



**20th February 2018**

**Uniting Country SA submission to the Home Parliamentary Business Committees  
Joint Committees – Joint Standing Committee on the National Disability Insurance Scheme –  
Market Readiness**

Uniting Country SA's primary purpose is to care for country people. Based in Port Pirie, our services cover the three state government regions of Yorke and Mid North, Far North and Eyre and Western. With over 250 employees and 200 volunteers, we are the largest non-Government community services provider in the region, delivering a wide range of services to support the most vulnerable in our communities. We currently provide person centred supports for people in our region who have disabilities.

Uniting Country SA's submission to the terms of reference on market readiness for provision of services under the NDIS, is as follows.

**Participant readiness to navigate new markets**

It is evident to our organisation that the lack of transparency about the processes and frameworks in which we are working has a huge impact on participants entering into the NDIS. There is currently very limited ability to contact NDIA and access a consistent person or consistent response. Further to this when requesting to speak with a particular NDIA staff member we are only provided with a generic email and phone number, even when they are working through a particular issue with us. NDIA staff only provides first names so when you call them back (often requested by them) it is difficult to locate the person you were originally speaking with. This results in poor and inconsistent information provision and no accountability as it is difficult to state who provided us with the information. Even when a direct email address is sourced, emails are not responded to.

**Recommendation:**

Have clear communication protocols that enable families, carers and organisations to easily communicate with NDIA including the ability to access the same person to create consistency.

Participants have not been adequately prepared for the change and a high number do not have the skills to clearly articulate their needs and navigate the system. We believe participants skills will develop over time but at this point they are in need of extra assistance to ensure they can clearly define their needs to access an appropriate plan.

Due to KPI's, planners are rushed and asking closed questions which are being misinterpreted by participants who have spent their lives focussing on their "A – bilities" not their "DISA – bilities" Organisations that know the participants well have very limited opportunity to provide that information to the planners in order that they are more properly informed. In an effort to avoid conflict of interests' participants are being hugely disadvantaged by not being able to have their worker who understands their needs assisting them through their planning session. We fully support the choice and control of the scheme but the impact of this particular requirement is resulting in very negative unintended consequences for participants. These include:

- Inadequate plans
- Inadequate services
- Plans having to be reviewed almost as soon as they are completed which further congests an already very congested system and comes at a high cost in both time and money.

***Caring For Country People***

At times there is no communication that a review has occurred or reviews are not occurring in a timely manner which means the client's original plan is no longer valid leading to clients having no service or service providers providing services that there is now no plan to fund.

An example of this was a client who had a plan due to expire. Despite our staff member making calls to the NDIA well before it expired and being reassured the person's plan would be reviewed before it expired there was not even any contact made by a planner prior to the expiry date. UCSA and other providers involved with the person were told they needed to continue to provide services and hope that they may get paid retrospectively once the review was completed but there were no guarantees. One of the services being provided to the client was bath and bed time routines as well as taking them to school. With no plan in place the provider who was providing this service said they would not be able to continue services. When we asked NDIA where that left the client the person we spoke to agreed with us that probably our only option was to go to our local MP's 'because that usually got things moving along'.

**Recommendation:** Ensure NDIA participants have suitable support persons available to attend planning meetings.

### **Development of the disability workforce to support the emerging market;**

Developing and sustaining a workforce of casualised staff who are paid at a low hourly rate is very challenging. A significant amount of investment is made at UCSA in any new staff member including thorough orientation, training in five core competencies and ongoing regular supervision. An investment like this in the workforce needed for the NDIS is financially not viable however if the investment is not made then potentially the high standards of service delivery achieved throughout the rest of the organisation may not be replicated for clients within the NDIS. This investment into preparing our NDIS staff combined with being a values based organisation who doesn't turn people away who are in need means the organisation is underwriting the scheme significantly.

#### **Recommendation:**

NDIA has a provision for training, induction, orientation, supervision of staff included in pricing.

### **Impact of pricing on the development of the market;**

NDIS is a fee for service program which has limited ability to charge for many services provided, mostly around assisting participants to prepare for the NDIS, as well as inadequate pricing for other services. Funding for transport in country regions is a good example of this as there is usually no public transport or taxis and no services near where clients reside.

Currently NGO's are underwriting the scheme through the high number of unbillable hours they are providing the clients in order to assist them through a very difficult system along with providing services that clients need that have not been included in plans due in the main to the way the plans have been written. In one instance UCSA have provided around 100 unbillable hours to one client in order to assist them through the process of obtaining their plan – from an organisational perspective this is simply not sustainable.

NDIS takes advantage of the values based service provision of some NGO's whose philosophy is to assist participants when they are clearly in need. This combined with the tyranny of distance in regional areas means NDIS providers are underwriting the scheme to a high level. "Reasonable and Necessary" has very different implications in regional settings versus metropolitan settings and needs to be revised from a "one size fits all" principle

#### **Recommendation:**

NDIA need to develop an improved understanding of what it means to be living and working in regional areas and adequately fund the cost to providers of delivering a service in regional areas including travel.

**Market intervention options to address thin markets, including remote Indigenous communities**

Thin markets are different to remote markets and each needs to be looked at individually with their own strategies developed. Small rural towns that are some distance from a regional centre need to be considered for a type of “remote loading”. South Australia has a high number of small communities dotted throughout the state who have very limited services and have to rely on the regional centres – which are also relatively small. South Australia’s population distribution needs to be considered and treated differently to the eastern states where the distribution is significantly different.

**The impact of the Quality and Safeguarding Framework on the development of the market;**

We fully support quality and safety standards at the highest level however this new framework should not overburden NGO’s with another layer of compliance but rather should ensure existing relevant standards and accreditations are being met.