



Building choice, control and confidence





**VCOSS submission to the NDIS
Support Coordination Discussion Paper**

September 2020

The Victorian Council of Social Service is the peak body of the social and community sector in Victoria.

VCOSS members reflect the diversity of the sector and include large charities, peak organisations, small community services, advocacy groups and individuals interested in social policy.

In addition to supporting the sector, VCOSS represents the interests of Victorians experiencing poverty and disadvantage, and advocates for the development of a sustainable, fair and equitable society.

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VCOSS acknowledges the traditional owners of country and pays respect to past, present and emerging Elders.

This document was prepared on the lands of the Kulin Nation.



Overview

The Victorian Council of Social Service (VCOSS) welcomes the opportunity to respond to the National Disability Insurance Scheme (NDIS) discussion paper on Support Coordination.

VCOSS is the peak body for social and community services in Victoria. As part of our sector leadership, VCOSS advocates for change to improve the lives of people with disability. VCOSS supports over 40 Victorian disability advocacy organisations to undertake collaborative systemic advocacy under the banner of the ‘Empowered Lives’ campaign.¹

VCOSS strongly supports the vision and goals of the NDIS to provide people with disability greater choice and control over their support services, and to improve social and economic inclusion. However, as identified in our previous submissions regarding the NDIS², VCOSS and our members remain concerned that people experiencing multiple and intersecting forms of disadvantage are the least resourced to engage with and benefit from the Scheme.

Learning about, accessing and making the most of the NDIS continues to be difficult for the very people it is intended to support. To access the Scheme, people with disability and their support network have to learn and interpret a sea of new terms, acronyms and what some have characterised as “magic words”, as well as understand and navigate a complex system, and build their confidence to self-advocate. After completing the NDIS planning process, around one in five participants are unclear about what happens next.³ Implementing a NDIS plan, by finding, purchasing and managing services, is challenging for many participants, their families and carers.

Support Coordinators play a crucial role in assisting people to connect with and coordinate their choice of services in a market-based system. Support Coordination is especially critical for people with complex needs, who need intensive and ongoing support to navigate the NDIS.⁴ Support Coordination funding is provided to around 40 per cent of participants, primarily as a time-limited, capacity-building service.

¹ Empowered Lives, [Empowered Lives Platform](#), accessed 4 September 2020.

² VCOSS, [Delivering on the promise: a better and fairer NDIS](#), October 2019; [Active market stewardship for the NDIS](#), June 2019; [Strengthening the NDIS](#), March 2018; [A smooth NDIS transition](#), August 2017.

³ NDIA, *NDIS Quarterly Report to disability ministers: Full report*, June 2020, p.45.

⁴ D Warr, H Dickinson, S Olney et. al., *Choice, Control and the NDIS: Service users' perspectives on having choice and control in the new National Disability Insurance Scheme*, Melbourne: University of Melbourne, May 2017, p. 55.

Without Support Coordination, people experiencing disadvantage and additional social and structural barriers may be less likely to activate and use their plan, and in turn, unable to access support services.

Ensuring Support Coordination and other service connection roles work well is central to a successful and fair transition to a market-based model of support. All NDIS participants should receive timely, quality assistance to understand and implement their NDIS plan, and to confidently and independently exercise choice and control.

VCOSS, in collaboration with the Future Social Service Institute, is currently undertaking a research project to explore the impact of the NDIS on Victorian disability advocacy and self advocacy organisations. The emerging findings of this research identify a range of key issues that impact NDIS participants in navigating the Scheme and using their funding plan:

- Disability advocacy and self advocacy organisations have experienced sustained, increased demand for support through the introduction of the NDIS, which has not been adequately supported by additional resources
- The roles and remit of Support Coordinators and the NDIA, Local Area Coordinators (LACs) and disability advocates is not well understood – this contributes to confusion, poor boundaries and attempts to handball tasks and responsibilities
- Support Coordinators frequently and inaccurately refer NDIS participants to disability advocacy organisations for assistance, often because they do not understand the role of advocacy or because there is limited funding available in a participant's plan to provide support
- Disability advocacy and self advocacy organisations are regularly asked to support people to navigate the NDIS access, pre-planning, implementation and plan review stages, even when this work is the responsibility of other parties
- When NDIS participants do not receive funding for Support Coordination, assistance from the NDIA or LAC, or their Support Coordination funding runs out, they often turn to disability advocacy organisations for assistance.

