

**INQUIRY INTO IMPLEMENTATION OF THE NATIONAL
DISABILITY INSURANCE SCHEME AND THE PROVISION
OF DISABILITY SERVICES IN NEW SOUTH WALES**

Organisation: The Mai-Wel Group

Date Received: 8 August 2018

To the Convener

State Government Inquiry – National Disability Insurance Scheme (NDIS)

Submission;

The Mai-Wel Group

Re; Issues and Ongoing Challenges related to the National Disability Insurance Scheme (NDIS) and the Agency responsible for rollout and administration (NDIA)

The content of this correspondence has been carefully prepared with the intent of providing relevant information and tangible evidence of the consistent and numerous issues, blunders and inefficiencies related to the National Disability Insurance Agency (NDIA).

The goal of the Mai-Wel Board and Management and the efforts both within this Submission and via other means and approaches to the NDIA and others, is to achieve a quality National Disability Insurance Scheme that will meet the promise of opportunity and choice.

It is our view that a quality and respectful relationship with the NDIA and Providers, working together, will be a major and essential ingredient if that goal, is to be achieved.

It is the view of the Mai-Wel Board and Management that these examples of issues raised within the Mai-Wel experience, if not addressed and addressed very soon, will continue to have further dire consequences, not the least of those being, market failure.

Since the Scheme commenced in 2013, slowly and surely the actions and inactions of NDIA has had an extreme and negative impact on the original intent and bipartisan agreement of the National Disability Insurance Scheme.

The goal and the promise to people with a disability, their family and /or Carers; was a Scheme offering/promising decision making and choice, choices that would provide opportunities and improve the quality of life of the individual and of the collective lives of the people living with disability across Australia.

About The Mai-Wel Group (Mai-Wel) and why is our Submission Relevant?

- **Attachment 1.0** provides a Snapshot of a strong regional organisation (57 years of operation) with a reputation as a deliverer of quality lifestyle and leisure, accommodation and employment opportunities for people with a disability and youth who are disadvantaged in the job market.
- The NDIS Hunter Launch Site commenced on July 1st 2013, Mai-Wel has been a Registered Provider since then and so, our experience spans the 5 years of the NDIS, 3 years in the Hunter Trial followed by the 2 years of the National rollout We are a multi-faceted provider and we operate in Maitland, Newcastle, Cessnock, Port Stephens and the Lower Hunter.
- The history of experience combined with the 5 years of involvement with the Scheme demonstrates the broad perspective of the current climate related to disability service both in and outside the NDIS funding.

- Mai-Wel is a solution focused organisation with an absolute commitment to the original goal of the NDIS. For 5 years now, our experience with the NDIA is of an ongoing lack of clear and consistent communication, inefficiencies and chaotic behaviours. The results from a financial perspective; our organisation is continuously carrying substantial costs; we have been owed up to \$4 million.
A combination of the systems, inexperience and lack of understanding of disability, on too many occasions the attitude and arrogance of staff, often leaves the participant without an adequate or appropriate Plan and the provider with a massive administrative burden plus the associated costs.
Point to Note; often aside from the matter of staff time spent, if the matter relates to a SIL quote/ a resident's Plan, then Mai-Wel continues to provide their accommodation support and additional support such as community access until the issue is addressed.
Please see examples on page 5.
- Mai-Wel Board and management appreciate and accept that the rollout of a scheme such as the NDIS is a huge challenge. Such recognition was the catalyst for Mai-Wel and many others in the sector committing considerable goodwill (5 years for this organisation) and we remain ready to work together to reach the common goal of the NDIS.
- It is worth noting; that the reason for Mai-Wel's existence is now and has always been to provide quality opportunities for people with a disability. The history, experience and knowledge of the Sector have been largely ignored or rejected by NDIA and sadly at times providers have been accused of raising issues 'out of self-interest' suggesting a conflict of interest.
- As a result the potential of the Scheme, the outcomes for participants and the sustainability of disability sector are all compromised.

The potential for realising the vision is at the least, highly compromised and at the worst; the most disadvantaged participants or potential participants will be left with a **mediocre** system with little opportunity to have their real aspirations or requirements met.

