

Administration of National Disability Insurance Scheme (NDIS) funded assistive technology

REPORT ON THE NATIONAL DISABILITY INSURANCE AGENCY'S
HANDLING OF ASSISTIVE TECHNOLOGY REQUESTS

August 2020

Report by the Commonwealth Ombudsman,
Michael Manthorpe PSM, under the *Ombudsman Act 1976*

REPORT NO. **05 | 2020**

CONTENTS

EXECUTIVE SUMMARY	4
PART 1: INTRODUCTION AND SCOPE OF INVESTIGATION	5
Our role	5
<i>Oversight of the National Disability Insurance Agency.....</i>	<i>5</i>
<i>Complaints and previous work on systemic issues.....</i>	<i>5</i>
Background to the investigation.....	6
<i>Joint Standing Committee inquiry into assistive technology.....</i>	<i>6</i>
Objective and scope	7
Methodology.....	7
PART 2: ASSISTIVE TECHNOLOGY AND THE NDIA	9
What is assistive technology?	9
NDIS planning and assistive technology	9
<i>Approving assistive technology—‘reasonable and necessary’.....</i>	<i>10</i>
<i>Plan reviews to include funding for assistive technology.....</i>	<i>11</i>
PART 3: NDIA ACTIONS TO DATE	12
Assistive technology/home modification redesign project	12
<i>Phase one—Low cost and basic assistive technology.....</i>	<i>12</i>
<i>Phase two—Supporting participants to identify supports before planning and trialling an amended assistive technology process to address the backlog in requests.....</i>	<i>12</i>
<i>Phase three—roll out of a national approach.....</i>	<i>13</i>
PART 4: ISSUES ARISING OUT OF INVESTIGATION	14
A) Internal process and guidance	14
<i>Consistent end to end guidance and advice</i>	<i>14</i>
<i>Managing requests and enquiries.....</i>	<i>15</i>
<i>Accessing staff guidance.....</i>	<i>16</i>
B) Decision making processes for planning.....	17
<i>Improved early identification of supports</i>	<i>17</i>
<i>Supporting participants to gather and provide information for their assistive technology request.....</i>	<i>17</i>
<i>Increased post planning meeting opportunities</i>	<i>18</i>

Clear information to participants about assistive technology decision-making after plan approval..... 19

Review rights..... 20

C) Public information and responsiveness.....21

Communicating decision-making timeframes 21

Acknowledging requests for complex assistive technology 22

Responding to complaints..... 22

Recording and analysing complaints to influence 23

Measuring decision-making and forecasting capacity to meet demand 24

PART 5: CONCLUSION **25**

APPENDIX A—RESPONSE FROM THE NATIONAL DISABILITY INSURANCE AGENCY **26**

EXECUTIVE SUMMARY

This report is the outcome of my Office's own motion investigation into the National Disability Insurance Agency's (NDIA) administration of assistive technology, funded under the National Disability Insurance Scheme (NDIS).

Assistive technology is an umbrella term for any device or system that allows a person to perform tasks that they would otherwise be unable to do, or increases the ease and safety with which tasks can be performed. Access to assistive technology is essential to support people with disability to participate more fully, easily and safely in daily activities.

The report focusses on the NDIA's administration of requests reflecting the issues of concern raised in complaints to the Office. In 2018–19 complaints about assistive technology constituted 13 per cent of NDIA complaints to my Office, compared to five per cent in the previous financial year. The most common issue in complaints about assistive technology is the time taken to process requests. Participants and their representatives have expressed confusion about the process and frustration at the lack of clear communication from the NDIA about expected decision timeframes.

In December 2018, the Joint Standing Committee on the NDIS (Joint Standing Committee) completed an inquiry into the provision of assistive technology under the NDIS. Its recommendations included that the NDIA improve consistency of information in all aspects of the assistive technology process, reduce timeframes for processing assistive technology applications, simplify and better utilise existing assistive technology administration and delivery infrastructure.

We commenced this investigation to complement the work of the Joint Standing Committee, by focusing on the NDIA's administration of requests for assistive technology. Specifically, we have examined whether the administrative processes the NDIA has in place appropriately handle requests, address delay and provide timely and clear advice about the decision-making process and timeframes for decision.

The investigation identified that the NDIA has undertaken significant work in improving its approach to assistive technology. However, we also consider that further work needs to occur to support participants in quickly accessing the assistive technology supports they need.

This report includes 14 recommendations designed to assist the NDIA to improve the participant experience for those who require assistive technology. These recommendations focus on improvements to internal processes and guidance, decision-making processes for planning, public information and responsiveness. I am pleased that the NDIA's response at Appendix A agrees with all but two of these recommendations and outlines progress it is making to implement the recommendations with which it agrees. I consider ongoing implementation of these recommendations will help to ensure participants' experience remains central to the provision of assistive technology supports.

Regarding the remaining two recommendations, I welcome the NDIA's advice about the steps it is taking to improve its plan amendment processes (recommendation 7) and acknowledge receipt of complex assistive technology requests (recommendation 11).

Part 1: INTRODUCTION AND SCOPE OF INVESTIGATION

Our role

1.1. Under the *Ombudsman Act 1976* (Cth) (Ombudsman Act), the Commonwealth Ombudsman investigates complaints about Australian government agencies. The purpose of the Office of the Commonwealth Ombudsman (the Office) is to:

- provide assurance that the organisations we oversight act with integrity and treat people fairly
- influence systemic improvement in public administration in Australia and the region.

1.2. We seek to achieve our purpose through:

- correcting administrative deficiencies through independent review of complaints about Australian Government administrative action
- fostering good public administration that is accountable, lawful, fair, transparent and responsive
- assisting people to resolve complaints about government administrative action
- providing assurance that Commonwealth, state and territory law enforcement, integrity and regulatory agencies are complying with statutory requirements and have sound administrative practices in relation to certain covert, intrusive and coercive powers.

Oversight of the National Disability Insurance Agency

1.3. As part of its oversight role of Commonwealth government administration, the Office handles complaints about the National Disability Insurance Agency's (NDIA) administrative actions and decisions. We can also consider complaints about organisations which are contracted to deliver services on behalf of the NDIA, such as local area coordinators (LACs).

1.4. The Office monitors issues arising from complaints about the NDIA, the media or feedback from stakeholders and uses this information to identify systemic administrative issues that have the potential to adversely impact a large number of NDIS participants. When we identify a systemic issue, we work closely with the NDIA to improve the administration and implementation of policies and programs. The Ombudsman may choose to investigate a systemic issue using the own motion powers under the Ombudsman Act.

1.5. The Office aims to provide assurance to the public and to the Parliament by releasing reports and making submissions to parliamentary inquiries based on the systemic issues we observe through complaints and feedback to the Office. This includes submissions to the Joint Standing Committee on the National Disability Insurance Scheme (Joint Standing Committee) which undertakes inquiries into various aspects of the NDIS.

Complaints and previous work on systemic issues

1.6. Since the National Disability Insurance Scheme (NDIS) rollout commenced in 2013, the number of NDIA complaints to the Office has increased each year. In 2018–19, the Office received 1,711 NDIA complaints. This was an increase of 12 per cent on the previous

financial year. The top three issues raised in complaints to the Office related to the NDIA's handling of:

- plan and internal review requests (33 per cent)
- assistive technology (13 per cent)
- planning (13 per cent).

1.7. In May 2018, the Ombudsman published the report, *Administration of reviews under the National Disability Insurance Scheme Act 2013* (reviews report). That report highlighted systemic issues with the NDIA's handling of reviews, including significant backlogs, delays in decision-making and poor communication with participants. The report made 20 recommendations aimed at improving the NDIA's administration of reviews, all of which were accepted by the NDIA.

