

**SDN Children's Services**  
**Response to Productivity Commission Issues Paper**  
**National Disability Insurance Scheme Costs, February 2017**

## **1. Introduction**

SDN Children's Services (SDN) welcomes the opportunity to respond to the Productivity Commission Issues Paper, February 2017 on National Disability Insurance Scheme Costs ahead of the final design of the scheme prior to full rollout.

SDN acknowledges the terms of reference for this study, recognising the need for scheme costs to be sustainable, while ensuring that jurisdictions have the capacity to deliver services that integrate well with mainstream services.

SDN supports the objective of the NDIS to improve the lives not only of current scheme participants, but also future participants. While we acknowledge that *this will only be the case if the scheme is financially sustainable* (Issues Paper, p.7), we also suggest that this will only be the case if the scheme is also accessible and supports timely access to quality services.

## **2. About SDN**

SDN Children's Services is a not-for-profit organisation established in 1905, and is one of Australia's experienced and trusted leaders in mainstream early education and child care; disability services for children, and family support.

Our mission is to:

- provide high-quality, inclusive early childhood education and child care. This means our services are safe, affordable, inclusive and as inspiring as possible
- strengthen families and communities. This means we build strong connections within communities
- address inequalities faced by children. This means we challenge discrimination and help remove barriers to full inclusion.

We believe in the rights of children as articulated in the United Nations Convention on the Rights of the Child, and are committed to social and educational inclusion. Through our strategy we seek to enhance the wellbeing of children and to make sure that children facing challenges have a place in the services we operate, support and advocate for.

We operate an integrated model of service delivery using our Pathways Approach that brings together our expertise in mainstream and specialised service delivery. In all, around 5,000 children, families and other service providers benefit from SDN's work each year.

We were selected to partner with the NDIA to be an NDIS Registered Provider for children in the ACT from 2014, and have been providing registered supports in the Nepean Blue Mountains in NSW since July 2015. We were also selected by the NDIA to trial the Early Childhood Early Intervention (ECEI) approach in the Nepean Blue Mountains in NSW from 2015, and currently provide ECEI transitional services across metropolitan Sydney.

SDN's submission focuses on early childhood intervention issues only. We have chosen to focus on this aspect of the Issues Paper due to our long experience working with children and their families through early childhood education and early intervention, as well as our recent experience providing services to children and their families under the NDIS.

### **3. SDN's response**

#### **3.1 Eligibility**

SDN supports the inclusion of 'developmental delay' in the criteria for access to the NDIS. While this has increased the size of the NDIS eligible cohort, it has addressed the right of young children to access reasonable and necessary supports in the critical early years of life. This period of life is when developmental trajectories are varied and flexible. Families should not be dependent on slow or non-existent diagnostic services or require a diagnostic label before a developmental picture of their child is clear.

SDN recommends that families be provided with information that is clear and timely about the ongoing nature, or otherwise, of their child's eligibility for NDIS as their child's needs change and potentially become less severe.

SDN recommends that a proportion of NDIS funds in plans be specifically allocated to support the transition out of NDIS for those children where it is likely that eligibility status will change when a plan is reviewed.

SDN also recommends that the option for re-entry into the scheme be retained if there is an increase in a child's need for a package for reasonable and necessary supports.

#### **3.2 Access to supports: utilisation of plans**

It is estimated that 5 per cent of Australia's population do not speak English. It is difficult to negotiate a Service Agreement and have choice and control if you do not speak the language of the Registered Providers. Previously block-funded services included funding that could be allocated to interpreting services. That option is not available with NDIS and this is a significant barrier to some people utilising their plans.

SDN recommends that, where relevant, funding be allocated in plans for interpreting services. Alternatively, SDN recommends that free access to the Translating and Interpreting Service (TIS) be expanded to include NDIS Registered Providers.

#### **3.3 Evidence-based early intervention**

SDN believes that a drive for financial sustainability must not be disconnected from a drive for quality, effective practices.

SDN supports the need for the NDIA to have a role in regulating the quality and efficacy of early childhood interventions that can be purchased using NDIS funds. This is so that interventions continue to be based on sound evidence of effectiveness, and so that providers are required to meet at least minimum quality standards.

At a minimum we recommend harmonisation of disability service standards. We also recommend that the National Quality Framework for Early Childhood Education and Care Services and related Early Years Learning Framework and My Time, My Place be used as a starting point for quality standards for intervention services for children. These Frameworks can also be used for setting and measuring intended outcomes.

Australian Early Years Learning Framework and My Time, My Place outcomes:

- Outcome 1: Children have a strong sense of identity
- Outcome 2: Children are connected with and contribute to their world
- Outcome 3: Children have a strong sense of wellbeing
- Outcome 4: Children are confident and involved learners
- Outcome 5: Children are effective communicators

### **3.4 Early Childhood Early Intervention**

SDN commends the NDIA on the addition of Early Childhood Early Intervention (ECEI) to the NDIS model.

The ECEI approach has the potential to ensure that those children with the highest need enter the NDIS while still providing appropriate information and referral services to families with children who have lesser needs. It has the potential to be an important gateway for families, opening up pathways for them with options based on their goals and resources, and preventing children from entering a specialist system too early or when not needed.

