

National Disability Insurance Scheme Review Secretariat
Department of Premier and Cabinet
PO Box 6500
CANBERRA, ACT 2600

Re: NDIS Review - Pricing and Payment approaches in the NDIS market - NSW Carers Advisory Council submission

Dear Committee Secretary,

The NSW Carers Advisory Council (the Council) writes to you about the findings from *The role of pricing and payment approaches in improving participant outcomes and scheme sustainability* consultation paper.

The Council provides advice to the NSW Government on legislation, policy and other matters relating to carers. For more information, about the Council and our members, the majority of whom are carers, please visit our website at www.facs.nsw.gov.au/inclusion/advisory-councils/carers.

Following are the Council's responses to the focus areas for further consultation.

Finding 1: There are opportunities to improve NDIS pricing arrangements over the short- to medium-term

This would also need to include research on where market failure has taken place and whether the reason for such failure is price and/or other factors such as the informal support from a carer, availability of appropriately trained staff, adequacy of participants' plans etc.

Pricing in such circumstances should also include the role of informal support from a carer who themselves maybe isolated and therefore warrant an increase in the participant's plan to factor this in.

This approach would need to include the participant, where appropriate, and/or their carer to ensure the supports being offered were appropriate to meet the participant's needs in the first place.

Finding 2: The fee-for-service payment approach rewards NDIS providers for the volume of supports they deliver, rather than for supporting participants to achieve outcomes

A number of considerations would need to be taken into account if an outcome approach is to be taken. Firstly any system would need to ensure service providers do not cherry pick participants where outcomes are seen to be more favourable to being achieved, leaving out those with more

complex needs. Any outcomes-based approach would need to factor in any benefits the carer of the participant is receiving, e.g. respite, and be recognised as part of the outcome for the participant's plan. Where appropriate the carer should be involved in the planning to ensure the carer's knowledge is utilised and the carer's needs are included. The outcome-based system should not penalise service providers where outcomes may not be met due to changing circumstances, a participant's inability to achieve an outcome because of an ineffective plan or deterioration in health. The development of resources and implementation of any outcome-based plan should be included in the fee paid to the service provider.

The Local Area Co-ordinators and NDIA planners would need to be appropriately trained in the design, monitoring and evaluation of outcome-based planning/funding. This should include how to work with the participant and where relevant their carer.

Finding 3: A lack of transparency around prices, volume, quality and outcomes is restricting the effectiveness of NDIS service delivery

Requirements for disclosure should go beyond just the price, but what is included in the price. Carers have identified an increase in the amount of administrative work that comes with the NDIS and the different levels of administration required for people who self-manage as opposed to those who have it NDIA managed. A lower price in some circumstances can mean a higher amount of administration for the carer and participant.

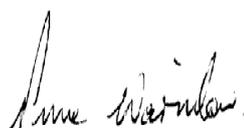
Finding 4: Removing price caps could place pressure on scheme costs. Instead, the focus should be on foundational market reforms that help align incentives for participants, providers and governments

Resources should be made available for participants who rely on the support of a carer to assist with access to the information, and to assist with decision making and the development of an appropriate participant plan.

On behalf of the Council and carers across NSW, I ask that you review our feedback taking into consideration needs and the role of carers. We also give permission for our submission to be published.

If you wish to discuss this further, please contact me on 0408 020 904 or at NSWCarersAdvisoryCouncilSecretariat@fac.s.nsw.gov.au.

Sincerely,



Prue Warrilow
Chair – NSW Carers Advisory Council