



INTERMEDIARIES WITHIN THE DISABILITY SUPPORT SYSTEM

A WHITE PAPER SUBMISSION TO THE NDIS
REVIEW ON THE CURRENT AND FUTURE ROLE
INTERMEDIARY SERVICES MUST PLAY WITHIN
THE AUSTRALIAN DISABILITY SUPPORT SYSTEM

ACKNOWLEDGEMENT OF RIGHTS OF PEOPLE WITH A DISABILITY

Disability Intermediaries Australia acknowledges the objectives of the United Nations Convention on the Rights of Persons with Disabilities which affirms that all persons with all types of disabilities must enjoy all human rights and fundamental freedoms. DIA embraces this Convention as we continue to support choice and control for all Australians with a disability.

ACKNOWLEDGEMENT OF COUNTRY

Disability Intermediaries Australia respectfully acknowledges Australia's Aboriginal and Torres Strait Islander communities and their rich culture. DIA pays our respect to their Elders past, present and emerging. We acknowledge Aboriginal and Torres Strait Islander peoples as Australia's first peoples and as the Traditional Owners and custodians of the land and water on which we rely.

We recognise and value the ongoing contribution of Aboriginal and Torres Strait Islander peoples and communities bring to Australian life and how this enriches us. We embrace the spirit of reconciliation, working towards the equality of outcomes and ensuring an equal voice.

SUBMISSION BY

Disability Intermediaries Australia Limited.

CONTACT

Mr Jess Harper
Chief Executive Officer
+61 421 244 824
jess.harper@intermediaries.org.au

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FOREWORD

Disability Intermediaries Australia (DIA) welcomes this opportunity to provide information and respond to the NDIS Review request for submission. Our response is evidenced based, drawing on market led insights from our extensive member network and market driven research.

A well-functioning market of supports and services is one of the foundational pillars of the NDIS. It is critical to realising the vision of the NDIS, whereby people with disability are living independent yet connected lives and empowered through having choice and control over the supports they engage.

DIA are thought leaders in understanding and building Intermediaries (Support Coordination and Plan Management) role and function within the market. At their core, Intermediaries support participants to navigate, guide, capacity build and make self-directed decisions whilst overseeing and monitoring Participant service providers.

Since its establishment DIA has developed into an established, data driven and evidence-based industry peak body, with a focus on developing and stewarding the intermediaries' market forward, to increase quality and outcomes for people with a disability.

ABOUT DISABILITY INTERMEDIARIES AUSTRALIA

Formed in late 2018, DIA is Australia's peak body for non-government disability intermediary service organisations and practitioners. Collectively, DIA members deliver Support Coordination and Plan Management services for Australians with all types of disability. DIA members deliver Support Coordination and Plan Management services to more than half of all NDIS Participants.

DIA continues to highlight the benefits and the practical outcomes that Plan Management and Support Coordination deliver to people with a disability. These include greater choice, increased control, supported decision making and strengthened self-direction.

These benefits result in Participants being able to maximise the benefit from the NDIS funds they receive, in turn driving increased effectiveness and efficiency.

DIA is the first disability peak body to have successfully implemented Professional Standards of Practice to establish a quality service model for the market we represent. Whilst DIA is exceptionally proud to have delivered on this first stage of work there is more to be done. DIA is pleased on its progress through or second stage of market shaping and stewardship work – Accreditation.

DIA is continuing to transform the regulatory standards approach within the sector through developing guidance, tools and resources to further increase sector standard and quality. This transformation approach will focus on enhancing our collaborative relationships with both government and industry stakeholders.

DIA members represent around 70 per cent market share of the Support Coordination and Plan Management markets. As the NDIS continues to make intermediary services better suited to the self-determination goals of people with disability, DIA will be an active voice for support and reform to intermediary products so that they are more reputable, resilient and viable.



THIS SUBMISSION

This submission to the NDIS Review provides key insights and information into the operational environment of Intermediaries within the NDIS.

DIA has created this submission utilising data from a number of sources, listed below, this is due to the depth of analysis conducted by DIA, which is not possible to achieve from a single data source.

The data collected from these sources contains 2,761,159 individual data points.

DATA SOURCES AND COVERAGE

The data forms a position to understand the various service structures and offerings nationally.

The collection and analysis of data has focused on operating environments for both Plan Management and Support Coordination.

DIA has utilised and developed this report with the 'most standard' information available.

Information has been collected directly from providers, directly from the National Disability Insurance Agency or is publicly available information.

Data sources for this report include:

Publicly Available Data

- DS1. National Disability Insurance Agency - Quarterly Reports to Disability Ministers, retrieved from [ndis.gov.au](https://www.ndis.gov.au);
- DS2. National Disability Insurance Agency – Publicly Available Data and Insights, retrieved from [ndis.gov.au](https://www.ndis.gov.au);
- DS3. Australian Bureau of Statistics – Disability, Ageing and Carers Australia, retrieved from [abs.gov.au](https://www.abs.gov.au);
- DS4. Australian Bureau of Statistics – Population and Federal Electorate data, retrieved from [abs.gov.au](https://www.abs.gov.au) ; and

DS5. Department of Social Services – NDIS Demand Map, retrieved from blcw.dss.gov.au.

DS6. Minister for NDIS - Response to Joint Standing Committee on the NDIS, MC21-005568;

Freedom of Information Requests

DS7. 12 individual Freedom of Information requests from March 2022 to April 2023.

Direct Sourced Data

DS8. National Disability Insurance Agency - Data provided to DIA directly from by the NDIA. DS-1740 ER22001.

Provider Supplied Data

DIA invited both its members as well as non-member Plan Management and Support Coordination providers from the Intermediary sector to participate in its benchmarking program and surveys.

DS9. Disability Intermediaries Australia – 2023 Benchmarking and State of the Sector Program. This program could be completed via an online survey platform, via return email or in 1 on 1 sessions. DIA collected information from 965 unique submissions (511 Plan Management and 454 Support Coordination Submissions); and

DS10. Disability Intermediaries Australia – 2021-22 State of The Sector Survey. This survey could be completed via an online survey platform, via return email or in 1 on 1 sessions. DIA collected information from 785 unique submissions (401 Plan Management and 385 Support Coordination Submissions); and

DS11. Disability Intermediaries Australia – 2022-23 Annual Price Review: Pricing and Cost Model Survey. This survey could be completed via an online survey platform, via return email or in 1 on 1 sessions. DIA collected information from 808 unique submissions (430 Plan

Management and 378
Support Coordination
Submissions).

DS12. Disability Intermediaries
Australia – 2022 Why do you
Plan Manage your NDIS
Funds Survey. DIA collected
information from 3016
unique submissions (1502
Participants, 1001 Carers and
503 Legal Decision Makers).

DS13. 2020 Sector Report Disability
Intermediaries Australia
utilised the data collected
from 461 individual
submissions from
intermediary providers.

Participant Supplied Data

DIA invited participants, carers and
legal decision makers to share their
reasons for engaging a Plan
Manager to manage their NDIS
funds.

DS14. Disability Intermediaries
Australia – 2023 Why do you
Plan Manage your NDIS
Funds Survey. DIA collected
information from 4289
unique submissions (2236
Participants, 1502 Carers and
551 Legal Decision Makers).

“The Plan Manager I use, helps me to understand the endless rules the NDIS has, you can buy this, that is an ‘everyday item’ so the NDIS does not fund that.

I couldn’t manage without my Plan Manager”.

*Paul
Participant
New South Wales*



RECOGNISING THE NDIS CHALLENGES

The scope, scale and timeframe for establishment of the NDIS supports market has been particularly complicated.

This broad market of supports must cover all types of disability and enormous geographical spread, as well as other types of diversity (e.g. culturally and linguistically diverse communities and people experiencing poverty).

These challenges in the broad NDIS market are becoming more evident as the NDIS reaches 10 years in operation.

The NDIS has come a long way for a lot of Participants the NDIS has positively changed they lives. Recent improvements have been welcomed, however some participants and their families are still reporting they are experiencing challenges accessing the NDIS, implementing their plan, maintaining and/or building capacity and are struggling to

navigate the Scheme (JSC, 2018; DIA, 2020; IAC, Jul 2019; DIA, 2023; Commonwealth Ombudsman, 2018; Bartnik, Eddie; Broad, Ralph, 2021).

Providers in many areas of the NDIS report they continue to struggle to: keep up with NDIS change cycle, maintain financial viability and meet administrative requirements all while delivering quality services.

This has led to market segment volatility and a steady pace of market exit for certain services (*Mathys, Z & Randall, K, 2019; DIA, 2020; IAC, Oct 2019; DIA, 2020*).

Some of these challenges are due to less-than-ideal implementation and transition of the Scheme, which is not unsurprising given the scale of this reform.

However, DIA contends that many of the challenges faced by the NDIS today are arising because of previous NDIS oversight's narrow view of the Disability Support's market which has not evolved with the service provision offered by the market. This view is grounded in evidence from Australia and overseas, as well as DIA's own market view and experience.

Across the spectrum of market-based social insurance schemes and human services (e.g. VET, WorkSafe, Transport and Accident Insurance and Aged Care) it is evident that for people with multiple and often overlapping needs, a market based approach without a trusted and skilled Service / Support Coordinator working for and on behalf of a participant, is neither an effective nor an efficient means of service delivery (Muir & Salignac, 2017; Olney, 2016; Slasberg & Beresford, 2016; Yu & Oliver, 2015; Considine, Lewis, & O'Sullivan, 2011; Carey, Malbon, Reeders, Kavanagh, & Llewellyn, 2017; Considine M., 2022; DIA, 2021; DIA, 2022; DIA, 2023).

For many people, the complexity of navigating and negotiating their way to quality services can be an overwhelming burden (Dommers, Myconos, Swain, Yung, & Clarke, 2017; Needham, 2018; Considine M., 2022; Bartnik, Eddie; Broad, Ralph, 2021; Tune, 2019).

Yet despite this, public policy continues to overestimate the capabilities that people possess to navigate markets, and underestimate the capability required of both government and providers, to ensure markets truly address the needs of all people.

Predictably, this pattern is playing out in the NDIS: many people with more complex support needs, culturally and linguistically diverse community and those from low socioeconomic background are disproportionately struggling to have their needs met in the NDIS marketplace when not funded with Support Coordination (Hui, Cortesse, Nikidehaghani, Chapple, & McCombie, 2018; JSC, 2018; Productivity Commission, 2017; DIA, 2020; Tune, 2019; IAC, Oct 2019; DIA, 2022; DIA, 2023).

The NDIS has all of the necessary elements to be successful, but at present there is a risk of continuing the status quo: if the only supports and services available to purchase are the same ones that people and families have criticised for being inadequate and not person-centred, then no amount of resourcing will make a meaningful difference to the quality of a person's life and/or social and economic participation.

Consultation and feedback also suggest that funded support coordination in plans is critical to help participants reduce the burden of managing their plan and enable them to maximise the benefits of their funding.

In some cases, it was suggested the NDIA should fund this support more generally for NDIS participants. *(Tune, 2019)*

There are many ways to organise and deliver disability services, something that Australia has been trying for over 50 years to get right. We cannot forget that as far back as 1972 the ideal of a national disability scheme to address the needs of those with a disability was a magnet for ambitious reform.

Prime minister Gough Whitlam commissioned an inquiry into a national compensation scheme, headed by New Zealand judge Owen Woodhouse, who proposed a scheme to draw together all the systems for supporting people with injuries, illnesses and disabilities *(Considine M., 2022)*.

51 years on and the NDIS still struggles to determine who is eligible and able benefit from the NDIS and those who are not.

Participants and supporters of the NDIS continue to seek greater choice and control, more flexible funding that supports Participant dignity of risk, innovation in service

design and delivery, and a quality service system based upon need and not upon the lottery of location.

With the commencement of the NDIS review there has been a repeated narrative that the supports market has not developed as intended “...*plan management and support coordination are not always playing the roles that were intended*”.

Whilst DIA and the sector must own our truth and has been taking proactive steps to increase quality and professionalisation, the NDIS Review must recognise that the roles Plan Management Providers and Support Coordinators are currently playing are a direct result of NDIA and NDIS Commission policy and price settings.

Whilst this might be slightly different to as intended back in 2013-2016, the market has developed as intended since, i.e. in line with the policy and pricing settings set by the Commonwealth.

To date outside of DIA’s professional standards of practice the NDIS has not developed a framework for the delivery of intermediary services

and continue to only deliver minimal operational policy on the fly, that rarely addresses the market or Participant need.

The NDIA has been publishing statements since 2018 that the quality of Plan Management and Support Coordination services is highly variable (NDIA, 2020; NDIA, 2018; NDIA, 2021; NDIA, 2018; NDIA, 2021, 2022, 2023).

DIA notes that NDIA Partners (LACs) are precluded from operating in such a conflict however Support Coordinators and Plan Managers do not have such requirements. This has to be addressed to ensure the interests of the Participant are put above the interests of an individual service provider.

DIA has undertaken significant work within the sector to address this. The DIA Professional Standards of Practice require such independence of service, save for specific list of exceptions such as in a bespoke community settings like those seen in some Aboriginal and Torres Strait Islander communities.

This lack of strategic policy setting and market stewardship combined with continued price freezes (price cuts in real terms) for Plan Management and Support Coordination, which is now into its fourth consecutive financial year, has created a direct incentive and imperative to reduce costs to a base level to ensure viability, this has a real impact on quality.

Beyond just price limit freezes the NDIS has continued to whittle away and reduce per participant funding year on year for intermediaries.

Yet despite these statements there has been extremely limited intervention or stewardship of the market, with the NDIS Participant Service Improvement Plan Support Coordination item now having slipped by almost 3 years. DIA can't help but ask why?

For the past 5 years DIA has been calling on the NDIA and NDIS Commission to take real and meaningful steps to resolve significant conflicts of interest where a Participants Intermediary also delivers other disability supports (Core, Home and Living, AT etc).

Participant Service Improvement Plan Commitment

Expected completion

We will be clearer on what **support coordination services** we fund, and how it should be separate from other service providers

March 2024

This has been done through the implementation of soft NDIA operational policy and claiming conditions that see funding put into plans which cannot be used.

Such as Plan Management Set Up Fees not being claimable when the NDIA rolls over (Extends) a participants plan Despite the required work to establish a rolled over (extended) plan being virtually identical to that of a new plan.

This has resulted in per participant plan funding for Support Coordination and Plan Management has reduced by around 4% and 3.5% respectively in the last financial year.

Annualised payments for Support Coordination and Plan Management have also continued to decline being reduced by around 12.8% and 22.5% respectively for the last financial year.

DIA does not suggest that our sector is perfect, it's not. DIA and the sector own our truth, we recognise

areas that can be improved and work very hard to maintain and lift quality.

DIA is the only peak body within the Disability Sector that has implemented Professional Standards of Practice for its members and has developed an accreditation model for implementation in early 2024.

DIA strongly believes in a professionalised intermediary sector being one of the keys to ensuring the success of the NDIS into the future.

With this backdrop of no intermediaries framework, limited operational policy and market stewardship by the NDIA and the NDIS Commission, DIA is proud to have supported to sector to deliver the level of quality that is currently being delivered to the vast majority of NDIS Participants across Australia, whilst also continuing to develop and deliver programs to increase service quality and professionalisation.

“When stuff goes wrong, I have
someone I trust to tell. I know
my Support Coordinator is
there to help fix it”.

*Duncan
Participant
Western Australia*



MEETING THE CHALLENGES

Within the scope provided by the NDIS Review, our submission provides evidence on how the NDIS can rise to meet these challenges.

The social and economic benefits expected by the Productivity Commission in its foundational blueprint for the Scheme will not be realised unless all participants are able to access the supports they need to live an ordinary life, regardless of their disability or background (*Productivity Commission, 2011*).

DIA recognises that developing a robust, innovative and quality focused Intermediary market is a formidable task. Noting that responsibility for action is not held by the public sector alone. The aim of Intermediaries will not be fully realised unless it is embedded within a broader market quality and innovation improvement strategy that draws on the perspectives and expertise of all sectors — public, private, not-for-profit, community and participants to co-design the most effective response.

Our conclusions can be summarised as follows:

1 A quality based intermediary sector that holds the choice and control of people with a disability as its primary purpose.

- This requires investment in independent intermediary services that support people to navigate and gain the most from the market. This holds true for the majority of participants, not just the most disadvantaged or those with the most complex support needs.
- Recognition that the majority of participants require support to understand the complexity of Government services like the NDIS. We have seen the perversion of Government support, see Robo Debt, where people are unable to access an intermediary service that can question or challenge poor decisions and decision-making processes made by a Government Department.

- Participants should be able to exercise dignity of risk and try new and innovative supports within out being judged or made to feel like they have committed a crime for trying a new support or innovative practice that doesn't work.
- Recognition that a Government Agency is incapable of undertaking all of the facilitation, navigation, translation and capacity building that NDIS Participants need.

2 Effective eco system facilitation.

- Supports and services outside the NDIS do not meet the needs of many people with disability. This has resulted in inequity and the NDIS as being seen as the only option available.
- Services provided by states and territory are critical to the success of the NDIS, however service systems are fragmented and do not provide seamless connections or transitions for people with disability and NDIS participants.

- The NDIS needs to be complemented through a whole of government agreed strategy that supports investment in accessible mainstream services, consistent funding, increased integration of state and territory and federal services and those funded through the NDIS and better focused place-based supports for all people with disability.

3 High quality pricing approaches for high quality supports.

- Price regulation is extremely important to protect people from predatory pricing; however, price limits must not be a barrier to quality, flexible, innovative and responsive services.
- Pricing regulation should be transparently implemented by an independent pricing mechanism such as an Independent Pricing Authority that can consider pricing with the view of delivering increased quality and innovation not just the base cost of service.
- Funded practitioner collaborations, conferencing and supervision are critical to the

development of a quality focused service delivery market.

- A targeted, blended approach to payment reform for service areas where there is greater potential for innovation and improved outcomes that is underpinned by a range of non-payment and pricing enablers such as:
 - » Improved planning;
 - » Participant goals and outcomes not just scheme goals and outcomes;
 - » Better use of intermediary supports for navigation, capacity maintenance and building along with participant led outcomes;
 - » Better use and sharing of data; and
 - » Workforce training & support.

- Information and provider connection alone cannot drive nor ensure the quality participant outcomes; it must be coupled with support for participants to build and/or maintain capacity over the long term to develop and improve effective social, community and economic participation.

- Plan and support pathways are required to:
 - » Increase transparency of NDIA decision-making;
 - » Guide planners, participants, intermediaries and providers;
 - » Support the development of specialist planning processes to support early intervention and specific participant cohorts;
 - » Deliver tailored information and support to access services in line with participant goals, outcomes and preferences: and
 - » Empower consumers, governments and providers to understand and access evidence-based best practice.

4 A world class support pathway for a world class scheme.

- Far too often, participant plans do not meet their actual needs. Current streaming and planning processes don't adequately account for complexity or use evidence of best practice supports as a basis for decision making.

5 Quality workers to deliver outcomes in a quality scheme.

- Addressing workforce issues requires investment not only in the content, quality and accessibility of training to increase the supply of skilled workers, but also in improving the conditions of those employed in the sector.
- Development of a real plan to meet the long-term workforce needs of the NDIS, not just transferable skills and accreditation that puts Aged Care, NDIS and other schemes within the Care Economy against each other on who will pay more in any given year.
- Portable leave entitlements and training entitlements will need further cost benefit analysis to avoid perverse impacts. High workforce turnover currently being experienced by the sector impacts worker oncosts and continuity of support for participants.
- Workforce retention remains an issue within the sector.
- Development of measures and incentives for both workers and companies to increase the

number of people with a disability working within the disability sector.

- Addressing workforce issues requires investment not only in the content, quality and accessibility of training to increase the supply of skilled workers, but also in improving the conditions of those employed in the sector.

6 Regulation reform.

- Pricing regulation needs to be re-set see point 3 above.
- Current registration processes are clunky, expensive, backlogged and not fit for purpose. Worker and Provider Accreditation models and systems are far more nuanced, less expensive and deliver greater oversight.
- NDIS regulation should be collaboratively co-designed, to embed minimum standards (such as DIA's Professional Standards of Practice) with greater oversight and compliance requirements for more specialised support where there is a greater potential risk.

- Create a singular disability regulation structure for those that operate within the NDIS to ensure that double and triple handing of regulation process are eliminated. This requires far greater alignment to state, territory and other regulatory systems and safeguarding measures.
- Re-focus sector regulation and compliance to deliver proactive oversight and stewardship instead of waiting to intervein based on a complaint after something has gone wrong.

7 Ongoing genuine co-design.

- Actually, deliver ongoing and genuine co-design and collaboration, instead of the common practice of running countless workshops, webinars and other engagement activities where the views of participants, providers and stakeholders are only captured if they fit within the intended narrative or direction that has been decided well before these sessions have been run.

8 NDIS review implementation, oversight and leadership.

- The NDIS Review should give deep consideration about how its recommendation might be implemented and provide clear underlying intent to its recommendations.

Since 1 July 2016 there has been 728 publicly available individual recommendations and finding made to NDIS, that the Commonwealth Government has accepted from reviews like the Tune Review, Australian National Audit Office Audits, Productivity Commission Reports, Joint Standing Committee Reports, NDIA directed consultancy reviews and NDIS Independent Advisory Council papers and reports.

DIA understands that as of 30 June 2023, less than 152 (20.8%) have been completed and fully implemented.

Further of those that have been implemented, in many cases have not delivered the significant shift or uplift expected, hence the need for the NDIS Review to be undertaken.

Given this the NDIS Review must consider how it intends to monitor, drive, and oversee the implementation as intended of its recommendation.

- Co-designing the implementation roadmap with the sector is critical as successful implementation of most recommendations and reforms will rely on provider capacity and capability.
- Establish an industry led NDIS Reform Implementation Transformation Taskforce (similar to that established in other sectors such as aged care).
- Over the past 10 years, providers have given of their time, expertise and covered the significant costs of transformation. Provider has given the Australian Government and the Taxpayer a fair share of these costs. Future transformation must be supported by a NDIS Industry Transformation Fund similar to those that have been established in other industries, such as the manufacturing and automotive sectors.

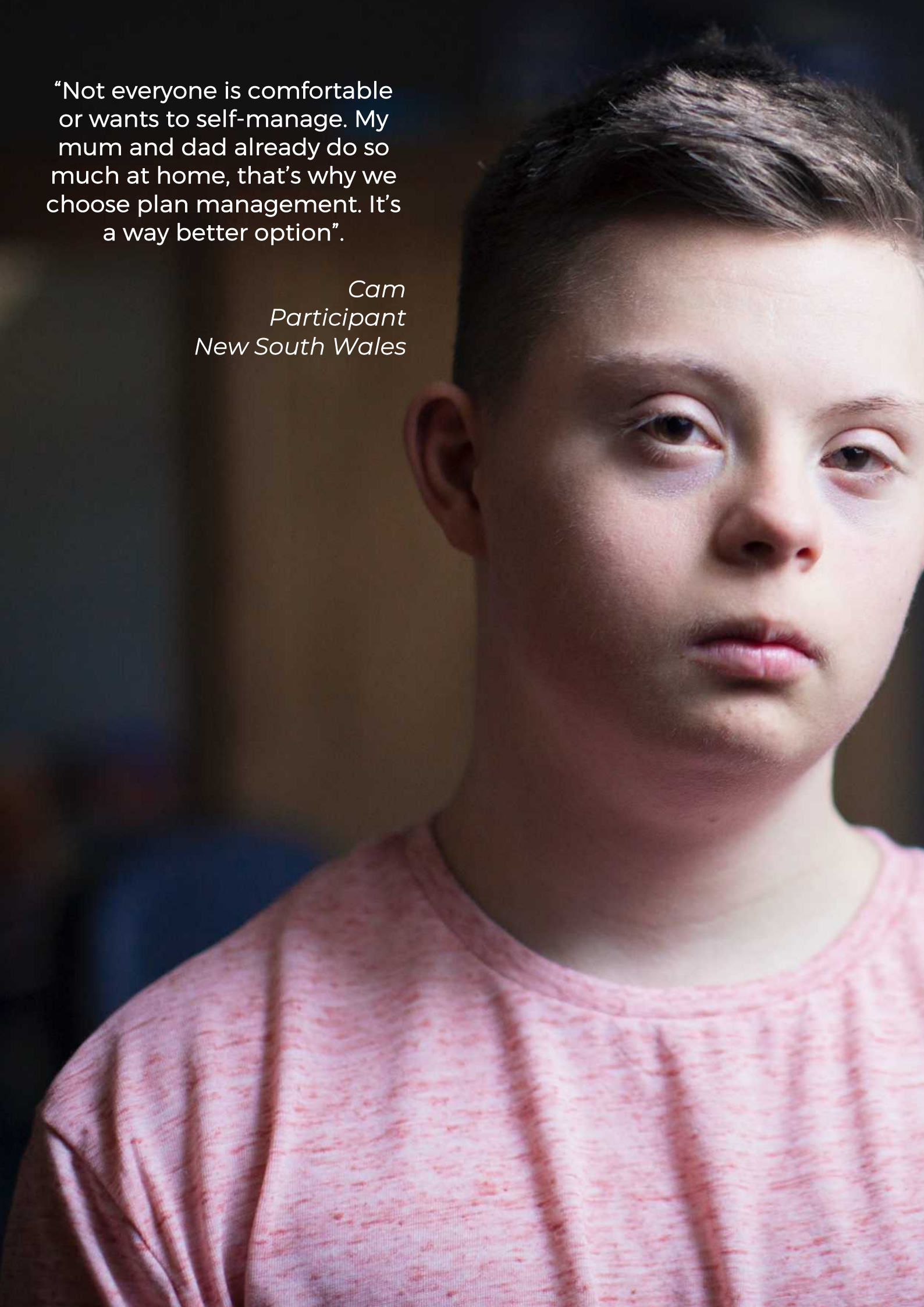
9

De-politicise the disability supports and services.

- The NDIS is spoken far too much in terms of sustainability and cost to the Australian people. Without recognition that the entire idea of the NDIS is to be there for any Australian that might need it.
- Some of us are born with a disability, many Australians acquire a disability every year.
- The NDIS and disability support should never be seen as a drain on the tax payer but the insurance scheme that it was always intended to be.
- Available for all when you need it.

“Not everyone is comfortable or wants to self-manage. My mum and dad already do so much at home, that’s why we choose plan management. It’s a way better option”.

*Cam
Participant
New South Wales*



INTERMEDIARY SECTOR BACKGROUND

Under the NDIS participants are able to engage highly skilled intermediary supports;

- A Financial Intermediary known as a Plan Manager to assist in managing their NDIS budgets; and
- A Service Intermediary known as a Support Coordinator to assist with the procurement and coordination of support arrangements with providers.

Intermediary supports are revolutionary and innovative, with both Plan Management and Support Coordination being introduced as disability supports as a part of the introduction of the NDIS.

Despite this, Support Coordination and Plan Management core functions have remained consistent, focusing on navigation, guidance and support, oversight and monitoring of service providers,

functions and delivery mode for the Participants they service.

The growth in overall Participant demand for intermediary services continues to be strong:

- 282,640 NDIS Participants (45%) have been funded, via a reasonable and necessary decision, for Support Coordination; with the remaining 55% being supported by a NDIA Partner in the Community (LAC or ECEI); and
- 394,725 NDIS Participants (66%) have made the choice to have NDIS funds managed by a Registered Plan Management Provider (RPMP).

Whilst there remain challenges within the operating and policy environment the sector is responding to the increases in Participant demand with participants generally able to access a choice of intermediary providers.

Intermediary organisations play a critical, and yet often underfunded role in negotiating support costs with providers, making arrangements for support delivery

and providing information and ongoing support to providers regarding the specific needs of their clients.

Intermediaries guide NDIS participants through the complexity of the scheme, to better inform participants, assist with administration and claiming and funds disbursement.

**66% of Participants
utilise a Plan Manager
and
45% of Participants are
funded for Support
Coordination.**

Plan Management

The NDIS should be commended for its support for participant self-direction and choice and control. 88% of all NDIS participants (Self and Plan Managed) are self-directing how their plans are being utilised, either by themselves or with support of a Plan Manager.

