

# **My Plan Manager / Response: Planning Policy for Personalised Budgets and Plan Flexibility Consultation Paper**

**17 FEBRUARY 2021**

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### About My Plan Manager

My Plan Manager is the leading plan manager and largest service provider for the National Disability Insurance Scheme (NDIS).

We recognise and value the key role we play in helping participants achieve their social and economic outcomes, increasing their ability to live an ordinary life and achieve their goals and aspirations. For us, this means helping participants to have access to the widest choice of NDIS providers that best suit their needs, with control over their budget and finances. We constantly strive to be an organisation that not only positively influences our clients' lives, but also strongly advocates for societal change for the wider disability community.

Since our beginning, My Plan Manager has invested significantly in technology and improvements in the way we do things, so participants can exercise more choice and control in the purchasing of the right services to achieve their goals. Critically, we do this whilst protecting and managing an individuals' vulnerability and risk by ensuring appropriate safeguards are in place.

We believe, My Plan Manager will continue to have an important role in the success of the NDIS.

### Executive Summary

My Plan Manager welcomes the opportunity to respond to the NDIS Consultation Paper: Planning Policy for Personalised Budgets and Plan Flexibility.

My Plan Manager is uniquely positioned to see the risks and the opportunities relating to the intended reform pathways set out in the Consultation paper. My Plan Manager recognises the National Disability Insurance Agency (NDIA) wishes to reset aspects of the Scheme and, in doing so reconstruct existing legislated provisions in key areas as "Reasonable and Necessary services and supports". My Plan Manager also recognises the post Tune review proposed legislative changes are aligned to proposed changes to matters currently within the Agency's delegated powers, such as plan flexibility and resetting the NDIS Price Guide architecture.

It is within this context that we have taken the opportunity to explore and provide informed feedback on a range of interdependent potential factors which we strongly believe need to be taken into consideration and factored into both the decision-making process and, importantly, the transition period for any changes, to best achieve the Objects of the NDIS Act.

#### *NDIS Planning Policy and model*

We agree allowing a plan to be amended, in appropriate circumstances, will be an effective lever to improve participant experience and drive better overall outcomes. In addition, options to use plan funding more flexibly as participant circumstances change, is better aligned with the NDIS, and enables participants to exercise greater choice and control.

My Plan Manager strongly advocates for the establishment of a consistent process to determine Scheme eligibility and a funding baseline whilst ensuring existing participants who remain eligible for

the Scheme are not disadvantaged and can maintain continuity of supports during the transition period (e.g. having regard to the “no disadvantage principles” previously adopted by the NDIA).

More specifically, My Plan Manager proposes the level of funding arising from the completion of an independent assessment should be the base level or starting point, with a conversation then held with the participant as to what additional supports are required to assist the participant to incrementally achieve their goals in line with the Principles and Objects set out in the NDIS Act.

This approach would enable the advancement of a hybrid Maslow- hierarchal “model” in which there is an “evidence based minimum guarantee safety net, applied consistently to all participants and, importantly, a progressive approach to individualised planning and the investment of additional funds to support the individual’s goals and aspirations in line with the longitudinal principles of insurance-based thinking. The approach would allow the delegate to ensure other environmental and/or safeguarding matters unique to the individual and their circumstances can be reflected in the flexible funding allocations.

From a cultural perspective and having regard for the need to build positive and sustainable relationships with participants such a model would also transition the role of NDIA delegates to “partners” as opposed to “gatekeepers” of funding.

#### *Plan flexibility, ‘fixed’ and ‘flexible’ items, and participant vulnerability*

My Plan Manager agrees that plan flexibility is an important component of the future planning approach. However, in designing the model for plan budgets, My Plan Manager believes there should be three “buckets” established, as follows:

1. Items requiring ‘one-off’ funding
2. Non-flexible individualised support items that are specified, pre-determined and allocated
3. Flexible funding

Further detail for this rationale is outlined below.

