



Consultation on WA NDIS Draft Self-Management Policy and Pricing Framework

February 2017



people with
disabilities
western
australia



TABLE OF CONTENTS

1. INTRODUCTION	2
2. LIMITATIONS	3
3. CAPACITY TO SELF-MANAGE	4
3.1 WHAT THE DATA SAYS	4
3.2 ANALYSIS AND DISCUSSION	5
4. RESPONSIBILITIES OF SELF-MANAGEMENT	7
4.1 WHAT THE DATA SAYS	7
4.2 ANALYSIS AND DISCUSSION	8
5. MANAGEMENT PLAN	10
5.1 WHAT THE DATA SAYS	10
5.2 ANALYSIS AND DISCUSSION	12
6. SUPPORTS	12
6.1 WHAT THE DATA SAYS	12
6.2 ANALYSIS AND DISCUSSION	14
7. SAFEGUARDING	14
7.1 WHAT THE DATA SAYS	14
7.2 ANALYSIS AND DISCUSSION	16
8. FLEXIBILITY	18
8.1 WHAT THE DATA SAYS	18
8.2 ANALYSIS AND DISCUSSION	19
9. PRICING CLUSTERS AND FRAMEWORK	20
9.1 WHAT THE DATA SAYS	20
9.2 ANALYSIS AND DISCUSSION	22
10. CONCLUSION	24
11. RECOMMENDATIONS	25
APPENDIX 1	27
APPENDIX 2	28

Acknowledgements: WAI S and PWDWA express their thanks and gratitude to everyone who took the time to attend a workshop and/or complete one or both of the surveys. We hope we have faithfully represented your collective voice. We also acknowledge the significant contribution of Dr Leighton Jay from Sotica who assisted us throughout this project.

Executive Summary

In December 2016, DSC contracted WAI S and PWDWA to undertake a public consultation on the WA NDIS draft Self-Management policy and the draft Self-Management Support Clusters and Pricing Framework. Using a combination of surveys and workshops, we successfully engaged well over 150 people across WA's major holiday period of December and January.

The feedback that we received sometimes pointed consistently in particular directions while on other occasions demonstrated that very diverse views exist. One of the clearest revelations is that participants and representatives value 'flexibility' very highly. They expect that self-managing their services will support and enable these arrangements to be flexible and responsive when circumstances change. They clearly do not want self-management to involve more bureaucratic processes and engagement than is absolutely necessary.

Respondents were very clear that when it comes to determining 'capacity to self-manage' this must be understood in a developmental way. They were equally clear that participants and their representatives should be the Plan Management Option decision makers in all but a few exceptional cases. In making their decisions, participants and representatives need to have clear, simple and adequate information available to them. They want to be able to draw upon the supports that will assist them to develop and maintain their capacity to self-manage as they wish to do so. We recommend the Plan Management information be deleted from the policy and replaced by a short checklist. This will assist both the person making the decision and the LC to be clear about the responsibilities associated with self-management. It will also assist the person to consider how they will fulfil their responsibilities in each of the designated areas.

Safeguarding was noted as an important area, although the feedback we received varied greatly in terms of providing specific suggestions that are likely to increase the safety of vulnerable people with disability. The recent release of the NDIS Quality and Safeguarding Framework is of greater significance and will have an impact on this and other WA NDIS policies. Significant co-development work will be needed on this front. The developmental, preventative and corrective domains approach has much merit and aligns well with the developmental approach to capacity.

The Pricing Clusters and Framework attracted significant feedback, with many people being most concerned about the price range pertaining to core supports such as daily living, well-being and having a break. Our strongest recommendation is that WA NDIS apply the Service Providers' Pricing Clusters and Framework to self-management. Several compelling reasons informing and supporting this recommendation are detailed in the Report.

1. Introduction

In December 2016, WAiS and PWDWA were contracted to undertake a public consultation on the WA NDIS draft Self-Management policy and the draft Self-Management Support Clusters and Pricing Framework. We consider that engagement with the consultation was high, despite being held over the summer holiday period. One hundred and seventy people responded to an online survey about the draft policy and 150 responded to the draft self-management clusters and pricing framework survey. Easy read and plain English versions of these surveys were created and distributed throughout our networks. The survey instruments are provided as separate documents accompanying this report. Additionally, more than 50 people also participated in one of three consultation workshops conducted in mid-January (two in Perth and one in Busselton).

In order to maximise transparency and engagement throughout the consultation process, we adopted and used (with permission) the International Association for Public Participation's *Spectrum of Public Participation* (see Appendix 1). We clarified with DSC that this consultation process is at the IAP2 Spectrum's 'Involve' level in which the stated goal of public participation is: *To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.*

Accordingly, DSC's 'promise to the public' at the 'Involve' level is to *work with you to ensure that your concerns and aspirations are directly reflected in alternatives developed and provide feedback on how public opinion has influenced the decision.* In structuring and writing this report, we have attempted to ensure that providing feedback to public stakeholders will be a relatively simple process for DSC. **We recommend that DSC provide clear, direct and timely public feedback identifying and explaining how the data in this report has impacted on the policy and the pricing clusters and framework.**

Following discussions with DSC's Policy Directorate, it was decided not to release the draft policy as an intact document that people could read and on which they could comment as a whole. This decision was based on the very early and under developed draft policy and draft framework. Accordingly, we quoted all content and excerpts from the draft documents in the surveys and focus groups as a means of focusing feedback and discussion. While releasing the draft policy as a whole document makes some sense, we believe that this may prove to be counterproductive and distracting in the current context.

The report has nine following sections. Section 2 identifies and summarises limitations associated with the consultation. Sections 3 to 7 report data relevant to key subsections of the draft policy. Each section has two subsections: data reporting and analysis and discussion, with the latter drawing on other material as appropriate. Section 8 discusses flexibility. Section 9 addresses the Pricing Clusters and Framework and Section 10 lists the recommendations.

2. Limitations

There are several limitations to the consultation process that must be highlighted. Firstly, the consultation process was carried out across the summer holiday period with little advance notice to people that the opportunity was coming. This may have contributed to lower levels of engagement than might otherwise have been the case, although we are pleased with the engagement we received.

We received criticism about the questions posed. An online survey format necessarily restricts what can be asked and how open-ended the response options seem to be. We acknowledge that some respondents noted that the choices to some questions seemed to 'lead' them to particular responses.

To offset this limitation, we provided open-ended response opportunities after each survey question and we note that the majority of respondents provided comments to multiple questions. An example of the sort of criticism we received (note also the positive suggestions it includes) can be seen in this comment to Q2 (about factors to consider when deciding on a person's capacity to self-manage):

It is dangerous to stipulate tick a box factors. The NDIS is supposed to offer individuals choice and control and this includes the choice to self-manage. A person should not be denied this opportunity because they are unable to demonstrate competency in the "usual" ways. Competency should be assumed.

Additionally, we paid particular attention to the open-ended comments during data analysis. The report explicitly discusses apparent discrepancies between survey responses and the themes and content of comments. Despite the criticism received, engagement with the consultation process overall was strong and provides DSC with important guidance in finalising the self-management policy.

Our analysis of the data reveals a very wide range in knowledge, skills and practical experience of self-management. It is evident that a few respondents have very limited experience of self- or shared-management. Others have extensive experience, and many are currently self-managing their supports within one of the two WA NDIS Trial Sites, the NDIA Trial Site or outside the trial sites. It is evident that the instructions people receive, the practical tasks and requirements associated with self-managing, and the nature of the support and guidance available all vary significantly between these contexts.

A further point to note is that the scope and range of input necessarily means that some of the ideas, suggestions and recommendations in this report might be more relevant to procedures and guidelines rather than to the policy itself. The determination as to what best fits into policy and what best fits into procedures is DSC's to make.

