



## **Response to the Productivity Commission**

### **Position Paper on NDIS Costs**

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*right from the start*

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## Introduction

ECIA VIC/TAS congratulates the Productivity Commission on the extensive work undertaken to produce the Position Paper on NDIS Costs. We welcome the opportunity to provide further input and ask that this paper be read in conjunction with our initial submission to the inquiry lodged 31 March 2017 (Submission number 129).

ECIA Victoria/Tasmania Limited (ECIA VIC/TAS) is the peak body for early childhood intervention in Victoria and Tasmania. We represent over 600 professionals and organisations providing specialised support and services for infants and young children with disability and/or developmental delay to promote development, well-being and community participation. Our vision is for young children of all abilities to fully participate in family and community life. We provide information and professional development across the sector.

ECIA VIC/TAS members are early childhood intervention (ECI) professionals working in community organisations, disability services, specialist ECI organisations, children's services agencies and government departments reflecting the diverse ways in which these services are provided to young children and their families. Our members implement a best practice approach to early childhood intervention which is outlined in the *National Guidelines for Best Practice in Early Childhood Intervention* (ECIA 2016). A brief overview of ECI best practice is provided on page 8.

This response will focus on the draft recommendations and information requests in the Position Paper that are of principal concern to ECIA VIC/TAS members and in particular relate to the NDIS ECEI approach for children aged 0-6 years.

## Response to draft recommendations and information requests

### **Information request 3.1: *The advantages and disadvantages of maintaining 'List D – Permanent Impairment/Early Intervention, Under 7 years – No Further Assessment Required'***

ECIA VIC/TAS believes that the advantages of maintaining List D outweigh the disadvantages. It is vital that children with permanent impairment are able to receive the supports they need early. Many of these children will have received early diagnoses and it would be unnecessarily stressful to subject them and their families to further assessment. Prompt and straightforward access to the NDIS will deliver the best health, well-being and development outcomes for these young children and their families.

### **Information request 4.1: *Is the NDIS ACT 2013 sufficiently clear about how or whether the 'reasonable and necessary criterion should be applied?***

There may be unintended and negative consequences for individual participants arising from legislation that is too prescriptive in relation to the 'reasonable and necessary' criterion. ECIA VIC/TAS recommends training and clearer guidelines (including examples) be provided for NDIS, LAC and ECEI staff – particularly for planners. For example, it is essential that planners view

travel as a “reasonable and necessary cost” when working with children aged 0-6 years to enable the delivery of supports in the child’s natural environment (refer to the ECI Best Practice overview on page 8). It is also “reasonable and necessary” to incorporate interpreting costs into plans and budgets for CALD families to enable services and supports to be put in place.

**Information request 4.2: Should the National Disability Insurance Agency have the ability to delegate plan approval functions to Local Area Coordinators?**

Under the ECEI approach, plans for children aged 0-6 years are developed by specialist Early Childhood Partners. ECIA VIC/TAS recommends that plan approval also be located with the Early Childhood Partner as they will be best placed to work with families to identify the particular support needs of their children. It is also essential to provide an opportunity for the child’s family to review the plan prior to approval as stated in Annex E to the Statement of Requirements Early Childhood Early Intervention Services 7.4.7 (d). ECIA VIC/TAS also recommends that Early Childhood Partners draw on the knowledge of ECI sector professionals to assist in the development of the most appropriate plans for children.

**DRAFT Recommendation 4.1: The National Disability Insurance Agency should:**

- **implement a process for allowing minor amendments or adjustments to plans without triggering a full plan review**
- **review its protocols relating to how phone planning is used**
- **provide clear, comprehensive and up-to-date information about how the planning process operates, what to expect during the planning process, and participants’ rights and options**
- **ensure that Local Area Coordinators are on the ground six months before the scheme is rolled out in an area and are engaging in pre-planning with participants.**

ECIA VIC/TAS supports all recommendations under 4.1. Simplifying the review process for minor amendments will reduce costs and minimise delays for participants accessing services and supports. In addition, we believe that phone planning is inappropriate for use with young children and families and recommend that plans be developed collaboratively by Early Childhood Partners during face-to-face meetings at a time and location to suit the family. Comprehensive, clear and current information about NDIS processes, participant’s rights and options should be provided as early as possible. Both LACs and Early Childhood Partners should be on the ground 6 months prior to scheme roll-out in each location.