These participants also have access to the broader disability support market and are able to exercise choice and control to self-direct the purchasing and delivery of supports they need to live a good life.

As referenced in the Tune Review (Tune, 2019), Plan Management could be seen as an extension of Self-Management something akin to 'Supported Self-Management'.

Plan Managed NDIS participants have many of the benefits of Self-Managing whilst being provided with support to understand their plan, make their own informed purchasing decisions and gain the most value from their plan.

Whilst the number of fully Self-Managed and Partially Self-Managed participants has remained relatively static at around 23% and 7% respectively, the demand for Plan Management has exploded growing from just 8% in 2016 to 60% by 30 June 2023.

Plan Management service functions include:

- » Understand Participant's Supports and Plan Goals.

- » Establishing Preferred Method of Communication with each Participant.
- » Understand the NDIS Price Arrangements, Price Limits and Plan Budgets.
- » Invoice Validation and Confirmation of Service Delivery.
- » Support Participants to understand Scheme rules.
- » Prompt Claiming from NDIA.
- » Disputed Claims and Claiming Errors via NDIA manual processing.
- » Prompt Disbursement of Funds to the Participants Providers.
- » Ensure Payment Integrity through:
 - Price Limits
 - Ensuring Banned Providers are not claiming funds from Participants Plans;
 - Restricted and Professional Services are being claimed by provider who meet those requirements.
- » Plan funding information and statements on spending are provided to NDIS Participants in a communication manner

that meets their needs.

- » Management of Funds and Bank Accounts in line with Trust Accounting Principles including Reconciliation of Accounts and Separation of Transactions.

Support Coordination

A Support Coordinator assists Participants to find, connect and negotiate with providers and assist them to 'optimise' their plan and get the most out of their funded supports.

Support Coordination is a capacity building support under the NDIS. There are three levels of Support Coordination that may be funded within a Participant's plan.

- » **Level 1: Support Connection**
- » **Level 2: Coordination of Supports**
- » **Level 3: Specialist Support Coordination**

Based on the level of funding and details contained with the NDIA Request For Service issued to a Support Coordinator a Support

Coordinator may be engaged to deliver the below service functions:

Support Coordination Functions	Level 1 Support Connection	Level 2 Coordination of Supports	Level 3 Specialist Support Coordination
1. Support Participant Understand and Implement their NDIS Plan.	✓	✓	✓
2. Connect with Supports and Services	✓	✓	✓
3. Design Support Approaches	-	✓	✓
4. Establish Supports	✓	✓	✓
5. Coach, Refine and Reflect	✓	✓	✓
6. Targeted Support Coordination	-	✓	✓
7. Crisis: Planning, Prevention, Mitigation and Action	-	✓	✓
8. Address Complex Barriers	-	-	✓
9. Design Complex Service Plan	-	-	✓
10. Build Capacity and Resilience	-	✓	✓
11. Reporting to the NDIA	✓	✓	✓
12. Support Participants to make complaints and exercise their rights as a consumer.	✓	✓	✓
13. Reporting to the NDIS Commission as required under the NDIS Code of Conduct as well as the Practice Standards when registered.	✓	✓	✓
	Base Intensity with Base Practitioner Skill and Experience Level	Intermediate Intensity with Intermediate Practitioner Skill and Experience Level	High Intensity with High Practitioner Skill and Experience Level

Where a Participant receives funding for Support Coordination in their plan, the funding may be used to purchase support at any of the three levels, except where it is specifically stated in the plan for a specific level.

The demand for Support Coordination continues to grow with 58% of approved plans in 2022-23 Quarter 4 containing funding for Support Coordination.

Sector Sentiment

The response from Intermediary providers remains extremely clear; the sector has a complex relationship with multiple government agencies in relation to payments, the regulation of quality and safeguards, and funding streams.

Support Coordination providers that deliver critical plan implementation, capacity building and levels of crisis support indicate that inefficient systems, processes and timely access to knowledgeable NDIA staff often hinders their ability to deliver outcomes for the Participants they

service or results in underpayment for these supports.

Plan Management providers indicate that the current and proposed new PACE systems, reporting functionality, APIs, payment claim escalation process and access to timely resolutions require substantial improvement.

Whilst intermediary providers have indicated that some small recent improvements by the NDIA were received well more work is needed as these pain points often hinder their ability to deliver outcomes for the Participants they service and results in increased administrative costs.

**90% of providers report
they're dissatisfied with
NDIA systems, processes
and policy**

Administrative burdens of NDIS systems and processes frustrate providers, with 90% of respondents strongly disagreeing or disagreeing that systems and process in the NDIS are working well, a 10% increase in dissatisfaction. Overall, only 1% of respondents strongly

agree or agree that the NDIA is working well with intermediary providers.

In the last Australian Disability Intermediaries Sector Report, DIA noted and welcomed the 2019 announcement and release of the Digital Partnerships Program and Office (DPO) along with the release of NDIA APIs, however, since the introduction of the program providers report developments have been slow and to date only provides base line and limited functionality.

Whilst improvements to the NDIA's APIs, providers are reporting to DIA that they remain unable to conduct substantial and needed volumes of their business activity through the APIs, with call rates, burst limits and processing time constraints being the most mentioned issues.

Whilst DIA remains hopeful and supportive of the DPO, the current available APIs are by industry standards still a BETA product, with at least a five-fold development required to make them fit for market use.

Notably provider relationships with the NDIS Quality and Safeguards Commission do not differ substantially to that of the NDIA with only 22% either agreeing or neutral to the statement that they are working well with intermediary providers.

In general, responses suggest that the Commission is experiencing significant delays in the registration processing as well as less than expected responses to complaints being lodged.

Sector Pain Points

The Intermediary sector is experiencing eight key issues:

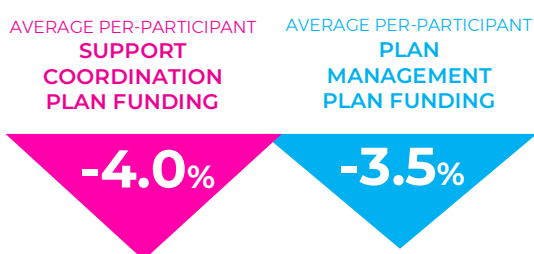
1. Intermediary pricing, funding and payments have reduced.

Over the past 24 months DIA has seen the impact of both NDIS plan funding and pricing policy.

Both Support Coordination and Plan Management services have had a price control freeze for almost 4 years with NDIS price controls

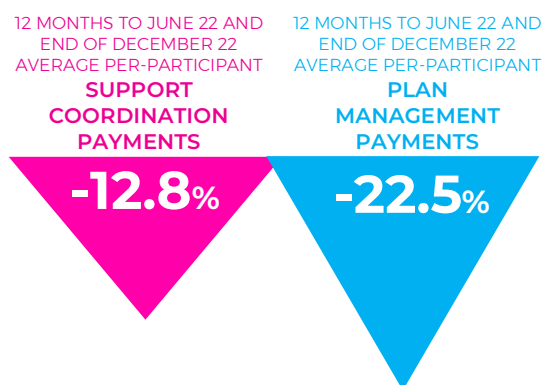
being fixed, despite warnings from DIA, providers and participants.

This is further compounded by reductions in per participant funding. From the end of 20-21 Quarter 4 to the end of 22-23 Quarter 4 average per participant plan funding for Support Coordination and Plan Management has reduced by around 4% and 3.5% respectively.



What is significantly more concerning is the reduction in average per participant total payments made for Plan Management and Support Coordination.

Over the 2022-23 financial year annualised payments made from June 2022 to the end of June 2023 for Support Coordination and Plan Management has reduced by around 12.8% and 22.5% respectively.



These reductions have been caused by a number of factors including changes to NDIA Price Control Policies (such as removal of Plan Management Set-Up Fees for plan extensions), longer plan durations where participants are left short at the end of their plan, changes in NDIA policy, delays in plan reviews/reassessments and changes to what is considered reasonable and necessary.

Over the same period, total scheme funds have increased however this is due to the growth in the total number of participants requesting Plan Management or being funded for Support Coordination and hides the reduction in funding and payments for each participant.

Since the end of September 2020, more participants have been funded for Support Coordination and Plan Management supports. However, on average each

participant is receiving less funding. This means that on average each Plan Manager and Support Coordinator is receiving significantly less payment for their services per-participant.

2023-24 Financial Year marks the 4th consecutive year NDIS price controls for Plan Management and Support Coordination have not changed despite CPI rising 6.1% in 2022 and 7% in 2023.

2. Increases in workload.

Both Support Coordination and Plan Management providers have reported substantial increases in workload per participant over the past 18 months.

Plan Management workload has increased by 56% in the last 18 months.

Plan Managers have reported that this has been driven by:

- 32% increase in claims for NDIS funds;
- 15% increase in funds under management by Plan Managers since the last price increase;
- 900% increase in NDIA audit / compliance activities;
- Significant inefficiencies with NDIA's new Business System PACE;
- Increase in delays for NDIA to release funds;
- Errors with and Missing NDIA remittance advices; and
- Increases in plan funding shortfalls.

Support Coordination workload increased by 45% in the last 18 months.

Support Coordinators have reported this has been driven by:

- Changes to participants NDIS funding;
- Increasing demand by NDIS participants to lodge review of reviewable decisions;
- Significant inefficiencies with NDIA's new Business System PACE;

- Increases in instances of crisis events;
- Increases in plan funding shortfalls.

3. Participant plan / plan management fee error remediation.

DIA has over the past 12 months engaged with the NDIA, providing significant examples and evidence of planning errors resulting in the significant under payment of Plan Managers.

DIA is pleased and welcomes the NDIA acceptance that internal planning errors have resulted in plan managers being unable to charge for the full amount for their services.

The Plan Management remediation program formally commenced in October 2022 and concluded March 2023.

All plans that had expired between 1 January 2021 and 31 December 2022 and all active plans were reviewed in this program.

68,370 NDIS Plans were identified with planning errors, impacting 57,403 NDIS Participants.

68,370 NDIS Plans were identified with planning errors, impacting 57,403 NDIS Participants.

As of 17 April 2023, the NDIA has paid or credited 740 Plan Managers in relation to this work.

DIA thanks the NDIA for their engagement with this work and looks forward to working with the NDIA to ensure an ongoing management solution to this issue.

4. NDIA's new pace system.

Both Support Coordination and Plan Management providers have reported that they believe they will be required to significantly invest in Technology systems, training, updates and certifications over the

next 12 months despite in most cases their current systems not being near end of life.

With pricing frozen for the fourth consecutive year this puts significant pressure on providers resulting in a degrading level of quality within the sector.

DIA has raised significant structural and significant issues with the PACE system that must be resolved and made fit for purpose before the system be further rolled out.

It will likely cost intermediaries \$30M in staff training alone to transition to PACE over the next 12 months.

New system transitions are extremely complex, high risk and require significant re training of staff.

“PACE is a trainwreck in the making. The NDIA has been told of issues since December 2022, yet we keep

getting the same messages of everything will be fine, whilst development is very slow.

Providers pay the price so that the NDIA can have a system that better suits the NDIA’s needs. Provider needs have been an afterthought”.

Tasmanian Plan Manager during a NDIA PACE workshop

Support Coordinators and Plan Managers involved in the NDIA PACE system pilot in Tasmania have reported that on average each staff member requires 12 hours (\$746.10 per worker in wage cost) and 15 hours (\$788.64 per worker in wage cost) respectively in training to begin utilising the NDIA new PACE system.

With over 38,000 workers in the sector, this represents a likely staff training cost of almost \$30M to the sector.

DIA acknowledged that these re-training costs are contained specifically to the rollout of PACE, i.e. transitional cost, once fully rolled

out new workers will have such training rolled into their onboarding / induction process.

This is before the significant costs and work required in system changes, development and testing that will be required to operationalise the NDIA's system for providers.

Plan Managers and Support Coordinators are required to operate a sustained high level of efficiency to be viable. However, at this moment in time the PACE system is not capable of achieving the required levels of efficiency within the existing price limits.

5. Cyber security.

Both Support Coordination and Plan Management providers have reported that they believe they will be required to significantly invest in Technology systems, updates and certifications over the next 12 months.

Cyber Security is a shared responsibility across the NDIS. The NDIA has significantly increased its technical and procedural

requirements to access digital channels such as API's. Recently requiring providers to undergo ISO 27001 certification.

To achieve this, providers are required to undertake 2 stages of Audits. During DIA's benchmarking program we asked Plan Managers and Support Coordinators who had undertaken such certification what their cost were between \$15,000 and \$50,000 depending on the certified auditor.

Beyond this, periodic surveillance audits which are required cost between \$7,500 and \$25,000. Typically, surveillance audits cost about half the initial two stage audit costs.

DIA is not only supportive but champions robust measures to bolster scheme wide cyber security, however these significant costs have not been factored into the pricing agreements set by the DIA.

Beyond this, the NDIA have indicated that they will be asking even more from Providers to further bolster scheme cyber security. There are no specific details on what these measures will be, however it is clear in the language provided by the NDIA that these will not be insignificant.

Whilst DIA is not only supportive but champions robust measures to bolster scheme wide cyber security, however these significant costs have not been factored into the pricing agreements set by the NDIA.

6. Reduced trust.

Intermediary providers report that low trust in NDIS systems and process is at an all-time low with only 1% of respondents reporting that systems and processes in the NDIS are working well; pointing to:

- Top Slicing / Robo Debt approach of Plan Managed Funds Claims to re-pay a debt incurred by a participant to the NDIA. Forcing Plan Managers to act as third-party debt collectors;

- Poor communication and assumption of guilt by NDIA compliance activities;
- Underdeveloped NDIA APIs, that don't meet the needs of providers;
- Increasing volume of NDIA requested Support Coordination reports going unread prior to or at plan review meetings;
- Reduction in NDIA crisis management protocols and escalation points for participants at significant risk; and
- Increases in NDIA backlogs with increasing delays to plan reviews, change of circumstances and review processes.

7. Future direction of intermediaries.

Despite the outcomes and significant investment being delivered by disability intermediaries along with ongoing increase in participant demand for Plan Management and Support Coordination, providers report that the future direction of intermediaries is unclear.

Less than 1% of Support Coordinators and Plan Managers say that the NDIA is clear about the future direction of intermediary supports.

This is being driven by poor communication from the NDIA about future strategy and policy.

With the Disability Royal Commission and NDIS Review to hand down their findings and recommendations at the end of 2023, the sector will remain uncertain about the future direction of the Scheme.

Intermediaries experienced Workforce Turnover of 21.8%.

An extraordinary 68% of intermediary providers reported increased difficulty in recruiting workers, up from the still significant 38% in 2020.

8. Workforce challenges.

Both Support Coordination and Plan Management providers have reported significant increases in workforce costs and worker burnout.



"It took a couple of goes to find the right support coordinator for me, but once I did a lot of new support options opened up, some I didn't even know existed!"

*Alexis
Participant
Western Australia*

SUPPORT COORDINATION CURRENT STATE

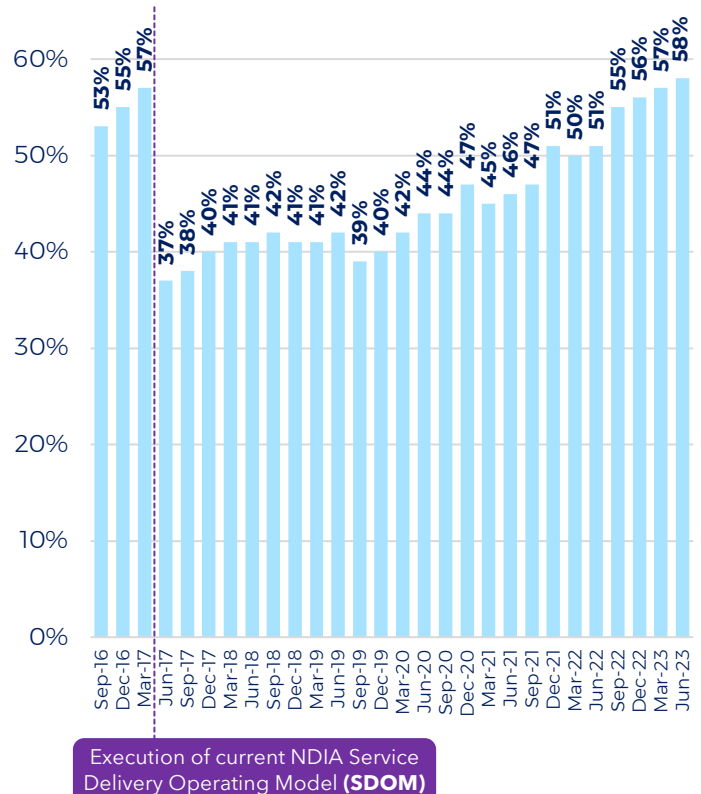
Support Coordinators, also known as service intermediaries, play a significant role in assisting participants of the NDIS in achieving quantifiable and positive outcomes whilst maintaining and building the capacity of participants.

Support Coordinators must conduct themselves in a professional manner and champion the social and economic participation and employment of people with a disability.

256,290 Participants are funded with Support Coordination. This represents **45% of all Participants**, showing the ongoing demand for Support Coordination.

Importantly DIA is seeing an increase in the numbers of participants in each quarter being funded with Support Coordination.

Chart 1: Incremental distribution of active NDIS Participants funded with Support Coordination within each quarter over time.



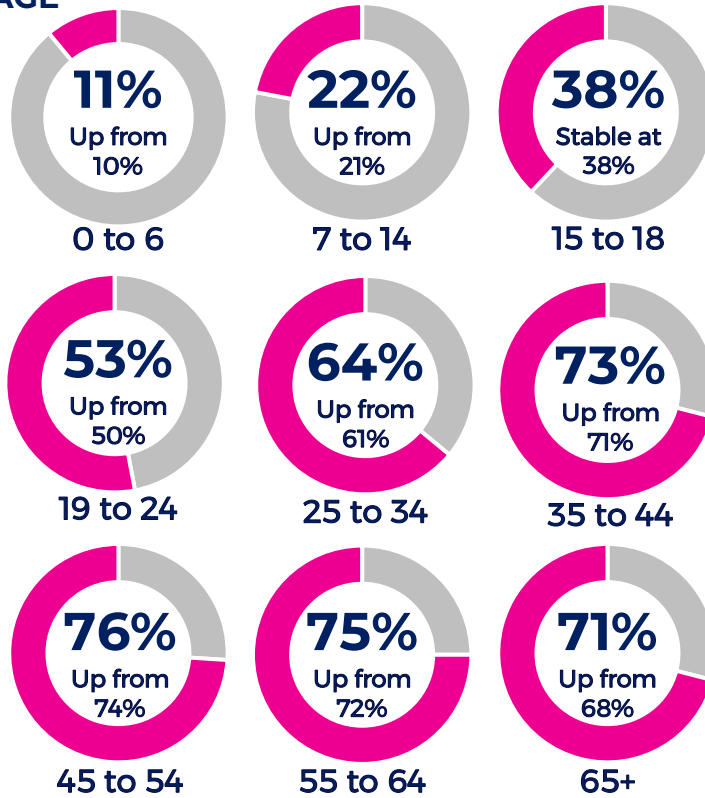
Participants are supported to implement their plan with the support of either an LAC / PITC or funded for Support Coordination.

It is important to note that Support Coordinators provide more than just navigation and plan implementation support and as such the below is not comparing like for like services or participant need.

“The NDIS is complex and very difficult to navigate. My support coordinator helps me through the bureaucratic maze to get the supports I need.”

Kelly - Victoria

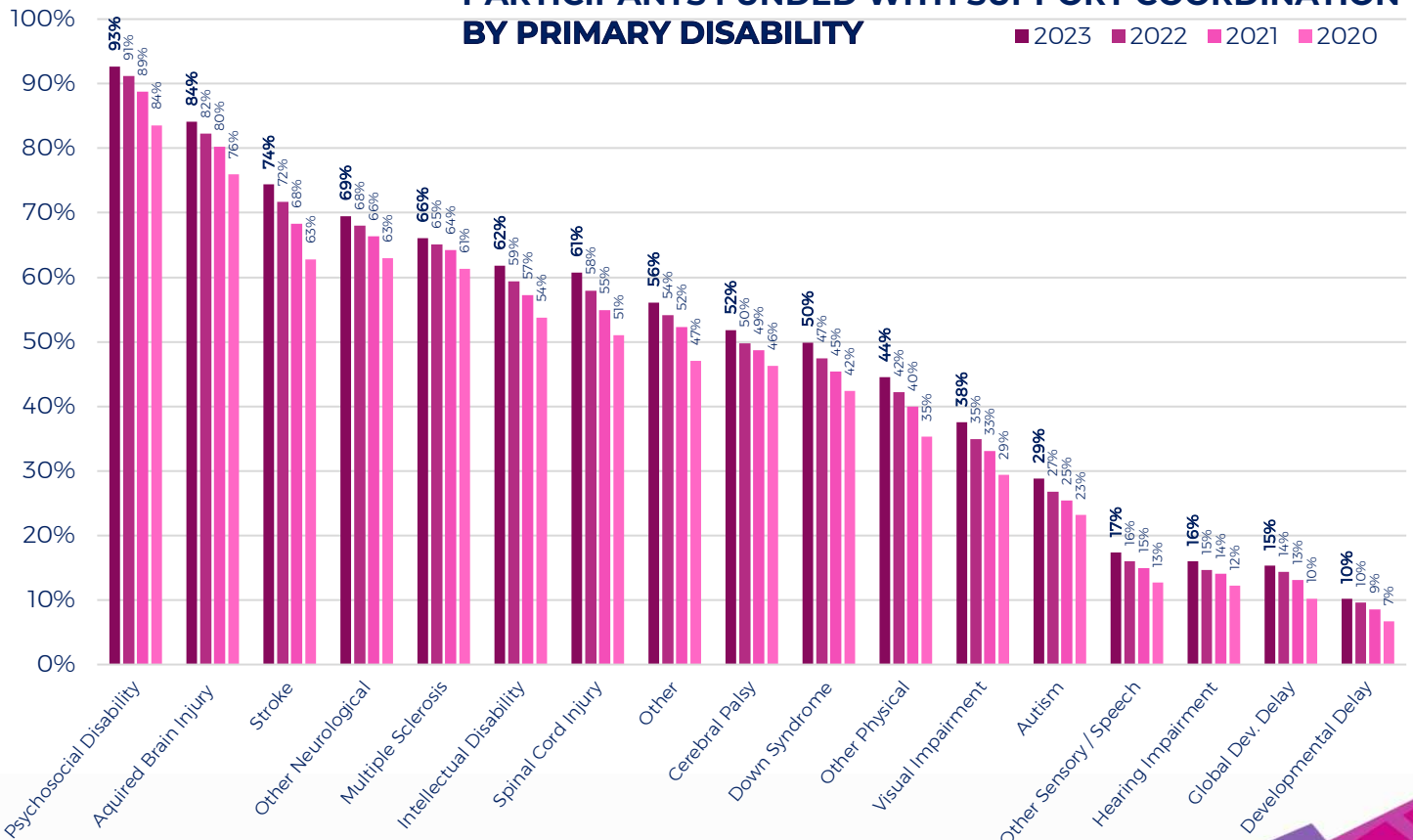
PARTICIPANTS FUNDED WITH SUPPORT COORDINATION - BY AGE



- Participants funded with Support Coordination
- Participants not funded with Support Coordination

There are several factors as to why there is such a low number of children aged 0 to 14 with funding for Support Coordination including the structure of Early Childhood Early Intervention plans, the types and complexity of disability and funded supports within plans along with the parent's capacity.

PARTICIPANTS FUNDED WITH SUPPORT COORDINATION - BY PRIMARY DISABILITY



However, despite Support Coordinators providing a high level of support to participants with more complex support needs the are funded per hour at significantly less, save for Level 3, than an LAC / PITC. Support Coordinators delivering significant saving to the NDIS whilst providing greater levels of outcomes to NDIS Participants (NDIA, 2021, 2022, 2023) (NDIA, 2021) (NDIA, 2018).

DIA understands that if all participants receiving Level 1 and Level 2 Support Coordination were to be supported by an LAC / PITC for the year ending 31 Dec 2022 it would cost the scheme an additional \$586m, assuming the same number of hours of participant support (NDIA, 2017) (NDIA, 2022).

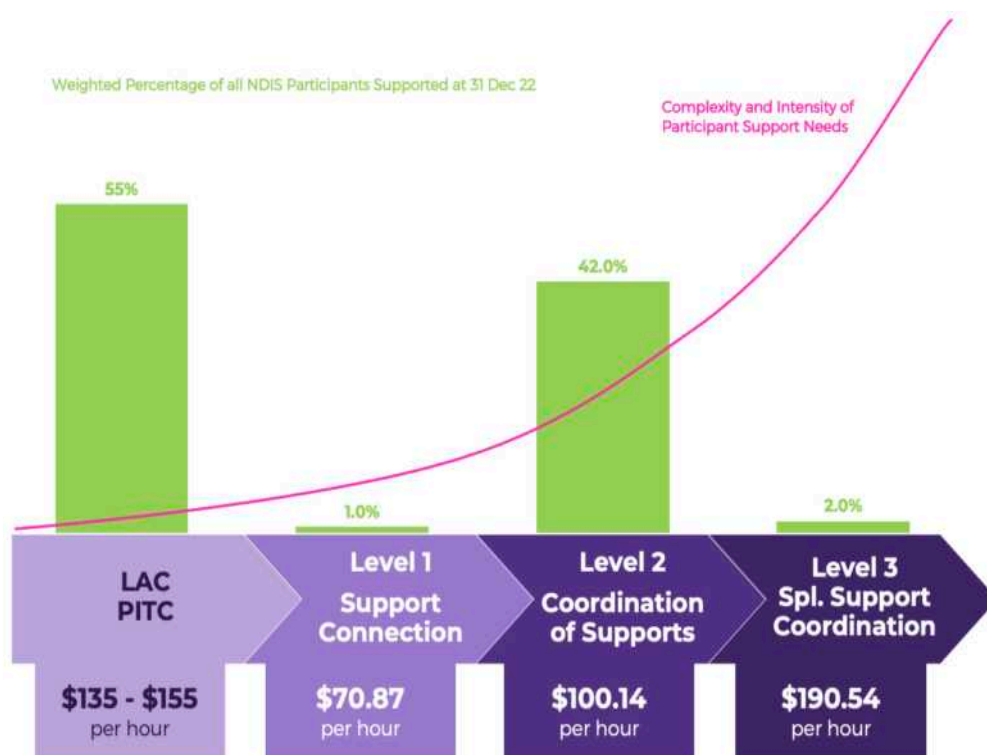


Chart 2
Participant Plan Implementation Supports by percentage of participants supported by each level, the hourly price limit / rate against the levels of participant complexity.

Looking beyond the NDIS for comparisons we must examine other like sectors. Of particular comparison is Aged Care and Care Finder. Whilst recognising these offerings support a different cohort of people, in DIA's view these are similar products for comparison because:

- They both support vulnerable Australians within a Government Social Services Scheme; and
- They both have a safeguarding and compliance regime that broadly aligns with the NDIS Quality and Safeguarding Framework.

Package based aged care hourly rate of \$126 is likely to have substantial upward pressure in the 2023-24 year because the Commonwealth has committed to funding the Fair Work Commission wage increase across Aged Care, effectively a 15 per cent increase to be implemented 1 July 2023.

