



Submission to the National Disability
Insurance Scheme

Planning Policy for Personalised Budgets and Plan Flexibility

February 2021



About Vision 2020 Australia

Vision 2020 Australia is the national peak body for the eye health and vision care sector. Working with and representing almost 50 member organisations, we focus on supporting policy and funding changes to prevent avoidable blindness, enhance eye care delivery and better meet the needs of people who are blind or living with low vision.

Our members span a wide range of areas and are involved in local and global eye health and vision care, health promotion, low vision support, vision rehabilitation, eye research, professional assistance and community support. This means that the work we do in developing sector-supported policy and advice brings a diverse range of expertise and perspectives to bear, and that the perspectives and experiences of both service users and service providers are at the heart of our work.

Avoidable blindness and vision loss in Australia, and our region, can be prevented and treated by working in partnership across government, non-government, private and community sectors. People of all ages who are blind or vision impaired will benefit from these partnerships, with improved access to services that support their independence and community participation.

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Executive Summary

The NDIS is currently undergoing the most significant reforms since its inception. It is understood that these reforms are a response partly to concerns and feedback from participants, partly to recommendations from the Tune Review, and partly to irregularities recognised by the agency.

Vision 2020 Australia appreciates the opportunity to contribute to the design of these reforms so that they enhance the experiences and NDIS outcomes of people who are blind or have low vision.

Vision 2020 Australia's members have been keen to see the duration of plans extended and processes for revision/renewal of plans simplified in instances where a participant's condition and needs are stable. We thus welcome the reforms to:

- Extend the duration of plans for up to five years
- Establish simplified plan check-ins when minimal changes are required.
- Simplify and clarify budget categories.

We do however see a range of opportunities to enhance current proposals so that they can accommodate the particular needs of people who are blind or have low vision, many of whose support needs will fluctuate over time. These opportunities, outlined in this response to the consultation paper, include:

- Offering participants the option to have annual funding released at the start of each 12 month funding period, as has previously been the case.
- Clarifying how an independent assessment will inform a participant's personalised budget.
- Committing to a timeframe for delivery of a draft plan to a participant, in their preferred format, in advance of their planning meeting.
- Including identified additional costs for delivery of a dog guide, such as post-delivery orientation and mobility training, as a fixed item in addition to the funds for delivery of the dog guide itself.
- Including support coordination routinely in the first plans of participants who are blind or have low vision, in order to maximise plan utilisation.
- Including the offer of an annual assessment by a specialist in assistive technology as a fixed item in plans for people who are blind or have low vision, regardless of plan length.
- Consulting with specialists in assistive technology and users who are blind or have low vision during the development of changes to the portal to support the new planning policy, including the upcoming mobile app.
- Articulating how delegates will be able to perform plan check-ins, given difficulties delivering current commitments.
- Reporting data about plan utilisation, budgets, and reviews for specific cohorts, including people who are blind or have low vision, in order to provide transparency about whether they continue to receive appropriate funds.

Implementing these will ensure that the NDIS provides people living with vision loss the autonomy the scheme promised, and the reasonable and necessary supports that will help them live productive and fulfilling lives. Vision 2020 Australia and its members look forward to working with the NDIA and government to deliver on this promise.

Support Through the Planning Process

Simplifying plans and funding

1. Consultation Question: How should a participant's plan be set out so it's easier to understand? How can we make it easy for participants to understand how their funding can be spent?

Previously used funding categories have been difficult to navigate for new participants, sometimes resulting in misunderstandings about what funding is available.

Vision 2020 Australia thus supports the removal of the funding categories of core, capacity and capital as a positive step toward making plans easier to comprehend. Replacing these with simpler fixed and flexible budget categories will likely lead to restructured plan documents that can better reflect what the NDIS enables participants to achieve.

If planning conversations are to be more related to using budgets to achieve goals, then plan documents should be set out in a way that identifies what specific goals a participant has identified, whether fixed, flexible or a combination of budgets are intended to address them, and what specific supports the planner and participant have agreed on. For a participant who is blind or has low vision, the following are practical examples of how this could be achieved:

- Dog guide to facilitate independent travel (fixed budget)
- Help with cooking independently at home (occupational therapy, low-cost accessible kitchen appliances and/or support work accessed through flexible budget)

2. Consultation Question: How can we support participants to prepare for a planning meeting? What might be needed to support participant decision-making?

The introduction of independent assessments (IAs) represents a major change to the planning process that current participants have become accustomed to.

Planning meetings, which were previously discussions about what funding or supports would help them achieve their goals, will now be used largely to help define how participants can deploy a budget which has been predefined by the IA process.

