

Uniting Vic.Tas response for Inquiries into NDIS Planning and Supported Independent Living

Recommendations

As outlined in our recent submissions for inquiries into NDIS Planning and Supported Independent Living, we recommend a range of practical recommendations, to improve consumer experiences with NDIS Planning and Supported Independent Living.

NDIS Planning

1. NDIA could **empower consumers through knowledge and engagement**, including by:
 - Developing and promoting more plain English resources to assist participants to navigate the NDIS, prepare for planning meetings and to know their rights. For example, Uniting Vic.Tas have a pre-planning booklet to support participants thinking about their daily living needs prior to their planning meeting.
 - Providing consumers with the opportunity to review and provide feedback on their draft NDIS plan to help pick-up critical errors and empower participants with control over the decisions affecting their lives.
2. NDIA could enhance the **knowledge, skills and capacity of NDIS Planners and Local Area Coordinators** (LACs), including by:
 - Producing a checklist for NDIS Planners to make sure necessary assessments (eg for equipment) are made available after planning meetings to reduce delays in approval and flow-on impacts for accessing existing waitlists for allied health specialists.
 - Allocating NDIS Planners based on skills and previous experience, especially for participants experiencing psychiatric disability.
 - Providing mental health training (eg schizophrenia, bi-polar disorder and depression) to support NDIS Planners and LACs to understand and more effectively plan for:
 - The impacts of mental health and medication on participants and the potential for stresses of planning meetings and review processes to exacerbate mental illness
 - The changing mental health needs of participants and the need for flexible supports over time (rather than making assumptions about participants needs).
3. NDIA could **improve communication by NDIS Planners and LACs**, including by:
 - Improving communication pathways for participants to contact NDIS Planners especially when preparing for critical planning meetings so that participants understand their rights (eg being able to have the planning meeting in their home, with a support worker or family present, at a time that suits them).
 - Ensuring LACs adopt a rights-based and person-centred approach to planning meetings.
 - Enhancing communication between participants, planners and support services when changes happen, especially when support hours in participant plans are reduced for unknown reasons or when further documentation or assessments are needed.
 - More timely communication to services about billing changes when a participant changes from NDIA to 'plan managed', to ensure payments are effectively processed.
4. NDIA could improve availability of services outside metropolitan areas to ensure that participants in **rural and regional areas have equitable access** and choice of services.
5. NDIA could improve **timeliness and support during the appeals process**, including by:

- Promoting participant awareness of the appeal process, especially for participants with mental health conditions who may not be aware of the appeals process if they lose mental health supports after their first plan.
 - Improving supports available to participants during the lengthy appeal process.
 - Funding services to provide support to participants through the appeal process.
6. NDIA could ensure that NDIS **plan review processes do not commence too early**, as this can reduce future support allocated to participants in the next plan because participants are unable to fully utilise funds to capacity in the shortened time period.

Supported Independent Living

7. NDIA could improve **timeliness of Specialist Disability Accommodation (SDA) approvals** and Supported Independent Living (SIL) approvals to reduce gaps in support for participants, improve quality of life for those waiting for equipment and support financial viability of disability services. This could occur through:
- Better communication between NDIA and SIL providers regarding SIL quotes approvals and additional questions and materials needed to support SIL approvals.
 - Enhanced communication within the NDIA between the area that receive the SIL quote submission and the NDIA planners.
8. NDIA could **resolve SIL funding issues** to improve financial stability and viability of SIL service providers, thereby maximising choice and accessibility for consumers, including by:
- Improving clarity and stability of the process for claiming above the benchmark set by the NDIA.
 - Viewing SIL for each home as a whole, rather than as individualised plans (eg synchronising plans at each house so they expire at the same time of year).
 - Reducing delays with the NDIA approving SIL quotes and subsequent delays in NDIA payment to ensure financial sustainability especially for smaller providers who may not have the financial reserves to buffer long payment delays.
9. The sector holistically needs to address practical, financial and industrial challenges associated with **SIL workforce shortages and roster management** that can meet the needs of residents across multiple locations.
10. NDIA could **implement better vacancy management strategies** to support the financial sustainability of SIL providers and ensure access, choice and control by NDIS participants, especially in thin markets (such as in rural and regional areas).
11. NDIA could improve the **current delays in SDA eligibility approvals** which delays for NDIS participants in being able to move into SIL, including by:
- 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 other key care plan information (eg 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.
12. NDIA could provide **interim funding for vacancy management** to help compensate SIL providers for the financial impacts of having a bed vacant, to ensure vacancies do not diminish the financial viability of NDIS providers.

