



Disabled
People's
Organisations
Australia

Submission

Productivity Commission

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‘Disabled People’s Organisations Australia (DPO Australia) Submission to the Productivity Commission Issues Paper: National Disability Insurance Scheme (NDIS) Costs’.

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1. Disabled People's Organisations Australia (DPO Australia)

Disabled People's Organisations Australia (DPO Australia) is an alliance of four national DPOs in Australia. DPOs are organisations that are governed, led by and constituted of people with disability.

The key purpose of the DPO Australia is to promote, protect and advance the human rights and freedoms of people with disability in Australia by working collaboratively on areas of shared interests, purposes and strategic priorities and opportunities.

DPO Australia was founded by, and is made up of four national population specific and cross-disability DPOs that have been funded by the Australian Government to be the recognised coordinating point between Government/s and other stakeholders, for consultation and engagement with people with disability in Australia.

The four DPO Australia members are:

[Women With Disabilities Australia \(WWDA\)](#) is the national cross-disability DPO for women and girls with all types of disabilities in Australia. It operates as a transnational human rights organisation and is run by women with disabilities, for women with disabilities. WWDA's work is grounded in a human rights based framework which links gender and disability issues to a full range of civil, political, economic, social and cultural rights.

[First Peoples Disability Network Australia \(FPDNA\)](#) is the national cross-disability DPO representing Aboriginal and Torres Strait Islander people with disability and their families. FPDNA utilises a range of strategies in its representative role, including through the provision of high-level advice to governments, and educating the government and non-government sectors about how to meet the unmet needs of Aboriginal and Torres Strait Islander people with disability.

[People with Disability Australia \(PWDA\)](#) is the national cross disability rights and advocacy organisation run by and for people with disability. Working within a human rights framework, PWDA represents the interests of people with all kinds of disability. Its primary membership is made up of people with disability and organisations primarily constituted by people with disability. It also has a large associate membership of other individuals and organisations committed to the disability rights movement.

[National Ethnic Disability Alliance \(NEDA\)](#) is the national peak organisation representing the rights and interests of people from Culturally and Linguistically Diverse (CALD/NESB) people with disability, their families and carers throughout Australia. NEDA advocates at the federal level so that CALD/NESB people with disability can participate fully in all aspects of social, economic, political and cultural life.

2. Introduction

DPO Australia welcomes the opportunity to provide our comments to the Productivity Commission's Issues Paper on the National Disability Insurance Scheme (NDIS) Costs.

The member organisations that make up DPO Australia engage in a range of meetings, reference groups, inquiries and committees convened by the National Disability Insurance Agency (NDIA), the Joint Standing Committee on the NDIS, various Senate Committees, government agencies as well as other stakeholders. The member organisations of DPO Australia also have strong grassroots connections to people with disability and are constantly receiving feedback, supporting people to access disability supports, undertaking the role of Disability Support Organisations (DSOs), resourcing local support networks and facilitating engagement and consultation with people with disability, including in relation to the NDIS. DPO Australia is also supporting individuals with disability to make submissions to this Issues Paper.

Our submission draws on this expertise and feedback with people with disability to provide our key comments in response to the majority of questions outlined in the Issues Paper.

Member organisations of DPO Australia are also continuing to consult with people with disability on the issues relevant to the Productivity Commission review of NDIS costs, and will use this further feedback to inform our response to the next phase of the review contained in the Discussion Paper.

3. Key Comments

3.1 Investment in people with disability

DPO Australia is strongly committed to a sustainable NDIS. We are actively engaged with NDIS design, implementation and review to ensure that the NDIS, as a social investment, achieves its outcomes of significantly stronger economic, social and civic participation of people with disability.

This is a critical point in the context of this review of the costs of the NDIS, as there appears to be little to no focus in the Issues Paper on the costs of **not** achieving the outcomes of the NDIS nor the cost benefits to Australia of increasing economic, social and civic participation of people with disability, including financial offsets in social welfare spending and increases to Australia's Gross Domestic Product (GDP).