SUPPORT COORDINATION BY STATE

as at 30 June 2023

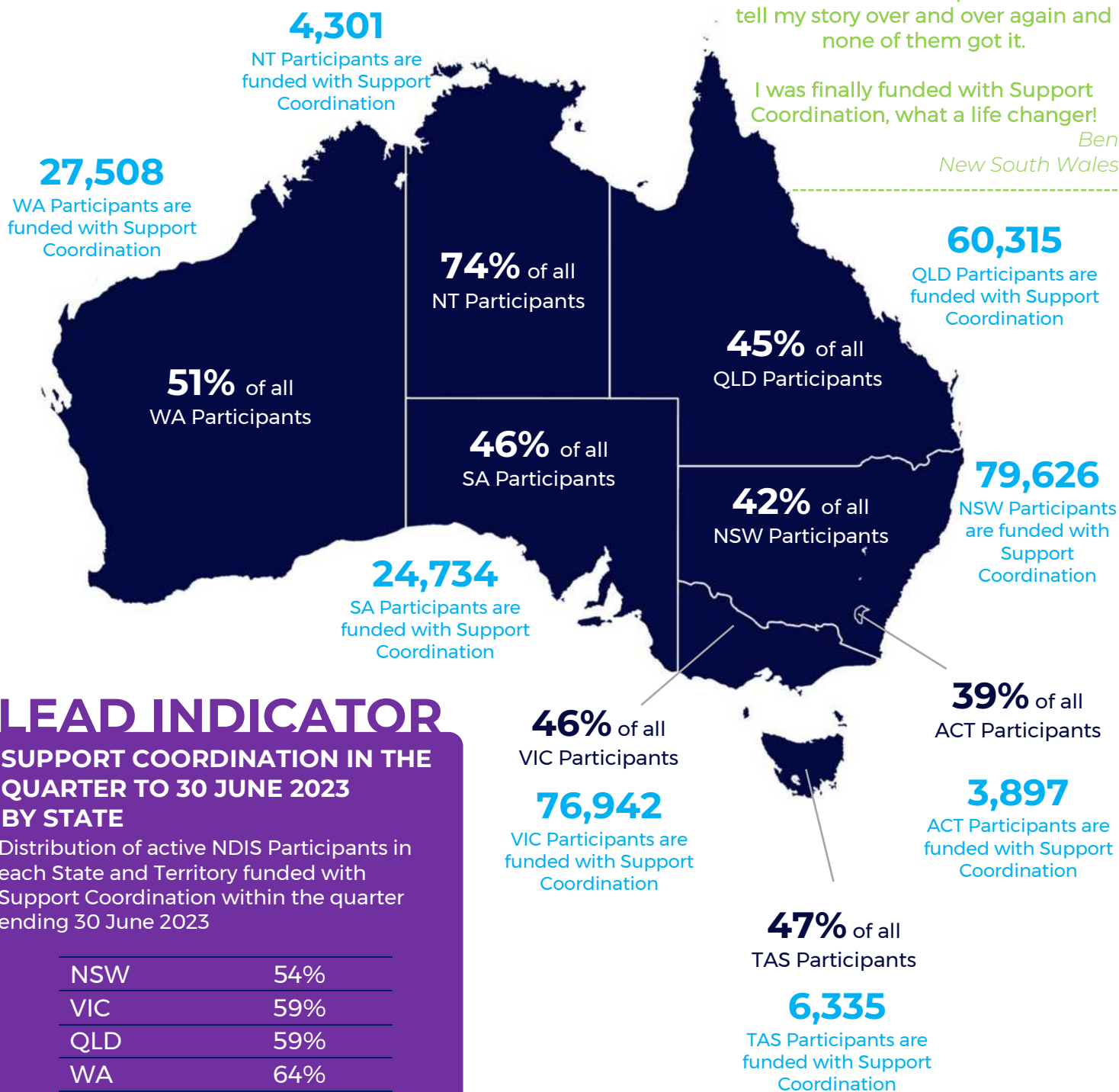
"I had to lodge an appeal to get funding for Support Coordination.

I had 4 different LACs in 7 months. Each of them was hopeless. I had to tell my story over and over again and none of them got it.

I was finally funded with Support Coordination, what a life changer!

Ben

New South Wales



LEAD INDICATOR

SUPPORT COORDINATION IN THE QUARTER TO 30 JUNE 2023 BY STATE

Distribution of active NDIS Participants in each State and Territory funded with Support Coordination within the quarter ending 30 June 2023

NSW	54%
VIC	59%
QLD	59%
WA	64%
SA	62%
TAS	52%
ACT	49%
NT	83%
NATIONAL	58%

For many participants it should be reasonable to expect that they will require and request funding for support to exercise their choice and risk consideration. This should be supported and encouraged through planning and delivery of their funded formal and unfunded informal supports.

Exercising choice is more than providing a list of local and available supports to a participant to review. It is a nuanced understanding of the participant including:

- Their needs;
- Their environment;
- Their circumstances;
- The way they want support;
- What risk in service design they are comfortable to take (i.e. trying new and innovative supports);
- Working with the participant to procure the services that will support them (i.e. connect with and establish the service); and
- Monitor the service, check-in on the participant and review / recommend service consideration for next plan.

Making the 'right' choices in a complex market environment can be daunting and stressful. Participants that our members service tell us that they are

overwhelmed by the amount of information they must process to find their way to services, not just in the first plan but in each plan (*Perdevich & Pagan, 2018*).

Support Coordinators, where appropriately funded, undertake this role and function, this is beyond the scope, function and skill set of other funded, contracted or commissioned supports.

Participant Choice and Control is currently limited based on the NDIA's decision about how a participant is able to implement and support their plan.

Under the current plan implementation and navigational model, for those without funded support coordination (around 55% of all participants), LACs AND ECEI Partners are their only source of navigational support. Our members and participants regularly report that the extremely low quality of LACs is a persistent and systemic issue, in some cases finding an appropriately skilled local area coordinator can be almost impossible (*Tune, 2019*).

Since the introduction of the LAC and ECEI (NDIA Partner) models in

2017, DIA has seen a constant and significant shift of workforce skills and experience within the NDIA Partners.

The participant plan implementation, navigation, community connection and development workforce skills are almost all gone, many have migrated into the Support Coordination field, being replaced with staffing that have greater administrative skills and capabilities to focus on the ever-increasing access, pre-planning and planning functions that have been thrust onto the NDIA Partners.

This means that it is no longer a matter of just let LACs be LACs after more than half a decade of purposeful eroding and shift in role responsibilities almost all of the required workforce skills have left or been replaced.

DIA is of the view that a participant is best placed to determine how they wish to be supported to implement, manage and build capacity throughout their plan.

Subsequently, participants should be able to indicate to a NDIA

planner whether they wish to be supported to implement their plan by themselves, with a Support Coordinator or with an LAC.

According to the NDIA, there are currently 7,023 active Support Coordination providers operating within the NDIS. Of these around **49% are registered and 51% are non-registered providers** (NDIA, 2023) (NDIA, 2022) (NDIA, 2021) (NDIA, 2020) (NDIA, 2019). All providers (registered or non-registered) are regulated by the NDIS Quality and Safeguards Commission.

As with the Plan Management market, DIA is seeing significant levels of provider 'churn' at the small and micro end of the market.

This appears to be driven by Support Workers entering the market to deliver support coordination services without solid business foundations.

DIA is also seeing a large number of larger providers ceasing service with a large volume of workers of these organisations establishing a small business to continue to support the clients they were.

NDIA's current pricing structure is devoid of the actual costs to deliver Support Coordination and does not factor professional supervision to support quality service delivery.

Whilst the NDIA has focused on the overall number of registered providers and the basic metric of 'new entrants' to promote a flourishing sector, the incredibly high market 'churn' or volatility of registered providers demonstrates the lack of understanding regarding the level of investment and service skills required to establish a viable Support Coordination business.

DIA also notes that unlike other supports and services which were in place under previous State and Territory based disability schemes which continue to see a transition of legacy providers, the Support Coordination service was a new support that was established with the creation of the NDIS.

Whilst DIA welcomes and champions new entrants into the market, it is apparent that it is difficult for new entrants to compete when pricing is structured for long tail efficiency and not market transition, innovation, supervision or scale.

Background of Support Coordination price limits

The current pricing model and arrangements for Support Coordination is based on the work undertaken by the NDIA which dates back to 2016.

Level 1: Support Coordination has since 2016 for the most part, noting some minor discrepancies in early years, been fixed to the NDIA Disability Support Worker Cost Model as such each year the price limit for this level of Support Coordination has increased every year taking into consideration CPI rates and Award Wage increases.

Level 2: Coordination of Supports and Level 3: Specialist Support Coordination are not included in the NDIA Disability Support Worker Cost Model as such the price limits for these levels of Support Coordination have not increased in

line with CPI or Award Wage increases. Since 1 July 2020 the price limit for Support Coordination Level 2 and 3 have been frozen.

Support Coordination Price Limits Since 1 July 2016



How the NDIA can reasonable justify not increasing all levels of Support Coordination equally, particularly given the increased levels of complexity in participant support needs as higher levels of Support Coordination (2 and 3) are funded.

Not to mention the rates the LACs are billing the scheme (\$135 - \$155 per hour) to conduct similar plan implementation support and monitoring at, with participants that have significantly less complex support needs requiring less worker skill and experience.

In 2016 the NDIA set the foundational pricing structure for Support Coordination. Despite the NDIA stating that the price limits for Support Coordination Levels 2 and 3 “were not set by reference to a specific cost model.” DIA understand that the NDIA has used some modelling or assumptions when establishing the Price Limits back in 2016.


DIA has been able to locate photos of slides from presentations delivered by the NDIA to providers in Victorian ahead of the Price Guide release in July of 2016, which provide a reasonable assumption as to how the prices were established for each level of Support Coordination.

DIA notes that whilst the below does not confirm that a full cost model was established for Support Coordination, however it does clearly indicate assumptions that

underpin the current disability support worker cost model, with items like the level of listed Award for workers, Billable hour rate assumptions (utilisation) and balancing measures for flat hourly rate limits.

2016 Assumption for Support Coordination Level 1: Support Connection

SUPPORT COORDINATION



Support connection (07_001_0106_8_3)

Assistance to strengthen participant's abilities to coordinate supports & participate in the community. This includes resolving points of crisis, developing capacity & resilience in a participant's network & coordinating supports from a range of sources.


Price Limit: \$56.61

- This price limit has been set to align with the price limits of other services that are delivered by similarly experienced and skilled workers and delivered at a similar rate of intensity. These are not interchangeable services, however have been used to support this price limit.
- These other supports include:
 - Life transition planning including mentoring, peer support and individual skill development (09_006_0106_6_3)
 - Transition through school and to further education (13_030_0102_4_3)
 - Assistance with accommodation and tenancy obligations (08_005_0106_2_3)
 - Financial intermediary - set up costs (14_033_0127_8_3)
 - Financial intermediary monthly processing (14_034_0127_8_3)
- As with the above supports, this support assumes workers are employed as Community Services Worker Level 3, Paypoint 2 as per the Award.

2016/17 NDIS Price Guide: Provider Information Sessions

2016 Assumption for Support Coordination Level 2: Coordination of Supports

SUPPORT COORDINATION



Coordination of supports (07_002_0106_8_3)

Further qualifications/experience required to strengthen a higher needs participant's ability to coordinate their supports & participate in the community. This may include resolving points of crisis, & developing resilience in the participant's network.

Price Limit: \$92.27

This price limit has been set taking into consideration a range of factors including:

- Billable hour ratio of around 70% due to:
 - Participants complex individual support needs and higher intensity levels.
 - Likely levels and duration of point of crisis during a Participants Plan.
- This supports assume workers are employed as Community Services Worker Level 5, Paypoint 1 as per the Award.
- Supervision by highly skilled senior workers (likely Allied Health, Therapy qualified or Community Services Worker Level 7, Paypoint 3).
- Continuous Improvement and Professional Development given the ongoing development, continuing change and implementation of the NDIS.
- Blended rate (balancing) for simple flat hourly rate price limits that considers afternoon, weekend, public holiday and broken shift wages rates etc. Whilst most service is expected to be delivered during normal business hours, this blended rate provides the Participant with the maximum choice and control without being concerned about increased costs associated with out of normal business hours service. This also has significant streamlining of NDIS Planning functions and efficient billing for providers.

2016/17 NDIS Price Guide: Provider Information Sessions

2016 Assumption for Support Coordination Level 3: Specialist Support Coordination

SUPPORT COORDINATION

Specialist support coordination (07_004_0132_8_3)

Time limited support coordination, within specialist framework necessitated by high risks in participant's situation, to address barriers and reduce complexity in environment, assisting to connect with supports, build capacity and resilience.

Price Limit: \$175.57

This price limit has been set taking into consideration a range of factors including:

- Billable hour ratio of around 65% due to:
 - High complex individual support needs at significantly higher intensity levels.
 - High levels and duration of points of crisis during a Participants Plan.
- There is not an award that this supports neatly fits under. This level of Support Coordination is likely to be delivered by Allied Health Professionals, Qualified Therapy Practitioners or Similar. The NDIA assumes workers are employed as one of the professions listed or under Community Services Worker Level 8, Paypoint 3 with an addition 8% loading.
- As with above, Supervision by highly skilled workers (Senior Allied Health, Qualified Therapy Practitioners or Similar). The NDIA assumes workers are employed as one of these professions listed or under Community Services Worker Level 8, Paypoint 3 with an addition 16% loading.
- Continuous Improvement and Professional Development given the ongoing development, continuing change and implementation of the NDIS.
- Blended rate (ballancing) for simple flat rate hourly rate price limits that considers weekend, afternoon, public holiday and broken shift rates, noting most service is expected to be delivered during normal business hours. This also has significant streamlining of NDIS Planning functions and efficient billing for providers.

2016/17 NDIS Price Guide: Provider Information Sessions

Support Coordination Funding

Overall, the benchmarking results showed that only 20% of the respondents returned a 'Profit / Surplus' in 2022 with analysis of the financial results data shows that organisations categorised as 'Small', and 'Medium' have a similar percentage of financial result as each other.

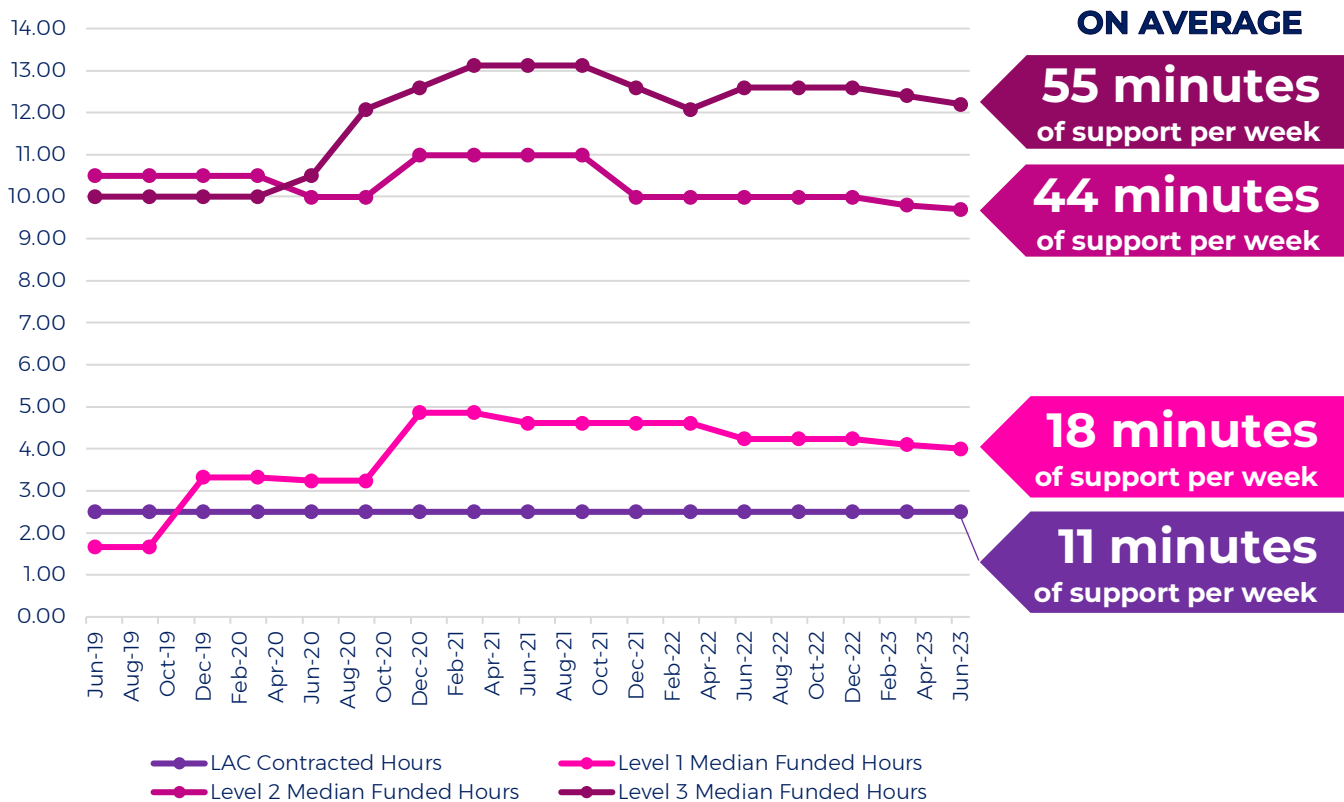
Organisations categorised as 'Large' have a lower percentage of respondents reporting a 'Profit / Surplus' financial result. This indicates that organisations of a larger scale find it more difficult to deliver Support Coordination supports at a profitable level.

—

“When I went through significant family trauma, my support coordinator was there to support me and lodged all the change of circumstances paperwork with the NDIA, a real god send during a dark period of my life”

*Peter
NDIS Participant
Victoria*

MEDIAN QUARTERLY REASONABLE AND NECESSARY HOURS FUNDED FOR SUPPORT COORDINATION, PLUS CONTRACTED LAC HOURS PER NDIS PARTICIPANT NATIONALLY OVER TIME



It is important to note that these average minutes of support are total times of support and is not exclusively face to face support time. Given the role and function Support Coordinators play in connecting and establishing supports for a participant most of this time will be unlikely to be face to face service with a NDIS Participant.

"I Plan-manage my supports so that I don't have to deal with the NDIA between plan reviews. The staff at the NDIA just don't understand me or my disability and its impacts.

The plan manager I use is fantastic, they answer my questions in a way that I understand".

*Peter
Participant
Victoria*



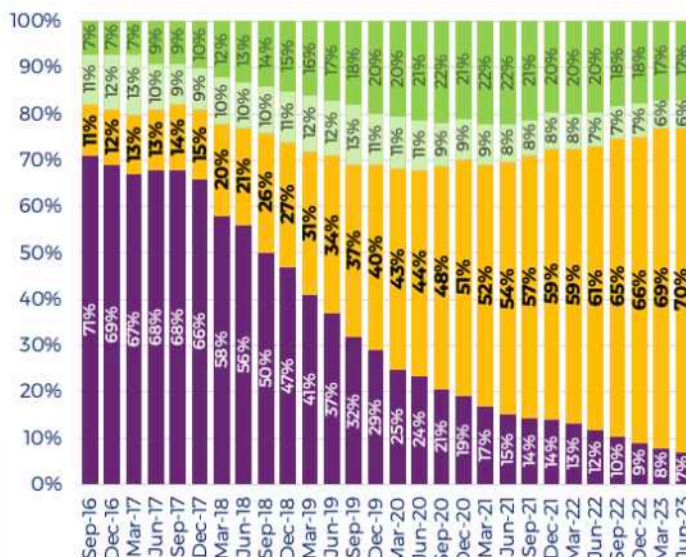
PLAN MANAGEMENT CURRENT STATE

Demand for Plan Management services has grown substantially since the inception of the scheme with **364,725 Participants** (66% of all Participants) having their funds managed by a Plan Manager.

This represents an incredible increase from just 3,913 Participants (11% of all Participants) at 30 September 2016, the 1st Quarter of the NDIS after the trial period.

Incremental distribution of Active Participants by method of Financial Management within each quarter over time.

■ NDIA-Managed ■ Plan-Managed
■ Self-Managed (Partially) ■ Self-Managed (Fully)

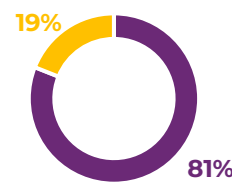


Incredibly in the Quarter to 30 June 2023 70% of NDIS Participants elected to have their NDIS funds managed by a Plan Manager with only 7% of NDIS Participants in the quarter electing to have their NDIS funds managed NDIA.

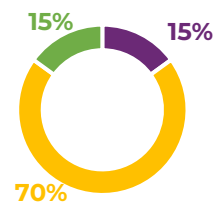
The proportion of payments self-managed, managed by a plan manager, and Agency-managed differs by support category in the quarter to 30 June 2023.

■ NDIA-Managed ■ Plan-Managed ■ Self-Managed (Fully)

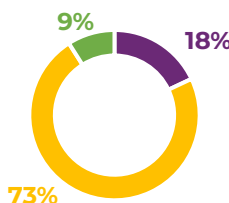
Participants in SIL
Core daily activities support



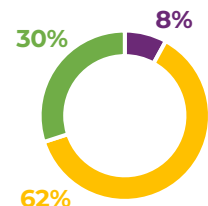
Participants NOT in SIL
Core daily activities support



All Participants
Core social participation support



All Participants
Capacity Building daily activities.



Plan Management continues to be the most management type elected by NDIS Participants for both volume of participants and percentage of funds being managed.

The exception is for those participants within SIL settings where their plans have been in the main NDIA-Managed. Despite this the choice to Plan-Manage more supports for NDIS Participants in SIL settings is growing increasing from 10% in December 2021 to 19% in June 2023.

Many participants who have entered the Scheme in more recent years have chosen to use a plan manager for most or some of their supports compared with participants who joined the Scheme earlier. This is one of the drivers of the increase in the number of participants with plan managers.

The Plan Management market is the only disability sector segment that is fully developed without any thin markets nationally. This is an incredible achievement and further demonstrates the innovative nature of intermediary supports.

For the first time in the scheme's history, the NDIS has seen the number of providers slow and then contract, despite the ongoing and increasing demand for the Plan Management service.

DIA contends that this is in the main due to the ongoing price freeze (price cut in real terms) of Plan Management. Management market grew by 227 providers.

Number of Plan Managers and Participants that elect to Plan Manage their funds by quarter.



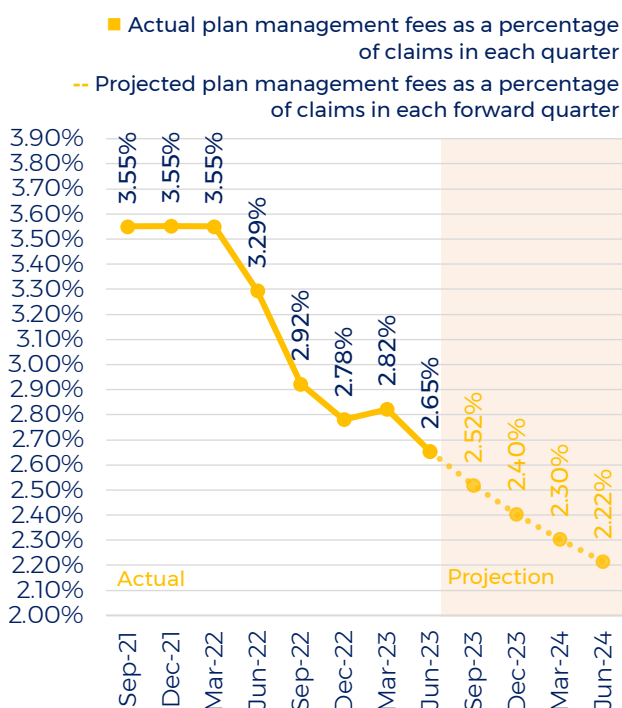
Growth in the number of Plan Managers began to slow after the announcement of the NDIA Annual Price Review in 2022, hitting its peak in September 2022 before it commenced contracting through to December 2022.

The number of Plan Managers again plateaued from January to March in 2023, before commencing to contract further after the announcement of the 2023 Annual Price Review. From September 2022 to June 2023 the Plan Management market has contracted by 8.53%.

Plan Managers continue to deliver excellent value to both NDIS Participants and the Scheme. Plan Managers are delivering high level of participant focused service, well beyond just simple transactional through-put, and yet are doing so at credit card transaction levels of cost.

It is no coincidence that the drop off of claimable fees commenced with the introduction of new NDIA pricing regulation which removed the ability for Plan Managers to claim for establishment fees when the NDIA extends a Participants plan. This is despite the almost identical level of work required to establish an extended plan.

Plan Management Fees as a Percentage of Plan Managed claims



This is further being experienced in the lead up to the further expansion of the NDIA PACE business system.

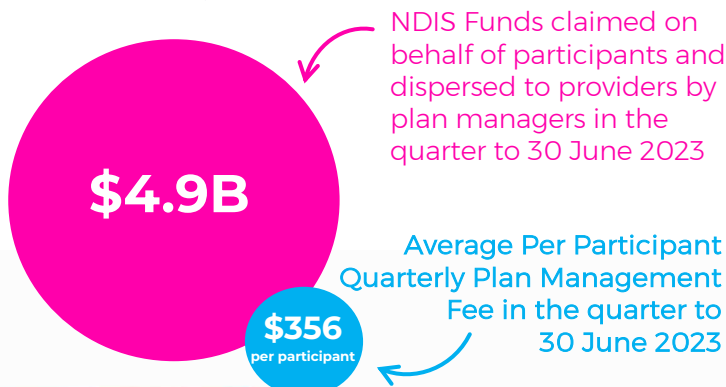
DIA understands that due in part to the expected expansion of PACE, the NDIA is actively extending existing Participants plans to reduce the risk and impact should PACE not deliver as intended through its expansion.

Based on the current price limits and settings, by the end of the 2023-24 financial year, DIA projects that Plan Management fees as a percentage of Plan Managed Claims will continue to fall to 2.22%.

To put it in simpler terms, in the June 2023 quarter, for ever \$1 a Plan Manager claimed on behalf a participant the Plan Manager was paid just 2.65c.

To compare and contrast adjacent sectors in 2020-21:

- Financial Services sector operated at around 14.6%;
- Administration and Support Services sector at around 8.7%;
- Health Care and Social Assistance sector (private) at around 18.0%;



- Administration and Insurance sector (public) at around 8.1%; and
- Professional Services sector operated at around 20.4%.

*Source: Australian Bureau of Statistics
2020-21*

This makes Plan Management one of the most price efficient services delivered within the NDIS.

DIA notes and has welcomed the series of high-profile acquisitions over the past 12 months, these acquisitions should not be taken as a reflection of market profitability or viability. Nor should such acquisitions be considered as the reason for the contraction in Plan Management providers since 30 September 2022, as the vast majority of these entities continue to trade or traded as individual entities through this period.

With per participant frozen over consecutive years (cut in real terms) along with detrimental changes to other Price Regulations the only way for Plan Managers to remain viable is to grow the number of Participants they service, whilst finding every greater efficiency to keep costs contained.

This is just one dynamic that is pushing the 4-5 largest Plan Managers to acquire smaller plan managers within the sector.

DIA has been able to locate photos of slides from presentations delivered by the NDIA to providers in Victorian ahead of the Price Guide release in July of 2016, which provide a reasonable assumption as to how the prices were established for Plan Management Supports.

2016 Assumption for Plan Management Set Up Costs

PLAN MANAGEMENT

Financial intermediary - set up costs (14_033_0127_8_3)

A one-off (per 12 month plan) setting up of the financial management arrangements for managing of funding of supports.

Price Limit: \$214.12

As mentioned above with Support Coordination, this price limit has been set to align with the price limits of other services that are delivered by similarly experienced and skilled workers and delivered at a similar rate of intensity. These are not interchangeable services, however have been used to support this price limit.

The set up costs price limit has been established so that Financial Intermediaries (Plan Managers) can initially support participants with the equivalent of 4 hours of support at the base rate of \$53.10 per hour. This is three dollars lower than other services which have a greater level of blending for afternoon, weekend, public holiday and broken shift wages rates etc. The NDIA has heard from providers who have recommended that this figure align with the that of Support Connection and like services, the NDIA will monitor this over the next year.

This support assumes workers are employed as Community Services Worker Level 3, Paypoint 2 as per the Award. Noting that teams type service delivery models are appearing as the most efficient offering, by assuming a Community Services Worker Level 3, Paypoint 2 this provides for efficient balancing across service models.

2016/17 NDIS Price Guide: Provider Information Sessions

2016 Assumption for Plan Management Monthly Processing

PLAN MANAGEMENT

Financial intermediary monthly processing (14_034_0127_8_3)

A monthly fee for the ongoing maintenance of the financial management arrangements for managing of funding of supports.

