

**Submission
No 103**

INQUIRY INTO POST SCHOOL DISABILITY PROGRAMS

Organisation: Action for People with Disability Inc

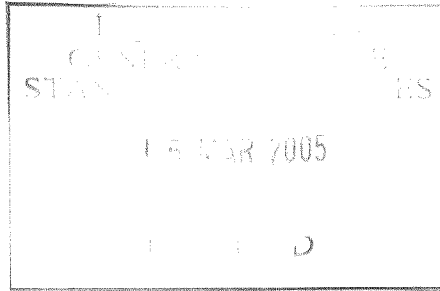
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Subject:

Summary



Action for People with Disability Inc.

**Submission to the Legislative Council Inquiry
conducted by the General Purpose
Standing Committee No 2**

into

**Changes to Post School Programs
for Young Adults with Disability**

March 2005

Action's submission is informed by the provision of a high level of individual advocacy and support for people with disability, our support of their families and our continuing broad based and wide consultation with people with disability and their families following the announcement of reforms to post school programs for young people with disability.

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Action for People with Disability Inc

Action for People With Disability Inc (*Action*) is a community based, non-profit organisation which was formed in 1978 to promote and protect the rights, needs and interests of people with disability in the northern metropolitan region of Sydney.

Action believes that people with disability have the same legal, social and human rights as all other citizens in the community, and that these rights become more attainable when people with disability are enabled to live in environments and undertake activities which reflect the positive social roles which are accepted by the community at large.

Action believes that informed and values-based advocacy will help promote and protect these rights. *Action's* philosophy and aims reflect the Principles and Objectives of the Disability Services Act, 1986 (Commonwealth), and the Principles and Applications of the Disability Services Act 1993 (NSW), and elements of various Human Rights Acts.

Action is of the community and works for improved opportunities in the community for people with disability. It is committed to achieving positive change for people with disability locally by prioritising the provision of individual advocacy and support to meet their expressed needs and interests at the local level, and to achieve social change generally by addressing the needs of people with disability on a broader front through systems advocacy and community education and development. *Action* provides support for families of people with disability.

Action's work is based on the following vision:

Action is committed to the belief that people with disability have the same rights as all other citizens and that their physical, emotional, educational, economic and social well-being is best met in environments which:

- Reflect rights rather than privilege
- Aim to include rather than segregate
- Reflect the status of people with disability as valued citizens
- Ensure that people with disability are treated with respect and dignity
- Are the most advantageous for people with disability and do not impose inappropriate restrictions.

ANNOUNCEMENT OF CHANGES

Families were shocked by the Minister's announcement of changes to be made with a total lack of consultation with people with disability and their supporting families, the people upon whom these changes will most impact.

These reforms will result in life-changing decisions having to be made by families and reinforces their beliefs that Government does not value people with disability or the input or role of their supporting families. Families are often the only 'constants' in the lives of their family members and have the greatest commitment to furthering their interests and they have been totally disregarded by this process.

This process as outlined will further disempower people with disability and their families.

ACTION'S PSO/ATLAS REALITY OF SERVICE IN 2005 MEETING

Following the Minister's announcement of these changes, *Action* responded to calls from people with disability and their families to provide an opportunity for them to come together and share information and support.

On 23rd November, 2004 *Action* held a meeting which was well attended with people travelling from other regions to participate.

The meeting heard from families who expressed anger, frustration and contempt of a Government decision imposed upon them yet again.

At this meeting a motion was moved and unanimously accepted to request this inquiry into changes to post school programs for young adults with disability. We are enclosing a copy of the meeting notes for your further information.

PROCESS OF REFORM

Action believes that a timely process of reform of post school programs for young adults with disability is critically needed and makes the following recommendations.