It will be essential that the NDIA ensure that all current participants receive information, in their preferred format, about what the new process will look like, so they can make informed decisions about where they might employ advocates or acquire evidence. A key issue to be communicated is how the independent assessment will be used to determine the budget contained in the draft plan.

To effectively prepare for the planning meeting, participants need to have ready access to the information that will help them understand:

- what is in the proposed plan, and how this was determined (including budget)
- how the process will run,
- the decisions they will be able to participate in at that stage of the process,
- who else can attend,
- who will be involved in decision making, and
- any information they require in advance to make those decisions.

For people with vision impairment, this will require clarity regarding when the specialist advice that will help ensure they get the technical supports most suited to their needs will be provided.

Timing, in particular providing information well in advance, is critically important. Participants must be provided with draft plans sufficiently far in advance of the planning meeting to allow them to consider the contents of plans, determine the nature of any changes they wish to seek, and compile any evidence required to support those changes. It would also be helpful for them to understand in advance what review options are open to them if they are uncomfortable with either the planning meeting or plan outcome.

An opportunity to simplify and enhance information provision

Under existing arrangements, participants report that information about NDIS processes has been difficult to find and navigate. The upcoming reforms provide an opportunity to remedy this if the NDIA is able to create a more streamlined source of information, and promote it as a "one stop shop" where participants can reliably find the resources they require.

As with all aspects of the system, this information should be prepared in a variety of formats, so that it can be efficiently delivered on demand to participants based on their preference.

As part of this new narrative, the planning process should be described in participant-focussed steps so that individuals can understand the next step they will be involved in, and more readily access the relevant information they may require in advance of that. While the kinds of process maps included in the consultation papers are helpful for both agency staff and providers, they include information that may be less relevant to an individual participant who is seeking to engage with the scheme in a streamlined way to secure the support they need.

Figure One below provides an example of how the proposed planning process might be described in a streamlined, participant-focussed manner.

Figure One: Example of a simple, participant-focussed description of the planning process

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| <p>Step 1: Make decisions about your independent assessment.</p> <p>Step 2: Undertake your independent assessment.</p> <p>Step 3: Review your draft plan and work out what else you might need.</p> <p>Step 4: Attend your planning meeting.</p> <p>Step 5: Review your approved plan and decide where it meets your needs. (This step should direct participants toward complaints mechanisms if necessary)</p> <p>Step 6: Start using your supports.</p> <p>Step 7: Check in regularly with the NDIA to make sure your plan is working for you.</p> |
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Ensuring interactions with the NDIA reminded participants which step they were at would help them navigate through what remains a complex process involving multiple staff from the agency and related providers.

Importantly, it would avoid the current circumstance where participants can be 'overloaded' with information that may not be relevant to them at that time or point in their journey through the scheme. This is particularly relevant for people who are earlier in their experience with blindness or low vision who may still be learning how to navigate through information utilising assistive technology and/or tailored strategies. Such an approach helps build not only understanding but confidence in both their own skills and the NDIS as a scheme focussed on supporting their autonomy and decision making.

Fixed and Flexible Budgets

3. Consultation Question: Which supports should always be in the fixed budget? What principles should apply in determining when supports should be included in the fixed budget?

Vision 2020 Australia members are supportive of the decision to replace the core, capacity-building and capital categories in participant budgets with simpler fixed and flexible categories.

Fixed items should include items such as:

- higher-cost assistive technology recommended by specialists, as well as the associated assessment, training and maintenance,
- annual AT assessments for people who are blind or have low vision, given how rapidly technological advances are expanding options (and often increasing their affordability)
- support coordination for all new participants.

Assistive technology and assessments

Appropriate provision of assistive technology to people who are blind or have low vision requires assessment and training processes. When an item of AT is recommended by a specialist, if the specialist further recommends training in relation to that item, this should be included as a fixed item in a participant's budget alongside the item itself. This should also be the case for the provision of dog guides.

Including these as fixed items assures participants that they will be able to pay for the supports they need (and similarly, offers confidence to providers that they will be reimbursed for the services they deliver).

Further, since the needs of people with vision loss change rapidly, as do the technologies used to support them, Vision 2020 Australia recommends that an annual assessment or review of supports by an assistive technology specialist be routinely offered/ included in the plans of people who are blind or have low vision as an ongoing, fixed item so that they can be kept connected to improvements in technology that may deliver significant benefits.