A final limitation is that the consultation has revealed some ambiguity about the extent to which the policy applies to 'shared management' of individualised funding. Until recently, shared management has largely been

seen in the sector as a form of self-management in which service providers effectively operate as ‘financial intermediaries’. Certainly, many individuals and their representatives have interpreted shared management in this way.

However, in our opinion, shared management is a version of the ‘organisation managed’ Plan Management Option in a WA NDIS context. This is because a) funds are dispersed to and managed by an organisation not the person; and b) the organisation maintains significant accountability for how the funds are used. **We recommend that this be clarified in the Policy Statement.**

3. Capacity to Self-Manage

3.1 What the Data Says

Over 80% of respondents to the survey agreed that the need to determine a person’s capacity to self manage should be included in the policy (see Fig 1). Of the remainder, half disagreed and half were unsure. 95% of survey respondents said that it was important or very important that the person wanting to self manage understands that the funding is to help them achieve the outcomes in their plan.

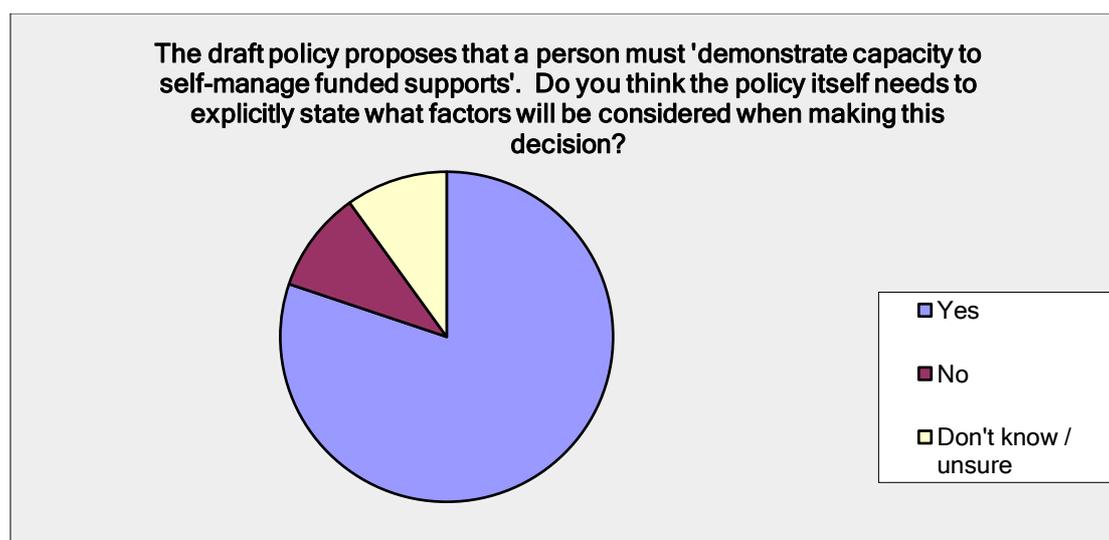


Fig 1: Survey responses to Q re need to demonstrate capacity to self-manage

Despite the apparent clarity of these scores, commentary about capacity to self-manage shows that this is not necessarily as ‘black and white’ an issue as the scores suggest. The following three points capture the main themes of comments to Q1 and were the most discussed issues in the workshops:

- a) who makes the decision about someone’s capacity;
- b) capacity should be assumed; and
- c) people need to be given adequate and appropriate opportunities and support to develop their capacity to self-manage (see the discussion of Management Plan below).

In relation to the issue of ‘who makes the decision?’ there were more survey comments supporting the options of ‘assume capacity’, ‘the person/representative should make the decision’ and ‘the LC may not be the

right person to make this decision' than there were supporting the idea that LCs should make this decision.

Consistent with the survey comments, many workshop attendees felt very strongly that (1) a 'presumption of capacity' should be the starting point for considering a person's capacity to self-manage; and/or (2) that the person or their representative should make the decision.

Self-management can sometimes be complex for a variety of reasons that can include (but are not limited to) complex individual support needs; industrial relations laws; other legal responsibilities; recruiting, training and managing staff; account keeping and funding acquittals etc.

The assessment of capacity to self-manage must include consideration of a person's ability and willingness to develop their self-management skills, knowledge and capability with appropriate support. Therefore, a person's willingness and ability to commit to ongoing learning about self-management should be inherent in the meaning of 'capacity' in the context of this policy.

We recommend that the following definition of capacity be included in the Definitions (Section 5) of the Self-Management Policy: Capacity refers to having the ability, willingness and time to self-manage and/or develop and maintain the knowledge and skills needed to self-manage given appropriate support and opportunity.

3.2 Analysis and Discussion

There is little doubt that the qualitative data should receive more weighting and attention than the quantitative responses. Questions in the quantitative survey provided respondents with limited options based on what is already in the policy document or readily deducible from it. When given open opportunities to comment on the policy, it is clear that respondents want additional or different options.

For example, in the Self-Management Policy survey, Q1 asks whether:

- i. a person needs to demonstrate their capacity to self-manage; and
- ii. whether the policy needs to identify criteria that inform the decision.

The 40 comments clearly show that the overwhelming quantitative 'yes' answer refers to the second part of the question. There are 15 comments supporting the inclusion of explicit criteria with none opposing it or expressing ambiguity on this point.

In contrast, there is only one comment that clearly states that the person should need to demonstrate their capacity, compared to six comments that were at best 'ambiguous' on this point and 14 that were very clear that either demonstrating capacity should NOT be required and/or that DSC personnel should not be making the decision. The following two comments from people who responded 'yes' demonstrate this point:

- *The policy is ableist to even assume people are not capable of self-managing. . . . This should be: when do we decide someone cannot self-administer?*
- *There should be some key indicators that the person can think about before they even consider self-managing.*

Question 3, which invited ‘any other comments about capacity’ resulted in a further 80 comments of similar sentiment:

- *Capacity should be assumed*
- *The knowledge and skills necessary for capacity can be learned and support should be available and included in plans to enable this to happen*
- *The criteria used to determine [a person’s] capacity needs to be fully transparent and easily understood*

WAI’s recent experience in supporting people to understand what self-management involves confirms the qualitative data: individuals, family members, LCs and service providers all benefit when investments are made to develop their knowledge and skills¹. Such investments enable LCs to have better conversations with participants and their representatives, and enables participants and family members to make informed decisions about their capacity to self-manage. They are also better able to identify their ongoing development and learning needs.

I self-manage my [family members] Commonwealth NDIS Plans and there was never any discussion about my ability to self-manage - we stated that we were going to self-manage and that was what happened without any fuss! – survey respondent

In light of our analysis, **we recommend that the Policy be adjusted to reflect a presumption that all people have the capacity to self-manage based on a developmental understanding of capacity that includes the willingness and ability to develop their skills and knowledge.**

By identifying key responsibilities and accountabilities associated with self-management in the policy, participants and their representatives will be well positioned to make informed decisions about their Plan Management Options.

As such, it logically follows to **recommend that the Policy notes that in most circumstances, the participant and/or their representative will be the decision maker, making their Plan Management decisions after consulting their LC.**

¹ *Report on WA Individualised Services (WAI’s) and WA NDIS Cockburn-Kwinana Self-Management Project: October 2016.*

4. Responsibilities of Self-Management

4.1 What the Data Says

Respondents made clear that irrespective of how ‘capacity’ decisions might be made, or by whom, the criteria upon which such decisions are based must be very clear. There are significant responsibilities associated with self-managing supports and it can be a complex area.

Fig 2 (below) shows the responses to criteria identified by us in the survey.

