



leading quality in
community services

NDIS Costs

Response to Productivity Commission's Issue Paper February 2017

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1. Introduction

ACIA welcomes the opportunity to provide feedback on the Productivity Commission's Issue Paper relating to the 'National Disability and Insurance Scheme Costs'.

2. Background on ACIA

ACIA is the peak body representing community care and support providers, including private, not-for-profit and charitable organisations. Nationally ACIA represents over 100 provider organisations, which collectively employ more than 150,000 FTE workers. ACIA also supports the disability and aged care sectors and works with government departments and authorities, including:

- State Disability Agencies such as Department of Family and Community Services, Ageing Disability and Home Care NSW, Department of Health Human Services Victoria and Disability Services QLD
- iCare NSW which includes: Lifetime Care and Support Authority, Workers Insurance, Dust Diseases Care, Self-Insurance and Builders Warranty.
- Lifetime Support Authority South Australia
- Motor Industry Accidents Board, Tasmania
- Transport Accident Commission Victoria
- Workers Compensations Schemes in multiple states
- Representation at the National Aged Care Alliance
- Department of Health
- Department of Social Services

ACIA's vision is for a community care and support industry that is known and respected as a provider of quality services. To achieve this vision, ACIA provides education, resources and support to the industry, as well as developing and administering its own quality standard and scheme (endorsed by the Joint Accreditation System for Australia and New Zealand JAS-ANZ).

ACIA seeks to be involved in the future development of policy and service reform, by bringing to the discussion our experience and expertise, including:

- Membership of over 100 provider organisations and individuals nationally, representing around 150,000 FTE workers
- Membership across the disability and aged care sectors
- Specific expertise in the delivery of support to people living at home or in supported and shared accommodation arrangements

- Lengthy provider experience of delivering individualised support according to the wishes of the individual in line with their funding
- Experience in compensable and business markets
- Experience in the development implementation and administration of quality certification systems that meets the national standards for disability services and home and community care standards (for example the ACIMSS 2008 and the ACIS 2013)
- Proven track record of engaging positively with reform processes, and working collaboratively with governments, providers, consumers and interested stakeholders.

ACIA members are primarily concerned with how the NDIS will:

- Impact on the way in which quality support services are delivered;
- Detail arrangements by which service providers are both engaged and directed by the participants to deliver support;
- Establish processes which ensure care and support are delivered to the required standard, enhance participant outcomes and promote the dignity and autonomy of the participant.

3. ACIA's Involvement in the Development of the NDIS

ACIA has previously made submissions regarding the NDIS to the Productivity Commission, during the period of consultation in its enquiry into a National Disability Long-Term Care and Support Scheme and has also spoken at public hearings during that time. It also made a submission to the Senate Enquiry into the NDIS Bill 2012, the Regulatory Impact Statement in 2013, the Quality and Safeguards Framework consultation paper 2015 and review of the NDIS rules in 2015 and accommodation for people with disability.

Over the last 18 months, ACIA has worked with the Department of Social Services on the Development of the Quality and Safeguards Framework and the NDIS Scheme and Quality Standard. ACIA continues to work with the Department on roll out of the Scheme and the introduction of the Standard across Australia.

4. ACIA's Response to the NDIS Costs Issues Paper

4.1 Scheme Costs

ACIA has no comment relating to this section of the issues paper.

4.2 Scheme Boundaries

ACIA notes that scheme boundaries are essential in managing the costs of the NDIS. The scope of service provided to participants has a direct impact on the cost of the program delivery and the ongoing viability of the program. Consideration needs to be given to how existing services offered by States and Territories will be transitioned to the NDIS and how this will impact on the cost of the program.

Similarly, the transition of participants from the NDIS into the Aged Care system should be considered. Transitioning NDIS participants who choose to move to the Aged Care System when they reach age 65 moves the cost of service delivery for these participants into the Aged Care system. While this gives the NDIS program a clean boundary, the transition of participant care and costs of this transition should be considered.

Ensuring mainstream services are made available to people with a disability gives NDIS participants extended choice about how they conduct their lives and the types of activities they can engage in. Participation in mainstream services keeps the cost of those services outside of the NDIS. However, in order to ensure maximum inclusion of people with a disability in mainstream services such as education and health care, these services need to be sufficiently funded and equipped to include people with a disability. While funding may not be included as part of the NDIS for these services, adequate funding needs to be provided to ensure these services are supported.

4.3 Planning Processes

It has been noted by ACIA's members that there is an inconsistency between the Local Area Coordinators and the NDIA Planners in their knowledge of the industry. This difference in knowledge is particularly apparent in regard to the requirements of participants with high intensity support needs. The knowledge difference can affect decision making when planning supports for this cohort. Cases where planning decisions are not aligned to the actual needs of the participant can lead to an impact on funding.

ACIA members have commented that there are a number of instances where there has been a lack of understanding from planners about services that require more than one Support Worker. This is particularly the case for participants with

significant mobility issues and behaviours of concern. A lack of knowledge has also been seen in some planner's understanding of the scope of a Support Worker's role versus the role of a Registered Nurse. A Support Worker who is deemed competent by a Registered Nurse can provide clinical supports to someone who has a spinal cord injury or who is ventilated dependant. Planners need to have a good understanding of when it is appropriate for Support Workers to perform these tasks and when it is not.

Ensuring that support plans align to the actual needs of the participant is vital in enabling the service provider to deliver quality services to participants. Therefore, when considering ongoing costs to the NDIS program, ACIA believes it is vital that adequate resources are given to ensure sufficient knowledge of NDIA planners.

4.4 Market Readiness

In order for Service Providers to be ready to contribute to the NDIS, it is important that the full scope of costs incurred by Services providers is considered. Two areas where ACIA believes further consideration should be given are in the cases of low level assistance rates and costs of travel.

ACIA members are generally finding issues with low level assistance rates. This includes some instances where providers are expected to provide lower level paid supports to a participant who is also receiving high intensity supports. ACIA strongly suggests this approach creates a risk to the participant. Participants in this category require Support Workers with a high level of competency at all times. This is the case even when specific activities are being carried out that may be considered to hold a lower level of risk.

The cost of providing transport is important to consider. ACIA members feel that there is a lack of recognition relating to the cost of providing services in this support category. The current concepts and way of operating do not cover provider costs of providing a Support Workers vehicle for a participant to access their community support services.

For these costing issues to be addressed, it would be recommended that a process be implemented that allows service providers to engage directly with NDIA Planners to discuss these issues on a case by case basis.

4.5 Governance and Administration of the NDIS

ACIA acknowledges that the governance and administration of the NDIS could have a significant impact on the ability of the NDIS to be delivered to the standard

set out in the Quality and Safeguards Framework. ACIA agrees with comments in the Productivity Commissions Issues Paper noting that:

‘while a generous operating budget could be wasteful, insufficient funds could curtail the NDIA’s ability to deliver the scheme efficiently’¹

ACIA would also like to note that it will be necessary to ensure sufficient funding exists to administer the Quality and Safeguard Framework and the administration of the NDIS Standard. Ensuring sufficient funding to allow for the successful ongoing administration of the Framework will be essential for the safe and reliable delivery of the NDIS.

4.6 Paying for the NDIS

ACIA has no comment relating to this section of the issues paper.

5. Summary

ACIA is pleased to have had this opportunity to provide input to the Productivity Commission’s Study on the NDIS Costs. We look forward to seeing the outputs of the next stage of the study and hope to be able to provide further input.

¹ Page 28, NDIS Costs, Productivity Commission Issues Paper