My Plan Manager agrees that supports specifically identified, e.g., one-off fixed items, for example a complex home modification should be ‘fixed’ in a participant’s budget.

However, My Plan Manager strongly believes that certain costs, that are ongoing and not one-off costs should be specified, pre-determined and then allocated as “new” funds into the fixed budget or ring-fenced under the understanding they cannot be “trade-offs” for other service and supports. This would ‘ring fence’ certain funding to overcome a situation where needed supports are competing with other flexible funding items.

A child’s therapy might be one example, as would Support Co-ordination or expenses required to effectively manage a participant’s plan. Each of these items is about capacity building for the participant and assigning this in the creation of the budget will eliminate any potential need for ‘trade-off’ decisions to be made.

Further, we see ongoing challenges existing to participant safety, in particular vulnerable participants who do not get sufficient support for making informed decisions. Therefore, for each participant we

recommend the NDIA delegate (and assessor) not only consider vulnerability in a present in-situ context, but also the risk of potential future vulnerabilities.

As a result, My Plan Manager strongly advocates that each participant's own existing and potentially future vulnerabilities are risk assessed, with additional funding over and above what might have been determined from the independent assessment assigned as an additionally funded "ring-fenced" and non-flexible stated item in each participant's budget. This can then be varied, as the delegate works in partnership with the participant and their key people and other agencies over time.

As plan managers, we see an important role for us in the management of participant vulnerabilities.

The approach outlined is consistent with the Objects of the NDIS Act, the *NDIS (Supports for Participants) Rules 2013* and specifically section 14.2 of the NDIA Planning Operational Guideline – Approving the statement of participant supports, which requires, when "deciding whether or not to approve a participant's statement of support, the NDIA must also assess risks and safeguards in relation to the participant (rule 4.1(d) of the *Becoming a Participant Rules*)."

#### *Plan management fees*

Section 43 of the NDIS Act provides a participant with the right to request how they want their plan to be managed, e.g., self-managed or plan managed. This forms part of a participant's choice and control and participants have demonstrated their need and desire for this support with over 40% of participants choosing to utilise the services of a plan manager. Plan management has been one of the important success stories of the NDIS and we believe plan management fees should not be part of the 'flexible' budget but rather part of the non-flexible individualised supports "bucket", so these funds are not competing with other items in the plan. This would effectively 'ring fence' these fees and ensure a level of stability for participants during a period of significant change in the scheme

#### *Participant check-ins*

My Plan Manager believes participants are ordinarily best placed to know when they need further assistance, or navigating and accessing supports, however the undertaking of check-ins with participants at key intervals in their life cycle and during their plan is a good 'safety net' to ensure the welfare of the participant and validate that everything is 'on track'.

It will be important that the triggers for conducting check-ins are focussed on those positive items, like "how can I help to access needed services" rather than those just affecting plan funding, otherwise there is a risk that they will become regarded as 'check-ups' rather than proactive and genuine 'check-ins'. Should the participant's plan be focussed on achieving goals and the reaching of key milestones, then the likelihood is that check-in conversations will lead to a positive experience and one that is solution orientated.

We would welcome the opportunity of discussing this further with NDIA representatives.

#### *Impact of services provided to participants by Plan Managers*

As evidenced by our growth and the level of plan management in the NDIS, participants see us as a trusted, valued, and independent partner in the effective and efficient utilisation of their plan funding.

We recognise the significant backdrop of change will create sector confusion and concerns for participants around their current level of supports and the impact to them. Working in partnership with the NDIA we can help participants prepare for and successfully navigate these changes, with the primary objective of supporting them access the right services for their individual needs and goals.

Whilst consultation with Plan Managers has occurred as a by-product of the broader sector consultation on the implementation of independent assessments and the introduction of personalised budgets and plan flexibility, to date, there has been no direct consultation with plan managers on how these changes will impact the services they provide directly to participants.

