autism spectrum AUSTRALIA

Building 1, Level 2, 14 Aquatic Drive
Frenchs Forest NSW 2086
PO Box 361, Forestville NSW 2087

22nd February 2021

National Disability Insurance Agency (NDIA) Consultation
Planning policy for personalised budgets and plan flexibility
Autism Spectrum Australia (Aspect)
February 2021

Autism Spectrum Australia (Aspect) welcomes the opportunity to provide a written feedback to the National Disability Insurance Agency (NDIA) on Planning policy for personalised budgets and plan flexibility

Aspect is Australia's leading national autism service provider & knowledge leader. Using the expertise within our own research unit (ARCAP) to identify evidence-informed practices, Aspect provides a broad range of services to support individuals & their families across their life span to achieve outcomes that are important to them by engaging with them in their communities.

These include:

- Regular services in all states & territories (except WA) & a national program of workshops & consultancies known as Aspect Practice, based on the organisation's distinctive capabilities.
- Direct services (both fee-for-service & NDIS funded) for children include diagnosis & assessment, early childhood development, behaviour support & schooling, incorporating nine specialist schools with over 100 satellite classes, education & family support, assessment & transition & educational outreach services.
- Direct services for adults (Aspect Adult Community Services, Aspect Employment) in the form of preparation for employment & community based services.
- A national resource for families & services seeking information & advice about people on the autism spectrum.

The organisation employs more than 1000 staff, many of whom are highly skilled professionals who are experts in the field of autism, including clinical psychologists, specialist teachers, speech pathologists, occupational therapists & adult services staff.

We have provided feedback that have the most relevance to our expertise, work and services.

1. How should a participant's plan be set out so it's easier to understand? How can we make it easy for participants to understand how their funding can be spent?

Plans should be short documents that are structured in a way that makes it easy for participants and their support networks to find the key information that they will need when engaging with service providers. For example they need to be able to easily locate their NDIS number, their personal goals, and personalised budget, with flexible and fixed supports clearly evident. They also need to clearly see how their plan is managed, as we know this is often a point of confusion for families. Plans should be free of jargon and written in Easy English and pitched at a level that the participant and their support network can understand. As participants will no longer have funds allocated to particular support budgets, they may not be aware of what types of support they can engage with. There will need to be clear and simple information included in the plan, with practical examples provided, which matches their goals to support options. This should accurately reflect what has been discussed in the planning meeting, demonstrating informed decision making of the participant and their support network. If a participant has funding allocated to a fixed budget, it should be clear what this can be used for a personalised to the participant's goals. For example if it's allocated for Assistive Technology, then the item required should be identified in the plan.

2. **How can we support participants to prepare for a planning meeting? What might be needed to support participant decision-making?**

Existing participants and their support networks should be made aware of the change in process and what will look similar/different to the current process. Providing practical examples and information in a variety of formats will be essential to support the participant's ability to comprehend the changes.
Due to the proposed changes, all participants need to be made aware that they will receive a draft plan and budget ahead of their planning meeting. We would like to know the timing of receiving the draft plan and budget in relation to their planning meeting as participants will need sufficient time to process what has been sent to them and may want to engage with people in their support network ahead of their meeting. The agency should be aware that this could cause anxiety for many participants and their support networks and they may arrive at a planning meeting confused or upset/angry with the budget allocated to them. Participants and their support networks should have the opportunity to speak with someone about their budget ahead of their planning meeting if they have concerns or should at least know who to contact if they not yet received the draft.