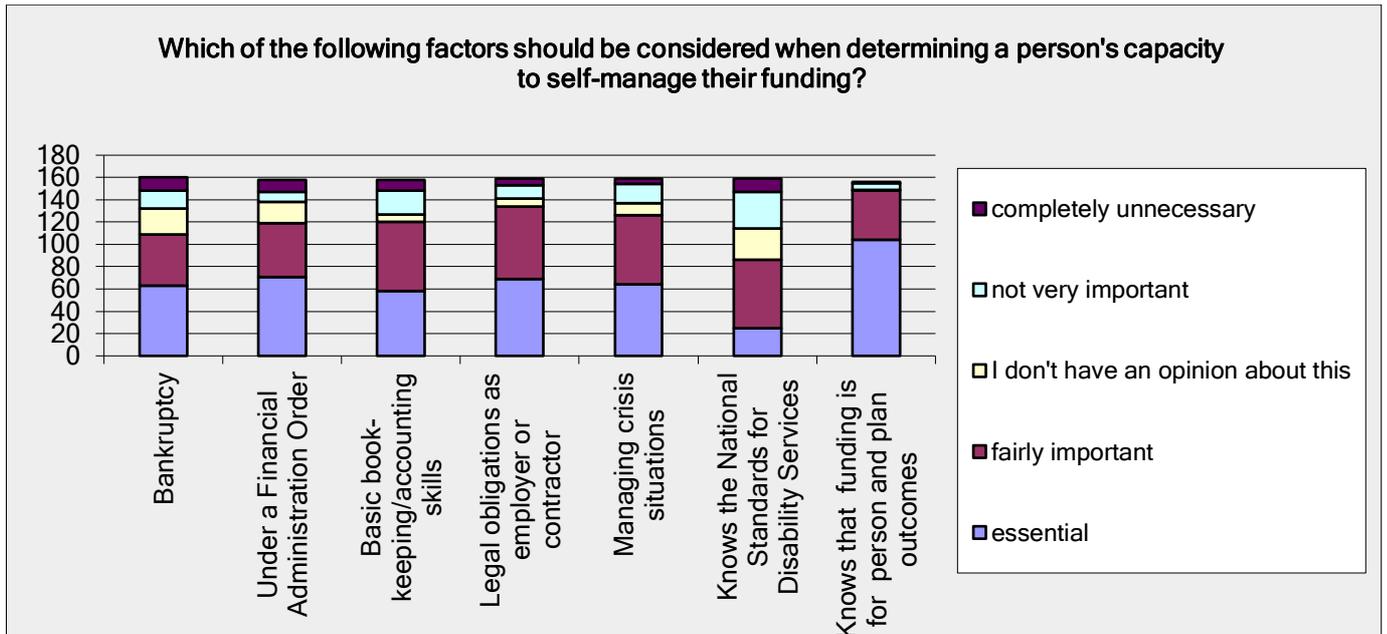


Fig 2: Survey responses to Q2 about factors to consider when determining capacity to self-manage

Other suggested criteria can be summarised as:

- Ability to keep accurate records
- Basic literacy and numeracy skills
- Having the desire to self-manage
- Ability to self-advocate
- Having the time to learn
- Basic knowledge of financial management and reporting requirements
- The ability to source technical advice as needed
- A basic understanding of employment law and a willingness to learn.

Self-management is a brilliant option. I am very fortunate to be able to manage my family members' funding. The results for this person are very high, responsive and progressive. I would not be able to achieve this if the plan was organisationally managed. I want to see other families being offered this and having the training to build their skills. – survey respondent

Independently of these listed items, those consulted suggested numerous additional criteria. As noted above, the most frequent feedback was that self-management skills and knowledge can be learned; so any understanding of ‘capacity to self-manage’ MUST include opportunities for people to develop their skills and knowledge with appropriate support. Some people raised concerns related to safeguarding, noting that providing funds directly to vulnerable individuals potentially increases the risk that they will be exploited.

Others noted that providing clear criteria enables better discussions between Local Coordinators (LCs) and participants, ensuring that participants know what skills, knowledge and abilities they need to have or develop. In this sense, explicit criteria will enable people to make their own decision about self-managing in a more informed way. They will also be an essential foundation in resolving any appeals about capacity to self-manage decisions.

Specific criteria relating to issues like bankruptcy or fraud convictions that potentially could disqualify a person from self-managing were also discussed. General consensus was that the restrictive impact of such criteria should mirror their more general restrictive impact. For example, undischarged bankruptcy lasts for three years and one day from the bankruptcy application date. During this period, some limitations on what undischarged bankrupts can do in terms of self-managing their funding may be appropriate.

We highlight that more nuanced responses were received from *people who are undischarged bankrupts currently self-managing their DSC funding*. Their lived experience and strong feedback was that the fact of being an undischarged bankrupt should not automatically disqualify someone from self-managing their funding, especially since this has not been a universal rule until now. Their recommendation is that any person who is an undischarged bankrupt and wants to self-manage should be required to declare their status to their LC. However, rather than automatically disqualifying them, such a declaration will trigger further information gathering and conversations in which decisions about their suitability to self-manage can be discussed. This will ensure that decisions are well informed and based on individual circumstances. Such decisions might include agreeing to additional safeguards and checks rather than disqualification.

In relation to whether or not a separate bank account should be required, the overwhelming majority of respondents said 'Yes' (83%) although for a good proportion of these it was seen as 'helpful' rather than 'essential'. Of the 14% of people who said 'no', some drew on their self-management and prior financial management experience to argue that it shouldn't be essential.

Several people argued that the participant's funding should cover any costs incurred to operate a separate bank account while others noted that some banks provide fee-free accounts. Some workshop participants noted that people with disability sometimes encounter obstacles to opening accounts in their own name, while others reported that they currently use a dedicated account in a family members' name in the Cockburn-Kwinana Trial Site without any issues.

4.2 Analysis and Discussion

There is no doubt that respondents want key criteria explicitly identified in the policy. We agree that this is desirable and **recommend that the criteria be listed in the policy as “responsibilities associated with self-management”**. The feedback was also unequivocal in suggesting that the criteria not involve unnecessary paperwork or bureaucracy and be expressed

clearly and simply.

Analysis of the data reveals that with few exceptions, the feedback relating to 'capacity to self-manage' does not identify or discuss issues relating to safeguards and risks. This is understandable given that feedback on this topic was canvassed as a separate topic (see Section 7). For reasons that will become evident in our discussion in Section 7, we have added some points related to this to the list below.

Accordingly, the recommendation from the consultation is that the following responsibilities associated with self-management form part of a one-page checklist that people choosing to self-manage complete when developing their plan. We note that this includes an implicit option for people to engage someone to provide these services on their behalf rather than develop all of these skills themselves:

- Manage support services in ways that meet the National Standards for Disability Services
- Manage support arrangements such that the participant is safe from risks of abuse, neglect and/or being subject to restrictive practices
- Has a basic knowledge of financial management and reporting requirements
- Able to keep accurate and up-to-date records
- Submit funding acquittal reports on time (quarterly)
- Has a desire to successfully self-manage their supports in pursuit of the goals and outcomes identified in their plan
- Self-advocate and/or enlist the support of other advocates as required
- Will devote time to developing skills and learning more about self-management
- Is able to source technical and specialist advice as needed
- Knows how to recruit and manage staff
- Has a basic understanding of employment law and are committed to maintaining current knowledge as laws change.

As a further risk mitigation measure, the findings in the consultations supported a checklist which includes opportunities for people to declare:

- that they are aware of their responsibilities under self-management;
- that they have read and understood some specific preliminary documents (such as the National Standards);
- if they are an undischarged bankrupt;
- if they have ever been convicted of fraud (or similar offences);
- they already have, or will open, a dedicated bank account to manage NDIS funds in advance;
- that they have the capacity and skills to undertake what they are committing to do; and/or
- that any additional development opportunities and/or resources they require to build their capacity are included in their WA NDIS Plan.

Many of these responsibilities are explained in the current version of the WA NDIS Self-Management Guide. We **recommend that the WA NDIS Self-**

Management Guide be thoroughly reviewed and revised and provided to all participants who request to self-manage.