Provider Perspective;

A robust and sustainable Disability Services Sector sufficiently funded is essential;

- to ensure appropriate training to staff
- for supply and maintenance of infrastructure, accessible premises, hoists
- appropriate resources to meet the varied and complex requirements of participants, vehicles, sensory equipment
- and the ability to meet the compliance obligations of the National Quality and Safeguards Framework
- To date, the NDIA action/inactions of the Scheme have actually eroded the financial resources of providers and impacted the ability to remain sustainable.
- The human resources are also greatly and negatively impacted. Example; middle and upper management 'stuck' in 'the NDIA issues' and therefore impacting their 'real' job of overseeing and implementing quality service to participants.

It is a fact that so much of our business costs are directly associated with the lack of appropriate planning and responsiveness.

To explain; aside from the costs of the layers of administration and the complexities of the 'work', requires the skills and decision making ability of more senior staff including; program managers/facilitators, plus in our case, regular intervention of the General Manager of Participant Services and the CFO.

We acknowledge that problem solving is the responsibility of each of those positions, to often however, when the problems are 'solved' by that intervention, sometimes and in the same week, intervention on the same or a similar matter is again required. Example; there is a different planner and/or participant involved (inconsistency/lack of communication). This, sadly, is evidence that 5 years into the Scheme these are no longer isolated issues, rather they have become entrenched and systemic.

- There is little recognition by the NDIA of the impost of administration and consequently funding in no way reflects the costs. Administration will always require funding however the level, issue/impact on providers could go a long way to being resolved if the chaos of the NDIA was addressed.

Market Failure; Underpayment for 1:1, higher support participants is creating a situation where Mai-Wel (and I am also aware of a number of other providers) unless there is financial intervention/increases in the NDIS pricing, will have to make the hard and devastating decision to cease services for this group.

Note; these are the people with the highest and most complex support needs, where the impact on them, their family/carers and the broader community, withdrawal of services would be catastrophic.

Mai-Wel invested \$1.9 million in a quality purpose built centre in Maitland in 2009 and currently support 60 plus of this cohort. The lack of knowledge of the Planners of how and why these participant need to be supported/funded, often results ineffective and unsustainable plans.

The pricing assumptions results in an under-payment of at least \$4 for each hour we provide a service (We know this is issue across the sector and there is already, evidence of providers reducing or withdrawing services).

For Mai-Wel, this is currently a matter of high scrutiny with both Board and management. We have carried the substantial losses for the majority of the 5 years with the hope that the Sectors and Peak Body lobbying, combined with evidence supplied to Pricing Review would address this major issue.

There was some review and rearranging of the pricing however for Mai-Wel that resulted in only a minimal positive impact.

Until the *Definition of 'Complexity'* is established and imbedded in the Price Guide this issue of under payment and the risk of market failure remains.

To Conclude;

- **Attachment 11.** Provides a range of the recent or current examples of the Mai-Wel experience of NDIA.

Mai-Wel is a solution focused organisation and therefore wherever possible, within the Issue List, we have provided Cause and Consequences of the identified issues and a tangible suggestion of how the issue/situation could be improved or addressed permanently.

As previously stated we seek a positive resolution to this current situation of the management of the NDIS.

Be assured that should you require further information or evidence that will clarify or assist we are committed and available to respond.

Yours' sincerely,

Pennie Kearney
Chief Executive Officer
The Mai-Wel Group

Example 1: Mai-Wel has 42 residents and 15 of those had their Plans stalled at the same time. Claims have not been able to be made for the last 6 weeks, combined at \$35,343 per week. Mai-Wel continues to carry the financial burden across that time.

Example 2: The first Plan of a Mai-Wel resident who had been identified as requiring intensive 1:1 support by ADHC, (Continuity of Support) was in dispute for 18 months after a promised review did not occur after 6 months. The result: Mai-Wel continued to provide the necessary support at the 1:1 level (\$7730/ week); however NDIA's failure to review her Plan resulted in a reduction of funding dollars to a 2 share level (\$4626/week). This resident's support needs are complex and impossible to meet in a shared living arrangement. The overall cost to Mai-Wel (at \$3103.00/week) at the end of Year 2 of her Plan was \$161,356. Numerous contacts were made by Mai-Wel to the Agency

SERVICES SNAPSHOT

LIFESTYLE AND LEISURE

The Mai-Wel Group provides social and recreational support to assist people with a disability to increase independence, living and social skills. Mai-Wel's 'Lifestyle and Leisure' activities provide opportunities for participants to meet other people, get out and about in the community, learn new skills and make new friends.

Mai-Wel's Lifestyle and Leisure activities focus on skill development in daily life activities, independent living, travel training, social skills and relationships together with social and recreational hobby and leisure activities for personal development and fulfilment.

