



Joint Standing Committee on the NDIS
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1 March 2019

Dear Committee Members,

Supplementary input pursuant to public hearing on the *General issues around the implementation of the NDIS*

Early Childhood Intervention Australia (ECIA) welcomes the opportunity to provide additional feedback to the Committee pursuant to the evidence given on 26 February 2019. Our feedback concerns key discussion points mentioned during the hearing as well as our views regarding the Committee's recommendations as they relate to the Early Childhood Intervention (ECI) sector and the NDIS.

We duly note concerns raised by our Victorian colleagues regarding the roll out of the NDIS and the Early Childhood Early Intervention (ECEI) Approach in densely populated Southern and Western Melbourne, as well as Brimbank Melton which joined the Scheme in the last quarter of 2018. Many of the issues raised reflect systemic issues raised with ECIA on a national level. By way of summary these issues are:

1. Lack of consumer knowledge and support.
2. Trained and supported workforce shortages.
3. Consumer resources to assist families to make good decisions through choice and control in the NDIS.
4. Market failure due to a shift back to a medical model of service and support delivery.
5. Poor interface of NDIS and the ECI sector with broader early childhood and family support services.
6. Limited or no market and provider growth in a consumer directed system, as state and territory services withdraw.
7. Outcomes measurement and value (return on investment) not well understood.

The identified systemic issues are complex and inter-related and impact on a number of service systems funded by the Commonwealth and State and Territory governments. In order to address these systemic and other emerging issues it is of utmost urgency to develop a Blueprint for Early Childhood Intervention through to 2030 informed by key stakeholders within our sector and related sectors. The Blueprint for ECI is to provide the basis for a holistic plan for the development of the ECI sector across key sector concerns outlined above as well as use of technology in ECI, provider and market sustainability, and innovation.

What we support

ECIA supports a recommendation calling on the NDIA and DSS to produce an Implementation Report. The other significant issue discussed on the day was the proposal to fund interim packages for the children on the ECEI pathway. Notwithstanding the delays and teething issues, we believe that it is in the best interest of children and families to have their plan tailored to the family's needs and child's functional developmental goals by a highly skilled and experienced ECI specialists.

Our feedback is restricted to the six topics outlined below dealing with delays in access to ECEI services, gaps in universal services, data about children and the ECI market, ECI workforce, information and guidance for parents and hard-to-reach communities.

Please see below our summary of key recommendations referencing historic recommendations made by the Committee during the three following inquiries:

1. Transitional Arrangements for the NDIS (*Transitional Arrangements*);
2. Market readiness for provision of services under the NDIS (*Market Readiness*);
3. Provision of services under the NDIS ECEI (*ECEI Report*).

1. Delays in access and timely progress through the ECEI Pathway

Given that the most pressing issues mentioned by every organisation present at the hearing dealt with extensive delays on the ECEI Pathway we highlight recommendation 13 of Transitional Arrangements which states that the NDIA should:

“focus all necessary resources and efforts on reducing waiting times at all points of the Scheme, specifically for plan approval, activation and review.”

2. Gaps in services for children age 0-6

Our members have raised significant issues regarding gaps in services between ECI services for children with developmental delay and disability age 0-6 under the NDIS and state & territory government universal early childhood services. We recommend that recommendation 3 of Transitional Arrangements dealing with gaps between state service systems and the NDIS be reworded to include specific mention of universal early childhood services for children 0-6 which may or may not qualify for a NDIS plan.

3. Data about the ECI market and the 0-6 disability & developmental delay population group

It was identified during the hearing that there is a general lack of data on the ECI market under the NDIS, we recommend that recommendation 17 of Market Readiness specify data about the ECI market be released by the NDIA as well as data on the 0-6 disability & developmental delay population group to be led by DSS and ECIA representing the ECI sector. We also note recommendation 1 of the ECEI Report which addressed the publication of an outline of the future model for access arrangements to ECEI Services.

4. ECI Workforce

ECIA suggests pooling together recommendations regarding workforce to be bundled up together which includes a recommendation that DSS develop and publically release a National Strategy to develop the Disability Workforce (recommendation 9 of Market Readiness), as well as funded training for disability workers (recommendation 11 of Market Readiness) including targeted training for all ECEI staff (recommendation 8 of ECEI Report). We also suggest that the recommendation mention a consultation process with the ECI sector due to specific issues regarding ECI workforce.

5. Information and guidance for parents of young parents with disability and developmental delay and NDIS participants

Our members and colleagues at the hearing noted that there is additional systemic gap opening up in the Early Childhood Intervention service system. This gap is concerned with the provision of support and advice to the parents of children with developmental delay and disability age 0-6 *before* entry onto the ECEI Pathway as many families have difficulty accessing high quality advice and information at the start of their journey. This function is currently delivered by service providers and ECIA itself.

We note that the Commonwealth funded the Autism Advisory service through the Helping Children with Autism package to provided tailored information, advice and support on Autism to families. ECIA notes that the revamped Information Linkages and Capacity Building (ILC) program includes a stream name the National Information Program which is described as a service stream which is to ensure that *“people with disability, their families and carers have access to up-to-date, relevant information linking them to supports and services in the community.”* We believe that an Information Service for parents is an essential feature of fully featured ECI service system which should not be subject to a general competitive ILC funding round every three years.

We refer to recommendation 15 which recommends the development of tailored support programs for parents, carers and siblings of children with disability and recommendation 9 of ECEI Report dealing with communication with parents about the ECEI Approach and suggest in keeping with the evidence provided at the hearing by our colleagues that a new recommendation be put forward for an *Independent Information Service* designed specifically for parents of children with developmental delay and disability.

The Information Service is to provide initial support and advice to parents who are new to disability and have little knowledge about disability and developmental delay in children age 0-6, the NDIS and ECEI Approach, as well Best Practice in Early Childhood Intervention.

6. Hard-to-reach communities

We have received significant feedback from our membership about hard-to-reach communities access to the NDIS, most notably vulnerable children and families, Culturally and Linguistically Diverse (CALD) communities and Aboriginal and Torres Strait Islander communities. We recommend that the Committee incorporate a recommendation regarding hard-to-reach communities in its recommendations about ECEI Services and global NDIS issues along the line of previous recommendations outlined below:

- i. assertive outreach services hard-to reach communities (recommendation 20 of Transitional Arrangements);
- ii. provision of support for vulnerable families (recommendation 18 of ECEI Report);
- iii. accessible information on the ECEI Approach for CALD and Aboriginal and Torres Strait Islander communities (recommendation 19 of ECEI Report);
- iv. specific strategy for culturally appropriate services for Aboriginal and Torres Strait Islander communities accessing ECEI services (recommendation 20 of ECEI Report);
- v. that the NDIA urgently publically release its NDIS CALD Strategy.



We look forward to future opportunities to engage with the Committee and welcome your questions.

Sincerely yours

Yvonne Keane

CEO of Early Childhood Intervention Australia