

# Information, Linkages and Capacity Building Commissioning Framework

Vision 2020 Australia submission to  
the National Disability Insurance Agency

April 2016

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## General comments

Vision 2020 Australia welcomes the opportunity to provide comment to the National Disability Insurance Agency (NDIA) on the Information, Linkages and Capacity Building (ILC) Commissioning Framework consultation draft. The eye health and vision care sector, in principle, supports the nine proposed outcomes for the ILC. Vision 2020 Australia is pleased that the outcomes are in line with the philosophy underpinning the National Disability Insurance Scheme (NDIS), in particular that they seek to ensure that people with disability have capacity to exercise choice and control in pursuit of individual goals and that independence and social and economic participation is promoted.

There will be a number of challenges associated with the implementation of the ILC Commissioning Framework. It is anticipated that the proposed model of outcomes-based performance measurement will be a cultural, system, capacity and skills adjustment for the blindness and vision impairment services sector. Additionally, the implementation of competitive grant funding for ILC activities will mean uncertainty of funding and increased competition within sector.

Vision 2020 Australia asserts a number of recommendations to the NDIA on how to best prepare the blindness and vision impairment services sector for the ILC sourcing process and outcomes based performance measurements, namely investment in practical training forums, workshops, mentoring and accessible resources. Further, specific safeguards need to be built into the assessment criteria, so that smaller organisations servicing specific sections of the community are able to compete equally. These safeguards will work to ensure that people who are blind or vision impaired have the services and supports they need to fully participate in the community.

## Vision 2020 Australia

Vision 2020 Australia is the peak body for the eye health and vision care sector, representing around 50 member organisations involved in: local and global eye care; health promotion; low vision support; vision rehabilitation; eye research; professional assistance and community support.

This submission has been developed in collaboration with the Vision 2020 Australia Independence and Participation Committee (the Committee). The Committee brings together a diverse group of members providing services and supports to people who are blind or vision impaired across Australia; enabling an unique platform for stakeholders to collaborate, foster consensus and develop a shared understanding on matters of significance affecting member organisations and consumers. Through drawing on the knowledge, experience, and resources of the Committee's broad and inclusive membership, the Committee is central to supporting one of Vision 2020 Australia's key roles as an effective conduit to government, offering a unified and consistent voice.

Vision 2020 Australia broadly supports the submissions put forward by our member organisations, namely Blind Citizens Australia and sector partner Guide Dogs Australia, both of whom provide services and supports to people who are blind or vision impaired, a majority of whom are over 65 years.

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# Summary of recommendations

Vision 2020 Australia recommends:

**Recommendation 1:** that the proposed outcomes are refined to be succinct and concise. Additionally, a terms of reference document should be included with any documentation provided on the ILC.

**Recommendation 2:** that the voices and lived experiences of consumers must be at the forefront of any evaluation measure and recommends a mix-methods approach of qualitative and quantitative data analysis.

**Recommendation 3:** that the NDIA support investment in practical training forums and resources to support transitioning to outcomes based reporting.

**Recommendation 4:** that the NDIA support volunteering to grow in ILC by providing funding for the coordination of volunteers across all service types, regardless of whether they are specific to the NDIS.

**Recommendation 5:** the implementation of processes, such as templates, clear instructions and mentoring programs to assist smaller service providers during the application process.

**Recommendation 6:** the implementation of safeguards to be built into the assessment criteria, so that smaller organisations servicing specific sections of the community are able to compete equally.

**Recommendation 7:** that content and information is made accessible to ensure that people who are blind or vision impaired are at the centre of the ILC application process.

**Recommendation 8:** that at least one person who is blind or vision impaired sits on the ILC team of the NDIA to assess proposals and applications for ILC activities.

**Recommendation 9:** that the ILC funding should be prioritised for the provision of blindness and vision impairment services in regional and remote areas where the prevalence of blindness and vision impaired may be low.