**DRAFT Recommendation 4.2: The National Disability Insurance Agency should ensure that planners have a general understanding about different types of disability.**

Under the ECEI approach Early Childhood Partners are the first point of contact for young children and families and work collaboratively with them to develop plans for children. They were to be “suitably experienced and qualified organisations with strong local knowledge and understanding of the needs of children and their families to deliver the ECEI Services” (NDIS ECEI website). Currently, there is no uniform understanding of what constitutes best practice early childhood intervention for ECEI Partners. Additionally, ECEI Partners have been appointed from out of area and have limited knowledge of local supports and services for children and families.

To increase the ability of Early Childhood Partners to provide appropriate support to children and families ECIA VIC/TAS recommends establishing a process to enable them to draw on the ECI sector’s extensive knowledge of:

- a) best practice ECI and
- b) local area supports and services

Additionally, ECIA VIC/TAS recommends mandatory training in best practice ECI (particularly in relation to family-centred practice and the key worker model) for all Early Childhood Partners, NDIA and LAC staff, specifically planners. This training should be based on the *National Guidelines for Best Practice Early Childhood Intervention* (ECIA 2016). ECIA VIC/TAS has also developed best practice ECI training modules which can be tailored for delivery to key staff.

**DRAFT Recommendations 5.1: Increase funding to the ILC to full scheme roll-out costs (\$131m) each year of transition.**

**DRAFT Recommendations 5.2: The Australian, State and Territories Governments should make public the supports and services provided beyond the NDIS; and the NDIA should identify service gaps and actions to address barriers to accessing disability and mainstream services for people with disability.**

**DRAFT Recommendations 5.3: COAG Councils should have a standing agenda item to address provision of services and interface with NDIS including service gaps; National Agreements and National Partnership Agreements should include specific commitments and reporting obligations.**

ECIA VIC/TAS supports recommendations 5.1, 5.2 and 5.3. Additionally, we support the VCOSS recommendation to increase the amount of ILC funding beyond full scheme roll-out of \$131m to a percentage of the NDIS budget.

**Draft Recommendation 6.1 Independent Price Monitor to Regulate Scheme Supports and recommend when to deregulate**

**Draft Information Request 6.1: Meeting the needs of participants in thin markets**

ECIA VIC/TAS believes a variety of responses will be required to meet the needs of thin markets. Further assessment will also be required to establish the location and type of need. We are particularly concerned about the limited availability of early childhood intervention services in rural and regional areas of Victoria and Tasmania and in high growth metropolitan corridors, particularly in outer Melbourne. This limits choice for families. Accordingly, we recommend:

- the costs of service provision in rural, regional and high growth areas are reviewed and revised to ensure ECI delivery.
- ECIA VIC/TAS undertakes a needs assessment to identify areas in Victoria and Tasmania with no or limited ECI service provision.
- ECIA VIC/TAS is funded to provide an outreach support program connecting areas of need with best practice ECI service providers.

**Draft Information Request 6.2: What changes would be necessary to encourage a greater supply of disability supports over the transition period?**

In a service environment where viability is challenged, there is a market risk that choice will be limited as organisations merge, fold or are acquired. This dynamic is particularly acute in regional Victoria and Tasmania, where there are already limited support options.

Delivering early childhood intervention using an individual therapy support line item can adversely affect the delivery of ECI best practice, particularly when ECI professionals are unable to provide a key worker/transdisciplinary model to support the child and family in their natural environments (refer to ECI Best Practice Overview, page 8).

ECIA VIC/TAS recommends that further work be undertaken to assess the unit price for early childhood supports including the provision of:

- the key worker/transdisciplinary model
- travel costs to support children in their natural environments
- cancellation policies that are realistic when working with children
- access and participation for children and families needing additional support – including interpreters
- support for families waiting for services

Setting an appropriate price for early childhood supports will ensure that when the market is deregulated:

- there are enough ECI providers to bring down cost pressures through competition and
- the goal of ‘choice and control’ for families can be realised.