1. The changes stemming from decisions made and actions taken in 2004 need to be suspended whilst a new process is undertaken.
2. The assessment tool, proposed structures, policies and expectation of outcomes need to be developed and then circulated for wide community consultation prior to implementation.
3. A transparent complaints and appeals mechanism be developed and established following full community consultation.
3. Commitment to follow the Community Compact and Consultation Protocol.
4. The Vacancy Matching Scheme needs to be removed.
5. Government to commit a level of resources to bring about true person-centred planning and the resulting changes in services that will be required to implement that planning.
6. Individual 'transportable' funding to be provided at a level which provides 5 days of service as chosen by the person with disability, with transport and other costs being met.
7. Flexible systems of support to allow for changes in goals, lifestyle, interests and family situations of people with disability.
8. Students to be provided with supports to enrol in post secondary or higher education.
9. Consideration to be given to developing innovative practices and flexible services such as those already operating and valued in Australia and overseas.

10. Government and non government sector training.

11. *DADHC* to consult and negotiate with other appropriate State and Commonwealth Departments to achieve positive outcomes for people with disability.

Term of Reference 1

The program structure and policy framework, including eligibility criteria, for the new Transition to Work and Community Participation Programs

POLICY FRAMEWORK

The policy framework and program structure are contradictory: Whilst the objectives and principles of the policy framework are in the main what people with disability and their families agree as acceptable, the structure of the Transition to Work (*TWW*) program and Community Participation Program (*CPP*) is such that these cannot be achieved. The two service models of program structure, in conjunction with the proposed funding levels and assessment procedures, will prove to be inadequate to implement the stated policy aims.

The programs are said to be based on these policy principles as outlined by DADHC:

Commitment to life long learning by ensuring that services provide access to both formal and informal environments to ensure ongoing learning and development for service users whilst recognising the right and necessity of each individual to continue the process of learning for their social, economic and cultural development.

Action's experience is that people with disability are precluded from accessing post secondary and higher education choices due to the lack of transport and other on-campus supports. There are no new initiatives to improve provision of these supports to enable people to pursue further study. People on the *CPP* are not permitted to use their funding for this purpose thereby limiting their learning and employment opportunities for life.

People's future will be determined by a narrowly focused assessment at a young age with no future options to address these lost opportunities.

People in the wider community can choose to pursue post secondary and higher education at any age and whilst also undertaking employment if they wish. Many students leaving secondary study choose to have a 'gap' year before undertaking university studies and their following life experiences often assist them in their choice of

further education. These choices are not available for people accessing these two programs. People will have their higher educational pathways chosen for them when they leave secondary school aged 18 or 19 years, with no recognition of the variance of ages when people are ready for further education.

commitment to social and economic participation

People on the *TTW* program will have limited opportunities for valued economic participation. People on the *CPP* program will not have meaningful programs to provide them with the opportunity of economic participation due to the lack of resources to realise this objective.

People assessed as being eligible for the *CPP* are being allocated very low levels of funding which will not allow them to have long term skill development to pursue future employment opportunities later in life. This lack of funding and flexibility to move between the two programs will resign many people to a life of unemployment.

Planning and implementation of individual quality programs by service providers and full access and participation in the community will not be realised due to the limited and 'block' funding being allocated.

commitment to choice and meaningful and flexible life transitions and pathways

Choice is largely taken from people accessing these programs. The greatest impact on choice is the removal of individual funding to block funding.

The choice of accessing either *TTW* or *CPP* is made by Department of Ageing, Disability and Home Care (*DADHC*) staff following a narrow assessment.

Whilst people can identify their preferred service provider the final decision of choice is made by *DADHC* staff.

Due to the lack of funding for service provision, people's choices of individual programs will be limited to what services can offer within their resources further impacted by the large groups of people they support.

The choices offered will be limited to what choices the service provider decides are appropriate to offer.

The choice of moving between *TTW* and *CPP* will be made by the processes of a Vacancy Management Scheme. Currently, a number of services have had long waiting lists with people not able to access them as their preferred service provider. With the introduction of block funding people do not have the 'portability of funds' or choice of service provider that was previously in place with the allocation of individual funding.

We expect the prioritising of allocation of vacancies will be based on need, as determined by *DADHC*. Those people who wish to move to other areas or those wishing to change services will have to wait to be advised when a vacancy becomes available. If the vacancy is not appropriate or valuable for the person and is refused, they will not be considered again until another vacancy is deemed appropriate for them to access the wait for another appropriate vacancy will be lengthy.