1.8. Last year, the Ombudsman decided to commence an own motion investigation to follow up and publicly report on the implementation of recommendations made in several public reports published between 2017 and 2019. The Office is currently preparing this report, which includes our assessment of the NDIA's progress in implementing the reviews report recommendations. We anticipate publishing the report in the second half of 2020.

1.9. As part of our role in influencing systemic improvements, the Ombudsman makes submissions to parliamentary inquiries informed by issues highlighted in complaints and feedback provided to the Office from stakeholders. In September 2019, the Ombudsman made a [submission](#)¹ and gave evidence to the Joint Standing Committee's inquiry into planning, highlighting issues with plan gaps and plan reviews.

Background to the investigation

Joint Standing Committee inquiry into assistive technology

1.10. In August 2018, the Joint Standing Committee commenced an inquiry into the provision of assistive technology under the NDIS.

1.11. The Office made a submission to the inquiry which highlighted issues with:

- delays in decision-making
- confusion surrounding the assistive technology process, including an apparent lack of clear guidance about how to make a request for assistive technology and what information or evidence is required
- inconsistencies in advice about who can prepare assistive technology quotes and what must be included.

1.12. In December 2018, the Committee released its report and made eight recommendations. The recommendations included that the NDIA improve consistency of information in all aspects of the assistive technology process, reduce the timeframes for

¹ https://www.ombudsman.gov.au/data/assets/pdf_file/0011/92000/Commonwealth-Ombudsman-Submission-to-Joint-Standing-Committee-on-the-NDIS-Assistive-Technology-A1665749.pdf accessed 19 May 2020.

processing assistive technology applications, and simplify and better utilise existing assistive technology administration and delivery infrastructure.

1.13. In March 2019, the government agreed to the recommendations either in full, or partially or in principle where it did not consider it possible to implement recommendations as written. During the inquiry, the NDIA acknowledged it was aware of problems with its administration of assistive technology requests and advised that it had commenced a range of improvements to its administration. These included:

- short term changes to streamline and simplify processes and systems, including introducing a new funding tool to reduce the need for quotes for certain items, and including funding in plans for replacing and repairing assistive technology items
- establishing a dedicated team to address delays in assistive technology plan approval and implementation
- exploring a new approach to more complex assistive technology requests.

1.14. We have monitored the changes to the NDIA's administration of assistive technology requests through our liaison with the NDIA and acknowledge the considerable work undertaken. However, we also observed an increase in complaints to the Office about assistive technology during 2018–19. In this period, assistive technology was raised as an issue in 13 per cent of the NDIA complaints to the Office, compared with five per cent in the previous financial year.

1.15. In looking at the specific issues raised, the complaints continued to highlight similar issues to those the Office noted in its submission to the Joint Standing Committee's inquiry into assistive technology. These included delays, confusion about the assistive technology process and frustration at the lack of clear communication from the NDIA about expected decision timeframes on assistive technology requests.

1.16. In April 2019, the Ombudsman decided to commence an own motion investigation into the NDIA's administration of NDIS funded assistive technology.

Objective and scope

1.17. The purpose of the Office's investigation was to seek assurance that the NDIA had clear administrative processes in place to handle requests, address delays in decision-making and provide participants with timely and clear advice about both the assistive technology decision making process and timeframes for decision. The intention was to complement rather than duplicate the work of the Joint Standing Committee.

1.18. The report focuses on the NDIA's administration of requests for assistive technology, reflecting the issues of concern raised in complaints to the Office.

Methodology

1.19. In May 2019, the Office met with the NDIA to discuss the scope of the investigation. We asked the NDIA to provide an update of its progress in piloting and rolling out changes to the assistive technology process.

1.20. We attended four briefings with the NDIA in June and July 2019 which covered:

- improvements to processes for handling assistive technology requests and addressing a backlog in requests
- the NDIA's role and approach to assistive technology
- the role of the NDIA's technical advisory team in assistive technology decision making
- communication with participants.

1.21. The NDIA also provided us with copies of various internal guidance documents which related to its administration of assistive technology requests and complaints. This included practice guides, standard operating procedures, task cards and draft guidance materials used by staff to pilot and trial changes to the handling of assistive technology requests.

1.22. In October 2019, we undertook fieldwork to observe NDIA staff making decisions on assistive technology requests. This included observing how staff access the NDIA's internal guidance material to undertake their work and how they advise participants of the outcome of assistive technology requests.

1.23. The findings of the investigation and our recommendations are based on our assessment of the material gathered and the issues we routinely see in assistive technology complaints.

1.24. At the time of the investigation, the NDIA was still piloting changes to the assistive technology process. We have engaged regularly with the NDIA on the key themes and issues the report seeks to address. We would like to thank the NDIA and its staff for its responsiveness and cooperation during the investigation.

Part 2: ASSISTIVE TECHNOLOGY AND THE NDIA

What is assistive technology?

2.1. Access to assistive technology is essential to support people with disability to participate more fully, easily and safely in daily activities. Assistive technology is an umbrella term for a device or system that allows a person to perform tasks that they would otherwise be unable to do, or increases the ease and safety with which tasks can be performed.²

2.2. Assistive technology ranges in complexity and cost from supports that can be purchased off the shelf, such as a non-slip bath mat, through to supports that are individually customised to meet a person's circumstances, such as a customised wheelchair. For NDIS purposes, assistive technology also includes vehicle modifications.

2.3. The NDIA categorises assistive technology into four levels:

- Basic (level 1) assistive technology is low cost and low risk to the participant, can be purchased from retailers and requires little to no assistance to set up and use. For example, a walking stick or large print labels.
- Standard (level 2) assistive technology is low to medium risk and can be purchased 'off the shelf' and requires minimal adjustment, such as an adjustable shower chair.
- Specialised (level 3) assistive technology is similar to level 2 but is adjusted to suit the person's needs. Examples include pressure mattresses and power wheel chairs.
- Complex (level 4) assistive technology is custom made or configured for the participant. This requires specialist and/or ongoing support to identify, select and use, for example, prosthetics and complex home modifications.

2.4. The assessment and quote requirements to support a request for assistive technology differs depending on the level of assistive technology requested.