In addition to these, the Lifestyle and Leisure business unit also accommodates Creative Arts; all-inclusive arts activities which provide an avenue for self-awareness and creative expression through participation and skills development in music, dance, performance, visual arts and crafts, and Leisure Links; offering people with a disability the opportunity to actively participate within the community, alongside their peers in creative, age appropriate, recreational and leisure activities on the weekend, evening or during holiday periods.

The Hub, Maitland and The Hub, Cessnock, along with The Hill at John Street, Telarah, are each equipped to deliver a variety of lifestyle and leisure activities to match the interests of the individual.

WORKING LIFE

The Mai-Wel Group provides training and support in a variety of areas relating to personal and professional development.

Whether it is community based employment, supported employment in our Supported Employee Enterprise, work experience, training, work like activities, or transitioning from school to the workforce, The Mai-Wel Group is committed to helping individuals reach their full potential.

Mai-Wel's Supported Employee Enterprise, Mai-Wel Enterprises offers people with a disability a range of work tasks in a supported working environment. These include timber product manufacturing, light metal fabrication, confidential document destruction, assembly, sewing, screen printing, document scanning and archiving, to name just a few.

The 'Working Life' business unit integrates Step Up (assisting with school to work transition and work readiness), Get Started (for students in Year 10, 11 and 12 who have a disability and are transitioning from school to working life) and Mai-Wel LabourForce Solutions (MWLFS) for those individuals who are seeking work in the open labour market.

More recently, we have diversified to include Youth in our scope via Transition To Work, an intensive pre-employment support to improve work readiness, helping young people between the ages of 15 and 21 to find employment or to move into further education.

LIVING OPTIONS

The Mai-Wel Group provides a range of outreach and supported accommodation models where support is tailored to the individual's needs and the focus is always on assisting the person to live as independently as possible.

Home is an important part of everyone's life. At Mai-Wel, we understand and support dreams of independence – the need to be independent and to live life the way each individual chooses, without comprising well-being and safety.

Incorporating a range of programs previously referred to as the Urban Living Program (ULP), Independent Living Skills (ILS) and The Outreach Program (TOP), The Mai-Wel Group's 'Living Options' offers progressive accommodation models in residential homes as well as short-term stays, accommodation and tenancy support and community based living support.

BUSINESSES SNAPSHOT

MAI-WEL ENTERPRISES

Timber Manufacturing & Light Metal Fabrication

The timber and light metal fabrication division of The Mai-Wel Group, employs a group of experienced and capable workers to manufacture export quality pallets and crates, a range of metal fabrication products, timber products and furniture, assembly along with various production jobs.

Recycling Solutions

Mai-Wel Enterprises offers environmentally friendly, economical and innovative solutions for local business and industry. Employing a group of highly motivated supported employees, Mai-Wel Enterprises' undertakes confidential document destruction and other innovative tasks as required.

Assembly, Packaging & Business Solutions

Mai-Wel Enterprises provides a diverse range of printing and promotional products, product packaging and assembly, screen printing, industrial sewing, mail out services, promotional bag packaging and electronic document scanning and archiving to businesses and individuals.

MAI-WEL LABOURFORCE SOLUTIONS

Mai-Wel LabourForce Solutions provides specialist employment services that assist people with a disability and youth, to find and keep a job. MWLFS offers end to end recruitment solutions to the business community, helping employers meet their labour needs offering choice, opportunity and participation for all.

CIMSABILITY

Developed in partnership with LiveWare Solutions, CIMSability is The Mai-Wel Group's very own, purpose built, client information management system which is sold and used by many Disability Services throughout Australia.



Parliamentary Inquiry into the implementation of the NDIS and the provision of Disability Services in NSW

Submission Prepared by: Pennie Kearney - CEO and Lucy Crawford - General Manager Participant Services; The Mai-Wel Group