Price Limit: \$96.25

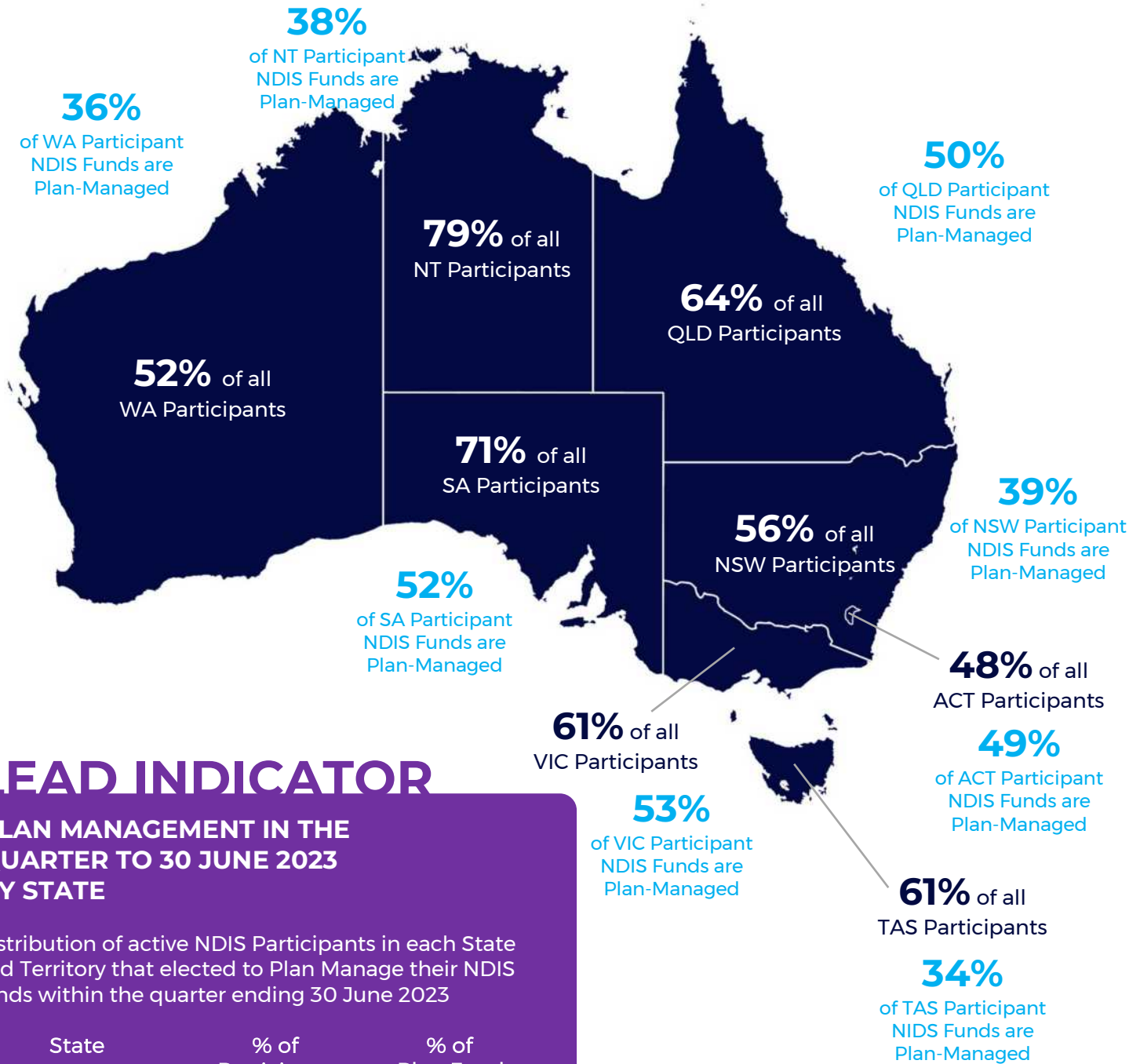
As mentioned above with Support Coordination, this price limit has been set to align with the price limits of other services that are delivered by similarly experienced and skilled workers and delivered at a similar rate of intensity. These are not interchangeable services, however have been used to support this price limit.

The month processing price limit has been established so that Financial Intermediaries (Plan Managers) can support participants with the equivalent of 1.8 hours of support at the base rate of \$53.10 per hour each month. This is three dollars lower than other services which have a greater level of blending for afternoon, weekend, public holiday and broken shift wages rates etc. The NDIA has heard from providers who have recommended that this figure align with the that of Support Connection and like services, the NDIA will monitor this over the next year.

This support assumes workers are employed as Community Services Worker Level 3, Paypoint 2 as per the Award. Noting that teams type service delivery models are appearing as the most efficient offering, by assuming a Community Services Worker Level 3, Paypoint 2 this provides for efficient balancing across service models.

2016/17 NDIS Price Guide: Provider Information Sessions

PLAN MANAGEMENT BY STATE



LEAD INDICATOR

PLAN MANAGEMENT IN THE
QUARTER TO 30 JUNE 2023
BY STATE

Distribution of active NDIS Participants in each State and Territory that elected to Plan Manage their NDIS funds within the quarter ending 30 June 2023

State	% of Participants	% of Plan Funds
NSW	65%	56%
VIC	70%	64%
QLD	73%	63%
WA	62%	52%
SA	81%	62%
TAS	62%	41%
ACT	59%	64%
NT	86%	56%
NATIONAL	70%	60%

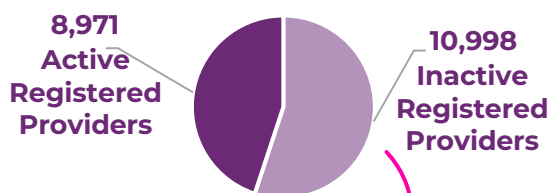
"The plan manager I use helps me with so much more than just paying bills. The support my decision making and are one of the few supports that are on my side, not the NDIA, not my LAC and not my providers."

*Mel
Tasmanian Participant*

All providers under the NDIS are regulated by the NDIS Quality and Safeguards Commission. The available market to Plan-Managed Participants is approximately 8.5 times larger than participants that NDIA-Manage their funds.

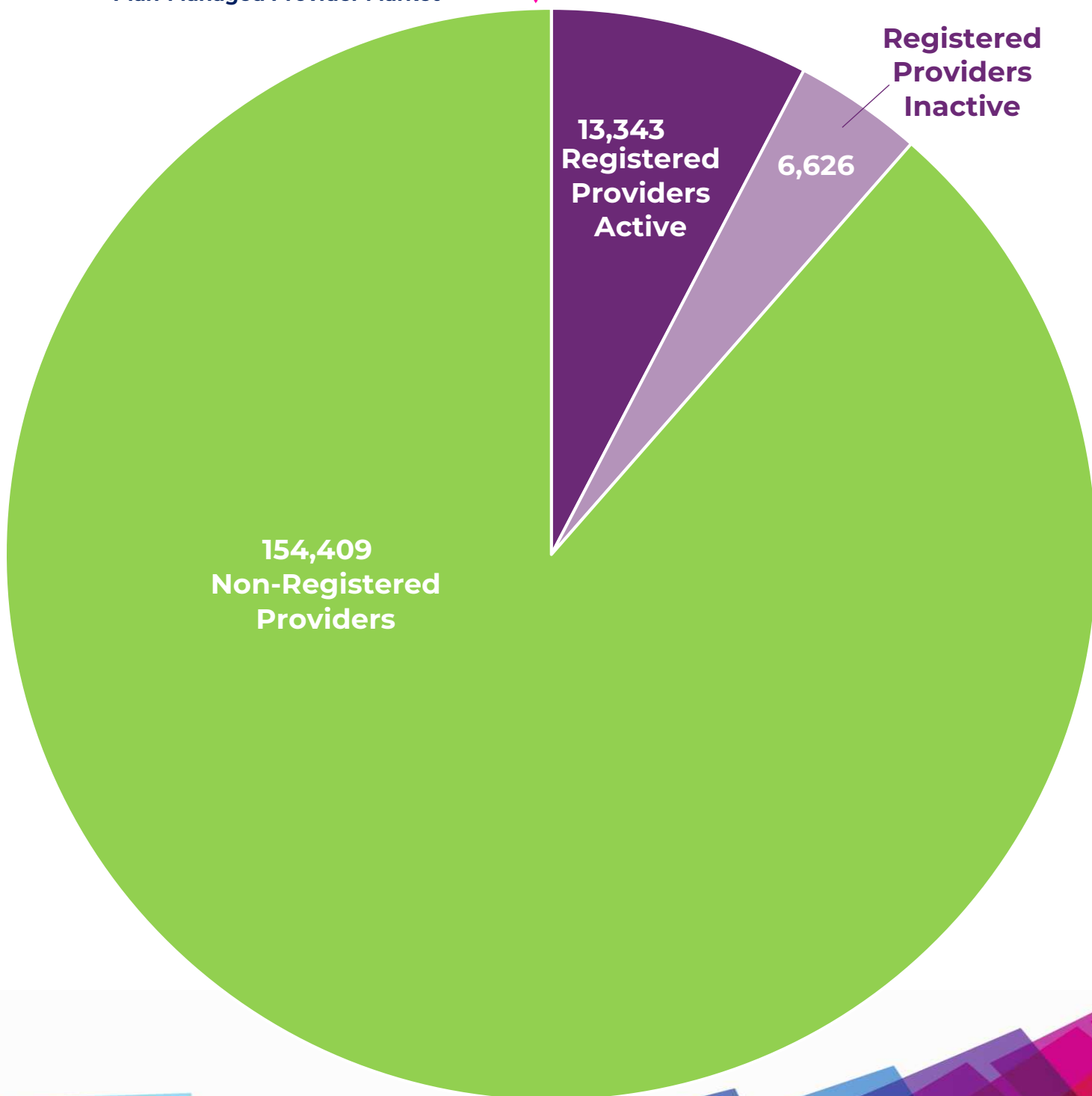
This market availability is critical to NDIS participants being able to exercise their choice and control and dignity of risk in the way in which they purchase their supports.

NDIA-Managed Provider Market



Plan-Managed market is 8.5 times larger!

Plan-Managed Provider Market



PLAN MANAGEMENT MARKET – 2020 to 2022

Plan managers play a crucial role in the NDIS ensuring a sustainable and efficient system, whilst assisting participants manage their NDIS plan funding. This chapter closely examines the extent to which these arrangements promote innovation, enhance service quality, and ensure value for money for participants.

The funding for supports that is provided by the NDIS under a participant's plan can be managed wholly or in part by the participant; or by a registered plan management provider ("plan manager"); or by the NDIA; or by a plan nominee (if one has been appointed).

Currently, participants can choose (subject to the terms of any plan nominee appointment) to engage a registered plan manager to manage some or all the funding for supports in their plan. If a participant makes this choice, then the NDIA is currently required to give effect to the participant's choice. The NDIA also then includes funding in the participant's plan so that they can engage their preferred registered plan manager.

The NDIS Act requires plan managers to be registered with the NDIS Quality and Safeguards Commission (NDIS Commission) in order to manage the funding of supports under a participant's plan.

As a result, they are required to: demonstrate compliance with the Core Module of the NDIS Practice Standards; comply with the NDIS Code of Conduct; have an in-house complaints management and resolution system to record and manage complaints, and support NDIS participants or other relevant parties to make a complaint; have an in-house incident management system, and notify the NDIS Commission should a reportable incident occur (including alleged reportable incidents); and fulfil the worker screening requirements where relevant.

Plan managers are also bound by the NDIS Pricing Arrangements and Price Limits. Plan-managed participants can only purchase supports that are listed in the NDIS Support Catalogue and are subject to the same billing rules and price limits as agency-managed participants.

Plan-managed participants can purchase supports from registered and/or unregistered providers (except where the NDIS Commission has determined that providers must be registered in order to deliver a particular type of support).

Plan managers receive funds from the NDIS and disburse funds on behalf of a participant to providers of other services received by the participant.

Plan Managers assist a participant by claiming directly from the funds in the participant's plan to pay providers on behalf of the participant; paying providers for the supports that the participant purchases; helping the participant keep track of their funds; and taking care of financial reporting for the participants. In some cases, plan managers also help participants choose their providers.

Plan managers must provide the Australian Business Number (ABN) of the service provider who delivers the support for all payment requests, except where the service provider is exempt from quoting an ABN under Australian Taxation Office (ATO) rules.

Exempt providers must complete the ATO's Statement by a Supplier form. Plan managers are expected to keep a copy of the completed form. Plan managers must always ensure that a valid tax invoice is included with each payment request and that the tax invoice includes relevant information about the goods and/or services purchased.

A plan manager may be liable to pay back any amount claimed from a participants plan that is not spent in accordance with that plan. This creates significant tension between representing the interest of the Participant verses those of the Scheme.

Plan managers can claim for three types of services:

- A one-off (per plan) establishment fee for setting up the financial management for a participant. This fee is placed into a Participants Plan when they request their NDIA Funds be Plan-Managed.
- A monthly fee for the ongoing maintenance of the financial management for a participant. This fee is placed into a Participants Plan when they request their NDIA Funds be Plan-Managed, and
- Where reasonable and necessary funding can be made available in a participant plan for capacity building and training in plan administration and management support to strengthen a participant's ability to undertake tasks associated with the management of their supports.

DIA closely monitors the Plan Management market. From the period of 1 July 2020 to 30 June 2023 (i.e 3 Financial Years) there has been 2729 individual Plan Managers were registered and made a claim from the NDIA. Of these only 955 Plan Managers remain active at 30 June 2023.

This means that over the 3 financial years on 35% of Plan Managers were able to remain in the market.

Only 35% of all Plan Managers in 2020 remain in the market in 2023.

Whilst the NDIA continues focus on the total number of providers stretch out over multiple years to show growth the realities of the Plan Management sector clearly show a more significant reality.

The Plan Management market continues to see incredibly high market 'churn' and volatility which demonstrates the lack of understanding regarding the level of investment required to establish a viable Plan Management business.

Unlike other supports and services which were in place under previous State and Territory based disability schemes which continue to see a transition of legacy providers, the plan management service was a new support that was established with the creation of the NDIS.

This further highlights the significance of the 'churn' being seen within the Plan Management market.

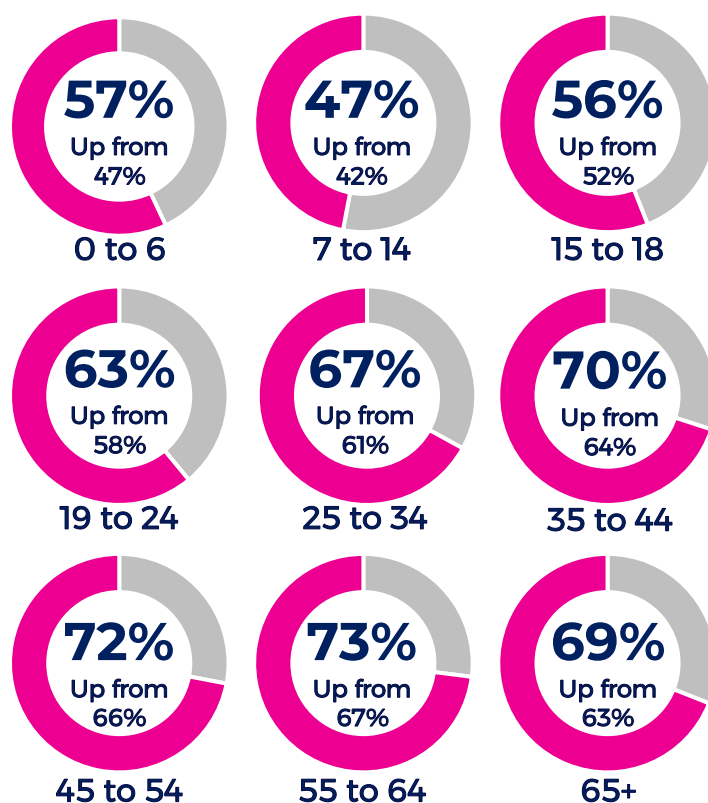
Whilst DIA welcomes and champions new entrants into the market, it is apparent that it is

difficult for new entrants to establish themselves when pricing is structured for long tail efficiency and not market transition or innovation.

"I get the best of both worlds, the choice and control of self-managing with the benefit of admin and rules support"

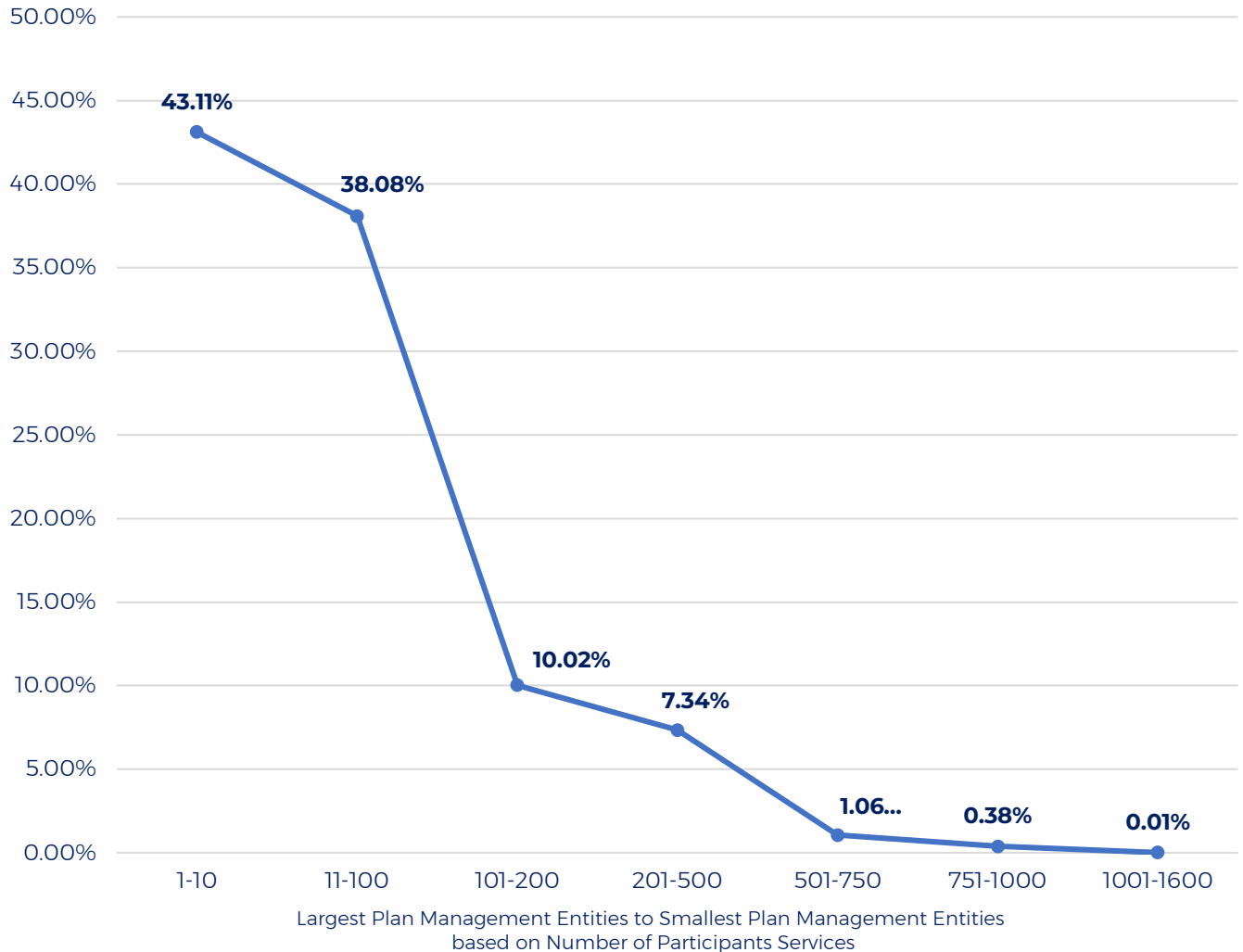
Kylie – South Australia

PLAN MANAGED PARTICIPANTS At 30 June 2023 - BY AGE



PLAN MANAGEMENT MARKET CONCENTRATION

RPMP MARKET SHARE BY PERCENTAGE
OF PARTICIPANTS BEING SERVICED



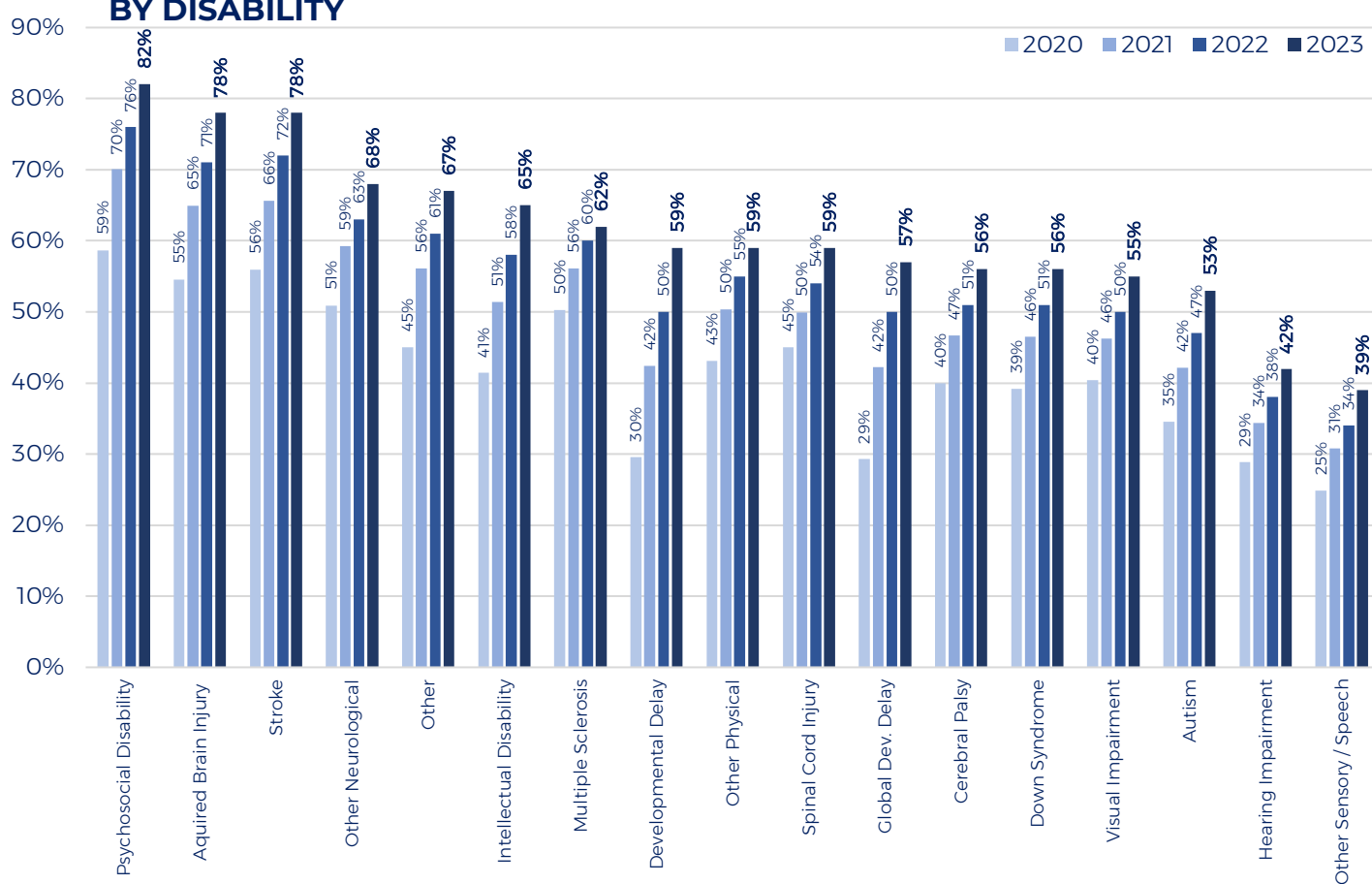
As at 30 June 2023 there are 1458 active Registered Plan Management Providers, however more than 43% of participants are serviced by the ten largest Plan Managers with almost 98.55% of participants being serviced by the just 500 providers.

There are 958 Plan Managers delivering service to just 5,033 NDIS Participants.

DIA recognises that some of these providers will be delivering service in very small community settings.

Whilst DIA welcomes and champions new entrants into the market, it is apparent that it is difficult for new entrants to establish themselves when pricing is structured for long tail efficiency and not market transition or innovation.

PLAN MANAGED PARTICIPANTS BY DISABILITY



WHY DO SO MANY NDIS PARTICIPANTS PLAN MANAGE THEIR NDIS FUNDS?

As a part of DIA's market monitoring, in 2023 DIA undertook a number of surveys to better understand why participants plan manage their NDIS funds.

DIA had responses from 2500 participants, 1850 carers and 650 legal decision makers. Respondents said the reasons they chose to Plan Manage their funds included:

- ☐ Greater choice and control;
- ☐ Increased self direction;
- ☐ Increased support to navigate the NDIS;
- ☐ Access to broader supports market;
- ☐ Greater control over how their funds are used;
- ☐ Less interaction with the NDIA;

- Brokerage and support to negotiate better support / pricing arrangement;
- Ability to pay up front for a support and seek a reimbursement;
- Plan Managers act at the direction of their client – the NDIS Participant. Plan Managers are not legal decision makers or substitute decision makers rather support and act in the interest of the the participant; and
- Greater participant support to be an active consumer and self direct their life.

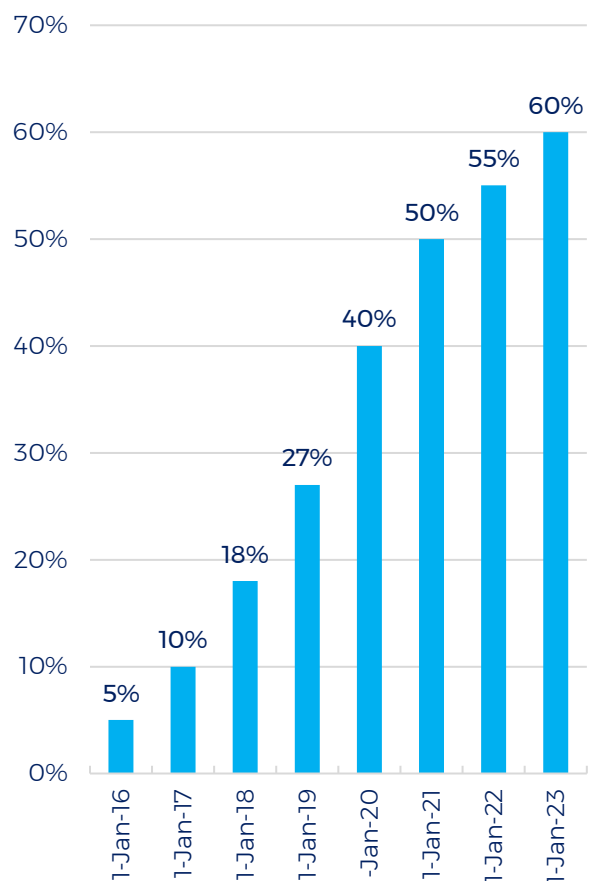
“I get the best of both worlds, the choice and control of Self-Managing with the benefit of help with admin and support to understand NDIS rules, which there are so many.”

*Kylie
Participant
South Australia*

“Plan Management has changed my life. I live in a rural community with no providers for the supports I need. Plan Management has given me the ability to think differently to find providers.”

*Michael
Participant
Queensland*

Incremental Distribution of Participant Plan Budgets managed by Plan Managers over time.