My Plan Manager would welcome the opportunity to work with the NDIA and other relevant parties to discuss and plan for how to best implement the proposed changes to minimise the impact to participants, so the changes do not significantly disrupt the services provided by plan managers to over 40% of scheme participants.

Specifically, the introduction of personalised plan budgets and plan flexibility for existing participants will be a major change for participants and, as currently set out in the consultation paper, will require plan managers to operate two 'systems' and processes during the transition period (i.e. maintenance of the existing processes and implementation of new and more flexible budget management rules for participants who have had funds determined after an independent assessment).

It is unclear, at this point, how long this will occur for and how quickly the NDIA expects plan managers to make the required changes. Clearly and importantly, there will be a cost impact for plan managers in making these changes.

In summary, our responses to each of the consultation questions is outlined in the following pages.

We look forward to the opportunity of discussing our views further with the NDIA as they work with participants and the broader disability sector to shape the future design of the NDIS.

Ms Jane Kittel  
Chief Executive Officer  
My Plan Manager

17 February 2021

## Responses

### 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?

The participant's plan needs to be clear, concise and outline who are the primary decision-makers and key contacts. The plan should also be set out in plain English and consider the use of other techniques, e.g., pictures and tables to display information to make it easier for the participant to read and understand.

Where a participant nominates to utilise a parent, nominee or intermediary, the development of the plan should involve them and then detail their role and responsibilities.

The plan should also clearly state what funding has been assigned, including the duration of the funding and its purpose. Where there are 'fixed' and "ring fenced additional support items, these should be specifically referenced including the amount allocated.

In addition, the following should also be specified either in the plan or as an attachment to the plan in an appropriate mode of communication:

- The timing for the release of funding, e.g., annual, or quarterly
- The processes for managing any over or under spending
- How funding can be moved from fixed to flexible allocations and vice versa
- Who to speak to when assistance is required
- The processes for seeking a variation of the plan and the funding assigned
- The review rights for reviewing a plan
- Check ins (rationale) and processes, as well as obligations
- Triggers and preparation for independent assessments and the potential outcomes of an independent assessment.

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

Firstly, new, and existing participants have different needs.

An existing participant will have already experienced a planning meeting and to help facilitate a timely planning meeting the participant should be asked to consider prior to the planning meeting, "what's working/not working", "what's changed" and "what might be needed to achieve their goals over the next planning period". In addition, should the existing participant currently utilise the services of a support person or intermediary, they should be able to maintain their involvement and include them in the planning meeting or seek information from them to use at the planning meeting (as needed).

A significant change for existing participants, however, will be the link between a plan review and an "independent assessment". We have set out our recommendations in relation to the independent assessment process for existing clients in our response to the "access and eligibility" consultation paper. This includes reference to pre-meeting sessions and the re-introduction of the "no disadvantage principle" for participants who remain eligible for the Scheme.

With new participants, there is an important opportunity to ensure that their first interaction with the NDIS post the independent assessment phase is a positive one and as a result they should be able to seek the advice of an intermediary in preparation for and as part of holding their first planning meeting. My Plan Manager sees this as part of our value add service offering and an important way to minimise any confusion or uncertainty, particularly through the transition to the new planning process.

Having available on the NDIA website tools like a flowchart on “preparing for a planning meeting” after the independent assessment would be beneficial and help both prospective and existing participants, as would a flow chart on helping participants understand how they can spend their money and on what types of supports. In addition, clarity on the role and powers of the NDIA delegate is needed.

It will also be important for participants to understand at their planning meeting how the outcome of the independent assessment has informed their plan budget, and how the proposed budget determined will “assist” them to “pursue the goals, objectives and aspirations included in the participant’s statement of goals and aspirations” as specified in section 34(1)(a) of the NDIS Act.

