

Paragon Support Limited

PO Box 4057  
Manuka ACT 2603  
6 September 2019

Committee Secretary  
Joint Standing Committee on the NDIS Scheme  
Supported Independent Living  
PO Box 6100  
Parliament House  
CANBERRA ACT 2600  
AUSTRALIA

Dear Sir,

**RE NDIS IMPLEMENTATION, PERFORMANCE AND GOVERNANCE - REPORT  
INTO SUPPORTED INDEPENDENT LIVING**

Please find attached my submission to the four areas you have identified as

- a) the approval process for access to SIL;
- b) the vacancy management process, including its management and costs;
- c) the funding of SIL; and
- d) any related issues.

Thank you for the opportunity to comment.

My comments on the attached document can be published and there is no confidential material.

Yours faithfully,

David Parkin  
Director  
Paragon Support Limited  
Registered NDIS Provider

Attachment  
Joint Standing Committee on NDIS SIL

## ***Joint Standing Committee on NDIS SIL Submission***

### ***Background***

Paragon Support Limited was established mid last year and started trading on 1 July 2019. Paragon Support Limited is registered as a Charity with Public Benevolent Institute status.

We are managing the staff in one ACT Government owned house. There are seven staff who support the four participants living in the house. The house operates on a 24/7 basis with the staff on a rotating roster. We are funded through NDIS SIL for the support of the house.

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

My comments are noted as a new SIL Provider. We have not yet been through the NDIS Quality and Safeguards audit process. Becoming a SIL Provider was an onerous task undertaken through the ACT Human Resources Services. The NDIS Quality and Safeguard Commission has taken over this role from 1 July 2019. We are a registered SIL Provider.

Paragon Support Limited took over from another management company and support four participants and 7 staff in a well-established SIL funded house. In the beginning the NDIA Canberra staff helped us transition into the SIL space. We accepted the existing SIL quote knowing a review of the four participants and SIL would happen within several weeks. The NDIA requested all plans and SIL align. The NDIA staff in Canberra were extremely helpful and everything functioned flawlessly.

Within one week of establishing the operational company we needed to supply the SIL quote to the SIL Team. This was done on best estimates of what was being supplied in each of the participants NDIS plans. The four participants have been through their NDIS plans. Consequently we have been asked to update our SIL quote. Our major concern is two of the four house participants have had their new plans approved but there is no sight of the remaining two house participant plan although being reviewed at the same time. Email queries to NDIS SIL about the other plans have been met with no replies.

When the first two participants had their plans approved all funding from their old plans ceased, including SIL. We have not been able to claim any SIL funding for these two participants from 12 August. We just have to wait until the SIL is approved. As a small business we still need to pay staff and on-going items like Workers Compensation and other insurances. Attempting to address this through emails has resulted in dead silence.

If the NDIA wants ALL participants and SIL funding to align then as each participants' plan is reviewed it needs to be set aside until they are all complete and the package released together. At present it appears to be ad hoc and no one is coordinating the process. For two weeks and many emails we had no response from the SIL Team. Questions go unanswered.

Since the new plans have been in place the process has been stressful and NOT necessary. It appears that areas within NDIA do not communicate with each other even through the various sections (NDIA Plans and SIL) are linked and dependent on each other.

The SIL quoting spreadsheet tool is good. It is snap shot of a ‘typical’ week. More flexibility is required in the NDIA SIL Team reviewing this as participants are not always regimented to one week cycles in their activities.

More resources are required to bring the review times down to below 4 weeks. The current 8 weeks is a nonsense, especially if a SIL team has been established to review all SIL quotes. The aim needs to be about 2 weeks.

#### Recommendations

- 1) The SIL quoting tool is good but just needs a few minor adjustments to allow numbers to align between each participant and final submission tabs.
- 2) If the participant need to have NDIS Plans approved then put the SIL quote in after the NDIS Plans, not 8 weeks before.
- 3) Needs to be a mechanism to keep claiming SIL until new SIL approved even if participant’s Plans are approved.
- 4) Make the SIL team and NDIA Planners work together

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

Different processes need to put in place for difference vacancy scenarios. There needs to be different mechanisms in place if a participant dies or is hospitalised and will not return to the SIL house or there is a major reportable incident. A different approach needs to be in place if the participant just wants to change houses.

The SIL Team need to be properly resourced to react quickly to the various situations. A specialist SIL group, within the SIL Team, needs to be setup to address “vacancies”.