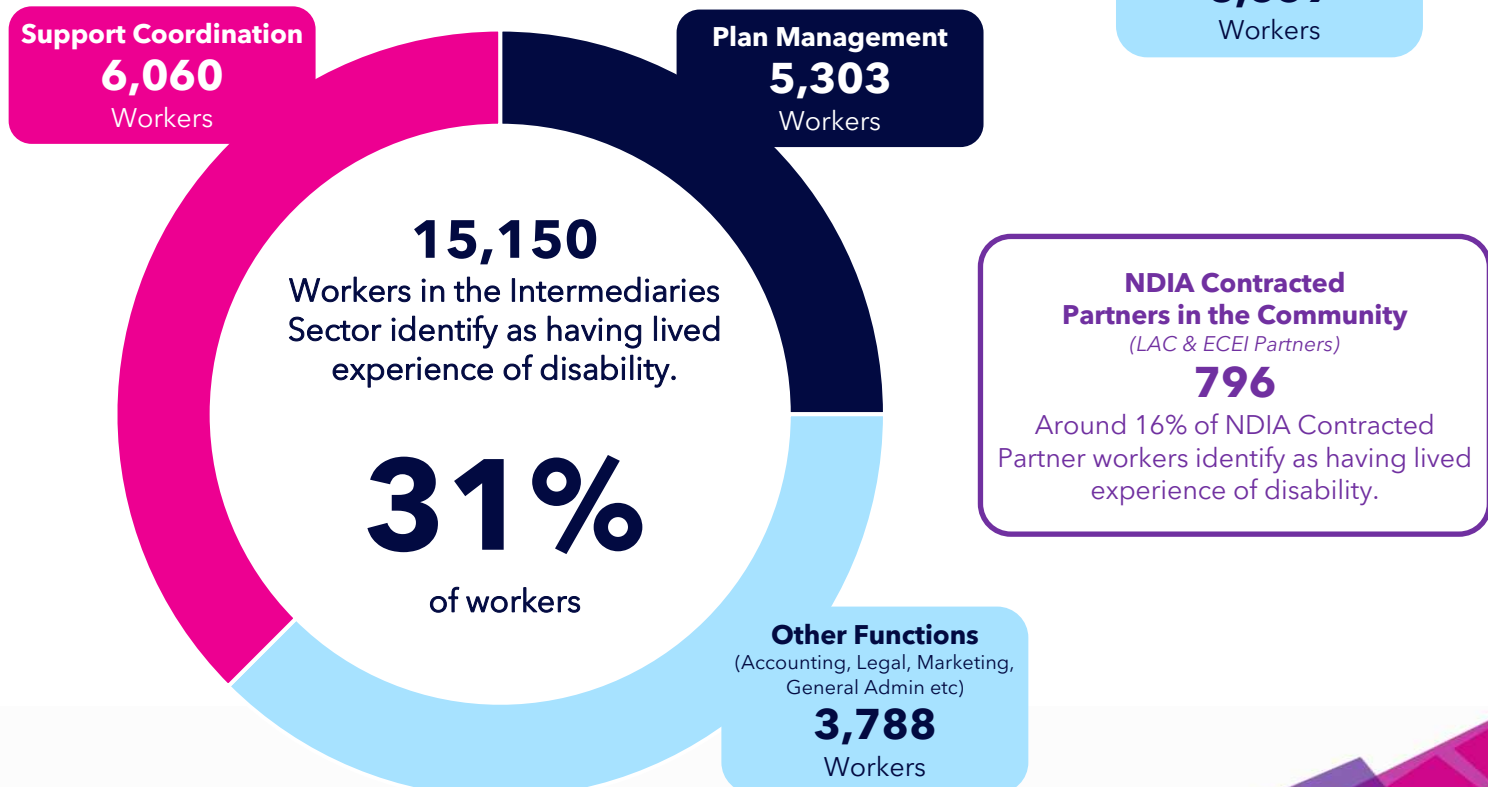
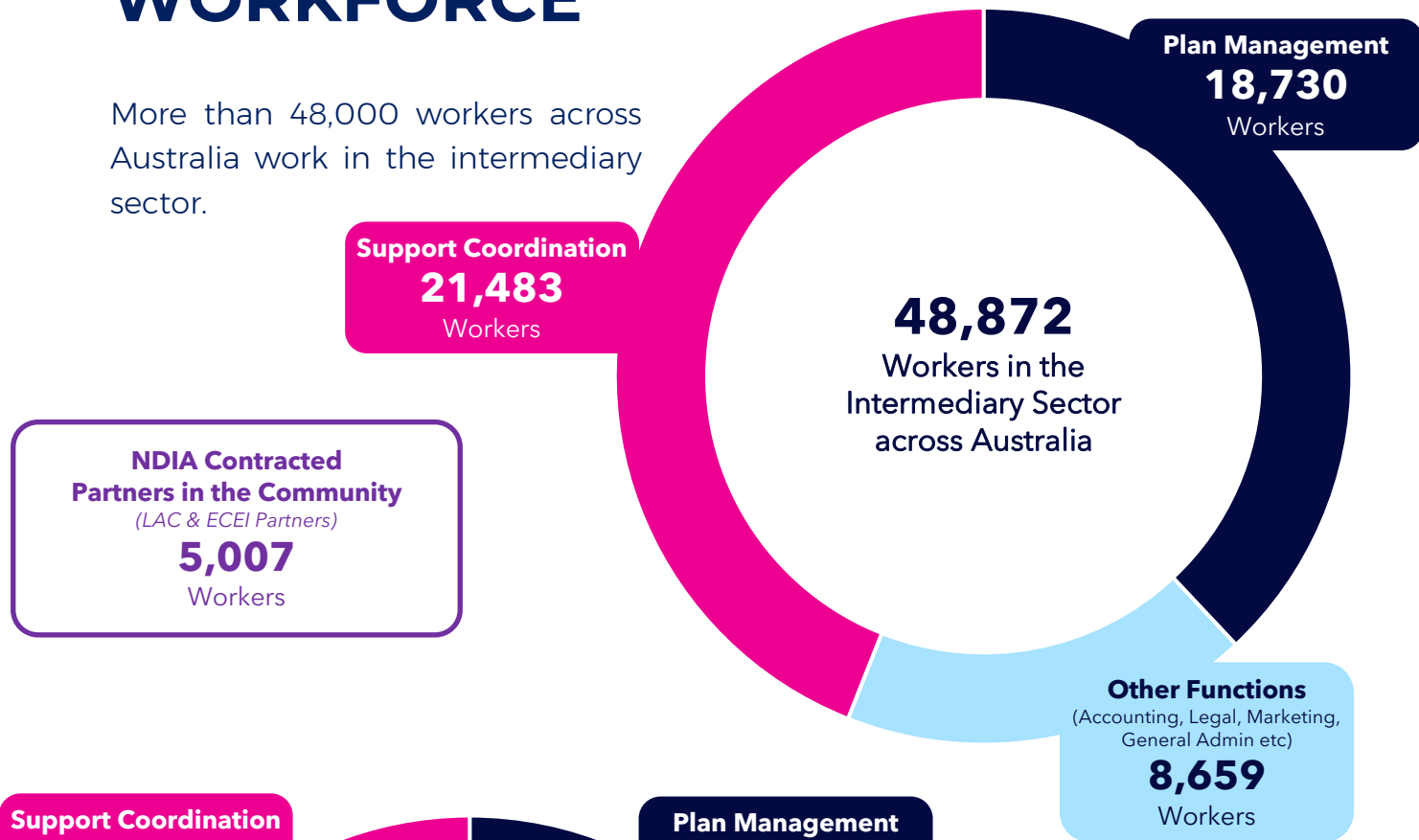


“After years of only being able to get a job working for minimum wage, I am now working in in a Plan Management business, getting paid a decent wage and using my skills!”

*Paula
Participant and Plan
Management Employee*

INTERMEDIARY SECTOR WORKFORCE

More than 48,000 workers across Australia work in the intermediary sector.



PLAN MANAGEMENT WORKER SKILLS

This is not an exhaustive list of all skills and is provided to demonstrate the key differences in skill set between Plan Managers and Support Coordinators.

Base Level Skills and Capabilities

- ☐ General Disability Awareness and Knowledge.
- ☐ Written and oral communication.
- ☐ Organization and attention to detail.
- ☐ Analytical and problem-solving skills.
- ☐ Time management.
- ☐ Mathematical and deductive reasoning.
- ☐ Critical thinking.
- ☐ Active learning.
- ☐ Clerical knowledge.
- ☐ Basic IT Proficiency such as with Microsoft Office Suite.

- ☐ Be responsive to a Participants Aboriginal and/or Torres Strait Islander identity.
- ☐ Be responsive to a Participants culturally and linguistically diverse identity.
- ☐ Be responsive to a Participants LGBTIQ+ identity.

Specialised Skills

(These may be spread across a team)

- ☐ Financial reporting and analysis (Financials software platforms).
- ☐ Financial Validation Skills.
- ☐ Account reconciliation.
- ☐ Software Skills
 - o Compliance software.
 - o Spreadsheet software (Excel, Google Sheets).
 - o Project management software (SharePoint, Oracle).
 - o Database reporting software.
- ☐ Advanced Interpersonal Skills (for those workers in direct contact with NDIS Participants).
- ☐ Participant check in competency.

SUPPORT COORDINATION WORKER SKILLS?

This is not an exhaustive list of all skills and is provided to demonstrate the key differences in skill set between Support Coordinators and Plan Managers.

Level 1 - Supports Connection Worker Skills and Competencies

- ☐ Disability Awareness and Knowledge.
- ☐ Active Listening with Empathy
- ☐ Written and oral communication.
- ☐ Cultural and Social Competency.
- ☐ Patience.
- ☐ Advocacy (Empowering and Amplifying Participant voice).
- ☐ Organization and attention to detail.
- ☐ Problem-solving skills.
- ☐ Time management.
- ☐ Active learning.
- ☐ Case Note Taking.

- ☐ Critical Thinking.
- ☐ Basic IT Proficiency such as with Microsoft Office Suite.
- ☐ Participant check in competency.

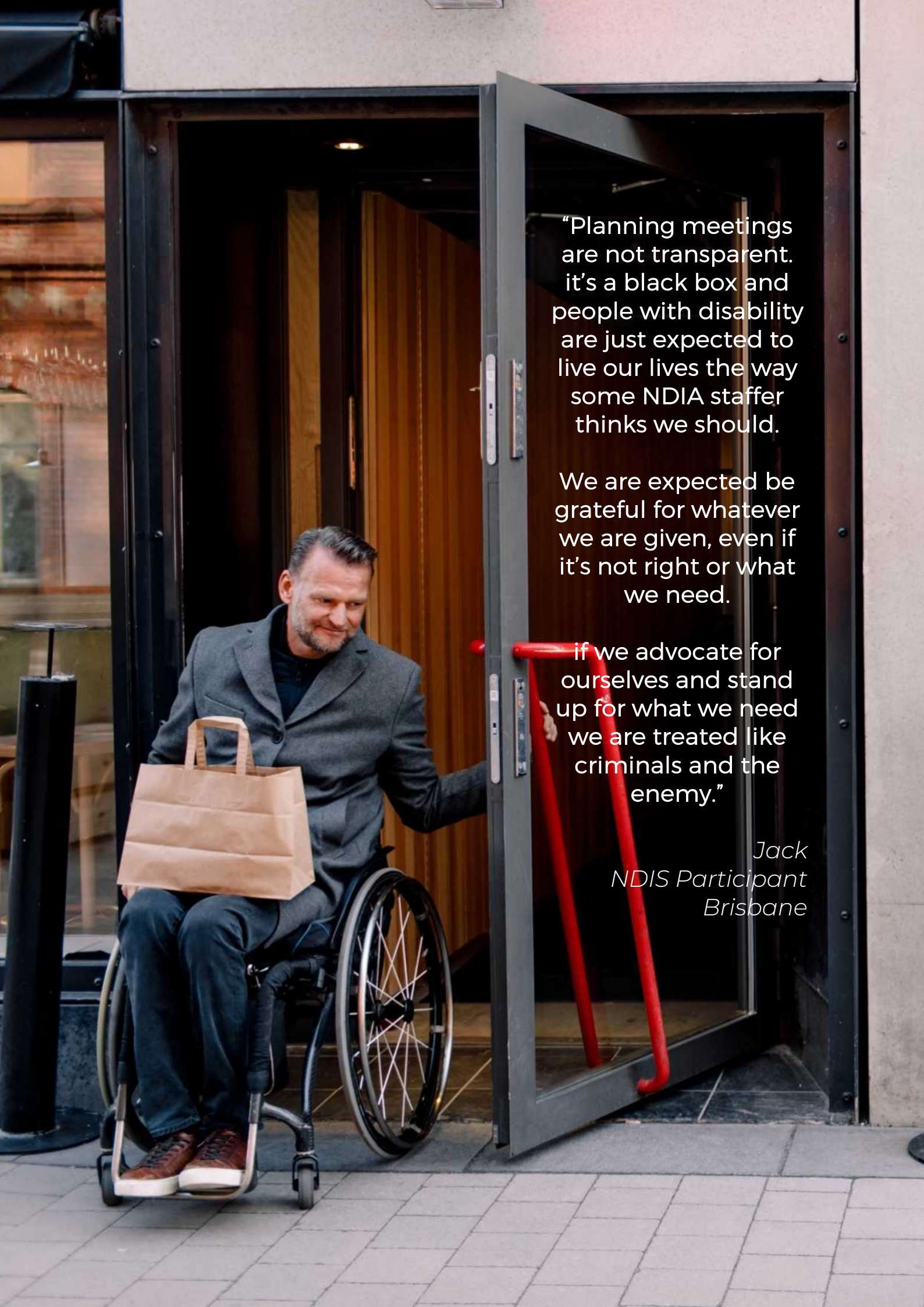
Level 2 – Coordination of Supports Worker Skills and Competencies

- ☐ All the Skills from Level 1 however delivered at a higher competency and proficiency.
- ☐ Emotional compartmentalisation.
- ☐ Understanding of laws and regulations around more complex support needs.
- ☐ Understanding of mainstream interfaces (Health, Justice, Social Housing, Education etc)
- ☐ Ability to interpret information into action.
- ☐ Coach, refine and reflect service approach skills.
- ☐ Self-awareness and self-regulation skills.
- ☐ Outcomes monitoring skills.

- ☐ Leadership and Management Skills.
- ☐ Service Orientation Skills
- ☐ Observation Skills.
- ☐ Risk Assessment, Planning and Mitigation skills (such as for crisis).
- ☐ Researching, documenting and reporting skills.
- ☐ Understanding of and navigational skills within multi-jurisdictional service environments.
- ☐ Understanding of home and living settings.
- ☐ Integrated support design skills.
- ☐ Consulting and working with other health professionals.
- ☐ Supervision Skills.
- ☐ Understanding and implementation of Participant led choice and control approaches in settings where a Participant might not be their own legal decision maker.

Level 3 – Specialist Supports Support Coordination Worker Skills and Competencies

- ☐ All the Skills and competencies from Level 1 and Level 2 however delivered at a higher competency and proficiency.
- ☐ Often allied health trained and/or qualified.
- ☐ Researching to improve understanding of disability related issues and to improve support responses.
- ☐ Intergovernmental representation skills.
- ☐ Complex Service Planning Skills.
- ☐ Multiple complex cross service systems navigation and integration.
- ☐ Supervision Skills.
- ☐ Remote implementation oversight competency, where complex service plan is implemented by a participants circle of supports.
- ☐ Understanding of the risk factors experienced by each participant with high-risk and/or complex needs.

A man with a beard, wearing a grey blazer and dark trousers, is seated in a wheelchair. He is holding a large brown paper shopping bag in his lap. He is positioned at the threshold of a doorway, with his right hand resting on a red metal handrail. The doorway is open, revealing a dark interior. The floor outside is paved with light-colored tiles. The text is overlaid on the right side of the image.

“Planning meetings are not transparent. it’s a black box and people with disability are just expected to live our lives the way some NDIA staffer thinks we should.

We are expected be grateful for whatever we are given, even if it’s not right or what we need.

if we advocate for ourselves and stand up for what we need we are treated like criminals and the enemy.”

*Jack
NDIS Participant
Brisbane*

ALL ROADS LEAD TO NDIA PLANNING

The NDIS was created to give people with a permanent and significant disability choice and control over what supports they needed, who would deliver them, how and when they would be delivered.

However, the implementation of the NDIS has not provided this choice and control to people with a disability, and we are seeing a return to the practices it was supposed to solve, such as inadequate funding of supports, deficit-based assumptions and assessments about people, and huge delays in plan reviews (now called re-assessments), change of circumstances requests, early plan review requests and review of a reviewable decision requests.

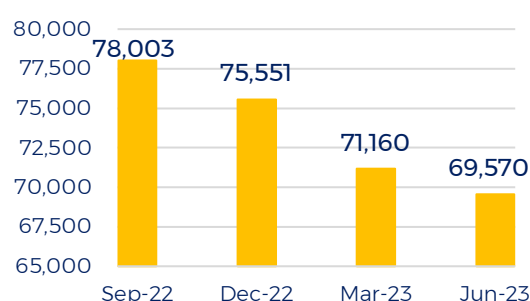
Since the NDIS commenced post trial sites in 2016 the NDIA has had significant difficulty in solving for a unique challenge that is a fundamental tenant of the NDIS, Individualised Funding. No other social insurance scheme or welfare

scheme even attempts to deliver person centred funding to the level of the NDIS.

The challenge to resolve is how do you undertake meaningful, quality-based planning for the number of Participants within the NDIS, which is now over 610,000.

Over the 2022-23 Financial Year the NDIA's undertook 294,284 Plan Reviews (Plan Reassessments). DIA members report that a large percentage of these are roll overs or extensions, whereby the NDIA offers a NDIS Participant the same plan again or their plan is automatically extended because a full Plan Reviews (Plan Reassessments) has not been carried out prior to the current plan expiring.

These are broken down by each quarter:



The issue here is how long will it take for the NDIA to develop a

quality NDIS Participant plan end to end? This issue has plagued the NDIA for many years.

Participants report to DIA that they have never felt that their planning process has been person centred and delivered in a way that supports their disability, rather participants have been forced to engage with Planning within a ridged and confided planning system that is designed to meet NDIA efficiency rather than Participant outcomes.

When the Scheme first commenced in trial phase, almost all participants were able to attend a face-to-face planning meeting.

The meetings allowed participants and key support people to discuss with the planner the types and amounts of supports they felt were 'reasonable and necessary'.

When the national rollout commenced in 2016, the NDIA moved to direct most participants into planning by phone.

To overcome this continued increase in the volume of planning the NDIA has tried with limited success to implement a range of

'tools' and 'approaches' that participants report to be traumatising including:

- Independent Assessments (forced functional capability assessments, conducted by NDIA contracted services).
- Planning exclusively by telephone or by telephone as a default.
- Planning led by LAC's with little to no engagement with the NDIA delegate (planner).
- Plans built by TSP's (Typical Support Packages). Where based on responses to particular questions asked during planning along with participants listed disability(s) drive the funding within a plan through the use of algorithms, reference data and benchmarks.
- 'My First Plan', where participants previous state system funding was just replicated rather than undertaking fulsome and detail planning process.
- Closed planning processes that force NDIS Participants to take significant legal

actions (including AAT) to exercise their rights. This includes not being issued with a draft plan prior to finalisation.

Whilst there has been some small and dispersed cultural change within the scheme over the past 12 months, there is a long way to go.

The scheme continues to see quality planning as a cost driver rather than an investment in scheme performance. Providers and participants alike report that over three quarters of scheme issues would be resolved fully or significantly via quality planning and funding within participants plans.

It's easy to see that quality planning and funding would:

- ☐ Reduce the number of reviews and appeals.
- ☐ Reduce the number of unscheduled plan reassessments (particularly where participants run out of funding early).
- ☐ Reduce the number of change of circumstances

where participants do not have the funding room to absorb changes in their normal living situation and circumstances.

- ☐ Reduce market and provider related pain points where supports are underfunded or expected to be delivered contrary to the direction of attending health professionals.
- ☐ Reduce quality disparity of market supports, as quality planning and funding would have quality and compliance costs built in.

DIA is aware that most Participants expect that they will receive a draft plan before it is approved and are then disappointed when they discover that this is not standard practice.

Even the most well prepared and supported Participants that provide good quality information at the time of their Pre-Plan meeting to justify the supports they are seeking, rarely have their expectations met in the Plan or what they believed would be included in the Plan during the pre-Plan meeting.

It has often been quoted that the current planning process is not planning but rather a budget negotiation. This is not the experience of the vast majority of Participants.

Rather participants report that they gather and submit evidence of the supports they require, which the NDIA is not clear on specifically what is needed, they provide this evidence along with answering standard form questions by either an LAC or NDIA Planner and then it is processed through a 'black box' with a plan being delivered to the participant weeks later.

This then forces Participants to undertake lengthy, stressful and often costly actions to have plans corrected and adequately funded.

Since the Productivity Commission's report of October 2017⁵, Typical Support Packages ('TSP') have been introduced which has in the main resulted in less individualization in Plans.

The current 'Guided Planning Process' sees a Participant answering a series of standard form

questions and then a computer creates a plan with amounts. A delegate (Planner) then only has a small window of adjustment ability, somewhere in the neighbourhood of +/- 10% without seeking higher level approval.

DIA has heard directly from Delegates (planners) that they have constant pressure to meet specific performance KPIs. These include the number of plans completed within a given period and the volume of plans being sent for higher delegation, i.e. plans outside of the funding window provided by TSPs.

The NDIS focuses on diagnostics rather than function, meaning that a person with severe functional impairment who is not in a specific list of disabilities might struggle to get support that they need.

This results in plans that are often not adequate to support needs, meaning services withdraw or are not supplied to begin with. This leaves people at risk of harm and increased vulnerability.

NDIA guidance material outlines the roles of plan developers and

plan delegates in completing planning tasks. The role of plan developer can refer to delegates and also includes contracted 'partners in the community', such as Local Area Co-ordinators (LAC) and Early Childhood (EC) partners (ANAO, 2020).

The NDIA refers to 'pre-planning' and 'planning' as different stages which encompass plan development and approval. Final plan approval can only be completed by a NDIA delegate. All other pre-planning and planning tasks can be completed by the plan developer.

The responsibility for plan development is determined by the participant streaming decision (ANAO, 2020), which DIA understands is not a publicised or transparent process, nor is it considered a reviewable decision under the NDIS Act.

Simply put there are three pathways:

- Early Childhood Early Intervention Pathway (Children), plans developed by an Early Childhood Early Intervention Partner.

- General NDIS Pathway which is split into 4 streams called General, Supported, Intensive and Super Intensive. LACs complete plan development for participants streamed as General or Supported. Plans for participants streamed as intensive or super intensive are developed by NDIA delegates (planners); and
- Complex Support Needs Pathway. Participants can be referred to the complex support needs (CSN) pathway if additional complex needs are identified.

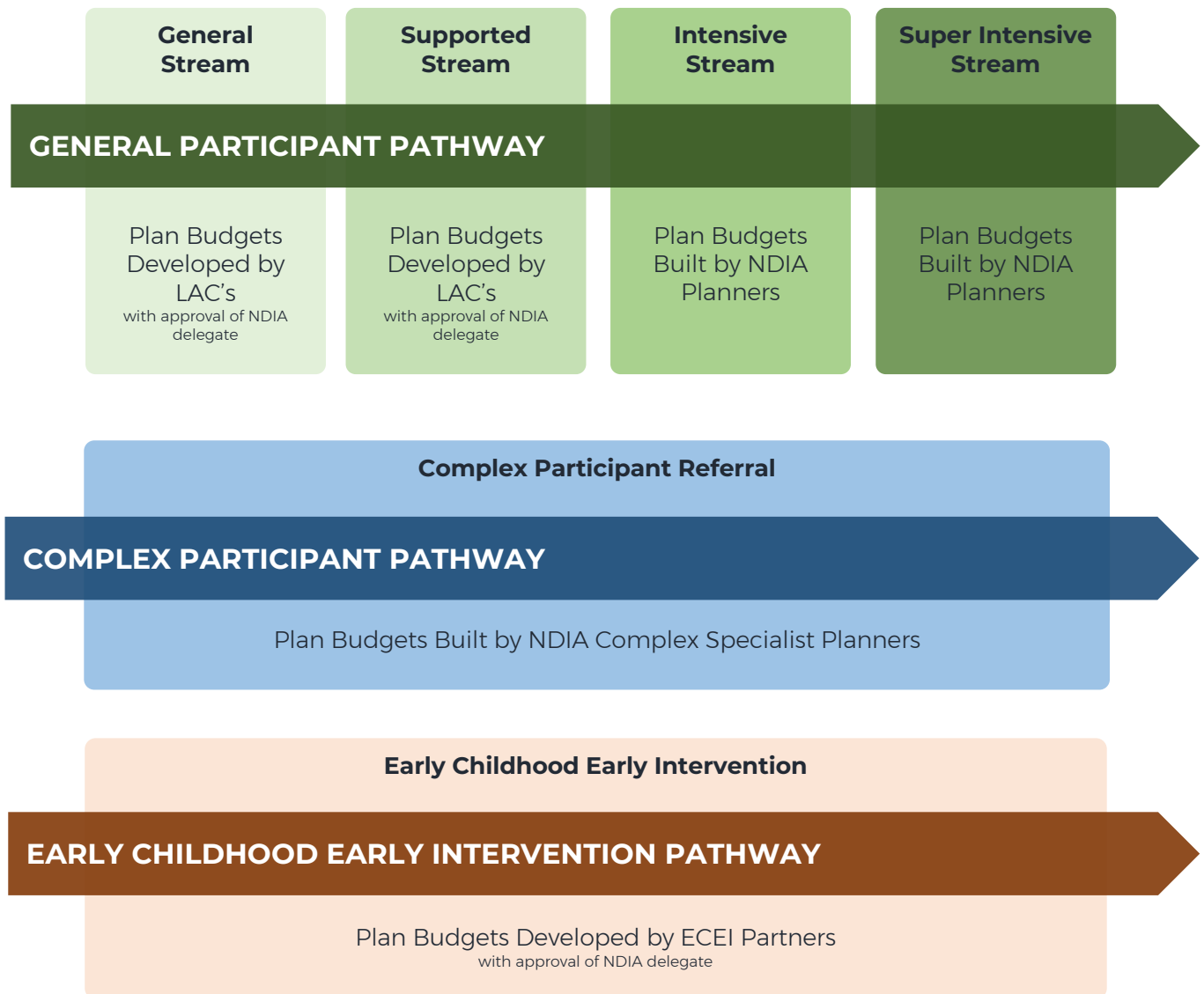
The NDIA has a series of planning delegation limits that require addition scrutiny prior to being approved by the NDIA, these include:

- if the plan budget is more than 10 per cent above the TSP; and
- If the total plan value exceeds the approver's delegation limit.

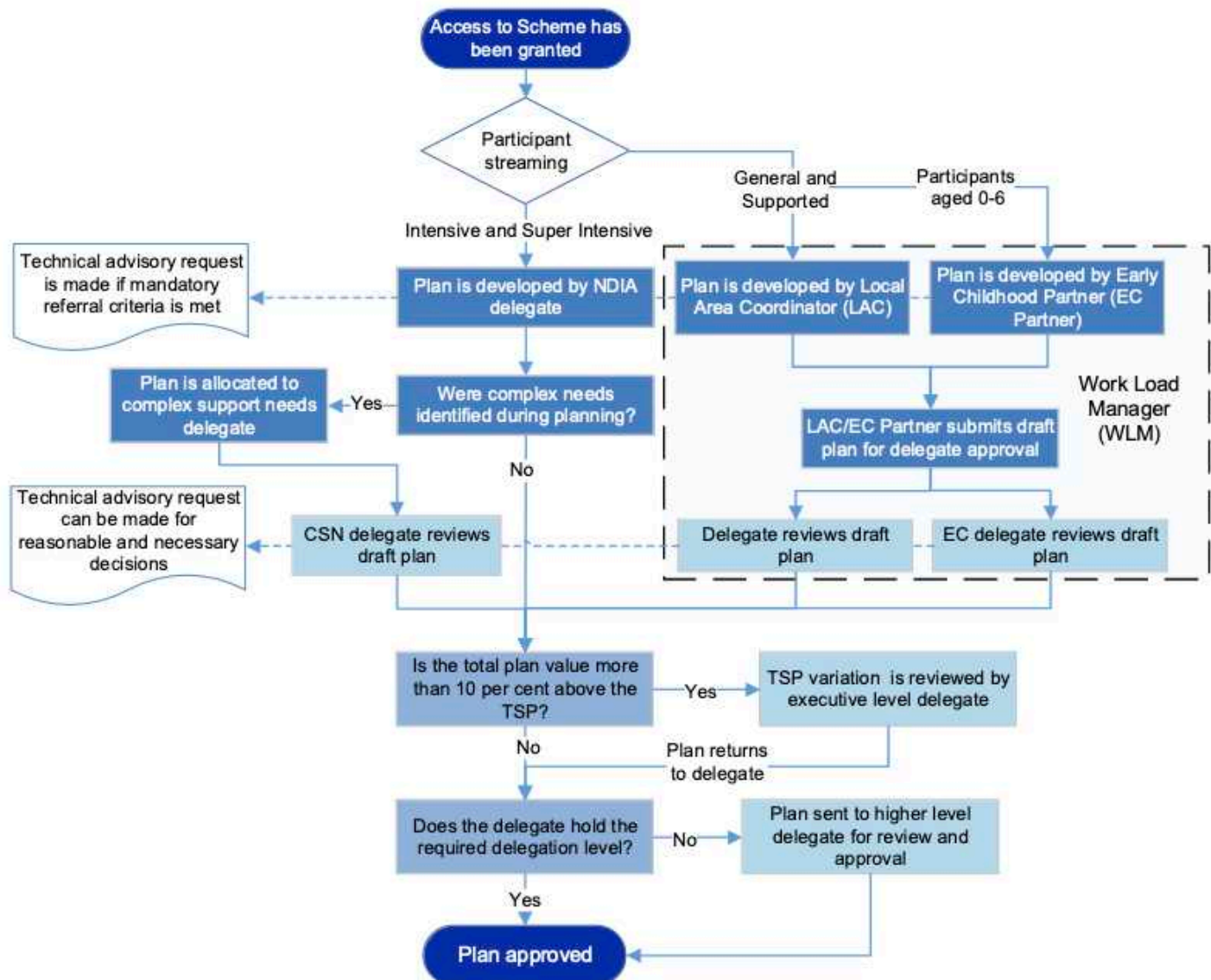
If the plan budget falls within these delegation limits, a plan can be developed and approved by the same individual.