NDIS planning and assistive technology

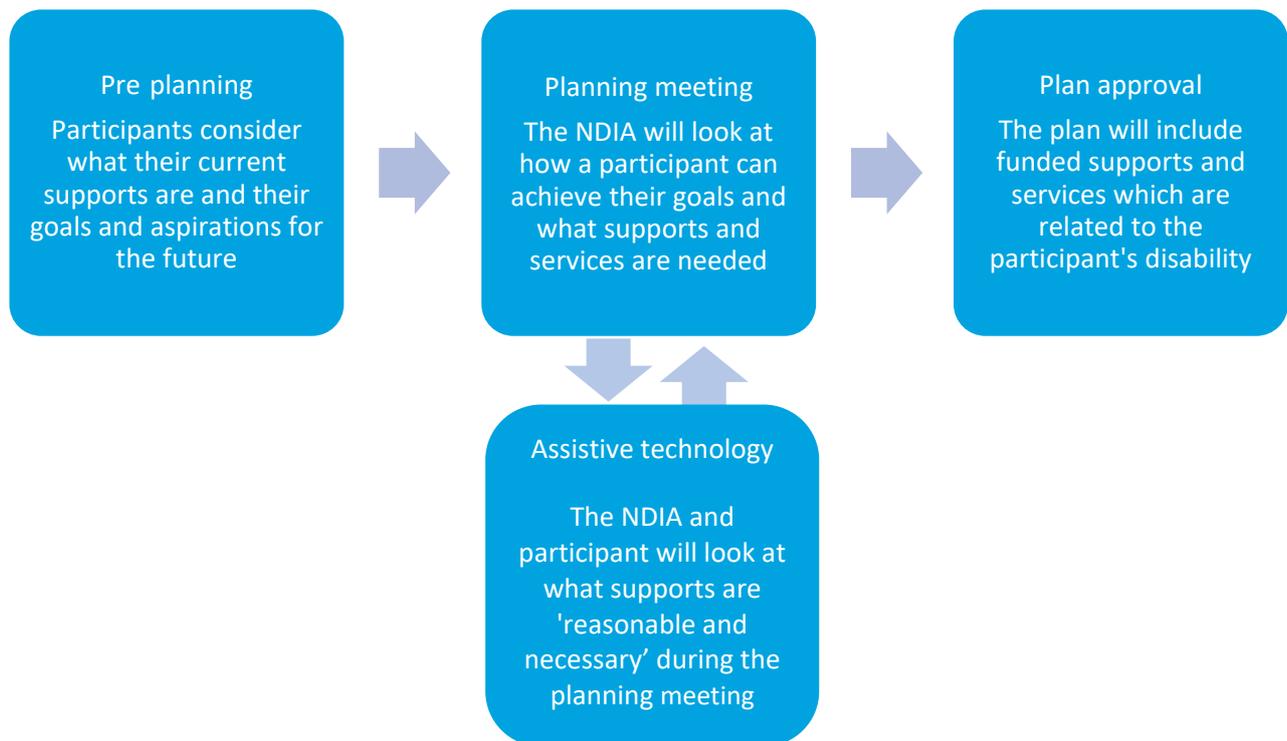
2.5. People who are granted access to the NDIS are called 'participants'. Once a person becomes a participant, they commence the planning process, as outlined in Figure 1 below. There is a pre-planning stage, where the participant identifies their current supports and their goals for the future, followed by a planning meeting where the participant develops a plan in conjunction with the NDIA. Once the plan is approved by the NDIA, participants can begin to use it to access supports to meet their goals.

2.6. An NDIS plan has two parts:

- the participant's statement of goals and aspirations, which is prepared by the participant and states their goals, objectives, aspirations and personal context
- the statement of participant supports, which is prepared with the participant and approved by the NDIA.

² World Health Organisation definition of 'assistive technology'.

Figure 1—NDIS planning process



2.7. The statement of participant supports sets out the supports that will be funded by the NDIA. This includes funding for assistive technology supports.

Approving assistive technology—‘reasonable and necessary’

2.8. In making a decision about whether to include a support in a participant’s plan, the NDIA must consider a range of matters set out in the *National Disability Insurance Scheme Act 2013* (the NDIS Act), including the participant’s statement of goals and aspirations.

2.9. Section 34 of the NDIS Act sets out the reasonable and necessary criteria that must be satisfied before a support can be approved. To be considered reasonable and necessary, a support:

- must be related to a participant’s disability
- must not include day-to-day living costs not related to the participant’s disability support needs, such as groceries
- must represent value for money
- must be likely to be effective and beneficial for the participant
- must take into account support given to the participant by other government services, their family, carers, networks and community.

2.10. Ideally, decision-making for assistive technology supports would occur before or at the same time the participant’s plan is being developed and approved. However, this is contingent on:

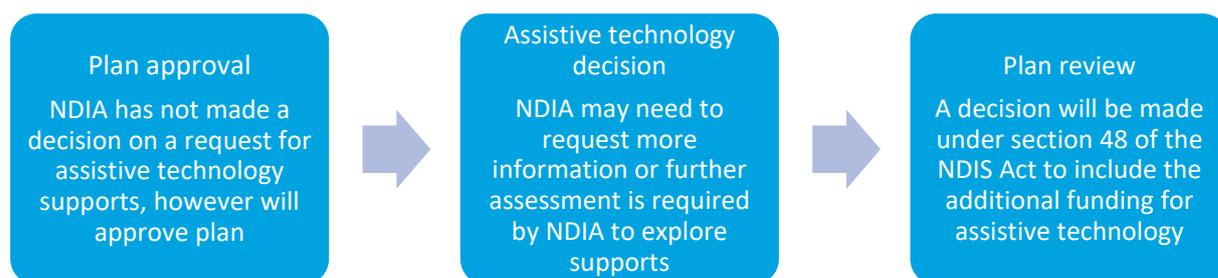
- early identification of appropriate supports as part of the planning process
- the NDIA having all the required information to make a decision
- the NDIA having capacity to make a decision on a request prior to plan approval.

2.11. Participants can provide information to support their request for supports, including assessments by allied health professionals and quotes, where required.

Plan reviews to include funding for assistive technology

2.12. There are circumstances where the NDIA will approve a plan without having yet made a decision on a request for assistive technology supports, see Figure 2. This commonly occurs where the NDIA requires additional information in order to make a decision, or where a need for assistive technology is identified at planning, but further assessment is required to explore appropriate supports for the participant.

Figure 2— Assistive technology decision-making after plan approval



2.13. In these cases, the NDIA will still approve a plan for the participant, so they can start to access other supports while waiting for the assistive technology requests to be decided. Then, once additional information is provided about the assistive technology request, the NDIA will decide whether to change the plan to include funding for the additional supports. However, as the plan has already been approved, a plan review under s 48 of the NDIS Act is required to include additional funding for approved assistive technology supports.

Part 3: NDIA ACTIONS TO DATE

Assistive technology/home modification redesign project

3.1. At the time we commenced the investigation, the NDIA was already in the process of undertaking an assistive technology/home modification redesign project (the project) to streamline decision-making and to explore offering greater support to participants before their planning meeting, to facilitate early identification of appropriate assistive technology.

3.2. The project had three phases:

- The first phase was already implemented when the investigation commenced and covered changes to basic and standard assistive technology supports.
- The second phase considered the NDIA's approach to preplanning and its handling of requests for specialised and complex assistive technology supports. This phase was underway during the investigation.
- The NDIA advised that the project's third and final phase is the roll out of a new national assistive technology/home modification pathway. This phase was to be implemented after the fieldwork for the investigation was completed and informed by phase two including the pilot of the specialised assessment services panel, discussed below.

Phase one—Low cost and basic assistive technology

3.3. In May 2018, the NDIA implemented changes to its handling of requests for funding for basic and standard assistive technology supports. This included eliminating the need for participants to provide quotes for supports that are less than \$1,500. From February 2019, planners also started consistently including sufficient funding for replacement, repair and maintenance of current assistive technology in participants' plans, where required.

Phase two—Supporting participants to identify supports before planning and trialling an amended assistive technology process to address the backlog in requests

3.4. As part of phase two, the NDIA:

- piloted the introduction of a specialised assessment services panel to help participants identify appropriate assistive technology and home modification supports before their planning meeting
- trialled an amended assessment process to streamline existing assistive technology decision-making processes and address the backlog in requests.

Specialised assessment services panel

3.5. The NDIA established a specialised assessment services panel pilot in March 2019 to help participants identify specific assistive technology and home modification supports before their planning meeting. The aim of the pilot was to reduce participant wait times for complex assistive technology supports. It used a panel of experts in assistive technology and home modification to make recommendations about appropriate assistive technology and home modification supports which could then be included in the participant's plan at the point it is initially approved.

3.6. The pilot was soft launched for an initial period of four months in four regions in New South Wales and the Australian Capital Territory. It was limited to participants who had a scheduled plan review at the time of the pilot. The NDIA advised it received a report on the pilot's independent evaluation on 21 November 2019 and as at March 2020 was in the process of considering the recommendations regarding a national roll out.

