

## General Comments

Governance: The Physical Disability Council of NSW (PDCN) believes that the Draft Strategic Plan 2013- 16 needs to include details outlining how the National Disability Insurance Agency (NDIA) will be governed;

- Key roles and responsibilities
- Organisational structure and decision making process, and
- Corporate independence in policy, funding and governance.
- Conflicts of interest
- Consultative procedures

Eligibility: To ensure that all people with disability understand the relevance of the NDIA Draft Strategic Plan, it is recommended that it contains information about the difference in eligibility criteria and NDIS provisions for tier 2 and tier 3 participants so that all people with disability, not only people who receive funded individualised support packages recognise the importance and relevance of the NDIA Strategic Plan. Additional information would include:

- Tier 2 participants aged 0- 65 years in receipt of local area coordination
- Tier 3 participants aged 0- 65 years in receipt of individual support packages
- Tier 3 participants aged over 65 years who were in receipt of an individual support package prior to turning 65 years.

NDIA Strategic Overview: PDCN would recommend that Goal 1, Goal 2 and Goal 3 be inserted alongside the three goals identified within the NDIA Strategic Overview on page 3.

Minimum performance criteria: The NDIA Draft Strategic Plan 2013- 16 needs to contain information on how performance outcomes will be measured and the minimum performance criteria. PDCN recommends that for each goal that a note is inserted referring to standards identified in the Council of Australian Governments (COAG) Intergovernmental Agreement (IGA) Annex: Integrated NDIS Performance Reporting Framework.<sup>1</sup>

## Culture

Due to the many applications of the word 'culture' in the English language, PDCN would suggest that the reference to 'culture' used in the diagram to illustrate the NDIA Strategic Overview on page 3, be replaced with the term 'organisational culture'.

## Goal 1- Outcome A

The COAG Intergovernmental Agreement Annex: Integrated NDIS Performance Reporting Framework lists the following measures to determine whether organisations meet Goal 1. This Goal identifies the need for recipients to acquire the ability to exercise choice and control in the pursuit of achieving goals:

- Participant satisfaction
- Families and carers satisfaction
- Trends in proportion of participants using different approaches to decision supports

---

<sup>1</sup> Commonwealth Government- Council of Australian Governments (2013) Intergovernmental Agreement Annex: Integrated NDIS Performance Reporting Framework

- Trends in proportion of participants using each or a combination of plan management options
- Proportion of carers receiving additional support

PDCN believes that participants need to be self-empowered and acquire the skills to determine the best mix of Plan option/s. Without these skills PDCN is concerned that carers and family members will become surrogate case managers, and people with disability could still be inadvertently be reliant and dependent on another person. This would not be a desirable outcome and would defeat the objective of the NDIS whilst increasing the dependence of carers and other family members.

### **Goal 1- Outcome B**

Outcome B states the need to promote the independence of social and economic participation of all people with disability, focussing on those who are vulnerable or marginalised. PDCN believes that Deliverable 3 to allow people with disability the opportunity to take risks in fulfilling Goal 1 as an essential part of maturing and learning through experience, and is supportive of the inclusion of this deliverable as part of determining Goal 1 Outcome B.

### **Goal 1- Outcome C**

Whilst PDCN recognises the value of support provided by carers and family members, PDCN does not believe in substituting paid community care with voluntary informal care and support on a regular basis. Nor does it believe that it is normal for family members to be providing personal care to another family member. Subsequently PDCN is not in favour of Deliverable 2 which identifies the need to enable the provision of sustainable care by carers, families and other significant persons for people with disability.

PDCN considers it as desirable to build community capacity and supports in mainstream services for NDIS tier 2 recipients.

### **Goal 1- Performance Outcomes**

PDCN has no further comment on this part of the Draft Disability Strategy.

