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6 September 2019

Joint Standing Committee on the National Disability Insurance Scheme  
PO Box 6100  
Parliament House  
Canberra ACT 2600

To Committee Members,

### **Inquiry into Supported Independent Living**

Uniting Vic.Tas welcomes the opportunity to provide comment to the Joint Standing Committee on the National Disability Insurance Scheme (NDIS) on the Inquiry into Supported Independent Living.

#### **Uniting's experience with Supported Independent Living**

Uniting is the community services organisation of the Uniting Church in Victoria and Tasmania. We are more than 7,000 people delivering over 770 program and services to people experiencing disadvantage including children at risk, aged and carer services, disability and mental health, employment services, alcohol and drug dependence services, housing, family violence and early learning.

We are a registered provider of disability services under the NDIS and take a person-centred approach to all our services. Our focus is to help people be independent, get involved with their local community, and achieve their goals. Our Supported Independent Living (SIL) programs assist people with disability with tasks of daily living in a shared living environment. Our services include the Neurological Support Service, a residential support service providing holistic care for people with Huntington's disease, multiple sclerosis, spinal or acquired brain injuries.

In accordance with the Terms of Reference, our program staff have identified several areas for advice to the Committee. These are as follows:

#### **1. The approval process for access to SIL**

##### **Timeliness of Specialist Disability Accommodation approvals**

In our experience, there are extensive delays for all NDIS participants to receive Specialist Disability Accommodation (SDA) eligibility. NDIS participants are unable to move into our services until their SDA eligibility is approved and we currently have many people who have experienced long delays.

##### **Timeliness of SIL funding approvals**

In relation to SIL funding approvals, Uniting still has outstanding quotes from 2018 that the NDIA are only now seeking an updated quote or asking us to review our financials.

The timeliness of the interface between the plans and the SIL quote also needs improvement. Currently, the NDIS requests SIL quotes be submitted to NDIA around 6 weeks before planning meetings, which makes it difficult to determine what community participation to take into consideration, especially if there are changes from the previous year. Such situations lead to gaps in support or doubling up.

### **Communication between the NDIA and SIL providers**

A lack of communication by the NDIA during the approval process adds complexity to navigating this process. Some examples from our program staff illustrate this issue:

- When Uniting staff submit a SIL quote they receive an automatic response but no personal contact updating them about progress or any issues emerging. Instead, Uniting staff must actively follow-up to understand what the delay is and often have had to explore many avenues to get adequate communication.
- When a SIL quote is approved, a new service booking just appears in the system without any communication with our staff.
- There has been no communication or discussion by the NDIA with Uniting when service bookings are made at a lesser amount than quoted or when the NDIA amends service bookings.

### **Communication within the NDIA**

Uniting staff report a lack of communication within the NDIA between the area that receive the SIL quote submission and the NDIA planners. For example:

- It can take some time between submitting a SIL quote review for a participant and receiving communication about negotiating prices, and in the meantime this confusion and delay has direct impacts for families.
- There have been occasions when a Uniting staff member was in negotiation with the SIL team around post July rates and the NDIS planner created a service booking before these negotiations were finalised.

## **2. The vacancy management process, including its management and costs**

### **Vacancy process is slow and convoluted**

The current vacancy process is extremely slow and convoluted. To illustrate, when a bed becomes vacant the current process requires the following steps:

1. Uniting is required to notify DHHS immediately when a bed becomes vacant
2. Uniting completes paperwork regarding the vacancy and submits this DHHS vacancy team
3. DHHS place an ad on the 'housing hub'
4. NDIS applicants go to an 'open for inspection' and, if interested, apply for the vacancy
5. Applicants are then forwarded to DHHS and Uniting's service for consideration
6. Uniting look at whether the applicant is suitable for the vacancy, which includes consideration regarding compatibility and care needs
7. Once the panel (DHHS and Uniting) agree on a preferred applicant then we proceed for them to transition into our SIL services.

Uniting currently have SIL vacancies that date back as far as January 2018.

### **Delays in SDA eligibility**

When Uniting staff are able to find suitable participants to fill vacancies it may take NDIA months to approve the SDA eligibility. Long delays in SDA eligibility approvals cause long delays for NDIS participants in being able to move into our services. This

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impacts on the lives of NDIS participants and their families who greatly need the support of our services.