Participants will need to know that they can still take a support person to the planning meeting. They should also be informed that they can bring reports/letters/information provided by existing supports and health professionals that can support decisions around what supports have been/haven't been working for the participant. They will need time to request and have these ready for their planning meeting.
To ensure participants and their support networks feel confident in implementing their plan, it is essential that the NDIS delegates involved in these meetings:

- Have skills and expertise in the disability sector
- Understand the suite of supports available to participants and can clearly link these to their functional needs and goals so that participants and their support networks can make informed decisions
- Understand and can clearly and simply articulate what are reasonable and necessary supports and how they link to their level of funding
- Have knowledge in evidence informed services so they can make appropriate suggestions of the types of supports that would support their goals
- Be able to make sound judgement on the ability of participants and their families to self-manage funds. Whilst flexible budgets are a positive thing, we cannot ignore the fact that it will increase the complexity of managing where funds are spent. There may be multiple services drawing from one big bucket of funds so participants need to be on top of what's being spent with whom.

Participants and their support networks should know who they can contact after a planning meeting if they have any other follow up questions.

3. **Which supports should always be in the fixed budget? What principles should apply in determining when supports should be included in the fixed budget?**

We agree with the examples provided by the agency including:

- Specialist Disability Accommodation
- High Cost Assistive Tech or modifications
- All Improved Relationships funding (behaviour support)

4. **How can we assure participants that their plan budgets are at the right level? (e.g. panels of the Independent Advisory Council that meet every six-months to review learnings and suggest improvements)**

It is important to recognise that a one size approach never works in the disability sector and whilst two individuals may present similarly on assessment results and receive the same plan budgets, their journey, level of improvement and ongoing functional needs may look very different across a plan period. This is based on a multitude of complex factors, which we are concerned may be overlooked through the Independent Assessment and planning process. It will therefore be very difficult for the agency to assure the participants that their plan is at the right level based on an Independent Assessment. Instead it will be essential for the agency to collaborate with participants and their support networks to ensure their allocated budgets are meeting their functional needs and supporting goal attainment. Some key considerations would be:

- Has the participant been able to meet their goals? If not why?
- To provide regular check in's where the participant and their support network can provide feedback on their budget allocation.
- During the 12 month review meeting with participants and their support networks, gather consistent data from each participant so that it can be reviewed for any patterns and potentially inform changes.
- Independent reviews completed regularly

5. **What new tools and resources should we provide to support people using their plan and new plan flexibilities?**
    - Transparent information around how their assessment results equate to their allocated budget
    - Simple video explaining the key differences in the planning process
    - Providing examples of what the plans will look like, with prompts included to show where they can finds the info they need
    - Clear and concrete examples of what types of supports can be accessed under a flexible budget that relate to the participant's goals
    - More written and visual case studies (videos) that reflect the diverse range of participants accessing the scheme
    - Improved information around how a participant's plan can be managed and the expectations for each option. We find this one of the most confusing parts of the planning process for many of our participants
    - Much stronger risk assessments around which participants can self-manage their plans due to the changes in budget allocation and availability to funding within plan periods.
    - A who to contact cheat sheet, so that participants know exactly who to go to if they have questions

6. **What do we need to consider for children aged 7 and above in the new planning process?**

There needs to be a smooth transition process from Early Childhood Supports into the full scheme, given the differences between the two age ranges. Will this now occur at 9 years of age?
The most important consideration apart from those already mentioned in this report, is that the participant's voice and their support network voice is evident throughout the planning process. Whilst the plan is a stock standard document, the process to create that plan is what matters most. Participants should not be seen as a number from their assessment results and equivalent plan budget, but rather it is their goals, quality of life and participation in meaningful activities, that are most important.

Careful consideration of crucial milestones and transition points should be mapped out for individual participants in the planning process to ensure they receive adequate levels of support as their needs shift and change.

7. **What ideas do you have for how people can use their plan more innovatively?**

It is essential that participants understand the basics of their plan first and can seek and engage in appropriate supports to meet their needs. Participants should be looking for value for money supports and options that allow them to best utilise their funding with optimal outcomes across plan periods with knowledgeable and skilled providers.

8. **How best to handle the timing of the release of funds into plans and rollover of un-used funds?**

There needs to be very clear guidelines around the release of funds so that consistent decisions are made across delegates. Sound decisions also need to be made following the completion of risk assessments to ensure that participants can manage their funds for the allocated period. It needs to be made very clear to participants and their support networks how much funds will be released each month/quarter so they can plan ahead with their chosen service providers and avoid overspending in the funding periods.

