

People with Disabilities WA  
individual & systemic advocacy



## Submission

### NDIS Discussion Paper: Support Coordination

#### National Disability Insurance Agency

People with Disabilities (WA) Inc. (PWdWA) would like to thank the National Disability Insurance Agency (NDIA) for the opportunity to provide comment for their review into the operation of the current support coordination service model.

PWdWA is the peak disability consumer organisation representing the rights, needs and equity of all Western Australians with disabilities via individual and systemic advocacy.

PWdWA is run BY and FOR people with disabilities and, as such, strives to be the voice for all people with disabilities in Western Australia.

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## People with disabilities WA (PWdWA)

Since 1981 PWdWA has been the peak disability consumer organisation representing the rights, needs, and equity of all Western Australians with a physical, intellectual, neurological, psychosocial, or sensory disability via individual and systemic advocacy. We provide access to information, and independent individual and systemic advocacy with a focus on those who are most vulnerable.

PWdWA is run by and for people with disabilities and aims to empower the voices of all people with disabilities in Western Australia.

## Introduction

PWdWA welcomes the opportunity to provide comment to NDIA on the current support coordination service model. PWdWA receives both state and federal funding to provide advocacy around issues experienced by the community concerning the National Disability Insurance Scheme (NDIS).

People's fair access to quality supports under the NDIS is an extremely important aspect of PWdWA's advocacy work at both a systemic and individual level. As the peak consumer voice for people with disability in Western Australia (WA), our submission is compiled on the experiences of people with disability, their families and carers. We have provided case studies where appropriate to furnish our statements.

PWdWA is extremely concerned with the rising number of issues being considered by our advocates in relation to NDIS. The points raised in this submission are reflective of the hundreds of people we have assisted in advocacy on NDIS over the past year (350 in 2019-20) and consultation with the community through surveys and workshops.

This submission provides a number of recommendations that PWdWA strongly urges NDIA to consider. These recommendations have been developed as a result of issues brought to our attention through our individual advocacy work and systemic NDIS work. Our responses are also informed through PWdWA collaboration with Advocacy WA, Ethnic Disability Advocacy Centre, Explorability, Sussex Street Community Legal Service, Midlas and Your Say. Advocacy organisations

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are extremely concerned that the number and complexity of cases relating to NDIS is increasing, in part due to lack of funding for Support Coordination which leaves advocates to fill the gaps in much needed support.

### Submission Format

This submission will answer the questions posed as part of the Support Coordination Discussion Paper.

### Inclusion of support coordination in plans

*What factors should be considered when determining if, when and for how long support coordination should be funded in an NDIS participant's plan?*

PWdWA recommends the following factors be considered when making decisions about Support Coordination funding, noting that each person has their own individual circumstances and needs which should be viewed as a whole, rather than in isolation.

1. **Support Coordination should be automatically included in a first plan.** The ability to navigate NDIS, understand scheme terminology and understanding plans and how they can be used is lacking for many first-time users of the scheme. Many participants are accessing services for the first time in their life and/or the terminology/processes used by the scheme are different to existing disability and community supports. PWdWA recommends a minimum of 12 hours of Level 1: Support Connection should automatically be provided as standard in a first plan, with additional hours or Level 2/3 added depending on the participants circumstances.
2. **CaLD and ATSI populations.** In general, Culturally and Linguistically Diverse (CaLD) and Aboriginal and Torres Strait Islander (ATSI) populations face multiple barriers around utilising their plans. This includes knowledge of available supports, finding supports that meet cultural needs and language barriers. These additional barriers mean that Support Coordination is key to enabling participants to access the supports that are funded in their plan and connect with community and mainstream supports. A minimum of 48 hours of Level 2: Coordination of Supports should automatically be provided as standard in a first plan, with additional hours or Level 3 added depending on the participants circumstances. This takes into account the additional need for translation and interpretation services.

