

Department of Human Services

Guidelines for Individual Support Packages July 2013



Association for Children with a Disability

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Introduction

Established in 1980, the Association for Children with a Disability (ACD) is a non-profit community based organisation representing children with a disability and their families living in Victoria. Our current membership includes over 2,000 families.

Statement of Purpose

- To empower parents of children with a disability to be as self-sufficient as possible in advocating on behalf of their child and family.
- To promote and advance the rights of children with a disability and their families.
- To advocate on behalf of children with a disability and their families to ensure the best possible support and services are available.
- To work collaboratively with other organisations to improve the service system for children with a disability and their families.

General Comments

Thank you for the opportunity to provide this feedback to the DHS draft 2013 ISP documents.

Please do not hesitate to contact Janice Chan on 9818 2000 or email janicec@acd.org.au if you require clarification or discussion of any of the following feedback.

Documents reviewed:

- Individual Support Package guidelines draft
- Individual Support Package Handbook draft
- Individual Support Package Guidelines Practice Advice draft
- Individual Support Package Guidelines Information Sheets draft
- Individual Support Package guidelines Disability day services operating requirements draft

ACD Feedback/comment:

General feedback:

The quality of the information provided in these documents is generally very informative, easy to read, and has a minimum of jargon.

We have a number of suggestions for further improvement:

- **Structure**

The structure/range of documents is unwieldy to work with and cross reference. We acknowledge the challenges when there is a large quantity of information, but ISP/FFYA recipients must be able to access accurate, up to date information easily. The handbook would benefit from a more integrated structure, for instance day services and the alternate funding arrangements are all mentioned in a number of places, then have separate chapters as well. The need to cross reference between pages and chapters makes the assimilation of information more difficult.

- **Content**

There is information and detail contained in the other draft ISP documents, which is not contained in the draft ISP handbook, such as detail about GST in the information sheets, and information about behaviours of concern in the draft ISP disability day services operating requirements. The handbook should contain all information that is available in the other documents if it is intended to provide accurate accessible and complete information to the reader.

- **Accessibility**

We recommend that people be provided with the ISP handbook upon application for an ISP, or in Year 11 or 12 of school, rather than at the time of receiving a letter of offer. For people applying for an ISP and for students transitioning into a FFYA program, this information should be an integral part of their knowledge building from the outset. People with a disability and families should also be made aware of the whole range of ISP guidelines, operating procedures, information sheets and practice notes, for those who wish to have a broader understanding.

While all of these documents are available on the DHS website, not everyone has access to a computer and internet, know what to look for, and how and where to find it. Our work with families indicates that the paucity of information made available to them has contributed to subsequent issues.

- **Futures for Young Adults package**

As an individual support package covered by this suite of ISP documents, the Futures for Young Adults program should be acknowledged as an ISP, and that this suite of ISP documents applies to FFYA. Additionally we recommend that all people with disabilities transitioning out of school with FFYA packages be informed about that FFYA falls under ISP guidelines, and be provided with the ISP documentation. We know from the families we work with that these families are not aware that FFYA is an ISP, and have not been provided with ISP documentation.

We are concerned about the lack of reference to FFYA throughout the draft ISP documentation.

- **Information about DisabilityCare**

With the recent launch of DisabilityCare there will undoubtedly be many questions about how the policies, guidelines, information and service provider relationships set out in the ISP documentation will be impacted or interface with their counterparts in DisabilityCare. Whatever the response to this question, ACD recommends the inclusion of information about the interface of the ISP documentation and DisabilityCare.

- **Planning and goals**

Robust person centered planning is the foundation and starting point before services and funding should be considered. As such, we would recommend that Planning has its own chapter in the handbook. Planning is not even mentioned in the draft ISP

guidelines (except for support plans), and we believe it should be included. Frequent references back to your plan and your goals should be made at key decision making points.

- **Consistency**

There needs to be consistency across all documentation. There are slight differences in content between the documents, which creates confusion. Ensure that relevant Practice guides and information sheets are referenced throughout all the ISP documentation consistently.

