

NDS Feedback on the Day Services Handbook May 2012

NDS acknowledges and welcomes the opportunity to provide feedback on the draft Day Services Handbook. NDS has sought feedback from members specifically about the Handbook, as well as through service reorientation member meetings.

General Comments re the Day Services Handbook

NDS supports the development of an accessible handbook for users of day services, to help people navigate the system and understand the rules and opportunities.

Most members report that the Handbook is generally quite clear, although there is scope to reduce the length of the sentences, and replace formal words with simpler words. It is requested that the language 'Day Services users' be replaced with 'users of day services'. It is also important that the terms 'day services' and 'day services provider' are not used interchangeably, but their use reflects the definitions in the back of the Handbook.

It has been suggested that the Handbook could further expand on how people with disabilities can use their funds to access non-disability specific services. NDS members have indicated that they would like something quite explicit on this issue, considering the policy commitment to people with disabilities being part of their communities.

Comments re Clauses in the Handbook

Page 7, Sec 1.4 Different Funding – Same Rules

People who use an ISP to attend a Day Service will have either have:

- *an ISP allocated through the Disability Supports Register, or*
- *an ISP allocated as part of the changes to Day Services funding on 1 January 2010 (see Section 2.1)*

Comment:

At present members report that the management and processes for these two ways of issuing an ISP can be different, at least in some regions. This clause indicates that people with both types of ISPs are treated identically, for example in relation to client movement. This will reduce red tape for CSOs and is welcomed.

Page 8, Sec. 1.5 Self-directed approaches – you're in charge

In Victoria, the delivery of supports for people with a disability is built on the principle of self-directed approaches. This means that people have the right to choose and manage their own supports where they are able to do so.

Comment:

It is suggested that the phrase *where they are able to do so* be omitted. The current phrasing may imply that those who cannot manage their own supports do not have the right to choose.

Page 10, Sec. 2.2 Using your funding

You can use your Individual Support Package...

Comment: Does this apply to use of FFYA funding?

Some key things to remember include:

your funding can only be used to provide support to you

Comment: This phrase suggests no cross subsidisation, yet this is permitted for group activities. Could this be clarified?

Page 11, Sec. 2.5 Is my funding safe?

Your Individual Support Package is portable. This means if you leave your current service provider and go somewhere else, you can take your funding with you...

Comment: It is suggested that this begin with 'yes', and more directly answer the question.

Page 11, Sec. 2.6 Moving regions or interstate

Your Individual Support Package is allocated to you. This means you can move within Victoria and the funding moves with you. If the move means that you change DHS regions, the DHS regional office will help you and your current provider coordinate the change.

If you move to another state or territory in Australia, there is an agreement that people with individual funding can ask for their funding to be transferred to their new state for 12 months. You can request this for your Individual Funding Package but will need to talk with your new state about what happens after 12 months.

Comment: It is suggested that the person talks with someone working in the relevant government department, rather than 'the state'.

Page 13, Sec. 3.3 Making changes

If you do want to try new things, remember some changes are easier to make than others. Different factors can affect how easy it is do new things, including:

- *where you live*
- *your support needs (including mobility)*
- *costs*
- *timing of activities*
- *staff experience at your Day Service*
- *community experience supporting people with a disability*

Comment: It is suggested that the skills and attitudes, as well as the experience, of staff at Day Service providers are important.

For example, you may need to find a contact at the library who can help show you what to do and help you settle in, or you might need to arrange transport to get to training. These are not impossible problems, but it may take some time to find people who can support you.

Comment: It is suggested that the potential role of day service providers in assisting people to develop new support options could be highlighted, eg. "For example, your day service provider may assist you to..."

Page 19, Sec. 4.3 Doing something really different

You may decide that you want to use your Individual Support Package to purchase supports that are much more flexible than Day Services can offer you.

Comment: it is suggested that this be amended to 'that are more flexible than what your current day services provider can offer you'. The program currently allows flexibility, but not all providers may offer the opportunities an individual wants.

Page 21, Sec. 5.1 Cost of Day Services

This usually means you will attend for six hours a day, Monday to Friday. However, this may be different if you and your Day Service have agreed to a specific timetable. For example, you may choose some one-to-one supports. These are usually more expensive which might mean you receive less than 30 hours support a week.

If you want to go to a group activity in a Day Service part-time, you will only be charged for the days you agree to attend.

Comment: It is suggested that this section acknowledge that it is possible for the purchaser and service provider to negotiate a charge, possibly different from the unit cost.

Page 23, Sec. 5.2 Fees

Some people are eligible for Mobility Allowance from Centrelink. If your Day Service charges you a fee for transport, it should not be more than the amount you receive in your Mobility Allowance.

Comment: It is recommended that the following be inserted at the end of this sentence: "except where the day services provider can provide you with an itemised listing of your actual transport expenses." At times transport can cost more than the mobility allowance and some people choose to pay for this if it enables them to undertake their chosen activities, and they have the means to do so.

Page 26, Sec. 5.6 Suspension or termination

Suspension and termination should only happen if there is a serious problem that cannot be resolved through discussion or making other arrangements. Before suspension or termination the Day Service provider must:

- *explain their reason for the suspension or termination with you and your supporters in person*
- *tell you the reason why they can't support you in a letter*
- *talk about what your options are, including what might be done to make sure you can return as soon as possible*
- *talk to the DHS regional office and explain why they think they can't support you at the moment*
- *talk about what this means for your funding and the options open to you*

Comment: This appears to be new policy. In the NDIS world, and now as services are preparing for this new environment, services will begin to specialise in certain sections of the market, and may choose not to service a particular client or client

group. As services move down this path the phrase “*Suspension and termination should only happen if there is a serious problem that cannot be resolved through discussion or making other arrangements*” will increasingly not apply. Furthermore, whilst it is good practice for a service provider to put in writing and discuss its decision with DHS, there is currently no policy that requires this.

Page 27, Sec.5.7 If your Day Service is closed

Your Day Service needs to close for a long time: Sometimes Day Services may need to close for a long time – for example if there is a flood or the building is damaged. If this happens your Day Service should let you and your family or carers know in a letter in a style that suits you. The letter should tell you how long the service will be closed and what alternative arrangements are being put in place to support you during the closure.

Comment: It is noted that the Disability Act requires information pertaining to sections in the Act be provided in an accessible form, however this requirement does not cover any other decisions (Section7). Whilst NDS supports such good practice for organisations to “let you and your family or carers know in a letter in a style that suits you” nor outline “how long the service will be closed and what alternative arrangements are being put in place”, it is noted that this is not a policy requirement.

Page 28, Sec 5.8 Reporting by our Day Service

...If you attend only one Day Service your provider will not keep itemised reports about your individual funding package....

Comment: It is suggested that “will not” be replaced with “may not”, as some services do provide itemised reports. Also, the section should acknowledge that some services may set their own costs and charging an amount as agreed with the person and his/her family.

Please contact Sarah Fordyce, ph.03 8341 4303, sarah.fordyce@nds.og.au if you wish to discuss these comments further.

Rhonda Lawson-Street
State Manager
NDS Victoria

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