



National Disability Services Western Australia

Submission to the

Community Development and Justice Standing Committee's Inquiry into Accommodation and Intensive Family Support Funding for People with Disabilities

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About National Disability Services

National Disability Services (NDS) is Australia's peak body for non-government disability service organisations. Collectively, our 820 NDS members operate several thousand services for Australians with all types of disability. Members range in size from small support groups to large multi-service organisations.

In Western Australia (WA), NDS currently has 77 members and represents a significant proportionate of the disability services sector.

This submission was developed by NDS WA based on consultations with our members. Some members submitted comment via email and 17 members from the NDS Accommodation and Respite Subcommittees participated in a targeted consultation on 13 January 2014.

Introduction and Context

The current inquiry focuses on three main areas, including current processes for determining funding, unmet need, and planning for the future. It is really important to consider these topics within the context of the disability sector in WA and nationally.

The disability sector in WA is experiencing a period of unparalleled change and reform. There has been an ongoing move towards more individualised and person-centred approaches to disability service provision, strengthened in 2013 by the introduction of the WA procurement reforms to support the Delivering Community Services in Partnership (DCSP) policy. 2013 also saw the introduction of the WA 'My Way' pilot project which aims to give people with disability more choice and control. In 2014, National Disability Insurance Scheme (NDIS) pilot sites will also be established in WA. The NDIS has similar aims to the My Way project, focusing on individualised support for people with disability. In addition, government's direction to outsource services, such as the recently announced contracting out of a number of Early Childhood Development and Accommodation Support places, adds a further element of change within the sector.

This effectively means that within the disability services sector in WA in 2014, there will be at least three completely separate models of funding and service provision. Comments made in this submission on 'current processes' could potentially be superseded by new processes such as My Way or NDIS in future. NDS WA recommends that the Committee focus strongly on what the disability sector in WA is likely to look like in the coming years and focus its recommendations accordingly.

With consideration to the context described above, this submission responds to the three key areas identified for the inquiry:

1. The adequacy of current processes for determining funding support for people with disabilities who live with their families;
2. The level of unmet need; and
3. The nature and extent of planning required to meet increasing demand for these support services in Western Australia in the future.

1. The adequacy of current processes for determining funding support for people with disabilities who live with their families

A key process for determining funding supports at present is the Combined Application Process (CAP) administered by the Disability Services Commission (the Commission). In 2012/2013, 1,911 people applied for individualised funding through CAP and other funding streams.¹

1.1 Complexity and transparency

“The CAP funding process is a lottery. – NDS member

A 2007 report by the Auditor General found that the Commission’s process lacked transparency and accountability, and that insufficient feedback was provided to unsuccessful applicants.²

Although changes have been since made to simplify the process, applicants and Service Providers who assist in the process report ‘second-guessing’ the best way to obtain a successful application. In addition, NDS members have found that family members do not always understand the implications of their applications, for example that they may lose existing Commonwealth / block funding as a result of CAP success.

A lack of information regarding the prioritisation for funding has resulted in conflicting perceptions of the process and varied strategies of response.

For example, some suggest that people with challenging behaviour fare better than those with significant physical support needs; some applicants believe that underestimating the need and applying for less support than the person actually needs is more likely to meet with success; others over estimate their necessary supports in preparedness to negotiate down.

1.2 Use of a deficit model

Service Providers indicated that both they and the people they support with CAP submissions feel it necessary to focus on a ‘worst case scenario’ as a strategy to have their application stand out from the many others. Families have expressed that they have to ‘bare their souls’, explain the depths of their despair (most recently by providing medical evidence to support their claims of depression), share intimate

¹ Disability Services Commission, (2013). Disability Support Funding Bulletin, Issue 2, September 2013.

² Auditor General for Western Australia, (2007). Auditor General’s Report: Performance Examination. A Helping Hand: Home-based Services in Western Australia. Report 6 – June 2007.

family details in the application and demonstrate their failure as a family unit . – the more dysfunctional the family, the more likely it is to succeed.

1.3 Responsiveness

Changed need is an area that NDS WA members feel is inadequate in the current CAP process, as people who are competing against someone who has no funding are perceived as less likely to be successful. Also, there is currently no option to review people's funding until a new funding round opens. This means that if a significant change occurs, for example the death of the main carer or significant deterioration of the person's condition, service providers are expected to fill in the gaps until the next round of funding without additional resources.

“We have three people who have been waiting several years to be successful in accommodation funding and half a dozen others who don't want to think about planning for accommodation due to feedback about navigating the system and having the energy and vision to continue to apply for accommodation funding round in and out. I understand that the NDIS is designed to eliminate the CAP process however funding arrangements need to remain at the local level to remain responsive and meet needs.”

- *Comment by NDS member*

Recommendations

1. It is recommended that a separate allocation of funding be retained for changed need and that the move towards more individualised and flexible responses to individual's needs be reflected in funding processes so that needs can be reviewed when significant life changes occur.
2. The selection criteria / priorities for CAP funding should be made clear. More information and support should be available for families on their funding options and the implications of each.
3. If the CAP process is to continue, that training and information be made available to LACs and Service Providers regarding effective submission development.
4. That consideration towards a more positive, outcomes focused process of needs assessment be developed for the longer term- it is hoped that new processes under My Way and NDIS will be more proactive and less crisis-driven, allowing people to plan ahead.

2. The level of unmet need

2.1 Lack of data regarding unmet need

The level of unmet need is difficult to ascertain but it is likely that large numbers of people with disability are currently not receiving any / adequate funding.

Approximately one-third of people with disability in WA who would be eligible for funding from the Disability Services Commission currently do so.³ This is reflected by the recent experience of the NDIS launch / pilot sites elsewhere in Australia which have found that the level of need is higher than anticipated.