No.	Issue	Cause	Cause	Cause	Consequence	Consequence	Consequence	Consequence	Solution - Proposed or Known
1	Inadequate response time from Planners regarding Plan Build Errors, and the need for Plan Reviews to be carried out to correct errors that occurred.	Poor response time	Plan Error	IT system	Cash Flow-Delayed Payment	Unable to access support	Market failure		adequate response times, services had stopped and/or reduced leading to escalation of mental health and challenging behaviours at home.
2	Inability to claim transport costs from core supports if a Participant is receiving a transport allowance as a periodic payment. This places significant disadvantage on this group of participants. The Transport	NDIA Rule			Unable to access support	Market failure			Establish a Task Force to address the significant issues related to transport. Ensure there is equitable and flexible access to transport funding for all participants who need it.
3	Drain on Support Coordination hours from a participant's plan while the Support Coordinator spends extended periods of time liaising with Planners about Plan Build Errors. This then inhibits the true capacity building supports	Poor response time	Planner knowledge	LAC knowledge	Unable to access support				NDIA commit to reducing response times. Establish a process to ensure 'topic experts' are available to answer questions on particular topics e.g.. SIL, Complex Support, Technical issues, so issues can resolved promptly and
4	Service providers are unable to discuss participant issues with NDIA even when consent document has been completed and provided by the Participant.	Lack of communication	IT system		Financial Loss	Cash Flow-Delayed Payment	Unable to access support	Cease service provision	Upgrade document management system to ensure these documents are not misplaced and are readily accessible by Planners.
5	Poor customer service and response to individual needs by NDIA Staff; Several participants / carers have been told they can only have planning meetings in Newcastle, whilst living over an hour away, much closer to the	NDIA Rule	Planner knowledge	Poor response time	Unable to access support	Participant safety			Identify and respond to individual needs. Train NDIA Staff on how to provide a positive customer experience. Provide clear avenues for participants and/or providers to complain about negative experiences with Planner.
7	Planner unable to identify through conversation with Participant what supports are required to meet complex needs. No consultation with a Service Provider or other professional to inform the planning process.	Lack of training	Planner knowledge	LAC knowledge	Participant safety	Unable to access support	Staff safety	Market failure	Establish a clear definition of complexity as an immediate priority and equip Planners/LAC with the knowledge and resources to make well informed decisions about the type, and levels of support required for participants with
8	Significant reductions in plan budgets for Core Support from one year to the next without any explanation or agreement from Participant and/or Plan Nominee.	NDIA Rule	Planner knowledge	LAC knowledge	Unable to access support	Cash Flow-Delayed Payment	Participant safety	Cease service provision	Establish in NDIA Rules an opportunity for Participant/Plan Nominee to review and agree to the Plan prior to final release. Provide clear explanations for any decrease in budget and allow opportunity for additional
9	Lack of communication with Participant regarding Plan Reviews which are often unscheduled and occur due to a plan build error. This then triggers error messages for the Service Provider when trying to make claims.	Lack of communication	IT system		Cash Flow-Delayed Payment	Financial Loss			Plan Reviews should not take place without the Participant's knowledge. If a participant is receiving services each provider with a current Service Booking should be contacted to advise a review will be taking place on a specified
10	Participants and families do not know who their Local Area Coordinator (LAC) is, the role they play, or how to contact them. It is left to Service Providers to educate participants and put them in contact with their LAC.	Lack of training	LAC knowledge	Lack of communication	Unable to access support	Financial Loss			Conduct an external review on the effectiveness of LAC. Survey and consult with Participants about their experience. Provide information on how complaints can be made about LAC, by Participants and Providers.