**Information request 7.1: What is the best way for governments and the National Disability Insurance Agency to work together to develop a holistic workforce strategy?**

ECI professionals committed to the delivery of best practice for children and families are anxious that this might not be realized under the new ECEI model. They are concerned that working in a diminished model will lead to an exodus of staff from services. It is essential that current issues relating to NDIS ECEI policy, funding and practice be addressed as a matter of urgency to retain the existing highly skilled, professional ECI workforce and attract new committed staff. For the future ECI workforce there are also issues around training and recruitment that will need to be addressed including the need to:

- work with universities to progress teaching at the undergraduate level to enable graduates to deliver best practice
- provide placements for students when many small services are unable to do so
- undertake and fund Professional Development training

**DRAFT Recommendation 7.2: The National Disability Insurance Agency should publish more detailed market position statements.**

It is difficult for service providers to plan for the longer term and commit to investment in an uncertain and changing environment. This is currently exacerbated by poor communication and an inadequate flow of information and data. ECIA VIC/TAS supports the publication of more detailed data and information to assist providers to better plan and invest for the future. Additionally, we recommend improving collaboration and communication pathways between all parties working to deliver the NDIS ECEI approach by putting in place a working group with members from all organisations involved in delivering the ECEI approach.

**Information request 8.1: Is support coordination being appropriately targeted to meet the aims for which it was designed?**

There has been a lack of clarity and guidance around the function, allocation and use of support coordination funding and a wide variation in the quality of the support provided. Under the ECEI there has also been some confusion that support coordination and the key worker model fulfil the same role though this is not the case. Under best practice early childhood intervention, a key worker fulfils a number of functions including providing therapeutic support and linking the team (ECI and other professionals and family) around the child. ECIA VIC/TAS believes that better guidance and communication between all parties is essential to ensure support coordination is used appropriately.

**Information request 9.1 The Commission is seeking feedback on the most effective way to operationalise slowing down the rollout of the National Disability Insurance Scheme.**

ECIA VIC/TAS does not support delaying access to the NDIS for those who need it. Slowing down the rollout of the NDIS will have adverse impacts for young children with disability and developmental delay and their families. Identifying issues and providing supports and services as early as possible in a child's life ensures the best health, development and well-being outcomes. Where the best practice early childhood intervention approach is working well, this will also lead to cost savings over time.

However, in order for the NDIS ECEI approach to be most effective for children and families ECIA VIC/TAS recommends that Early Childhood Partners be in place six months prior to Scheme roll-out in each location and that planners and registered providers/services are prepared and ready.

## Early Childhood Intervention best practice - overview

*Early childhood intervention (ECI) is the process of providing specialized support and services for infants and young children with disability and/or developmental delay and their families, in order to promote development, well-being and community participation. (ECIA 2016)*

The primary focus of high quality early childhood intervention is to optimise a child's learning and development and their capacity to participate meaningfully in family and community life. To achieve the best possible outcomes for children aged 0-6 years in the NDIS, a best practice approach to the delivery of early childhood intervention services is essential. It is critical that this best practice approach is clearly articulated, universally understood and fully funded.

Many children and families using early childhood intervention services have multiple needs, requiring the expertise of professionals from multiple disciplines. For such families, best practice in ECI involves the delivery of services through a single professional or key worker, with the collaborative support of an appropriately knowledgeable and professional team. The key worker provides therapeutic support and links the team around the child.

Services are provided in the child's natural environment – at home, in daily routines, in the community, in early childhood education and care settings. Using best practice principles, ECI professionals build the capacity of the child, their family, professionals, including early childhood educators and others in the community to facilitate inclusion in daily life and maximise the child's learning and development. ECI professionals work respectfully with families from diverse backgrounds to achieve the outcomes they want for their child and family.

This approach to best practice ECI is based on extensive consultation within the ECI sector and on Australian and International research literature and is detailed in the National Guidelines for Best Practice in Early Childhood Intervention (ECIA 2016). In Victoria, these principles have been well understood and supported by the State Government through the Department of Education and Training. It is essential that this important work in best practice ECI is maintained and funded into the future.

## References

Early Childhood Intervention Australia (2016). *The National guidelines for best practice in early childhood intervention*, February 2016. Available at: [ecia.org.au/resources/best-practice-guidelines/national-guidelines-for-best-practice](http://ecia.org.au/resources/best-practice-guidelines/national-guidelines-for-best-practice)

NDIS ECEI website: [ndis.gov.au/ecei](http://ndis.gov.au/ecei)