It seems prudent that self-managers have a dedicated bank account for WA NDIS funding. It also seems reasonable that the participant's funding should cover any reasonable costs of fees and charges incurred. A separate account provides a useful safeguard for both individuals and DSC and greatly improves the simplicity and efficiency of auditing to the benefit of all concerned.

5. Management Plan

5.1 What the Data Says

As with the question of 'capacity to self-manage' the survey questions about the Management Plan seem to suggest there is broad agreement to including this in the policy, as Figures 3 and 4 demonstrate.

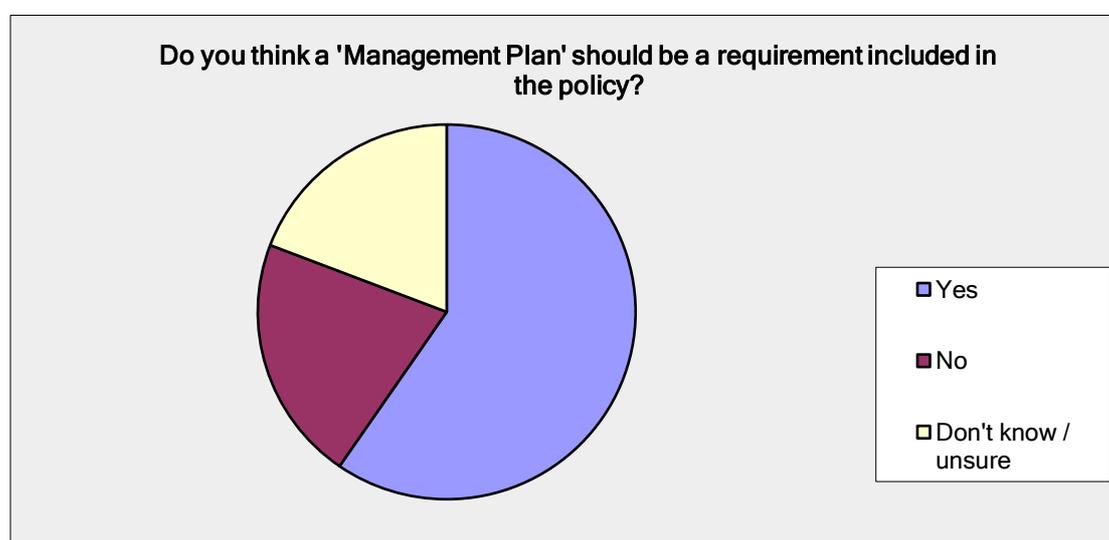


Fig 3: 60% of survey respondents to this question indicated that this should be a requirement

However, the commentary and workshop feedback highlight reservations about a 'Management Plan' being a policy-driven requirement, even if people answered 'yes' to the question shown in Figure 3. This feedback reveals a strong sentiment that this should not be required and does not add value:

- *Just more paperwork that is unnecessary – we have enough of that*
- *I don't think a 'management plan' is needed*
- *Just adding more time, stress & paperwork*
- *Sounds like more paperwork, and more work for the poor LACs*
- *Honestly, we have enough to do without adding more forms and meetings to our lives!*

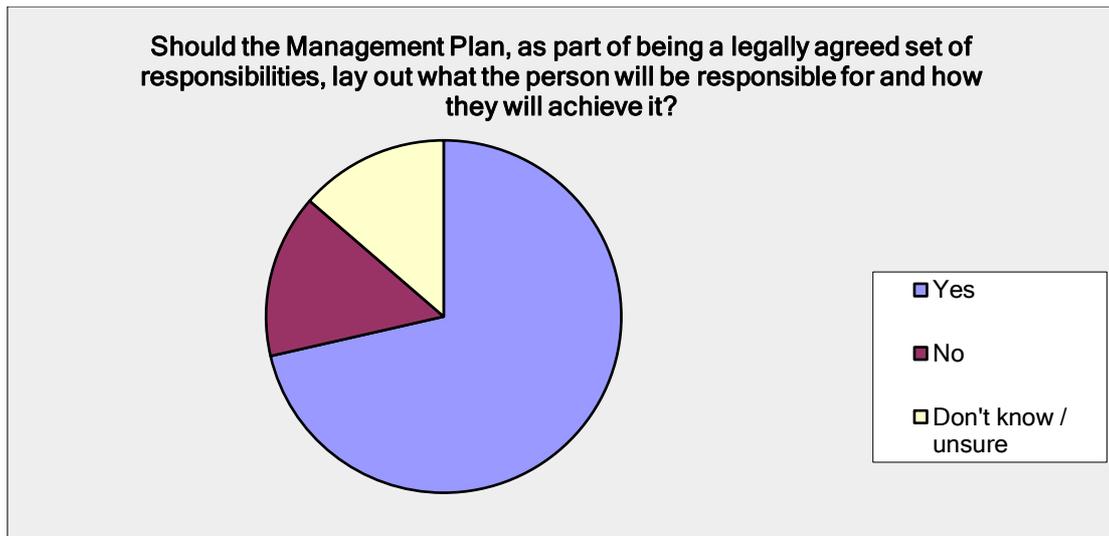


Fig 4: 70 % of survey respondents indicated agreement with this question when given yes/no response options

Parallel with this sentiment, respondents want clarity about their self-management rights and responsibilities in simple language, and an in-built flexibility to adjust their arrangement in light of changes that happen over time:

- *Management plans are confusing and restrain adaptability as intended by the NDIS*
- *There should be a set of responsibilities laid out, BUT things change from time to time so there needs to be flexibility within the responsibilities*
- *Simplified risks and obligations*
- *People should be fully aware of their legal obligations and liability for elements of self-management of NDIS funding*
- *It must be simple - checklists and examples not complexly worded statements.*

In summarising all of the feedback, the following issues were identified.

(1) A concern that including a Management Plan as an essential requirement creates additional and avoidable paperwork for people who want to self-manage and for LCs' workloads.

(2) Many respondents have successfully self- and share-managed their funding without a Management Plan until now, and were adamant that adding this as a requirement is unjustified and unnecessary (so not evidence-based).

(3) A number of people noted that the NDIS is premised on 'choice and control' and therefore greater flexibility. Having to develop and adhere to a 'Management Plan' alongside a participant's individual plan will – in most circumstances – result in decreased flexibility and increased complexity in their lives. This will have the effect of making self-management less attractive so reducing the number of people choosing this option (with a commensurate increase in Scheme costs and decrease in participant satisfaction).

(4) Many people think they have enough ‘plans’ in their lives already, so adding another one is burdensome.

(5) It may not be realistic to think that all LCs will have the skills and knowledge required to determine if a Management Plan is adequate and appropriate unless they have experience like running a small business. Similarly, is it realistic to expect that they will all have the skills to assist people to develop their capacity? The general sense among workshop discussions was ‘this is unlikely’.

(6) The Management Plan definitely should not be used to determine if a person has the capacity to self-manage. It may, however, be appropriate and helpful to assist some people to develop their capacity as a self-manager. The Management Plan should be about ‘capability’ – adopting a supportive approach that enables people to self-manage. It should therefore be seen as ‘capacity building’ with funding for this (mentoring program, peer-to-peer support) included in the participant’s plan.

(7) Among people currently self-managing their supports, many opined that the current approach in which some initial materials and guidelines are provided is sufficient. Regardless, whatever resources are provided need to be simple and clear. They need to outline the rights, responsibilities, obligations and risks associated with self-managing in simple language.

5.2 Analysis and Discussion

Based on the feedback provided in relation to this topic and the foregoing discussion of ‘capacity’, **we recommend that any mention of the Management Plan be deleted from the policy**. As outlined in Section 3 and 4 of this report, the policy needs to explicitly include a positively framed, developmental understanding of capacity. The use of a positively framed “responsibilities associated with self-management” checklist (see Section 4) will achieve the policy’s intent while supporting participants’ autonomy and reducing the administrative burden on both self-managers and LCs.