Plans developed by LACs and EC partners require an extra step where the draft plan is submitted for NDIA delegate approval.

High level overview of the Current NDIA Planning Pathways and Streams



High level work roles and responsibilities for plan development and approval



DIA notes that there has likely been minor operational changes to this workflow since 2020 when it was published by the ANAO (ANAO, 2020).

However, for the purpose of this submission it demonstrates the closed streaming process that the NDIA undertakes which impacts how a participant is supported

through the NDIA Planning process. This combined with the use of TSPs and the KPIs set on planners drives planning outcomes with perverse impacts and consequences on the entire disability support and services ecosystem.

DIA notes that there is very little transparency around how a NDIS

Participant is streamed and what information, process and/or assessments are used to determine streaming. This lack of transparency and inability for a participant to challenge a streaming decision made by the NDIA limits a participant's ability to ensure their planning process being undertaken in a collaborative way taking detailed account of their needs.

People with disability must have true choice and control in every step of the NDIS process, from access, to planning and using their supports.

THE CONDUCT OF PLAN DEVELOPERS (LACs & ECEI PARTNERS) AND DELEGATES (NDIA PLANNERS)

Plan developers (LACs & ECEI Partners) and delegates (NDIA Planners) are tasked with the essential role of analysing the information provided in advance of, and during the planning meeting(s) to develop a statement of participant supports.

This statement is meant to outline the types and amounts of supports that will be funded under the NDIS. In developing the plan, it is vital the

plan developer or delegate is able to balance the participant's personal circumstances and needs against the 'reasonable and necessary' criteria set out in legislation.

Unfortunately, DIA continues to receive reports of plan developer or delegate who have demonstrated a fundamental lack of understanding of certain disabilities and, even more disappointingly, of disability generally. Some stakeholders have told DIA about plan developer or delegate who asked parents when their child was likely to 'recover' from a life-long disability like down syndrome, and others who told people with psychosocial disabilities they should 'try to be more positive' (DRC, 2023).

DIA understand that, in the early days of the Scheme, many plan developers or delegates had allied health professional backgrounds and, in turn, likely had a better practical understanding of disability.

For many reasons, presumably including the challenges in retaining highly qualified staff when the disability market is expanding, the availability of local staff with

professional backgrounds in allied health delivering plan development has significantly reduced and is now seen as an administrative function not a function associated with the delivery of outcomes for people with a disability.

As commented above, DIA notes the significant volume of this highly skilled workforce with backgrounds in allied health have left the NDIA and partners in the community (LAC's & ECEI Partners) to work in the intermediaries sector as a Support Coordinator, Plan Manager or even Psychosocial Recovery Coach.

BUDGET BASED APPROACHES TO PLANNING

Our discussions with stakeholders indicate that many participants and families are uncomfortable with the budget approach used in plans generated by the reference packages.

They point to the way that supports are bundled in the budget, rather than accounted for separately, which makes it difficult to assess if a participant's needs have been

adequately considered and accommodated in the plan.

DIA understands that separating the budget development from planning for how those funds might be spent is aimed at providing greater choice and control, whereby participants can spend money within budgets with greater control rather than being limited by prescribed amounts being allocated to specific supports.

On the other hand, stakeholders have argued this approach does not provide for adequate transparency in decision making and essentially puts the onus on the person with disability or their supporters to reverse-engineer funding to work out precisely what they can buy with the budget allocated and to work out if this is sufficient for the participants' needs.

No amount of plan or budget flexibility will overcome inadequate funding. For people with a disability adequate funding equals opportunity.

Stakeholders suggested that most participants would not be able to complete such spend planning

based on prescribed generalist funding without significant assistance and indicated they would need to seek additional funding for support coordination specifically for this task, noting that the current LAC workforce is not capable of undertaking these activities at the require volume or level of participant support need complexity.

POOR PLANNING FOR CRISIS

Our discussions with stakeholders indicate that there is far too often little consideration for how moments of crisis will be managed or handled.

Participants are, in the main, not funded to pre-plan for potential crisis situation.

This too often leaves Support Coordinators to deliver crisis support to meet its regulatory obligations without funding or the ability to seek payment for services rendered.

Case Study in their own words Don – 49 Years Old with an intellectual disability.

“I’m 48 years old and two years my mum died. Mum was my main carer. I am still very sad she’s gone.”

*Don
Participant
Victoria*

“I’ve been Don’s Support Coordinator for 3 years; was considered to be in a sable position, despite the age of Don’s mother (primary carer) and only family.

Each year we asked the NDIS to fund some Support Coordination hours specifically to plan for what will happen when Don’s mother is no longer able to support Don.

Each year this has been rejected by the NDIA as the NDIA considered this to be a ‘parental responsibility’ despite the funds being requested specifically to plan the disability supports needed.

Two years ago, Don’s mother (aged 81) passed away.

At a time when any member of the Australian public would be taking the time to grieve and work through the passing of a parent, Don instead was thrust into needing a change of circumstances, plan review and new plan to fund the daily care that his mother was providing, as well as

support to establish new legal decision-making arrangements.

This was well over 150 hours of work, none of which was funded by the NDIS as Don's plan, despite repeated requests, only contained minimal funding for Support Coordination for plan implementation.

As a Support Coordinator we could not in good conscience cease services as they were not funded, whilst Don was in crisis and needed rapid response and intensive support.

End to end the process took more than 5 months. For these five months we had to support Don and find ways to ensure he was provided with the support he needed to get through the day.

Some of the arrangements we had to set up were probably not completely in line with the intent of NDIA policy, but we had no other option – we stretched to almost breaking point how far Don could 'use his funds flexibly'.

This issue was completely foreseeable, yet the NDIA was not interested in looking beyond a single plan period.

For Don to get through this period in a supported manner now we are out of pocket more than \$15,000, some of his support workers had to volunteer and donate their time so we could get him through.

We are also grateful to DIA for escalating the issued and putting pressure on the NDIA to expedite

matters, wished we had been members earlier.

It is completely wrong for a government department to expect and take advantage of the sector because the NDIA are unwilling to look wholistically at a person's situation and be able to be responsive to deal with crisis.

Don is doing well and is now back in a stable situation.

*Paula
Support Coordinator
Victoria*

"Without Paula, I would have ended up in hospital or worse."

*Don
Participant
Victoria*

NDIS PLANS NEED TO BE SIMPLER AND EASIER TO UNDERSTAND

It's time for the NDIA to be real with participants and the provider market. Funding under the NDIS is as complex and nuanced as the participants it seeks to support. Blanket rules and blunt instruments often don't achieve what is intended for either the NDIS or participants.

Trying to resolve this via more simplified and easier to understand plans is admirable, however Government's appetite to accept the consequences of simplification, namely broader scope and opportunity for misuse of government funds remains limited.

In DIA's view the answer here is to fix the way participants are supported to navigate the complex and nuanced scheme. The current navigational infrastructure in the NDIS is fragmented and is dictated to participants.

This results in an inefficient mix of NDIA Partners (LACs/ECEIs), Support Coordinators, support workers, advocacy organisations, family members, friends and other informal supports. A participant is not given choice on how they wish to coordinate their plan.

The NDIA's original market approach document, Statement of Opportunity and Intent (NDIA, 2016), the primary reference for the agency's role as market steward, recognises Intermediaries, such as Support Coordination, to support navigation as the critical third factor for a high-performing NDIS market.

While the current arrangements assume that only the most disadvantaged require navigational support and capacity maintenance and/or building (as demonstrated by only about 40 per cent of NDIS participants being funded for support coordination), our research, which is echoed by the IAC and Tune Review, indicates this is not the case (Tune, 2019; DIA, 2020; IAC, Jul 2019; Vincent & Caudrey, 2020; Robertson SC, 2020).

Only the most confident, educated and resourced participants with strong support networks can navigate and negotiate their way to good outcomes on their own. Even then, these outcomes often come at considerable cost to the time, energy and wellbeing of the participant and/or their family. In practice, DIA are seeing a sizeable percentage of participants struggling to reach the services they need, particularly when being supported by a LAC to implement their plan.

Under the current plan implementation and navigational model, for those without funded support coordination (around 60% of all participants), LACs are the primary source of 'official' navigational support. Our members

and participants regularly report that the quality of LACs is a persistent and systemic issue, in some cases finding an appropriately skilled local area coordinator can be almost impossible; this is further evidenced in the Tune Review (Tune, 2019; Vincent & Caudrey, 2020; Robertson SC, 2020).

Nuance is critical in both the understanding of and application of disability supports (Hunter & Ritchie, 2007), the NDIA must consider and appropriately communicate how any and all exceptions, exemptions, circumventions and/or short comings or gaps in the holistic funding of supports a participant might receive from broader systems of support.

DIA strongly believes that it is imperative that numerous strategies are implemented to ensure participants understand their plan, and how funding can be spent. The NDIA should provide a break down about how the NDIA Delegate has calculated what supports and how much funding has been apportioned to them in determining the total finding package for a participant.

In DIA's view, the NDIA needs to provide clear direction and guidance about services outside of the scope of NDIS funding (Carey, et al., 2019). For support requests that are not funded by the NDIS, participants and providers need to be given greater direction and specific reference to the expected mainstream, informal, or community support that the NDIA determines should be providing it instead (Commonwealth Ombudsman, 2020).

Further, a comprehensive list on what participants should not spend their flexible funding on, in most instances, also needs to be provided.

Protections need to be considered for participants who cannot easily or quickly form a comprehensive understanding of supports that can and should be funded by services outside of their flexible funding.

Finally, the NDIA must introduce a better way for people with a disability to ask questions and find out further information (IAC, Oct 2019), where this is captured and published, in a de-identified way, to build a searchable case or question library.

This would allow anyone to find the answers out to their questions themselves.

Such a model has been successfully implemented in other Government settings including the Australian Tax Office, Australian Securities and Investments Commission, Australian Energy Regulator, the Environment Protection Agency and many more.

NDIS PARTICIPANTS NEED SUPPORT TO UNDERSTAND AND USE THEIR PLAN

To ensure participants are prepared for their planning meeting and are supported to make informed decisions, it is imperative that additional funds are made available for Support Coordinators to conduct pre-planning activities for those participants already supported with a Support Coordinator.

DIA member consultations indicated that this would be extremely beneficial even if this is a participant's first plan. Additionally, a Support Coordinator's ability to provide expert and reliable information, pertinent to the

geographical area the participant will be supported in, is crucial for a delegate to use in their decision making for the overall success of the NDIS.

Providing relevant tools and templates in the participant's preferred communication mode is also considered crucial to prepare for a planning meeting and to ensure informed decision making.

Tools and templates that assist a participant to list regular and irregular supports in their preferred language and communication style, need to be provided but also explicitly addressed by the planner or delegate at the planning meeting in conjunction with a draft plan.

A Support Coordinator is often required to submit reports to the NDIA about the provision of their services and supports to participants.

The reporting timeframes and method to submit reports are outlined in the Request for Service.

DIA has received regular and numerous reports that whilst they spend a number of hours providing detailed and required reports to the NDIA, many of them, if not most, go unread are often viewed by the NDIA as just:

"Support Coordinators asking for more money"

NDIA Planner Sydney

If the NDIA is to require reports to be submitted from Support Coordinators, which in DIA's view they should, these reports should be read and taken with respect and recognition of the expertise of the professional writing them.

Provider Case Study: We don't have time to read them!

"I attended a NDIA Plan Review meeting with a participant that we support. When I arrived for the meeting, I introduced myself to the plan and asked if she had received a copy of my Plan Review report."

"I always bring a printed version with me as sometimes the NDIA loses them or they don't get uploaded properly."

To my horror the planner replied Yes, but haven't read it, we don't have time".

Support Coordination Provider –
South Australia

As a result, DIA planners must be required to always read this submitted reports, evidence and documentation prior to the planning meeting, and discuss this in detail at the meeting.

Access to culturally safe and diverse planning meetings needs to be ensured where a participant has cultural, gendered, language or other diversity preferences. Every attempt must be made to meet these needs at the planning meeting. When this is a subsequent planning meeting for participants who have utilized support coordination, there needs to be a significant interface at this point for delegates to ensure diversity needs are met at planning stage.

For both preparation of a planning meeting, and to support participant decision-making, it is imperative that the participant and their chosen supports have all information in enough time to adequately prepare for a planning

meeting, including copy of Independent Assessment, Draft Plan generated by NDIA TSPs (Typical Support Packages).

Finally, a participant should not be expected to make firm decisions about their plan at the time of the planning meeting. For informed decision-making, a participant may need to seek additional support to understand the points raised and discussed at a planning meeting.

DIA SUBMITS

1. Plans should be built from the ground up with the support and engagement of a NDIS participant. Not simply a top-down reference package or one size fits all or fits most approach.
2. The provision of a draft plan, opportunity for discussion of any discrepancies between expectation and reality and justification provided by the Planner, would have an enormous positive impact on the relationship with the Participant, significantly enhance transparency and accountability whilst providing the opportunity for any unforeseen gaps in evidence to be provided.
3. NDIA Planners should be trained to be disability experts that can be given greater levels of delegation to support the needs of a NDIS Participant.
4. The NDIA should hire more people with disability. A scheme run for people with disability should be a scheme run by people with disability.
5. Key attributes that must be at the core of the NDIA's recruitment policies:
 - ☐ disability awareness
 - ☐ cultural competency
 - ☐ understanding of the local population and culture.
6. The NDIA partner with providers to embed NDIA staff for short periods of time, in appropriate risk assessed positions to under the impacts of NDIA planning decisions.

"Price regulation based solely on long tail efficiency has failed. It has not delivered outcomes for participants, nor has it secured scheme sustainability.

It is simply short-sighted economics that fails to invest in participants or a quality support market."

*Rodger
Participant Nominee
Sydney*



NDIA PRICE REGULATION HAS FAILED TO DELIVER QUALITY AND INOVATION

Prior to DIA making its 2023 NDIA Annual Price Review Submission (Price Review Submission), DIA sought clarity on how the Support Coordination and Plan Management Price Limits were set.

DIA has been forced to make numerous requests under the Freedom of Information Act 1982 (Cth) (FOI Act) to understand how the NDIA has set the price limit for Support Coordination and Plan Management.

The NDIA in its FOI decision IR21/22012 dated 18 November 2021, the NDIA said support items related to Plan Management and Support Coordination levels 2 and 3 *'were not set by reference to a specific cost model.'*

There is no reasonable way for the NDIA to be setting price regulation without a clear and transparent mechanism such as a cost model.

With no reference to a cost model the NDIA is simply setting price regulation on unfounded assumptions.

DIA has conducted an annual Benchmarking program sine 2020.

The most recent Benchmarking program included 965 individual responses, making it the largest benchmarking program within the Australian Disability sector.

The outstanding response to DIA's Benchmarking program has facilitated the development of robust, evidence-based Cost Models. These Cost Models were developed from empirical data collected from providers of intermediary supports and for the first time provides a clear and transparent pricing framework.

These cost models have formed the basis of DIA annual price review submissions for the previous three years.

To DIA's knowledge, no other benchmarking of the cost of intermediary supports has been conducted by the NDIA as a part of this Annual Price Review.

Despite overwhelming evidence from DIA, the NDIA made the decision to freeze the price limits for both Support Coordination and Plan Management for the fourth consecutive year.

DIA has seen increased volatility in the Support Coordination market, a flatlining of growth within the sector and intermediary service providers ceasing services and exiting the sector.

A part of a Support Coordinator's role, where funded, is to help Participants to understand and utilise their plan, break down information for them and help them understand their options and allow them to come to an informed decision.

The work required of an Intermediary can vary greatly from Participant to Participant. No two Participants, and no two plans are alike. The implementation of a Participant's plan will be affected

by many variables including geographical location, support needs, the Participant's goals, allocated funding levels and degree of informal support the Participant receives.

A Support Coordinator or Plan Managers fulfilment of their role in conjunction with the pricing freeze and the limited levels of funding provided in a Participant's plan for Support Coordination adds particular pressures on Intermediaries and is especially exacerbated in complex cases and at higher levels of support.

There are five key viability issues:

- (a) Pricing limits imposed by the NDIA (cap of \$100 per hour for Support Coordination L2);
- (b) Limited quantum of hours and value of support available in Participant plans;
- (c) Pricing limits imposed by the NDIA for Plan Management (cap of \$104.45 per month and \$235 for set-up which is once per plan);
- (d) inflationary pressures 7.8% to the December 2022 Quarter, with the associated rise in transportation costs,

operational costs, rents and workforce etc; and

Coordination (hours) within each Participant's plan.

- (e) Removal of ability for Plan Managers to claim an additional set up fee when the NDIA extends a NDIS Plan. Despite the work required for a Plan Manager being the same for Plan Extension as it is for a new plan.

The NDIA state that the average number of hours funded for Participants is around 30 hours per year. In DIA's view this should be the absolute minimum and not the Average.

The NDIA sets prices to drive long tail efficiency and not innovation or quality.

This results in NDIS Participants finding it more difficult to find a quality provider for service and an increased burden on to informal and community supports to support Participants with more complex support needs to navigate the scheme and live and ordinary life.

When the costs to deliver Intermediaries continue to rise each year (inflation, operational costs, rents and workforce pay rate raises etc) and yet the amount that can be charged is frozen for three consecutive reviews, providers are forced to find efficiency gains and reduced costs to remain viable.

A number of media articles have been written on this matter, with a number of high-profile providers withdrawing from the market.

This results in providers hiring workers with less experience and levels qualification that result in quality pressures.

In DIA's view price regulation must be set in a transparent way by an independent body that can weigh the considerations of the true costs of service deliver, quality, innovation, compliance and scheme sustainability.

This is further exacerbated by the low levels of funding for Support

SUPPORT COORDINATION BENCHMARKING RESPONDENT PROFILE

At the time of closing responses to DIA's benchmarking program, DIA had received 454 individual responses from Support Coordination providers. In terms of the survey's representation of the broader Support Coordination market, of the 454 responses received 89% identified as 'For Profit' and 11% as 'Not for Profit'.

Support Coordination Survey Responses by Organisational Structure

Structure	Number of Responses	Percentage of Responses
For Profit	404	91%
Not for Profit	50	9%
Not Stated	-	-

The respondent's coverage of the States and Territories showed a higher proportion of respondents in the three larger jurisdictions (NSW, Victoria and Queensland) which highlights the more local nature of Support Coordination organisations compared to the more national nature of the Plan Management market.

Support Coordination Survey Responses by Jurisdiction of Participants Serviced

Responses greater than the 454 responses received as respondents service multiple jurisdictions. Percentage sum greater than 100% due to multiple jurisdiction coverage of respondents.

Jurisdiction of Service	Number of Responses	Percentage of Responses
ACT	40	9%
NSW	163	36%
NT	32	7%
QLD	104	23%
SA	68	15%
TAS	32	7%
VIC	159	35%
WA	54	12%

The respondents were also asked the number of individual participant's that their organisation supports to identify the size of operations within the Support Coordination market.

The respondents classified as 'Small' represented 19%, 'Medium' represented 49% and 'Large' represented 32% of the survey.

Support Coordination Responses by Number of Participants Supported

Size by Number of Participants	Number of Responses	Percentage of Responses
Small	86	19%
Medium	223	49%
Large	145	32%

FINANCIAL RESULTS – SUPPORT COORDINATION

The survey responses showed that 80% of respondents reported that they made a Loss / Deficit or Break-Even, with only 21% of the respondents reporting a Profit / Surplus.

Support Coordination Responses by Financial Result

Financial Result '22	Number of Responses	Percentage of Responses
Profit / Surplus	90	20%
Loss / Deficit	282	62%
Break Even	82	18%
Not Provided	-	-

Analysis of the financial results data shows that organisations categorised as 'Small' and 'Medium' have a similar percentage of financial result as each other.

Organisations categorised as 'Large' have a lower percentage of respondents reporting a 'Profit / Surplus' financial result. This indicates that organisations of

a larger scale find it more difficult to deliver Support Coordination supports at a profitable level.

Percentage of Financial Result by Respondent Organisational Size

Size of Organisation	% Profit / Surplus	% Loss / Deficit	% Break-Even
Small	25%	55%	20%
Medium	21%	61%	18%
Large	16%	65%	17%

The organisational structure showed some minor differences in terms of financial results from the survey with the percentage of respondents reporting a Profit only significantly different for large providers. All other response is similar across the two categories.

Percentage of Financial Result by Respondents Organisational Structure

Structure	% Profit / Surplus	% Loss / Deficit	% Break-Even
For Profit	19%	62%	19%
Not For Profit	25%	59%	16%
Not Stated	-	-	-

Overall, the survey results showed that only 20% of the respondents returned a 'Profit / Surplus' for the 2022 Calendar Year with organisational structure playing only a minor factor in determining the financial outcome, with not-for-profit entities reporting marginal better financial performance of for-profit entities.

The survey results would indicate that there is a small benefit in being an organisation of a 'Small' size compared to those of a 'Medium' or 'Large' size in terms of the number of participants supported. With some further minimal benefit in being a not-for-profit entity.

This is further supported by anecdotal evidence which has been presented for the last 2 years, in which Support Coordination providers have indicated

the difficulty in developing and scaling up operations within the current pricing structure.

This is further supported in the data of market exits.

BENCHMARKING RESULTS – SUPPORT COORDINATION

The Support Coordination Survey consisted of series of areas of exploration. This year DIA requested a specific pay point to ensure greater consistency and specificity in responses. Any unreasonable responses that were outside a reasonable margin of error were followed up to confirm or be amended by the respondent.

General themes include:

- a. Viability Concerns.
- b. Market Exits.
- c. Increases in workforce costs with no ability to pass these on to the consumer given price limits.
- d. Inflationary pressures impacting operation and corporate overheads.
- e. Registration costs, respondents reporting registration audit costs of between \$8,000 to \$15,000.
- f. Increasing costs on compliance and reporting activities to both the NDIA and NDIS Commission.
- g. Inadequate quantity of support (volume of hours).

EMPLOYMENT CONDITIONS – SUPPORT COORDINATION

The common reference point in the disability sector for base pay conditions is the Social, Community, Home Care and Disability Services (SCHADS) Award which the NDIA use as a base for the Disability Support Worker Cost (DSW) model across four different levels.

The Support Coordination sector is overwhelmingly dominated by the SCHADS Award for both Participant Facing and Supervisory staff.

Percentage of Respondents by Award / Agreement – Workers (Participant Facing)

Award / Agreement	% of Respondents	% Shift in the past 18 months
SCHADS	92%	▲ 3%
Other	8%	▼ 3%

Percentage of Respondents by Award / Agreement – Supervisors

Award / Agreement	% of Respondents	% Shift in the past 18 months
SCHADS	91%	▲ 2%
Individual Agreement	6.5%	▲ 1%
Other	3.5%	▼ 2%

BASE RATE OF PAY - SUPPORT COORDINATION

The DIA benchmarking survey asked respondents to indicate base levels of pay for Levels 1, 2 and 3 Support Coordination and for 'Supervisory' workers at each of the three levels.

This year DIA requested a specific pay point to ensure greater consistency and specificity in responses. Any unreasonable responses that were outside a reasonable margin of error were followed up to confirm or be amended by the respondent.

Base rate of pay for Support Coordination Levels 1, 2 and with Supervisors

	Mean	10PC	25PC	50PC	75PC	90PC
Level 1: Support Connection - Worker	\$36.42	\$36.23	\$36.42	\$36.42	\$36.61	\$36.87
Level 1: Support Connection - Supervisor	\$47.86	\$47.67	\$47.86	\$47.86	\$48.06	\$48.42
Level 2: Coordination of Support - Worker	\$47.86	\$47.61	\$47.86	\$47.86	\$48.19	\$48.54
Level 2: Coordination of Support - Supervisor	\$58.05	\$57.82	\$58.05	\$58.05	\$58.36	\$58.49
Level 3: Specialist Support Coordination - Worker	\$68.22	\$67.94	\$68.22	\$68.22	\$68.34	\$68.52
Level 3: Specialist Support Coordination - Supervisor	\$72.20	\$72.04	\$72.20	\$72.20	\$72.41	\$72.61

The per hour base pay rate for Support Coordination Supervisors was consistent across organisational size and structure.

DIRECT ON-COSTS - SUPPORT COORDINATION

The DIA benchmarking survey asked respondents about the costs of employment associated with Superannuation entitlements, Annual Leave entitlements, Personal Leave entitlements, Long Service Leave entitlements and Employee Allowances.

This year DIA requested a specific amounts, dollars, hours and percentages to ensure greater consistency and specificity in responses. Any unreasonable responses that were outside a reasonable margin of error were followed up to confirm or be amended by the respondent.

Direct On-Costs for Support Coordination Levels 1, 2 and 3

	Mean	10PC	25PC	50PC	75PC	90PC
<u>Annual Leave</u>						
- Hours accrued in a year	152	152	152	152	152	152
- Loading	17.5%	0%	17.5%	17.5%	17.5%	17.5%
<u>Personal Leave</u>						
- Hours accrued in a year	76	76	76	76	76	76
<u>Public Holidays</u>						
- Hours of public holidays	106	91	106	106	114	121
<u>Superannuation</u>						
- 2022-23 Rate	10.5%	10.5%	10.5%	10.5%	10.5%	10.5%
- 2023-24 Rate	11%	11%	11%	11%	11%	11%
<u>Employee Allowances</u>						
- Allowance Rate	1%	0%	1%	1%	1.5%	2%

OPERATIONAL OVERHEADS - SUPPORT COORDINATION

The DIA benchmarking survey asked respondents about Operational Overheads including those costs which are in the operational control of the provider such as workers compensation costs, utilisation costs, supervision costs and workforce rostering and balance measures such as the share of the workforce that is permanent or casual, the extent to which overtime is used

by the business, and blending to a flat fee rate factoring afternoon, weekend and public holiday rates etc.

This year DIA requested a specific amounts, dollars, hours and percentages to ensure greater consistency and specificity in responses.

Any unreasonable responses that were outside a reasonable margin of error were followed up to confirm or be amended by the respondent.

Operational Overheads for Support Coordination Levels 1, 2 and 3

Total Operational Overheads per hour (\$)	Mean	10PC	25PC	50PC	75PC	90PC
Level 1: Support Connection	\$15.90	\$15.54	\$15.90	\$15.90	\$16.08	\$16.40
Level 2: Coordination of Support	\$35.88	\$35.69	\$35.88	\$35.88	\$36.19	\$36.34
Level 3: Specialist Support Coordination	\$88.93	\$88.61	\$88.93	\$88.93	\$89.26	\$89.58

CORPORATE OVERHEADS - SUPPORT COORDINATION

The DIA benchmarking survey asked respondents about Corporate Overheads including the costs incurred to run the administrative side of their business.