Amended assessment process for assistive technology decision-making

3.7. The NDIA advised that it was trialling an amended assistive technology assessment process to support decision makers to progress the assistive technology requests in the backlog. The outcome of the trial would also inform the roll out of a national process for assistive technology. The NDIA also established a central service delivery support alliance (SDSA) team (separate from planners) to triage and process outstanding requests.

3.8. The amended process provides a framework to support staff to make decisions on less complex requests, while streamlining the requests referred to the technical advisory team (TAT). The NDIA has also provided additional training to staff in assistive technology, with staff now reporting greater confidence in decision-making and improved understanding about when to seek advice from the TAT.

3.9. In building on the changes to low cost supports, the NDIA advised it was taking a risk based approach in determining what assessment or quote information it requires to make a decision about whether a support meets the reasonable and necessary criteria. From October 2019, participants have been able to purchase assistive technology supports valued at less than \$5,000 without quotes or further approvals, once the support has been identified in their plan as reasonable and necessary. Participants are still required to obtain an assessment to assist with identifying appropriate supports, however the assessments no longer need to be provided to the NDIA.

3.10. The NDIA advised that by bringing further clarity to assistive technology decision-making, it has been able to process over 90 per cent of requests using the amended assessment process, with only seven per cent of requests being referred to the TAT. This has led to a significant improvement in the TAT's timeframes for responding to requests for more complex and specialised assistive technology. The NDIA advised that by November 2019 it had finalised all the outstanding requests identified in March 2019.

Phase three—roll out of a national approach

3.11. Phase three of the assistive technology/home modification project was to roll out a new NDIA national pathway for assistive technology.

3.12. In early 2020, the NDIA advised that aspects of the amended assessment process have been incorporated into its day to day approach to handling assistive technology requests. However, it acknowledged it has been slower to update all of its internal guidance to staff and publicly available information for participants. The NDIA also advised that it is still considering the evaluation report for the specialised services assessment panel pilot.

Part 4: ISSUES ARISING OUT OF INVESTIGATION

4.1. Although the investigation found the NDIA has undertaken significant work to improve its approach to assistive technology, in our view further work is needed to support participants to quickly access the assistive technology supports they need. Specifically, the NDIA needs to address continued concerns around time delay, communication and advice by improving the following aspects of its administrative processes:

- internal process and guidance
- decision making processes during planning
- public information and responsiveness.

A) Internal process and guidance

Consistent end to end guidance and advice

4.2. As noted above, the NDIA has told us that it has already incorporated aspects of an amended assessment process into its day to day processes. In our view, we consider these changes will help support staff make more timely decisions in response to requests. However, to mitigate confusion and uncertainty amongst staff and facilitate compliance with processes, it is critical the NDIA properly implement and document its entire approach to handling assistive technology requests.

4.3. From the documents we reviewed during the investigation, it was difficult to form a clear picture of the end to end process for handling assistive technology requests. We understand the NDIA has developed some standard operating procedures to support staff who are making decisions on requests. However, it has also acknowledged the practice guide for assistive technology has not been updated to reflect the changes.

4.4. We observed inconsistency in the terminology used both in the guidance materials to staff and in the information available to participants on the NDIA's website. For example, we noted that certain documents, including factsheets to participants, refer to categorising assistive technology by levels. However, the NDIA clarified during the investigation that it is moving away from categorising assistive technology in this way, because it has previously caused confusion for both staff and participants. We note there is further work for the NDIA to do in revising all of its assistive technology related internal guidance and factsheets to ensure these documents are consistent.

4.5. Given previous issues with lack of staff confidence in decision-making, it is our view that all steps in the process for handling assistive technology requests should be clearly documented to establish a clear national process. This should include a mechanism for quality assurance of decisions, to identify any gaps in training or the process.

Recommendation 1

The NDIA implement an internal end-to-end process for handling and assessing assistive technology requests. The process should:

- a) be clearly documented in staff procedure(s) for example, standard operating procedures or other guidance documents

- b) be consistent with information the NDIA makes publicly available about assistive technology requests
- c) include a quality assurance step to monitor compliance with policies and identify any gaps in staff training.

Managing requests and enquiries

4.6. At the commencement of the investigation, the NDIA advised that nationally there were over 30 email inboxes receiving assistive technology requests and queries. The NDIA explained this occurred because each region was responsible for handling its own assistive technology requests. Separate regional inboxes were created to receive information from participants in each region.

4.7. The NDIA advised it was in the process of closing the inboxes, to better manage the volume of contact and duplicate requests and enquiries. The NDIA was aiming to redirect all communication to the Agency to the National Contact Centre, which handles all enquiries about the scheme from members of the public. This includes enquiries about assistive technology.

4.8. The NDIA also advised that participants can submit information to the NDIA in a variety of ways. Assistive technology requests and queries which come in by email must be manually processed by staff for input into the system. The volume of contacts and manual processing requirements reduce the NDIA's capacity to process requests in a timely manner. It diminishes visibility of work on hand, as some participants may submit a request more than one time or through more than one channel. It also makes it difficult for frontline staff to provide participants with accurate responses to enquiries about the status or receipt of requests.

4.9. As the NDIA matures, it would benefit from a single platform to manage its interactions with participants. This would enable staff to quickly and easily identify what recent interactions the participant has had with the NDIA, including where they are in the planning process and what decisions or outcomes are still outstanding.

Recommendation 2

The NDIA implement a single national participant (or client) records management system that allows staff to store, manage and retrieve all information relating to individual participants, including information about current plans, approved supports, scheduled plan reviews and any contacts the participant has made with the agency.

Noting there are frequently long lead times for implementing IT solutions, we recommend that in the meantime, the NDIA:

- a) establish and resource a central coordination process to efficiently identify and consolidate incoming communications received from various channels into a central client record location
- b) close and consolidate its regional email inboxes into a central inbox.

4.10. The new system should also include a workload management process function to provide greater visibility for managers of unactioned requests, so the requests can be progressed in a timely way. In investigating complaints about delay, we identified instances

where requests had not been progressed due to the responsible NDIA staff member being on leave or having left the team or agency, without their work being reallocated.

Case study 1—Assistive technology enquiry overlooked

In late August 2019, a complainant complained to our Office on behalf of a participant in the NDIS that the NDIA had not resolved their enquiries about a funding shortfall for the cost of a powered wheelchair.

The complainant advised our Office that funding for the wheelchair had been approved in late November 2018. Although quotes had been provided, there was a shortfall in the amount approved and the actual cost of the support. The complainant stated the participant's existing wheelchair was broken and the participant was becoming distressed and depressed because they were unable to use it properly or without assistance from others. The complainant said that despite approaching the NDIA and offering to pay for the shortfall themselves, the NDIA had not been able to advise them on what to do to resolve this issue.

In response to our investigation, the NDIA resolved the complaint and provided an apology to the participant. The NDIA advised that much of the delay was caused by a staff member leaving the agency and their work not being handed over.

4.11. In January 2020, the NDIA advised the Office it had recently implemented processes to follow up on work that had not been actioned over a period of 10 days. While this provides a useful strategy to escalate unactioned work, we consider the NDIA should implement more proactive processes to ensure work is reallocated or reassigned depending on the availability and caseloads of staff. This will ensure that requests are not unnecessarily delayed.

Recommendation 3

The NDIA ensure requests for assistive technology are not missed if staff are on leave or have left the NDIA by:

- a) including a workload management function in its new participant records management system (see recommendation 2)
- b) implementing a workload management process to proactively reallocate or reassign work in real time, depending on the availability and caseloads of staff.

Accessing staff guidance

4.12. During the investigation, we considered the existing and draft staff guidance material relating to assistive technology. This included standard operating procedures for different aspects of the amended assessment process, and an assistive technology task card and practice guide. We found the overall guidance for staff to be lengthy and difficult to navigate, with multiple documents involved, often directing staff to read and consider other material.