### **Goal 2 – Outcome A**

The viability of the NDIS has been developed based on the following four economic principles:

1. That the NDIS is based on an actuarial estimate. By using this estimate actuaries can predict future need, and the costs associated with meeting this need. Because this actuarial estimate is a long-term measure it can be adjusted depending on actual costs in a given year,
2. That participants are more likely to take a vested interest as the more immediate charges as this will impact on the future long-term viability of the program, and fees and costs used in the future by service providers,
3. That research and innovation are part of adjusting to personal need, making improvements based on consumer feedback and best-practice, and
4. With increased social and economic participation it is expected that the NDIS will add close to 1 per cent to GDP (gross domestic product). Additional economic and fiscal gains include;

- Increased employment participation by people with a disability in the order of an additional 370,000 people in 2050
- Additional GDP of almost \$50 billion in 2050, which equates to a further 1.4% contribution to GDP
- Increased employment participation by carers, in terms of about 80,000 carers entering the workforce or an increase in the number of hours worked
- A fiscal gain of \$1.5 billion in GDP per annum as a result of increased employment participation by carers.<sup>2</sup>

It is important to consider the Draft Disability Strategy as part of a number of other national initiatives, legislation and programs aimed at recognising the human rights, and inclusion of people with disability, through the following:

- Disability Discrimination Act 1992 (DDA)
- Disability Standards for Accessible Public Transport 2002
- Disability Standards for Education 2005
- Disability (Access to Premises- Buildings) Standards 2010
- National Disability Strategy 2010- 2020

Section 31 of the DDA identifies the intent of the disability standards. As part of this section, disability standards were introduced to identify the requirements implicit in the DDA in a more immediately accessible format and to provide information on the steps necessary to comply with the DDA. Disability standards have been developed on the following sections of the DDA:

- Section 24- Accessible public transport
- Section 22- Education
- Section 23- Access to premises

The outcome identified in Goal 2 Outcome A focuses on the importance of ensuring reliable data for future actuarial estimates. In the past, service delivery estimates have tended to focus on data from specialist disability services funded as part of the National Disability Agreement. In summary these support services have included community support (received by 43% of service users), employment (42%), community access (20%), accommodation support (13%) and respite (12%). More recently the proportion of people with intellectual, physical and psychiatric has roughly been equal, as the proportion of service users with an intellectual disability has decreased over the 5 years to 2011–12.<sup>3</sup>

With the introduction of the NDIS people with disabilities are less likely to receive specialist services and more likely to receive mainstream services. At present data on services used by people with disabilities tends to be predominantly from specialist services, and only available in specialist publications, such as published through the Australia Institute of Health and Welfare, and by the Australian Bureau of Statistics, or by the Productivity Commission within the annual Report of Government Services which only includes data on the needs of people with disability as a completely separate chapter.

---

<sup>2</sup> PriceWaterhouse Coopers (2011) Disability Expectations – Investing in a Better Life, a Stronger Australia

<sup>3</sup> Australian Institute of Health and Welfare (2013) Disability Support Services Bulletin 118

### **Goal 2 Outcome B**

As part of Goal 2 Outcome B PDCN would recommend the availability of relevant information as part of ABS data, AIHW publications and Productivity Commission publications such as the Report on Government Services:

- Early childhood education and care
- Child protection and out-of-home care services
- School education
- Tertiary education and training
- Employment participation
- Housing
- Homelessness services
- Public hospitals
- Primary and community health services
- Mental health management
- Aged services

### **Goal 2 Outcome C**

PDCN has no further comment on this part of the Draft Disability Strategy.

### **Goal 2: Performance Outcomes**

The Draft Strategic Plan identifies the following six Performance Outcomes for Goal 2:

- The NDIS is collecting and reporting appropriate data for actuarial analysis
- Quarterly monitoring reports and annual financial condition reports are on track and appropriate
- Benefits are realised from targeted investment strategies in enhanced disability support
- Short term and long term costs are effectively estimated and managed
- The NDIS research and evaluation strategy is integrated into the insurance and actuarial reporting process
- A healthy market is developing that increases the mix of support options and innovative approaches

PDCN recognises the importance of accessing financial data for actuarial estimates, but also considers it as essential that improvements in social and economic participation are also identified.

### **Goal 3 Outcomes A- C**

PDCN agrees with the deliverables identified for the outcomes included in Goal 3. The aim of this goal is to build community ownership, confidence and pride in the National Disability Insurance Scheme and the National Disability Insurance Agency.

### **Goal 3 Performance Outcomes**

PDCN has no further comment on this part of the Draft Disability Strategy.

### **Technology**

PDCN has no further comment on this part of the Draft Disability Strategy.