People wanting to change service will be 'competing' for limited vacancies with people who have just left school and those people in permanent supported accommodation who have to leave their residence during the day. This will further disadvantage people living in the family home, and the waiting time for a preferred vacancy will be extensive. We foresee people having to stay in services with options that do not meet their goals, aspirations or needs. Vacancies offered may be a greater distance from the person's residence and already costly transport charges could increase.

If people's current service is very poor they may decide to grasp any other service option offered rather than stay at their service, and this could set up a continuum of service provider change requests.

The lengthy wait for vacancies and the lack of a significant person to request a change of service provider, may result in vulnerable people being left in risky situations for long periods of time.

Service providers will be told who will be accessing their service vacancies and people's individual support needs may impact on the programs being provided and on the

support of the other service providers. Escalation of behaviour support needs for the current and new service participants may again set up a continuum of service provider change requests.

commitment to person-centred planning including recognising and responding to diversity

People have experienced few innovative programs being offered by service providers and the majority of those few that are in place have been devised by families. The lower levels of funding will further restrict innovation and valued programs.

Many families have taken years and considerable resources of their own to achieve person-centred planning and implementation of individual programs. With the reduction of funding these 'hard won' and valued individual service programs will be lost.

Currently services devise individual plans which are not person-centred and are often not implemented due to a lack of resources or commitment to achieve the outcomes as set out in the plan. Service staff determine what is 'achievable' based on their perceptions and resources, rather than the individual person's goals and aspirations.

People's choices are limited to what the service provider can, or is willing to provide and include in the plan. Many families have informed services of what is required in their family member's individual plan only to be told that the services does not see these as appropriate or achievable. Due to the critical need for services, people will often have to accept service provider decisions whilst knowing they are not in their best interests.

Individual choices in a plan of service are also limited by the number of people accessing a service, the individual support needs of all the service users and the resources available.

The goals identified in the plan are often influenced by the outcomes the service wants to attain and at times, their staff training program, rather than the individual goals to achieve individual outcomes which are valued by the person accessing the service.

PROGRAM STRUCTURE

Transition to Work

DADHC's Policy Framework states that the objective of Transition to Work programs is to:

Support pathways to work for people with disabilities who have identified employment as a goal or have been assessed as having the capacity to work. The key target group for these programs will be school leavers entering services however other service users will also have access to this support.

Action's response: The people who identify employment as their goal will not automatically be included in this program. People will only have access to this program when assessed as having the capacity to achieve employment now or in up to two years time. People with disability, as in the wider community, take varying times to be ready for employment, and this flexibility is not allowed within this structure.

We do not believe, given the current structure, that other people will be enabled to also have access to this support.

Program outcomes will focus on service users transitioning into employment and/or employment related services. This may include paid full or part time work, open or supported employment and other employment programs. Service users may also move into vocational education and training learning environments.

Action's response: The current experience of people with disability is that there is a lack of employment places for them in the northern metropolitan region of Sydney. Employment services specifically for people with disability and other agencies continually report their struggle in not only gaining employment for people, but also in maintaining that employment.

Employment in a Business Service (sheltered workshop) is often the only option available for people who would rather not be working in this environment and for very low rates of pay. There are often prohibitive transport costs for people attending these services and coupled with a low level of wages, it is often more financially beneficial for people to remain unemployed. There is a shortage of places even in these services

and people will be forced into the Community Participation Program at the end of two years.

Programs will include pre-vocational skill development and other 'life skill' development as identified through individual assessment and planning processes. Access to industry specific vocational training should complement programs where appropriate.

Action's response: It has proven to be extremely difficult and most times impossible for people with disability to access industry specific training in order to gain employment in their chosen field. Lower levels of funding and 'block' funding provided will preclude individuality and access to this vocational training.

Programs will be provided on a fixed term basis with a formal assessment process undertaken prior to the transition to employment and/or employment services.

Individuals who are identified as not having an immediate or short term employment pathway will move into Community Participation Programs.

Action's response: The two year time frame does not appreciate the differing capacities of people with disability, as experienced by people in the wider community, to achieve outcomes within an arbitrary time frame, which will 'set people up to fail'.

The exiting of people from this program will result in a loss of skills that in most instances will have taken great effort to attain, and also result in fewer hours of service provision.