6. Supports

6.1 What the Data Says

Quantitative responses to the survey questions about support to help people self-manage indicated strong support for the LC providing “information and guidance to a person . . . to build their understanding, skills and capacity in relation to their responsibilities under self-management” (Q8, 85% of respondents). There was also a strong positive response to question 9 that asked about information, guidance and support that would be beneficial.

However, 52 respondents provided comments to Q8 and 121 commented on Q9 and again, the qualitative commentary significantly alters the message associated with the strong positive quantitative responses.

In relation to whether LCs should provide this support as suggested in the draft policy, the comments affirm that such support should be available, but

the majority cast doubt on, or are ambiguous about LCs solely undertaking this function. Examples of these comments include:

- *There is a lot to understand and the LC may not have the required depth of knowledge*
- *There needs to be an independent process available where the LC is not tied to DSC/NDIA and its executive*
- *I don't believe all the LCs will have the expertise to be advising on this*
- *Appropriate to support people to have the capacity to self-manage*
- *Only if they [LCs] deliver factual consistent information*
- *You should be able to choose who this person is [providing support]*
- *The information I have been provided in not practical or user friendly. A payroll service would be better*

Despite the intent for LC's to provide 'information and guidance' only, many people described LCs as currently providing 'advice', something that goes beyond their role and potentially creates heightened risks. Several others noted that many mainstream sources of relevant information, guidance and advice are available (e.g. small business support hubs), so DSC should not replicate these when it is not DSC's core business or area of expertise.

In short, the data confirms that support, information, guidance and/or advice is needed and valued, but not necessarily from LCs. Furthermore, the information, guidance and support most needed relates to:

- workers compensation;
- taxation;
- recruiting your own supports;
- superannuation;
- planning;
- designing services;
- dispute resolution;
- supervising staff;
- the legal aspects of being an employer; and
- safeguarding.

Self-management makes sense: first and foremost for the person it is supporting in many cases and [secondly] for the practical cost savings to the country – survey respondent

While these areas don't need to be identified in the Policy, the pricing framework may need to include full or partial funding for all/some of these.

Workshop discussions generated additional suggestions that include access to the WA NDIS portal (similarly to the access self-managers have in the NDIA model), training and support around using the portal, training and support to understand the WA NDIS funding clusters and structure, and access to information about deregistered providers and/or banned individuals (see Section 7 for further discussion of this issue). Participants reiterated the need for information to be readily available and written in simple, easy to understand ways.

In all three workshops, participants identified the value of having a relationship with a "go to" support person to assist them with problem solving, developing their capacity and ensuring they were complying with requirements. While DSC seems to expect that this is part of the LC's role, participants in all three

workshops expressed reservations about LCs doing this – from both workload and deep knowledge perspectives. Some people also suggested that there should be a choice about where they go to for this support, especially since the NDIS aims to increase autonomy, choice and control.

6.2 Analysis and Discussion

The workshop discussions emphasised that people want to ‘do the right thing’ and are willing to be accountable for how they manage their individualised funding. They also want to maximise their flexibility, choices and control over their arrangements. Most participants are also aware that self-managing can be complex and that having access to skilled and credible support when needed is essential to ensuring that self-managers can succeed.

It is very clear that many people hold reservations about LCs potentially having a critical support role for self-managers. It seems unrealistic to expect that all LCs will have the requisite knowledge and skills to provide people with the level of support they might require, particularly in light of other duties and responsibilities associated with their roles.

7. Safeguarding

7.1 What the Data Says

People with disability and family members see safeguarding as a critically important area. Despite this, the consultation process did not identify how this can best be addressed at a policy level using the self-management Plan Management Option. Some recurring points did emerge.

More than 50% of survey respondents want training about what is meant by the term ‘abuse and neglect’ and more than 75% of respondents need to know who to contact if they know or suspect that abuse and/or neglect is happening. They also want information about the process once an initial complaint is made (Fig 5). This suggests that some clear and easily accessible procedures for people to follow will be helpful, though not necessarily preventative.

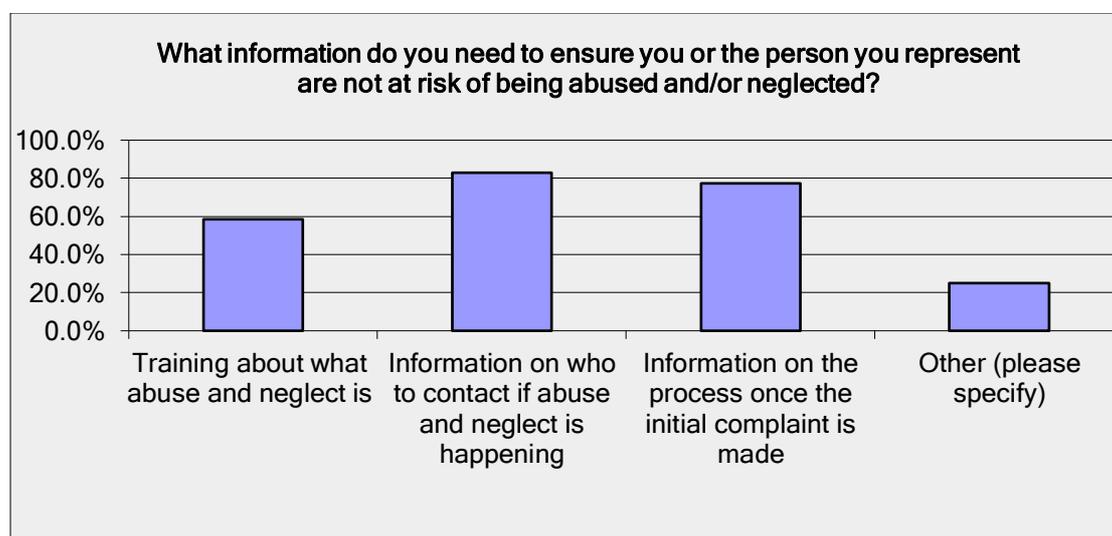


Fig 5: Information needed to diminish risk of abuse and neglect in self-management arrangements

Figure 6 shows survey responses to some suggested limitations that could potentially reduce the risk of participants experiencing abuse and neglect.



Fig 6: Possible restrictions pertaining to purchased services

While compliance with the National Standards for Disability Services was seen as useful, workshop participants were reluctant to recommend that compliance with these be forced onto people who self-manage. A number of participants who currently self-manage have personally experienced or witnessed what they describe as abuse and neglect in services from registered service providers who are required to comply with the National Standards. They noted that being assessed as complying with the Standards does not necessarily provide the safeguards that people might be looking for. Nonetheless, it was clear people felt that the National Standards are important and that the current Policy statement that “service arrangements reflect the National Standards for Disability Services” (Policy Section 6.4) should be retained.

There was general consensus that self-managers need to be able to identify neglect and abuse issues, their importance and the potential implications. However, there wasn't a clear consensus on how best to achieve, oversee or regulate this. Some respondents consider it to be something they need to manage and address themselves, while others proposed solutions that included LCs visiting to check practices, current disability service monitoring approaches being extended to include self-managed arrangements, and establishing a hotline for reporting suspected abuse and neglect.

Beyond these points, little additional commentary was received. Things like requiring workers to have a National Police Certificate were highlighted and discussed. These are widely acknowledged as broadly useful screening measures but of limited value as being truly preventative. For example, they don't identify people who have been dismissed from previous employment for abuse and neglect related reasons and who were not prosecuted.

Workshop participants discussed the idea of DSC creating, holding and making publicly available, lists of service providers that have been de-registered (including reasons why). Some thought that a similar list of individuals who have previously worked in carer/support roles and been dismissed or banned from the sector for acts of gross misconduct that amount to abuse and neglect, or otherwise failing to uphold a person's safety and wellbeing should also be created and made available.

