

Submission to the Joint Standing Committee on the NDIS – ECEI Approach

August 2017



Background

Scope Australia was established as the Spastic Children’s Society of Victoria in 1948, and our organisation has been delivering services and supports to individuals and their families for well over 60 years. As a not-for-profit organisation, we support children and adults with developmental delays and disabilities to achieve their goals in life. We aim to provide support when and where needed, whether in the family home, at child care, kindergarten or school, in the community or at one of our service locations. Our mission is to enable each person we support to live as an empowered and equal citizen.

As one of the largest providers of early childhood intervention services across metropolitan, regional and rural areas of Victoria, Scope currently assists over 1,000 children and their families. We are funded by the Victorian Department of Education to deliver Early Childhood Intervention Services (ECIS), Early Childhood Intervention – Flexible Support Packages, the Kindergarten Inclusion Support Packages and the Pre School Field Officer Program. We are a registered service provider of the Australian Commonwealth Government - Helping Children with Autism, the Better Start Initiative and the Better Start Early Years workshops. We are also currently delivering an NDIS ECEI service to 135 participants and their families in Victoria.

The early years are a core component of our organisation’s services, and Scope is committed to ensuring that our early childhood intervention services reflect current best practice and are evidence based. We adopt a family-centred, strengths-based approach in supporting families and children, with our service model guided by the significant evidence-base for effective early childhood intervention services, including the 2009 Department of Education ECIS Literature Review. Our service delivery principles include:

- Family centred practice
- Family partnerships
- Delivery within everyday learning environments and family routines
- Recognition of a child and family’s individual resilience and strengths
- Capacity building approach
- Recognition of diversity
- Inclusion in a universal continuum of early childhood services
- An ecological perspective (emphasis on the fit between child and family and their environments)
- Parents as experts on their child and advocates for their child
- Children’s rights to education, social inclusion and quality of life
- Families’ rights to respect and access to community activities

The NDIS ECEI Approach

We support the ECEI’s evidence-based approach to achieving the best outcomes for children, including the development of national guidelines and endorsing key principles. This is assisting the effective transition of early years clients into the NDIS and enabling the early identification of supports that lead to an effective

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planning phase for the NDIS. Additionally, this is supporting new families who are unfamiliar with navigating a service and may be experiencing anxiety as a result. The ECEI Early Years Partner is will provide independent advice to families.

Recommendation: We recommend an approach that reflects both the National Quality Framework and the Victorian Early Years Framework to enhance inclusion and participation opportunities for children and families in early childhood education and care services, and in the wider community.

Eligibility criteria for determining access to the ECEI pathway

Meeting the NDIS early intervention requirements will depend on factors such as overall functional capacity to undertake daily routines, and is not based solely on a child’s diagnosis. This is a broad domain that will ensure that no eligible child will be missed. The adoption of functional based assessments reflects current best practice, as it demonstrates the degree of delay/strengths for effective intervention that are relevant and deemed effective to the child, with appropriate expected outcomes. This incorporates a strengths based approach in comparison to a deficit based model that is diagnosis driven.

PROS:

Early Years partners are able to:

- Connect children and families of the most appropriate local supports
- Provide some short-term early intervention where appropriate
- Facilitate NDIS access and develop an NDIS plan for participants
- Offer a ‘no wrong door’ approach
- Build pathways to supports around the context and capacity of the child and the family
- Utilise functional evidenced based assessments and developmental screening tools

CONS:

- The execution of assessment of eligibility requires further consideration. NDIA's decision against utilising existing providers to avoid a conflict of interest may have resulted in partners with no background or expertise in early intervention.
- The use of these assessments requires a practitioner with competent exposure to early intervention, but it is our understanding that this requirement is not always being met, resulting in the poor execution of eligibility assessments
- Victoria and NSW have a different approach to the ECEI pathway, with Victoria securing Early Years Partners in each roll out area, and NSW continuing to fund current ECIS providers to support new and existing participants on the ECEI pathway until full scheme roll out in 2018, upon which tendering for Early Years Partners will commence.

Recommendation: It is our recommendation that there is a nationally consistent approach, where current providers assist with transitioning new customers in consultation with the ECEI Early Years partner. We also recommend that key safeguards are out in place, similar to those provided for Support Coordination, where there is a transparent offering of all options to potential customers.