We encourage the NDIA takes a holistic approach to its review of Support Coordination to consider and clarify the roles, responsibilities and resources of all parties, and ensure all NDIS participants receive equitable support to access services and pursue their goals.

Support NDIS participants to understand and use their plan

RECOMMENDATIONS

- Ensure people with disability, their families and carers are aware of Support Coordination during the planning process.
- Include Support Coordination funding in all first plans.
- Provide adequate, ongoing Support Coordination funding and other targeted supports based on participants' individual needs.
- Clarify the role of Psychosocial Recovery Coaches, and how their role complements and intersects with Support Coordination.
- Ensure participants can access both Support Coordination and a Psychosocial Recovery Coach if required.
- Work with governments to ensure ongoing, intensive Case Management is provided to participants with complex and challenging support needs.

The principles of the *NDIS Act (2013)* promote the rights of participants to exercise choice and control, determine their best interests, take reasonable risks and engage as equal partners in decisions that affect their lives.

To access services with NDIS funding, participants are required to find and connect with service providers, often across large and multiple service systems. While the opportunity to make choices and have control is a vital and valued part of the Scheme, the shift of administrative responsibilities to people with disability and their support network presents additional challenges for many stretched and stressed participants and families.

Support Coordination is intended to address this need, by assisting people to find and connect to services, and to build their confidence to manage their supports independently. However, the allocation of Support Coordination funding, and the duration of funding, does not always fully consider the needs and circumstances of participants and their support network.

Fully and fairly consider participants' needs

The quality of NDS plans, including the provision of Support Coordination funding, largely depends on people's capacity to learn about and understand the system and to self-advocate. People experiencing multiple and intersecting forms of disadvantage and isolation face greater challenges at every stage of the NDIS journey, from finding out how it works to accessing the Scheme, developing a plan and connecting to services. Identifying and coordinating services can be particularly difficult for people with multiple and complex needs, including children and young people in out-of-home care or engaged in the Child Protection system, people from culturally and linguistically diverse communities, and people experiencing mental illness, homelessness or family violence.

The majority of children do not have Support Coordination in their plan⁵, which means plan implementation relies on families and carers. This creates an enormous workload for families and carers, who may be in the process of learning about and understanding their child's disability, new to accessing disability support services, and juggling parenting and work responsibilities.

Support Coordination is delivered across three tiers of support, each with an increased role and intensity. The Support Coordination funding hours provided in a plan are often inadequate, which impacts the duration and frequency of support participants receive. Support Coordination should be adequately funded at a level and quantity that aligns to participants' needs, for as long as participants, their families and carers need support. A formulaic approach to assess the level of Support Coordination required, and the number of funded hours needed, is unlikely to consider a wide range of factors experienced by participants. For example, people from culturally and linguistically diverse communities may need an interpreter to communicate with their Support Coordinator. Communicating via an interpreter may double the time needed for a conversation, however this is often not reflected in the allocation of Support Coordination hours.

While Support Coordination funding may be provided initially to assist participants with their first plan, funding hours are often limited. Support Coordination hours are also often reduced or removed too soon through subsequent plan reviews. When participants do not receive sufficient funding for Support Coordination, they must pursue changes through a lengthy and stressful plan review process. Participants may also face difficulties in finding a Support Coordination provider if their funded hours are too low.

⁵ NDIA, *Discussion Paper: Support Coordination under the NDIS*, August 2020, p.6.

Some participants may use some, or none, of their Support Coordination funding, however, it is important this is not interpreted to mean support is not required. The causes of low plan utilisation, of Support Coordination and any other supports, needs to be viewed in the context of plan quality, participant capacity and market supply.⁶ Participants may face a range of barriers in understanding their plan and finding a Support Coordinator, including thin markets. Participants with fluctuating or episodic needs, including people with psychosocial disability or chronic health conditions, may need more Support Coordination at some times and less at others.