7.2 Analysis and Discussion

We note that towards the end of the consultation period, the NDIS Quality and Safeguarding Framework was publically released. We consider this to be of particular importance to developing this policy for a number of reasons, despite it not directly reflecting the input to our consultation process. WA has already signed up to this Framework, meaning it will provide significant guidance to DSC in developing Quality and Safeguarding elements of the WA NDIS including in finalising this aspect of the Self-Management Policy.

Without yet having had an opportunity to study the Framework in detail, it is apparent that it addresses many of the concerns expressed in the consultation.

“The Framework consists of measures targeted at individuals, the workforce and providers within developmental, preventative and corrective domains. Developmental measures help to strengthen the capability of people with disability, disability workers and suppliers of supports under the NDIS. The preventative and corrective measures help to ensure appropriate responses to issues that arise, as well as identifying opportunities to prevent them in future, either through a regulatory response, or through education and capacity building”

(NDIS Quality and Safeguarding Framework Fact Sheet).

The developmental components of the Framework align with the very clear feedback about the need to adopt a developmental approach to understanding and operationalising ‘capacity to self-manage’.

Section 2.2.3 (pp36ff) specifically addresses preventative Quality and Safeguarding issues relating to participants who self-manage their funding. Section 3.2.1 outlines an approach to screening workers that will, among other things, contribute to establishing a database of people who are banned from working in the sector. This will satisfactorily address one of the suggestions raised in the consultation and strengthen the preventative safeguards around people with disability including those who self-manage.

Section 2.3.3 (pp53ff) describes the role of ‘community visitors’, a role that corresponds to feedback suggesting that LCs could visit, or current service monitoring approaches could be extended to include self-managed arrangements. The role of community visitors seems to be more common in

other jurisdictions and on face value seems to be a potentially useful addition that will strengthen Safeguarding arrangements in the WA NDIS.

We also reference earlier safeguarding work undertaken within the NDIS framework by Marita Walker, Kate Fulton and Bruce Bonyhady² in which they note that:

“safeguarding is more than child and adult protection, its primary function is concerned with the promotion of the welfare of the person - supporting them to have a good quality of life, to be an active and equal citizen, to reach their potential AND to promote their safety” (p2).

Building on work by Kendrick, Williams and others, they identify four domains of capital that exist for all citizens – personal capital, knowledge capital, social capital and material capital. They examine the importance of recognising and developing all of these as integral to positively safeguarding vulnerable individuals. While it is apparent that this document has influenced the development of the NDIS Quality and Safeguarding Framework, it is worth reading to fully appreciate some of the thinking behind the Framework.

The investment nationally in the Peer to Peer connect groups have been highly successful and needs to also be acknowledged. This initiative is supported by JFA Purple Orange, who is the National Support Agency for the Disability Support Organisation (DSO) Capacity Building Initiative

It is important to acknowledge the significant, positive impact of the Positive Behaviour Support work that Mike Cabbage, Jacki Hollick and others at DSC have done collaboratively with families, individuals and service providers across WA over the past ten years ([http://www.ideaswa.net/upload/editor/files/positive_stories_-_final_report_\(3\).pdf](http://www.ideaswa.net/upload/editor/files/positive_stories_-_final_report_(3).pdf)). In this context, this initiative highlights the broader social, environmental and personal contexts in which behaviours of concern emerge and provides tangible, positive alternatives for understanding them and responding to them. It also illuminates our understanding of restrictive practices and the role they have played (and in some situations still do play) in services provided to people with disability.

An important component of the Positive Behaviour Support work has involved developing family leadership and continually enhancing peer support opportunities (Is There A Better Way?; Side-by-Side). Family members speak effusively of the value of this peer support in often difficult and challenging circumstances. We simply note here, that this corresponds with feedback we received about the perceived value of peer support for self-managers and the desire to ensure this is an option for those who choose self-management in the WA NDIS.

Finally, we reference the growing body of research and evaluation work in this

² Walker, M., K. Fulton and B. Bonyhady. 2013. *A Personalised Approach to Safeguards in the NDIS*.

area being led by Dr Sally Robinson at Southern Cross University (https://works.bepress.com/sally_robinson/). Dr Robinson's work is of particular relevance and value to this aspect of the policy (and indeed to all considerations of abuse, neglect and safeguarding) because she works closely and creatively with very vulnerable people with disability. Much of her work to date has included children and young adults with intellectual disability giving firsthand accounts of their subjective and objective experiences and understanding of abuse, neglect and safety. There is little if any systematic work of equivalent nature being done in WA.

Accordingly, **the consultation identified that the “Safeguarding under self-management” section of the draft policy will need substantial development in the short to medium term.** In the meantime, it is expedient to release the policy so we **recommend two modifications to the current draft.** The last sentence of paragraph 3 be adjusted to read: **The Local Coordinator should also be contacted *at the earliest opportunity* for support and advice.**

The last paragraph of this section be adjusted to read: **Approval for self-management may be withdrawn or suspended if concerns or allegations arise in relation to *the person's safety and welfare, their capacity (and/or representative's capacity) to self-manage, and/or the quality of the services being provided to the person.***

8. Flexibility

8.1 What the Data Says

'Flexibility' is an important recurring theme for people with disability and their family members/carers, many of whom view self-management as a means of maximising their choice and control, and therefore the flexibility of their support arrangements. As the following quotes demonstrate (there are many more like these) there is a strong desire that the policy enables such flexibility and does not stifle it:

- *There needs to be flexibility to change the plan when needed, rather than at review time*
- *The benefit of self-management is flexibility to choose and arrange your own supports*
- *Important to keep it flexible and not too restrictive or requiring a lot of paperwork otherwise it will make it too complicated to self manage*
- *Flexibility should be the goal here*
- *The system should have some flexibility built into it to allow for exceptional circumstances*

One survey respondent provided an insightful, practical example of the need for flexibility:

- *Sometimes special things come up. e.g. our son has just been selected to represent WA for integrated cricket. This wasn't in his plan, but is a great opportunity heavily sponsored by the WACA. But he still needed money for travel in order to participate. I was able to use some of the*

'contingency' money to cover it. I think there needs to be allowance for this type of thing.

Others noted that changes to a person's health status or a medical emergency can arise with little notice and require a rapid adaptation of planned supports. They noted that such situations are inherently stressful and personally challenging for the person, on several levels. Requiring people to engage with a bureaucratic process to adapt their support services at such times will significantly add to their stress and can be avoided.

It is, therefore, desirable that self-management should be simple, straightforward and free of bureaucratic entanglements where possible. Respondents were clear that they don't want their lives complicated by avoidable requirements that are of little or no value to them.

Further comments identify that the very specific contexts and circumstances of individual lives are the things that often inform why flexibility is so important to people. These include things such as locations (e.g. regional, remote or outer suburban versus sub/urban); travel needs; complex medical needs; ability to safely perform specialised tasks; and supporting people with complex communication and/or behaviour support needs.

These examples are the lenses through which people view their needs for support services, and at least partly explain why the WA NDIS needs to be a responsive model.

8.2 Analysis and Discussion

With the NDIS model built around plans, goals and outcomes, people were keen to maintain flexibility around *how* these are achieved, despite the strategies that might be detailed in a person's Plan. The reality for every person (not just those with disabilities) who makes plans, sets goals and achieves outcomes is that the path from a plan to a goal or outcome is never a straight line. Circumstances change, opportunities spontaneously arise and obstacles are encountered that need to be overcome.

