



Leap in! Submission

to Queensland Productivity Commission

NDIS Market Inquiry

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Submission by:

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Purpose:

This document is Leap in! Australia's response to the Queensland Productivity Commission's June 2020 Issues Paper - Inquiry into the National Disability Insurance Scheme market in Queensland.

Summary

Leap in! submission key messages:

1. Plan Management is a key function of the Scheme offering Participants a happy balance of greater choice and control through the use of registered and non-registered providers, with the safety net of an accountable administrator of finances. As the plan management market has developed, the role has evolved from that of book-keeper to management accountant/ plan advisor, with the majority of participant support oriented around planning, budget management and understanding how to navigate the Scheme. With 43% of new plans in Queensland issued in Q3 being nominated for Plan Management, the value of the function is translating directly into consumer demand.
2. From the outset of the Scheme there has been little market direction provided by the NDIA regarding the role of Plan Managers and Financial Intermediaries. While there has been sufficient policy and regulatory certainty to encourage early market investment and development, we are now at a point of market evolution where plan managers and intermediaries require a statement on future direction to ensure continued investment.
3. Plan Managers are in a unique position to have a whole view of participants financial and service arrangements (generally). This creates scope to play a key role in understanding and influencing drivers of under-utilisation. In addition the access to both registered and unregistered providers enables greater service connections particularly within thin or remote/very remote markets.
4. In some circumstances Agency management limits the options available to participants. There is an opportunity for the Queensland Government to lead discussions and education about the availability of self and plan management for participants under arrangements with statutory bodies including the Office of the Public Guardian and Public Trustee. This will close a gap and ensure all participants are afforded the choice, control and personalised outcomes offered by the Scheme.

Leap in! Australia - NDIS Plan Manager

Leap in! is a NDIS registered Plan Manager and Financial Intermediary. It was formed as a joint venture between UnitingCare Queensland and Uniting NSW.ACT, who have been two of Australia's largest disability, health and human services providers for more than 70 years. Leap in! is an ACNC registered charity.

Leap in! is a unique Queensland success story. It has grown rapidly to set the national benchmark for what NDIS participants should expect from a plan manager. As well, Leap in! is a showcase example of the drivers behind Advance Queensland -- Innovation, Investment in Growth Sectors, University Collaboration, Jobs Creation. The Uniting Church and and Uniting's care organisations have invested more than \$10 million in the creation and development of Leap in! The organisation supports 40 jobs (and rapidly growing), sponsors technology research and development initiatives with QUT and has developed a globally leading technology platform that sets NDIS participants up to be able to live their best lives while removing complex Scheme administrative burdens.

Leap in! was established in October 2017, started offering plan management services in August 2018 and is headquartered in Brisbane, Queensland. Leap in! is the authorised plan manager for ~4500 NDIS participants nationally and grew 220% over the past year. In Queensland, Leap in! supports ~3200 participants and their families from Cairns to Coolangatta.

The Leap in! mission is to:

- Enrich the lives of people with a disability, enabling them to live their best life.
- Help make the NDIS successful by leveraging technology and innovation.
- Assist customers to navigate the NDIS and become a trusted partner.

Through our people, digital applications and content channels we support customers to take control of their NDIS experience by delivering:

- Australia's leading NDIS plan management service;
- A wide array of NDIS planning and budget related information and advice;
- Best practice digital tools that assist Participants with Plan creation and tracking as well as real time visibility of budgets, claims and payments; and
- Data based pro-active recommendations to participants relating to achieving their goals, budget utilisation and facilitation of provider connections.

For providers we make it easy to submit claims, be paid quickly, promote their services to Participants and get referral connections from Leap in! for participants we know are in their local areas and who need the services they offer.

Leap in! -- Scheme navigator and trusted advisor

Leap in! operates Australia's only vertically integrated, person centred / multi-party plan and budget management technology platform for NDIS Participants. It is delivered across iOS, Android and desktop web environments and supported by a Brisbane based contact centre. More than 18,000 NDIS participants, their family and support crew nationally are active users of the platform which Leap in! offers as a free service. The platform has been white labelled and runs versions under UnitingCare Queensland, Uniting and BlueCare brands.

For many people with disability and their families, the NDIS can be seen as a complex and intimidating system with many levels to understand. And while, with experience participants attain increasing levels of

understanding and engagement with each year of experience, in order for an individual to fully leverage the scheme to achieve their goals and live their best life, there is a lot of work and effort required. More than 30,000 participants, family, support workers and providers have signed up for Leap in!'s free information and advice newsletters, e-books and help line.

The role and value of Plan Managers

When the Scheme was designed the role of Plan Manager and Financial Intermediary was created. The intention was for the role to assist facilitate two of the underpinning tenants of the NDIS -- Choice & Control and Reasonable & Necessary Supports. Plan Managers were established as a function that would allow people to have greater choice and control over the providers they chose to deliver their supports versus the default NDIA (Agency) managed scenario but not absolute control over how much they could pay for supports, as exists for people who elect to self manage.