- **Language**

The language and tone varies across the documents. While the language and tone of the handbook is person centered, the guidelines, disability day services operating requirements, information sheets and practice notes are not. We understand that the various documents are targeted at different audiences, nevertheless, when working with human services programs, person centered approaches should be embedded into all areas as much as possible, including the way documents such as these are written. Language that promotes a person centered approach rather than brisk business language, may help to remind service providers of the individuality of each person they work with, beyond the process or policy level.

Specific feedback:

ISP Handbook draft	Page	Feedback/comment
Structure and content		<p>The handbook provides the basic information, but not the level of detail available in the other documentation, and does not contain, for instance, any information about Behaviours of concern (section 2.10.2 – from ISP Disability Day services operating requirements), nor about critical incidence reporting (3.2.4 Critical incidence reporting – from ISP Disability Day services operating requirements). We recommend the inclusion of these two subjects in the handbook in an appropriately worded format.</p> <p>Colour coding of chapters is helpful if people have a colour copy. It would also be helpful to have chapter headings in the header of each page.</p> <p>The structure of the handbook is somewhat unwieldy with the need to cross reference between appendices and chapters for certain subjects, for instance day services, direct payment, direct employment and financial intermediary service. As additions to the current handbook, these last chapters are not well integrated into the overall structure of the draft handbook.</p>

		We recommend better integration of chapters 4, 7, 8, 9 and 10 and improving the flow and structure.
1. Introduction		Recommendation: include the 'Context' information from the ISP guidelines
2.5 Things to think about when planning for your ongoing supports	12/13	<p>Being grouped in 'Getting started' with process information about receiving and accepting an offer detracts from the importance of planning and setting your goals.</p> <p>Recommendation – Planning should become a chapter on its own, to refresh and remind people that their plan is about them, their goals and their aspirations. It should reiterate person centred practices and individualized pathways. It should include broader information about what ISP funding can be used for, including options outside of day services. It should not be written on the assumption that people will use day services.</p> <p>The handbook seems to be written in a way which places more emphasis on day services and not enough emphasis on community and other options.</p> <p>'Things to think about' should start with 'Review of your goals and your plans'</p> <p>Peer support – this is a good initiative</p>
	16	<p>First dot point should read 'you', not 'them'</p> <p>The and/or pathway could be misconstrued – the 'and you are experiencing financial hardship' could be taken to apply only to the previous dot point. Suggest you follow the arrangement used for Practice Advice #3 – Applying the funding principles to complex decisions.</p>
3.2 How the funding principles work	17	<p>'Can you get the proposed supports through a contribution to another funding source' Should this read FROM another funding source? There should be a NO option as well as a YES option.</p> <p>'One or more of the discretionary criteria apply to you' the words 'discretionary criteria' have no point of reference. The flow chart refers to 'The principles' not 'discretionary criteria'. It would be less confusing if the terminology was consistent.</p>

3.3 What can be purchased?	18	Add 'What you decide to purchase should fit in with your plans and goals.' As the second sentence in this section.
3.4 Who can supports be purchased from?	18	Add information about the status of day services as registered disability service providers. Add the information that day services are for adults, not for children. Re – the last dot point on the page – please include a reference for standards for disability services in Victoria.
3.5 Selecting service providers	21	Add as 2 nd dot point <ul style="list-style-type: none"> Do these supports fit in with my plan and help me to achieve my goals?
GST	24	'The department will pay the GST amount in addition to the addition to the funding you are allocated for supports.' This statement needs further clarity so people are aware that if they choose direct payments or financial intermediary, the funding plan needs to be clear about the GST component and that this will be added to their notional payment . The information sheet provides good detail but people may not be able to access the information sheet or even know it exists. More detail should be provided in this section, as well as in the chapters regarding the various payment arrangements in the draft ISP handbook.
Appendix 3.1	27	'Supports that other people pay for'. This is ambiguous and could be misconstrued to mean 'Supports that other people will pay for, for me'. The use of the word 'supports' seems odd here as well, as electricity, whitegoods and holidays are not really 'supports'. Suggestion – 'Expenses that people usually pay for themselves' There is an asterisk on vehicle purchases but there is no footnote for the asterisk. We query why vehicle modification is on this list, as it is not an everyday item that non-disabled people usually need. Vehicle modification for a person with a disability is usually directly related to their disability.