# 1 The proposed outcomes for ILC and the best ways to measure them

## Do you agree with the nine outcomes outlined in the Consultation Draft?

Vision 2020 Australia, in principle, supports the nine outcomes outlined in the ILC Commissioning Framework consultation draft. The proposed outcomes are in line with the philosophy underpinning the NDIS. In particular Vision 2020 Australia is pleased that the outcomes seek to ensure that people with disability have capacity to exercise choice and control in pursuit of individual goals and that independence and social and economic participation is promoted. However, it should be noted that the proposed outcomes are broad and thus open to interpretation. While the proposed outcomes are general, covering the gamut of what we would expect ILC activities to achieve, they are somewhat unclear. Refining the outcomes to be succinct and concise would ensure that they can be met and measured against.

In addition, Vision 2020 Australia recommends that the NDIA develop a key terms of reference document to be included with any documentation provided on the ILC. This document should clearly define and expand on terms such as *informal support*, *unfunded support* and *carer*, which require further clarification if they are to be adequately reported against.

### Recommendation 1

Vision 2020 Australia recommends that the proposed outcomes are refined to be succinct and concise. Additionally, a terms of reference document should be included with any documentation provided on the ILC.

While Vision 2020 Australia, in principle, supports the proposed outcomes, our primary concern is around how the outcomes will apply in practice. For example, Vision 2020 Australia seeks further explanation from the NDIA on whether the outcomes will be prioritised. Should the outcomes be prioritised and tailored to specific ILC activities, it will be important that the NDIA consult with the blindness and vision impairment services sector on the best methodology for implementation.

## How should we measure each of the nine outcomes?

Vision 2020 Australia is conscious that there will be a number of challenges when accurately measuring the nine proposed outcomes for the ILC. For example a number of the proposed outcomes, such as *independence*, *choice and control*, are intangible and will be difficult to measure in a traditional sense. More so, Vision 2020 Australia recognises that it will be difficult to attribute the impact of ILC outcomes when in combination with other support systems. Further, any measurement or evaluation of ILC activities will need to take into consideration the fact that ILC benefits will grow over the longer term and therefore will best be measured at intervals over an extended period of time. It will also be important for the NDIA to acknowledge the differences in how organisations or individuals measure success for people with disability.

In the first instance, before evaluation can begin it will be important for the NDIA to take a snapshot of the services which individuals with a disability are receiving now in order to compare with the services that they are receiving once the NDIS is fully rolled out. Secondly, Vision 2020 Australia contends that the voices and lived experiences of consumers must be at the forefront of any evaluation measure and therefore supports the NDIA's intent to collect data through individual outcome surveys. However, it will be essential that appropriate checks and balances are put in place to ensure that measuring the outcomes is not overly burdensome on the consumer, or provider for that matter.

In measuring the outcomes, Vision 2020 Australia contends that the most suitable means of evaluation is through a mixed-methods approach of qualitative and quantitative analysis. Qualitative data collection will be essential in exploring changes such as an individual's confidence, feeling of inclusion and overall engagement with the community. Complementary quantitative data collection can evaluate the tangible, calculable outputs of a service such as the quantity of volunteers recruited or the frequency of access to services.

## Recommendation 2

Vision 2020 Australia contends that the voices and lived experiences of consumers must be at the forefront of any evaluation measure and recommends a mix-methods approach of qualitative and quantitative data analysis.

## 2 How to prepare the sector for outcomes-based performance measurement

### What are the biggest challenges for organisations moving to outcomes based funding and how can the NDIA help organisations to meet these challenges?

For Vision 2020 Australia member organisations that have typically operated under output based funding, it is anticipated that the proposed model of outcomes-based performance measurement will be a cultural, system, capacity and skills adjustment. In order to lessen the impact on service providers, Vision 2020 Australia recommends a gradual approach to implementation with adequate time, training and funding to ensure service providers are able to implement appropriate data collection systems and reporting mechanisms. It will be important for the NDIA to understand the practical implications for organisations working on the ground as they transition to outcomes based funding, allowing for measurement approaches to be refined over time.

In preparing for this shift it will be important for the NDIA to build on the capacity of the blindness and vision impairment services sector to collect and report on data. Vision 2020 Australia supports the intent of the NDIA to implement a 'toolkit' for ILC providers, this kit should be simple and practical with relevant information on outcomes based performance measurement and the requirements of the ILC sourcing process. It is not known at this stage whether the NDIA will introduce specific tools for measuring outcomes based funding. Should performance measurement tools be introduced, it will be essential that appropriate training is provided. Vision 2020 Australia therefore recommends investment in practical training forums and resources to support transitioning to outcomes based reporting.