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3. **Participants with limited decision-making capacity.** Supported decision making is not an activity funded in many plans. Participants who require supported decision making should have access to either Level 2 or 3 Support Coordination in *every plan*. This will enable them to make supported decisions about how they will use their plan, help them navigate issues with providers/supports and engage with scheduled and unscheduled plan reviews. This is especially important for participants who historically have relied on others for decision making, and who may not have taken participants preferences into account.
4. **Difficulty maintaining relationships.** Individuals who have difficulty maintaining long-term relationships with NDIA, providers and informal supports should have ongoing access to Support Coordination to ensure they are able to utilise their plans effectively. Ongoing Support Coordination should be provided to help with plan reviews and service provider relationships until a participant is able to manage these activities independently.
5. **Children.** There is a presumption that family/parents should navigate the scheme themselves which has resulted in minimal Support Coordination in children's plans. This places a burden on parents that is not a 'normal' part of everyday life and can lead to stress and difficulties managing other everyday activities. Support Coordination should be provided at minimum in the first plan according to the recommendations set out above.

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*A parent shared that she was fearful to use the funds allocated in her son's plan because she didn't understand what it was for. She had no Support Coordination in her plan and had been encouraged to self-manage. Despite attending a number of workshops provided by NDIS, LAC Partners and other service provider workshops she felt more confused and after 6 months still had not used anything in the plan except the therapy services her son had previously been accessing in the state system.*

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6. **Lack of plan utilisation.** If there has been an underspend in funds for a participant this should be viewed as a red flag that a participant may need additional Support Coordination to utilise their funding.

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7. **Life transitions/significant changes in goals and supports.** Where a participant is going through a major change which will impact on the type of support they need, Support Coordination should be included in their plan to help them manage this transition.
8. **Complex circumstances or needs.** This includes participants who are homeless or at risk of homelessness or seeking to access Supported Independent Living (SIL) or Specialist Disability Accommodation (SDA). It also includes participants involved with the justice system. These are complex systems and often require time and a level of expertise to be navigated effectively. It should also include multi-plan households.
9. **Safeguarding risks.** Participants who have limited informal supports with a single provider are statistically at higher risk of experiencing abuse, neglect and violence. In order to safeguard these participants, they should have access to an independent Support Coordinator. The Support Coordination should be funded with enough hours to enable the development of other safeguarding mechanisms such as a circle of support. Many participants in this category will also require support decision making so it is essential that this is provided by an organisation other than the service provider.
10. **Alternative communication needs.** The amount of Support Coordination funded should take into account the need for alternative or support communication. For example, a meeting may take longer for a person who requires Auslan interpretation or uses a communication system such as Makaton. It would make sense to ensure that funding accounted for the additional time needed to facilitate alternative communication methods.
11. **There *should not* be the presumption that Support Coordination funding will be reduced in subsequent plans.** Factors which would support the reduction of Support Coordination funding may include:
  - a. Plan is consistently being utilised
  - b. Services and accommodation are stable
  - c. No change in support needs for next plan

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12. **Choosing to self or plan manage should not be a factor in determining whether/how much Support Coordination is needed.** Self and plan managing are often chosen for the flexibility it offers.

*Should the current three level structure of support coordination be retained or changed?*

PWdWA supports the three levels of Support Coordination being maintained however when they are included in a participant's plan, price limits and flexibility of use needs to be reviewed.

Many people who currently do not have Support Coordination in their plan are relying on advocates, service providers or using their core funding to access this type of support, especially for their first plans. While the Local Area Coordinators (LACs) should be able to provide some support on an ad-hoc basis, the roll out of the scheme and the focus on planning means that in practice LAC's do not have the capacity to provide this support and are on-referring to advocacy organisations. There needs to be flexibility around which level of Support Coordination is billed, depending on the actual task being performed by the Support Coordinator. For example, not all work to support a participant requires Level 3: Specialised Support Coordination and given the large difference in pricing, having the lower charge applied would stretch a person's funding further. To implement this there would need to be clear guidelines as to when exactly a service provider can charge Level 1, 2 or 3 and transparency from providers in service agreements. It would also require the price limits be reviewed to ensure sustainability and development of a market which can provide the supports flexibly.

