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Submission to Productivity Commission

RE: NDIS – Costs-Position

By: Quality Living Options Bendigo Inc.

The NDIS commenced rolling out in this region in May 2017, and this is the first opportunity to make a submission, as there is now a very limited two months data to form a preliminary assessment.

Quality Living Options Bendigo Inc. is a registered charity, established by a group of carers of adult children with an intellectual disability. The key objective is to provide a safe, secure and appropriate place to call home for their children, when they are no longer able to do so. Many of our members are in their 70s or 80s and have been caring for their child for 40 to 50 years.

Accommodation has not been available until the principal carer has either died or has experienced serious health problems, which has determined they are no longer able to care for their child themselves.

We have now experienced a two-month period of plan preparation, which enables us to offer the following comments.

1. A major concern of parents in the planning process has been that of future accommodation. Planners however have not been willing or able to address this vital issue. When asked about SDA, one planner asked, "What is SDA?" It is clear that the planning process has concentrated, almost exclusively, on the first year care plan, refusing to even include a long-term aim of appropriate accommodation. This has resulted in continuing uncertainty about future accommodation. They are

unable to determine whether or not their child will be eligible for SDA.

2. Parents have asked for a guide to SDA eligibility criteria but this has not been made available. It would seem that the training program has ignored this vital aspect of the NDIS, in the rush to get numbers on the board.

#### *Response 1*

*The roll out is not working in the best interests of the scheme's participants. A slow down would seem to be one way to minimise the problems, which are apparent. One way to achieve this is for regions to process groups, starting with those most in need or will benefit most.*

#### *Response 2*

*The training of planners and others involved need to be considerably improved with an understanding of the full scheme and how it applies to the different groups of participants. This of it self may slow down the roll out.*

#### *Response 3*

*We would fully endorse the commission's recommendation that the review process should be stream lined so that specific aspects of a plan may be reviewed.*

3. An early plan participant has found that the care provider has not been paid in a timely manner. This would appear to be another consequence of a rushed roll out.
4. Without exception all our members' children are unable to make informed decisions or to exercise their right of choice without significant assistance from an advocate, in this instance their parent/carer.
5. The local experience has been that several carer organisations are no longer providing services, thus reducing the limited pool of competing organisations.
6. A number of members have reported that services previously provided by state funding and now to be provided under NDIS have increased in price.
7. Several members have advised that they are worse off under NDIS that under their previous arrangements.

#### *Response 4*

*The current legislation and administrative arrangements do not recognise the critical role, which an advocate plays in the process. This needs to be recognised and appropriate controls included to avoid abuse of this important position of trust. This is particularly important when a parent is no longer able to provide that support. This is not the same role as LACs who may be in the best position to provide the range of options but are not in the best position to understand what is most appropriate for the particular participant.*

#### *Response 5*

*Even Bendigo, with a population of 110,000 is not a large enough to provide an adequate competitive market for some services, particularly those of a more specialist nature. It is probable that some governmental controls will always be required for these 'thin' markets.*

#### *Response 6*

*It would seem appropriate that a reserve fund should be established as any enterprise seeks to do where future demands are uncertain. This needs to be built up over time as say 1% of outgoings per annum up to 10% full reserve fund.*

8. The question of SDA housing has yet to be settled. The original forecast was 6% of participants would be eligible. Based on the figures available to us for the City of Bendigo this would seem too low unless eligibility criteria is very narrowly enforced. All our members' children have been cared for at home for 40 to 50 years and have had full time supervision. This is now a requirement for future accommodation. It is quite unknown whether the SDA rules will recognise this need that arises from past history aggravated by the recognition that participants with an intellectual disability are likely to experience the aging process more quickly than their parents.
9. A main purpose of our organisation is to reduce the anxiety and stress to parents because their children's future is uncertain. So far the complete lack of attention to this area of the NDIS has done nothing but increase these stress levels. A number of organisations have approached us with a view to providing appropriate accommodation *providing* we can nominate participants eligible for SDA. The SDA funding model has been established in order to encourage private operators to provide suitable accommodation. This model gives the investor a significantly better return than the property market

generally. However, investors are reluctant to commit to building until the uncertainties surrounding SDA are resolved. We are also uncertain how to proceed with our plans until this question is resolved. It is quite possible that there will be a need to supply accommodation that is fully supervised but does not attract SDA funding because participants do not qualify. If there is this unmet need the question arises as to who will be responsible to cater for these participants' accommodation needs and ongoing care.

The State government has embarked on a refurbishing of their supported housing stock to meet SDA standards. Presumably they will then sell to the private market thus maintaining these houses as part of the SDA stock.

Our concern is that in order to achieve about a 6% level of SDA participants, the rules will be so restrictive that there will be a significant unmet need for supported accommodation.

*Response 7*

*The question of appropriate accommodation is an urgent matter for many families. The criteria for SDA need to be made available to participants' advocates as soon as possible. There also needs to be the ability for participants, through their advocates to establish whether or not they are eligible for supported accommodation through SDA. This will allow participants, parents and carers to plan adequately for the future.*

Quality Living Options Bendigo Inc.

Peter Foreman  
Executive Member and Treasurer