4.13. From complaints, we have noted instances where the NDIA has acknowledged that staff have not followed existing policies or procedures. During our fieldwork, in October 2019, staff told us they searched for and accessed guidance material for their work on the agency's intranet.

4.14. The NDIA told us it is doing work on simplifying staff guidance. While this is positive, staff still need to be supported to easily access guidance while they are in the process of undertaking their work, whether this be for assistive technology or other aspects of the NDIA's work. As the NDIA continues to mature into a national organisation, a knowledge management system similar to Services Australia's operational blueprint would support staff in achieving efficiency, consistency and compliance with policies and procedures.

Recommendation 4

To improve consistency and accuracy, the NDIA implement a fit for purpose knowledge management system to support staff to easily access guidance and procedures in a central location.

In the meantime, the NDIA should improve navigability of existing guidance documentation, for example by improving length, clarity and narrative coherence of available guidance and reducing links to separate documents and guidance.

B) Decision making processes for planning

Improved early identification of supports

4.15. An integral part of timely assistive technology decision-making is facilitating, where possible, the early identification and inclusion of appropriate supports in participants' plans.

4.16. There are several clear benefits in providing participants with greater assistance to identify supports before their planning meeting. These include supporting participants to exercise choice and control in choosing supports and minimising the need for additional plan reviews and longer wait times. The early identification of supports would also assist participants with preparing the necessary information needed for planning meetings to support requests for assistive technology.

4.17. The NDIA is considering the evaluation report for the specialised services assessment panel pilot. It is our view that as a priority the NDIA needs to finalise its consideration of the report and determine what assistance can be provided to participants before their planning meeting to facilitate early identification of supports.

Recommendation 5

The NDIA, informed by the evaluation of the specialised services assessment panel pilot, implement a process to assist participants to identify assistive technology supports at pre-planning, to ensure their inclusion in plans at the earliest opportunity. The NDIA should update staff guidance and procedures to reflect the new process and provide information about the process to participants, for example, in the participant booklet and/or on the website.

Supporting participants to gather and provide information for their assistive technology request

4.18. The investigation identified gaps in the NDIA's communication with participants particularly around the information needed to support an assistive technology request, acknowledging requests and decision-making timeframes.

4.19. In our submission to the Joint Standing Committee, we highlighted the confusion and frustration experienced by participants at the lack of clear and consistent advice about the assessment and quote information the NDIA needs to decide a request.

4.20. We acknowledge the NDIA has worked to improve the information on its website about assistive technology and has hosted a webinar to provide participants with an opportunity to ask questions and hear about the changes it is making. However, given the changes the NDIA is making to the assistive technology process, it is important the NDIA continue to improve the general information provided to participants, about this aspect of the planning process. This includes providing clear and accurate advice about information the NDIA is likely to need to make a decision on an assistive technology request.

4.21. During the investigation, we considered the information currently in the NDIA's participant booklets. Participant booklet 2 on planning advises participants to gather any information or reports the participant would consider to be helpful for the NDIA. We do not think this is sufficiently clear in helping a participant to understand what specific information they should bring to their planning meeting, particularly because there are different assessment and quote requirements depending on the type of assistive technology support requested.

4.22. We consider that it would be of benefit to both participants and the NDIA if the NDIA captured in the participant booklet, or in one location on the NDIA's website (with reference to that location in the participant booklet), general information on the assessment and quote requirements for commonly requested assistive technology supports.

4.23. Providing participants with this information early in the planning process would assist them with gathering the necessary information for their planning meeting. It would assist in minimising the need for additional interactions between participants and the NDIA to clarify information requirements or to request additional information. It would also reduce the need for subsequent plan reviews to include assistive technology supports in plans. All of these factors contribute to delays for participants in accessing the supports they need.

Recommendation 6

To help participants gather and prepare information for their planning meeting, the NDIA should provide clear information about the assessment and/or quote requirements for commonly requested assistive technology supports. This information could be included in the participant booklets or on the assistive technology page for participants on the NDIA's website, with a reference to the website in the participant booklet.

Increased post planning meeting opportunities

4.24. After the planning meeting, the participant's plan is built in the NDIA system. The complaints we receive show there is often a lag between the planning meeting and the plan being built in the NDIA system and approved. There is an opportunity for the NDIA to include in the planning process a window of time for participants to provide further information to support their assistive technology request. This should occur following the planning meeting, but prior to plan approval, where it appears to the planner the outstanding information could be gathered quickly.

Recommendation 7

The NDIA amend its assistive technology and plan approval processes, to include a step at the conclusion of the planning meeting to invite participants to provide any outstanding/additional documents to support their assistive technology request, within a specified timeframe, prior to approving the plan.

4.25. In making these recommendations we are aware that planning timeframes have been highlighted for inclusion in the proposed participant service guarantee. Any opportunity to provide information to the NDIA would need to be subject to the legislative timeframes provided for under the guarantee.

Clear information to participants about assistive technology decision-making after plan approval

4.26. We acknowledge there will be instances where the participant will be unable to gather the required information for a decision to be made on their request prior to the plan being approved. In these instances, it is important the NDIA provides participants with clear information about the process for having assistive technology included in their plans at a later stage.

4.27. We have observed from our complaints that there is still confusion amongst participants about what path to take in order to progress their assistive technology request, especially in cases where they receive a plan that does not include funding for assistive technology and comes with no additional advice about whether the funding has been refused, or the request has simply not yet been finalised.

Case Study 2—Confusion around assistive technology decision-making after plan approval

A participant in the NDIS complained to our Office about confusion and delays with the assistive technology process. They advised that in early 2019 they requested funding for a wheelchair and home modifications and supplied information to the NDIA at its request.

In late 2019, the NDIA approved their plan. However, they were uncertain whether their requests for the wheelchair and home modifications had been considered or funded in the plan. The complainant told us they requested an internal review of their plan. They complained that despite contacting the NDIA twice in the months after receiving their plan, they had not received an outcome on either their requests for assistive technology, or the request for internal review of the plan.

We investigated the complaint. In response, the NDIA undertook an unscheduled plan review and approved a new plan for the complainant which included funding for the wheelchair and home modifications. The NDIA advised our Office that it contacted the complainant to explain its decision and as the requests had been funded, the complainant withdrew their internal review request.

4.28. Clearer general information to participants, both verbally and in writing, about how funding can be added to a plan, if a decision on a request is not made at the same time a plan is approved, would help alleviate uncertainty about this part of the decision-making process.

Recommendation 8

The NDIA should explain to participants the process for having assistive technology included in their plan, either at the planning meeting or at plan implementation, if a participant is unable to provide the information required to support an assistive technology request before the plan is approved.

This requirement should be supported by:

- a) clear instructions in the NDIA's guidance to staff about the need to provide participants with information about the assistive technology approval process
- b) written information for participants about the assistive technology process, e.g. in the form of a factsheet, update to the participant booklet and/or on the website.

Review rights

4.29. In October 2019, we undertook fieldwork and observed the service delivery support alliance team using the amended assessment process to progress and finalise assistive technology requests.

4.30. We observed situations where the NDIA advised participants it would not fund the particular support requested, but was willing to fund a similar support that would still meet the needs of the participant. In these instances the NDIA asked for consent to include the alternative support in the statement of participant supports in the plan.

4.31. It is important that the procedural guidance for staff also covers the scenario where a participant disagrees with a decision not to fund the original support requested. In essence, this is a decision to not include a support in the plan and would result in internal review rights should the participant wish to seek review of the decision.

4.32. We are concerned that existing guidance material does not provide for this scenario. It appears that, where a plan is in place, the action of undertaking a plan review on the system would only be commenced if the NDIA decides to approve funding for the support. In cases where it refuses and cannot obtain agreement from the participant to fund an alternative support, the situation is less clear.