1. **Level 1 Support Connection.** This should include:
  - a. Assisting participants to understand their NDIS plan
  - b. Supporting participants to connect/engage with providers, community, and mainstream services
  - c. Support participants to effectively monitor the utilisation of their plan
  - d. Support participants to prepare for and engage in plan reviews

As recommended above, this support should be included as standard in first plans unless it is identified that Level 2 or 3 Support Coordination is also required. Moving forward NDIA

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should adequately fund LAC's so they have capacity to provide this type of support coordination where it is required on an ad-hoc basis by participants.

2. **Level 2: Coordination of Supports.** This level of support should be charged where the participant faces barriers and tasks require a level of skill or training to be completed. For example, this could include supported decision making for a participant with limited decision-making capacity or working with clients who have alternative communication needs e.g. Auslan, CaLD, Makaton.
3. **Level 3: Specialist Support Coordination.** This level of support should be charged where the Support Coordinator requires a particular skill or expertise to engage with specific areas of support. This could include subject specific areas such as housing/justice or types of support like relationship building with participants.

*How should support coordination interact with other NDIS supports? For example, local area coordinators, community connectors, liaison officers and recovery coaches?*

How support coordinators interact with other NDIS supports should always be negotiated with the participant as to what role they want the Support Coordinator to take in each situation. Support Coordinators should always have informed consent from participants before engaging with and exchanging information with other NDIS supports.

Where an activity can and should be undertaken by another NDIS support, especially where the funding for that support does not come out of the participants plan, the Support Coordinator should be working with the participant to understand their rights and access that support. The level of interaction required would depend on the participants circumstances. It would be expected that a higher level of engagement would be needed if:

- a. The participant requires supported decision making
- b. There are barriers to accessing the services
- c. The participant has difficulty engaging and maintain relationships with services

Support Coordinators should be well connected with stakeholders in their geographical region. They should be networking and building connections outside of their direct delivery of supports to ensure they have the capacity to help people implement their plans.

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PWdWA recommends the NDIA clarify under what circumstances a person is entitled to both a Recovery Coach and Support Coordinator as official statements say it is unlikely a person will receive both. If both are granted then it should be up to the participant, their Support Coordinator and Recovery Coach to determine what activities will be undertaken by whom.

Support Coordinators should always provide participants with information about complaints mechanisms for NDIS services and advocacy support if needed.

*How should support coordination interact with and complement existing mainstream services?*

How Support Coordinators interact with mainstream services should always be negotiated with the participant as to what role they want the Support Coordinator to take in each situation. Support Coordinators should always have informed consent from participants before engaging with and exchanging information with other services.

Where the activity can and should be undertaken by a mainstream service, the Support Coordinator should be working with the participant to understand their rights and access that support. The level of interaction required would depend on the participants circumstances. It would be expected that a higher level of engagement would be needed if:

- a. The participant requires supported decision making
- b. There are barriers to accessing the services
- c. The participant has difficulty engaging and maintain relationships with services

Support Coordinators should be well connected with stakeholders in their geographical region. They should be networking and building connections outside of their direct delivery of supports to ensure they have the capacity to help people implement their plans, and access mainstream services.

Support Coordinators should always provide participants with information about complaints mechanisms for mainstream services and advocacy support if needed.



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*What can or should be done to address the level of utilisation of support coordination in plans; and is this any different to general issues of utilisation?*

In WA there is a thin market and people will often be on a waiting list for reputable Support Coordinators who have the expertise to support them. NDIA should be working to build the market and ensure participants have access to quality Support Coordination. This could include working with the NDIS Quality and Safeguards Commission to create a Support Coordination Capabilities Framework and provide training to support the development of skilled Support Coordinators.

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*I tried for two months to get my first one...left message after message and the person never replied...gave up [and] did not find one for 6 more months*

*I couldn't find a support coordination agency that didn't have a month waitlist*  
*PWdWA Support Coordination Survey 2020*

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WA advocates have also found participants who are funded at Level 1: Support Connection are often unable to source a Support Coordinator who will charge at the Level 1 rate as it is significantly less than the Level 2 rate. As a result, participants have no choice but to receive Level 1 support at a Level 2 rate meaning they receive less hours of support than they should.