Paragon Support Limited offers suggestions for some scenarios

- If there is a sudden death or hospitalisation where the participant will not be returning to the house the SIL funding needs to continue for at least one month. The SIL provider would claim the SIL funding during this period or until a new participant arrives to fill the vacancy. If the participant has been a long-term resident then it will be difficult for the others in the house to accept a new person. A mourning process needs to adhere to so all can move on. These residences need to be treated as a home not just a business. The question needs to be asked, “How would we cope if a family members dies but immediately we need to look for a share person to fill the vacant room?” After one month the SIL funds need to be reviewed but not cut off.
- For a major reportable incident, eg abuse, then the SIL funding needs to cease immediately. This will require the abuse to be proven but hopefully given the NDIS Commission this can happen extremely quickly. It is assumed the participant would have left the house.
- For a participant just leaving the house. There is a Service Agreement in place that would normally state the participant needs to give 4 -6 weeks’ notice. During this time the current SIL provider would claim the funding as the participant would still be there. When the participant moved it would only be after this period the new SIL provider would have access to the SIL funding. If there is an agreement between the old and new provider this period could be waived.

Any scenarios requires professional and flexible approach to vacancies by the SIL Team.

However, when a participant leaves a house there is always the staff to manage. A majority of the SIL funding goes to staff wages and having one participant leave does not mean the equivalent staff can be removed from the roster. The industry is attempting to build a strong workforce but retrenching staff is not the way to build trust in the industry. We do not want to employ staff on weekly contracts so they could be terminated at the end of the week.

In a lot of instances, the existing staff will be required to manage the remaining participants especially in small group house. Most of the work does **not** stop but there is large payment gap in not being able to claim the participant's SIL who is no longer in the house.

If the house has a great team of dedicated staff the management company does not want to have to immediately sack some of these staff. Some adjustments can be made and most staff would take a reduced salary (reduced working hours) for a short period of time. The SIL provider should not have to burden all the costs.

A major issue is when a participant vacates the house, of whatever reason, then a new SIL quote will need to be generated and submitted for review of the SIL Team. As noted on the SIL information the SIL Team need at least 8 weeks to review a quote. This is totally unacceptable. The SIL Team need to respond quickly. Many small businesses do not have the financial resources to carry months of inaction by the SIL Team. If one participant leaves and there is a gap then the SIL quote would need to be adjusted to say 1 to 4 ratio of staff to participants to 1 to 3 It is NOT just a matter of not claiming SIL for the one person that has left.

When a new participant arrives a new SIL quote will be required to support the new participant. The SIL process starts again. The SIL Team need to be resourced to quickly review the new quote.

At the end of one month then a review needs to take place by the SIL vacancy team to either stop the SIL funding or fund at a reduced level for another one month. At the end of this second month the SIL funding would stop.

The SIL provider needs to notify NDIS SIL Team within 7 days that a participant will be leaving. A new quote has to be supplied within that 7 day period. The NDIS should NOT trigger a review of all the other participant's plans. The SIL Team need to address this quote quickly. The normal funding amount needs to be claimable during this time.

#### Recommendations

- 1) A specialist "vacancy" SIL team be setup to review all vacancies. This needs to be properly resourced so quick approvals can happen, say within two weeks maximum.
- 2) The SIL funding continues as per pre-vacancy until the SIL Team address the new quote. This may expedite the SIL Team review.
- 3) When a new participant arrives in the house do NOT have all participants in the house go through a NDIS Plan review to achieve alignment of plans.

#### *The funding of SIL*

For a small company with extremely low overheads and few office staff the funding is adequate. This would be true for the management of few houses with minimal staff and possibly operating out of a home office. Once staff and renting office space is required the funding is marginal.

For medium sized companies the middle management grows and needs to be funded. There should be NO funding differences for different sized companies. This will only drive inefficiencies within these companies.

Large companies do not necessarily bring economies of scale. They generally have high middle management and senior staff costs and associated overheads. All of which needs to be funded for the SIL package. This should **not** be the model NDIA works towards as the funds will be directed to companies rather than participants.

Making a NDIS claims through the Portal for providing the SIL is straight forward if everything is in place.

Salaries for staff in the houses are terrible. Many are governed by the SCHADS award which needs to see an increase to force the NDIA to increase their funding to the support companies. When annual NDIA reviews for price increases the higher paid OTs get rewarded well but staff at the bottom are forgotten, just scrapping with minimal increases. This needs to be addressed.

#### Recommendation

- 1) Encourage small to medium companies into this space.
- 2) In most cases the currently funding is adequate.

#### ***Any other matter***

- 1) Access to the NDIS National SIL Team in the first instance is extremely difficult. All we have is a SIL email. When calling the general NDIS 1800 telephone number the operators can not put you through to anyone associated with SIL. After writing an email one just waits and hopes that an email arrives in my in box, which could takes many weeks.
- 2) Having a National SIL Team reviewing all the SIL quotes is a good idea BUT like most of the NDIS it appears to be under funded and under resourced. If the NDIA is going to put these initiatives in place they need to make sure adequate staff are in place and understand the processes before going national. One would hope that there would be some consistency within the SIL team to evaluate each SIL quote quickly. The time frame of 8 weeks to review a SIL quote is not acceptable, it needs to get to two weeks.