



Queensland Alliance for Mental Health

Inquiry into the Capability and Culture of the NDIA

Submission

December 2022

Who is QAMH?

The Queensland Alliance for Mental Health (QAMH) is the peak body for the Community Mental Health and Wellbeing Sector in Queensland. We represent more than 100 organisations and stakeholders involved in the delivery of community mental health and wellbeing services across the state. Our role is to reform, promote and drive community mental health and wellbeing service delivery for all Queenslanders, through our influence and collaboration with our members and strategic partners. At a national level, we have a formal collaboration with Community Mental Health Australia and provide input and advice to the work of Mental Health Australia and the National Mental Health Commission where appropriate. Locally, we work alongside our members, government, the Queensland Mental Health Commission and other stakeholders to add value to the sector and act as a strong advocate on issues that impact their operations in Queensland communities.

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Background

QAMH welcomes the opportunity to provide a submission to the Joint Standing Committee on the NDIS (the Committee) as part of its inquiry into the Capability and Culture of the NDIA. The NDIS has experienced a number of challenges in recent years, including an erosion of trust between participants and the NDIA, poor public perception of a system represented in terms of economic liability rather than social investment, and bureaucratic complexity that makes the NDIS stressful, unpredictable and confusing for people to navigate. These failures have culminated in people missing out on life-changing supports and being denied choice and control – a fundamental tenet of the NDIS. QAMH welcomed the Albanese government’s election commitment to reform the NDIS and we believe this inquiry is an important part of that process.

As of 30 June 2022, there were a total of 56,559 Australians with psychosocial disability receiving an NDIS funded package.¹ In many instances, this has been transformative and allowed people to access supports and services they require to effectively participate in society. However, the NDIS has not been without problems. This submission will explore the particular challenges stemming from the failures in capability and culture of the NDIA including:

- Inequitable variation in plan funding
- Recovery coaches as a cost cutting measure
- Pricing arrangements not reflecting real costs
- The inaccessibility of the NDIA
- The NDIA as ‘Custodian of the Data’
- The need for a human rights lens

Our response has been informed by consultation with our special interest NDIS Advocacy Group, comprised of QAMH members who provide NDIS services across the state, and our extensive knowledge of the Community Mental Wellbeing Sector in Queensland.

¹ Australia. National Disability Insurance Scheme. (2022). Explore Data. [Explore data | NDIS](#)

Inequitable variation in plan funding

Variation in plan funding between participants with similar diagnoses and lived experiences is an ongoing concern for QAMH members. The reasons why some people with mental health challenges have been found to be ineligible, or why packages can be for such varied amounts is not clear to either participants or service providers and leaves people increasingly frustrated with the lack of transparency around NDIA processes.

The problem stems from the term 'reasonable and necessary' in the National Disability Insurance Scheme Act (2013), used by the NDIA to make decisions about which supports are required for a particular participant. While the guidelines are meant to assist decision makers, it is obvious that 'reasonable and necessary' remains an inherently subjective term. The NDIA has fundamentally failed to embed objectivity, clarity and transparency in this decision-making process. When life-changing supports are denied or withdrawn by the NDIA with no explanation other than not meeting the 'reasonable and necessary' criteria, it is little wonder that participants become frustrated and disillusioned with the system. It is essential that the NDIA enhances its transparency and better communicates why plans differ between participants with seemingly similar circumstances, and also why plans change after review. This will restore the public's trust in the NDIA as an objective, rational and evidence-based institution.

Recovery coaches as a cost cutting measure

QAMH welcomed the addition of recovery coaches into the psychosocial disability landscape in July 2020, consistent with our belief in recovery-oriented care. Through their expertise in coaching people with severe complex mental health issues, recovery coaches assist people to build on their strengths and increase their capacity to live a full and meaningful life. The inclusion of this important service was an acknowledgement that people with psychosocial disability have different needs to those with physical or intellectual disability.

However, since then, QAMH has become concerned that rather than being a useful addition to the suite of services offered to people with psychosocial disability, recovery coaches have been treated as a cost saving measure. The standard rate for recovery coaching per hour is \$93.34, compared to \$100.14 for support coordination (Level 2). QAMH welcomed the 9% increase to the recovery coach line item in July as a result of the Annual Pricing Review, which was an acknowledgement of the flawed embedded assumptions in the Disability Support Worker Cost Model. However, recovery coaches remain significantly cheaper than support coordinators and this price differential has been perceived by some providers as being exploited. Anecdotally, service providers have reported that participants are having recovery coaches approved at the expense of, rather than in addition to, support coordinators. This suggests that the NDIA does not fully appreciate the role of recovery

coaches. The two roles provide distinctly different types of skills and knowledge and therefore one should not be funded to the detriment of the other.

We hope the Inquiry explores the NDIA's approach to recovery coaches, in particular the patterns of funding in plans. QAMH anticipates that a trend towards supplanting support coordinators with less expensive recovery coaches will become apparent. This is reflective of the less than transparent methods of cost cutting utilised by the NDIA and speaks to a culture of placing budgetary cuts above participants' real needs.

