

Productivity Commission – NDIS Position Paper

Integra Responses

Introduction

Integra is pleased to continued dialogue with the Productivity Commission around how to improve the efficiency and sustainability of the NDIS. Based on our experience in Australia and the United States, we are confident that effective Intermediary services (i.e. support coordination and plan management services) can play a vital role in supporting NDIS participants, providers and the agency in realising the scheme's goals.

The Commission's summary of issues highlights many areas where Intermediaries can directly support many of our common goals, such as:

- Increased choice and control for NDIS participants
- Supporting participants in achieving plan goals
- Quality and safeguards for unregistered providers
- Scheme financial sustainability
- Building participants' capacity and increasing the likelihood of effectively activating their plans and achieving their goals

Based on our experience, we believe that by simplifying intermediary options and clarifying their purpose the NDIA can greatly minimise many of the challenges presently being experienced. We therefore recommend that the NDIA consider:

- Funding a panel of independent support coordination services (providers are required to demonstrate independence from service provision and their approach to capacity building. Cost effectiveness of support coordination assistance should be measured via standardised KPIs)
- Funding two plan management options, both using a "per member per month" pricing structure based on the true scope of services expected by participants, their providers and the agency.

Is there scope for Disability Support Organisations and private intermediaries to play a greater role in supporting participants? If so, how?

Intermediaries play a vital role in supporting participants in realising greater choice and control over their NDIS plans, as well as supporting the agency in achieving its financial objectives. Unfortunately, NDIS intermediary services are currently poorly designed, priced and communicated but some fairly simple changes could result in significant gains.

The role of intermediaries needs to be re-scoped and priced to offer an independent holistic service offering. This will empower many NDIS participants to leave their planning session and

to effectively take greater control of their plan and to make different choices, should they choose to.

To demonstrate the effectiveness of this solution, Integra's support coordinators and plan managers are currently deliver a holistic offering to our participants that include the services below:

Support Coordination

- "Unpacking (understanding) my plan so I can exercise choice and control"*
- Sourcing and selecting providers*
- Contracting providers*
- Capacity building*
- Preparing for plan review*

Integra participants in receipt of Support Coordination services have complex needs including, but not restricted to those with severe disability requiring multiple supports/services (e.g. participants with both hearing and visual impairment), conditions of a degenerative nature requiring regular adjustment to changing needs (e.g. participants with Motor Neuron Disease), participants who require multiple agency involvement (interpreter services/ state government agencies) or participants with a history of significant incident reports or crisis (early on set dementia).

Although we have developed a model of service provision that minimises staff travel, most Support Coordination participants often require face to face assistance in the early phase of their plan implementation. Integra Support Coordinators work intensively with the participant (and their carers) at plan implementation to identify ways the participant can build capacity, independence, choice and control, (wherever possible), and establish the supports and systems necessary to achieve their goals.

The lack of travel allowance for Support Coordinators fails to recognise the complex needs of clients and the critical nature of face to face service delivery in the early stages of service provision. Integra's services delivery model sees a reduction in travel requirements once services are established, but we request the agency includes in its Pricing Guide a fee structure for staff travel in the "establishment phase" of Support Coordination services. This is especially important outside metropolitan areas.

Plan Management

- Develop a participant's capacity in understanding their plan, budget and the choices available to them (increase capacity / reduce complexity)*
- Collaboratively develop a plan for initial plan activation / implementation*
- Collaborate and coordinate with the NDIA, support coordinators and LACs*
- Supporting the participant in sourcing services and items (as needed)*
- Work with the participant and providers on establishing service agreements and supporting a participant in negotiating rates and schedules as needed*
- Work with providers on service bookings / agreements / invoicing / payment processes*
- Providing the participant tools and personal support to effectively manage their NDIS budget*
- Conduct invoice processing (participant approvals required), NDIS billing and provider payment processes*
- Continued plan and budget monitoring and capacity building and planning*

It should be noted that many of the activities above are often associated with LACs, but our experience is that many of our LAC partners are overwhelmed and unable to spend the time needed on supporting participants.