Responses to Questions on Notice

1. Advice on the interface between early learning services and NDIS services to better support early diagnosis for children with disabilities

State capacity building programs for kindergartens

In Victoria, the State Government provides a number of services to support children with disabilities access kindergartens. As outlined in more detail at Attachment 1, these include:

- Kindergarten Inclusion Support (KIS): KIS aims to provide services for enhancing children's engagement in a program, rather than specifically working with a child in a one-on-one capacity. KIS criteria for eligibility includes meeting disability criteria.
- Preschool Field Officers (PSFO) Program: The PSFO Program provides referral pathways into specialists such as paediatricians, speech therapists, occupational therapists and other allied health professionals who provide assessments for NDIS eligibility. However, PSFOs do not replace therapists or specialists.

These state funded programs aim to build capacity in early childhood settings. The NDIS, by comparison, aims to support individual skills and development of children participating in the scheme. For this reason, we suggest that these programs remain separate.

The Inclusion Support Program (ISP) is funded by the Australian Government to provide support to long day care services while the state-funded KIS program provides support to the state funded kindergarten program. Hence in a long day care setting, a child can access KIS during kindergarten program and ISP outside of kindergarten program. Both KIS and ISP provide support to this group and not a one-on-one with the child.

Gaps in the transition to the NDIS

Early Childhood Intervention Services (ECIS) previously supported children with a disability or developmental delay from birth to school entry and their families. ECIS provided special education, therapy, counselling, information and parent education, service planning and coordination, and support to access services such as kindergarten and child care. However, funding for Victorian early childhood intervention services is transitioning to the NDIS.

In Victoria, children with a disability or developmental delay who do not meet the residency criteria of the NDIS can access to Continuity of Support (COS) Program funded by the Victorian Department of Education and Training to overcome this barrier. The COS Program has been strongly welcomed by the disability sector in Victoria. Without this program, these children who have previously accessed ECIS will be left without support under NDIS.

Families not accessing NDIS supports in kindergarten settings

A significant issue with the NDIS that our early learning staff identify relates to families with children participating in the NDIS not electing to have therapy sessions and support provided by their NDIS plan in kindergarten settings. This could relate to either:

- Parents not being aware that they can choose to have this support in their child's NDIS plan
- NDIS Planners not being aware or promoting this support to families when developing the NDIS plan.

This impacts the capacity for educators in early learning settings, as educators receive less support for children with a disability if families do not ask for this service in their child's NDIS Plan. To improve NDIS support in early learning, Uniting suggests that there needs to be:

- Better education for families to help them to make decisions about supports available for their children in kindergartens (e.g. involving the teacher to incorporate strategies that the therapist is currently working on with the child into the kindergarten setting);
- More promotion of these services within kindergarten settings; and
- Additional training and education for NDIS Planners to promote inclusion of these services in NDIS Plans.

Support is available for funded kindergartens to plan and implement a program that is responsive to the individual abilities, interests and needs of children with a disability, developmental delay or complex medical needs.