Page 32 of Issues Paper does acknowledge that the broader benefits of the scheme, including its insurance cover for all Australians "are non-monetary and therefore not easily weighed against the costs". While this is true, cost benefit analyses have been a focus of other reports and studies,¹ as well as the Productivity Commission's 2011 Inquiry Report² that found that the

¹ Deloitte Access Economics, 'The economic benefits of increasing employment for people with disability', August 2011, Australian Network on Disability, <https://www2.deloitte.com/au/en/pages/economics/articles/economic->

benefits of the scheme would far outweigh the costs, with the NDIS only having “to produce an annual gain of \$3800 per participant to meet a cost-benefit test, and that this ‘test would be passed easily”.³

We recommend that cost benefit considerations should underpin the current Productivity Commission’s review of NDIS costs.

3.2 Sustainable and secure funding

In its 2011 final report, the Productivity Commission stated that “funding for disability must move away from the uncertainty underlying the annual determination of government budgets for disability support”.⁴ Unfortunately, this has not been achieved, and despite bipartisan political support and the widespread backing of the Australian community, federal funding for the NDIS continues to be the subject of political debate and an issue for cost saving measures in the annual budget process.

This has created considerable anxiety and concern for many people with disability about the future and sustainability of the NDIS as political debate and media coverage focuses on how the NDIS will be paid for, and the government identifies and implements budget measures focused on cuts to welfare and essential services to pay for the NDIS. This not only undermines community support for the NDIS, it also undermines funding stability, sustainability and security.

The Government has proposed the NDIS Savings Fund Special Account Bill 2016, which is currently before Parliament, to address NDIS funding security for the Commonwealth. However, this Bill retains the focus on identifying savings from welfare and existing programs and would subject NDIS funding to the policy priorities of the government of the day.⁵ In the 2016/2017 Budget, a number of measures were proposed to shift funding to the NDIS that would have a negative impact on people with disability by creating trade-offs between income support and disability support. Income support and specialist disability support are different, but complementary aspects of support for people with disability and it is counter-productive to cut one to fund the other. It is also likely to create harmful divisions between people with disability and other people ‘doing it tough’ who may be subject to welfare and essential program cuts to fund the NDIS.

Significant advocacy was required by a range of disability and community organisations to ensure that the harsh 2016/17 Budget measures were not passed by Parliament, and this advocacy would be required annually to counteract budget cuts to welfare and essential services to fund the NDIS.

[benefits-increasing-employment-for-people-with-disability.html#](#) ; PriceWaterhouseCoopers, ‘Disability expectations: Investing in a better life, a stronger Australia’, November 2011, pwc, <https://www.pwc.com.au/industry/government/assets/disability-in-australia.pdf>

² Productivity Commission, ‘Disability Care and Support’, 10 August 2011, Commonwealth of Australia, <http://www.pc.gov.au/inquiries/completed/disability-support/report/disability-support-volume1.pdf>

³ Ibid, p.2.

⁴ Ibid, p.33

⁵ For a full discussion of this Bill see: Disabled People’s Organisations Australia, ‘National Disability Insurance Scheme Savings Fund Special Account Bill 2016’, Submission to the Senate Standing Committees on Community Affairs, 12 October 2016, <http://dpoa.org.au/submissions/dpoa-ndis-savings-fund-special-account-bill-2016-inquiry/>

As a social investment for all Australians, NDIS funding must be dedicated and guaranteed, and removed from annual budget cycles and political debate.

We recommend that the funding sustainability for the NDIS must be dedicated, guaranteed and removed from annual budget cycles and political debate.