As suggested in the consultation paper, there needs to be some flexibility around how funds are released into a plan as a participant's needs and access to services may change throughout a 12 month plan period. For example if a participant wishes to engage in a more intensive period of support, they may need increased funds in a certain month than in others. This needs to be discussed with participants in the planning meeting so they are aware of their options and know how to request this. Will there be a cap on the additional amount they can apply for to be released?

Considering all this, the release of funds could provide some challenges for service providers and has prompted the following questions:

- Can services only submit a claim for services delivered in a given month from that month's funding allocation? If so what happens if a participant overspends in a given month? How will services be paid?
- Will services be able to make service bookings for a 12 month plan period or will they need to create new service bookings each month? If it's the latter, that will create a significant increase in additional administration work for services

Unspent funds should roll over into the remaining months, as participants may not be able to access appropriate supports or may be sitting on long waiting lists. As this is reflective of challenges in the sector, participants should not miss out on using unspent funds. Plans should be monitored regularly for unspent funds and delegates should check in with participants to discuss why they are not utilising their allocated budget.

9. **How should check-ins be undertaken? Under what circumstances is a check-in needed? Who should be involved in a check-in?**

As mentioned in a previous question, all participants and their support networks, should be able to request a check in at any stage if they have questions regarding their plan and budget. There should also be regular check in times agreed on with the participant during their planning meeting – see comments in the question below. How a check in occurs should meet the participant's individual needs and this should be agreed upon in the planning meeting. For example some participants may prefer a face to face meeting, a zoom call, a phone call, an email or a text message. Regular communication and check-ins should be completed by the delegate who developed the plan. Participants should be made aware that they can involve a support person in the check in.

10. **How often should we check-in with participants in different circumstances?**

Check ins should be based on a participant's individual needs and additional check ins should be scheduled if they are deemed a vulnerable participant. There should be a minimum expectation regarding the number of checkins all participants are offered e.g. bi-annually or quarterly. As discussed in the consultation paper, increased check ins should be offered at crucial transition times or to participants who may need more due to their current situation.

11. How can the NDIS ensure positive relationships between participants and planners?

Communication is crucial. NDIS planners should be available to participants when they have questions or concerns. They should provide clear and transparent information around the process and expectations. Planners also need to take time to get to know participants, to build rapport and gain the trust of participants. Planners should be checking in with participants to further build the relationships with them and their support networks and to ensure the plan is meeting their needs.

The NDIS needs to ensure they employ experienced and skilled planners who listen to participants and their support networks. The must work within a person centred framework, where they are putting the participant at the centre of the planning process. They must be able to work within the capacity of the participant and be able to identify when someone may need additional support during the planning process.

There needs to be clear pathways for participants when they have feedback regarding the planning process. Participants should be kept informed of the outcomes of their feedback and offered solutions if things are not working for them.

12. How can we best support participants to transition to this new planning model?

- Allow for a longer trial and transition period to ensure all processes, guidelines and resources are available. This will allow for participants and their support networks who have experienced the process to provide valuable feedback on what the strengths and challenges were and will inform the NDIS of crucial changes that need to be made.
- Seek further input from participants on what will support them to transition to this new planning model. What is it that they feel they need?
- Work with service providers to ensure they have a strong understanding of what the process will look like, so in turn they can support the participants they already work with.
- Continue to provide clear and transparent communication to participants, their support networks and service providers and listen to their feedback.
- Provide multiple opportunities for participants, their support networks and service providers to receive updates on the new process. For example through online forums, face to face workshops/meetings, online content, paper based content etc.
- Consider all of the above recommendations already made in this response.

Yours faithfully

Rachel Kerslake
National Director, Individual & Community Services
Email: rkerslake@autismspectrum.org.au

Sarah Crook
Regional Manager Northern Region, Aspect Therapy
Email: scrook@autismspectrum.org.au