4.33. In our review of staff guidance material, we did not see evidence of guidance to staff about what action they should take. We consider the NDIA needs to ensure staff have the necessary guidance to assist them in providing accurate information to participants about their ability to have the NDIA's decision reviewed.

Recommendation 9

The NDIA provide information to support staff to explain to participants:

- a) where a plan is in place, a subsequent decision not to include requested supports in the plan is a reviewable decision

b) the steps to take if a participant disagrees with the decision, including advising participants of their review rights and sending a written notice confirming the decision and their review rights.

C) Public information and responsiveness

4.34. Frustration at the lack of communication from the NDIA about the status of assistive technology requests is a common theme in complaints to the Office. Complainants have told us that although they have submitted information to support their request, they have not received any acknowledgement that the information has been received by the NDIA, or timely advice that further information is required.

4.35. The lack of communication coupled with long delays in assistive technology decision-making has caused people to make repeat contact with the NDIA, to check the status of a request. Participants and their nominees have told us that when they contact the NDIA for an update, staff are often unable to provide any clear advice about the likely timeframe for a decision to be made. This causes uncertainty and frustration as participants are waiting for supports.

4.36. In our 2018–19 annual report, we published the following case study which demonstrates the issues typically present in assistive technology complaints to the Office, including the frustration felt by people in attempting to navigate the system and follow up their request.

Case study 3—Delays and lack of communication about progress of request

A person contacted our Office due to delays in receiving assistive technology in their NDIS plan. They told us they were in hospital and were waiting for the NDIA to approve funds so they could obtain customised mobility equipment and have modifications made to their home. Once the modifications were made they could leave hospital and go home. They told us they had followed all the steps advised by the NDIA, including providing quotes and assessments, and despite calling the NDIA multiple times had waited five months for a decision before approaching our Office.

We investigated their complaint. We noted the request had been handled by multiple teams and there had been lengthy delays in both processing the request and responding to the participant's attempts to follow up the NDIA's decision.

During the investigation, the NDIA acknowledged the complexity of this participant's circumstances. It took action to provide a support coordinator to assist the participant in engaging with the hospital and in obtaining the mobility equipment and the required modifications, so the participant could leave hospital and return home.

Communicating decision-making timeframes

4.37. In October 2018, the NDIA advised the Joint Standing Committee it was designing a method to track assistive technology requests in its business system. This would allow participants to view the status of their request in the Myplace portal. At the time, the NDIA anticipated that the changes would be made to the Myplace portal in the first half of 2019.

4.38. In briefing the Office as part of this investigation, the NDIA advised there are no firm plans to use the Myplace portal as a means for participants to track their assistive

technology requests. In response to a complaint investigation, the NDIA also confirmed that its current staff guidance does not contain any expectation that staff will acknowledge requests or check that all information needed to make a decision has been provided.

4.39. In working through the backlog of requests, the NDIA advised that it is currently aiming to decide simple assistive technology requests within 10 days and complex requests within 90 days. We note that the Joint Standing Committee previously recommended to the NDIA that it prescribe key performance indicators for the length of time that staff must consider and process assistive technology requests and that this recommendation was supported by the NDIA.

4.40. In our view, the NDIA should also publish its assistive technology decision timeframes on its website to reduce uncertainty amongst participants. This could be published on the NDIA's website with other existing assistive technology information or with other key timeframes. Information about timeframes should be made available to frontline and complaint staff, who may receive enquiries about assistive technology.

Recommendation 10

The NDIA publish its service standards for responding to assistive technology requests on its website.

Acknowledging requests for complex assistive technology

4.41. In relation to complex requests that may require referral to the TAT for specialist advice, we consider the NDIA should acknowledge receipt of these requests given they may take some time to resolve. The NDIA should require staff to provide participants with confirmation that their request and any related information, has been received. They should also confirm whether the NDIA requires further information.

Recommendation 11

The NDIA should amend its assistive technology processes, to require staff to acknowledge receipt of complex assistive technology requests within 10 working days. The acknowledgement should let the participant know whether any further information is required.

Responding to complaints

4.42. Given the absence of procedures to acknowledge assistive technology requests and enquiries, many participants lodged complaints with the NDIA to follow up the status and timeframe for their request. This in turn resulted in people expressing frustration to our Office about both the timeframes they experienced in responding to their initial assistive technology requests and about the handling of their subsequent complaint to the NDIA. Frequently we are told that even when participants contact the NDIA's complaint area, they do not receive clarity about timeframes for decisions. Complainants are frustrated at receiving advice to call again to follow up at a later stage or that they should simply wait for a decision to be made.

4.43. Complaint investigations by our Office show that people can make multiple contacts to the NDIA and not receive any meaningful information about the status or timeframe for decision. This included instances where the participant has urgent circumstances. This can

have significant ramifications for participants who are waiting for important assistive technology supports.

Case study 4—Escalating complaints in vulnerable circumstances

A parent of a child who is an NDIS participant complained to our Office about delays in receiving funding for a new wheelchair for their child. The parent told our Office they provided the NDIA with quotes for the wheelchair at their child’s planning meeting. However, when the plan was approved, funding for the wheelchair was not included.

The parent advised that they asked the NDIA to undertake an unscheduled plan review. Despite making multiple contacts to the NDIA over the course of four months, they had not received an outcome and complained to our Office. In the complaint, the parent advised that their child could not leave home or attend school and was at risk of self-harm as a result of the delay in obtaining a wheelchair.

We made inquiries to the NDIA in response to the complaint. The NDIA acknowledged the participant’s vulnerability and escalated the review request. The review was completed and the participant’s request was approved.

4.44. In reviewing the guidance provided by the NDIA, we did not see evidence of clear advice to staff on how to respond to assistive technology complaints and enquiries. There is a need for the NDIA to develop this guidance to support frontline and complaints staff to provide participants and their nominees with meaningful information about the progress of their request. This is particularly important where an assistive technology request may take longer to finalise and where participants present with urgent circumstances that might mean their assistive technology request should be escalated.

Recommendation 12

The NDIA develop guidance for complaint handling and frontline staff to respond to assistive technology enquiries by:

- a) providing participants with the status and timeframe of a request
- b) escalating the participant’s request if it meets the circumstances outlined in the NDIA’s internal prioritisation matrix for triaging complaints.

Recording and analysing complaints to influence

4.45. In October 2019, the NDIA advised our Office it had improved its complaint handling functionality to allow staff to record the issues being raised in complaints by participants, including for assistive technology.

4.46. Complaints can provide departments and agencies with valuable information about its service delivery. They can help to identify recurrent or systemic problems and guide improvements to processes and communication.

4.47. In our view, the NDIA’s new functionality presents an opportunity for it to analyse complaints about assistive technology. The findings from this analysis could then be used to identify potential gaps in its process for assistive technology and improve the content of advice and general information, for participants on the NDIA’s website and in planning meetings.

Recommendation 13

The NDIA should implement an ongoing and regular process to analyse assistive technology complaints and use the data collected to inform improvements to its administrative processes and information provided to participants about assistive technology.

Measuring decision-making and forecasting capacity to meet demand

4.48. In piloting the amended assessment process, the NDIA confirmed that it had not undertaken any analysis to measure how long different parts of the assistive technology assessment process took. While the NDIA has established internal KPIs for assistive technology decisions, it is important that it be able to measure how long various parts of the process will take to assist with planning to meet anticipated demand for assistive technology.

Recommendation 14

The NDIA measure the average time it takes to decide an assistive technology request in order to calculate its capacity to meet anticipated demand for assistive technology within its service standards.