		<p>The Appendix is contradictory as it starts off talking about things that people usually pay for themselves (and that cannot be funded by the ISP packages), then goes on to what evidence to provide. There needs to be an explanation that in exceptional circumstances payment for these items using ISP funding may be considered under certain criteria.</p> <p>Having information in a separate Appendix from section 3.1 makes it very hard to follow. Suggest all this information is kept together as section 3.1 or at the very least move the information from the appendix - 'What other evidence might be needed'- back into section 3.1 and keep the appendix just as a list.</p> <p>'What other evidence might be needed?' The language of 'evidence' has not been previously used, so it does not follow to ask what other evidence might be needed. The word 'evidence' in itself is somewhat intimidating and 'corporate'. An alternate heading could be 'What information you must provide'.</p> <p>The evidence that may be requested is a long and daunting list. It is not reasonable to expect a person to explore all these potential sources of funding let alone supply evidence against each of these dot points. It is reasonable to expect a person to have explored a number of disability funding sources that they have used before, but the extent of this list seems excessive.</p> <p>Re dot point 4 - If the person with a disability is an adult, it is not reasonable to ask if their family members have the means to purchase or contribute to an item. Firstly, the implication that the person should supply evidence about their family's income is a breach of the family's privacy and not information that DHS should be requesting for the purpose of this criteria, and secondly, like any other adult they should be treated as independent (even if they are not) and afforded the dignity that any independent adult should expect.</p> <p>Re dot point 7 - That a person might have to provide evidence that charitable and philanthropic funding sources have been explored and are not available or appropriate is a particularly onerous and excessive expectation.</p>
5. Your funding plan	37	This section should be integrated with section 2.5, and should be the third Chapter in the handbook.

		See attachment – section 5 Your funding plan for suggested wording amendments
5.2 Putting your funding plan into action	41	Information about using a combination of funding arrangements should be included.
Changes that you need to tell the department about	46	Dot point 2 is incomplete
Getting help with implementing your plan	45	FFYA recipients receive support from transition coordinators, not facilitators. They might be the same people but the FFYA recipients do not know that, and this terminology should be included in this section.
5.6 Unspent funds	49	Is this information consistent with 7.5 Non-attendance at your day service, p 66. Again, cross referencing has been difficult and we are not certain that these 2 pieces of information align
Appendix 5.1 Support coordination	53 54	<p>Re dot point 3 – ‘according to this advice’ – what advice are we referring to – this phrase seems out of place</p> <p>Same comment as for p 27 ‘What other evidence might be needed?’ The language of ‘evidence’ has not been previously used, so it does not follow to ask what other evidence might be needed. The word ‘evidence’ in itself is somewhat intimidating and ‘corporate’. An alternate heading could be ‘What information you must provide’. Or better still, it would seem to better serve its purpose to call it ‘Things to think about in considering support coordination’</p> <p>Re dot point 4 – family members should not be made to feel incumbent to take up this role</p>
Other providers of personal care support	58	Other providers of personal care support may not be covered by the Disability Act, but people shouldn’t be discouraged or excluded from contacting the Disability Services Commissioner for advice or other referral.
7. Day Services	60	The tone of this whole chapter differs from the preceding chapters - it does not read as if it is driven by person centred individualised planning – it reads as if it is service driven. It is not written in a way which reminds people that it is their decision where they want to get their services from, how often and in what form (see attachment for 7.3