3.4 National Disability Strategy

The National Disability Strategy 2010-2020 (NDS) is the strategy agreed by all Australian governments to implement and report to the United Nations against progress in achieving the Convention on the Rights of Persons with Disabilities (CRPD).⁶ The NDS “adopts the principles set out in Article 3 of the CRPD”,⁷ and the “six policy areas of the Strategy are aligned to the articles of the CRPD”.⁸

The NDIS implements a key component of policy area 4, ‘Personal and community support’ of the NDS.⁹ This means that the design and implementation of the NDIS is an NDS measure aimed at progressing the human rights of people with disability, or the full and equal participation and inclusion of people with disability in all aspects of Australian life. Critically, the success of the NDIS is dependent on parallel success in the other five NDS policy areas. For example, without accessible and inclusive transport, employment, education, health services, communications and information access, rights protection and justice, a person with disability will not be able to fully benefit from an NDIS funded package; they may have specialist disability supports but they will still have barriers to accessing all areas of community life.

This situation is highly likely to be a cost driver and have cost implications for the NDIS: people may be unable to fully benefit from their NDIS funded package if they are unable to access the community; a package may have higher costs because of a reliance on specialist disability supports that could be provided by mainstream supports but these are inaccessible; and there is an increase in people reliant on the NDIS because there is little to no accessible mainstream supports and services.

While COAG has reaffirmed its commitment to the NDS,¹⁰ the most recent NDS progress report¹¹ provides a clear indication that concrete actions and coordinated investment in the NDS is lacking but very necessary if it is to provide the parallel reform required to ensure the success of the NDIS.

We recommend COAG provide further coordinated investment, concrete actions and renewed focus on the NDS in parallel to addressing sustainable funding for the NDIS.

⁶ Council of Australian Governments, *National Disability Strategy 2010-2020*, Commonwealth of Australia 2011, pp. 16-17

⁷ Ibid p. 22

⁸ Ibid p.17

⁹ Ibid pp. 16-17

¹⁰ COAG Disability Reform Council, ‘Communique’, 2 September 2016, p.2,

https://www.dss.gov.au/sites/default/files/documents/09_2016/drc_communique_2_september_2016.pdf

¹¹ Department of Social Services, Progress Report to the Council of Australian Governments 2014

3.5 Engagement mechanisms with people with disability

In December 2017, DPO Australia joined with a diverse partnership of representative organisations of people with disability, disability advocacy organisations and disability peak bodies to release a civil society NDIS Statement to COAG and the National Disability Insurance Agency (NDIA) calling for stronger engagement with people with disability in all aspects of the implementation of the NDIS.¹²

The statement was prompted by the considerable and growing concerns expressed by people with disability, disability representative organisations and other stakeholder organisations regarding limitations and failures in NDIS design and implementation. The statement noted that:

“In many cases, limitations and failures in NDIS design and implementation, such as ‘First Plan’ processes, reimbursement for self-managing participants, inaccessible administrative processes, barriers to communicating with NDIS decision makers and the failures of the NDIS online portal have resulted in significant additional costs to manage and address. These situations and the associated significant costs to fix design and implementation problems may well have been avoided if people with disability and our organisations were integral to the NDIS from the outset. Our involvement is underpinned by the vision, intent and objectives of the NDIS, but importantly, our involvement also makes good economic sense.”¹³

DPO Australia continues to receive feedback from NDIS participants about processes and procedures that have adverse cost implications, and we note that many submissions to the Productivity Commission from individuals outline exactly these issues. In many cases, these adverse cost implications could be avoided if systems, processes and protocols were designed and reviewed with NDIS participants so that they were ‘fit for purpose’ from the beginning.

DPO Australia understands that in some cases the Federal Government has made decisions that have embedded the NDIA in bureaucracy and red tape. For example, the design and control of the online portal was allocated to the Department of Human Services (DHS), which resulted in replication of a bureaucratic online system for people with disability that caused significant disruption to NDIS implementation and enormous costs to rectify. Likewise, we understand that the oversight and audit processes for self-managed NDIS participants are based on existing Australian National Audit Office (ANAO) requirements and have created a level of bureaucracy that discourages people with disability from taking up this option.

