Australia members continue to express their dissatisfaction and frustration with the MyPlace Portal, particularly in regards to the creation or alteration of service bookings. A service booking is required for every NDIS managed participant to enable service providers to allocate funds to draw down on across a particular time period. Several members have reported being unable to make service bookings for participants, and therefore spending several hours on the phone to the NDIA in order to have a service booking created by NDIA staff. Often numerous phone calls are required, as providers are unable to contact ICT staff directly. This creates a significant additional burden to the process of arranging payment.

“The service bookings and claiming system is an administrative nightmare” NSW member Nov 2017

“I am now trying to negotiate the process of getting paid...It took two phone calls to the NDIS phone line to ascertain that his father needed to ring NDIS and give me permission to see his plan on the portal -I already had a copy of it in hand. Then that didn't appear to make any difference... Two more phone calls and no help from inexperienced phone help staff and two emails to some mythical NDIS support service has not yielded any assistance so far.” Qld Member Aug 2018

These difficulties are not necessarily isolated to a few individual providers. In early July 2018, as a result of the implementation of the 2018/2019 Price Guide, all active service bookings on the MyPlace Portal were altered by NDIA staff. The new pricing required funds to be added on a 'pro rata' basis, adding approximately \$4 to each hour contained within the service booking, but was not meant to change the number of hours that were left within the booking.

However, in practice all service bookings were cancelled and then rebooked by NDIA staff, resulting in a percentage of service bookings being rebooked incorrectly, with less hours. Due to the functionality restriction within the portal, only NDIA staff can alter service bookings that they make, resulting in providers having to manually check every service booking to ensure it had been rebooked correctly, and then contact the NDIA to fix those that were incorrect. Understandably, this created an additional administration burden for providers, as well as delays in the processing of payments for services.

“Service bookings get cancelled for no apparent reason. Clients are not aware of this happening until notified by a provider” NSW member Nov 2017

“I know my service agreements had been altered after July 1st. One had disappeared completely... I have twice been put through to the central support team (well they tried to but had to email them). They never get back to me... I had to end one service agreement just so I could start a new one in the end.” NSW member July 2018

Whilst we acknowledge the recent changes that have been made to the MyPlace portal to attempt to improve functionality, members of Speech Pathology Australia continue to report numerous other issues with the booking system which impact upon their businesses. For example, providers cannot create more than one active service booking per client per organisation. A booking must expire or be inactive before another can be created. This is of particular concern for multi-disciplinary clinics where participants are accessing several different types of services e.g. speech and OT, where services cannot be separated out. This lessens the number of cancellations that are able to be charged (as these are per service booking), and complicates the tracking of funds that are spent on particular therapies.

“only one service booking can be made per organisation at one time. That means we can't do a service booking for speech and a separate one for OT. We could do shorter service bookings but that has its own issues with needing to get families to resign and risking funds not being available at a later point. This

system doesn't work well for families and providers who are working towards having a team that works within the same organisation." SA Member July 2018

Providers also cannot raise an invoice for payment (or 'payment request') from an inactive service booking, even for services that were provided within the service booking dates. For example, plans were altered by the NDIA in early July 2018 in light of the new price guide, this saw many providers unable to claim, as they were not notified that the booking would be cancelled and therefore had failed to submit payment requests in time.

"I have had this happen a couple of times. Both times, the new plan was backdated to the end of the old plan and I was able to get paid (eventually). But, it's not ideal because of issues around service agreements etc (I just keep clear records). The other issue is the possibility that the client doesn't receive therapy funding in their new plan (or reduced funding). This is of particular concern for children who are transitioning out of EI." ACT member June 2018

"Plans change without notice making services bookings and claiming a nightmare When trying to make service bookings, plans either can't be found, or something in the booking is not found eg support category not showing in the drop-down box. Then got to get on the phone each time. At times was on hold for 45mins." NSW member Nov 2017

Other MyPlace functionality issues include:

- Up to 10 September 2018 providers were unable to alter service bookings themselves, relying upon ICT staff to make changes to their own bookings. Even if this was a simple change due to a typing error, providers spent extensive time on the phone to request such a change. From 10 September providers will be able to alter their own service bookings, but not bookings made by NDIA staff.

