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via email: kelvin.king@ndis.gov.au

Re: NDIS Consultation paper - Planning Policy for Personalised Budgets and Plan Flexibility

Thank you for the opportunity to provide a written response to the Consultation paper: Planning Policy for Personalised Budgets and Plan Flexibility.

AnglicareSA supports approximately 65,000 South Australians annually, and provides NDIS funded individualised, group and supported accommodation services to more than 1,200 children, young people and adults living with disability.

The following feedback is based on the content of the paper.

3.6.1 Release of funds

AnglicareSA questions the benefit of incremental release of funding and whether this would have flexibility of usage through the plan. Given the challenges existing with 12-month plans, having any funding arrangement that is shorter than this, for whatever reason, will impact provider cash flow, administrative burdens and service or support disruptions. Our organisation would welcome any further clarification or discussion on how this might operate in a practical sense.

3.5 Flexible and fixed budgets

AnglicareSA believes that while there is strength with greater flexibility, it risks further ambiguity for customers on how to use their funds. There is no structure around elements of funding and customers can use it for anything at all. This will lead to confusion and customers not knowing what service to choose.

This may be an appropriate option for some specific customers in some specific areas of support where a unique situation supports it. However, there are already issues around fraud and misuse of customer transport funding and not enough in the sector currently that enables objective, independent, supported decision-making approaches that would be critically needed for this type of approach.

Flexible budgets also increase the risk of exploitation, including providers booking larger portions of funding. AnglicareSA is aware of supported residential facilities charging customers 75 percent of their Disability Support Pension for residency in the facility while also claiming the entire core budget - not quoted against actual individual service. There is not enough accountability on use of funds for service. This is always worse when customers engage non-registered providers.

With the increased opportunities for providers to take advantage of customer funds in such ways, it is imperative that measures are put in place to safeguard all customers.