As outlined in our submission to the NDIS Thin Markets Project⁷, VCOSS and our members are concerned that market failures – in this case, low plan utilisation or low uptake of certain services in participants' plans – can be interpreted as market signals and taken to mean participants' have less need for services in general.

The NDIA should carefully consider and explore the true drivers of low utilisation of Support Coordination. Low or no uptake of Support Coordination should be a trigger for more engagement and support – not less. The provision of Support Coordination funding should be flexible and responsive to participants' ongoing and changing needs.

Enhance support through Recovery Coaches

The NDIA funds Support Coordination across three levels of assistance and has expanded support offerings through the introduction of the Psychosocial Recovery Coach role. Through a person-centred, relationship-based approach, Recovery Coaches will work collaboratively with participants, families, carers and other services to identify, plan, design and coordinate NDIS supports.

It is not yet clear how the roles of Support Coordinators and Recovery Coaches will overlap or intersect with each other. Some participants may benefit from receiving support from both a Support Coordinator and a Recovery Coach. For example, through a complementary and collaborative approach, participants could work with their Support Coordinator to connect with and coordinate services, and with their Recovery Coach to build their resilience, relationships and confidence to work towards longer-term and ongoing goals.

⁶ VCOSS, *Delivering on the promise: a better and fairer NDIS*, October 2019.

⁷ VCOSS, *Active market stewardship for the NDIS*, June 2019.

An ongoing role for Case Management

While these roles support many participants, there remains an ongoing need for Case Management type assistance for people with complex and challenging needs. Support Coordination, even Specialist Support Coordination, is a more limited role than traditional Case Management, which provides more intensive, holistic support to coordinate care teams and foster communication and information sharing between services.⁸ For example, children in out-of-home care who may move between care settings, and people with multiple and intersecting disability and health needs, may benefit from the ongoing, consistent support of a Case Manager.

We believe participants should be fully and fairly supported to use their NDIS plan to access and coordinate services. Participants should be connected to the right level of support based on their individual needs and circumstances and enabled to build trusted, long-term relationships with their chosen Support Coordinator, Recovery Coach and/or Case Manager.

⁸ Office of the Public Advocate, *The Illusion of Choice and Control: The difficulties for people with complex and challenging support needs to obtain adequate supports under the NDIS*, September 2018.

Clarify and resource roles and responsibilities

RECOMMENDATIONS

- Partner with the disability advocacy and self advocacy sectors to gain a deeper understanding of their role and capacity in the context of the NDIS.
- Clarify and communicate the roles, responsibilities and boundaries of Support Coordinators, LACs, plan managers, mainstream services and disability advocates.
- Where roles are unclear and resources are inadequate, work with government and the sector to identify and address gaps and advocate for improved support for people with disability.

Support Coordination funding is not provided to all NDIS participants, and it is important to acknowledge that not every participant will want or need Support Coordination. However, when support is needed and is not provided, the need for assistance doesn't simply disappear – demand shifts to other roles and support systems, and pressure, stress and administration increases for participants, their families and carers.

We are seven years into the NDIS, yet there remains a high level of confusion about roles and responsibilities when it comes to plan implementation. Components of the Scheme are not working as envisaged, and demand and pressures for all parties have shifted and increased.

- The original design of Local Area Coordinator (LAC) positions included scope to support participants to implement their plan and to enhance access to community-based services. However, through the implementation of the NDIS, the role and focus of LACs changed and their capacity has been largely absorbed by plan development with participants.⁹
- Disability advocacy organisations have experienced significant increased demand for assistance, forcing many to maintain waiting lists or close their books¹⁰.

⁹ Senate Joint Standing Committee on the National Disability Insurance Scheme, NDIS Planning Interim Report, December 2019. p.40; E Malbon and G Carey, 'Market stewardship of quasi-markets by street level bureaucrats: The role of local area coordinators in the Australian personalisation system', *Soc Policy Adm.* 2020;1–16.