"Claims processing as clients reach the end of their plan periods and transition to new plans we are unable to claim. Spend significant amount of administration time sorting through this unnecessary process... There needs to be a system where parents can get minor errors on plans fixed. I have several parents that are waiting six months for a simple fix between NDIS pays my provider and NDIS will pay my support provider." NSW member Nov 2017

- Service bookings can only be made for whole hours, at times resulting in additional funds sitting within an inactive service booking unused. Providers have expressed that it is very difficult to have funds released, often requiring a participant to call the NDIA and have NDIA staff resolve it.
- Providers have reported that they have been unable to put two payment requests in for services delivered on the same day. This is problematic for organisations with multiple disciplines, or alternatively when providers are expected to put in separate requests for each aspect of service e.g. one payment request for the therapy session and another for the travel time.
- Providers are unable to see the whole plan and when/where money has been allocated, at times commencing service with a participant, only to discover that the funds have already been allocated to another provider. This means that they are unable to receive payment for their services and must go through the arduous process of trying to get the funds released.

"poor systems/functionality of the portal - having to spend time negotiating service bookings to ensure adequate funds allocated for all services... 'first in first served' type scenarios" NSW member Nov 2017

- There is a lack of information for providers regarding how to use certain features of the portal. Whilst the provider toolkit details how to create a PRODA account, there are no instructions on how to make a service booking or payment request.

Reported participant experiences with the Portal

Members have also reported that *“Portal access has been poor and confusing for parents” (NSW member Nov 2017)*. The MyPlace participant portal is reported to be different to the provider portal, and with functionality further limited, as participants are unable to make any changes. Speech Pathologists have received feedback from participants that they are unable to even find information regarding their plans and what service bookings have been made, and are therefore relying upon providers to inform them of the amount of funds they have left in their plan. This is an unnecessary burden upon providers, who may not be able to provide accurate information as they are not able to see the entire plan as described above.

The Association has received reports that the MyPlace participant portal does not have options to make it more accessible and functional for participants who have a communication disability, or low levels of literacy. It lacks basic accessibility options such as alternative font sizes, and information in other languages, or easy English to allow participants with communication disabilities, or from non English speaking backgrounds to access it. Members have expressed concerns that these issues with accessibility mean that only well educated, English speaking participants with a high level of both written and computer literacy are able to self manage their supports as the MyPlace portal is too complex for many participants. These basic functions result in the exclusion of people with communication disability, and impacts upon their ability to manage their own funds and exercise choice and control.

b) The impact of the role of other Government agencies on the ICT infrastructure

The Association has received feedback regarding the impact on speech pathologists of the interplay between state government agencies who previously oversaw disability providers and the NDIS. Presently speech pathologists who are wanting to register to be NDIS providers have different requirements dependent upon the state where they are registering. For some speech pathologists this requires the uploading of the same documents to different sites, and then the requirement for several different government websites to interact with each other to ensure that the application progresses. Numerous members have expressed to the Association their confusion with this overly complex process, and disappointment that the process was not explained adequately on the NDIS website, or MyPlace Portal.

“ I have had a very difficult and unsatisfactory experience with my attempts to register to work under the NDIS banner:

Firstly, it was very difficult to navigate the process on the NDIS website. The website crashed many times, I could not upload the documentation that was requested, and furthermore, was not sure if what I understood needed to be uploaded was correct.

When trying to contact on the line given, I waited hours for a response. When a time was set for a discussion, this did not happen.

Weeks, months went by and I did not get feedback that my application had even been received. Then, last week I got an email from the NDIS referring to me as a “Provider”. This prompted me to try and call again, and I finally got through to someone who was helpful and found out – with difficulty and much time – that I had, indeed, been accepted by the NDIS as a provider, but that this was PENDING STATE APPROVAL from the WA Government. How is it possible that I would not have been informed about this, or the next steps that I would have to take to ascertain this local West Australian registration.