Additionally, participants lack the knowledge of what help a Support Coordinator can provide. PWdWA recommends that LAC's should be providing participants with information about Support Coordination and if needed, assisting them to engage a Support Coordinator as the first step in their plan. This could include facilitating a meeting with 2-3 Support Coordinators and working with the participant to determine which service best meets their needs.

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*Introduce participants to a small number of Support Coordinators so participants can choose who they'd like* PWdWA Support Coordination Survey 2020

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## **Role of support coordination**

*What functions should a support coordinator perform? Are there tasks that a support coordinator should not do?*

A Support Coordinator should help a participant to understand and navigate the NDIS. This includes (but is not limited to) things like:

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1. How to find and engage a service provider
2. How to understand their funding and what it could be used for
3. How to access information if they don't understand something about the NDIS
4. How to approach issues such as problems with service providers or their NDIS plan
5. Supported decision making about NDIS
6. Engaging in a plan review
7. Engage with complaints and advocacy supports where appropriate
8. Ensuring paperwork and reports are completed in a timely manner by providers
9. Support participant with a change of circumstances

A Support Coordinator should help a participant to connect to their community and mainstream services. This includes (but is not limited to) things like:

1. Identifying options and supporting participant to connect to community
2. Knowing what mainstream supports are available and how to access them
3. Reduce barriers to accessing mainstream supports
4. Facilitating engagement with mainstream supports
5. Engage with complaints and advocacy supports where appropriate
6. Supported decision making

A Support Coordinator should not:

1. Provide support work such as transport, therapy, assistance with daily activities of living etc
2. Provide advice that requires a level of expertise they do not have including behavioural support, legal advice, financial advice etc
3. Tell a person they cannot use their funding for a particular purpose – this is the role of the NDIA. A Support Coordinator should instead support the participant to work through the Reasonable and Necessary criteria to support them to decide if their funding can be used for a particular purpose.
4. Advocate for a person without their informed consent, without first discussing the options available to them.
5. Book service or sign things on behalf of the participant without clear consent
6. Share information without informed consent
7. Manage issues involving their own service even though it may be providing a separate NDIS support.

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8. Recommend services from their own organisation or those they have a vested interest in (e.g. receive payment for referral, financial stake in service)

Additionally, PWdWA believes that Support Coordinators should not be assisting with Internal and External NDIS review. These processes are time consuming and can easily use up most of a participant's Support Coordination funding. However, for this to be implemented there would need to be a significant increase to advocacy funding to ensure adequate advocacy is available to participants who need support to complete an Internal or External Review.

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*A support coordinator reviewed a participant's new plan and without consent submitted an Internal Review. The support coordinator had not explained the plan to the participant. An advocate worked with the participant to understand their plan and the participant determined the plan had adequate supports to meet their needs. The advocate supported the participant to withdraw the Internal Review. The support coordinator had used up funding to complete a task that was not required instead of working with the participant to make an informed decision.*

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With regards to what a Support Coordinator should/should not do, discretion needs to be possible where there are thin markets e.g. regional and remote communities. However, in these circumstances clear policies should be in place to manage conflict of interest.

*Is there evidence that participants with specific plan goals related to education, accommodation and employment would benefit from more targeted support coordination services to achieve these outcomes?*

PWdWA supports the introduction of targeted Support Coordination services. It would be unreasonable to expect all Support Coordinators to have expertise in all areas where a person may need support. Education, accommodation, and employment are all complex systems that require specific knowledge and networks to be navigated effectively. For example, there are many different types of accommodation available such as boarding/lodging, renting, community housing, home ownership, SDA etc. All of these options have their own benefits and disadvantages. It would be important for the person

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supporting a participant to be able to provide appropriate advice so a participant can make an informed decision about their options.