### **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?**

My Plan Manager strongly advocates that the proposed level of funding arising from the completion of an independent assessment should be the base level or starting point of funding, with the conversation then with the participant focussed on what additional supports are required to fulfil their goals within the period of the plan. An example could be funding to manage a participant’s own vulnerabilities.

My Plan Manager agrees that supports specifically identified, e.g., one-off capital items like Specialist Disability Accommodation, complex home modifications etc are items that should be ‘fixed’ in a participant’s annual budget. Further, we support and agree that plan flexibility is an important component of the future planning approach.

However, My Plan Manager strongly believes that certain investments, that are ongoing and not one-off investments in capital should be specified, pre-determined and then allocated as additional supports in the budget as annual “non-flexible” supports or otherwise “ring-fenced” additional supports. This would ‘ring fence’ certain funding to overcome a situation where needed supports are not competing for other ‘flexible’ funding items and where any subsequent dilution of funding from a specified purpose may negatively impact.

We propose that the following criteria be adopted to determine the funding that would be ‘ring fenced’:

- (a) existing levels of vulnerability.
- (b) potential future levels of vulnerability.
- (c) levels of future dependency.

(d) access to mainstream services (as provisioned in the UN Convention on the Rights of Persons with Disabilities (e.g., housing, health services, transport, education etc) and which again align with the insurance-based principles of the Act).

(e) the capacity of the individual to navigate the complexities and payment integrity arrangements of the NDIS; and

(f) fees to exercise a participant's choice and control for how their plan is to be managed.

It is important that access to such insurance-based investments are not subject to "rationing" based on short-term "necessities". For example, parents should not be placed in the position where investment in therapy supports for their child is compromised because assigned funding has been utilised on more "immediate" supports (e.g., short-term accommodation).

Also, in cases where a participant is assessed as having a more severe disability (either cognitive or physical), higher vulnerability and associated risk, there is a responsibility to provide funding and access to items like support coordination where it may not be initially requested by a participant.

As set out above, in relation to vulnerabilities, My Plan Manager strongly advocates that each participant's own vulnerabilities are risk assessed, with additional funding over and above what might have been determined from the independent assessment assigned as a 'set' item in each participant's budget. This assessment should include a wider review in line with the Objects and Principles of the Act in respect of a participant's capacity and level of supports to access mainstream services as provisioned in the UN Convention on the Rights of Persons with Disabilities (e.g., housing, health services, transport, education etc).

This later approach outlined is consistent with the Objects of the NDIS Act, the *NDIS (Supports for Participants) Rules 2013* and section 14.2 of the NDIA Planning Operational Guideline – Approving the statement of participant supports, which requires, when "deciding whether or not to approve a participant's statement of support, the NDIA must also assess risks and safeguards in relation to the participant (rule 4.1(d) of the *Becoming a Participant Rules*)."

We also believe that both Support Coordination and Plan Management costs, which are enabling activities directly linked to a participant's capacity building, should be assigned as set amounts, so those amounts are not competing with other areas set out in the 'flexible' part of the participant's budget.

This revised approach My Plan Manager has described, is consistent with a true person-centred pathway, better aligned with the Objects and Principles of the NDIS Act and ensures we collectively remain focused on "insurance-based thinking" as opposed to welfare-based thinking as a high-risk by-product and consumer led rationing based on short-term necessities.

#### **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)**

The processes outlined above, in combination with those set out in our response to the "access and eligibility" consultation will help to mitigate the risks inferred in this question by having in place:

- a. An acceptable “no disadvantage principle” relative to services (as opposed to funding levels)
- b. An acceptable and consistent level of baseline funding for all participants (with options for review)
- c. Ensuring funding mitigates existing and future risks
- d. Ensuring funding can be targeted and aligned to the insurance-based thinking principles of the Act (as opposed to short-term welfare-based thinking) and longer-term sustainability of the Scheme

It will also be important, at an NDIS level to ensure a rigorous quality management framework is in place to assure the independent assessment process. Our response to question 9 on the consultation paper issued on *Access and Eligibility Policy with independent assessments* details the specific items we believe should be included in a quality management framework to help ensure that plan budgets are at the right level. One of those specific items is “independent governance and oversight by the NDIS sector”, which will be critical in providing both the disability sector and individual participants with the necessary confidence that the independent assessment process is working effectively and fairly.