Finally, I would like to comment that the WA Disability Services Commission requires a considerable application format that includes detailing experience up to 3 A4 typed pages and also referees. It is very

surprising that the general NDIS was prepared to accept my application and did not require this.” WA member August 2017

This has particularly affected members in WA, where until 2018 it was not clear on the NDIS website whether they must register with the Disability Services provider panel, or the NDIS first, and there were reports that completing this sequence incorrectly resulted in some speech pathologists being stuck in ‘limbo’ as one system would not accept that the process had been initiated by the other. Subsequently, following WA joining the NDIS, providers who were registered under the initial state specific WA-NDIS must re-register under the NDIS and commence using the MyPlace portal. The differences between the two systems are marked and have added to the administrative load for providers.

c) The appropriateness of the MyPlace Portal and agency facing IT systems

Feedback from Speech Pathology Australia members suggests overwhelmingly that the MyPlace portal and other IT systems are overly complex, difficult to use, and require significant improvement. Following the release of the most recent NDIS quarterly report (June 2018), the MyPlace portal must now service the needs of more than 16,700 providers, and almost 184,000 participantsⁱⁱⁱ, therefore it should have its own dedicated, purpose built platform, and a team of large team of ICT staff dedicated to resolving any issues. It has been reported that the current NDIS systems are operating on old Centrelink platforms, rather than their own dedicated system, and additionally there are significant limitations placed on the number of ICT staff that are able to be employed.

Speech pathologists are reporting significant wait times for assistance with ICT issues, as well as difficulties in using the MyPlace portal as described above, from ‘logging in’ issues, to making service bookings and payment requests. The NDIS ICT systems are also frequently unavailable due to ‘service improvements’, further affecting the user experience.

“[the] portal is slow, clunky and not user friendly to say the least” NSW member Nov 2017

“Billing and administrative difficulties - portal/IT difficulties [it’s] laborious to use and frequently slow and freezing - clients also having difficulties with portal “ NSW member Nov 2017

Additionally, the complete reliance on an online system disadvantages those who have poor or limited internet access, or limited computer literacy. As it operates through the My Gov platform, it is not always compatible with older software versions, or accessible via smart phones. For many participants this is the best or only internet service they are able to access, for example, one member reports that a family in a rural area is only able to access internet for a few hours in the morning, as the satellite dish they are required to use overheats and shuts down after midday.

d) The impact of ICT infrastructure on the implementation of the NDIS

The speech pathology NDIS provider market reflects a small but specialised disability service within the NDIS market. Speech pathologists provide services across the lifespan, and work across a range of business structures, including large companies, multi-disciplinary organisations, and small or sole private practices. It is not uncommon for Speech Pathology Australia members to provide clinical services, in addition to managing the business and payroll demands of their practices.

At present there is a cap on the number of NDIS staffing positions, which affects all departments in the NDIA. There are considerable delays in having ICT complaints and issues resolved, and as payments

can only occur through the MyPlace portal, this can cause financial strain and have a significant impact on their business sustainability, as we witnessed in late 2016.

"We have had multiple ongoing issues with being able to claim for payment: - Agency managed clients - portal issues, system/ computer 'glitches' resulting in hours of chasing often for one payment." Member Nov 2017

"Insufficient and lack of experienced staffing at NDIS means poor support, slow response rates and very poor communication with providers and participants...Difficulty claiming and processing service bookings." NSW member Nov 2017

Speech Pathologists must register as providers through the MyPlace Portal, however, the NDIA can only approve their registration for Therapeutic Supports. Other registration groups, such as Early Childhood Supports or Specialist Behavioural Supports must be approved through the provider's state based system. The processes differ extensively from state to state, however one consistent issue is that once a provider has been approved by their relevant state body, there is no communication back to the NDIA. It has been reported that perhaps providers are expected to upload evidence of their approval, however this is not made clear. This results in some speech pathologists remaining unregistered, despite potentially receiving approval, or potentially providing supports they are unable to claim for, because they are not registered for that support on MyPlace.