These costs include the accounting, human resources, legal, marketing, compliance and technology functions.

The NDIA in its Disability Support Worker Cost Model assumes that Corporate Overheads are 12.0% of direct costs. However, it also includes a temporary loading which recognises the variable costs of COVID and of adjusting to the new provisions in the Social, Community, Home Care and Disability Services Industry Award 2010 (SCHADS Industry Award) that were come into effect on 1 July 2022. DIA notes that Support Coordination Levels 2 and 3 did not receive this load despite the impacts of COVID19 and Changes to the SCHADS Award.

Our benchmarking program demonstrates that actual corporate overheads should, at a minimum, be considered at 14% of direct costs. This is due to several factors including increased inflationary pressures driving higher costs

of accounting, human resources, legal, marketing, compliance and technology functions.

This year DIA requested a specific amounts, dollars, hours and percentages to ensure greater consistency and specificity in responses. Any unreasonable responses that were outside a reasonable margin of error were followed up to confirm or be amended by the respondent.

Corporate Overheads for Support Coordination Levels 1, 2 and 3

Total Corporate Overheads per hour (\$)	Mean	10PC	25PC	50PC	75PC	90PC
Level 1: Support Connection	\$9.23	\$9.03	\$9.23	\$9.23	\$9.54	\$9.86
Level 2: Coordination of Support	\$14.22	\$13.95	\$14.22	\$14.22	\$14.35	\$14.66
Level 3: Specialist Support Coordination	\$25.60	\$25.23	\$25.60	\$25.60	\$25.85	\$26.12

SUPPORT COORDINATION COST MODEL

DIA propose the use of the below cost model,

Cost Model for Support Coordination Levels 1, 2 and 3

	Level 1 Support Connection	Level 2 Coordination of Support	Level 3 Specialist Support Coordination
Standard Hourly Rate	\$36.42	\$47.86	\$68.22

	Level 1 Support Connection	Level 2 Coordination of Support	Level 3 Specialist Support Coordination
Direct On Costs			
<u>Annual leave</u>			
a. No. hours leave accrued in a year (hrs/yr.)	152	152	152
b. Loading	17.50%	17.50%	17.50%
c. Proportion of leave taken	100%	100%	100%
Cost per worked hour	\$3.89	\$5.12	\$7.50
<u>Personal leave</u>			
a. No. hours leave in a year (hrs/yr.)	76	76	76
b. Loading	0%	0%	0%
c. Proportion of leave taken	100%	100%	100%
Cost per worked hour	\$1.66	\$2.18	\$3.10
<u>Public Holiday leave</u>			
a. No. hours leave accrued in a year (hrs/yr.)	106	106	106
b. Loading	0%	0%	0%
c. Proportion of leave taken	100%	100%	100%
Cost per worked hour	\$2.31	\$3.03	\$4.32
<u>Long Service leave</u>			
a. No. hours leave accrued in a year (hrs/yr.)	32.93	32.93	32.93
b. Loading	0%	0%	0%
c. Proportion of leave taken	100%	100%	100%
Cost per worked hour	\$0.72	\$0.94	\$1.34
<u>Superannuation</u>			
Superannuation Rate (%)	11.00%	11.00%	11.00%
Superannuation per worked hour	\$4.65	\$6.12	\$8.72
<u>Employee Allowances</u>			
Allowance Rate (%)	1%	1%	1%
Allowance Cost per worked hour	\$0.36	\$0.48	\$0.68
Cumulative cost/hour, after Direct On-costs	\$50.01	\$65.72	\$93.89

Cumulative increase from standard hourly rate	37.32%	37.32%	37.63%
	Level 1 Support Connection	Level 2 Coordination of Support	Level 3 Specialist Support Coordination
Operational Overheads			
Cumulative cost/hour, before Operational Overheads	\$50.01	\$65.72	\$93.89
Operational Overheads (\$)	\$15.90	\$35.88	\$88.93
Cumulative cost/hour, after Operational Overheads	\$65.92	\$101.60	\$182.82
Cumulative increase from standard hourly rate	80.99%	112.29%	167.99%

	Level 1 Support Connection	Level 2 Coordination of Support	Level 3 Specialist Support Coordination
Corporate Overheads			
Cumulative cost/hour, before Corporate Overheads	\$65.92	\$101.60	\$182.82
Corporate Overheads (%)	14.00%	14.00%	14.00%
Corporate Overheads (\$)	\$9.23	\$14.22	\$25.60
Cumulative cost/hour, after Corporate Overheads	\$75.15	\$115.83	\$208.42
Cumulative increase from standard hourly rate	106.33%	142.01%	205.51%

	Level 1 Support Connection	Level 2 Coordination of Support	Level 3 Specialist Support Coordination
Margin			
Cumulative cost/ hour, before Margin	\$75.15	\$115.83	\$208.42
Margin (%)	2.00%	2.00%	2.00%
Margin (\$)	\$1.50	\$2.32	\$4.17
Cumulative cost/hour, after Margin	\$76.65	\$118.14	\$212.59
Cumulative increase from standard hourly rate	110.46%	146.85%	211.62%

	Level 1 Support Connection	Level 2 Coordination of Support	Level 3 Specialist Support Coordination
Final Hourly Price Limit	\$76.65	\$118.14	\$212.59

SUPPORT COORDINATION UNFUNDED WORK

DIA has explored a number of areas of unfunded work, where Support Coordinators currently gap fill inefficiencies in the NDIS including:

- LAC under performance, capacity shortages and capability deficiencies.
- Planners inadequate communication of decisions and error in planning (such as supporting a participant to understand what rights they may be able to exercise).
- NDIA inadequate communication about scheme design and principles.
- Mainstream interface gaps where people with a disability fall between multiple services systems.
- Costs associate with supporting the conclusion of supports and services after a NDIS participant has passed away.

Many of these areas relate to the quantity of funding put into a participants plan, i.e. the number of hours and not specifically a price limit or pricing arrangements, save for the cost associated with the passing of a NDIS Participant.

BEREAVEMENT COST FOR SUPPORT COORDINATORS

DIA recommends that Support Coordinators be able to claim for reasonable costs and work undertaken by Support Coordinators after a participant's passing. Last year the NDIA created a Bereavement Policy however did not investigate or consider Support Coordinators applicability to this new pricing arrangement.

DIA asked our members how much time on average they spent delivering work in an unfunded capacity after a participant's death.

Number of hours of unfunded work for Support Coordination Levels 1, 2 and 3 where a participant has passed away.

Total Corporate Overheads per hour (\$)	Mean	10PC	25PC	50PC	75PC	90PC
Level 1: Support Connection	10	5	9	10	11	12
Level 2: Coordination of Support	10	6	9	10	13	18
Level 3: Specialist Support Coordination	10	8	9	10	15	22

DIA' recommends that Support Coordinators should be able claim up to 10 hours in the 30 days after a participant's death where they are required to undertake Coordination activities (e.g. Coordinating the ceasing of services with providers, ensuring providers promptly make claims for services delivered before the participants passing).

PLAN MANAGEMENT BENCHMARKING RESPONDENT PROFILE

At the time of closing responses to DIA's benchmarking program, DIA had received 511 individual responses from Plan Management providers. In terms of the survey's representation of the broader Plan Management market, of the 454 responses received 89% identified as 'For Profit' and 11% as 'Not for Profit'.

Plan Management Survey Responses by Organisational Structure

Structure	Number of Responses	Percentage of Responses
For Profit	392	77%
Not for Profit	179	35%
Not Stated	3	0.5%

The respondent's coverage of the States and Territories revealed a relatively even distribution which highlights the national nature of a large proportion of the Plan Management market

Plan Management Survey Responses by Jurisdiction of Participants Serviced

Responses greater than the 511 responses received as respondents service multiple jurisdictions. Percentage sum greater than 100% due to multiple jurisdiction coverage of respondents.

Jurisdiction of Service	Number of Responses	Percentage of Responses
ACT	72	14%
NSW	92	18%
NT	56	11%
QLD	82	16%
SA	77	15%

TAS	61	12%
VIC	87	17%
WA	61	12%

The respondents were also asked the number of individual participant's that their organisation supports to identify the size of operations within the Plan Management market. The survey respondents classified as "Small" 17%, "Medium" 80% and "Large" 3% of the respondents.

Plan Management Responses by Number of Participants Supported

Size by Number of Participants	Number of Responses	Percentage of Responses
Small	87	17%
Medium	404	79%
Large	20	4%

FINANCIAL RESULTS – PLAN MANAGEMENT

The survey responses showed that 55% of respondents reported that they made a Loss / Deficit or a Break-Even financial result for the 2020-21 financial year.

Plan Management Responses by Financial Result

Financial Result '20-21	Number of Responses	Percentage of Responses
Profit / Surplus	229	45%
Loss / Deficit	198	38%
Break Even	89	17%
Not Provided	2	0%

Further analysis of the financial result data shows that organisations categorised as "Small", "Medium" and 'Large have a similar percentage of financial result as each other, which indicates the Plan Management Market

maturing and converging on similar levels of efficiency regardless of size and variation of operating model.

The organisational structure showed only minor differences in terms of financial results from the survey with the percentage of respondents reporting a Profit only significantly different for large providers.

Overall, the survey results showed that only 45% of the respondents returned a 'Profit / Surplus' for the 2022 Calendar Year with organisational structure playing only a minor factor in determining the financial outcome, with not-for-profit entities reporting marginal better financial performance of for-profit entities.

The survey results would indicate that there is a small benefit in being an organisation of a 'Large' size compared to those of a 'Small' or 'Medium' size in terms of the number of participants supported.

This is further supported by anecdotal evidence which has been presented for the last 2 years, in which Plan Management providers have indicated a small advantage in developing and scaling up operations within the current pricing structure.

BENCHMARKING RESULTS – PLAN MANAGEMENT

The Plan Management Survey consisted of series of areas of exploration. This year DIA requested a specific pay point to ensure greater consistency and specificity in responses. Any unreasonable responses that were outside a reasonable margin of error were followed up to confirm or be amended by the respondent.

General themes include:

- a. Removal of Set Up fee for plan Extensions.
- b. Increasing costs on compliance and reporting activities to both the NDIA and NDIS Commission.
- c. Debt Liability Issues.
- d. Debt Recovery Issues.
- e. Increasing costs for technology development and response.
- f. Inadequate plan management fee rates.

EMPLOYMENT CONDITIONS – PLAN MANAGEMENT

The common reference point in the disability sector for base pay conditions is the Social, Community, Home Care and Disability Services (SCHADS) Award which the NDIA use as a base for the Disability Support Worker Cost (DSW) model across four different levels.

The Plan Management sector continues to migrate to the SCHADS Award for Plan Management employees.

Percentage of Respondents by Award / Agreement – Workers (Participant Facing)

Award / Agreement	% of Respondents	% Shift in the past 18 months
SCHADS	51%	▲ 18%
Clerks	21%	▼ 10%
Other	25%	▼ 5%
Banking Finance and Insurance	3%	▼ 3%

This trend towards the SCHADS award is also evident for Supervisory staff with over a 49% of respondents indicating that supervisory staff are employed under the SCHADS Award.

Percentage of Respondents by Award / Agreement – Supervisors

Award / Agreement	% of Respondents	% Shift in the past 18 months
SCHADS	49%	▲ 14%
Clerks	16%	▼ 7%
Other	37%	▼ 5%
Banking Finance and Insurance	4%	▼ 2%

BASE RATE OF PAY – PLAN MANAGEMENT

The DIA benchmarking survey asked respondents to indicate base levels of pay for average Plan Management workers and for ‘Supervisory’ workers. This approach also captures blended rates for teams approach service models.

This year DIA requested a specific pay point to ensure greater consistency and specificity in responses. Any unreasonable responses that were outside a reasonable margin of error were followed up to confirm or be amended by the respondent.

Base rate of pay for Plan Managers

	Mean	10PC	25PC	50PC	75PC	90PC
Plan Management - Worker	\$36.22	\$36.18	\$36.20	\$36.22	\$36.60	\$36.91
Plan Management - Supervisor	\$47.80	\$47.72	\$47.80	\$47.82	\$48.00	\$48.22

Not unsurprisingly, this revised approach in our Benchmarking has resulting in very similar pricing to Level 1 Support Coordination.

DIRECT ON-COSTS – PLAN MANAGEMENT

The DIA benchmarking survey asked respondents about the costs of employment associated with Superannuation entitlements, Annual Leave entitlements, Personal Leave entitlements, Long Service Leave entitlements and Employee Allowances.

This year DIA requested a specific amounts, dollars, hours and percentages to ensure greater consistency and specificity in responses. Any unreasonable responses that were outside a reasonable margin of error were followed up to confirm or be amended by the respondent.

Direct On-Costs for Plan Management

	Mean	10PC	25PC	50PC	75PC	90PC
<u>Annual Leave</u>						
- Hours accrued in a year	152	152	152	152	152	152
- Loading	17.5%	0%	17.5%	17.5%	17.5%	17.5%
<u>Personal Leave</u>						
- Hours accrued in a year	76	76	76	76	76	76

<u>Public Holidays</u>						
- Hours of public holidays	106	91	106	106	114	121
<u>Superannuation</u>						
- 2022-23 Rate	10.5%	10.5%	10.5%	10.5%	10.5%	10.5%
- 2023-24 Rate	11%	11%	11%	11%	11%	11%
<u>Employee Allowances</u>						
- Allowance Rate	1%	0%	1%	1%	1.5%	2%

OPERATIONAL OVERHEADS – PLAN MANAGEMENT

The DIA benchmarking survey asked respondents about Operational Overheads including those costs which are in the operational control of the provider such as workers compensation costs, utilisation costs, supervision costs and workforce rostering and balance measures such as the share of the workforce that is permanent or casual, the extent to which overtime is used by the business, and blending to a flat fee rate factoring afternoon, weekend and public holiday rates etc.

It is important to note that Plan Management providers have significantly fewer operational overheads, however significantly higher corporate overheads. This is not unsurprising given the technology demands of processing payment claims with integrity and security.

This year DIA requested a specific amounts, dollars, hours and percentages to ensure greater consistency and specificity in responses. Any unreasonable responses that were outside a reasonable margin of error were followed up to confirm or be amended by the respondent.

Operational Overheads for Plan Management

Total Operational Overheads per hour (\$)	Mean	10PC	25PC	50PC	75PC	90PC
Plan Management	\$10.77	\$10.46	\$10.77	\$10.77	\$10.93	\$11.27

CORPORATE OVERHEADS – PLAN MANAGEMENT

The DIA benchmarking survey asked respondents about Corporate Overheads including the costs incurred to run the administrative side of their business.

These costs include the accounting, human resources, legal, marketing, compliance and technology functions.

It is important to note that Plan Management providers have significantly fewer operational overheads, however significantly higher corporate overheads. This is not unsurprising given the technology demands of processing payment claims with integrity and security.

The NDIA in its Disability Support Worker Cost Model assumes that Corporate Overheads are 12.0% of direct costs. Our benchmarking program demonstrates that actual corporate overheads should, at a minimum, be considered at 25.30% of direct costs. This is due to several factors including increased inflationary pressures driving higher costs of accounting, human resources, legal, marketing, compliance and technology functions.

This year DIA requested a specific amounts, dollars, hours and percentages to ensure greater consistency and specificity in responses. Any unreasonable responses that were outside a reasonable margin of error were followed up to confirm or be amended by the respondent.

Corporate Overheads for Plan Management

Total Corporate Overheads per hour (\$)	Mean	10PC	25PC	50PC	75PC	90PC
Plan Management	\$15.31	\$15.01	\$15.31	\$15.31	\$15.58	\$15.71

PLAN MANAGEMENT COST MODEL

DIA propose the use of the below cost model.

Cost Model for Plan Management

	Plan Management
Standard Hourly Rate	\$36.22

	Plan Management
Direct On Costs	
<u>Annual leave</u>	
a. No. hours leave accrued in a year (hrs/yr.)	152
b. Loading	17.50%
c. Proportion of leave taken	100%
Cost per worked hour	\$3.87
<u>Personal leave</u>	
a. No. hours leave in a year (hrs/yr.)	76
b. Loading	0%
c. Proportion of leave taken	100%
Cost per worked hour	\$1.65
<u>Public Holiday leave</u>	
a. No. hours leave accrued in a year (hrs/yr.)	106
b. Loading	0%
c. Proportion of leave taken	100%
Cost per worked hour	\$2.30
<u>Long Service leave</u>	
a. No. hours leave accrued in a year (hrs/yr.)	32.93
b. Loading	0%
c. Proportion of leave taken	100%
Cost per worked hour	\$0.71
<u>Superannuation</u>	
Superannuation Rate (%)	11.00%
Superannuation per worked hour	\$4.63
<u>Employee Allowances</u>	
Allowance Rate (%)	1%
Allowance Cost per worked hour	\$0.36
Cumulative cost/hour, after Direct On-costs	\$49.74
Cumulative increase from standard hourly rate	37.32%

	Plan Management
Operational Overheads	
Cumulative cost/hour, before Operational Overheads	\$49.74
Operational Overheads (\$)	\$10.77
Cumulative cost/hour, after Operational Overheads	\$60.51
Cumulative increase from standard hourly rate	67.06%

	Plan Management
Corporate Overheads	
Cumulative cost/hour, before Corporate Overheads	\$60.51
Corporate Overheads (%)	25.30%
Corporate Overheads (\$)	\$15.31
Cumulative cost/hour, after Corporate Overheads	\$75.82
Cumulative increase from standard hourly rate	109.32%

	Plan Management
Margin	
Cumulative cost/ hour, before Margin	\$75.82
Margin (%)	2.00%
Margin (\$)	\$1.52
Cumulative cost/hour, after Margin	\$77.33
Cumulative increase from standard hourly rate	113.51%

	Plan Management
Average Hours of Service per month	1.48

	Plan Management
Final Monthly Price Limit all-inclusive including set up.	\$135

TECHNOLOGY TRANSITION COSTS

PACE

The NDIA's forced pilot on the new PACE business system in Tasmania continues to lead to significant costs and inefficiencies being forced upon the Plan Managers and Support Coordinators.

These costs were not considered in this year's Annual Price Review. DIA is supportive of the NDIA's desire to deliver a new fit for purpose business system. However, what is being piloted / rolled out in Tasmania at present is far from fit for purpose.

DIA has been informed by numerous Plan Management and Support Coordination providers who have had to withdraw from offering support in Tasmania due to the inefficiencies and costs associated with the PACE system.

DIA has called on the NDIA to halt further rollout of the pace system once 1000 NDIS participants have Plans in pace. This will provide the NDIA with sufficient mass to undertake testing and deliver system improvements.

As at the time of this submission there remains countless structural and significant issues with the PACE system that must be resolved and made fit for purpose before the system can be further rolled out.

DIA asked a series of questions in this year's benchmarking program to providers who were operating in Tasmania.

In contrast between the current Business System and PACE what percentage change in time does it take to undertake these basic functions.

	Mean	10PC	25PC	50PC	75PC	90PC
Onboard New Participant	Increase 46%	Increase 30%	Increase 40%	Increase 46%	Increase 50%	Increase 70%
Information Look Up	Increase 24%	Decrease 4%	Increase 12%	Increase 22%	Increase 28%	Increase 39%
Request for Service	Increase 15%	Decrease 4%	Increase 6%	Increase 12%	Increase 18%	Increase 30%
Claiming	Increase 2%	No Change	No Change	Increase 2%	Increase 4%	Increase 12%
Release of Funds (payment)	Increase 200%	Increase 100%	Increase 185%	Increase 200%	Increase 230%	Increase 300%

DIA acknowledge that the release of funds results is likely skewed by early (December through January) payment challengers. DIA acknowledges that some of the elements that caused the delays in release of funds from the NDIA have been resolved. Members are still reporting delays in payments being released by the NDIA.

How much time have as your business spent on re-training staff to work in PACE.

	Mean	10PC	25PC	50PC	75PC	90PC
Plan Management	15 Hours	10 Hours	12 Hours	15 Hours	18 Hours	28 Hours
Support Coordination	12 Hours	8 Hours	10 Hours	12 Hours	17 Hours	24 Hours

This training cost is significant, just utilising the wage cost alone this represents an average of:

1. \$746.10 per worker for Plan Managers
2. \$788.64 per worker for Support Coordinators

Note that DIA has not factored lost or reduced productivity, just strictly wag costs.

DIA acknowledged that these re-training costs are contained specifically to the rollout of PACE, i.e. transitional cost, once fully rolled out new workers will have such training rolled into their onboarding / induction process.

Plan Managers and Support Coordinators are required to operate a sustained high level of efficiency in order to be viable. However, at this moment in time the PACE system is not capable of achieving the required levels of efficiency within the existing price limits.

CYBER SECURITY

The NDIA has significantly increased its technical and procedural requirements to access digital channels such as API's. Recently requiring providers to undergo ISO 27001 certification.

To achieve this, providers are required to undertake 2 stages of Audits. Certification. During DIA's benchmarking program we asked Plan Managers and Support Coordinators who had undertaken such certification what their cost were:

How much have you spent on audit costs associated with ISO 27001 Certification?

	Mean	10PC	25PC	50PC	75PC	90PC
Stage 1 and Stage 2 Audits	\$15,000	\$7,500	\$11,000	\$15,000	\$30,000	\$50,000
Surveillance Audits	\$7,500	\$6,000	\$7,000	\$8,000	\$15,000	\$26,000

Audits cost between \$15000 and \$50000, depending on the certified auditor. Beyond this, periodic surveillance audits which are required cost between \$7,500 and \$25000. Typically, surveillance audits cost about half the initial two stage audit costs.

Beyond this, then NDIA have indicated that they will be asking even more from Providers to further bolster scheme cyber security. There are no specific details on what these measures will be, however it is clear in the language provided by the NDIA that these will not be insignificant.

Whilst DIA is not only supportive but champions robust measures to bolster scheme wide cyber security these costs have not been factored into the pricing agreements set by the NDIA.

"I'm stunned the data presented in the NDIS Commission Own Motion Enquiry can't be right.

We are a small Support Coordination Practice and we have reported and made more complaints than all of those listed in the stage one report".

Alice
Support Coordination Provider
Victoria



NDIS COMMISSION OWN MOTION INQUIRY

The NDIS Commission on the 22 August 2023, announced and released Part 1 of the NDIS COMMISSION OWN MOTION INQUIRY into Support Coordination and Plan Management.

This inquiry has been conducted in a very different way to the two other own motion inquiries that have been undertaken. In that today's announcement and release of Part 1 has been conducted without any to notice or consultation with participants, sector and key stakeholders.

Unlike other NDIS Commission own motion inquiries release of this initial Part 1 that only explores the NDIS Commission complaints data at a high level and only 48 pages in length which includes;

- Quality and safeguarding concerns being raised in relation to support coordination and plan management; and

- Positive contributions good support coordination and plan management are making to quality and safeguarding in the NDIS.

DIA understands that the NDIS Commission will undertake further work and deliver Part 2 of this own motion inquiry after the NDIS Review and Royal Commission has concluded their work.

Part 2 of the Inquiry will examine whether the NDIS Commission should make any changes to how it regulates support coordination and plan management to:

- Address any quality and safeguarding concerns identified in Part 1 of the Inquiry; and
- Support the positive contributions made by good support coordination and plan management identified in Part 1 of the Inquiry.

Our initial analysis of the data contained with this first stage is not to in anyway diminish or downplay the realities of the any individual complaint, rather is to provide context about with this data means to the sector and NDIS Participants.

INTERMEDIARIES HAVE AN IMPORTANT ROLE IN SAFEGUARDING

Part 1 states:

“Support coordinators and plan managers should play an important role in helping participants to make good use of their NDIS plans so as to work towards achieving their goals.

A good support coordinator should help a participant with more complex needs to engage and manage the right NDIS supports and to connect to other mainstream and community supports, while a good plan manager should help a participant to manage their NDIS funds and pay their NDIS providers.

Support coordinators and plan managers can make a significant contribution to good outcomes for the participant. Some support coordinators and plan managers provide good quality supports, respecting the rights of participants, providing supports with care and skill and acting with integrity.”

CONFLICT OF INTEREST

Pleasingly the NDIS Commission has recognised the issue around conflict of interest, something that DIA has been championing for some time. On Page 11 of Part one the NDIS Commission looks at this issue in the context of SRS (Supported Residential Services) in Victoria.

“Participants’ experiences in SRS and the NDIS Commission’s actions in responding to complaints and incidents brought into sharp focus:

- The risks of having support coordination and plan management supports provided by the same entity that provides other NDIS and non-NDIS supports to the participant, or a person or entity closely associated with them; and
- The benefits of having support coordination and plan management provided independently of a participant’s other NDIS and non-NDIS supports so that the support coordinator and manager can support participants to identify any shortcomings in their other supports, to raise concerns

and to consider whether their other providers are delivering the supports they need to achieve their goals.”

This is something that DIA sees on a regular basis and has continued to call on government to take a stronger and nuanced stance, like DIA has in our Professional Standards of Practice, on conflict of interest and independence of service.

PLAN MANAGEMENT COMPLAINTS DATA

The NDIS Commission has focused primarily on the ‘Top 10’ Largest Providers, 9 of whom are DIA Members.

The NDIS Commission received 384 complaints around Plan Management from 1 July 2018 to 9 May 2023 of almost 5 years.

The 10 largest Plan Managers serviced over 157,200 NDIS Participants over the same period.

The 384 complaints over almost 5 years represents less than 0.24% of

NDIS Participants serviced by the Top 10 Plan Managers.

DIA is pleased to see the NDIS Commission recognise the positive roles that Plan Managers have in supporting NDIS Quality and Safeguarding.

Many of the complaints appear to be about issues where this is significant policy gaps around the roll of a Plan Manager, particularly around whether a support can be claimed for under the NDIS.

It is not lost on DIA that in one instance a NDIS Participant complained that a Plan Manager would not pay for a support without the approval of the NDIA (likely as it was not in line with their plan).

However, then opposite is also complained about with Local Area Coordinators raised concerns that plan managers were paying for items that were clearly not within the relevant participant’s plan and were not reasonable and necessary supports.

So, which is it – does the NDIS Participant have the choice and

control to direct a Plan Manager to claim for everything and anything they request or is a Plan Manager a gate keeper that has to determine if a support is in line with a NDIS Participants Plan and reasonable and necessary. Talk about a rock and a hard place.

There are many other examples of policy gaps that are causing our sector significant issues. Themes including:

- ❑ Conflicts of interest
- ❑ Denying participants' choice and control
- ❑ Coercion and sharp practices
- ❑ Crossing professional boundaries.

SUPPORT COORDINATION COMPLAINTS DATA

The NDIS Commission has reviewed a total of 460 Complaints from 1 Jan 2022.

Over the same period of time Support Coordinators delivered services to 282,640 NDIS Participants.

The 460 complaints over the year represents less than 0.16% of NDIS Participants serviced by Support Coordinators.

DIA was pleased to see the NDIS Commission recognise the positive roles that Support Coordination has in supporting NDIS Quality and Safeguarding.

DIA is disappointed that the Volume of NDIS Participant Funding for Support Coordination was not explored.

The Own Motion Inquiry assumes that all Support Coordination functions are delivered by a Support Coordinator every time Support Coordination is funded in a Participants Plan, this not the case, the NDIA determines the volume of funding a Participant will receive for Support Coordination and this intern limits / dictates what support a Participant will engage a Support Coordinator for.

The NDIS Commission has broken down the complains into two key areas a) Integrity Concerns and b) Care and Skill Concerns. As will Plan Management above DIA notes that

much of the areas raised speak to existing policy gaps within the NDIS. Themes include:

- ☐ Inadequate supports being provided;
- ☐ Poor communication;
- ☐ Errors in relation to NDIS requirements;
- ☐ Overcharging;
- ☐ Inadequate or inappropriate responses to concerns being raised;
- ☐ Depletion of the participant's NDIS funds;
- ☐ Cessation of support coordination supports;
- ☐ Other matters including breaches of privacy, verbal abuse and exclusion of informal or other supports.

being report are extremely low considering the scale of NDIS participants utilising Plan Management (376,855 NDIS Participants) and Support Coordination (282,641 NDIS Participant).