In addition, an independent evaluation of the implementation of both the independent assessment framework and the revised planning process will need to occur, to ensure that a rigorous post implementation review occurs of any changes and the new features implemented. Participants and the broader disability sector should have the opportunity to participate in this evaluation, with any results published to ensure full transparency of the findings and outcomes.

## **5. What new tools and resources should we provide to support people using their plan and the new plan flexibilities?**

In addition to the narrative below the “content” of the tools and resources should have a focus on some of the following: -

1. Purpose
2. Rights
3. Insurance based thinking
4. Roles and Responsibilities of participants and NDIA
5. Payment assurance/integrity
6. Reviews
7. Independent assessments
8. Check-ins and triggers
9. Budget allocations
10. Portability of funds
11. Safeguarding

Further, the six activity domains described on page 12 of the consultation paper under the section on ‘Determining reasonable and necessary funding’ will need to be defined and communicated clearly to all NDIS stakeholders. This will require the development of a new set of resources and tools; the content of which should have a clear line of sight to the participant’s plan and their level of funding.

There is a collective role “we” all play in ensuring and driving the right messages for participants. We encourage the NDIA to work in partnership with LAC’s and intermediaries who are closest to participants around what tools and resources are needed and how they can be best provided within the NDIS sector.

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

My Plan Manager believes plans for children aged 7 and above should look different dependant on the life stage of each child. As a result, the plan should have an immediate investment focus based on developing sustainable pathways and drawing connections to mainstream and community supports wherever possible. In short, the plan should be “life-stage” driven, having regard to a holistic view of individual and family and environmental circumstances and, where appropriate be informed by and have congruency with early intervention and networking strategies.

In circumstances where a young person has a pathway progressed from an ECEI model, it is important that either a “light” touch interim assessment or an exemption from full independent assessments occur (see our response to question 8 of the consultation paper regarding “access and eligibility”) to ensure a “seamless” transition process occurs and disruption to the young person and their key networks minimised. The level of plan funding should be considered having regard to the ECEI evidence, maximising continuity of supports wherever appropriate and developing future life-stage milestones and goals.

Further, we would recommend that each child is assigned a ‘pathway coordinator’ who is someone within the life of each family who works with the NDIS and the various other aspects of the child’s life, e.g., School, employment, and other mainstream services to assist the child and the family, to ensure the development and ongoing support for a joined up and seamless approach to community and mainstream engagement. This model has previously worked successfully in maximising a child’s development through the various pathways and life stages.

#### What ideas do you have for how people can use their plan more innovatively?

Allowing participants to be truly innovative goes to the very heart of the principles of the NDIS and empowering participants, via their planning conversations to be genuinely asked, “what do you want to do differently so you can achieve your goals”, will drive innovation in the use of a participant’s plan. We believe this should become a standard feature of an annual check-in with each participant. Adopting an apparent welfare-based approach and “rationing of funding” is, by itself, inconsistent with the type of innovation demanded by insurance-based thinking. Therefore, we make the following recommendations to support innovation when applying “insurance-based thinking” in the future construct of planning:

- *Access to, and integration with mainstream services:* is an area for additional research and innovation. From a policy perspective, access pathways centred around the persons with a disability should be developed, tested, and innovated. Thereafter, the funding pathways can

be developed to enable access and inclusion in mainstream. In doing so, disability can become mainstream.