While we acknowledge that there does need to be robust processes and oversight, the NDIS is a significant reform that requires sophisticated design and ‘fit for purpose’ processes based on the expertise of people with disability ourselves. It is critical that the NDIA does not “become another Commonwealth agency that is part of ‘big’ bureaucracy and removed from the people it is meant

¹² ‘Civil Society Statement to the Council of Australian Governments (COAG) and the National Disability Insurance Agency (NDIA)’, DPO Australia, 2 December 2016, <http://dpoa.org.au/news/call-for-stronger-engagement-with-people-with-disability-in-the-national-disability-insurance-scheme-ndis/>

¹³ Ibid, p.1

to serve and engage.”¹⁴

We recommend that COAG and the NDIA employ the measures outlined in the Civil Society NDIS Statement.

We recommend that the implementation of the NDIA is not embedded in government bureaucracy, and that NDIS design and implementation is ‘fit for purpose’ and co-designed with people with disability and their representative organisations.

3.6 Information, Linkages and Capacity Building (ILC)

Only about 10% of people with disability will be eligible for NDIS individual funded packages, so it is critical that mainstream services and supports and the community is accessible and fully inclusive for all people with disability. The ILC policy framework is designed to build community and mainstream service capacity, and the capacity of people with disability and their families in order to reduce the need for specialist funded supports and / or the escalation of support needs. ILC is critical to ensure that all people with disability benefit from the NDIS, regardless of eligibility for an individual funded package.

However, there is considerable concern among people with disability and their representative and advocacy organisations that the level of funding allocated to the ILC is not sufficient to achieve its purpose. Although the ILC funding allocation is \$680 million, most of this - \$550 million – has been allocated to fund the Local Area Co-ordination (LAC) program. While LAC functions do have roles of connecting people to mainstream and community activities and to creating accessible and inclusive communities for people with disability, most recently the focus of the LAC program has changed and almost entirely been taken up with NDIS planning functions. This change in focus reduces capacity to build accessible mainstream and community supports and services, and the remaining \$132 million is insufficient to build accessibility and inclusion.

The result will be greater costs as people with disability continue to rely on specialist disability supports through NDIS individual funded packages; experience deterioration of impairments and inadequate living situations requiring NDIS individual funded packages; rely on inadequate and inappropriate supports; and / or ‘fall through the gaps’ of inaccessible mainstream services and community activities. These greater costs are highly likely to be greater than the funding allocation for the ILC.

We recommend that ILC is resourced appropriately to achieve its objectives; that planning responsibility is retained by the NDIA so that LACs can focus on ILC outcomes; and that ILC is recognised as a long term activity and integral to the success of the NDIS and the NDS.

¹⁴ Ibid. p.2

3.7 Market-driven disability supports, cost-shifting & program transition to the NDIS

It is becoming increasingly clear that the ideal of a mature, market-driven disability support system is far from reality, and there is a real risk that many people with disability will not have genuine 'choice and control' where there is no market or where there are very thin markets.

Existing service providers are concerned with viability and minimising costs, which has had an impact on the range and type of support provided as well as a loss of smaller niche operators and the emergence of a limited number of larger service providers. In some areas, including many rural and remote areas there may be no services and supports or only one service provider that may not cover the range of supports required. Non-government providers may refuse services to people they regard as 'too difficult', too costly, or where they do not have sufficiently skilled staff to meet their needs.

DPO Australia is particularly concerned about very remote communities, including Aboriginal and Torres Strait Islander communities that may be small, have little to no existing infrastructure and limited communication mechanisms, such as the internet. Significant investment in community owned and operated community development, in outreach and inreach service provision and infrastructure partnerships between local councils and State and Territory governments is critical in these areas. Aboriginal and Torres Strait Islander communities must have ownership and control of their own community development, including building community capacity and economic opportunities to deliver specialist disability supports.