The burden of absorbing lengthy wait times for payment to occur, due to a portal 'glitch', scheduled maintenance, or difficulties in creating timely service bookings and payment requests has proven too much for some providers and they have chosen to de-register from the NDIS. Speech Pathology Australia receives regular communication from speech pathologists who are delaying entering the NDIS market, reducing the share of their practice caseload of NDIS clients and/or restricting service to self-managed clients only in order to avoid the costs associated with excessive administrative burden. The continued restriction of registered speech pathologists may lead to thin markets, which is of particular concern in areas that require specific knowledge and skills, or rural and remote communities.

"I'm also unimpressed with the delays in payments, time taken to complete required paperwork... difficulties I've heard navigating the online processes. There are so many time wasting elements that it's not worth my while. This means people who could access my specific services are unable to because the system is so fraught with difficulties." NSW member Nov 2017

Members have reported an increased administration burden of providing services through the NDIS and having to use MyPlace (in comparison to other funding streams including BetterStart for Children with Disability, Medicare, Department of Veteran Affairs and private health insurance). Many practices have resorted to employing additional administrative staff to work solely on NDIS administration processes including managing service bookings and payments through MyPlace. The additional excessive administrative burden cannot continue to be absorbed into the per hour NDIS fee for speech pathology services for many private practitioners.

"as an NDIS registered provider I have had to employ an extra full time admin person, therapy staff spend a large amount of time on NDIS paperwork, we have outstanding payments that my admin has spent hours on the phone and via email chasing, I personally have had to reduce my caseload from 4 days per week to just 2 so that I can stay on top of all the NDIS requirements. There is a huge financial and time burden to being an NDIS registered provider." NSW member March 2018

"the administration time needed to manage our small business (of 1 full-time and 2 part-time therapists) has gone from approximately 4hrs per week to at least 15hrs per week due to dealing with NDIS clients. This does not include clinical reporting for NDIS clients, but simply the work needed to ensure compliance and payments." NSW member Nov 2017

The NDIS quarterly report (June 2018) revealed that only half of all registered providers are 'active', or have put through a payment request in the past 6 months. While no detail is provided as to the reason for such low 'activity' we would not be surprised to learn that it may be due, in part, to the difficulties in using the MyPlace portal, creating service bookings, and submitting payment requests. Additionally, the plan utilisation rate is currently only 64 per cent, suggesting that participants are also struggling to use the supports that are provided within their plans.^{iv}

The feedback from our members suggest the difficulties that participants experience with the ICT systems, and difficulties that rural participants experience with reliable internet access limits the number of participants who are able to access the participant portal, and therefore self-manage. Additionally the lack of accessibility features within the ICT systems discourages participants, particularly those with additional communication needs to self-manage, or even access the participant portal.

The provision of different portals/platforms also reinforces the premise that providers and NDIA staff are arranging services and payments around the participant, and if they are not able to log in, or access reliable internet on a desktop then they lack choice and control around the management of their supports.

e) Any other related matters

Changes to claiming processes

Speech pathologists have consistently been financially disadvantaged as a result of poorly considered or communicated decisions by the NDIA and difficulties with the ICT process or system. For example, a number of speech pathologists have reported that, after continuing to provide services to participants during the 'gap' between plans (as explicitly encouraged by the NDIS) they have been told that they will not receive payment for these services because the participant has been refused a further plan/funding, and they are unable to claim from an 'inactive' service booking.

In other instances, speech pathologists have purchased items of equipment for participants after being told that they would be able to claim payment for these items from the therapy or transdisciplinary support part of the participant's plan, only to find that the support item which they used to claim against no longer exists on the portal. After spending many hours trying to get information from the NDIA, they were finally informed that a decision had been made to change the processes for claiming several weeks earlier, and they would not be reimbursed for resources purchased for the participant.

