

1 Activ Submission: An Ordinary Life at Home

Activ Submission on NDIA Consultation Paper

An Ordinary Life at Home

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Activ Submission: An Ordinary Life at Home

# Introduction

Activ welcomes the opportunity to respond to the National Disability Insurance Scheme (NDIS) Home and Living consultation paper – ‘An Ordinary Life at Home’.

In summary, Activ supports the intent of the paper, however, has grave reservations about processes and systems that are currently in play that have a significant detrimental impact on participants and providers. Of key concern are the slow funding decision making process, reductions in SIL funding and the rate and pace of changes to NDIA requirements.

# Reforming the Funding Model

* 1. *Support for flexibility in funding*

Activ supports the proposed structural change in the Home and Living Consultation paper which removes siloed department decisions which have been detrimental to participants and to providers. Currently Specialist Disability Accommodation (SDA) and Supported Independent Living (SIL) decisions are made in isolation of each other. Activ customers have experienced conflicting decisions between the two which causes confusion, distress and delays in access to accommodation and services.

* 1. *Concerns about slow decision making and poor communication*

In terms of Home and Living funding, the issue that is significantly impacting participants and providers is the length of time for funding decisions to be made and the lack of communication around them. Participants need clarity about their future and providers need to plan their accommodation and service provision.

Currently in Western Australia we are finding that SIL review processes are taking six to nine months to finalise with little to no progress updates. This is contrary to the advice that they should be processed within 42 business days.

For some participants this long delay causes distress and can prevent them accessing the supports they need during that period. For others it can lead to their disengagement from the process and therefore appropriate supports. In some cases, providers are forced to underwrite the service provision during the prolonged review period, which causes financial strain on the organisation.

Additionally, in the case of behavior supports funding, it could increase the risk of restrictive practices being employed, and the safety risks to participants and staff.

For existing customers, Activ is frequently required to underwrite the service cost of participants who are not receiving the appropriate funding to match their existing situation and needs. Activ have found that reviewed plans can be funded at a different ratio to supports currently delivered in their home.

* 1. *Misalignment of funding to needs*

NDIA makes some funding assessments which do not align with a customer’s existing or future circumstances. Plans are funded for 2-3 years and are often not compatible with the current and (known) future funding needs for the period. The process to get these decisions reviewed is lengthy with detrimental impacts to the customer and financial impacts to the provider.

* 1. *Disconnect between NDIS’s stance on group homes and actual funding* Activ’s experience has been that NDIS funding encourages 5 or more participants in a shared home. When customers leave 5 or more bedroom

accommodation, Activ would prefer to leave that home at a 3 to 4 participant maximum, however NDIA will only fund the remaining participants at a 5:1 ratio. This makes the accommodation unviable with reduced numbers. Additionally, that home is underfunded until that vacancy is filled with a participant with an approved plan, which can be a long period of time. Activ must subsidise the remaining residents until then.

* 1. *Inadequate SIL funding*

Like other disability providers, Activ is significantly challenged by reductions in SIL funding, particularly for participants with complex needs. These funding drops come with no explanation and put provider sustainability at risk. Options to reduce costs put participants at risk and there is no specific NDIS contact to query funding reductions with.

* 1. *Concerns regarding funding approvals for changes of circumstances* When a participant’s support needs change for the medium or long term, often for medical concerns, approval for a change of funding is very slow and often doesn’t include backdating of payments. In these circumstances, providers will deliver the required level of support in good faith, but then find that if there are inadequate core supports to draw from, they are not funded.

For example, Activ received written medical advice that a participant with dementia immediately required overnight awake support while the participant was getting up in the middle of the night. Activ put this in place and a change of circumstance was applied for. After five months, the participant no longer required these supports. Repeated attempts and inconclusive enquiries have

been made to recoup the funding (approximately $72k) for the given period. Approximately 18 months later, Activ is still trying to access this funding for services it delivered.

This is another funding element that is threatening the sustainability of providers.