12	Many participants living with high medical and/or complex support needs do not have the financial means to cover the costs associated with community access. Their Core Support budget may be used to cover some activity costs	NDIA Rule	Planner knowledge	LAC knowledge	Unable to access support	Participant safety	Market failure		Where a participant has complex and/or high medical support needs, make some provision in the plan budget for resources and activities.
13	Participants are not provided with an actual hard copy of their Plan following a plan extension or review. This leaves the participant unaware of their plan budget and impacts on a Service Providers ability to establish support. The information on the Participant and Provider Portal is insufficient to inform the support establishment, service booking and service agreement processes.	NDIA Rule	IT system	Lack of communication	Unable to access support	Cash Flow-Delayed Payment	Financial Loss		In the new Portal, ensure that Participants and Providers once consent is established, are able to access the entire copy of the NDIA Plan.
14	Funding not reflecting participant goals and their preferred choice of supports.	Lack of training	Planner knowledge	LAC knowledge	Unable to access support				LACS Listening and detailing the goals more thoroughly instead of leaving them so broad. We know funding is based on goals so elaborate in detail on behalf of the participant to assist them in receiving exactly what they require and provide more detailed information so that when the plan is being approved by the planner they get the whole picture.
15	Participants with diagnosed disability being declined NDIS funding	Eligibility Criteria	NDIA Rule		Unable to access support	Participant safety			Can access supports but are being billed directly for these supports. Support for the family upon the application process.
16	Dates on plans not matching the portal, Review dates not corresponding with previous plans resulting in GAP plans, Claiming errors, administrative errors and additional administrative tasks and work over all.	IT system	Plan Error		Cash Flow-Delayed Payment	Financial Loss			Upgrade to an IT System that is fit for purpose.
17	LAC- Regarding new SLES reporting tool- LAC does not have the training to complete the SLES assessments to determine who is /isn't eligible for SLES	Lack of training	LAC knowledge		Unable to access support				Schools should be completing the SLES assessment. Families to be able to access the tool and have the opportunity to discuss the assessment and outcomes
18	Funding Allocations- Participants goal highlights employment- Finding and Keeping a Job is not allocated on the participants plan, most funding clusters are coming from CORE	Planner knowledge	LAC knowledge		Unable to access support	Market failure			Participants goals should be the foundation of planning. Support allocation should directly correspond with goals. Employment should be the first consideration in all plans.
19	LAC- Having personal input into how participants use their funding- for example, a family of a Year 11 student was told that it is the education departments role to provide services and he should not be going to a service provider to access work experience outside of school	Lack of training	LAC knowledge		Unable to access support	Market failure			Better education for LACs. Clarity on roles and actual abilities of all service interfaces.
20	Portal is not reflective of amounts being used compared to what has been allocated. NDIA not taking payments out in time.	IT system			Cash Flow-Delayed Payment				Improve IT system
21	Portal Access- Lack of training and knowledge for families/participants around accessing the portal to obtain NDIS plan. For example, participants who do not have Support Coordination funding, will come to Service Provider for assistance to access their portal.	Lack of training	Lack of communication		Unable to access support	Additional business cost to provider			LACs should have to enter into a Service Agreement with Participants just as other providers do. This agreement should clearly articulate what the LAC will do. This should include provide training on how to access and use the Portal, along with all other areas of an LACs role. The agreement should also outline how often contact with be made with the participant.