However, SDN makes the following recommendations for the effectiveness of ECEI:

- that a systemic approach be taken, with the NDIA working with states and territories to facilitate development of formal communication and referral protocols between ECEI and critical services such as health, education, child protection, and child care to support integration of ECEI into the early years' system
- that ECEI providers have expertise in understanding typical and atypical child development; in family systems and ecology; and in understanding the complex context of mainstream and specialist early years' systems in which ECEI will operate and the enablers of and barriers to inclusion
- that a clear logic be developed for ECEI that identifies the specific inputs, outputs and outcomes that can realistically be delivered given the short-term nature of the model and the funding available. SDN recommends that ECEI short-term interventions ('light touch') be targeted towards supporting families and carers to develop clear and measurable goals and to mapping options and pathways in mainstream systems that can be followed by the family/carers over time. This means removing the expectation that measurable improvements in children's functioning be removed as a direct outcome of ECEI. It is critical that dependency on ECEI not be created.
- that a consistent national approach be developed collaboratively with ECEI providers. Providers should be treated as equal partners in designing and trialling improvements, in bringing issues forward and solving delivery problems. This will need to be an iterative process. SDN recommends that the NDIA look to the model of the NSW Inclusion and

Professional Support Programme Alliance and the National Support Agency Alliance that was part of the (now ended) Department of Education and Training funded Inclusion and Professional Support Programme.

- that PEDICAT be replaced by a more relevant and useful tool for children aged 0-6 (for example, Ages and Stages Questionnaires)

SDN strongly supports the intention of the NDIS to meet people's disability support needs, not to replace other mainstream services (Issues Paper, p.15).

SDN believes that high quality early childhood education programs lead by university qualified teachers are critical to a sustainable early childhood intervention system. The early education and child care system could be leveraged further to meet the needs of participants and to reduce long-term scheme costs. This would require ensuring that early education and child care services have equitable access to transdisciplinary advisory teams that could be attached to the ECEI provider. This would contribute to sustainability to reduce the negative impact on mainstream ECEC services from having multiple therapy providers wanting to advise them. (Please see next section).

### **3.5 Intersection with mainstream services**

SDN agrees that *poorly defined boundaries between the NDIS and mainstream services can raise the risk of gaps in services, duplication of services, and cost shifting (Issues Paper, p.15).*

In the case of early childhood education and care, gaps and duplication are arising between services. Advice from specialists to mainstream providers has frequently been a component of block funded Early Childhood Intervention service delivery. Organisations would typically allocate a keyworker to a mainstream service to give specialist advice (with family consent) about all the children with a disability or developmental delay in the service and would often run training and provide information.

This advice has now shifted to be an optional component of a package that a family must purchase for their child. Some families will choose to pay for their child's early education and child care service to have advice, and some will choose not to. This has meant that some early childhood education and care services receive no specialist advice, and some have multiple therapists wanting to advise on individual children that they have enrolled. Some Registered Providers and families want to utilise space at mainstream services to withdraw a child from their peers for a therapy session, which can contravene the mainstream service's inclusive practices and create issues regarding child protection policies and insurance liabilities.

The impact on early education and child care services has been significant in some instances and has the potential to harden attitudes in a sector with high regulation and small margins.

Some good work has been done to develop tools to support the early education and child care sector but more needs to be done.

SDN recommends that the NDIA, ECEI providers and the ECEC sector (potentially through the National Inclusion Support Programme) work closely to develop an effective, integrated system where ECEC services have inclusion support and specialist advice.

### **3.6 Workforce and costs**

SDN agrees that the full roll-out of the NDIS will require significant expansion in the workforce.

Evidence of best practice tells us that work with young children requires a professional, qualified transdisciplinary team. This workforce requires specialist disciplinary skills, commitment to working using a transdisciplinary approach, skills in working with and through families, and commitment to working collaboratively with other early years' professionals and agencies. These professionals expect remuneration and conditions commensurate with skills and experience, and in-service training and professional supervision. The current prices set by the NDIA are not at a level that can sustain this professional workforce.

## **4. Concluding remarks**

Overall, SDN commends the NDIS' approach to early childhood intervention over the past 12 months. This is because fundamental cognitive and non-cognitive skills are produced in the early years of childhood (Heckman and Masterov, 2007). For some children, the family environment may have been less than optimal for development and they present with delays that can be mitigated with quality early childhood intervention. Because of this, SDN was very encouraged that the ECEI Partners in the Community Programme was designed in line with national guidelines on best practice early childhood intervention (Early Childhood Intervention Australia, 2016).

However, it is critical that the Commonwealth and the NDIS recognise that effective early childhood intervention will require a realistic financial investment to ensure its success. For the investment in children to be worthwhile, funding to provide ECEI services must be commensurate with the functions required to deliver best practice services. Currently ECEI service providers are being asked to deliver too much given the funding envelope. Unfortunately, this may impact services – resulting in the ECEI programme not being delivered in line with best practice.

The return on investment of adequately funding ECEI services will mean that less children will enter the scheme or require long-term supports. This will also mitigate the risk of secondary handicaps, family breakdowns and mental illnesses associated with caring for someone that requires long-term support. Put simply, the opportunity cost of not investing adequately in early intervention services is that children may end up requiring formal funded supports from the scheme for much longer than if the early intervention was successful.

Finally, SDN has seen a number of improvements in scheme design and delivery over the past two years, and there are a number of aspects that can and should continue to improve as the scheme rollouts. This includes ensuring that those with English language needs can effectively access supports once a plan is approved; further refining the outcomes frameworks and the use of tools such as PEDICAT which underpin early childhood intervention; ensuring a true national ECEI approach is delivered by fostering collaborating between the NDIS and ECEI providers; and further strengthening capacity building of mainstream ECEC services to ensure they are able to effectively support children with additional needs.