¹⁰ VCROSS, *Delivering on the promise: a better and fairer NDIS*, October 2019.

While governments share responsibilities for advocacy supports not covered by the NDIS¹¹, the additional advocacy workload generated by the NDIS has not been adequately or fairly recognised by funding increases for disability advocacy services.

- Many disability service providers also field requests to support people to understand and navigate the NDIS, which takes them away from service provision¹².
- The introduction of additional roles, including liaison officers, specialist planners and Psychosocial Recovery Coaches – while welcome – adds to an already extensive cast of players.

When boundaries are blurry and confusion reigns, people with disability, their families and carers are undoubtedly worse off. As identified by the Productivity Commission, the NDIA should clarify to scheme participants and the community the role of Support Coordinators in relation to Local Area Coordinators, plan managers, mainstream services and advocates.¹³

We believe the NDIA should work with the disability advocacy sector to understand their role and capacity, and collaborate with people with disability, families and carers, advocates, governments and providers to explore and address gaps and challenges that impact access to and use of the Scheme.

¹¹ Productivity Commission, *Study report: Review of the National Disability Agreement*, February 2019, p.91.

¹² National Disability Services, *State of the Disability Sector Report 2019*, November 2019, p.9.

¹³ Productivity Commission, *NDIS Costs: Study report*, Recommendation 10.1, p.59.

Empower NDIS participants to realise their human, legal and consumer rights

RECOMMENDATIONS

- Through a co-design approach, explore and define the role of Support Coordination and independent disability advocacy services in supporting people to understand and exercise their rights.
- Advocate for a stronger, comprehensive system to build awareness and understanding of the rights of people with disability, and to increase the confidence and self-advocacy skills of Australians with disability, their families and carers to exercise their rights.

Building an awareness about human, legal and consumer rights, and having the confidence and capacity to take action by claiming or exercising these rights, takes multiple conversations, time and practice. Many NDIS participants, their family and carers will need early and ongoing assistance to understand and use their funding, and to step into their power as consumers. They may also need support to challenge social and systemic barriers in other aspects of their life.

There is a role for Support Coordination, as a capacity-building support, to assist people to understand and exercise their rights, and to develop or maintain independent decision-making and self-advocacy skills. In fact, the aim of many Support Coordinators is to do themselves out of a job, by coaching participants to take control of their services and supports. However, the time-limited nature of their role and the focus on plan implementation often leaves little room for this type of support. Support Coordination is largely promoted and understood as a service connection type support, so when capacity-building concepts and coaching are introduced to participants by Support Coordinators, participants can be confused and reluctant to engage.

Disability advocacy and self advocacy organisations also support people with disability to understand their human and legal rights, including and beyond the NDIS, and assist people to communicate their needs and have their needs met.¹⁴

¹⁴ Disability Advocacy Resource Unit, [What is disability advocacy?](#), accessed 4 September 2020.

Our members report there is significant confusion about the roles and responsibilities of Support Coordinators and disability advocates in supporting people to learn about and exercise their rights. Disability advocacy organisations often field enquiries from Support Coordinators, seeking advice or assistance with their role, or inappropriate referrals for further support. For example, disability advocacy organisations have been asked by Support Coordinators to act as decision-makers or plan nominees for participants, by supporting people to choose services, sign service agreements or attend meetings. Disability advocates are also requested to step in when service provision is not working or the support provided is of poor quality.

There needs to be a shared understanding about the boundaries and intersections of the roles of Support Coordinators and disability advocacy organisations, and a firm and collective commitment to realise the rights of people with disability. We encourage further consultation to explore and define roles and responsibilities, and to identify what's needed to ensure participants are empowered to make independent, informed choices – in using their NDIS funding and in everyday life.

Independent disability advocacy protects and advances the rights and interests of people with disability. Disability advocacy and self advocacy organisations work alongside people with disability to understand their human and legal rights, communicate their needs and have their needs met.¹⁵ Advocates work with people with disability, their families and carers to navigate complex systems, solve problems and to build their self-advocacy skills.

