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## **Submission - Independent assessments and access**

### **About Illawarra Disability Alliance**

The Illawarra Disability Alliance (IDA) is a group of not for profit disability-specific providers working together collegially and collaboratively to deliver better outcomes for people with disability in the local community.

IDA members recognise that the NDIS provides invaluable supports for many people with disability. IDA members met recently to discuss the impacts of introducing the Access and Eligibility Policy with independent assessments and welcomes the opportunity to provide a response. IDA members make a number of recommendations which focus on ensuring the independent assessment process produces fair outcomes for participants, minimises disruption and trauma for vulnerable people with disability, and enables the NDIS to remain sustainable.

### **General comments**

The Illawarra Disability Alliance appreciates that assessments are necessary to understand the level of supports needed for a person with disability. However, the IDA are concerned that the planned changes do not replace or improve existing assessment processes but adds to the list of demands a person with disability is required to undertake in order to access the Scheme. The planned changes have neglected to consider the impact on the mental wellbeing of people with disability, as well as their families, who are already subjected to lengthy processes to produce evidence of their disability or disabilities.

While the IDA supports measures to embed a standardised assessment framework, the design and approach of the planned changes has the potential to fundamentally alter the way in which people with disability access the NDIS, their plans, and funding. In order to achieve a balance between standardised assessments with consideration for individualised support needs, the IDA strongly recommends the independent assessment policy be genuinely co-designed with people with disability and stakeholder groups, thoroughly tested, and independently evaluated before implementation.

## Person-centred practices

The NDIS is underpinned with an ethos of choice and control for people with disability to address the systemic inequalities faced by those who have limited support networks. The IDA recognises consistency is essential to fair decision-making for NDIS eligibility, however, we are concerned that the proposed independent assessment model does not address these inadequacies but rather adds an extra layer of complexity to a system which is already difficult to navigate.

IDA members are concerned the planned changes depart from person-centred practices, removing choice and control over who conducts an independent assessment. For many participants, accessing support and going through assessment procedures can be a traumatic experience. Many have suffered trauma from accidents, engagement with healthcare systems, trauma from childhood, institutionalised trauma and trauma from misdiagnosis. Having to engage with someone new to provide self-rated answers to a list of clinical questions oriented around what a person can and cannot do could cause further distress and negatively impact on a participant's wellbeing.

Furthermore, there are concerns that independent assessors will not have appropriate levels of knowledge for the diversity of disabilities and the nuances for participants and their families. A three-hour interview is not a sufficient amount of time to gain a comprehensive enough understanding of a person's functional capacity to determine how much support the person will receive through the NDIS. This process also lacks transparency as participants are not able to appeal the outcome of the independent assessment and are not provided with the full report unless they request it. This could potentially leave many people further traumatised and without adequate support.

### Recommendations:

- The IDA recommends that assessments be carried out by a health professional who is currently working with a participant using standardised tools identified by the NDIS to provide a clear picture of a person's functional capacity. This will facilitate a fairer and more accurate assessment process which minimises additional stress to participants, achieves consistency for the NDIS, and addresses potential conflicts of interest of independent assessors being appointed by the NDIA.
- If independent assessors are appointed by the NDIA, a transparent process must be used for the selection of independent assessment organisations.
- Independent assessors must be trained with specialist skills and knowledge to understand specific disabilities.
- Independent assessors must be trained with specialist skills and knowledge to understand diversity issues such as age, gender, and unique issues for First Nations participants, Culturally or Linguistically Diverse (CALD) backgrounds and LGBTIQ+ communities.
- Communication with participants on the assessment process and outcomes to be transparent and easy to understand.

## Implementation timelines

The Access and Eligibility Policy with independent assessments is due to come into effect in the middle of 2021 for all applicants over 7 years of age. This timeline overlaps with the completion of the pilot program which aims to complete 4000 assessments by mid-2021. The concurrent timelines of conducting the pilot while simultaneously introducing a new policy is highly problematic and does not allow for the policy to be informed by the findings of the pilot program.

Furthermore, the pilot does not encompass a true end-to-end process of how the independent assessments will ultimately impact a participant's plan budget, their user experience in utilising their plan and the subsequent flow on impact to providers and the industry. Whilst the pilot is focused on testing independent assessment tools with a sample of participants and capturing their feedback on the experience of the initial assessment process and validity of the tool, there is very little transparency on how the independent assessments are impacting on plan values and how they compare to current plans.

The pilot review paper establishes clear problems surrounding the current discrepancies in participant plan budgets and the rapidly inflating plan values over the last four years. The data from the pilot findings, however, is unclear on the longer-term effects of this new independent assessment process. The pilot review paper loosely refers to the usefulness of independent assessments noting that plan values after the assessments more closely aligned with reference packages (levels of funding set for reference groups that consider characteristics of disability type and functional capacity). However, clear data or comparisons on current plan budgets to demonstrate what percentage of budgets increased, decreased, or stayed the same, has not been provided.

The ongoing evaluation plans for the next stages of the pilot in coming months are focused on upfront assessment and move straight into implementation of independent assessments without consideration of the operationalisation of this new process and longer-term impact to participant plan funding. Without this, given the significance of such a fundamental change to the planning process, it poses a potentially dangerous situation for the sector to find themselves simultaneously learning and experiencing the implications of this change.

The planned changes are significant and will fundamentally change how participants receive their NDIS plan and funding. The IDA understands the need for a structured assessment framework, however, the changes must be subject to rigorous and independent evaluation before being implemented.

### Recommendations:

- In order to preserve a level of trust in the validity of the assessment process amongst NDIS participants, their families, as well as providers, the IDA strongly recommends for the implementation of the Access and Eligibility Policy with independent assessments to be suspended until the pilot programs have been completed, including a full independent analysis of the pilot programs, and report providing an end-to-end view of the planned changes.

- Revision of implementation timelines of the Access and Eligibility Policy with independent assessments to allow thorough and genuine co-design to be conducted, informed by findings from the pilot programs, and substantiated with quality data.
- Provision of greater transparency and opportunities for honest conversation with providers around pricing and assessment.

## Impact on the sector

Under the Access and Eligibility Policy with independent assessments, all NDIS applicants will be required to provide advice from their treating health professionals as to whether their impairment or impairments are, or are likely to be, permanent. If deemed eligible, participants are then required to complete an independent assessment. Wait times for specialist health professionals can already take up to 8 months. The introduction of the independent assessment will not only add time to gaining access to the Scheme for participants but will also put added pressure on the availability of allied health professionals, impact on existing waitlists and cause further delay for individuals seeking treatment.

Additionally, the proposed independent assessment model is estimated to have a significant cost to the NDIS. Within the next five years, the NDIS will provide support to an estimated 500,000 Australians living with a permanent and significant disability. The cost implication for conducting independent assessments for all NDIS participants could total over \$319 million.

The Illawarra Disability Alliance is supportive of a standardised assessment framework, however, is concerned the proposed approach to independent assessments will not result in fairer and more consistent decision-making for NDIS eligibility and are instead motivated by pricing concerns related to the cost of the Scheme. The planned changes are fundamental to the design of the NDIS and not only leaves people with disability in danger of being left without the essential supports they need, but could also be detrimental to the Scheme itself.

Yours sincerely,



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For and on behalf of The Illawarra Disability Alliance

Members of the Illawarra Disability Alliance

