
NDIS Annual Price Review 2019-2020

Submission prepared by Interchange Incorporated

Kerry Uren, Executive Officer

Interchange Incorporated has prepared two separate submissions for the NDIS Annual Price Review 2019-2020. Travel, Transport, Activity and Group costs are included in this document.

Use of Volunteers will be submitted separately.

Interchange Incorporated is a member organisation supporting a network of twelve disability service providers with common and existing links; ten operate in Victoria, one in South Australia and one in New South Wales. They offer programs and services for individuals, groups, carers and families living with disability.

The unifying feature of our network is their programs and services that empower individuals, support families and enhance community inclusion and participation.

Since the launch of the NDIS, price limits and controls have created challenges for disability service providers, with many choosing to reduce service offerings or cease delivery of some services altogether.

Alongside pricing limits, planners are often not including additional expenses incurred in delivery of services, such as **travel, transport** or **activity costs** within participant plans. The NDIS operating model no longer leaves margin for providers to subsidise these costs and this has created restrictions on service offerings, delivery of supports, and participant choice and control.

For the Interchange member network, the travel / transport conundrum is creating serious concerns, and for many of our providers, the lack of funds to support activity costs for participants and families is having a detrimental effect on choice and participation.

The impact of these concerns varies across metro, regional and rural support, and the issues noted below vary in severity among our network, however, collectively they have reported:

- To address the lack of travel/transport in plans, more activities are being undertaken on site in some instances, rather than in the community. This reduces the participants choice and control and limits their exposure to social and community activities
- Lack of consistency in individual plans regarding the inclusion (or not) of transport costs creates inequitable conditions
- Participants receiving 1:1 support with activities that require a significant amount of travel in their preferred and planned activities are now limited
- Families are often required to fund transport costs for their children, if their budget is limited, which in many instances it is, the child misses out

- Adults with disabilities have limited funds for transport in their NDIS plans
- Many families are unable to reimburse support worker kilometres as their transport allocation does not stretch that far. This is resulting in support workers refusing these shifts and therefore limiting individuals support
- Providers have had to revise destinations to reduce the radius of travel for camps and activities, thus limiting opportunities
- In one region, participants have been using their flexible core funding of social participation for support hours and for motor vehicle use
- Meaningful inclusion in community activities is seriously impacted by transport restrictions
- Transport funding levels from NDIS (for those participants who receive them) are considered self-managed and directly credited to the participant, so providers must invoice the participant directly to receive transport costs, adding more workload to providers
- Invoicing participants directly for travel increases providers' invoices by several hundred a month and adds many hours of debt collection to already stretched employees as well as adding pressure on participants and families to manage payments
- Some families have a larger number of staffing hours but cannot afford additional costs; to reduce the costs they then have staff on a 1:1 basis, removing their peer interaction and becoming more socially isolated
- The number and location of activities and camps has been reduced as many participants do not have the funds in their plans to access them
- In one region, up to 50% of NDIS participants seeking group activities have stated they have trouble paying costs and 25% no longer nominate activities knowing they cannot pay

We asked that the NDIA:

- ⇒ establishes guidelines for travel and transport within the NDIS framework that are non-restrictive and enable ongoing and enhanced community engagement and inclusion
- ⇒ ensures appropriate inclusion of travel, transport and activity costs within the pricing framework to ensure sustainability of choice and control for participants to access a broader range of services

This will also ensure that disability service providers have the capacity to offer flexible, quality support to meet the goals and desires of individuals and families without restriction.

Group prices Case study – Gateways Support Services

NDIS funding for recreation programs has created challenges for many disability service providers since the beginning of the NDIS trials in 2013. Some agencies dealt with this by choosing not to support anyone who had behavioural issues or needed assistance with eating and toileting or used a wheelchair. This enabled them to implement computer-based booking because group ratios could be pre-set.

Some agencies provide NDIS funded groups where you have a relatively stable group of participants who attend 5 days per week. This enables some economies of scale in planning and risk management.

In contrast, Gateways Support Services provides one off recreational programs for children and adults such as weekend activities, school holiday programs and camps, (using centre-based and community based NDIS group pricing.)

These activities take intensive planning to ensure they can offer suitable activities that create great outcomes for participants. This includes matching participants for compatibility, managing risk, and organizing and providing transport including wheelchair accessible buses. Providing transport options that include a wheelchair accessible bus is a significant cost, but it is essential so that children with physical disabilities are not excluded.

Additional to this is non-contact time. It is necessary for delivery of safe and quality services to complete risk assessments, gather information and set goals with participants, liaise with participants and their families, and then to follow up issues and incidents. There is also non-contact time for staff- preparation, venue preparation, planning, costs for nappy bins, cleaning, and picking up and dropping off buses etc.

In July 2018, NDIS group prices were further reduced when it no longer allowed providers to charge the 1:2 rate for 1:3 ratios. This has had a significantly negative impact on the viability of programs. Gateways have delayed making decisions about the future of these programs in the hope that prices would be reviewed and increased. All rates are too low but 1:1 and 1: 2 are particularly problematic. At present, there is no line item for 1:1 complex in the community.

We are aware of other agencies who have stopped providing these services and a major unregistered provider in Geelong has announced this week that they are closing down. We are also aware of services that have deregistered and asked families to self-manage so they can charge higher prices for these services.

Gateways has significant unmet demand for their programs, but they have not increased services as that will only lead to greater losses. We asked that the NDIA:

- ⇒ review group pricing as a matter of urgency and with consideration not only for service delivery time but also preparation and planning
- ⇒ introduce a significant price increase of at least 35% to enable services to be viable so participants have a choice of services rather than the current situation where they may have little or no access to group recreational programs.

This will facilitate social and skill development, better physical/mental health and wellbeing, and independence outcomes for participants, particularly for those with more complex needs. It would also lead to a viable, vibrant service sector which can innovate and develop.