Accordingly, the NDIS must build flexibility to adapt *how* people pursue their goals and achieve their outcomes into its operating model. The NDIS Quality and Safeguarding Framework makes clear that self-managing "gives people with choice and control and helps improve their outcomes. It is also intended to provide greater flexibility . . ." ³

It is preferable that this flexibility be available without requiring a Plan review or other bureaucratic processes, all of which build avoidable administrative costs into the Scheme. As one respondent put it '*ease of review is extremely important*'. We note that this need for flexibility applies more broadly than to self-managers. However, given that the feedback we received has been

³ NDIS Quality and Safeguarding Framework. 2016. P36.

provided in the context of the draft self-management policy, we believe it is important that the need for flexibility is reflected in this policy.

Accordingly, **we recommend that the following be included as a Principle in Section 4 of the Self-Management Policy: WA NDIS is committed to ensuring that people who choose to self-manage their supports have significant flexibility over their arrangement, consistent with the goals, strategies and services identified in their NDIS Plan.**

9. Pricing Clusters and Framework

9.1 What the Data Says

In the first survey, we asked: “In relation to the Pricing Framework, what do you think is the most critical thing you would want included, and why?” Three themes emerge in the responses.

1. Simplicity and flexibility;
2. Pricing needs to be realistic to attract and retain suitably qualified and motivated support staff; and
3. Adopt the same pricing bands as apply for service providers.

Before examining data from the second survey which focused exclusively on the Draft Pricing Clusters and Framework, we note that if DSC was to adopt point 3, it would be a substantial step towards achieving point 1, and would provide an objective benchmark for countering complaints and disputes about point 2. We will return to this suggestion shortly.

Analysis of the 150 responses to the second survey confirms the importance of these themes. Examples of comments include:

- *Set an hourly rate, determine hours of support = Funding. Consumer then has control of funding to manage it in whatever form best suits their needs*
- *People who self manage do so to enable a more flexible, appropriate and quickly responsive support for a person to make life as 'normal' as possible. It should not be looked upon as a cheap cost cutting option*
- *Outrageously inappropriate spending should be restricted. Yet how you go about achieving the goals set out in the plan must be flexible to suit the individual needs of the family/person*
- *There needs to be flexibility with what you can purchase as situations can change very quickly due to illness, growth of the person, etc.*
- *Flexibility – situations change in an instant and constantly*

The responses also suggest that there is considerable variation in the levels of knowledge and/or experience of key aspects of self-management and what it involves. This is unsurprising to WAI S and PWDWA. The recent project WAI S conducted with WA NDIS in the Cockburn-Kwinana Trial Site reports a similar finding:

For the most part, when WAI S met with individuals and families, it was apparent that they “did not know what they did not know”. As such, individuals engaging with WAI S did not necessarily

*have particular questions in mind to ask in relation to them self-managing and directly engaging their own supports*⁴. (p3)

Our considerable engagement with people involved in self- and shared-management also reflects this phenomenon. The wide variation in the data means that it does not present a consistent voice.

For example, in response to Q1 (about the proposed \$30-41/hr price range applying to daily living, well-being and having a break), 53% agreed that the range was adequate while 40% disagreed. In the associated commentary, suggested prices ranged from a low of \$15/hr to a high of \$75/hr. Between these extremes, suggestions tended to fall in a mid range at around \$40-50.

Some people were clear that the 'price' in the Framework does not equate to support workers' rate of pay, while others were not clear on this point. We were surprised when some workshop participants reported that under their current WA NDIS arrangements they are 'required' by WA NDIS to pay the full price to support workers as a fixed rate irrespective of time of day or week.

More helpfully, several factors that should influence the pricing framework were suggested, including:

- Penalty rate considerations and days/hours of work;
- Support workers' levels of skill and prior experience;
- Training new support workers with specific skills and knowledge;
- Annual leave and sick leave provisions;
- Covering staff on leave;
- A price *range* may result in WA NDIS typically approving plans funded at the low end of the range;
- A price range may contribute to driving up market pay rates for SWs;
- Covering travel costs when supporting a person who cannot drive; and
- Support workers being paid at award rates with penalty loading where applicable: *Award rates should be governing WA NDIS not vice versa.*

Consistent with the last comment, numerous respondents suggested that the price range should be benchmarked against at least one of three possible external sources: the relevant Industrial Award; the WA NDIS prices for service providers; or the Federal NDIS prices. In our opinion, there is much merit in these suggestions despite this not being a majority perspective.

- *Allowing self managed funding rates to be on par with organisation managed rates would be fantastic*
- *To ensure that PWD get EXACTLY the same as the rest of Australia then we should be using the Federal NDIS Pricing Framework.*
- *I just feel WA is making it more complicated than it should be. Life has enough challenges when you factor in disability; we shouldn't be making it harder.*
- *We SHOULD NOT be creating our own pricing framework when one has already been created for the NDIS.*

⁴ *Report on WA Individualised Services (WAiS) and WA NDIS Cockburn-Kwinana Self-Management Project: October 2016*

- *The NDIS pricing framework should be used in WA so that people with disabilities in WA receive exactly the same support as people with disabilities in the rest of Australia.*
- *We must be able to pay award rates and penalties!*

Responses to question 11 reveal a strong consensus that the self-managing pricing framework should be the same as the pricing framework for service providers if it is to be realistic. A significant number of respondents also suggested that this could include an amount that pays self-managers for the work they are doing, work they perceive to be similar to the administrative and 'backroom' work done by service providers. Workshop attendees noted the time and effort involved in self-managing and questioned why such a strong, systemic disincentive to self-managing should exist.

9.2 Analysis and Discussion

We note that the proposed pricing framework includes provision for self-managers to identify their needs for additional services that will help them succeed when self-managing. These include services such as book-keeping, accounting, HR advice, software and staff training. The cost and nature of some of these services need to be known in advance in order to have them funded in a Plan, while others can be obtained by quote.

For service providers, the pricing framework rolls these elements (along with penalty rates, superannuation, workers compensation etc.) into the price band, making it (among other things) much simpler and more flexible than the self-management pricing framework. Given the high importance that respondents placed on flexibility and simplicity when it comes to pricing, this is quite ironic. The issue of respondents promoting the idea of the pricing framework being consistent with the National Pricing guide is something that needs to be noted.

Accordingly, the consultations identify and **it is recommended that the self-management pricing clusters and framework be replaced by using the service provider pricing clusters and framework**. As well as giving participants and their representatives a more simplified system, it will better enable them to maximise the flexibility of their support arrangements. Costs such as superannuation provisions will be included in the price rather than added as a separate line item. There are several additional reasons why we so strongly recommend that this is a better approach to pricing.

Firstly, there is considerable administrative work and costs (direct and indirect) associated with people or their representatives getting support arrangements in place. This administration involves the person and/or their representative, the LC, other DSC staff and quite frequently, some service provider staff. It includes writing plans that include goals and strategies, getting quotes from providers in relation to any practical administrative or management supports (as noted in the Pricing Framework – these are in addition to quotes for services such as therapy), bringing these to the LC,

having meetings and discussions (both between the LC and participant and between the LC and their line manager), and going through approval processes. Review meetings and processes when circumstances change are an additional impost! It needs to be acknowledged that this administrative effort is significantly counterproductive and burdensome to the planning process.

Secondly, and in contrast, if funding for the participant's planned goals and strategies is costed at the same rate as providers, the person is then able to choose what other supports they want or need within a fixed 'reasonable and necessary' budget while retaining the flexibility to be responsive as things change for them.

Thirdly, this price range potentially enables them to pay support workers a slightly higher rate of pay than providers in order to compete with providers who offer benefits such as salary packaging to attract and retain staff.

Fourthly, by setting the pricing framework the same as providers, it is possible for people to recruit and retain quality staff, provide opportunities for training (most of which cannot be known ahead of developing a plan), AND get the support they may need for the administrative tasks. This is not about a 'more bang for buck'. It is about self-managing supports being sustainable and reducing the administrative processes for people.