- *Market innovation*: is essential to wider technological, social, and educational imperatives. The goal is to create innovative learning environments which connect centres of excellence, including universities and technology providers, with NDIA participants and providers. The Commonwealth has a policy role to play in stimulating university and technology investment.
- *Participant alignment*: the NDIA could work progressively with cohorts of participants and their key people to connect (and plan fund (ring-fenced funding)) innovative pathways between such centres of excellence and NDIA participant groups or individuals.
- *Innovation and market stability*: are, from a commercial investment perspective, inseparable. The NDIS has created an environment in which new providers (including plan managers) have evolved and have succeeded in developing innovative solutions based around client needs. In developing and reforming the NDIS as well as bringing about transformative change, it is to be recognised that market stability and supply are not only essential to the reduction of “thin markets” and maximising choice and control (and ultimately price control), but also impact the financial performance and confidence of the various sectors to invest in future innovation.

## 7. How to best handle the timing of the release of funds into plans and the rollover of unused funds?

Whilst prevention of overspending is an intended goal, it should be noted that the approach suggested in the consultation paper of having monthly or quarterly releases of funding is extremely problematic and presents key risks, including:

- The measurement of actual spend against released funding will only ever show the value of the invoices paid relative to the quantum of funding released.
- When there are insufficient funds in the release period (e.g., month), it is possible the NDIA will be “blind” to the cumulative value of services and supports accessed by participants for which invoice processing is pending until funds are released.
- It is foreseeable providers would chase participants for payment, whilst participants wait for funds to be released, which could result in the participant being considered a ‘bad debt’ or even worse providers withdrawing services or supports.

My Plan Manager believes that a move to regulate the release of funds through pre-determined intervals, exposes the NDIA to foreseeable risk, exposes participants to unnecessary risk and is unlikely to achieve the anticipated goal of preventing overspending for participants.

My Plan Manager, believes a more effective approach would be to:

- Provide either two six-monthly releases (in an annual plan) or even an annual release; or
- Only introduce quarterly or monthly releases when there is known risk of overspending or underlying perceived risk to participant vulnerability; and

- Monitor spending patterns by either the plan manager (if plan managed) or the NDIA (if Agency managed), with any issues of over-spending then triggering a check-in as needed.

Further, there is an opportunity to better utilise the services of plan managers to actively monitor spending patterns as part of their role through an initial budget meeting and the completion of subsequent participant check-ins. As plan managers are already supporting over 40% of NDIS participants we believe plan managers are better placed to perform this activity as part of a truly integrated and value-added service offering.

This alternative approach would largely avoid the need for any roll-over of funding month to month, but rather consider the issue of unused funds at the time of the participant check-in or when a plan variation occurs.

We acknowledge the problems outlined above could be overcome when the whole NDIS sector moves to a point-of-sale model for payment of services and Real Time Claims has been implemented. However, it will be some time before all providers, participants and plan managers are using this model for invoicing and then paying for services.

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

My Plan Manager believes participants are ordinarily best placed to know when they need further assistance, or navigating and accessing supports, however the undertaking of check-ins with participants at key intervals in their life cycle and during their plan is a good 'safety net' to ensure the welfare of the participant and confirm everything is 'on track'.

It will be important that the triggers for conducting check-ins are focussed on those positive items, like "how can I help to access needed services" rather than those just affecting plan funding, otherwise there is a risk that they will become regarded as 'check-ups' rather than proactive and genuine 'check-ins'. Should the participant's plan be focussed on achieving goals and the reaching of key milestones, then the likelihood is that check-in conversations will lead to a positive experience and one that is solution oriented.

Some of these key milestones could be changes in capacity, getting ready for a plan review, life changes etc. The inclusion of vulnerability checks is also important and will be an important safeguarding activity.

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

It will be important that check-ins occur as part of the natural flow of the plan, for example, as part of the start of the plan, at the end of the plan and as one of the triggers occurs as outlined in our response to question 8.

In terms of the “how”, it is important that the mode of communication be agreed at the time of the plan meeting to ensure there are “no surprises”; cultural safety will also be an important consideration.