Support coordination – an investment to help maximise plan utilisation

Maximising plan utilisation is an important area that needs to be supported. In smaller more specialised areas such as blindness and low vision, the low prevalence of conditions and associated thin markets/market failure risk can make this challenging for some participants.

Support coordination is a mechanism for addressing these challenges to ensure the scheme is equitable and usable for people with vision loss. This has been recognised by both the NDIA and stakeholders in the sector. The upcoming reforms offer immediate opportunities to enhance its operation and address some of the current challenges. As part of this, Vision 2020 Australia recommends that:

- Support coordination be routinely offered as a fixed item in the first plans of all participants who are blind or have low vision.
- Support coordination for Aboriginal and Torres Strait Islander people with vision loss should be facilitated by Aboriginal Community Controlled Health Organisations (ACCHOS).

Determining reasonable and necessary funding

4. **Consultation Question: How can we assure participants that their plan budgets are at the right level?**

Provide cohort specific utilisation data

Collecting and sharing more transparent, regular data that provides information in relation to specific cohorts would be a valuable way of communicating both how budgets are being expended and the level of requested review activity and comparing these across the breadth of primary disabilities. For example, the NDIA should release information in relation specifically to people who are blind or have low vision about:

- Their average plan budgets.
- The changes in average plan budgets overtime,
- The number of reviews requested, and the results of these, and
- The utilisation of their plans.

This kind of benchmarking would provide a quantitative way of monitoring expenditure of funds and getting proxy measures (for example, through number of requested reviews and their outcomes) of current participants satisfaction with existing budgets.

Ensure assessments accurately determine the needs of people who are blind or have low vision

To convince people who are blind or have low vision that their plan budgets are appropriate, the NDIA must reassure them that independent assessments, which are intended as the most significant deciding factor in their budgets, are fair, and can capably recognise their needs.

Vision 2020 Australia members report cases where insufficient knowledge of vision impairment in the current assessment workforce have led to participants receiving sub-optimal supports or being denied supports recommended or prescribed by specialists. The sector remains concerned that the introduction of independent assessments (IAs) could exacerbate this problem which in turn would reduce confidence amongst the blindness and low vision community that the planning process is fair, transparent or understanding of their needs.

Vision 2020 Australia's submission to the NDIS Consultation Paper on the proposed new Access and Eligibility policy addresses these issues and identifies some practical changes to the design and delivery of IAs to ensure that the new approach to assessment delivers improved outcomes for people who are blind or have low vision.

Plan implementation

Supporting participants to utilise more flexible plans

Vision 2020 Australia strongly supports the changes being made to increase plan flexibility, which will significantly benefit participants – particularly if this is not accompanied by additional reporting obligations.

5. **Consultation Question: What new tools and resources should we provide to support people using their plan and new plan flexibilities?**



As suggested earlier, it would be ideal if information could be arranged in a way that is aligned to the key steps for participants as they go through the planning process so that all the way through, the focus on supporting participants to achieve their goals is emphasised.

Vision 2020 Australia members have emphasised the need for all tools and resources to be readily available to participants at the time they are most likely to need them rather than presented in a way that runs the risk of information overload and leaves it to participants to wayfind through to the specific information they need.

As various points in this submission have emphasised, it would also be helpful to look at how/where specific resources might be developed for participants who are new to the scheme, whose information needs are likely to differ to those who have been participating for some time.

Accessible formats are also important for all tools and resources. Vision 2020 Australia has appreciated the substantial body of work that has been done by the NDIA to improve the accessibility of information for people who are blind or have low vision. As the portal is enhanced and the upcoming NDIS mobile app is developed, we are keen to ensure that accessibility for people who are blind or have low vision is embedded in their development/enhancement.

Release of funds

Vision 2020 Australia's members are supportive of the NDIA's intention to increase the potential length of plans to up to five years. The increased flexibility and rolling over of plans that have occurred during the COVID-19 pandemic have illustrated that such changes can deliver benefits to participants by supporting greater continuity of service and reducing some of the time, cost and anxiety that frequent reviews can generate.

8. **Consultation Question: How best to handle the timing of the release of funds into plans and rollover of unused funds?**

While the extension of plan durations is welcomed, the blindness and low vision sector has reservations about the proposed shift from releasing annual funds at the beginning of the funding year to funds being released at either monthly or quarterly intervals.

This change is likely to be problematic for someone with newly diagnosed vision loss, who may need to purchase a range of equipment and services up front to manage their condition. Also, it may prove problematic if someone has a variable visual condition which means it is difficult to reliably plan expenditure.