In addition to generalised Support Coordination around NDIS, funding for these specific areas would allow a participant to engage a Support Coordinator with the required experience, knowledge, and skills to provide effective support to meet their goals.

*How could plan management and support coordination be more closely aligned and what would the potential benefits and risks be?*

PWdWA recommends that plan management and Support Coordination remain independent of one another.

There is currently confusion amongst participants about the function of a Plan Manager. The name of the support suggests that the service provides support with managing the implementation of a plan, rather than being a service which assists in managing payments. Better information about the role of a Plan Manager should be provided by the LAC's.

In WA there is a thin market for plan management, with few options being available and waitlists in place. The NDIA pricing for plan management is not encouraging growth in this space either. Advocates experience has been that participants without Support Coordination have sought help from Plan Managers to assist with provider issues and issues with funding from the NDIA. NDIA should review the pricing model for plan management to encourage growth in thin markets.

If Support Coordinators are allowed to also provide plan management, there needs to be a clear separation of functions. It must be clear to a participant what tasks are the function of a Plan Manager and what are the function of a Support Coordinator. It must also be clear how much funding is available for each support. There should be transparency and robust conflict of interest management processes in place regarding payments for their own services.

### **Quality of Support Coordination**

*Should there be minimum qualification requirements or industry accreditation in place for support coordinators? If so, what might be applicable?*

PWdWA does not support the requirement for a minimum qualification or accreditation. WA in particular has a large cohort of individuals with on the job experience who have the

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appropriate skills, knowledge and expertise to provide quality Support Coordination. These individuals do not necessarily have any formal qualifications or accreditations. Having a qualification or industry accreditation does not mean a provider has the skills or experience to be an effective Support Coordinator. There is also no industry accreditation specifically for Support Coordinators.

PWdWA recommends the NDIA should work with the NDIA Quality and Safeguards Commission to develop a capability framework specific to Support Coordination, similar to the Positive Behaviour Support Capability Framework. This framework should focus on the knowledge and skills that underpin contemporary evidence-based practice and would be more reflective of the sectors diverse capabilities. It should focus on providing a pathway for recognition and professional progression.

*How can the effectiveness of support coordination be measured and demonstrated?*

If a Support Coordinator is doing their job effectively, the participants circumstances will either have been maintained or improved i.e. their situation will not have gotten worse. They should be able to demonstrate the outcomes they have achieved including (not limited to):

1. Plan utilisation
2. Service engagement
3. Progress towards plan goals
4. Skills built
5. Support decision making facilitated
6. Participant has choice and control

Additionally, the participants satisfaction with the Support Coordinator and their view on whether the support provided has met their needs, in a timely manner, should also be a factor in determining the effectiveness of Support Coordination. Respondents to the PWdWA Support Coordination survey stated that NDIA should take into account participants views. They highlighted that their services and NDIS interactions should 'run smoothly' if their Support Coordinator is doing a good job and their 'stress' around NDIS is reduced. Most of the survey respondents also stated that an effective Support Coordinator will actively 'check-in' with participants.

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*I will feel supported and increase my ability to work with my providers to get the best out of my plan. I will feel confident to talk to and to meet with NDIS and providers in the future* PWdWA Support Coordination Survey 2020

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*Are there emerging examples of good practice and innovation in support coordination?*

Disability Consulting Services and Growing Space are two examples of services offering innovation and good practice for Support Coordination. Growing Space offers a suit of online resources and information for an annual subscription fee. Innovation often comes from sole traders and the current price limit is making it difficult for small business to operate which to some extent is limiting the amount of innovation occurring in the sector in WA.

*Are the levels and relativities in the NDIA price limits across different services including support coordination working effectively in the interests of participants and a sustainable, innovative market?*

The way the current levels are utilised in plans are not working in the best interest of the participant. Some participants are receiving a prescribed level of Support Coordination which is a higher rate. While some aspects of the support they require would justify the higher rate, support providers are not flexibly using the funding to reflect tasks which are able to be provided at a lower level/rate. For example, someone who has complex accommodation needs many require Level 3: Specialist Support Coordination around housing however Level 1: Coordination of Supports may be sufficient for understanding their plan and choosing other supports. There is no requirement and therefore no incentive for Support Coordinators to charge at the lower rate.