While unsuccessful CAP applications are one indication of unmet need, as shown in the table below, many people do not apply because they are not aware of the option, are advised not to by LACs, find the process emotionally challenging or for other reasons.

Table 1: CAP Funding Allocation for Accommodation Support and Intensive Family Support 2012-2013⁴

Note: other service areas are funded by the Commission, this table shows only those under consideration here – accommodation and intensive family support.

Funding type	Percentage of applications:			
	funded under CAP (new package)	receiving changed needs funding	funded through other Commission funding	unfunded through CAP or other Commission funding
Accommodation Support	14.1%	2%	55.1%	28.8%
Intensive Family Support	33.5%	6%	32.3%	28.2%

2.2 Young people residing in Aged Care

Another well-known but as yet unaddressed area of unmet need is the issue of young people with disability living in aged care nursing homes. The recently concluded YPRAC program partially achieved its objectives of establishing more appropriate home support options for this group; however it is understood that the

³ Disability Services Commission. Count Me In - Disability Future Directions.

⁴ Extract from Disability Services Commission (2013) Disability Support Funding Bulletin, Issue 2, September 2013.

Commission has data regarding the significant number of younger people still living in facilities with frail aged and dementia residents.

2.3 Disability acquired through catastrophic injury

People who receive catastrophic injuries represent a significant area of unmet need in WA. The WA State government has yet to fully commit to the National Injury Insurance Scheme (NIIS) which would address this need. In the NDS WA 2014-2015 Pre-budget Submission, WA State Government is urged to fully fund a no fault motor vehicle accident insurance scheme and provide a timetable for full implementation of a NIIS.⁵ Currently, people involved in accidents where they are deemed to be “at fault” and who receive catastrophic injuries go uncompensated, condemning them to a life without the ability to fund supports that they need. NDS WA sees this fact as a serious injustice for Western Australians, and one which must be corrected.

Recommendations

1. There is an essential requirement to accurately determine the level of need for disability services in WA both now and in the future and to plan accordingly. This is described further under number three below.
2. The WA State Government introduce no fault motor vehicle injury insurance in the coming budget and release a timetable for full implementation of the National Injury Insurance Scheme (NIIS) in Western Australia.
3. The issue of young people in aged care nursing homes needs to be urgently addressed with adequate support funding and home options.

3. The nature and extent of planning required to meet increasing demand for these support services in Western Australia in the future

In relation to planning, NDS members identified two main areas for consideration: planning at a state-wide, strategic level, and planning required at a service level with individual people with disability and their families.

3.1 Strategic planning for support and associated needs

At a strategic state-wide level, NDS WA is concerned by the dissolution of the Sector Development Directorate of the Commission, which leaves a number of important strategic initiatives unaddressed, including:

⁵ NDS WA, (2013). Pre-budget Submission 2014-2015.

- The sector development plan, which was intended to guide the development of the state's disability services sector. Significant work was undertaken on this plan over the last two years of population needs, existing services and gaps, including extensive data analysis and stakeholder consultations. However this work has not yet been translated into a plan for the future development of the sector.
- The Count Me In - Disability Future Directions strategy, which establishes 13 priorities to shape a good future for people with disabilities, families and carers in Western Australia.

The Western Australian population will increase by about 22 per cent to more than 2.55 million people by 2023 with most increase in the over 65 age group, and the total number of persons who identify themselves as having a disability will increase by about 38 per cent to around 632,600. Given that there is already unmet need within the existing population, NDS WA is concerned that planning for future services does not become de-prioritised and valuable work completed to date set aside.

In parallel with the push for individualised support options, the State Government needs to give close consideration to public housing demand for people with disability, particularly that of universal design. For example, near Beeliar the Department of Housing is building two multi-storey home unit blocks that are likely to accommodate hundreds of individuals and families. It has not been identified that any of these have been designed for tenants with accessibility or support requirements. The not-for-profit disability services sector should not be relied on solely to identify and address housing needs of people with disability. Disability sector organisations which currently provide most accommodation for people with disability do not have the financial resources to purchase land or dwellings to meet the individualised demand into the long term, nor the infrastructure and specialist skill for larger scale residential development.

3.2 Personal planning with individuals

At a service level, significant time is spent on planning with a person with disability to ensure that supports offered match what the person needs and wants. The disability services sector bring significant expertise to this process, often accessing a multi-disciplinary team to offer a broad perspective for the individuals consideration in their plan, often based on long term relationships with the person and their family. This cannot be replicated by an individual NDIS planner or My Way Co-ordinator, and it is important to utilise the sector's expertise and experience towards effectiveness and efficiency in these new models.

It is argued by NDS members, and evidence indicates, that more comprehensive planning for each individual could in fact result in less reliance on funding in the longer-term.

Recommendations

1. There is a crucial requirement to accurately determine the level of need for disability services in WA both now and in the future and to plan accordingly, collating existing data available from a number of sources, including census data and data held by other agencies such as Department of Health along with resuming work completed by the Commission to date. A dedicated project is recommended to collate and analyse such data to increase knowledge regarding current and future need, and to utilise that data to inform a sector development plan to underpin the development of sector capacity to respond effectively to that need.
2. NDS WA recommends Western Australia use its unique position in trialling both My Way and NDIS to conduct an independent and thorough, evidence-based evaluation and comparison of both pilots take place in WA, so that the best model can be selected for the future. It is also recommended that a quality of life assessment be included for both so that there is a comparison of difference made to the life of the person with a disability.
3. The Commission and Department of Housing must work together to ensure sustainable accommodation options for people with disability. New developments should include accessible and appropriate accommodation for people with disability.
4. My Way and NDIS planning processes should seek input from for the disability services organisations and acknowledge their significant expertise, experience and relationships with people with disability and their families.

ENDS