Disability advocacy has been consistently recognised by previous inquiries as an important safeguard to help prevent and report abuse¹⁶, particularly for people who are afraid or face difficulties in raising issues or making complaints.¹⁷ Despite the importance of disability advocacy, its role is not well understood and services are chronically under-funded.¹⁸ To ensure the ambitions of the NDIS can be truly realised, we encourage the NDIA contribute towards and advocate for comprehensive coverage and equitable access to disability advocacy and self advocacy services.

¹⁵ Disability Advocacy Resource Unit, [What is disability advocacy?](#), accessed 15 June 2020.

¹⁶ Victorian Ombudsman, *Reporting and investigation of allegations of abuse in the disability sector: Phase 1 – the effectiveness of statutory oversight*, June 2015; Australian Senate Community Affairs Reference Committee, *Violence, abuse and neglect against people with disability in institutional and residential settings...*, Final report, November 2015; Victorian Ombudsman, *Reporting and investigation of allegations of abuse in the disability sector: Phase 2 – incident reporting*, December 2015; Parliament of Victoria Family and Community Development Committee, *Inquiry into abuse in disability services*, Final report, May 2016.

¹⁷ Ibid. Victorian Ombudsman, *Reporting and investigation of allegations of abuse in the disability sector: Phase 1*, June 2015, p. 86; *Reporting and investigation of allegations of abuse in the disability sector: Phase 2*, December 2015, p.18.

¹⁸ VCOSS, [Changing attitudes and realising rights](#), August 2020.

Invest in a strong, coordinated and collaborative ILC approach

RECOMMENDATION

- Enhance the capacity of Partners in the Community to undertake plan implementation activities, and to support people who are ineligible for the NDIS to connect to supports in their community.
- Provide additional and ongoing support for information, capacity and community-building programs and through the ILC Policy Framework and Investment Strategy.

Central to the provision of support for all Australians with disability is the effective operation of the Information, Linkages and Capacity Building (ILC) program, formerly known as tier 2 of the scheme. While the ILC program was originally intended to assist all people with disability, their families and carers, regardless of their eligibility for individual packages¹⁹, our members report limited assistance is available and that two key streams of the ILC policy framework – the role of Partners in the Community in connecting people to services, and the grants program – are not working as envisaged.

Partners in the Community, including Local Area Coordinators (LACs) and Early Childhood Early Intervention (ECEI) Partners, support people to understand and access the NDIS, and to create, implement and review their NDIS funding plan.²⁰ However, the scope and focus of Partners in the Community has shifted significantly through transition to the Scheme.

LAC and ECEI Partners are expected to undertake the dual roles of planning and coordination²¹. An evaluation of the NDIS in 2018 found there were perceptions LACs were not doing what they were employed to do, and that their skills and community connections were not being well utilised in their role.²² The pressure on LAC and ECEI Partners to bring participants into the Scheme has driven a higher focus on planning, at the expense of plan implementation, which may be another driver of demand for funded Support Coordination.²³

¹⁹ NDIA, *A framework for Information, Linkages and Capacity Building*, 2015.

²⁰ NDIA, *LAC Partners in the Community*, accessed 7 September 2020.

²¹ D Tune, *Review of the NDIS Act: Removing red tape and implementing the NDIS Participant Service Guarantee*, December 2019, p.41.

²² Mavromaras et. al, *Evaluation of the NDIS: Final report*, February 2018, p.83.

²³ D Tune, *Review of the NDIS Act: Removing red tape and implementing the NDIS Participant Service Guarantee*, December 2019, p.119.

To ensure all people with disability can access supports and services, LAC and ECEI Partners must be resourced to fulfil their full potential and to deliver on the service and community connection components of their role.

The NDIA is currently reviewing the LAC framework delivered through Partners in the Community²⁴. As part of this review, we encourage the NDIA to consider how the role and capacity of Partners in the Community can be strengthened to ensure NDIS participants, and those who are ineligible for the Scheme, can access information and supports.