Support Coordination providers are unwilling to provide Level 1: Support Connection and as such there is a thin market for this service in WA and participants are being forced to pay for Level 2: Coordination of Supports reducing the number of hours of support they can access.

It is important to consider that the price limit for Support Coordination levels needs to be adequate to make the provision of the lower level supports feasible for service providers. The current pricing is not feasible for sole traders and is leading to a thin market in WA. Sole traders and small businesses tend to be the leaders in service innovations across sectors so

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PWdWA support an increase in the price limits, but with an associated focus on developing a Capability Framework to ensure that providers have the skills and expertise required to be an effective Support Coordinator.

*Should support coordination pricing be determined, at least in part, based on progression of participant goals and outcomes, and how might this work?*

PWdWA does not recommend that Support Coordination pricing be determine based on progression towards goals and outcomes. Service providers may start to pick and choose clients based on whether they think they can progress the client's goals and achieve outcomes. It could act as a disincentive to support participants labelled as 'complex' or 'difficult' where there are often several barriers to achieving goals and outcomes. This would further limit the number of providers available to this cohort.

Whether a Support Coordinator is able to achieve the outcomes required to demonstrate effectiveness of support should instead be taken into consideration as part of the registration and accreditation process and what level of Support Coordination they are registered to provide.

### **Building capacity for decision making**

*How can a support coordinator assist a participant to make informed decisions and choices about their disability supports? What are the challenges?*

PWdWA recommends that Support Coordinators should be trained in, and able to implement a supported decision-making model. This should start with an assumption that all people can make decisions with the right support. They must have adequate knowledge about the area they are supporting a participant to decide about and provide the participant with the information and resources required to make an informed decision. If they do not have the required expertise, they should be able to connect the participant to someone that does and support the participant to understand that information.

Information must be communicated in a way the participant can understand, including being available in alternative formats such as Easy Read, Auslan, other languages etc.

Participants must also be given adequate time to understand the information provided to them before they are required to decide.

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Respondent to the PWdWA Support Coordination Survey highlighted the importance of their Support Coordinator taking the time to get to know them, their disabilities, requirements, and abilities.

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*By really getting to know me, and to understand what I am seeking in terms of goals, providing timely advice about the options and expanding my understanding of what is possible* PWdWA Support Coordination Survey 2020

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Challenges to supporting participants to make informed decisions and choices include:

1. Lack of funding in plans to ensure Support Coordinators have adequate time to allow for supported decision making
2. Lack of available training about support decision making and how to implement it
3. Lack of transparency around supports including fees being charged for transport, phone calls, report writing, etc
4. Lack of accountability to help people make decisions
5. Historically people with disabilities have been assumed to have limited decision-making capacity and have had substitute decision makers. There is still a pervasive issue in the scheme where nominees and others e.g. parents are making decisions on behalf of the participant without considering their preferences and views.

*How does a support coordinator build a participant's independence rather than reliance? Should support coordination pricing be determined, at least in part, based on building a participant's capacity for decision making to become more independent?*

PWdWA does not recommend pricing being linked to building capacity for decision making. Some participants will always require supported decision making. Linking pricing to this factor provides a disincentive for service providers to engage with participants whose capacity for decision making has limited scope to be increased. This would further limit the number of providers available to this cohort.