2. Clarification on NDIS services accessed during the review period

- Uniting Vic Tas advises that services can be accessed during the review period. However, when NDIS plans expire there have been delays in getting the new plans approved. In Uniting's experience, NDIA changed the process and would not approve new plans until the SIL quote was also approved. This has resulted in gaps in plan dates and some of the services provided in the plan could not be accessed or be continued until the SIL quote had been negotiated and approved.
- Even once Uniting have come to an agreement with the NDIA and have been told the SIL quote has been approved, we have witnessed that there have been delays as to when the NDIS Plan is then received by the participants to recommence services.
- NDIA would like the SIL quotes to be submitted 6-10 weeks before a NDIS Plan review so Uniting are able to negotiate this all before the NDIS Plan is up for expiry. However, when Uniting SIL services are still having to resubmit and renegotiate (and follow up if there has been no communication on the outstanding service bookings) on the NDIA's previous SIL quotes, and still have not received all the revenue for the previous period, this timeframe is unattainable. This issue is particularly critical if the SIL provider is not made aware of an early plan review.

Attachment 1: State capacity building programs

Kindergarten Inclusion Support Program

The Kindergarten Inclusion Support Program (KIS) is designed to contribute to the delivery of quality kindergarten programs in line with the National Quality Framework and the Victorian Early Years Learning and Development Framework. The support from KIS programs is in addition to the existing resources available to the kindergarten staff and may not fully cover all costs.

The KIS program:

- Provides assistance to complement early childhood teacher knowledge and skills, while acknowledging their expertise in supporting children's learning and development
- Supports early childhood teachers to build their capacity to develop and implement an inclusive program
- Supports early childhood teachers to contribute to positive outcomes for children, as defined in the Victorian Early Years Learning and Development Framework
- Responds to the child's abilities and strengths, as well as their needs by supporting the kindergarten to enhance their learning and development.

Inclusive programs encourage and allow all children genuine opportunities to access and participate in kindergarten programs. Types of KIS Programs include short term assistance support; disability; and complex medical needs.

Extra assistance from the KIS disability and complex medical needs programs may include:

- Specialist training and consultancy for early childhood educators to meet the individual needs of a child with a disability and high support needs or complex medical needs. This may include reasonable adjustments and modifications of the kindergarten program.
- Minor building modifications such as ramps and grip rails to support the child's attendance and participation
- Additional staffing support. KIS funded additional assistants work as part of the team delivering the kindergarten program to all children in the group. They should not work exclusively with the child identified in the KIS application. They also cannot be used to increase staff levels to meet licensing requirements.

Preschool Field Officer Program

Victorian state funded kindergarten programs are eligible for preschool field officer (PSFO) services to support the access and participation of children with additional needs in their kindergarten program PSFOs use a locally responsive approach that includes consultative support, resourcing and practical advice to assist kindergarten teachers. PSFOs also assist kindergartens to link families into supports and services available for children with developmental concerns and broader child and family supports.

The Department of Education and Training funds community service organisations and local councils to provide PSFO services across the state. There is no cost to the kindergarten program or families for the PSFO service.

Children covered under PSFO program

The PSFO program defines children with additional needs as children in a funded kindergarten program presenting with developmental concerns. These developmental concerns may be associated with any area of a children's development, from language delay or challenging behaviours through to multiple disabilities.

Children must be attending or about to start a funded kindergarten program for the kindergarten to receive PSFO support. Children getting Early Start kindergarten funding who are attending a kindergarten program delivered by a degree-qualified early childhood educator may also qualify for PSFO support.

The PSFO role

The PSFO works closely with the early childhood educator, not one on one with individual children. PSFOs can enhance the capacity and confidence of the early childhood educator to provide an inclusive program that is responsive to the needs of all children.

Support for educators may include:

- Providing information and resources to inform inclusive programs
- Supporting educators to assess a child's learning and development needs
- Supporting educators' confidence and capacity to respond to a parent's concerns regarding their child's development
- Providing planning support that respects, acknowledges and complements the educator's expertise in supporting children's learning and development
- Coaching to help with planning and implementation of inclusive kindergarten programs
- Building professional partnerships and collaborative relationships with kindergarten educators
- Modelling of specific skills, suggestions and strategies with educators
- Assistance to embed child specific teaching and learning approaches and opportunities into the everyday kindergarten environment
- Identifying referral pathways and linking families to child and family supports, including more specialised assessment and services where necessary.