Fifthly, this approach will reduce Scheme costs by significantly reducing the administrative processes for DSC staff, especially for LCs and their Managers. In the draft Pricing Framework, this cost is largely hidden from consideration. The potential cost saving in avoided Plan reviews alone is likely to be significant, noting that this concurrently delivers the desired outcome of increased flexibility and control to people and their representatives. It is important to note that specific capacity building activities (as opposed to administrative tasks) should be funded separately, as per NDIA currently.

A final benefit to flow from making this change is that it is likely to contribute to re-establishing trust between DSC and people with disability and family members who are currently feeling quite disenfranchised. At the same time as DSC is about to seriously begin 'co-developing' the WA NDIS details, many people with disability are criticising DSC for not engaging with them and not listening to what they have to say.

With respect to the need to get quotes for specialist and therapy services, there was a divided sentiment, with responses fairly evenly divided between yes, no and unsure. Several people expressed concerns about service providers inflating prices when they perceive or know that the service is being funded through the NDIS. This is consistent with someone's recently reported experience on the NDIS in WA Peer Support Facebook group when they were provided with two quotes for a service – a higher rate with NDIS funding and a lower if NDIS funding was not available. Appendix 2 provides a short snap shot of other current experiences of the WA NDIS.

10. Conclusion

The consultation process succeeded in engaging well over 150 interested people over the major holiday period. The feedback provided sometimes pointed consistently in particular directions. The high value that people and their representatives place on 'flexibility' is one such direction. They clearly do not want self-management to involve more bureaucratic processes and engagement than is absolutely necessary.

Respondents were equally clear that when it comes to determining 'capacity to self-manage' this should be understood as a developmental term and that people and their representatives should primarily be the decision makers in all but a few exceptional cases. In making their decisions, people and representatives should have adequate, simplified and clear information available to them and should be able to draw upon supports that assist them to develop and maintain their capacity to self-manage should they wish to do so. We recommended that a short checklist be developed to assist both the person making the decision and the LC to be clear about the responsibilities associated with self-management. This will also assist the person to consider how they will fulfil their responsibilities in each of the designated areas.

Safeguarding was noted as an important area, although the feedback provided varied greatly in terms of providing specific suggestions that will increase the safeguards around vulnerable people with disability. The recent release of the NDIS Quality and Safeguarding Framework is of greater significance and will have an impact on this and other WA NDIS policies. Significant co-development work will be needed on this front.

The Pricing Clusters and Framework attracted significant feedback, with many people most concerned about the price range and arrangements pertaining to core supports such as daily living, well-being and having a break. Our strongest recommendation is that WA NDIS apply the Service Providers' Pricing Clusters and Framework to self-management. Several compelling reasons for this recommendation were detailed.

11. Recommendations

The following recommendations emerge from the consultation feedback and our analysis of the data.

1. Reporting on this consultation to stakeholders

DSC provide clear, direct and timely public feedback identifying and explaining how the data in this report has impacted on the policy and the pricing clusters and framework. Such reporting may include releasing this report into the public domain, releasing a summary of this report including all recommendations, and/or providing feedback on how each recommendation was considered by DSC and in what ways these have influenced the final policy (or not).

2. Clarify the status of Shared Management with respect to this policy

Adjust the Policy Statement (Policy Section 2) to clarify that the Plan Management Option known as Shared Management is a version of 'Organisationally Managed Plan Management'. As such, this policy does not apply to shared management.

3. Include a developmental definition of 'capacity' in the Policy

Define capacity in Section 5 of the Policy as: Capacity refers to having the ability, willingness and time to self-manage and/or develop and maintain the knowledge and skills needed to self-manage given appropriate support and opportunity.

4. Presume that everyone has the capacity to self-manage

Adjust the policy to reflect a presumption that all people have the capacity to self-manage based on a developmental understanding of capacity that includes the willingness and ability to develop their skills and knowledge.

5. The participant and/or their representative decides

Adjust the Policy to note that in most circumstances, the participant and/or their representative will be the decision maker, making their Plan Management decisions after consulting their Local Coordinator.

6. Identify decision criteria as 'responsibilities associated with self-management'

Adjust the policy so that the criteria people will use to decide whether or not to self-manage are identified and discussed as 'responsibilities associated with self-management'. These can be reflected in the policy as a checklist running to no more than a single A4 page.

7. Revise the WA NDIS Self-Management Guide

Thoroughly review and revise the WA NDIS Self-Management Guide and provide a copy to all people who request to self-manage.

8. Delete the Management Plan from the Policy

Delete all mention of the Management Plan from the policy. This is to be replaced by the 'responsibilities associated with self-management' and its associated checklist (Recommendation 6).

9. Substantial work required regarding Quality and Safeguarding

In light of the recent release of the NDIS Quality and Safeguarding Framework, the "Safeguarding under self-management" section of the draft policy will need substantial development in the short to medium term.

10. Adjust the Safeguarding under self-management in the interim

In order to 'finalise' and release this policy in a timely way, we recommend making two adjustments to wording in Section 6.4 of the draft policy.

- i. The last sentence of paragraph 3 be adjusted to read: The Local Coordinator should also be contacted *at the earliest opportunity* for support and advice.
- ii. The last paragraph of this section be adjusted to read: Approval for self-management may be withdrawn or suspended if concerns or allegations arise in relation to *the person's safety and welfare, their capacity (and/or representative's capacity) to self-manage, and/or the quality of the services being provided to the person.* (italics added)

11. Explicitly prioritise 'flexibility' in the Principles

Include the following as a Principle in Section 4 of the Policy: WA NDIS is committed to ensuring that people who choose to self-manage their supports have significant flexibility over their arrangement, consistent with the goals, strategies and services identified in their NDIS Plan.

12. Pricing Clusters and Framework

Replace the proposed self-management pricing clusters and framework with the equivalent service provider pricing clusters and frameworks for each geographic region.

Appendix 1

This consultation explicitly operated at the “Involve” level of IAP2’s Public Participation Spectrum. Both the ‘goal’ and the ‘promise’ associated with the Involve level were explained to workshop participants.

IAP2’S PUBLIC PARTICIPATION SPECTRUM



The IAP2 Federation has developed the Spectrum to help groups define the public’s role in any public participation process. The IAP2 Spectrum is quickly becoming an international standard.

		INCREASING IMPACT ON THE DECISION				
		INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
PUBLIC PARTICIPATION GOAL		To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision making in the hands of the public.
	PROMISE TO THE PUBLIC	We will keep you informed.	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision. We will seek your feedback on drafts and proposals.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will work together with you to formulate solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.

Used with permission. Accessed:

https://c.ymcdn.com/sites/www.iap2.org/resource/resmgr/Foundations_Course/IAP2_P2_Spectrum.pdf?hhSearchTerms=%22spectrum%22

Appendix 2

Some comments about current WA NDIS experiences

Workshop participants and survey respondents who are currently self-managing in WA NDIS trial sites spoke of several frustrations with the way that their self-managements are currently organised.

These include not having 'live' or up-to-date information about the funds expended and/or acquitted. In several cases, this has led to disputes with DSC about what has been spent and acquitted, adding further tasks to the 'job' of self-managing. They suggested that giving self-managers access to the WA NDIS portal would overcome this issue because disputed amounts could be resolved in a more timely way rather than at the end of the Plan period.

- *Currently, self-managers are very disadvantaged financially and time-wise, and very unsupported. We are held accountable by DSC for any mistakes that we make, as well as for mistakes made by DSC staff processing our acquittals. We have no access to the portal, so cannot track our funding and expenditure in the same way that an agency can. Our only advantage is in having actual choice and control over who support staff are, and what they do. But the cost of this choice is very high, exhausting and financially draining. These issues must be rectified – workshop participant.*

Another workshop participant noted that the proportion of people self-managing in the Lower South West Trial Site had decreased. Their anecdotal evidence was that this is due to inadequate support.