#### **10. How can the NDIS ensure positive relationships between participants and planners?**

In our responses to the earlier questions the above narrative sets out several process and cultural ways the NDIS can ensure positive relationships between participants and planners.

It is important to ensure the NDIA values and promotes a truly person-centred approach to planning which is aligned to a participant’s goals and activities to create a significant uplift in trust and positive sentiment. Put simply the NDIA delegate should be positioned to be part of the solution. Also, interactions between participants and planners that are less about the financial aspects of the plan will be another key contributing factor. Performing positive oriented and proactive check-ins will also assist in this.

Taking a team NDIA approach by planners, LAC’s, Support Coordinators and Plan Managers to support the participant will drive positive connections and drive better outcomes for participants and the NDIS.

#### **11. How can we best support participants to transition to this new planning model?**

Our recommendations regarding this question are set out in the above responses (and our response to question 4) as well as our response to the “access and eligibility” consultation paper.

Notwithstanding this, it is vital the NDIA work with Plan Managers to overcome the difficulties inherent in running two different systems for two cohorts of clients over an extended period. In doing so it is recommended that an administrative solution, within NDIA delegated authorities, be progressed through the NDIS Price Guide to maximise portability of funds (for non-stated or “ring-fenced and capital” supports) as quickly as possible for all participants.

Such a solution would:

- Bring about a consistent approach from a participant perspective;
- Arguably assist in promoting “public support for the changes”;
- Fast track an important recommendation of the Tune review; and
- Mitigate the inherent risk of not making a “reasonable adjustment” to ensure one cohort of participants is not disadvantaged relative to other scheme participants over an extended timeframe.

Purely from a plan management perspective, it will be important that sufficient time is allowed to enable Plan Managers to implement technology and process changes which will also relate to changes to plan and budget set ups, and revenue allocations.

### Other items

My Plan Manager believes there are several other important items that the NDIA need to consider in its design of the new planning policy for personalised budgets and plan flexibility and how it will work with and/or impact on participants.

### Transitioning to the new arrangements for participants

Transitioning to the new arrangements will be a significant change for existing participants. As set out above, My Plan Manager believes the introduction of 'fixed' and 'flexible' budgets could occur now through changes made to the NDIS Price Guide.

Adopting this approach, we believe would allow the NDIA to introduce a more equitable and consistent approach for existing participants, without the need to progressively transition participants to the new model. Further, we believe this approach would result in less market disruption.

In the context of the NDIS, plan management is an important intermediary support that guides and helps build capacity for participants but also importantly, provides oversight, and assists in the monitoring of participants' service providers.

As evidenced by our growth and the overall level of plan management in the NDIS, participants see My Plan Manager as a trusted, valued, and independent partner in the effective and efficient utilisation of their plan funding. We recognise the significant backdrop of change proposed will create sector confusion and concerns for participants around their current level of supports and the impact to them. We believe My Plan Manager can help participants successfully navigate these changes, with the primary objective of supporting them access the right services for their individual needs and goals.

### Consultation with Plan Managers

Whilst consultation with Plan Managers has occurred as a by-product of the broader sector consultation on the implementation of independent assessments and the introduction of personalised budgets and plan flexibility, to date, there has been no direct consultation with plan managers on how these changes will impact the services they provide participants.

Specifically, the introduction of personalised plan budgets and plan flexibility for existing participants will be a major change for participants and will require plan managers to operate two 'systems' and processes during the transition period. It is unclear, at this point, how long this will occur for and how quickly NDIA expects plan managers to make the required changes. Clearly and importantly, there will be a cost impact for plan managers in making these changes.

My Plan Manager would welcome the opportunity to work with the NDIA and other relevant parties to discuss and plan for how to best implement the proposed changes to minimise the impact to participants, so the changes do not significantly disrupt the services provided by plan managers to over 40% of scheme participants.