Part 5: CONCLUSION

5.1. The NDIA anticipates that at full scheme roll out there will be 460,000 participants in the NDIS. As at 31 March 2020, there were 364,879 participants with an approved NDIS plan. The NDIA advised that 25 per cent of participants had capital assistive technology supports valued at greater than \$1,500 included in their plans and 77 per cent of participants had consumables (including low cost assistive technology supports) funded. Given the numbers, it is critical that the NDIA has the right service delivery framework in place to successfully deliver and support people with disability to access the supports that they need.

5.2. While this report was focussed on the handling of assistive technology requests, it has highlighted many of the same issues identified in the Office's reviews report. Issues such as delays in decision-making and the need to establish clear processes to support staff to carry out their work while keeping participant's informed about decision timeframes.

5.3. Delay is a recurring issue across all parts of the NDIS—from access to the scheme, to planning and in assistive technology requests. Last year, the Australian Government announced its intention to establish the Participant Service Guarantee (PSG) which will set legislated timeframes for key parts of the NDIS process.

5.4. The Office has been given a role in monitoring the NDIA's performance against the PSG timeframes. In our view, without making significant changes to the way the NDIA administers its work, there is a risk that delays will continue and the timeframes in the PSG will not be met, driving further complaints and work for the NDIA.

APPENDIX A—RESPONSE FROM THE NATIONAL DISABILITY INSURANCE AGENCY



GPO Box 700
Canberra ACT 2601
1800 800 110

ndis.gov.au

Mr Michael Manthorpe PSM
Commonwealth Ombudsman

Mr Manthorpe

Thank you for your email of 5 June 2020 about the National Disability Insurance Agency's (NDIA) handling of Assistive Technology requests.

The NDIA appreciates the opportunity to review and provide a formal response to the report in advance of publishing. A copy of the reviewed report complete with tracked changes requested by the NDIA and responses to the recommendations is provided at Attachment A.

The NDIA takes very seriously the feedback provided by the Office of the Commonwealth Ombudsman and values its contribution to the continuing improvement of the services delivered to potential participants, participants and their support networks.

Our response and our commitment to the recommendations to can be found at Attachment B.

Thank you again for bringing your concerns to my attention and providing the NDIA with valuable feedback to improve the standard of services delivered by the Agency.

In the meantime if you have any questions or concerns please feel free to contact Brett Bennett, General Manager Participant Experience Design Division at brett.bennett@ndis.gov.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Martin Hoffman", is located below the text "Yours sincerely". The signature is fluid and cursive.

Martin Hoffman
Chief Executive Officer
National Disability Insurance Agency

25 June 2020

Attachment B—NDIA RESPONSE TO RECOMMENDATIONS

<p>Recommendation 1</p> <p>The NDIA implement an internal end-to-end process for handling and assessing assistive technology requests. The process should:</p> <ul style="list-style-type: none"> a) be clearly documented in staff procedure(s) for example, standard operating procedures or other guidance documents b) be consistent with information the NDIA makes publicly available about assistive technology requests, and c) include a quality assurance step to monitor compliance with policies and to identify any gaps in staff training. 	<p>Agree</p>	<p><u>Recommendation 1 a)</u></p> <p>The NDIA is updating its suite of Standard Operational Procedures (SOPS) which will be released in June 2020 outlining the current end to end Assistive Technology (AT) process. This will also be supported by the development of a new Assistive Technology Operational Guideline (OG) developed as part of an OG Refresh project expected to be released in Q1 FY21.</p> <p><u>Recommendation 1 b)</u></p> <p>The OG Refresh project will result in the publication of all Operational Guidelines externally including AT which will be part of the first release. This will see both NDIA decision makers and participants have the same information about how the NDIA makes decisions about funding AT supports as part of the NDIA’s approach to improve transparency in decision making.</p> <p><u>Recommendation 1 c)</u></p> <p>A quality assurance step will be developed in the pre plan approval stage (in the Agency’s Planning Assurance Team) and post approval in targeted Quality audits. It is expected that this will be implemented by December 2020.</p>
<p>Recommendation 2</p> <p>The NDIA implement a single national participant (or client) records management system that allows staff to store, manage and retrieve all information relating to individual participants, including information about current plans, approved supports, scheduled plan reviews and any contacts the participant has made with the agency.</p> <p>Noting there are frequently long lead times for implementing IT solutions, we recommend that in the meantime, the NDIA:</p> <ul style="list-style-type: none"> a) establish and resource a central coordination process to efficiently identify and consolidate incoming 	<p>Agree</p>	<p>The NDIA is embarking on a new Customer Record Management (CRM) system build where the scope includes recommendation 2 and will be built over the next two years. Recommendation 2a and 2b have been implemented and the new CRM system will bring further improvements.</p> <p><u>Recommendation 2 a)</u></p> <p>The NDIA has developed and implemented a new process following the investigation where incoming communications are routed to a single source – the National Call Centre and documented in the CRM.</p> <p><u>Recommendation 2b)</u></p> <p>The NDIA can confirm all regional AT email inboxes have been closed. The National Contact Centre is the central channel for consolidating all incoming communication with participants.</p>

<p>communications received from various channels into a central client record location, and</p> <p>b) close and consolidate its regional email inboxes into a central inbox</p>		
<p>Recommendation 3</p> <p>The NDIA ensure requests for assistive technology are not missed if staff are on leave or have left the NDIA by:</p> <p>a) including a workload management function in its new participant records management system (see recommendation 2), and</p> <p>b) implementing a workload management process to proactively reallocate or reassign work in real time, depending on the availability and caseloads of staff</p>	<p>Agree</p>	<p><u>Recommendation 3 a)</u></p> <p>The new CRM system will have full workflow management capability and full visibility for the Participant and the Agency with real time status of all AT requests.</p> <p><u>Recommendation 3 b)</u></p> <p>Workload allocation is currently manually performed through a combination of reporting and reallocation of work for AT requests that are approaching the SLA timeframes.</p>
<p>Recommendation 4</p> <p>To improve consistency and accuracy, the NDIA implement a fit for purpose knowledge management system to support staff to easily access guidance and procedures in a central location.</p> <p>In the meantime, the NDIA should improve navigability of existing guidance documentation, for example by improving length, clarity and narrative coherence of available guidance, and reducing links to separate documents and guidance.</p>	<p>Agree</p>	<p>The NDIA is currently scoping requirements for a new knowledge management system for the housing and publishing of guidance documentation. Detailed user needs and requirements are currently in development, with a key element to ensure integration with the new CRM and the Agency’s future digital strategy.</p> <p>Existing guidance material by way of Standard Operating Procedures have been refreshed and will be released in July. These have improved readability, navigation, consistency and clarity for frontline users.</p> <p>In addition a new Operational Guideline on AT will be released in Q1 FY21 also with improved readability, navigation, findability, transparency and written with a participant centred approach.</p>
<p>Recommendation 5</p>	<p>Agree</p>	<p>The NDIA is currently establishing a panel of service providers to undertake independent functional capacity assessments on behalf of the Agency. These assessments will help to inform access and plan budget decisions, commencing in the 2020/21 year. It is intended that an Assistive Technology support needs assessment be added to</p>