For people who have achieved the necessary skills but are not able to gain employment in their area due to a lack of vacancies, building access or transport issues, the exiting from this program will be demoralising and the emotional cost will impact on other life areas.

Community Participation Program

DADHC Policy Framework states that the objectives of the Community Participation Programs (CPP) is to:

provide a meaningful pathway for people with disability leaving school who do not have an employment goal or capacity to work in the short term.

Action's response: The policy framework may appear to be sound; however the structuring and funding levels for this program are in direct conflict with the stated aims of the policy. People with a long term goal of employment will be precluded from attaining the required capacities due to a lack of funding for individual skills based programs.

People with a high level of support need and low levels of funding will never realise their full potential with the small amount of service and the lack of individuality and quality programs which would be required to support them in a meaningful manner.

The goal of a person achieving their greatest level of independence and hence a lessened need for this service will not be enabled within this program structure.

CPP also provide meaningful learning opportunities for people with disability who are not engaged in employment or other formal education/training programs.

Action's response: The reality of service provision in the past has been congregate care which does not enable meaningful learning opportunities and the levels of funding provided will ensure that this reality continues.

Services generally have low expectations of and for people with disability and concentrate on their support needs, particularly behaviour support needs rather than the person's capacities and interests. This structure will perpetuate these low expectations.

People in this program will be those with the highest level of support need and most will be supported in large congregate care settings with no opportunities to gain the skills required to be supported in less restrictive environments.

CPP provide services that meet the individual goals, needs and interests of service users based on a person-centered planning approach.

For the small amount of people who will have services that operate in this manner to achieve individual goals, the low level of funding means that most will receive few and/or fewer hours of service per week. We refer to points made in the Policy Framework section of this submission.

For most people the choices they will be afforded will be limited by the amount of funding provided and if any choices are offered these will be few and set by the services. The reality is that at present in some services, the set choices for different activities are that staff determine who will be moved from one room to another. Choices are extremely limited for people with a high level of support need, and these choices are made by some service provider staff to fit in with the service's needs and requirements.

Given the levels of funding being provided, we believe these programs will not comply with the Disability Services Act, 1993 (NSW).

CPP services facilitate community access and participation for service users through the development of effective community partnerships.

Action's response: There has been little demonstration of this outcome in the past and again the low levels of funding will not allow services to pursue this goal. Individual choice of community access and participation will not be affected due to the lack of available funding for service providers.

Formal and informal learning environments are provided for service users.

Action's response: The large groups of people in segregated congregate care will not enable positive learning environments.

Programs are flexible and provide access to other pathways as determined by the individual's life transitions and changing circumstances.

Action's response: The two proposed programs afford even less flexibility than the previous one program structure.

Post School Options (PSO)

When this program for which families and advocates lobbied strongly was established, there was no time limit set for people to have to exit their service, and there was a very real understanding that PSO support would be ongoing. The request at the time was for the WA model to be replicated in NSW. That model allows more flexibility and funding is allocated based on individual need.

1998 school leavers were informed of a two year time limit, however, their funding continued after 2000, and they expected the funding to be ongoing.

People accessing PSO will have to exit the program if they are assessed as 'work ready' even if they do not find employment.

There has been no clear information provided regarding the process for PSO participants who move to employment which is then discontinued for any number of reasons. Will these people be immediately eligible for one of the two proposed programs or will they be left with no support program?

The different funding levels for people on PSO and those on the ATLAS program should never have been put in place. People with the same level of support need and capacities are on greatly varied levels of funding completely determined by the year in which they left school. We know of no other service or support in the community which has levels determined by the year a person left school.

Monitoring of Programs

Given the current and past experience of *DADHC* monitoring we do not believe this will be effectively implemented. There are many *DADHC* funded services which at this time do not comply with the Disability Services Act, 1993 (NSW).

This responsibility will be given to the service providers themselves and will not assist them in the positional change they will have to undertake to achieve the stated policy outcomes desired by *DADHC*. *Action* believes that the lack of monitoring of *ATLAS* and *PSO* programs was one of the determining factors in this restructure.

Term of Reference 2

The adequacy and appropriateness of funding arrangements for the new program.