For people who have recently suffered vision loss and haven't yet received appropriate AT, or those still receiving training in use of screen readers, managing more frequent payments and planning around these is likely to be particularly burdensome.

Vision 2020 Australia therefore recommends that participants should still be allowed to have funds released at annual intervals, regardless of plan length. The annual release of funding has been acceptable previously, and has allowed people to plan ahead, without needing to undertake frequent interactions with either the NDIA or plan managers.

Plan Check-ins

Vision 2020 Australia's members support the introduction of plan check-ins as a mechanism via which participants can seek minor variations in their plans, however their success will rely on there being a sufficient and suitably qualified workforce to conduct the check-ins.

It is noted, for example, that Local Area Coordinators struggle to deliver on their current commitments, and would likely struggle to assume this role.

In developing this function, it will be helpful for the NDIA to clarify:

- Who will be responsible for representing the NDIA in a check-in
- How long the NDIA should take to respond to a check-in request from a participant.
- How long the NDIA should take to introduce a plan variation discussed in a check-in.

9. Consultation Question: How should check-ins be undertaken? Under what circumstances is a check-in needed? Who should be involved in a check-in?

Check-ins, unlike independent assessments, could more readily be performed remotely, but the capacity should exist for a participant to request an in-person check-in if they would prefer.

Additionally, as with all other aspects of the scheme, plan check-ins for Aboriginal and Torres Strait Islander Peoples should be conducted both in person, and by someone with an appropriate understanding of cultural safety (ideally appropriately resourced ACCHOs).

Check-ins should be triggered when a participant is either exhausting their funds very quickly, or not utilising their funds at all.

Participants should be clearly informed that they can have a support person accompany them during a check-in, as is the case for all other interactions with the NDIA.

Plan check-ins should also allow participants to submit reports from specialist providers requesting the inclusion of supports that have been identified since the last check-in, which would be provided as fixed items.

10. Consultation Question: How often should we check-in with participants in different circumstances?

Plan check-ins, if delivered successfully, could be a valuable mechanism for helping participants understand the scheme, as well as introducing plan variations to address emergent needs. This could be especially valuable for participants who are new to the scheme (such as those with recently acquired vision loss) who are still establishing which supports will work best for them.

Vision 2020 Australia therefore recommends that plan check-ins be conducted more frequently for people who are new to the scheme. For example, new participants could choose to have plan check-ins conducted quarterly.

Check-ins could also coincide with intervals of funding release or plan rollover. This would help ensure that participants understood when they are going to receive funding and when funding will no longer be available.

Participants could choose to conduct plan check-ins less frequently once they are:

- Accustomed to NDIS processes,
- Appropriately connected with service providers, and
- Accessing their plan funding.

Introducing the New Planning Model

11. Consultation Question: How can the NDIS ensure positive relationships between participants and planners?

Building participant trust and confidence in the planners' capacity to listen to, understand and appropriately respond to their needs will be essential for the maintenance of positive relationships.

To achieve this, planners will need to have sufficient knowledge of the participants particular needs, display strong empathy, and understand that change can be very challenging for participants if they rely on routines and other strategies to manage the functional impacts of their disabilities.

Providing greater clarity around how the new scheme will work, what safeguards there are to ensure that the more specialised needs of groups such as participants with blindness or low vision are met, and an open transparent flow of information regarding decision making will all be important.

It will also be essential that planners utilise expert advice from specialists when working with people with low prevalence disabilities such as vision impairment.

12. Consultation Question: How can we best support participants to transition to this new planning model?

There are a variety of positive aspects of the new planning policy, such as increased flexibility within both plan lengths and budgets. The NDIA should proudly highlight these developments, while establishing highly effective and transparent processes for providing information and addressing concerns.

A range of the suggestions made in this submission will help enable smooth transitions to the new planning model by building the confidence of participants and the broader blindness and low vision sector that the agency and government has really heard, understood and responded to their concerns and suggestions for improvement.

These include:

- Offering participants the option to have annual funding released at the start of each 12 month funding period, as has previously been the case.
- Clarifying how an independent assessment will inform a participant's personalised budget.
- Committing to a timeframe for delivery of a draft plan to a participant, in their preferred format, in advance of their planning meeting.
- Including identified additional costs for delivery of a dog guide, such as post-delivery orientation and mobility training, as a fixed item in addition to the funds for delivery of the dog guide itself.
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- Articulating how delegates will be able to perform plan check-ins, given difficulties delivering current commitments.
- Reporting data about plan utilisation, budgets, and reviews for specific cohorts, including people who are blind or have low vision, in order to provide transparency about whether they continue to receive appropriate funds.