Some States and Territories, such as NSW are withdrawing from disability service funding and provision entirely. Consequently, government services and funding streams are being wound down, government assets are transferring to the non-government sector, and a number of services and supports are being provided by 'for profit' organisations. There is a growing risk that the transfer of state assets and service will undermine the emergence of a diverse, competitive and sustainable market for disability supports, and consequently limit the choice and control of people with disability.

One example of this in NSW is the outcome of the recent tender process to shift 300 government run group homes to the non-government sector. The outcome means that two larger service providers have been selected by the government to take control of the group homes, leaving people with disability without any choice of service provider.¹⁵

The withdrawal of government funding and service provision risks leaving many people with disability who are not eligible for the NDIS with little or no disability supports. Their requirements may include support to attend medical appointments and participate in recreational activities, help with everyday tasks such as shopping, cooking, cleaning and personal care, basic equipment or use of free community transport. With government funding for disability services being entirely diverted to the Commonwealth to fund the NDIS, people with disability are concerned that access

¹⁵ Alison Branley, 'Disability services sell-off in New South Wales being bungled, carers say', ABC News, 31 March 2017, <http://www.abc.net.au/news/2017-03-31/nsw-govt-accused-of-bungling-sell-off-of-disability-services/8401404>

to these essential services will be lost, will not be accessible in the mainstream and will need to be paid by people with disability.

In addition, a number of people with disability are recipients of government programs that are proposed to being transitioned into the NDIS, such as the Mobility Allowance and the Personal Helpers and Mentors Program. This means that the costs of these services will shift to people with disability who rely on these services but are not eligible for the NDIS, unless there are continuity of support provisions for current users. However, continuity of support does not apply to future users of these supports.

DPO Australia is very concerned about the decision by the previous Western Australian Government to establish its own NDIS. Despite a number of nationally consistent provisions in the bilateral agreement, it is concerning that the WA NDIS will have different funding arrangements and accountabilities and a greater focus on service provider control. This is highly likely to prevent market growth and innovation for people with disability in WA and create inequities in the provision of specialist disability support in WA.

In the emerging and largely unregulated open market for disability supports, it is essential that the needs of all people with disability including those who are not eligible for funding packages under the NDIS are met; that consumers are protected from exploitation, especially the vulnerable and marginalised; that the profit motive does not quash quality, diversity or innovation; and that the new environment serves to enhance rather than threaten the realisation of rights for people with disability.

DPO Australia welcomes the recent commitment made by the COAG Disability Reform Council:

“The Council noted a key risk to NDIS implementation is the development of a market to ensure the supply of quality supports and workforce to NDIA participants. The Council endorsed the work to support the NDIS market and development of the national NDIS quality and safeguarding system. The Council agreed to Key Performance Indicators (KPIs) to monitor market development and performance and to identify immediate and emerging market risks.”

It will be critical that KPIs and monitoring of market development and performance are inclusive of the issues and risks to people with disability highlighted in this section.

We recommend that COAG Disability Reform Council ensure that KPIs and monitoring of market development and performance consider the varied contexts and circumstances faced by NDIS participants; the decisions made by government to transfer funding and programs that impact on the market; and consider the market in terms of people with disability who are not eligible for the NDIS.

We recommend that the new WA Government renegotiate the bilateral agreement with the Commonwealth so as to join the national NDIS, enable greater market diversity and growth and ensure equity for people with disability in WA.

We recommend significant investment in locations without any market for specialist disability support, such as significant investment in community owned and operated community development, in outreach and inreach service provision and infrastructure partnerships between local councils and State and Territory governments is critical in these areas. Aboriginal and Torres Strait Islander communities must have ownership and control of their own community development, including building community capacity and economic opportunities to deliver specialist disability supports.