Action believes that every person accessing these programs has the right to five days a week provision of quality service.

The Minister stated that these reforms will not result in a reduction of support being received each week. Clearly the restructure with the reduced levels of funding will most certainly result in a reduction of hours of support. The restructure will also result in a lowering of the quality of programs that have already proven to have difficulties in meeting community expectations.

The withdrawal of individual funding results in a lack of 'portability' and choice for a person with disability. Families experienced a great sense of achievement when they finally had the need for individualised funding recognised by Government with *PSO* allocations commencing in 1994.

The move to 'block' funding of these programs is recognised as one of the most significant regressive steps taken by Government, and is inconsistent with their stated policies and desired outcomes. It will not support people's individual goals and learning styles.

The allocation of individual funding gave people some leverage in negotiating their services and programs with greater opportunity of achieving their individual goals, and this is now lost. People with a high level of support need will more easily be exited from a service without their individual funding packages.

'Block' funding will not assist services in improving programs and supports as they will still receive the same allocation of funding if a person chooses to leave the service because they are not satisfied with any aspect of the service provision.

Government has not provided a higher level of funding for each participant; rather they have cut funding to reduce their costs of the increasing number of school leavers in future years.

Action believes that the funding allocations are totally inadequate and will not realise the stated aims of this restructure. People will have less equity in accessing services. The lower levels of funding available will result in both a reduction in the quality of services, and a reduction in the hours of service provision.

Service providers will be forced to reduce either the individualised aspects of their program delivery, or the hours that they can offer. Given funding levels of \$13,500 per person per annum, it will not be possible to offer both the hours of service and quality of program that people need.

Action has seen that most service providers have not opted to reduce the quality of their services. At a recent ACROD Regional meeting, only one service provider present reported that they could provide five days of care at that level of funding. We hope that this service provision will not result in a large group of people with high support needs being congregated with a lack of person centred programs in a service which does not comply with the Disability Services Act, 1993 (NSW). All other service providers at the meeting reported that they could at best provide 18 hours at that level of funding, depending on the support needs of the person with disability.

It is this issue of reduction of funding that has provoked the most outrage in *Action's* region. We have had continuous communication from families in our region and in other regions across the State informing us of the impact of this restructure on their families and their quality of life.

Families reported that they had sought permission from the Department of Education and Training for their family member to remain at school although their expectation had been that 2004 would be their last year of schooling.

One single parent made this decision when she learned that her son's friend had been provided with a total of only four and a half hours per week service in the *CPP*. As she

is a single mother with two other children, she will be forced to leave her employment if her son cannot access a service five days per week. This mother informed us that she would rather work to support her children and did not want to become “a drain on the taxpayers of this country.” This parent hopes that decisions will be reversed by Government prior to the end of 2005 when her son will have to leave school.

Parents of a person with a very high level of support needs told us of the importance of the small amount of two days of *PSO* that he currently receives. This family wants their family member to have the same opportunities as others in the community, and believe that he has the same right to access five days per week of service as other people with lower support needs have been doing in *PSO* programs.

A large number of families have reported that any reduction in the already low hours of service will mean they will not only have to leave their full time or part time employment but will also have to sell their homes as they will no longer be able to meet their mortgage payments.

Some sole parent families have no network of supports or extended family to assist in supporting their son or daughter with disability.

People have reported a cut in their service from 10 hours a week (one and a half short days) of service to one day of seven hours of service. Other people are being provided with only four to five hours per week of service. These meagre hours of support provide little assistance to families, who provide support for the remainder of the 168 hours per week,

Since the restructure was announced a number of families have been informed by their service provider that where they previously stretched to provide additional hours from other sources of funding, this will no longer occur after 1st April, 2005.

Families who have been rejected time and again for the small respite packages offered in this region know that the hours lost will not be replaced by respite support. One family reported that *DADHC* staff informed her that respite “had been frozen”.

Families who have been provided with 'innovative and flexible' respite packages of \$2,800 per annum know that the approximately three and a half hours per week this provides will not replicate the service hours lost, and their critical need for this additional respite will not be met.