"The rules keep changing with no communication, they are making it harder and harder for small private practices to keep up with all the admin requirements. I have to put more admin staff on to meet the requirements. Children are getting less and less funding so it's become a money grab when it comes to the service bookings which just adds another administrative nightmare." NSW member Nov 2017

Lack of communication

Speech pathologists are consistently highlighting the lack of communication from the NDIA regarding changes to ICT processes, service bookings and portal outages. The responsibility sits entirely with speech pathology providers to check the portal and latest NDIS news, with no provision for alerts or notifications.

"They also 'modified' my service booking to less \$ than I originally had in the service booking and then tried to tell me it was because that's all I had put into the service agreement. No messages as a courtesy

to let me know. Just a rejected payment request. Very frustrated with the lack of correspondence of something so important.” NSW member Dec 2017

“I had a client receive a new plan from NDIS before the expiry date of the old one & failed to inform me of it so when I went to claim any dates after the start of the new plan they could not be claimed. 45 minutes on phone with NDIS to figure that out” NSW member June 2018

Members are also struggling to contact staff who are knowledgeable about their specific question/issue, and therefore spend lengthy amounts of time on the phone trying to find resolution to their problems, often remaining unable to be paid until the issue is resolved by ICT staff. There are several reports from members who have been waiting for many months to be paid.

“I’m not able to claim payments using the online portal despite numerous calls to the NDIS over the past 6 months and no solution...I’ve followed the instructions from the provider toolkit by myself and with an NDIA consultant over the phone and I’ve emailed the provider payment team twice. They seem to think it’s a system glitch but aren’t able to put me through to anyone who can help.” NSW member July 2018

“Payments and services bookings have also been an issue at times, leading to increasing time (e.g waiting on hold for 52 minutes to find out that they could not answer my question, then having to wait another 2 months for a solution).” Member Nov 2017

“No consistent person dealing with the one issue. May have to call three to four times about the same issue as no one ever returns your case. Once any documents are launched on the portal it’s a waiting game as you do not receive contact from NDIS to acknowledge that they have received it or what time frames you could expect a response.” NSW member Nov 2017

Concerns regarding the Commission website

Following transition on 1 July 2018 Speech Pathology Australia members who are in NSW and SA must now register with the NDIS Quality and Safeguards Commission. This is a different organisation with its own website, and an entirely different set of processes, rules and requirements. The Commission website was in Beta form until September 2018 and many of the processes and documents, such as training packages that are required for compliance are not yet live. Speech pathologists have expressed concerns that they will not have enough time to meet registration and compliance guidelines due to the immature nature of the website, and lack of communication and follow up for current providers.

There is also confusion for some speech pathologists who fell between the two processes as part of their registration. For example, a member from SA recently sought assistance as she had received her registration for therapeutic supports from the NDIA, and then her approval for early childhood supports from the Department for Communities and Social Inclusion, however, as they had not uploaded her approval to MyPlace she was not registered with the Commission for this group. The NDIA will no longer assist her, as she is under the remit of the Commission, and the Commission does not have a record of her registration, forcing her to have to re-register at a significant additional cost.

Recommendations

We request the Committee consider the following recommendations:

1. Increase the number of ICT support staff not only to improve the website functionality but also to resolve issues experienced by providers, such as speech pathologists, and participants as they arise.
2. The ability for speech pathologists and other providers to contact ICT staff directly, either through the provision of a direct ICT hotline, or dedicated email address. Ensure payment based ICT issues are prioritised to lessen the financial burden on members providing services under the NDIS.
3. Improve the accessibility of the NDIS website, and MyPlace participant portal to allow people with disabilities, including communication disability, to be able to access the portal, and potentially manage their own supports.
4. Provide step-by-step guides for speech pathologists and other providers regarding certain MyPlace functions (similar to the fact sheets for participants that have recently been produced), including how to make a service booking and how to make a payment request.
5. If a dedicated ICT hotline is not provided then train 'frontline' staff who answer calls to the 1800 number, so they are able to answer ICT issues.
6. Improve communication with providers, perhaps in the form of individual email or text notifications, particularly regarding registration, portal outages, and ICT improvements.
7. Consult with providers and participants to see what improvements can be made to the portal to improve its usability and to trial new functions before they are introduced.



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