The ILC grants program must also provide strong, sustainable support to enable people with disability to access information, build their skills and confidence and connect to services. The ILC Investment Strategy provides a pathway for strategic, longer term investment in information, capacity-building and mainstream economic and community programs, however, the direction beyond 2020 is not yet defined. Through the ILC program, initiatives that increase broader awareness and easier access to supports and services – for people who are eligible and ineligible for the scheme – should be funded.

²⁴ Australian Government, *Response to the 2019 Review of the NDIS Act 2013 report*, August 2020, p.4.

Strengthen the Support Coordination workforce and market

RECOMMENDATIONS

- Ensure Support Coordination and Recovery Coach pricing enables service providers to attract, support, train and retain skilled and experienced staff.
- Identify and address thin markets for Support Coordination, particularly in regional and remote areas and in specialist services, to ensure supply adequately meets demand.
- Work with people with disability, families, carers and the sector to design and deliver high-quality, consistent minimum training for Support Coordinators.
- Provide Support Coordinators with tools, resources and relationship-building opportunities to build their skills and strengthen their practice.
- Consider trialling outcomes measures for Support Coordination, focused on participants' self-assessed growth in their capacity and confidence to manage their plan and services.
- Reconsider the risks and implications of creating financial incentives for goal progression or achievement.
- Develop clear, practical conflict of interest guidelines to support providers and participants to understand real or perceived conflicts and to make informed decisions.

High quality Support Coordination offers invaluable support for participants, their families and carers. Support Coordinators assist participants to navigate a complex system to find and choose services based on their goals and needs, and to build consumer confidence and self-advocacy skills.

Newly introduced Recovery Coach roles will also support participants with psychosocial disability to build their capacity, skills and resilience to manage and take control of their lives and their recovery.

Support Coordination is a dynamic, relationship-based service that relies on the expertise, creativity, organisation and communication skills of staff. Support Coordinators work to build trust and rapport with participants, and to grow and maintain their knowledge and connections to local providers, to ensure people can access services and pursue their goals.

When NDIS participants receive Support Coordination funding in their plan, they have to shop around for a Support Coordination service in their community. In some markets, particularly in regional and remote communities, there are few Support Coordination providers available, so participants may have to go on a waiting list or choose a less experienced or less local provider.

There is considerable variation in the quality and consistency of Support Coordination across providers, which may be influenced by a range of factors including:

- the knowledge, experience and expertise of the provider and their staff
- confusion around roles, responsibilities and functions (as outlined in the section above)
- the availability or lack of Support Coordination funding hours in a participant's plan
- considerable time pressures on Support Coordinators to deliver appropriate support within a tight budget, and to manage a case load of participants
- high staff turn-over and burn out
- the impact of NDIS pricing on attracting and retaining experienced staff, enabling professional development and supervision, and delivering quality services.

Training, qualifications and resources

Currently, there is no requirement for all Support Coordinators to hold a particular qualification or to complete industry-specific training, aside from Specialist Support Coordinators who are expected to be experienced and qualified.²⁵

Current NDIS pricing may make it challenging for providers to attract and retain qualified staff, particularly to the new Recovery Coach role which recommends a Certificate IV in Mental Health Peer Work or similar, yet provides an hourly rate below that of a Level 2 Support Coordinator.²⁶

²⁵ NDIS, *Price Guide 2020-21 - Version 1.0.7*, August 2020, p.79.

²⁶ NDIA, *Discussion Paper: Support Coordination under the NDIS*, August 2020, p.6.

Support Coordinators and Recovery Coaches should be supported to build and maintain their skills and practice, through appropriate frameworks, training and peer support. The current development of the NDIS Workforce Capability Framework²⁷ and the NDIS National Workforce Plan²⁸ present opportunities to strengthen and support the Support Coordination workforce and market.

In Victoria, a voluntary registration scheme for disability workers, the Victorian Disability Worker Registration Scheme (DWRS), is set to be introduced from June 2021.²⁹ The Scheme aims to increase service quality and safety by encouraging workers to meet standards of practice that confirm their skills and experience to deliver supports.