Action has had enquiries from a large number of families regarding applications for permanent supported accommodation for their family member, as they need to continue their employment to support other family members including school age children. These families have reported their difficulties in maintaining their employment with the few hours of service being received, and any reduction means that they will apply for permanent supported accommodation although this will be years before they had intended to do so.

These increased applications for permanent supported accommodation will impact on the parents aged in their seventies and eighties in this region who are still on long waiting lists for provision of this vital service for their middle aged sons and daughters, after providing decades of support and care.

Families have also told us that one parent will change their employment and work 'night shifts' in order for them both to work to sustain their families and make their mortgage payments. Obviously this change will mean a loss of family time and interaction and will result in further stresses on each family member.

Families are currently subsidising exorbitant transport costs to and from the programs. Where a person's service has reduced from two days to one and a half, their transport costs will not reduce. Some families have reported paying up to \$180.00 per week for transport.

The lower levels of funding for people with the highest support need in the *CPP* will mean a reduction in hours for families who are already struggling to provide support for the other days and nights of the week. The decision to reduce hours and quality of program will most impact on families who are totally committed to supporting their family member in their home. Any policy which further 'stretches' these families can only be described as immoral.

The lower level of 'block' funding will not assist services in increasing their ratio of staff to participants.

The 'high needs' pool of \$1.4m across the State is totally inadequate to meet the needs of people with the highest level of support need who have had their hours of service cut. The decision regarding eligibility for this funding will be made by *DADHC* and service providers with no input from people with disability and their supporting families. We are only four weeks from the implementation of the proposed restructure and families have still not been informed of the process of application and allocation of this funding.

The reform of these programs with allocations of reduced funding will not result in the desired cost saving: they will merely result in a cost blow-out in other areas of respite, permanent supported accommodation and in-home services for people with disability and also in costs to community supports and services for other family members.

The inequity in the allocation of varying amounts of funding according to the year a person left school has been of serious concern to families for a number of years. They see this system as discriminatory and want the funding allocated to reflect the level of individual need of each person. People with the same needs and aspirations have greatly varying amounts of funding which results in a great variance of program quality and hours of service.

The announced changes were said to provide a greater level of certainty of funding for people with disability. The reality is that this process has led to a heightened level of uncertainty for people with disability and their supporting families.

Term of Reference 3

The role of advocates both individual and peak groups in the consultation process

We have received reports from the two State peak groups who were involved in the Working Parties formed to consult and advise on the process of reform that they did not agree with the issues of funding and the setting up of two programs. Our understanding is that no other advocacy groups including *Action* were consulted in this process.

There was no wide community consultation as should have occurred to comply with the Consultation Protocol as agreed with the former Department of Ageing and Disability.

The Department's consultation took place with service providers and it has again been clearly seen that Government gives greater consideration to their issues and opinions than it does of the people on whom this restructure will most impact – people with disability and their supporting families.

The reports compiled after three separate and costly reviews of programs for school leavers have never been released and distributed by Government for community consultation.

We understand that senior staff of *DADHC* met with representatives of some advocacy groups after the announcement of the proposed reforms.

If *Action* had been consulted we would have insisted that people with disability and their families be given full opportunity to have input into any discussion of restructure or reform.

Term of Reference 4

The impact of the exclusion of students enrolled or proposing to enrol in post secondary and higher education from eligibility for assistance under the new programs

The exclusion of students enrolled or proposing to enrol in post secondary and higher education from eligibility for assistance under the new programs will limit and in some instances preclude students from attaining their personal goals and realising their full potential for future employment.

Students with a high level of physical disability support need and those students with intellectual disability with the capacity to further their formal studies should be fully supported by the collaboration of the appropriate Government departments to facilitate the required supports.

When these students are not supported to continue their studies, they will have to access post school programs and Government will have to meet this cost. It would be far more beneficial to put this funding support in place to enable people's further study which may lead to a greater level of independence and less need of funded support in the future.

Term of Reference 5

Appropriateness of assessment methodology used to identify school leaver support needs and to stream school leavers into the new programs

The process of assessment was not designed to meet the positive outcomes of the reform as stated by the Minister and *DADHC* staff who made presentations to people with disability and their families in *Action's* region.