#### Recommendation 3

Vision 2020 Australia recommends the NDIA support investment in practical training forums and resources to support transitioning to outcomes based reporting.

### 3 How to grow social capital in the sector, particularly volunteering

The NDIA would like to see volunteering grow in the ILC. What can the NDIA do to make sure this happens?

Vision 2020 Australia contends that the NDIA can best support volunteering to grow in the ILC by providing funding to organisations that support volunteers. The costs of volunteering to Vision 2020 Australia members include recruitment, screening, training, compliance, reporting and monitoring and coordination. Additional expenses associated with volunteering include police checks, working with children checks and first aid training. These costs are currently funded by a mixture of organisational spending, disability funding and aged care funding.

The recent Snapshot of Blindness and Low Vision Services in Australia (Snapshot Survey) conducted by Vision 2020 Australia, the National Disability Services (NDS) and the Australian Blindness Forum (ABF) found that the eye health and vision care sector was supported by volunteer contributions of 17,820 hours per week.<sup>1</sup> This equates to one-third of the hours of the paid workforce, and equates to approximately \$30 million of unpaid support per year. The blindness and vision impairment services sector therefore incurs significant costs in coordinating and managing volunteers that Vision 2020 Australia believes should be fully subsidised by ILC funding.

It is important to realise that volunteers within the eye health and vision care sector work across a broad spectrum of services with a variety of consumers, the majority of which are over the age of 65. Vision 2020 Australia therefore considers that funding for the coordination of volunteers should occur across all service types, regardless of whether they are specific to the NDIS.

#### Recommendation 4

Vision 2020 Australia recommends the NDIA support volunteering to grow in ILC by providing funding for the coordination of volunteers across all service types, regardless of whether they are specific to the NDIS.

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<sup>1</sup> B. Ah Tong, G. Duff, G. Mullen and M. O'Neill, August 2015, A Snapshot of Blindness and Low Vision Services in Australia, Vision 2020 Australia, National Disability Services, Australian Blindness Forum, Sydney.



## 4 How to prepare the sector for the requirements of the ILC sourcing process

### What are the biggest challenges for organisations moving to competitive grant funding and how can the NDIA help organisations to meet those challenges?

It is predicted that the ILC sourcing process will increase competition between service providers, changing the way in which services are delivered and encouraging innovation and efficiency across the sector. However, this increased competition has the potential to negatively impact smaller service providers who may have limited capacity and resources to adapt to uncertain funding and changing performance measures. Competitive grant funding for ILC activities will mean uncertainty of funding and increased competition within the blindness and vision impairment services sector. As a result, services will need to change how they deliver services, building a competitive advantage by differentiating or specialising to suit consumer needs. The blindness and vision impairment services sector may respond to increased competition in one of two ways, namely; diversifying and offering a range of services or specialising in services.

Uncertain funding and increased competition are of significant concern to smaller blindness and vision impairment service providers. Vision 2020 Australia is concerned that smaller volunteer based organisations that may have limited skills, resources, time and capacity may be unable to compete equally in a competitive grant process. This reduced competitive advantage means there is risk of a market which is dominated by just a few large service providers, thereby threatening smaller specialised service providers and quality of services for consumers.

It will be important that the NDIA implements a number of processes to assist smaller service providers during the sourcing process. For example, in developing a 'toolkit' for ILC providers, Vision 2020 Australia recommends the inclusion of a template with clear instructions to direct applicants through the grant writing process. Additionally, it would be useful to include examples of successful grant applications to guide service providers through the process. Equally important will be the facilitation of training forums, workshops and mentoring programs to provide timely advice, clear messaging, guidelines and support to smaller service providers during this process. It will be important for the NDIA to keep the lines of communication open, providing transparency on the timing of grant rounds to allow adequate periods for service providers to prepare and submit applications.

#### Recommendation 5

Vision 2020 Australia recommends the implementation of processes, such as templates, clear instructions and mentoring programs to assist smaller service providers during the sourcing process.

