

Submission
No 252

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

Organisation: Flourish Australia

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**NSW Legislative Council Portfolio Committee No. 2
Health and Community Services**

**Inquiry into the implementation of the National Disability
Insurance Scheme and the provision of disability services
in New South Wales**

Submission by Flourish Australia

9 August 2018



Supporting Mental Health & Wellbeing

Flourish Australia is a community managed organisation that has specialised in supporting people with a mental health issue and psychosocial disability for over 60 years. We deliver supports to close to 5000 people annually, across 60 sites in metropolitan, rural and remote settings. The vast majority of those sites are located in New South Wales.

We have been a registered NDIS Service Provider since 2014 when we commenced participation in the NDIS Hunter trial site.

We welcome this opportunity to participate in the Committee's deliberations and offer the following comments related to the Terms of Reference.

(a) the implementation of the National Disability Insurance Scheme and its success or otherwise in providing choice and control for people with disability

Our experience is that the NDIS has led to an increase in choice and control for people accessing our services. People we support are pursuing the goals they personally identify and the activities they want to, without the boundary challenges of previous funding arrangements.

We witness people achieving the life they seek with the supports made possible by the NDIS, and as directed by them. This has been something people with disability, their families and carers, as well as service providers, have fought for many years and we celebrate those outcomes.

We offer comment below about the funding model and pricing that may impact on support delivery opportunities.

(b) the experience of people with complex care and support needs in developing, enacting and reviewing NDIS plans

NDIS planning processes have been problematic. This has been acknowledged by the NDIA with changes made since the two independent reviews that occurred in 2016-2017. We have welcomed those changes.

Importantly, those reviews identified that the NDIA was not resourced sufficiently to understand the complex support needs of people with a psychosocial disability. The NDIA acknowledged that and has put in place additional resourcing to address that shortcoming. However, it is yet to be seen if that is sufficient.

We are concerned that the resourcing of the NDIA both in terms of numbers of staff (including the staffing cap), as well as their skills and experience, will continue to limit its ability to develop and review plans for people with a psychosocial disability within the National roll-out timetable.

We are also concerned at reports from some participants that funding packages are being dramatically reduced on review. With the scheme and the market still being developed it is unlikely that people are being able to use their funding fully. If decisions are being made based on the proportion of the package that has been used this would be inappropriate.

Also, of note is that in some cases supports that have previously been funded such as employment have been omitted from new plans upon review. Particularly, Finding and Keeping a Job – working in an ADE has been missing, despite the person continuing in supported employment.

(c) the accessibility of early intervention supports for children

We offer no comment.

(d) the effectiveness and impact of privatising government-run disability services

We offer no comment.

(e) the provision of support services, including accommodation services, for people with disability regardless of whether they are eligible or ineligible to participate in the National Disability Insurance Scheme

Flourish Australia strongly supports the National Disability Insurance Scheme. It has provided a much-needed injection of investment into disability services, as well as a better focus on personal choice and control for people with disability, and, in our specific case, psychosocial disability. The services provided under the scheme are more individualised, with increased accountability.

We found the transfer of accommodation services we contracted to manage through NSW FACS – Ageing Disability and Home Care for former Licensed Boarding House residents seamless and positive for people.

We continue to be concerned about continuity of supports for people who are found to be not eligible for the NDIS, though acknowledge recent announcements that funding has been secured from the Commonwealth and States and Territories. Whilst this is a positive development, it is unclear to us whether the quantum is sufficient.

We also have concerns about people with a disability who have no history of accessing government services, who are not eligible for continuity of support arrangements but still need support. We worry that they will fall between the gaps as the NSW Government withdraws from direct support services and the NDIS Rules exclude people from funded plan eligibility.

In addition, boundary issues in relation to psychosocial supports and government provided clinical supports, particularly for people with a psychosocial disability arising from a mental health issue remain unclear. It is

important that people who have a psychosocial disability arising from a mental health issue are able to access both psychosocial and public mental health clinical supports as necessary.

(f) the adequacy of current regulations and oversight mechanisms in relation to disability service providers

The commencement of the new NDIS Quality and Safeguards Commission is a major step forward in simplifying the oversight mechanisms for the NDIS. By overseeing the implementation of the NDIS Quality and Safeguarding Framework it will provide a much clearer mechanism for protecting the safety and rights of people with disability.

The requirement for NDIS Service Providers to be certified against the new NDIS Practice Standards and development of the Code of Conduct are also positive developments.

We believe these mechanisms are appropriate.

(g) workforce issues impacting on the delivery of disability services

Finding people with the appropriate skills to effectively provide high quality supports and services to people with significant psychosocial disability is becoming increasingly challenging to source. Flourish Australia is up to the challenge of upskilling the future workforce to a level where they can effectively work independently with people with significant psychosocial disability. However, consideration of the time it will take to grow and develop the workforce and acknowledgement of the investment required to achieve this objective would be positively received. New people to the workforce require additional training and access to intensive supervision programs, which detracts away from direct NDIS work. To receive positive outcomes for people with complex and significant psychosocial disability, the workforce must be well trained and supervised.

(h) challenges facing disability service providers and their sustainability

Whilst recognising and welcoming the National Disability Insurance Agency's continuing monitoring of the Price Guide and recent enhancements, we remain concerned about the reasonable cost model assumptions and current cap for one on one supports.

The assumptions used in the Reasonable Cost Model do not reflect our experience of what is reasonable in terms of the level at which qualified and experienced staff can be paid under the SCHCADS Award, the productivity levels that can be reasonably achieved by direct support workers and supervisors, or the span of control for managers.

Flourish Australia supports people with significant psychosocial disability arising from a mental health issue. Their lives are often complex, with multiple issues needing to be addressed to support them to sustain

community tenancy and inclusion, and to avoid costly hospitalisation. This requires individualised one on one support by people with significant professional skills, far beyond the “Attendant Care” model suggested in the NDIA’s Reasonable Cost Model.

Following the recent McKinsey review the NDIA committed to exploring an additional payment for more complex supports. We welcome that development but remain concerned that the current hourly rate does not go close to covering the fully allocated costs of providing the much needed one on one supports required. Due to this a number of experienced providers are choosing not to provide these much-needed supports.

In our view this is **the** major challenge in terms of sustainability, and the ability of us, as a NDIS Service Provider, to deliver people with the range of supports they seek.

(i) incidents where inadequate disability supports result in greater strain on other community services, such as justice and health services

We offer no comment.

(j) policies, regulation or oversight mechanisms that could improve the provision and accessibility of disability services across New South Wales

We offer no comment.

(k) any other related matter

We offer no comment.