3.8 Interface with other programs

DPO Australia acknowledges that mainstream services should be accessible and inclusive of all people in the community, including people with disability. The role of the NDIS is to provide the specialist disability supports to enable inclusion and participation in the community (the role of the NDS). However, there are a number of concerns that people with disability raise in relation to the interface between the NDIS and mainstream services and supports:

- The lack of accessibility of mainstream services and supports often means that even with specialist disability supports funded by the NDIS, people with disability are still not able to receive all the support they need to access community life. A renewed focus on the NDS, as outlined above is critical to the success of the NDIS.
- There may not be the support or not the appropriate support available in other service systems for a person with disability to access, and there doesn't appear to be an identification of these gaps and a coordinated plan to address these gaps. For example, Language other than English (LOTE) interpreter supports are no longer included in an NDIS participant's plan unless this support is directly relevant to a participant's impairment or health condition. These supports need to be accessed through other mainstream services and supports. However, there is a very limited category of organisations that can access free interpreting services and so disability and mainstream service providers and / or people with disability will be required to pay for this service. This is likely to lead to an inappropriate reliance on family members and friends to act as interpreters.
- There is an assumption that States and Territories are providing the appropriate supports to people with disability through the mainstream or their own specialist disability support systems. In some cases, States and Territories are entirely withdrawing funding and services for disability support while others are retaining a residual role in specialist supports. This creates inequity in programs within different jurisdictions. For example, NSW is ceasing its funding of specialist disability criminal justice programs based on the rationale that this should be the purview of the mainstream criminal justice system. It may be that specialist support programs should be built into the NSW mainstream criminal justice system, but this is not currently the case, and there appears to be no forward planning in the context of the NDIS to shift funding and specialist programs into this mainstream. This will have a significant adverse impact on people with disability who come into contact with the criminal justice system as well as exposing the State to significant, additional costs in higher rates of incarceration and tertiary level responses.
- There is an assumption that other service systems provide equity of support for people with disability, who are not eligible for the NDIS. For example, people over the age of 65

are ineligible for the NDIS unless they entered the scheme prior to this age, and they are expected to access specialist disability support through the aged care system. However, the aged care system is not focussed on specialist disability support; it requires co-payments to be made for services and supports; and it lacks the focus on choice and control and participation in community life. Continuity of support programs will not benefit those who acquire disability and are not already in receipt of specialist disability supports. This creates inequity in the provision of specialist disability supports for older people with disability.

In the context of these issues, DPO Australia welcomes the commitment by the COAG Disability Reform Council to the NDS and in particular to increase “focus on mental health, health and the criminal justice systems to ensure that these systems are effectively supporting all people with a disability in Australia.”¹⁶ However, more needs to be done to ensure consistency for all people with disability across all service systems.

We recommend that concerted measures are included in the NDS to ensure that all mainstream and specialist service systems are fully accessible to people with disability; that specialist disability programs are developed and integral to mainstream and specialist service systems; and that the provision of specialist disability support is aligned, integrated and equitable across service systems, including ageing, mental health, health and the criminal justice system.

3.9 Independent representation and advocacy

No support, complaints or safeguarding systems are perfect, and representative organisations of people with disability and independent advocacy act as ‘early warning systems’ and ‘system savers’ to prevent and respond to limitations and failures for people with disability. The connections with and support provided to people with disability means that it is often independent representation and advocacy that initially identifies and responds to the failures and gaps in the disability, aged care, health and other mainstream support systems.

A number of States and Territories will no longer provide funding for their independent advocacy and representation roles as this funding will be provided to the Commonwealth for the NDIS. Although the Commonwealth is currently reviewing the National Disability Advocacy Program (NDAP), there is no guarantee that this national program will significantly increase resources to support the local and State based advocacy and representative organisations that will lose State-based funding.

In addition, there is concern about perceptions that independent advocacy and representation will be replaced or subsumed into the role of LACs. This is extremely misleading as LACs assist people with disability to link to mainstream services, while independent advocacy and representation assists when the system fails, where there are service gaps and when solutions need to be found to address these system failures and gaps.

