



Submission to Commonwealth Parliamentary Joint Standing Committee on the NDIS

NDIS Planning

Support Independent Living

**General issues around the implementation and performance of the
NDIS**

6 September 2019

Dr Sherene Devanesen
Chief Executive
Yooralla

BACKGROUND

Yooralla is a large disability services provider in Victoria that has been supporting people with disability for 101 years. Currently, it delivers a comprehensive range of services from 100 locations in metropolitan, regional and rural Victoria.

Yooralla's vision

A world where people with disability are equal citizens.

Services

The range of services includes –

Community services

- Assistance with daily living
- Support coordination
- Day services – 16 locations, including a learning hub
- Recreation services
- Volunteer coordination
- Intake service
- Duke of Edinburgh Award

Residential Services

- Residential accommodation (SIL) – 60 houses, including the only Ventilator Assisted Support Service in the country
- Short term accommodation (respite)

Allied Services / Wellbeing

- Physiotherapy
- Psychology
- OT
- Speech
- Nursing
- Teaching
- Independent Living Centre and access to National Equipment database
- Communication Technology services
- Behaviour Support team
- Autism spectrum Disorder Assessment and Diagnosis clinic
- Behaviour support
- Therapy

Supported employment

Delivered through business enterprises located in one metropolitan and three regional centres. Employment opportunities are provided in the areas of:

- Small goods manufacturing

- Packaging
- Catering
- Garden maintenance

Children's services

- Early Childhood Intervention Services
- Kindergarten inclusion service

Research – Agenda to 2020

- Aboriginal and Torres Strait Islander engagement in disability services
- Understanding the health issues/health needs of people with intellectual disability
- Psychological wellbeing of families and carers

Staff

2,000 fit-for-purpose staff

Governance

The organisation is governed by a strong and professional Board.

Transition to the NDIS

- Yooralla's therapists participated in the Geelong trial
- Since 1 July 2016, Yooralla has been transitioning participants to the NDIS
- Yooralla has transitioned 3,000 participants to the NDIS
- 96% of Yooralla's customers chose to remain with Yooralla
- Several new participants have chosen Yooralla to provide their supports

Relationship with the NDIA

Yooralla has a productive and collaborative relationship with the NDIA; personnel at the NDIA have been receptive to Yooralla's feedback and have used their best endeavours to address emerging issues, resulting in the delivery of positive outcomes for participants. It is Yooralla's perception that while there is an understanding of what is required and a strong desire to respond, positively, that there could be a resource issue within the NDIA that prevents it from being more timely in its actions.

It is in this context that Yooralla will address the terms of reference of the inquiry.

1. NDIS PLANNING

Based on the feedback received from participants, Yooralla's observations regarding the planning process is as follows:

- Although improving, the **timeframes for developing and approving plans**, both initial and subsequent, **are prolonged**; with providers often continuing to provide services in the absence of the plan.
- Owing to a **knowledge gap, planners** are not always capable of providing the best assistance to participants.
 - For example, planners appear to be unaware of the distinction between the key worker model and line item therapy for Early Childhood Intervention. In addition, there is variability in the outcome of the planning process depending on the experience of the planner.
- It is suggested that the ongoing training and professional development of planners includes the embedding of planners within provider organisations for short periods of time.
 - Yooralla experienced the benefit of NDIA making the time to learn about a service. For example, Yooralla is the sole provider of a ventilator assisted support service, requiring planners to understand and address very complex needs. Following a visit to the service by NDIA personnel, the complex needs of these participants are now being met.
- Currently, providers are not given **notification of a plan review** leading; the ensuing termination of service bookings prevents the ability to claim for services and causes rejections.
 - Ideally, six weeks' advance notice should be given to minimise these risks.
- **Plan reviews** should not be required for:
 - Assistive technology equipment prescriptions; and
 - Home modifications

Instead, amendments could be made to the existing plan.

- It is suggested that there is a review in the methodology for the allocation of funds, so claims, prior to the plan review date, can be processed.
- Participants are unaware of the **plan implementation process**; this should be explained at the planning meeting.
- In order to deliver goal focussed supports, visibility of the plan (currently not available) would be advantageous for providers to be able to deliver goal focussed supports.

2. SUPPORTED INDEPENDENT LIVING

With reference to the process for access to SIL:

- While Yooralla has seen an improvement in the time taken for the NDIS to approve **SIL quotes**, there are still **significant delays**.
- **Vacancy management** is a major issue for providers as there are fixed costs associated with supporting participants in a residence; yet, the income is less than what is required where there is a vacancy.
- With regard to vacancy management; a suggestion would be to temporarily increase the packages of the remaining residents (participants) such that the supports can still be provided without the provider incurring a loss; should there be a decision that the vacancy remains permanent (in order to better support the remaining residents), then a permanent increase in the packages of the other residents would be required.
- There is no visibility of the demand for SIL services; previously, state government departments held a waiting list, which facilitated the placement of participants in residential settings. An ability to better gauge the demand, by location, would assist in filling vacancies.
- There is a significant delay in getting SDA approval; thus slowing down the ability of SIL providers to support participants.
- As previously indicated, Yooralla provides the only available ventilator assisted accommodation support service and owing to the complex needs of the participants, supports are provided by Disability Support Workers who are assisted, trained and supervised by nurses. The cost associated with the nursing supports have been classified as **health-related supports**, previously funded by the State Government. Yooralla is aware of the agreement that the health related supports will now be funded by the NDIS and requests that this is facilitated in a timely manner, particularly for the 2019/20 year.