To put these percentages into some level of perspective, adjacent sectors experience (Health and Finance etc) significantly higher levels of complaints at between 2.0 to 5.0%.

There is always room for further work to be undertaken to lift the quality of service within Plan Management and Support Coordination.

DIA is at the forefront of this work and will continue to drive the sector to deliver a high-quality professional service to NDIS Participants.

WHAT DOES THIS DATA TELL US

Anyone who is involved with any type of complaints mechanism will tell you that there are always more unreported complaints as those reported, however the numbers

DIA notes that 10 years on from the launch of the scheme there is still currently no or very limited day to day operational Policy Framework for Plan Management and Support Coordination under the NDIS, outside of DIA's Professional Standards of Practice.

After 10 years the NDIA has only published a simple 'Guide to Plan Management' and a paper on 'Improving Support Coordination' which has had little impact on the way the sector operates given that it basically defined what the sector was already doing.

So, to only have the scale of complaints that currently exists is a credit to the amazing work the most Plan Management and Support Coordination Providers and Practitioners delivery on a daily basis.

WHAT THE OWN MOTION INQUIRY DOESN'T SAY

DIA was disappointed that information about the NDIS Commissions responses to the complaints, even at an aggregated level, was not supplied or analysed. The NDIS Commission has a range of responses to complaints ranging from No Action all the way up to strict Compliance and Enforcement measures (such as fines, revocation of registration and banning orders).

Part 1 of this own motion inquiry sates in both the Plan Management and Support Coordination sections

that "participants and other interested parties are raising a range of serious integrity and quality concerns".

Given this, what are the outcomes or responses the NDIS Commission has taken to address these serious integrity and quality concerns?

The response to complaints provides a clear view of the scale and impact of complaints – i.e. extremely serious complaints should be met with the strongest response, in contrast complaints with no / little merit should be closed with no action.

DIA is disappointed to see complaint examples within the report without any comment or viewpoint of the provider or comments as to the action/response taken by the NDIS Commission.

Without the inclusion of this information the reader can wrongly assume that each of these complaints resulted in compliance responses, which may simply not be the case.

DIA is disappointed that the price freeze for both Plan Management and Support Coordination for now 4 years, was not explored as part of this Own Motion Inquiry.

Current NDIA price limits do not include any funding specifically in recognition of the quality and safeguarding expectations being put onto Plan Managers and Support Coordination.

Such funding has been clearly called out for other disability supports that fall under the NDIA's Disability Support Worker Cost Model, but not for Plan Management or Support Coordination.

DIA has been warning the NDIS since 2020 that the quality of intermediary supports across the sector would be negatively impacted given the price freeze (which is a price cut in real terms).

It is therefore no surprise that the NDIS Commission has experienced an increase in complaints about Plan Management and Support Coordination since 2020.

INITIAL CONCLUSION ON THE NDIS COMMISSION'S OWN MOTION INQUIRY

The data around complaints is welcomed and will underpin further work to drive sector quality by DIA.

There are both positives and areas the sector needs to work on.

DIA is disappointed that:

- This work has been done in secret, without consultation or opportunity to provide input (as seen with the other Own Motion Inquiry).
- The lack of analysis on the response measures for the complaints and notifiable incidents, particularly given some of the complaints date back to 2018.
- Allegations against Plan Managers and Support Coordination Providers were summarised without context and in most cases with no outcome or response. So, what happened to these complaints?

DIA was pleased to see that Plan Management and Support Coordination conflict of interest continues to be highlighted as a significant policy gap.

DIA's own Professional Standards of Practice are leading the way and well ahead of the requirements of the NDIA or NDIS Commission.

DIA was pleased to see a recognition that Plan Managers and Support Coordinators are marking report to the NDIS Commission about issues they are seeing.

However, DIA notes that our Plan Management and Support Coordination members often receive very little feedback or response to these complaints which actively discourages them from continuing these.

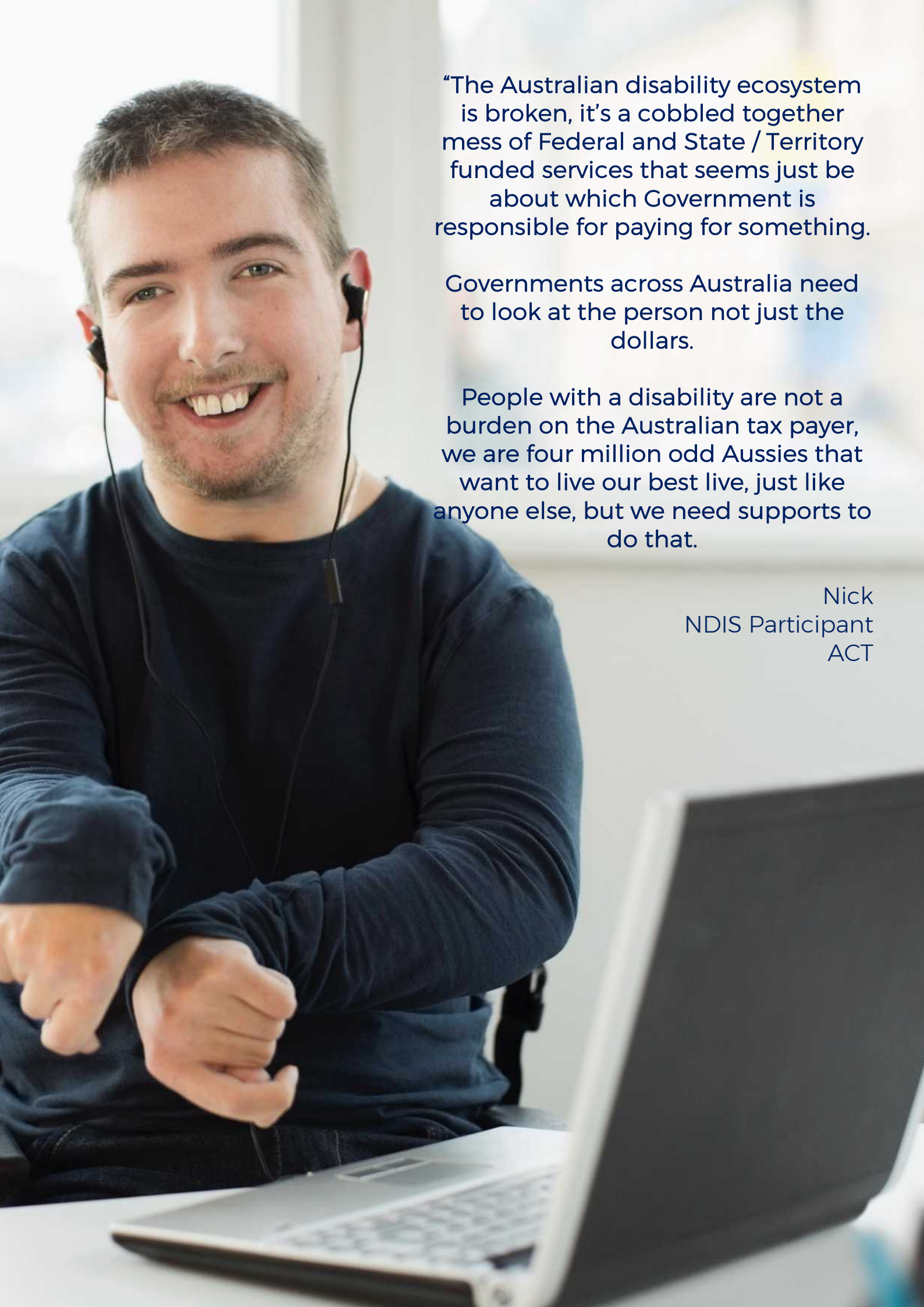
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DIA will engage heavily in Part 2 of this Inquiry, which will commence following the outcomes of the NDIS Review and Royal Commission.



“The Australian disability ecosystem is broken, it’s a cobbled together mess of Federal and State / Territory funded services that seems just be about which Government is responsible for paying for something.

Governments across Australia need to look at the person not just the dollars.

People with a disability are not a burden on the Australian tax payer, we are four million odd Aussies that want to live our best live, just like anyone else, but we need supports to do that.

Nick
NDIS Participant
ACT

THE FUTURE

Intermediaries play a critical role in several service sectors in Australia from retail financial services, wealth management, private health, telecommunications and utilities to name a just few.

They help Australians navigate complex purchase decisions where the products and services are often based on complicated rules, regulation, compliance or pricing constructs that make them difficult to understand and compare.

Similarly, key government services deploy intermediary support systems in the areas of taxation, immigration, higher education and town planning to help the public navigate rules and requirements.

Intermediaries provide advice, assist with the preparation of mandated documentation and provide a key role in supporting regulatory authorities to achieve compliance.

These same comparable services apply in the context of the NDIS. However, unique to the NDIS,

intermediaries also provide an operational engine room and financial rails that underpin the Scheme, facilitating the claims and remittances associated with more than \$16bn in payments to over 166,000 providers on behalf of over 366,000 participants in FY23.

The disability intermediary sector:

- Facilitates maximum choice and control enabling participants' use of more than 166,000 providers nationally – more than 8.5 times the 18,000 NDIS-registered providers.
- Delivers person-centred, mainstream-like customer experiences where intermediary providers have introduced global best practice with accessible digital platforms for planning and budget management, partnered with quality customer contact channels facilitated by service professionals with both a lived experience with disability and mainstream experiential service industry experience.
- Benchmarked service innovation leadership via encouraging significant investment in advanced technology platforms to drive efficiency. The result is the evolution of a unique and

enhanced service proposition: system navigation. Well beyond book-keeping, system navigation delivers an optimised experience of the NDIS for participants as it compliments and proactively supports the NDIA, Local Area Coordinators and traditional service delivery agencies.

- Supports system sustainability by ensuring that:
 - Participants are supported to navigate and access the complex system of NDIS, Mainstream and Community supports.
 - All providers to plan managed participants charge within the NDIS approved Schedule of Fees for the services they deliver.
 - Participants understand their obligations and responsibilities to be compliant with scheme rules as they exercise choice.
 - The Agency is supported in identifying individuals and operators who may be committing fraudulent activities.
- Attracted private investment capital taking the pressure off government to underwrite much of the technical investment required to enable the core participant servicing and system navigation capabilities associated with customer interfaces or universal provider claims and payment systems. The result is that the bulk of the administrative cost to support 60% of Scheme participants via plan management is less than 3% of spent plan funding.
- Participants consistently remind us; they use Plan Managers and Support Coordinators because intermediaries:
 - (a) Help them understand how the scheme can work for them;
 - (b) Help them feel empowered and confident as they negotiate a bureaucracy that often challenges the validity of their support needs and life goals; and
 - (c) Take care of the admin so they can get on with living their best life.

The forward model of scheme, service and financial intermediaries needs to be simplified and structured in a way that allows for the choice and control and with a focus on participant outcomes.

DIA recommends the NDIS review consider a model that sets key principles at the forefront of intermediary service delivery including.

PRINCIPLE ONE SELF-DIRECTION

Intermediaries must focus on the strengths of the participant and promote self-direction and greater autonomy in collaboration with informal supports and/or formal decision makers as appropriate.

Intermediaries are engaged by act at the direction of and in the best interests of the Participant.

PRINCIPLE TWO INDEPENDENCE

To the maximum extent possible Intermediaries must deliver an independent service approach (with limited exemptions where justified) to ensure the mitigation or risk of conflict-of-interest concerns and promote greater transparency as well as genuine choice and control for the participant.

Intermediaries must do the utmost to avoid conflicts of interest and, where they do arise, deal with them openly, fairly and promptly.

Intermediaries will assist participants to achieve their goals, without seeking to further the financial or other interests of third parties.

PRINCIPLE THREE CONSUMER APPROACH

Intermediaries must conduct business in an honest, fair, transparent, and professional manner.

Participants that engage an Intermediary must receive specialised support to move from a passive recipient with fewer choices of services to active consumers that shapes the market through their informed choice and spending power.

Intermediaries must ensure that all their advertising and marketing material is reasonable, decent, realistic and truthful.

PRINCIPLE FOUR BUILD CAPACITY

Intermediaries must work with participants and/or legal decision makers to maintain and build their capacity over time.

Intermediaries must work in a safe and competent manner within their individual scope and function:

- Support Coordinators must work to ensure participants understand and navigate the NDIS, implement and gain increased value from their plan, connect with other broader systems of support, and strengthen informal supports.

This includes maintaining existing capacity and where possible building capacity to undertake Coordination tasks, make informed decisions relating to the choice, delivery and management of providers and the supports they need to enjoy a good life.

- Plan Managers must look for opportunities in everyday interactions to build capacity with the participants they support.

This includes working in a collaborative manner with participants to manage their plan budget to achieve their goals and outcomes.

PRINCIPLE FIVE BEST INTEREST

Intermediaries must assist participants to exercise their choice and control in the supports the participant engage to meet their needs and achieve their goals.

Intermediaries must work with due skill, care and diligence, and ensure that any staff employed or engaged will service have the necessary skills to carry out their tasks.

Intermediaries must understand and utilise current strengths and evidence-based practices that apply to the specific needs of the participants they support and reflect and promote these practices within the participant's support team.

PRINCIPLE SIX DIGNITY

Intermediaries must not discriminate unfairly in any dealings with participants, respecting the privacy and dignity of participants, whilst understanding that participants always have some capacity in their choices.

While acknowledging and respecting the role of families, carers, advocates and other significant persons, Intermediaries must recognise each participant's right to make their own decisions where they can.

Intermediaries must support the participant's autonomy and self-determination to make their own choices, including the choice to take some risks in life as per the principle of "Dignity of Risk".

Intermediaries must be not required to or responsible for making decisions on a participant's behalf, rather Intermediaries may assist participants to make informed decisions.

PRINCIPLE SEVEN ACCOUNTABILITY

Intermediaries must ensure that participants they service are provided with terms of engagement that are fair and clear.

These must meet all legal requirements and relevant codes of practice including reference to complaints-handling procedures and, where it exists, an appropriate redress scheme.

In all dealings with participants, Intermediaries must ensure that all communications (both financial and non-financial subject matters) are fair, clear, timely and transparent.

Intermediaries must be covered by adequate insurance.

Support Coordinators are expected to develop and maintain the knowledge, skills, and practices required to support the participants they service.

Plan Managers must ensure that all participant monies are transacted separately from other monies in

appropriately designated trust account arrangements.

PRINCIPLE EIGHT VALUES AND BELIEFS

Intermediaries must assist the participant to access supports that respect their culture, diversity, values and beliefs.

Intermediaries must promote, uphold and respect all participants' legal and human rights and enable them to exercise informed choice and control.

Intermediaries must promote, uphold and respect each individual's right to freedom of expression, self-determination and decision-making.

PRINCIPLE NINE CONTINUOUS IMPROVEMENT

Intermediaries must implement evidence-based practice informed through NDIS practices standards, recommended industry standards and their own professional development and learning.

Intermediaries will take an active role in encouraging and supporting participants, or their advocates, to make complaints or provide feedback in the interests of continuous improvement.

PRINCIPLE TEN POSITION OF POWER

Intermediaries must recognise that some participants are not in a position or capable of exercising some or all of their rights under law.

As such Intermediaries must recognise that they and providers of supports and services hold a position of power and must adequately support a participant to balance this power and support their interests.

PRINCIPLE ELEVEN SAFEGUARDING

Intermediaries must ensure they hold a zero tolerance to abuse, neglect, and fraud.

Intermediaries must report and cooperate with any lawful investigation into such matters immediately and fully.

Intermediaries must support participants to reduce their vulnerability through regular interactions to ensure they are well supported and receiving the services they have established.

FUTURE INTERMEDIARY ROLES AND FUNCTION

The roles and functions of each intermediary must be more clearly defined to ensure a seamless, efficient, viable and high-quality service model that delivers on the intents of the NDIS and builds Participants directed outcomes.

Participants must be able to 'vote with their feet' as an active consumer and be able to cease services from an underperforming intermediary. This is currently not the case with the LAC Model.

DIA proposes:

- A simpler participant centred Service Intermediary model that does away with 5 layers of coordination, navigation and implementation support (LAC, Level 1 Support Coordination, Psychosocial Recovery Coaching, Level 2 Support Coordination, Level 3: Specialist Support Coordination) replacing it with just three.
- Retaining the NDIS Funds Management service (Financial Intermediary) as a separate function to that of the service intermediary.
- Refocusing of Psychosocial Recover Coaching as a specialised highly skilled case management function to deliver best practice recovery approaches and practice

rather than also delivering low level Support Coordination mixed with coaching.

This would see the current intermediaries navigational and coordination model move from



to a more simple and easier to understand:



PROPOSED NDIS NAVIGATION, COORDINATION AND CASE MANAGEMNT MODEL

The below tables illustrate how these this simplified model could be implemented to deliver the best outcomes for NDIS Participants, whilst support scheme outcomes and sustainability.

The Below structure is established and supported by evidence-based navigation, coordination and case management approaches which is a **strengths-based model**.

This recognises the value of family, peer, community and mainstream supports to collectively deliver outcomes whilst also empowering participants and their families to create opportunities to build their capacity and self-determination.

This strengths-based support model encourages the participant to build and establish informal support networks alongside identifying and accessing formal community and mainstream supports.

This model delivers the supports needed for the Participant to take the lead in identifying their own needs, take control over the supports and services they choose to engage.

This model includes outreach, navigation and robust coordination and requires that the NDIS works collaboratively with the provider to ensure highly individualised services are delivered as well as capturing critical and complex data and information on support arrangements to inform future supports and funding.

	NDIS NAVIGATOR	NDIS COORDINATOR	NDIS CASE MANAGER
Participants			
Participants currently supported by	Local Area Coordination (LAC) (Plan Implementation Functions) Level 1 Support Connection	Level 2 Coordination of Supports	Level 3 Specialist Support Coordination Psychosocial Recovery Coaches
Eligible Participants	All Approximately 50% of All Participants (save for those supported with funding provided for Coordination and Case Management)	Reasonable and Necessary Decision Approximately 40% of All Participants	Reasonable and Necessary Decision Approximately 10% of All Participants
Support Package	15 Hours	Minimum of 30 hours Reasonable and Necessary Decision	Reasonable and Necessary Decision
Support Rate	\$76.65	\$118.14	\$212.95
Scheme Saving	\$61M Yearly Saving	\$10M Yearly Saving	\$11M Additional Cost Due to current under investment
Providers			
Should Providers need to be accredited	Yes* *requires changes to price regulation / limits to implement.	Yes* *requires changes to price regulation / limits to implement	Yes* *requires changes to price regulation / limits to implement
Delivered by	Open Market (i.e. Participant can choose from a market of Providers)	Open Market (i.e. Participant can choose from a market of Providers)	Controlled Market (i.e. Participant can choose from a market of Providers that are required to meet higher compliance standards)

	NDIS NAVIGATOR	NDIS COORDINATOR	NDIS CASE MANAGER
Current Providers Likely to Deliver this support.	LACs Level 1 Support Connection Plan Managers (not a part of their funds management functions)	Level 2 Coordination of Supports	Level 3 Specialist Support Coordination Psychosocial Recovery Coaches
Providers delivering intermediary supports must be prohibited from delivering other supports to the same Participant (save for appropriate exemptions).	Yes	Yes	Yes

Workforce			
Should Worker Accreditation Be Required	Yes	Yes	Yes
Worker Specialisation	Base	Moderate	High

Support Functions			
Support Participant to understand their plan and how they can use it.	✓	✓	✓
Support Participants to find and connect with supports and services.	✓	✓	✓
Connect with Community and Mainstream Supports.	✓ □	✓ □	✓ □
Support Participants to establish the supports and services.	✓	✓	✓
Monitor, Reflect and Refine Support	✓	✓	✓
Design Support Approaches		✓	✓

	NDIS NAVIGATOR	NDIS COORDINATOR	NDIS CASE MANAGER
Crisis Planning, Prevention, Mitigation and Action		✓	✓
Maintain and Build Capacity and Resilience		✓	✓
Cross System Navigation		✓	✓
Support Participant to engage Behaviour Support Practitioner and establish a behaviour support plan.		✓	✓
Cross System Negotiation Management			✓
Design Complex Support Plan			✓
Address Complex Barriers			✓
Psychosocial Recovery Practice			✓
Safeguarding			
Participant Check-In	✓ At least monthly Remote (Tele/Vida practice)	✓ At least Monthly Face to Face	✓ At least Fortnightly Face to Face or alternating with Tele/Vidi practice
As a trusted party representing the Participant interest above all other - Support Participants to make complaints to the NDIS Commission.	✓	✓	✓
As a trusted party representing the Participant interest above all other - Support Participants to report suspected fraud to the NDIA.	✓	✓	✓
Ensure that Participants are not receiving support from Banned Providers or Partitioners.	✓	✓	✓

	NDIS NAVIGATOR	NDIS COORDINATOR	NDIS CASE MANAGER
Report reportable incidents to the NDIS Commission, including unauthorised restrictive practices.	✓	✓	✓
Support a Participant to find alternative providers when existing provider is not meeting the needs or best fit with the Participant – Active consumer ‘voting with their feet’.	✓	✓	✓
Reporting to the NDIA			
Plan Implementation Report	✓	✓	✓
Change of Circumstances Report	✓	✓	✓
Participant Check-In Reports	✓	✓	✓
Progress Reports		✓	✓
Crisis Requiring Plan Change Report		✓	✓
Complex Barriers / Interfaces Report			✓
End of Plan and Outcomes Report	✓	✓	✓

PROPOSED NDIS FUNDS AGENT MODEL

The success and popularity of NDIS Plan Management is one of the NDIS's greatest innovations and achievements and demonstrates the need for plan spending advice and support that is independent of Government. In that same way a Tax Agent works within the Australian Tax system.

Currently Plan Management is the only NDIS that sets the requirement to be registered within the NDIS Act.

This funds management model recognises the value of family, peer,

community and mainstream supports to collectively deliver outcomes whilst also empowering participants and their families to create opportunities to build their capacity and self-determination.

This NDIS Funds management model creates the ability and facilitates NDIS Participant to exercise a dignity of risk to try new supports and services to meet their needs. It also takes significant pressure off the NDIS's business systems to work with the largest number and different types of providers within any Australian Government Program.

NDIS FUNDS AGENT

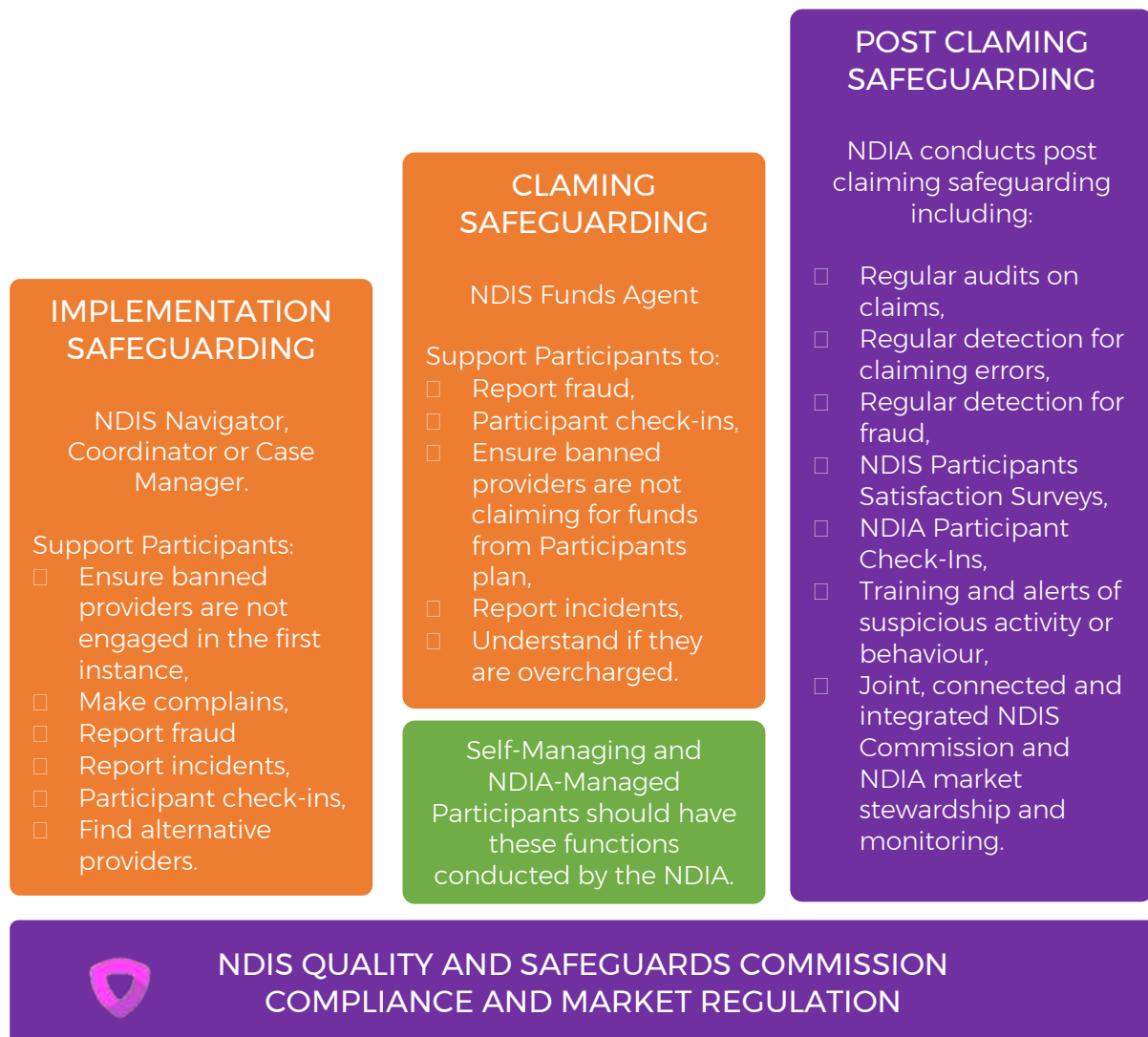
Participants	
Participants currently supported by	NDIS Registered Plan Management Providers
Eligible Participants	All Subject to a risk assessment as defined within the NDIS Act.
Support Package	Flat single price limit
Support Rate Limit	\$135 per month
Providers	
Should Providers need to be accredited	Yes
Delivered by	Open Market (i.e. Participant can choose from a market of Accredited / Registered Providers)

NDIS FUNDS AGENT	
Providers delivering intermediary supports must be prohibited from delivering other supports to the same Participant (save for appropriate exemptions).	Yes
Workforce	
Should Worker Accreditation Be Required	Yes
Worker Specialisation	Base - Financial
Support Functions	
Support Participant to manage the funds within their NDIS Plan.	✓
Support Participants to meet their payment integrity obligations.	✓ □
Support Participants to be active consumers.	✓
Support Participants to understand price limits budgets and NDIA policies.	✓
Support Participants to inform their providers of supports about invoicing and claiming rules.	✓
Support Participants to maintain their claiming records.	✓
Support Participant through claiming funds from their NDIS Plan on their behalf.	✓
Support Participant through dispersing claimed funds to their service providers on their behalf.	✓
Support Participants through communication in a method that meets the Participants need.	✓
Provide Participants with information and statements of their spending in a communication manner that meets their needs.	✓

□

Safeguarding	NDIS FUNDS AGENT
Participant Check-In to ensure Participants understand their plan spend and funds trajectory.	<p>✓</p> <p>At least quarterly or when Participants funds are being over utilised via a communication method that meets participant needs.</p>
As a trusted party representing the Participant interest above all other - Support Participants to report suspected fraud to the NDIA.	<p>✓</p>
Ensure that Participants are not claiming for support from Banned Providers or Partitioners.	<p>✓</p>
Report reportable incidents to the NDIS Commission, including unauthorised restrictive practices.	<p>✓</p>
Support a Participant to understand if they are being overcharged for a support.	<p>✓</p>

This intermediary model builds on the successes had over the past 10 years whilst improving and driving greater quality. This intermediary model also embeds three stage safeguarding for NDIS participants on top of the market regulation and compliance actions delivered by the NDIS Commission with minimal limits to choose and control.



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