As we identified in response to consultation on the DWRS, VCOSS members have a diverse range of views on minimum qualifications and value the choice and control of people with disability to select the workers who best match their needs.³⁰

There are many highly experienced Support Coordinators, including those with a background in Case Management, who may not necessarily have a formal qualification. The introduction of minimum qualifications may also have the unintended consequence of excluding or discouraging people with lived experience from becoming a Support Coordinator.

A gradual transition to minimum qualifications, coupled with improvements to the accessibility and quality of courses, could work to lift service quality and boost the value and respect of the disability workforce.³¹ Part of a transition to minimum qualifications could include a stronger focus on funded and consistent minimum training.

For example, the Course in Introduction to the NDIS (22469VIC) is a 40-hour course that was developed in consultation with the sector to provide an introduction to working in the field and a pathway into further studies.³² Providers of this course use the same suite of content and assessment resources, which drives consistency, reduces duplication and removes the costs of course development. A similar approach could be used to develop a course for current and prospective Support Coordinators and Recovery Coaches.

²⁷ NDIS Quality and Safeguards Commission, [NDIS Workforce Capability Framework](#), accessed 4 September 2020.

²⁸ Commonwealth Department of Social Services, [NDIS National Workforce Plan](#), accessed 4 September 2020.

²⁹ Victorian Disability Worker Commission, [Advantages of registration](#), accessed 4 September 2020.

³⁰ VCOSS, [Supporting a strong, safe and sustainable sector](#), February 2020.

³¹ VCOSS, [Supporting a strong, safe and sustainable sector](#), February 2020.

³² RMIT, [Course in Introduction to the National Disability Insurance Scheme – 222469VIC](#), accessed 4 September 2020.

The financial impacts of a transition to minimum qualifications, and the introduction of minimum training, must be fully considered. This includes the costs to the current and potential workforce, the impacts on pricing and rates of pay, and the capacity of pricing to support professional development and regular supervision.

The NDIA should partner with providers and the broader sector to develop additional information-sharing and relationship-building opportunities that assist Support Coordinators to improve their knowledge, expertise and practice.

The long-awaited Digital Market Service³³, formerly referred to as the eMarketplace, will assist participants and Support Coordinators alike. Local or online networks and communities of practice should also be fostered and encouraged.

Meaningful outcomes measurement

There is scope to consider the introduction of consistent outcomes measures for Support Coordination. These outcomes could focus on participants' growing capacity and confidence to manage their supports and exercise their rights, and be measured through self-assessment tools. Outcomes measures and measurement tools should be co-designed with people with disability, their families and carers, and the broader sector.

We caution the NDIA against connecting pricing or financial incentives to the achievement of goals or outcomes, in relation to Support Coordination or any other supports. If pricing is determined based on the achievement or progression of certain goals, pressure may be placed on participants to accept services and or make decisions that are not in their best interests, for example, accepting inappropriate housing or a job opportunity that does not align to their skills or interests. It may also create a disincentive for providers to work with participants with high and complex needs who may face greater challenges in pursuing or achieving their goals.

³³ NDIA, [Help shape the future of a Digital Market Service – 23 December 2019](#), accessed 4 September 2020.

Managing conflicts of interest

Conflicts of interest in Support Coordination, and across other services, should be appropriately managed and transparently communicated by providers, in line with the requirements of the *NDIS Act (2013)* and associated rules.

There are a range of reasons why a participant may access, and choose to access, multiple supports from the same provider – they may be the only provider in their community, or they may be a provider the participant knows and trusts. Every participants' circumstances are different, and stricter, prescriptive conflict of interest requirements may limit choice and control and exacerbate market issues.

Instead of additional market-wide measures, the NDIA could encourage greater visibility and governance of conflicts of interest at a provider level through the development of clear, practical guidelines. Appropriate measures to manage conflicts of interest will vary between providers, therefore, any guidelines should provide advice for providers to embed processes and boundaries within their organisation. Participants should also be provided with clear, accessible information about any real or perceived conflicts of interests to ensure they can make informed decisions about their supports.