Pricing arrangements not reflecting real costs

QAMH members continually tell us that the real cost of doing business is not reflected in the pricing arrangements. The recent 9% increase to price limits for NDIS supports delivered by disability support workers was welcomed by the sector. However, the flawed assumptions underpinning this model still do not accurately reflect the cost of doing business, meaning that providers of psychosocial disability services fail to recuperate costs. The cost of providing satisfactorily remunerated employment, suitable working conditions, and adequate support and supervision is just not covered under the current model.

Another issue is the provision of staff training required to comply with standards and to provide quality supports to people accessing services. Staff recruited from the disability sector and those with generic disability qualifications (e.g., Certificate III Individual Support) require training to understand the very specific needs of people receiving psychosocial supports. It is not uncommon to recruit staff to work in the NDIS with no formal qualifications, particularly in rural and remote regions where there is a lack of qualified applicants. The significant cost of this training is currently absorbed by service providers, but this is not a sustainable model going forward.

The NDIA consistently fails to appreciate these challenges facing service providers or understand that operating within such tight margins risks the ability to provide high-quality supports. Currently, pricing arrangements are such that providers are forced to employ disability support workers at a Social, Community, Home Care and Disability (SCHADS) Award Level 1 or 2, with little opportunity for career progression. QAMH members frequently refer to two co-existing workforces – the underpaid and casualised NDIS workforce, and the better remunerated workforce funded under state and commonwealth contracts.

The NDIA needs to consider the quality of services it funds. This should mean prioritising better outcomes over seeking the cheapest possible inputs and rethinking structures of remuneration to reflect the real costs associated with delivering services.

The inaccessibility of the NDIA

QAMH members have provided feedback that the NDIA fosters a culture of distance and inaccessibility, despite one of its fundamental principles being to minimise complexity and bureaucracy for providers. When attempting to contact the NDIA for advice on deciphering the pricing arrangements or clarification around a participant's plan, providers report they are passed around to different NDIA staff who give conflicting advice and are not familiar with their particular concern. There is no access to reliable expert advice when clarification is needed, which leads to provider concerns about unintentionally utilising incorrect line items which could impact credentialing outcomes. One provider described her particular anxiety about misinterpreting the pricing arrangements: "If you get it wrong, it's punitive". She admitted to using other grant money to access expert advice on interpreting the pricing arrangements because advice from the NDIA was not forthcoming.

The NDIA has had over seven years to improve its accessibility and customer service processes. With the frequent complaints about handling of enquiries, it is difficult to understand why these front-facing services have not undergone review and improvement.

The NDIA as 'Custodian of the Data'

NDIS participants and service providers must be amongst the most surveyed people in the country. Providers are required to report a vast number of outputs in the NDIS Portal and barely a month passes without a new NDIA survey to complete. While the NDIA collects an extensive amount of data, the public's access to that data is restricted. This reflects the lack of trust that has developed between the NDIA and participants. QAMH would argue that the data, rather than be politicised or selectively released, should be publicly available and easily accessible.

The Data Explorer dashboard provides only the most high-level of information and other reports are often 2-3 years out of date. If it demands such rigorous collection of data, the onus is on the NDIA to provide access to these results. QAMH would strongly encourage the Committee to look at how greater access to NDIA data could be facilitated.

The need for a human rights lens

Recently, there has been much commentary on the language used when discussing the future of the NDIS. It is far too common for people with disability to be framed as a 'burden' or 'drain on society'. Conversations around how the annual cost of NDIS will 'blowout' to over \$50 billion (\$20 billion more than originally estimated by the Productivity Commission), focus on unsustainability and the need to cut costs. In the lead up to the May 2022 federal election, QAMH was disappointed to see arguments

put forward about the skyrocketing costs of the NDIS with higher-than-expected numbers of people entering the scheme. This speaks to a culture within the NDIA of viewing participants in terms of the budget's bottom line, rather than people with a right to live their best life. The attempt to introduce independent assessments was a further manifestation of this culture.

QAMH has welcomed the Minister Bill Shorten's reframing of the conversation, describing the NDIS as an 'investment' rather than an 'economic liability'. This language brings us back to the original concept of the scheme, which after all was meant to be a social investment to produce economic and social gain. Per Capita's report, which estimated that \$1 NDIS funding produces \$2.25 of economic activity, demonstrates the multiplier effect of the NDIS and is a more meaningful way in which to assess NDIS sustainability. QAMH would encourage the Committee to consider the need for a more human rights focussed lens when discussing the future of the NDIS and to remember that people with disability, rather than be seen as problems to resolve, are the reason the scheme exists.

Thank you for the opportunity to comment on the Inquiry into the Capability and Culture of the NDIA. We look forward to reading the Committee's response. Please do not hesitate to contact QAMH should you require any further information.