Along with the NDS and the NDIS, independent advocacy and representative organisations of

¹⁶ COAG Disability Reform Council, ‘Communique’, 3 March 2017, p.2, https://www.dss.gov.au/sites/default/files/documents/03_2017/communique_3_march_2017.pdf

people with disability play a critical interconnecting role in progressing the human rights of people with disability and supporting Australia's international human rights obligations.

We recommend that the 'system saving' and 'safeguarding' role of independent advocacy and representation is recognised and sufficiently resourced through NDAP and through investment from State and Territory governments.

3.10 Planning processes

There are significant concerns consistently raised by people with disability regarding the planning process, particularly since the introduction of 'My First Plan'. This includes:

- Not having sufficient support, including pre-planning support to exercise choice and control, to understand the scope of supports, to feel confident in asking for particular supports or know what is available to even consider what a choice may be.
- The inaccessibility of information and planning processes, the lack of time to adequately discuss and work through what is required, the lack of time to consider equal access for people with different communication needs (including Auslan, Deafblind interpreters and community language interpreters), the completion of plans over the phone, and the control of plans by planners, LACs and service providers.
- Plans undertaken with family members or carers because of planning inaccessibility or time pressures.
- Lack of skills of planners, including lack of expertise and knowledge in people with disability, disability types and why particular supports are 'reasonable and necessary'.

It is very clear that pre-planning, the expertise of planners, the flexibility and individualised plan processes and a feeling of 'ownership' of the plan achieve much better outcomes for NDIS participants. The My First Plan process has focused on meeting targets for people with disability entering the NDIS rather than on supports to achieve goals and aspirations. This has left many people with disability and their families very dissatisfied, as plans can largely just replicate current supports, can provide less supports than under the previous system or may contain inappropriate supports.

It also means that people with disability and their families are waiting until the 12 month review process to try and modify an inadequate plan, as attempts to modify prior to the review is a lengthy process.

We recommend that the NDIA work with people with disability and representative organisations to identify best practice in the planning process in order to increase planner expertise, participant satisfaction and integrate an improved planning process.

3.11 Data and eligibility

DPO Australia has some concerns about the accuracy of the data used by the NDIA to estimate the number of NDIS participants at full scheme.

NEDA notes that the term 'Culturally and Linguistically Diverse' is not the same as 'Language Other

Than English', but they are often used and measured interchangeably. NEDA has provided advice on this issue to the NDIA, and the figures have been revised to be more consistent with NEDA's definitions of these terms. However, there are still inconsistencies, given the reliance on figures from the Australian Bureau of Statistics 'Survey of Disability and Carers', which is predominately responded to by English language users and has had problems with how the language question has been asked. NEDA has its own figures that indicate that there are higher numbers of people who will require support from the NDIS than the official figures indicate.

FPDN also notes the disparity between NDIA projections for the number of Aboriginal and Torres Strait Islander people with disability and their own much higher figures. Many Aboriginal and Torres Strait Islander people with disability have never been part of service systems and / or there have never been supports or services provided in their communities. In many remote Aboriginal communities, the NDIS is still not known or understood.

DPO Australia is also concerned by the disparity in figures that indicate that many more males than females have met the access criteria for the NDIS.¹⁷ This needs further investigation to identify gender specific measures to increase access, to ensure gender responsiveness in planning and to ensure that gender specific supports are recognised and funded.

We recommend that the NDIA analyse the disparities in data to increase accuracy for future projections of NDIS participants.

We recommend that the NDIA investigate the disparity in figures between male and female access to the NDIS and work with women with disability and their representative organisations to identify gender specific measures to increase access, to ensure gender responsiveness in planning and to identify gender specific supports.

DPO Australia thanks the Productivity Commission for the opportunity to contribute our views on the Issues Paper, and we would welcome further consultation on any of the matters raised in this submission.



¹⁷ National Disability Insurance Agency, 'COAG Disability Reform Council Quarterly Report', January 2017, National Disability Insurance Scheme Launch Transition Agency, p. 54