22	Participants are not receiving their reviewed Plans until after current plan expires. This may mean that supports are provided that are not actually funded in the new plan. This either means providers are out of pocket for supports provided, or that the supports provided outside of plan must be taken from the newly allocated budget; hence reducing the budget for the next plan period.	IT system	Lack of communication		Cash Flow-Delayed Payment	Financial Loss	Unable to access support		All Plan Reviews should be conducted at least 3 months prior to a plan expiring. This gives sufficient time for plan build, plan handover and negotiation, amendment or approval by participant, plan release and then time for new plans to be sources, discussed and established with Provider.
23	Capacity building supports being allocated to Improved Daily Living cluster at price \$4 less then CORE supports	Pricing	Planner knowledge	NDIA Rule	Unable to access support	Cash Flow-Delayed Payment	Market failure		Conduct an immediate review of this pricing to ensure it is consistent with other Capacity Building Supports and the expectation of skill level and report writing required for a Capacity Building Support
24	Inability to Cancel partial claims via the portal - Claimed / paid for 6hrs, need to cancel 3 hrs, can only cancel full value	IT system			Cash Flow-Delayed Payment	Additional business cost to provider			Improve / Update portal functional to allow partial cancellation of claims
25	Unable to view a complete claim history for a participant	IT system			Cash Flow-Delayed Payment	Additional business cost to provider			Improve / Update portal function to provide a meaningful report function that can be exported out in varying file formats
26	Review of information for participants is very time consuming, filters are restrictive and individual items need to be opened for review one reference number at a time	IT system			Cash Flow-Delayed Payment	Additional business cost to provider			Improve / update data filtering in the claiming system to have wider scope for ranges of information and show information as an overview rather than individual hyperlinks that need to be opened.
27	Participants are allocated Self Managed Plans without the knowledge this is the case. These participants express that they didn't ask to self manage, have no idea what it means, or no desire to do so. It is then left to the Service Provider to assist with plan reviews so other options can be considered. There is no support item to claim from for this support.	Lack of communication	LAC knowledge	Plan Error	Cash Flow-Delayed Payment	Unable to access support	Additional business cost to provider		If a Plan is explained in full before issued to a participant then this issue should be resolved.
28	Participants are allocated Self Managed Plans without the skills level required to do so. There isn't any support provided by NDIA or LACs to develop the skill and it is then left to Service Provider to assist.	NDIA Rule	LAC knowledge	Plan Error	Cash Flow-Delayed Payment	Unable to access support	Additional business cost to provider		There must be a thorough assessment of a person's ability, not just desire to self manage. There should also be some monitoring/review process throughout the plan to determine how successful the self management is, are there any skills that need to be developed, or should the plan be reviewed to move to another plan management option, if the option to self manager wasn't the most appropriate one.
29	Behaviour Support implementation obligations in the NDIA Quality and Safeguards Framework as not funded in any way. There is some provision for claiming by Behaviour Support Practitioners, but the allocated hours are very limited. Some Behaviour Support Practitioners are refusing to take referrals for Participants who have restrictive practises because they do not want to take on the obligations for reporting, submission writing, monitoring etc.	NDIA Rule	Pricing		Financial Loss	Market failure	Cease service provision	Participant safety	Service Providers who are not registered to provide behaviour support but who hold behaviour support implementation obligations must be funded in some way to enable them to meet these obligations. The hours required to provide best practise behaviour support need to be fully realised and included in plans.
30	New SIL quoting tool still not available. Therefore plan reviews require use of previous tool that takes considerable time to complete rather than a review tool if supports needs and information are similar to previous quote.	Lack of communication	IT system	Poor response time	Additional business cost to provider	Market failure			The NDIA must set and notify Service Providers of deadlines for when new systems and processes will be released and be held accountable for meeting these. It is very challenging for Providers to operate efficient businesses when may The Agency who cause the most impact is itself inefficient in communicating and rolling out changes.
31	Notification of acceptance of SIL quote not sent the Service provider requiring Service provider to search in portal each day to check. Notifications in portal do not have easily identifiable information.	Lack of communication	IT system		Additional business cost to provider				There must be a consistent process where Service Providers are formally advised when a SIL Quote is accepted.
32	If a SIL Quote is not accepted by NDIA, there isn't any communication had with the quoting Service Provider as to why, or no opportunity to provide additional information. A Service Booking is just established by NDIA for the amount they agree on, and stumbled upon by chance by the Provider. This then leaves the provider in a position where they have to inform the participant that insufficient funds have been provided and therefore support needs to be reduced, placing everyone at significant risk, or the service has to cease all together, potentially leaving the participant homeless.	Lack of communication	Planner knowledge	NDIA Rule	Cash Flow-Delayed Payment	Financial Loss	Cease service provision	Market failure	There must be a formal process for negotiation/discussion, prior to a Service Booking being established for SIL if the booking is to less than the quoted value. Service providers must be able to opt out of service provision if their quote is not accepted and negotiations are not positive. The NDIA should then communicate their decision and reasons for it with the participant and offered assistance to find an alternate provider.
33	NDIA Planners, regardless of their qualifications, seem to be able to over rule or dismiss reports from professionals such as Occupational Therapists, GPs, Psychiatrist, Psychologists, deeming supports identified throughout those reports as not reasonable and necessary.	NDIA Rule	Planner knowledge		Unable to access support	Cash Flow-Delayed Payment	Cease service provision	Market failure	Reports from professionals should be held in high regard and only over ruled by someone in the NDIA who has a higher qualification level then the person writing the report. If this process is not improved, there is no relevance in participants obtaining reports.
34	Plans for residents have not been sent to their residential resulting in up to 10 weeks delay in knowing a plan has been issued.	NDIA Rule	Planner knowledge		Cash Flow-Delayed Payment		Cease service provision		Plans should be sent to the participants residential address, not to their parents address as the parent could be away on holidays, or not really engaged in the process and fail to advise the SIL Provider of the Plan.

35	<p>There is no crisis or emergency response provided by the NDIA. This is listed in the roles of Support Coordinators but often they are not available or unwilling to assist. There is no 'provider or last resort' yet in place to address this issue, despite it being talked about by the NDIA on several occasions. Often the role of crisis/emergency management falls back to the service provider who the participant has a relationship with at the time. While there may on occasions be funds available to cover this, it is not always the case and Providers are left out of pocket up to several months while a plan review is conducted and additional funds made available.</p>	NDIA Rule	Poor response time	Market Gap	Cash Flow-Delayed Payment	Participant safety	Additional business cost to provider	Funding must be allocated in each plan for crisis/emergency support contingency responses. A 'provider of last resort' must be established as a matter of priority.
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