		<p>Things you need to think about if using day services for suggested wording amendments to pages 61, 62).</p> <p>It is somewhat at odds too, that the day service should support someone to develop a plan if they do not already have one – it is almost inevitable that such a plan will focus on what the day service has to offer rather than what the person actually wants.</p>
Infectious medical conditions	67	<p>Is there reciprocity in this policy? Are service users assured that all staff at day services will stay away if ill as well?</p> <p>What happens with funding if the person is quite ill, and therefore cannot attend their day service, but require some supports at home?</p>
Suspension or termination	67	<p>Where is the process information before you reach a point where suspension or termination? Processes leading up to this point should be included, outlining review of plans and goals, behavior support, plans to address issues, and finally, if termination is to occur, assistance to transfer to another day service or alternate programs. Is the 2 month notice period waived when someone is terminated from a day service? The person will need funds immediately for their ongoing support.</p>
8. Direct Payments	70	<p>This chapter contains no information about the department funding GST in addition to the notional allocation. If this is not applicable to direct payments, funding recipients have to be made aware. This is an important factor in weighing up which funding arrangement to nominate, as there is potential for the direct payment user to be worse off by up to 10% of their notional allocation.</p> <p>However if the addition of GST to the notional allocation is not applicable to direct payment users, ACD questions the reasons for this inequitable situation.</p>
	73	<p>Last sentence on page is incomplete.</p>
	76	<p>Why is information about unspent funds being removed from the direct payments section? It should be retained, people using direct payments should have the benefit of the same unspent funding arrangement as users of other financial arrangements, and the benefit of use of the full extent of their notional allocation.</p>
Complaints about direct	80	<p>There must be a timeline stipulated during which the person will receive a response from the department.</p>

payments		Information about the Disability Services Commissioner should be included this section.
ISP disability day services operating requirements draft		
1.1 Application of the guide	2	In the current document the funding sources are identified. This has been omitted from the draft. We recommend that this information be retained in section 1.1
		Section 1.3 of the current guideline 'Reorientation of Day Services' has been omitted. This section contains excellent information which sets the tone and context for supporting people in a valued and individualised manner. We recommend this be retained, as contextual information. The note about students and FFYA is important information and should also be retained.
2.1 Cost of attending a day service	4	Confusion re name of assessment for DSR/isp – is this called an SNA as well? JANICE READ THIS AND COMMENT ??? references to unit price
2.4.1 Support plans	5	The first sentence must reference the Disability Act 2006 (The Act), as it has not been previously referenced in this document.
2.4.2 planning to change supports		The flowchart in the current document has been omitted from the draft. We recommend retaining the flow chart, as it provides an alternate way for the information to be communicated.
2.6 Increased support need	7	Paragraph 3 - Into the first sentence after 'If it is determined that the increased supports require additional funding.....,' we recommend that the words '(either time-limited or ongoing)' be inserted. Also recommend the retention of sentence in the current document 'Requests must be made in full consultation with the person and their supporters and include an explanation of the subsequent process and possible outcomes.'
2.7 Funding no longer required	7	Last sentence - 2 nd last word should read 'departmental'
ISP draft guidelines		We refer you to the general comment about language, and reiterate specifically that language that promotes a

<p>draft</p>		<p>person centred approach rather than brisk business language, may help to remind service providers of the individuality of each person they work with, beyond the process or policy level.</p> <p>There is no mention of planning. Again, we refer you to our general comments about planning, and specifically that frequent references back to the person’s plan and the person’s goals should be made at key decision making points. We consider it incumbent upon service providers to bear this in mind at all time</p>
<p>Information Sheet #3 – Current unit prices draft</p>		<p>There are a number of confusing points about this unit price list:</p> <ul style="list-style-type: none"> • What does it mean that the department has set unit prices? Do disability service providers have to abide by these prices or can they charge higher? • Case management has not been mentioned in the draft ISP handbook • There is no unit price for support coordination, which has been mentioned a lot • The unit price for therapy – is this for therapies provided by day services? – how does privately sourced therapy fit in with this? • The current list cites day services, and the draft cites day ‘supports’ – what does ‘day supports’ mean – has not been previously mentioned • The term ‘SNA levels’ has not mentioned in the ISP handbook. An SNA level is also not a disability service that can be purchased • The FFYA levels are in the current list but have been omitted from the draft list/substituted by SNA levels. There is no explanation of SNA levels and no contextual information • The tying together of ‘day supports’ with ‘SNA levels’ in this way (Day Support/SNA level) may infer to the FFYA recipient that there is a direct link between the two - that the expected ‘choice’ they will make will be to attend a day service • There is no mention of ISP bands. <p>We recommend providing more contextual information and more explanation to address the above points.</p>