

Feedback on the implementation of Independent Assessment

There are a range of questions the implementation of Independent Assessments raises for our organisation and Community. Key is whether the implementation of Independent Assessments will achieve better outcomes for participants and ensure **choice and control** are maintained?

We believe not and we have major concerns with the implementation of Independent Assessments.

The Hon Stuart Robert MP in introducing the NDIS Plan for the implementation of Independent Assessments on 14 November 2019 said the Government's plan has six core swim lanes:

SWIM LANES	Oonah's questions
1. Quicker access and quality decision making	Does an Independent Assessment process facilitate faster access and better decisions?
2. Increased engagement and collaboration	Is choice and control improved by an Independent Assessment?
3. Market innovation and improved technology	
4. A financially sustainable scheme	
5. Equitable and consistent decisions	Does an Independent Assessment process facilitate more equitable decisions?
6. Improve long term outcomes	How does a participants goals get incorporated into the plan and budget that is developed post the assessment? Will a poorly crafted plan and budget achieve long term outcomes for participants?

For the last 16 months we have been running Yumarrala Ngarrdji an Aboriginal and Torres Strait Islander NDIS Access Project funded by EMPHN. The intent of this project was to increase ATSI participation in the NDIS and build organisational and individual capacity to understand and participate or work within the NDIS.

The overall findings of this project found that Community members required **extensive support** to understand how to **navigate the complexity of NDIS**. Many had no prior knowledge of how NDIS could assist them to build a better life for themselves and their family. Past and present trauma underpins ATSI Community's reluctance to engage with NDIS which Oonah overcame through a foundation of trust and by providing **strong support to walk the journey** with the client whilst navigating NDIS system and working with mainstream services providers.

Whilst we understand the need for standardised decision making **people should be treated as individuals with respect** and each case needs to take into consideration a broad range of issues including specific disabilities, life stage, past trauma and culture. Sadly, our team saw too many clients fall through the gaps after being denied access to the NDIS. We identified some common trends in the clients being denied. Clients suffering with **psychosocial disabilities and cognitive disabilities pain** made up the large majority of individuals being denied NDIS access. We also identified these individuals as being most in need of ongoing support. Our Community is being **failed by a tick box system** where individual circumstances appear to be irrelevant. Inconsistencies

between NDIS staff in terms of knowledge or manner and the breakdown in the flow of information within NDIS makes dealing with the NDIA frustrating and inefficient for both NDIS and clients. The implementation of Independent Assessments raises two concerns in this regard. Firstly we don't believe that NDIA will be able to ensure that the Independent Assessors won't replicate these outcomes for Community. Secondly the **assessment tools chosen do not cover a broad enough spectrum of assessment** to respond to the individual's disabilities and needs and feel more like a framework to continue putting individuals into boxes.

Many members of our Community have **multiple disabilities including psychosocial disabilities**. We are concerned that Occupational Therapists (OT) or Clinical Psychologists (CP) allocated to potential or current participants to undertake Independent Assessments will not have the breadth of knowledge, skills or experience to make valid and comprehensive assessments. Many clients already have diagnoses and assessments from their doctors and medical professionals who they trust, and who are more likely to have **long standing relationship and extensive knowledge of the individual**. These existing and deeper understanding of the individual results in a more comprehensive knowledge and assessment of their disability and how it effects their everyday life and future needs to meet their goals.

Another concern is the time allocated for these assessments which we understand is anticipated to up to 3 hours. Currently when we have an OT do an assessment they take around 10 hours. **Significant time** is required to build trust with Aboriginal people and draw out their story and the impacts their disability have on their life and family. This can be a very stressful experience for Aboriginal people particularly for those who have experienced **significant trauma**. Support is needed both during the assessment and **Social and Emotional Wellbeing counselling** post the assessment.

We also understand that a **draft plan and budget** will flow from the Independent Assessment. Due to the limited time spent with a participant, the narrow range of tools and narrow expertise we are concerned that a comprehensive and individualised plan cannot be developed. We believe a poorly developed plan and budget will not achieve positive outcomes for participants nor improve satisfaction with NDIS.

Many Aboriginal people experience **communication and technology barriers** including lack of access to Wi-Fi, email, a mobile phone with data and reluctance to answer calls with 'no caller ID'. These barriers make it difficult for us to understand how an Independent Assessment can be undertaken via video conference or how this could deliver an accurate and comprehensive assessment of the individual and their disability.

Our work with Community members reinforced the need **for strong cultural interpersonal relationship** with the NDIS and service providers. For instance, the importance of returning to Country or spending time on Country and the inclusion of other **cultural activities are at the core of Aboriginal people's wellbeing**. Oonah worked hard to incorporate cultural elements into client goals by advocating for their inclusion in plans and matching clients with providers who are more culturally aware. Unless Independent Assessors have significant cultural knowledge and training we believe culture and its importance will not be understood nor incorporated into a participant's plan. This is a significant step backwards for our Community.

With the requirement for all potential NDIS participants to undergo an Independent Assessment from the panel we are concerned that this creates a **backlog** and will **increase the time for funding to be allocated**.

In summary we do not support the introduction of Independent Assessments and have significant concerns on how this will impact the Aboriginal and Torres Strait Islander Community on the basis of:

- Reduction of choice and control for participants – a key tenant of NDIS
- Independent Assessments as they are currently designed continue a tick box strategy rather than treating participants as individuals
- Assessors will not have the breadth of knowledge, skills or experience to cover the spectrum of disabilities or understand culture and its importance to healing and wellbeing
- The potential trauma that the Independent Assessment may have on already traumatised or struggling participants
- Time allocated for the assessment will not allow the Assessor to understand the participant's life challenges, undertake a comprehensive assessment nor build an individualised budget or plan. In the end a poorly developed plan and budget will not achieve positive outcomes for participants nor increase acceptance and satisfaction with NDIS
- The tools chosen are too limited to cover the breadth of assessment that needs to be undertaken
- Potential for backlog and delay in allocating funding

We see this implementation as a step backwards and highly recommend the NDIA not proceed with the proposed changes.

Regards
Shirley Hamel
NDIS Access Project Manager