3. GENERAL ISSUES AROUND THE IMPLEMENTATION AND PERFORMANCE OF THE NDIS

Integration of the PRODA portal with providers' systems

- It is pleasing to note that the NDIS is looking at the ability to **integrate the PRODA portal** with providers' systems and Yooralla is keen to assist with this process. However in order to participate in this process, NDIA has proposed extra compliance requirements which include iRAP certification or ISO/IEC 27001 compliance; these additional compliance obligations probably outweigh the benefits that can be realised and it is requested that this obligation be reconsidered.
- Compliance requirements should be proportional to the data already being shared between the provider and the NDIA.

Requirements of the NDIS Quality and Safeguards Commission

- Currently, there is no interface between provider incident reporting systems and the Commission's portal, with reference to the reporting of incidents, complaints, behaviour support plans and restrictive interventions. This results in unnecessary transcription and duplication.
- The portal service levels (9am to 5pm) are not aligned with the 24 hour reporting obligations.

Co-design of systems and processes

- In general, it would benefit all parties if systems and processes being developed by the NDIA are signalled, in advance, and co-designed with providers.

Benchmarking performance

- As the NDIA collects performance data on providers, continuous improvement processes would be enhanced if benchmarked information could be made available to providers.

Payments to providers

- It is Yooralla's experience that while payments made by the NDIA are effected in a timely manner, the same cannot be said of plan managers and self-managed participants.
- It would appear that an increasing number of participants are choosing to either self-manage their packages or to engage plan managers; however, many participants are unaware of the implication of these processes, leading to unacceptable payment delays.
- When providers are unable to receive timely payments from plan managers, providers should be able to seek assistance from the NDIA.

Plan managers

- It is suggested that the NDIA monitors the performance of plan managers and/or requires plan managers to comply with ongoing certification processes.

Self-managed participants

- Yooralla seeks the NDIA's advice on how non-payment by this category of participant should be managed.

Pricing review in relation to recent cost increases

It is suggested that the NDIA consider increasing prices to reflect:

- Payment of superannuation on annual leave loading
- Increased penalty rates for casual staff, and
- The cost impact of portability of long service leave.

4. SUMMARY OF SUGGESTIONS

NDIS Planning

- It is suggested that the ongoing training and professional development of planners includes the embedding of planners within provider organisations for short periods of time.
- Currently, providers are not given notification of a plan review leading; the ensuing termination of service bookings prevents the ability to claim for services and causes rejections.
 - Ideally, six weeks' advance notice should be given to minimise these risks.
- Plan reviews should not be required for:
 - Assistive technology equipment prescriptions; and
 - Home modificationsInstead, amendments could be made to the existing plan.
- It is suggested that there is a review in the methodology for the allocation of funds, so claims, prior to the plan review date, can be processed.
- In order to deliver goal focussed supports, visibility of the plan (currently not available) would be advantageous for providers to be able to deliver goal focussed supports.

Supported Independent Living

- With regard to vacancy management; a suggestion would be to temporarily increase the packages of the remaining residents (participants) such that the supports can still be provided without the provider incurring a loss; should there be a decision that the vacancy remains permanent (in order to better support the remaining residents), then a permanent increase in the packages of the other residents would be required.
- There is no visibility of the demand for SIL services; previously, state government departments held a waiting list, which facilitated the placement of participants in residential settings. An ability to better gauge the demand, by location, would assist in filling vacancies.
- Yooralla is aware of the agreement that the health related supports will now be funded by the NDIS and requests that this is facilitated in a timely manner, particularly for the 2019/20 year.

General issues around the implementation and performance of the NDIS

Integration of the PRODA portal with providers' systems

- Compliance requirements should be proportional to the data already being shared between the provider and the NDIA.

Co-design of systems and processes

- In general, it would benefit all parties if systems and processes being developed by the NDIA are signalled, in advance, and co-designed with providers.

Benchmarking performance

- As the NDIA collects performance data on providers, continuous improvement processes would be enhanced if benchmarked information could be made available to providers.

Plan managers

- It is suggested that the NDIA monitors the performance of plan managers and/or requires plan managers to comply with ongoing certification processes.

Self-managed participants

- Yooralla seeks the NDIA's advice on how non-payment by this category of participant should be managed.

Pricing review in relation to recent cost increases

It is suggested that the NDIA consider increasing prices to reflect:

- Payment of superannuation on annual leave loading
- Increased penalty rates for casual staff, and
- The cost impact of portability of long service leave. ■