Uniting recommends some actions to help participants move into accommodation more promptly. These include:

- Increasing communication about the process to NDIS participants in the community to assist with filling vacancies and increased applications - as NDIS participants and their families can be confused about how to apply for accommodation.
- Enhancing support for NDIS participants to undertake their Occupational Therapist assessments and/or equipment and have their other key care plan information (for example, epilepsy management plans) ready to go so they do not have any barriers to moving in.
- Allowing a participant's eligibility to be approved *before* they apply for vacancies, so we do not experience delays. This is contrary to advice from DHHS that they are required to consider NDIS participants who have not yet been approved.

### **Interim funding is required for vacancy management**

Uniting is not funded for vacancies despite the reasons for a bed being vacant often being outside our control, such as:

- *SDA approval delays:* SDA approval delays by the NDIA have significant flow-on impacts on our financial viability of our services because Uniting is not funded for vacancies.
- *Client mix:* Participants who show interest in SIL are sometimes not a good fit for the client mix in the home. In such cases, we do not put someone who is inappropriate into SIL to cover a vacancy, yet we are financially impacted when a bed is left vacant.
- *Client death:* If a client death occurs, due to our ageing consumer population who often experience complex disabilities and illnesses, then Uniting have no funding in the interim until we can fill that late vacancy. This significantly impacts for our services, given there have been several deaths over the past year.

Uniting is currently absorbing the cost of vacancy issues that are clearly outside our control. As such, Uniting recommends that interim funding be made available for vacancy management to compensate the financial impacts of having a bed vacant.

## **3. The funding of SIL**

### **Lack of clear process for claiming above the benchmark**

To date, there has not been a clear process on the flexibility of claiming above benchmark set by the NDIA. This impacts the financial stability and viability of Uniting's SIL program. For example, our program staff report that they:

- Continuously have outstanding SIL service bookings and are then are told that they need to change our rates a year after the fact.
- Wait months to a year for a SIL quote service booking to be made.
- Have had many quotes approved using Uniting's rates and then suddenly NDIA changed the rate and will not approve any further outstanding SIL quotes at the level Uniting were quoting at. Consequently, Uniting have had to then renegotiate rates and re-work all our outstanding quotes to get them approved.

There is also difficulty with participants at the houses having plans expiring at different times of the year. Although each plan is individualised, the SIL needs to be

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viewed as a whole. For example, if an individual's support needs increase from a ratio of 2:3 to a ratio of 1:1 then this impacts the other two staff and their funding amount, as we would have quoted for the other two participants to also be a 2:3 ratio.

### **The impact of long delay in NDIA payments**

SIL is funded by the NDIA. Uniting submit our SIL quotes to the NDIA for approval. All SIL quotes are individualised and are based on the person's support needs. There have been long delays in relation to the NDIA communicating about SIL quotes and if quotes have been approved or require amendments or changes. While Uniting have seen some improvements, there is still SIL funding that has been outstanding for many months.

Uniting are concerned that delays with the NDIA approving SIL quotes has resulted in the participant's NDIS plan being delayed. There are occasions where this has caused providers to 'pull out' from service delivery, as they have not been paid or cannot claim funds without a current NDIS plan.

## **4. Other issues with SIL**

### **SIL workforce and rosters**

Another challenge for Uniting relates to managing our SIL workforce and rosters. SIL requires a flexible workforce that can meet the needs of our residents across multiple locations. Currently, our rosters include a fixed location for permanent staff and rosters do not vary. Under the NDIS, if a resident moves out or goes on extended leave, we are not funded for these occasions. As a sector, we need to work through how we manage such issues both financially and industrially.

SIL funding has seen an increase in support hours to our residents – a position Uniting commends as extremely positive. However, this also has required Uniting to source additional staff to deliver these additional hours, which is a challenge for our service due to workforce shortages.

Finally, Uniting is pleased to see that attention is being drawn to these issues. We hope to see prompt SDA eligibility approvals with no delays, funding considerations for gaps or loss of funding, support in how to navigate SIL workforce and rosters with vacancy management, and an overall vacancy and SDA accommodation strategy that works for everyone.

Thank you for the opportunity to comment and we look forward to seeing the outcomes of the Inquiry into Inquiry into Supported Independent Living.

Yours sincerely,

Stav Stathopoulos

**Acting General Manager, Disability & Mental Health Services**