* 1. *Funding issues in regional areas*

Activ faces SIL funding issues in regional areas where the participant base is smaller and the compatibility of participants is more difficult to address. This means that a SIL vacancy may take months to fill which leaves Activ the choice of bearing the cost of the funding shortfall or reducing costs which could put participants at risk.

# Improving Choice and Control through Flexible Budgets

Activ supports the proposal to provide participants more flexibility in the use of their funding.

# Assisting Implementation and Maintenance

* 1. *Support removal of conflict of interests*

Activ supports the approach of removing any opportunity for conflicts of interest in supporting participants. Support Co-ordination is currently provided by some support providers which is in itself a conflict.

* 1. *Concerns regarding planner experience and knowledge*

Activ also has concerns about the experience and knowledge of planners and how that leads to delayed and inappropriate decisions. Anecdotally it has been said that the average tenure for a planner is less than 12 months. Activ suggests that more training and supervision of Support Coordinators could result in a more consistent, stable and reliable service for participants.

Additionally, in regional areas, participants can have phone interviews with planners from all over Australia with little or no knowledge of the region or its capacity to deliver all supports locally. For instance, there may be a need to travel to the metropolitan area to access a dentist. This can result in insufficient funding in regional areas where access to services is limited.

# Engaging the Market and Driving Innovation

* 1. *Current model inhibits innovation*

Activ is keen to drive innovation to ensure people living with disabilities can access the best possible supports and it is encouraging to see this in the NDIS agenda.

SIL supports represent a significant proportion of the NDIA’s committed budget and Activ welcomes the opportunity explore opportunities including;

* + - Short-term, high-intensity supports including Allied Health and other interventions to reduce long-term support needs
    - Exploration of new technologies to reduce face-to-face support requirements, particularly for those living with intellectual disability, as this has typically not been a focus of assistive technology providers
    - “Graduated” or “step-down” transitionary services aimed at easing the transition from 24/7 high-intensity supports to more sustainable models of in-community support.

The current system, however, does not support innovation. Firstly, the NDIA model does not appear to support investment in collaborating with providers to fund innovation in product range and service delivery. Secondly, providers are forced into a reactive stance focused on keeping up with forced changes from NDIA while seeking to ensure delivery of existing services are maintained safely.

# SIL

* 1. *SIL will remain an important support to participants*

The consultation paper has an undercurrent of negativity regarding SIL. Activ believes it is important to accept that SIL is a critical service for the segment of participants who will always require high levels of support. Activ is, however, keen for the NDIA to collaborate with providers to build sustainable and innovative pathways to reducing reliance of SIL.

# Change Management in NDIS

* 1. *Significant cost of change*

The ongoing pace and frequency along with insufficient consultation and lead times for policy and/or process change, has had significant impact on Activ’s cost base, efficiency and productivity.

Most changes have resulted in Activ’s inability to claim funding for the services

delivered. This has required significant organisational resources to address. Lengthy and laborious manual processes have been, and continue to be, required to support capturing the services, recording and back claiming once system redesign is complete. By way of example from July to Oct 20 Activ was unable to claim SIL because material redesign of its core system was required. Activ understands this issue impacted the entire sector. Activ is still addressing the issues caused by Community and Employment pricing changes.

It should be noted that safe guarding of staff and customers is potentially compromised when providers are underwriting unfunded services and are buried in reactive, inefficient process changes.

System vendors and providers are scrambling to make system changes which can support NDIA’s changing requirements. Activ’s experience has been that NDIA doesn’t communicate sufficient process details when providing advance notice of pending changes and therefore system vendors and providers cannot design effectively for change.

NDIA focuses consultation efforts and energies on the end user customer with apparent disregard to the providers who deliver the services and have an extensive knowledge base of customer wants and needs and the practicalities and cost of service delivery.

**If any process or systems changes are required as a result of outcomes from the consultation process, Activ requests that there is significant consultation with providers and their systems vendors before changes to requirements are approved.**