To build independence a Support Coordinator should wherever possible support a participant to act on their own behalf and make their own decisions rather than doing something for them. Individual advocacy provides a great model for support, looking at matching the level of support based on the situation and needs of the person with a disability and creating an action plan:



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1. Standing behind: providing advice, guidance, and information to support people to achieve their goals by themselves.
2. Standing beside: working alongside people to support them to achieve their goals effectively. This means being part of the discussion as requested by a person.
3. Standing before: speaking or acting on behalf of a person based on their views and preferences

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*My SC gives me things to do, she doesn't do them all. If something is too difficult she will take that on...she always gives me responsibility for things that need to be done but I know she is there if I get stuck and [she] checks in on me* PWdWA Support  
Coordination Survey 2020

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*How can a support coordinator assist a participant in need of advocacy without acting outside the parameters of their role? What are the appropriate parameters of the personal advocacy role and the support coordination role?*

Assisting a participant to speak up for themselves and self-advocate falls within the scope of a Support Coordinators role as it is about building capacity to make decisions and be independent. Where there is a conflict of interest or the matter is outside the expertise of a Support Coordinator role then a participant should be supported to access an independent advocate. Some services offer paid advocacy support in addition to Support Coordination. There should be regulations in place that prevent a Support Coordinator from providing a paid advocacy service to a person they are also providing NDIS funded Support Coordination to.

### **Conflict of interest**

*In what circumstances is it more or less appropriate for a participant to receive multiple supports from a single provider?*

The decision about who provides a participant supports should be the participant's choice. If the participant can make an informed decision to have a single provider then this is their right. However, many providers will often state that they will only provide supports if a participant engages them to provide all the supports in their plans. In a properly functioning market, a provider should not need to provide all a participant's supports for it to be

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economically viable to take a participant on. Service providers should not be able to make these demands of participants.

**Thin markets** – where there are thin markets you could expect that a person may be accessing a single provider for many/all their supports. This would be more likely in regional and remote areas than in the metro area. Clear conflict of interest processes should be in place where this occurs. Continued work is needed to address the thin market issue. Where a person is accessing multiple supports from a single provider in a thin market, this could be discussed as part of their plan review process with information about new providers operating in the area being presented to the participant, and support to transition to a new service provided by the LAC or through Support Coordination funding if necessary.

**Participants with limited decision-making capacity or limited informal supports** – in these situations it would be a safeguarding issue to have all supports provided by a singular provider. Evidence shows that people with disabilities who have limited supports are more likely to experience violence, abuse, and neglect. PWdWA has seen instances of providers with a person's whole package making claims for increased supports which are not required and making decisions on behalf of a participants which go against their choices and preferences. The lack of support systems around the people in these circumstances makes it easy for service providers to do the wrong thing. Participants who have historically been supported by a single provider should have access to independent Support Coordination to assist them to make supported decisions about their disability services. Where an independent Support Coordinator is not available, a LAC or NDIA planner should support the participant to make an informed decision about engaging other service providers.

*Should the IAC recommendation for the NDIA to enforce an “independence requirement between intermediary and other funded supports at the participant level” be adopted?*

PWdWA supports the idea of independence between intermediary and other funded supports for the majority of participants and their plans. However, we note that there needs to be discretion in the case of thin markets. Where discretion is applied there must be clear guidelines on how conflict of interest will be managed and the NDIA must work with the participant and their supports to move towards independence as soon as possible. We would expect to see targeted market development where there is limited independence and

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the NDIA ensuring funding of technology to allow participants to access independent supports via technology where appropriate.

*What impacts would stricter conflict of interest requirements have on NDIS participants and the NDIS market?*

PWdWA believes that stricter conflict of interest requirements would have a positive impact on participants from a safeguarding perspective. The more people there are around a person the less likely they are to experience violence, abuse and neglect. As long as allowances are made for thin market its should also have a positive impact in terms of accountability and participant choices.

For some participants who have historically been receiving supports from a single provider there is the possibility that they will find it difficult to transition to multiple providers. Adequate help needs to be provided to support them to understand the changes and ensure they can make an informed choice about what supports they use.

### **General**

*What would you identify now as the current critical issues around support coordination?*

1. Clarity for participant about the role of a Support Coordinator and what they can do
2. What it looks like when a Support Coordinator does a good job
3. Adequate funding of Support Coordination in participant plans

*What are the priority actions the NDIA might take to grow an innovative and effective support coordination market in the interests of participants?*

1. Fund skills building for people to become Support Coordinators
2. Provide clarity of role
3. Training in supported decision making