Additionally, in order for smaller organisations to compete equitably in the sourcing process, Vision 2020 Australia recommends that the NDIA implement safeguards to be built into the assessment criteria, so that smaller organisations servicing specific sections of the community are able to compete equally. These safeguards will work to ensure that the market contains the full range of service options wherever possible so that consumers have real choice and control over the services and supports they need to remain independent and engaged with the community.

#### Recommendation 6

Vision 2020 Australia recommends the implementation of safeguards to be built into the assessment criteria, so that smaller organisations servicing specific sections of the community are able to compete equally.

## How can the NDIA ensure that people with disability are at the centre of the application process for competitive grant funding?

In preparing the sector for the requirements of the ILC sourcing process it is essential that all information is made accessible to ensure that people who are blind or vision impaired are at the centre of the application process. All information, including that provided in the ‘toolkit,’ should be produced in a range of alternative formats as per best practice and should be made accessible to all consumers. These formats would include braille, electronic text, audio and large print and where possible, all efforts should be undertaken to ensure these formats are available at the same time as other formats rather than upon request.

Content and information in relation to the ILC application process should be created in ways that support and maximise accessibility. Vision 2020 Australia notes that the Australian Government has endorsed the Web Content Accessibility Guidelines (WCAG) version 2.0 AA rating for all government websites. Vision 2020 Australia recommends that the NDIA develop information relating to the ILC in accordance with these guidelines, considering the varied needs of users, and plan for accessibility from the outset; noting that not all people who are blind or vision impaired access information in the same way and that many individuals have a preferred format. Vision 2020 Australia also encourages the NDIA to involve organisations in the eye health and vision care sector in the development of an information sharing system, to ensure expert knowledge on accessibility needs is available and utilised.

### Recommendation 7

Vision 2020 Australia recommends that content and information is made accessible to ensure that people who are blind or vision impaired are at the centre of the ILC application process.

It is critical to fully involve people who are blind or vision impaired and people with disability more broadly, at all levels of the NDIS to ensure they have genuine input into the developments that affect their lives. Vision 2020 Australia therefore recommends that at least one person who is blind or vision impaired sits on the ILC team of the NDIA to assess proposals and applications for ILC activities.

### Recommendation 8

Vision 2020 Australia recommends that at least one person who is blind or vision impaired sits on the ILC team of the NDIA to assess proposals and applications for ILC activities.

## 5 Rural and Remote

### What does the NDIA need to consider when rolling out ILC in rural and remote areas and how can ILC activities in these areas be better supported or encouraged?

The prevalence of blindness and vision impairment is often low in regional and remote areas and the number of people with individualised plans in thin markets will make it unfeasible for organisations to sustain adequate service provision. Vision 2020 Australia believes that the ILC can help to bridge this gap, assisting organisations to maintain adequate service provision in these areas.

Some of the challenges for the blindness and vision impairment services sector in regional, rural and remote communities includes: significant travel; isolation; lack of supervision or support; and limited access to training. Further, a lack of alternative providers in regional and remote communities means that small providers may be required to support consumers to a higher level and establish costly outreach services without additional funding. Vision 2020 Australia is therefore concerned that rural and remote service providers that may have limited skills, resources, time and capacity will be unable to compete equally in a competitive grant process.

Vision 2020 Australia therefore considers that ILC funding should be prioritised for the provision of blindness and vision impairment services in regional and remote areas where the prevalence of blindness and vision impaired may be low.

#### Recommendation 9

Vision 2020 Australia recommends that the ILC funding should be prioritised for the provision of blindness and vision impairment services in regional and remote areas where the prevalence of blindness and vision impaired may be low.

## 6 Conclusion

In order to prepare the sector for the ILC sourcing process and outcomes based performance measurements it will be essential that the NDIA support investment in practical training forums, workshops, mentoring and accessible resources. Further, specific safeguards need to be built into the assessment criteria, so that smaller organisations servicing specific sections of the community are able to compete equally. These safeguards will work to ensure that people who are blind or vision impaired have the services and supports they need to fully participate in the community.

Vision 2020 Australia appreciates the opportunity to provide comment to the NDIA on this important issue, and welcomes any further participation and discussion on what is an important matter for people who are blind or vision impaired and to the blindness and vision impairment services sector.