Currently, we are offering this holistic solution without adequate funding as the current pricing (financial intermediary) is intended to primarily cover NDIA billing and provider payment activities. Also, the service intermediary (plan management activities) hourly fee is inconsistently added in participants' budgets / plans (currently approximately 30% of our participants have service intermediary hours).

With appropriate per member / per month (PMPM) pricing, accompanied by clarity of the scope of the role of plan managers, we feel that more independent, qualified plan managers will enter the NDIS market and more participants will be educated about their options and the benefits of working with a plan manager.

The cost of plan management (PMPM) should be considered an administrative cost / service and we believe this can be off-set/funded by associated savings realised by the agency; by deferring a considerable amount of participant and provider calls to the agency. If the NDIA limits the number of qualified plan managers in the market, allows plan managers to have expanded visibility and control over participant budgets in MyPlace and provides a few key resources for troubleshooting, call volumes to the help desk can be reduced. This will also result in increased participant success in activating their plans.

Based on research in the United States, self-directing participants who are properly supported by intermediaries spend around 90-95% of their budget. Participants using plan managers can also benefit from enhanced customer service and capacity building resulting in:

- Effective and efficient provider sourcing and contracting*
- Enhanced capacity to effectively manage their budget*
- Effective and consistent application of quality and safeguards*
- Enhanced capacity to understand how they can properly use their budget (in compliance with NDIS rules and guidelines)*

How would their role compare to Local Area Coordinators and other support coordinators?

For people with more complex needs who require support coordination, Integra works in partnership to ensure a participant's plan meets their needs and complex supports and services are located / sourced, including unregistered providers and community services. This a vital and complex team effort and a crucial part of this is to help participants understand the two roles and how they relate to each other.

As your paper discusses, LACs are new and overwhelmed and the Information, Linkages and Capacity Building (ILC) is just getting started. Meanwhile, tens of thousands of NDIS participants are leaving their planning sessions unsure what their options are and how to realise choice and control. Intermediaries are supporting and often supplementing the work of the LACs, to ensure participants have the capacity and tools to successfully implement their plans in a high quality fashion. If the role of intermediaries is properly designed, communicated and

supported, we believe there is an opportunity to increase the efficiency and effectiveness of the LAC role.

Are there any barriers to entry for intermediaries?

- *Conflict of Interest (COI): Intermediary effectiveness cannot be accurately measured until the influence of “potential COI” is removed, i.e. where providers of direct care are no longer able to simultaneously provide plan management or support coordination services to their participants.*
- Lack of understanding and confusion about the roles of intermediaries; in particular plan management: Define intermediary roles as described above and consistently educate and communicate about these roles
- Intermediary pricing:
 - Travel for support coordinators at the establishment phase
 - Need to have a set per member per month fee that is higher and includes a setup amount for new and revised plans. Eliminate the hourly service intermediary fee altogether

Are there sufficient safeguards for the operation of intermediaries to protect participants?

Support coordinators and plan managers can play a vital role in the consistent application of certain minimum quality and safeguard standards. For example, Integra support coordinators provide scheduled participant satisfaction check-ins regarding the quality of service provision to include:

- How well providers accommodate a participant’s preferences in service delivery
- Awareness of the process to make a complaint or provide feedback to a provider
- How comfortable a participant feels approaching a provider to discuss issues

Where issues are raised by the participant, Integra will assist with support, skills and training to exercise choice and control so they are comfortable.

Integra plan managers ensure all unregistered providers and directly employed providers have appropriate background checks and insurances in place, as well as highlighting the need for all labour and tax laws to be adhered to.

All NDIS participants should have the freedom to exercise these choices, while having an independent intermediary partner (plan manager or support coordinator) that will ensure all necessary quality and safeguards are in place, with no extra cost or additional administrative work. This supported freedom of choice is vital to meet the objectives of the Act and can also help address the anticipated provider shortages and current and future challenges of thin markets.

Should intermediaries be able to provide supports when they also manage a participant’s plan?

Intermediaries should be completely separate from support provision, as this is a clear conflict of interest. Plan management and support coordination solutions must be wholly independent, based on person centered thinking and self-directed principles, to ensure the participant is able to truly realise the benefits of the NDIS. In addition, as outlined above, it is crucial that

intermediary services are considered an administrative cost to the scheme and not a cost associated, direct service provision.