Service needs of NDIS participants receiving support under the ECEI pathway

Service Needs of Participants receiving support under the ECEI Pathway	ECEI pathway as delivered by NDIA / Early Years Access Partners - Victoria Do they meet the service needs of participants?	ECEI services delivered by registered NDIS service providers - Victoria Do they meet the service needs of participants?
Services need to be easily accessible and locally based.	ECEI Early Years Access Partners (EYAP) either established or to be established in the local area. Committed to delivering services based on family preference e.g. in home. As EYAP are either not experienced ECEI service providers (Brotherhood of St Lawrence) or current providers in the allocated areas, they have limited current knowledge of local referral/service support points e.g. medical practitioners, MCH, Early Childhood education and care services.	Limited choice of registered ECEI providers in rural areas. Service delivery in the community (including in home and at child care) is restricted by the cap on travel charges per NDIS package.
Best practice shows services are most effective when delivered in natural settings.		Approach reflects best practice as identified by the ECIA national guidelines and is committed to deliver based on the recommended guidelines, in home or community. The natural environment provides the best opportunities for learning, helps children apply and use the skills they learn in the right setting and in unrehearsed conditions (rather than try to generalise across different settings), and places emphasis on the importance of collaborating with parents to explore and enhance the naturally occurring learning opportunities that are present in day-to-day life.
Services need to be timely and responsive, and research suggests early support and intervention results in better outcomes for children and increased capacity for families to support a child's ongoing development.	The ongoing capacity to respond in a timely way is unknown, as EYAP is currently being established in Vic roll out areas. EYAP capacity to transition defined participants will require an adequate and skilled workforce, and there is difficulty with EYAP recruitment, particularly in rural areas. Concern regarding new NDIS eligible participants and continuity of supports when transitioning from EYAP to selected NDIS service provider as requires retelling story, building rapport and trust. In some cases participants have waited 12 months from being identified to commencement of planning with NDIA,	There is an adequate and skilled workforce willing and able to provide services to eligible participants in a timely and responsive manner, in line with best practice guidelines. There is limited community-based generic services to refer non-eligible NDIS children to.



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	with no access to state funded service during this wait time. In some roll out areas there is limited feedback for referrers regarding the outcomes of referrals.	
Services need to be experienced and skilled in family centered and social model of early childhood intervention, tailored to individual needs and be strengths based.	VIC EYAP - early childhood intervention experience varies from experienced ECIS providers (Merri), providers with a medical approach to intervention (Link), to providers with limited early childhood intervention experience (Brotherhood of St Lawrence). VIC EYAP who are not currently direct providers in areas of responsibility will require time to understand the local sector and establish necessary networks.	There are NDIS registered service providers with staff experienced and skilled in family centered and social models of early childhood intervention, tailored to individual needs and be strengths based.
Support for families and carers to access information, emotional and peer-to-peer support	Will the EYAP have capacity for counselling? Potential to duplicate state funded services such as VIC Strengthening Parent Support Program. Early roll out customers are missing out on the ECEI approach and are going straight to a plan with limited information or support.	Potential for increased referral to State funded carer and parent support services which are limited particularly in rural area, and have no opportunity to increase capacity without additional funds.
Participant choice	No choice of EYAP in Vic for participants.	In most metropolitan areas there are sufficient services providers to allow participant choice, but there are thin markets in many regional areas.
Inclusion support	Focus on inclusion with little mention of participation or how services will be delivered in the context of the universal service system (e.g. partnerships connections)	The social model of service delivered in the natural environment promotes inclusion.
Outcome measures that are meaningful for families and children	A lack of reference to outcome measurements in the ECEI framework. Outcome measures are important to ensure proper continuity and relevant supports The Pedi – cat is a robust tool for assessment of function but is inadequate as an evaluation tool to measure progress and goal attainment.	A lack of reference to outcome measurements in the ECEI framework. Outcome measures are important to ensure proper continuity and relevant supports The Pedi – cat is a robust tool for assessment of function but is inadequate as an evaluation tool to measure progress and goal attainment.



Timeframe in receiving services under the ECEI pathway

A quarantined waiting list from VIC ECIS services has meant that some families have waited 12 months since being identified to the commencement of planning with the NDIA, with no access to state-funded ECIS services during this wait time.

