



Mr Martin Hoffman
CEO
National Disability Insurance Scheme
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Via email: martin.hoffman@ndis.gov.au

23 February 2021

Dear Martin

Re: Submission to the Independent assessments consultation

The Young People In Nursing Homes National Alliance does not support the proposed move to the use of Independent Assessments to assess the disability support needs of people and to determine funding levels.

This brief submission highlights the issues raised by the proposed approach for the younger people in residential aged care group (YPIRAC), and addresses these in the context of the recommendations made by Senior Counsel's final submission to the Royal Commission into Aged Care Quality and Safety (ACRC).

The YPIRAC issues has been high on the agenda of the ACRC and was one of three priority areas in its interim report, *Neglect*, in October 2019. A key point made in this report was that the YPIRAC issue is a systemic issue involving multiple portfolios at both levels of government. Its resolution requires deliberate collaboration across these areas of government, including health, housing, aged care, mental health and disability services.

The introduction of Independent Assessments in the manner described, will make it more difficult to introduce the kind of collaboration and co-funding of supports for the YPIRAC group. We make the following points in this regard:

- Doing an assessment to determine funding levels in isolation from joint transition planning with state/territory health and other programs prevents system collaboration.
- The cross-program collaboration that is required is systemic, and the proposed Independent Assessment model assumes that collaboration can be driven by individuals who have little to no knowledge or influence over how government support programs operate, and certainly have no influence to make funding arrangements.

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- The independent assessments are not constructive or developmental for the individual. For those people at risk of RAC entry, this will not assist in the negotiation and design of a transition program that could deliver an alternative
- For a number of people at risk of RAC entry, the experience of disability is new. These people are at the beginning of a long journey of recovery, adjustment and adaptation that is particularly so for those with ABI, SCI and people with progressive neurological conditions. Many different services are required – both informal and formal. Each of these services needs to interact with others and be dynamic to match the recovery of the individual. The process of managing these different services and ensuring that they are relevant and effective is a specialist role that does not currently exist in the NDIS ecosystem.
- The ‘My Plan’ model used by ICARE in NSW for planning and funding supports for people with newly acquired disability is a model that is fit for purpose and relies on collaboration with treating teams and service providers. There are multiple review points that align with the recovery and progress of the individual and funding can be changed to suit circumstances. The ICARE case management model is also superior to support coordination in the NDIS for this group. We recommend the adoption of a similar model for the YPIRAC group utilising the new YPIRAC System Coordinators that were announced in the 2020 Federal Budget.
- A prevailing issue that the independent assessment model does not address is the capacity and willingness of the NDIS to adopt different approaches for different cohorts. As a one size fits all funding model it is highly unsuitable for the YPIRAC group.
- Risk and liability management are at the core of what the NDIS needs to do in running the scheme. However, there are risk management priorities that this approach ignores, such as how to manage system failure in other sectors, and how to achieve co-funding arrangements where it can share risks with other related portfolios.

Finally, the Independent assessment model risks undermining the work of the YPIRAC system Coordinators that are about to be implemented by the Department of Health. This approach was developed in response to the work of the ACRC and is now part of the YPIRAC Strategy, of which the NDIS is a participating commonwealth agency.

I look forward to discussing these matters further with you.

Yours sincerely



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