<p>The NDIA, informed by the evaluation of the specialised services assessment panel pilot, implement a process to assist participants to identify assistive technology supports at preplanning, to ensure their inclusion in plans at the earliest opportunity. The NDIA should update staff guidance and procedures to reflect the new process and provide information about the process to participants, for example, in the Participant booklet and/or on the website.</p>		<p>the scope of the independent assessment arrangements in a second phase, however the timing of this phase has not been determined as the COVID-19 pandemic has delayed the initial implementation of the independent assessments.</p> <p>The NDIA will also update guidance and procedures through the Operational Guideline project and will publish all Operational Guideline’s externally including Assistive Technology which will be part of the first release.</p>
<p>Recommendation 6</p> <p>To help participants gather and prepare information for their planning meeting, the NDIA should provide clear information about the assessment and/or quote requirements for commonly requested assistive technology supports. This information could be included in the Participant booklets or on the assistive technology page for participants on the NDIA’s website, with a reference to the website in the Participant booklet.</p>	<p>Agree</p>	<p>The NDIA supports this recommendation and is in the process of developing new Operating Guideline that will be published externally and will include the process and expectations around Assistive Technology (AT). Information is included about the types of evidence which may be required to support AT requests as well as the requirements for quotes for AT items. This will be published in Q1 FY21 and will be published to the NDIA website.</p>
<p>Recommendation 7</p> <p>The NDIA amend its assistive technology and plan approval processes, to include a step at the conclusion of the planning meeting to invite participants to provide any outstanding/additional documents to support their assistive technology request, within a specified timeframe, prior to approving the plan.</p>	<p>Disagree</p>	<p>The NDIA believes that delaying the approval of a plan has broader impacts on the delivery of a participants supports in that plan. While this may provide motivation for the participant to complete relevant AT requirements the NDIA does not feel this is appropriate improvement to the participant experience.</p> <p>During the COVID-19 pandemic the NDIA introduced greater flexibility in plan reviews and making changes to plans. This has proven to be a valuable improvement to the Participant experience that the NDIA is looking to maintain. The benefit has been far greater responsiveness from the NDIA to make minor amendments to a plan, including post plan approval AT changes that meet the “Reasonable and Necessary” criteria.</p>
<p>Recommendation 8</p>	<p>Agree</p>	<p>The NDIA supports this recommendation and is in the process of developing new Operating Guideline (OG) that will now include further detail on the process of having AT included in their plan.</p>

<p>The NDIA should explain to participants the process for having assistive technology included in their plan, either at the planning meeting or at plan implementation, if a participant is unable to provide the information required to support an assistive technology request before the plan is approved.</p> <p>This requirement should be supported by:</p> <ul style="list-style-type: none"> a) clear instructions in the NDIA’s guidance to staff about the need to provide participants with information about the assistive technology approval process, and b) written information for participants about the assistive technology process, e.g. in the form of a fact sheet, update to the Participant booklet and/or on the website. 		<p><u>Recommendation 8 a)</u></p> <p>We will provide clear instructions in the NDIA’s guidance to staff about the need to provide Participants with information about the assistive technology approval process through the suite of Standard Operational Procedures (SOPs) and through the new OG.</p> <p><u>Recommendation 8 b)</u></p> <p>We will provide written information for participants about the assistive technology process (e.g. in the form of a fact sheet) and details on the website and detailed in the Operational Guidelines which will outline how we make decisions about funding AT supports. This will be published in Q1 FY21.</p>
<p>Recommendation 9</p> <p>The NDIA provide information to support staff to explain to participants:</p> <ul style="list-style-type: none"> a) that where a plan is in place, a subsequent decision not to include requested supports in the plan is a reviewable decision, and b) the steps to take if a participant disagrees with that decision, including advising participants of their review rights and sending a written notice confirming the decision and their review rights 	<p>Agree</p>	<p><u>Recommendation 9 a)</u></p> <p>The Tune review has changes proposed (s47) that are aligned to the intent of this recommendation. The NDIA agrees with the recommendation, noting that we are constrained by the implementation of the Tune Review legislation changes that have been delayed due to the COVID-19 pandemic.</p> <p>The future state legislation change will allow the NDIA to review a plan and make a decision on a single support, with the Participant having subsequent review rights to that specific decision.</p> <p><u>Recommendation 9 b)</u></p> <p>This process is already in place and will be further updated as part of the Agency’s Operational Guideline (OG) Refresh Project, with an updated OG on Reviewing your plan which outlines the steps required to seek a review, review rights, process and expectations.</p>
<p>Recommendation 10</p>	<p>Agree</p>	<p>The Tune Review and subsequent legislation change includes a Participant Service Guarantee covering all key service delivery standards. Assistive Technology will be included in the guarantee.</p>

<p>The NDIA publish on its website its service standards for responding to assistive technology requests.</p>		<p>In addition, the OG project will externally release the service standards for AT in the documentation that will be provided externally and will occur in Q1 FY21.</p>
<p>Recommendation 11</p> <p>The NDIA should amend its assistive technology processes, to require staff to acknowledge receipt of complex assistive technology requests within 10 working days. The acknowledgement should let the participant know whether any further information is required.</p>	<p>Disagree</p>	<p>The NDIA has implemented an acknowledgement receipt with the new process routing incoming communications to the National Contact Centre. This meets the first element of the recommendation.</p> <p>The second element of the recommendation refers to confirming that no further information is required to progress the decision. In order to achieve this, the NDIA would need to conduct a significant quality check of the documentation within the 10 day timeframe. The NDIA recognises the value in the recommendation but feel this would essentially give effect to a 10 day turnaround for approving complex AT, which is not supported. The NDIA will endeavour to explore capability in its new CRM to quickly assess Assistive Technology with a simpler process for requesting complex and non-standard items.</p>
<p>Recommendation 12</p> <p>The NDIA develop guidance for complaint handling and frontline staff to respond to assistive technology enquiries by:</p> <ul style="list-style-type: none"> a) providing participants with the status and timeframe of a request, and b) escalating the participant’s request if it meets the circumstances outlined in the NDIA’s internal prioritisation matrix for triaging complaints. 	<p>Agree</p>	<p><u>Recommendation 12 a)</u></p> <p>Some staff guidance material is currently available for frontline staff and includes some scripting for staff when discussing requests for assistive technology. Complaint Handling staff also have existing timeframes and processes for handling assistive technology complaints. It is anticipated with the introduction of the Participant Service Guarantee further clarity will be provided for providing participants with the expected timeframes for requests.</p> <p>Further work will be undertaken to clarify guidance material for both complaints handling and frontline staff to communicate status and timeframe expectations for assistive technology enquiries and it is expected that this will be available by 31 December 2020.</p> <p><u>Recommendation 12 b)</u></p> <p>Complaints handling staff currently use the prioritisation matrix to triage all complaints including complaints about assistive technology to support escalation of the request if it meets the relevant risk criteria. The use of the prioritisation matrix for triaging enquiries by frontline staff will be reviewed and an escalation process put in place by 31 December 2020.</p>
<p>Recommendation 13</p> <p>The NDIA should implement an ongoing and regular process to analyse assistive technology complaints and use the data collected to inform improvements to its administrative</p>	<p>Agree</p>	<p>The NDIA implemented a system enhancement for complaints in October 2019 enabling complaints to be categorised at three levels including identifying complaints about assistive technology. Monthly reporting on more detailed complaint themes is now in place including Ministerial complaints and complaints referred or investigated by the Office of the Commonwealth Ombudsman. The Complaints Team will establish monthly meetings with the Assistive Technology team and provide monthly reporting on complaint volumes and themes regarding assistive</p>

<p>processes and information provided to participants about assistive technology.</p>		<p>technology. Qualitative analysis of these complaints will be undertaken quarterly to identify improvements to administrative processes and information provided to participants about assistive technology.</p>
<p>Recommendation 14</p> <p>The NDIA measure the average time it takes to decide an assistive technology request in order to calculate its capacity to meet anticipated demand for assistive technology within its service standards.</p>	<p>Agree</p>	<p>The NDIA measures the incoming AT requests and the timeframes for processing. These are measured against the current timeframe commitments of 10 days for simple requests and 30 days for complex requests. Workforce planning sees the resourcing in the central overflow team aligned to the incoming volumes to manage to SLA's.</p>