We anticipate long timeframes for the transition of defined participants as it is our understanding that partners are required to commence planning for defined participants and assess/process new referrals, while staff are yet to complete their training and have limited knowledge in the sector/local area.

We commend the NDIA identify the inadequacies of fast tracking first plans, as the commitment to a more robust planning process enables greater family consultation and participation.

Recommendation: Consider utilising current service providers to support a streamlined transition for defined participants.

Adequacy of funding for services under the ECEI pathway

Funding needs to be adequate to ensure access to reasonable and necessary supports that reflect the individual child and family's local community. Our experience and modelling shows that funding is insufficient to provide service in the natural environment that is consistent with best practise guidelines.

Costs associated with ECEI services, including costs in relation to initial diagnosis and testing for potential ECEI participants

Currently, access to testing and diagnosis can be difficult, with long wait lists for public health services, for example regional Autism Spectrum Assessment Teams. Access to the health system can be costly as gaps payments through Medicare are limited, and access to specialists, medical diagnosis and testing is costly and unaffordable for many families.

Recommendation: NDIA subcontract organisations to facilitate the fast tracking of diagnosis and testing for the purposes of establishing ECEI participant's eligibility for access to ongoing NDIS supports. (eg. DET model for assessment for eligibility for school supports)

Evidence of the effectiveness of the ECEI Approach

As per the NDIS quarterly reporting dashboard for December 2016 and March 2017, the outcome domains are robust measurements and reflect the intentions of the ECEI approach and evidence. A decrease in the outcome domains for children 0 to school age could be an indication of difficulties identified in the transition process, due to the late establishment of the early year's partners in the roll out areas thus far.

A measure of effectiveness should NOT be the number of children diverted to state based services.

Robustness of the data required to identify and deliver services to participants under the ECEI

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We encourage the NDIA to finalise the Outcome Measurement Framework and develop a consistent reporting framework for providers regarding participant goal attainment against the identified domains to enhance effectiveness.

Adequacy of information for potential ECEI participants and other stakeholders

Information from the NDIS/ Early Years Partners changes, often without notice, resulting in confusion about how processes work and directly impacting on engagement in services. (e.g. referrals slow down, necessary supports are missing in plans and more reviews are sought) There can be minimal engagement between stakeholders and early years access partners, leading to confusion about referral processes, for example paediatricians referring directly to service providers.

There seems to be inconsistency in the communication of eligibility to stakeholders. One early years access partner states on their referral form, that eligibility to receive ECEI services is ‘a disability or a developmental delay which is the result of an impairment and causes substantial functional limitations, and requires a coordinated, long term, multidisciplinary service response.’ This would indicate that the example of “Jason” from the NDIS website would not be eligible as he does not require coordinated, long term, multidisciplinary supports. This could result in families self-selecting as not being eligible to take up the ECEI referral option.

Early Years partners are struggling to engage families in these early stages, and this could be as a result of engagement strategies not being tailored to family needs, for example offering group workshops without child care, or short time frames to organise focus groups.

Accessibility of the ECEI Approach, including in rural and remote areas

The use of interpreters supports access for those from CALD backgrounds, however there is extremely limited inclusion of interpreting in NDIS plans. Based on feedback from parents, there is also limited use of interpreters when setting up plans together, and this is occurring in metropolitan as well as rural and remote areas.

Because the establishment of partners in the Victorian roll out is in its infancy, it is difficult to quantify and comment on their adequacy in terms of accessibility, however early communication from the partners demonstrates a commitment to a place-based, family-centred approach in the local area. Partners are indicating that they will meet with families where ever families feel most comfortable, whether that be in the home, kindergarten or other requested location, and offer supports in the child’s key environment.

The principle of choice of ECEI providers

There is no choice in Early Years Access Partners, with one partner contracted and designated for each region, and we feel that this contradicts the NDIA principal of choice and control. There is a need for a robust quality and safeguarding framework that ensures families have access to a diverse range of providers delivering best practice.



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We appreciate the opportunity to make a submission to the committee's inquiry into the implementation, performance and governance of the NDIS, and will continue to work in partnership with all stakeholders to provide the best possible support for people with a disability, their families and carers.

