

20 March 2017

PRODUCTIVITY COMMISSION ISSUES PAPER SUBMISSION – MAMRE ASSOCIATION INC

Mamre Association Inc (Mamre) submits this letter upon invitation, for the National Disability Insurance Scheme (NDIS) Productivity Commission.

Mamre is a strong supporter of a National approach to providing support and assistance to the many Australians who live with a disability, and therefore submits its comments with a view to supporting continuous improvement.

As of January 2017 Mamre began a relationship with its first NDIS participant. Prior to this, and for several years Mamre has actively engaged in many forums and discussions to assist in understanding the NDIS for its current cohort and for the service itself, to ensure the best outcomes for the people it serves and for the service to remain sustainable, thriving and strong. However, we admit that our practical experience in the world of NDIS is quite limited.

Current Issues

We (Mamre) have similar questions to many other services and many individuals seeking support. These questions are in relation to:

- 1. The importance of investing in pre-planning. Many people and their families and carers have not received the benefits of pre-planning conversations as most service responses are crisis driven and reactive in their nature. For many people, the notion of planning for a good life seems incomprehensible. In Queensland there has been some State Government investment to preparing participants for the NDIS. However, in depth planning conversations has not received the investment it requires.
- 2. The lack of consistency with clear, concise and factual information. It is often left up to the general disability sector to try to navigate their way through "forensic" investigation as to what the information means. There simply is very little capacity within the sector itself to invest in something so time consuming.
- 3. Mamre is not surprised at the higher than predicted numbers of participants requiring support from the NDIA. The level of unmet need is significant. To add to this, there is a distinct lack of community support which, of itself, pushes people towards more "specialised" responses eg. NDIA.
- 4. The level of investment into ILC is critically lacking. Many NFP service providers have invested what little they have, over a long period of time, into community capacity building and strategies for



Service through Community

social change. The ILC appeared to be the "golden egg" for wider social change, however what we are seeing are enormous, unhealthy and unhelpful levels of competition which, of itself, has the potential to lead to the disintegration of the many years of hard work, strong relationships and positive outcomes for people with a disability. This is a direct result of funding becoming the driver, as opposed to a strong vision for healthy communities. The serious lack of funding will cripple the purpose and vision of the NDIS.

- 5. It is clear to Mamre the pricing schedules place enormous pressure on organisations to remain viable and sustainable. Further to this, there is a risk to the participants that quality will be compromised because there simply is not enough funds to ensure appropriate safeguards or review of quality. For many years people with disability, their families, allies, advocates and support services have fought for recognition of the value of people with disability as a worthwhile investment and a basic human right to live their lives equal to fellow citizens. The pricing schedules particularly in the area of core support have significant potential to lead to an increase in the devaluation of people once again through a "de-personalising, factory-mentality" to assisting people with their basic and fundamental needs.
- 6. It is our grave concern to Mamre, that people with cognitive and/or intellectual disability who rely on others to assist in decision making, co-ordination of supports and mechanisms to ensure quality and safety will be disadvantaged should supports co-ordination and supports connection remain short term. Through our experiences with people with disability and their families, we know that for many people this type of support is fundamental to managing and reducing crisis, increasing people's capacity and developing opportunities for inclusion, meaningful participation and social capital.
- 7. Most services simply cannot survive with the pressure of retrospective payment.
- 8. Core Supports, in particular, do not allow for adequate margins for service providers to operate within. We have become more aware of services "picking" who they will support, based purely on the margins the funded plan will provide. We are also aware that service providers are often criticised when there are clear viability issues associated with the pricing and are seeking alternative ways to "bill" additionally against a person's plan which effectively reduces the hours of support the participant will receive. Public "bagging" of these practises is evident through many social media sites. Services DO need to review and make changes if necessary, to their organisational costs, this is not disputed. However, there are many ethical service providers who have retained a strong commitment over many years to those who are vulnerable in our communities, who may be forced to operate in ways that could be questionable or forego current practises that ensure quality, safety and capacity building.



Service through Community

9. The NDIS framework caters very well to those people who have disabilities where capacity for decision making, communication and self governance is not impeded. Mamre does hold deep concerns for those people who have limited capacity to self govern and require sustained, long term intervention and support to manage even the most basic details of their lives. Our concerns also extend to those people who do not have an advocate in their lives and are at risk of falling through the gaps. Consideration of these issues is paramount and challenges the "short term" nature of some aspects of people's approved plan. Whilst we recognise the mechanisms for regular reviews, perhaps some flexibility in relation to review timeframes can be made in relation to these matters eg. "supports co-ordination, supports connection timeframes extended to two or more years".

Summary

As stated in the opening paragraphs, Mamre is a strong supporter of the NDIS. We are seeing very positive outcomes for some participants, and are respectful of the trials and tribulations associated with the enormity of a National change.

It is our hope that, through an ongoing commitment to public consultation and opportunities for feedback, the NDIS will continue to evolve and develop into the future.

Yours sincerely

Rachel Drew
Director
(On behalf of Mamre Association Inc)