The three questionnaires used for the assessments were never designed to assess eligibility for employment and this easily explains why so many errors were made in the determination of people's eligibility for either *TTW* or *CPP*. Families reported that their family member was already involved in employment training and yet were told that they would have to access the *CPP*. Other people who at this time do not have the capacity to pursue employment were directed to access *TTW*.

One family who objected to their assessment outcome was told by *DADHC* staff that there was "no money for reassessments". It was only after considerable effort and stressful negotiations by one parent that a reassessment was agreed to and implemented.

One of these questionnaires in particular focuses on the lack of capacity of people with disability in regard to their 'daily living skills'. None of the forms asked questions about individual plans, interests or aspirations either short term or long term.

We would have expected assessment documentation to have been devised to reflect the positive outcomes as stated by the Minister and *DADHC* staff. We are concerned for those people who may have had an erroneous assessment and are not aware of their right to ask for a reassessment.

We are also concerned for those people with high support needs who were assessed as having moderate support needs. These people will need a 'high' assessment to apply for some of the 'high needs pool' of funding, and without the allocation of some of this funding will have very limited hours of service provision.

We do not believe that these assessments will assist in achieving better service delivery or ensure maximum opportunities for people with disability to enter employment.

PSO participants were informed that regardless of the availability of employment, if they were assessed as 'work ready' they would have to exit their *PSO* program.

Term of Reference 6

The adequacy of complaints and appeals mechanisms established in relation to the implementation of the new programs, and particularly in relation to assessment decisions

We are not able to provide opinion on the adequacy of complaints and appeals mechanisms as this mechanism is not in place.

With four weeks to the implementation of these reforms people with disability and their supporting families have no information about this process and are not aware if *DADHC* will have this mechanism in place prior to 1st April, 2005. This has understandably led to a lack of trust in *DADHC*.

Action believes that *DADHC* must put this mechanism in place immediately and fully inform people with disability and their families of the process of having their complaints addressed effectively and in a timely manner and the process of appeal to be followed regarding decisions stemming from the implementation of the new programs.

The lack of this vital mechanism and process further identifies the absence of valuing of people with disability and their families which has been clearly demonstrated since the changes were first announced.

Term of Reference 7

Whether appropriate and sustainable further education, vocational training and employment outcomes for people with a disability are likely to be achieved as a result of these changes

These changes will:

lessen the current opportunities for people to realise their full potential;

lessen the current opportunities for people to be of, and interdependent in their community;

not provide five days per week of service requirement, let alone the three days a week as stated in the tender benchmark;

provide less than eight hours per week of service for those people with high support needs;

remove vital individual funding;

result in more large congregate care services where people will lose opportunities to attain their individual goals;

lower levels of staff to participants if services meet the three days per week benchmark;

remove choice of service and programs within the service;

remove flexibility;

lead to a loss of skills and reduced funding for those people exited from *TWW* to *CPP*;

have people 'set up to fail' when they are not ready for employment at the end of the two year timeframe of *TTW*;

people accessing a service which is inappropriate or not valued through the Vacancy Management Scheme;

people being more easily exited from services receiving 'block' funding.

Families of people with disability have been dismayed and appalled throughout this reform process. The implementation of these imposed changes with a complete lack of consultation will result in major life changes for many of them and they believe that Government and *DADHC* has scant regard for the negative outcomes they will experience.

Some families will lose or change their employment to address the lost hours of service and some of those with reduced income will lose their mortgaged accommodation and move to private rental accommodation and others will apply for Department of Housing accommodation.

Some families will apply for permanent supported accommodation for their family member and others will request a much higher level of respite allocation with knowledge that this will not be forthcoming.

Many families will not be able to continue to assist their family member to achieve valued lives with positive futures in their community.

Four weeks before the implementation of the changes, people with disability still do not know what service provider they are to access, what transport arrangements will have to be made, have not had their proposed hours of service confirmed. This appalling situation demonstrates a lack of capacity to manage and implement this process, and demonstrates the lack of recognition of the need for people with disability and their families to plan their lives and their lifestyles due to the imposition of these changes.

For families who have to change their employment and/or accommodation or make changes in other life areas, this uncertainty and lack of information is having a major impact on their wellbeing and on family relationships, and they hold Government accountable for this impact.