The functional mechanism that Plan Managers would fulfil (and be remunerated for by the NDIA) was to act as book-keepers for Participants, facilitating provider invoices/ claims to the NDIA and approved payments, and to help Participants stay on top of their remaining budget balances for different support categories. In keeping with the foundation values of the Scheme, the right of a participant to choose to manage their plan with the support of a Plan Manager was legislated. It is the only support type under the scheme where this right of support access was guaranteed.

The original Productivity Commission report that the Scheme economics were based on forecast an end state situation where approximately one-third of Participants would each select Agency Managed, Plan Managed and Self Managed. In the last NDIA Quarterly Survey (Q3, 2019-20) 38% of Participants had elected to use a plan manager Nationally and in Q3 43% of new plans were issued with a plan manager. In Queensland, 41% of Participants have elected to use a plan manager and during Q3 47% of new plans were issued with a plan manager.

The ever growing popularity and choice by Participants to use a plan manager is evidence of the value this group of providers bring to the sector.

It is also worth noting that on top of the total of fully Plan Managed Participants, 11% of Queensland Participants have mixed plans with a component partially Self-Managed and plan managed. In this situation it is common for the Participant to elect to self-manage a portion of their funding and elect to have a plan manager support the remainder.

As the NDIS has rolled out, and in the absence of policy guidance or market development direction on the role of plan managers, the developing sector has increasingly taken upon itself to meet Participant needs and evolve the role to become more like management accountant advisors than bookkeepers. Leap in! is at the forefront of setting product and service benchmarks for Plan Management nationally.

As a Plan Manager Leap in! proactively supports participants with:

- Pre-planning required for their annual NDIA meeting;
- Tracking progress towards plan implementation and goal achievement;
- Explaining to customers their budgets and what supports they can be used for and current NDIA eligibility policies (that regularly change);
- Identifying where they are over/ under-spending budgets and making recommendations for how they can optimise support levels to fully utilise their funding;

- If a participant is looking to find or change their provider(choice and control), identify providers in their local area that Leap in! knows are already providing the required support type and connecting the participant with the provider;
- Working closely with Supports Coordinators (where a Participant has this support in their budget) to enhance the Support Coordinators effectiveness by adding access to real time financial information, and Leap in! knowledge and resources; and
- Educating providers on the eligibility for different products and services, allowable pricing and NDIA policy changes that may impact them.

In summary, facilitating the basic book-keeping requirement of plan management is an increasingly small part of what Leap in! does. More than 90% of the reasons a Participant contacts Leap in! relate to assistance with system navigation, plan implementation, supports connection and budget advice. As the level of automation and straight through invoice processing increases over the coming years, it will be important that these additional supports delivered by larger plan managers like Leap in! are recognised and allowed for within policy remit and remuneration settings.

NDIS Market Conditions

Queensland commenced roll out of the National Disability Insurance Scheme in 2016. The commencement of full implementation was the first instance of NDIS support experienced by Queensland residents as the state had no trial sites or cohorts. This resulted in Queensland having a slightly delayed roll out in comparison to other states (excluding Western Australia).

Of the anticipated 91,000 NDIS participants only around 53% received funded support prior to scheme implementation, meaning 47% of participants were expected to be new consumers. In line with this early modelling, as of March 2020, 41.5% of active participants identified as receiving support for the first time. This means the Queensland market has been required to grow significantly to meet demand. Since many of these participants and potential participants reside in remote and very remote communities Queensland needs to lead in the development of market approaches which support innovative local responses where support need is unable to be met through the registered provider market.

The NDIA's approach to market development seeks to expand market supply to ensure sufficient access to support is available to participants. Plan management plays a critical function in this strategy allowing participants to access supports from both registered and unregistered providers. Without access to unregistered providers the scheme would not meet demand. Gaps are being met by increased representation of sole traders and Small Medium Enterprises (SME's). Leap in! Supports a significant number of regional and remote NDIA participants enabling plan outcomes through design of local support arrangements. For example in Walgett NSW which has 52 NDIS participants L! is Plan Manager for 33.

Thin markets exist in remote, very remote and regional areas, especially for some specialised services. In many cases this thinness is a result of low participant numbers. It is critical however, that Queensland residents are not penalised and unable to benefit fully from the Scheme due to low density. In these areas the NDIA is unlikely to be able to attract registered providers and therefore requires the participants and their local communities to collectively meet needs through individualised purchasing arrangements. Plan Management supports this by creating mechanisms to access non registered supports without needing to be in a position to fully self manage. It also affords these participants the opportunity to benefit from additional support and guidance in the establishment of these arrangements. With only a portion of participants having access to Support Coordination

and the time limited nature of that support, Plan Management fills a need for consistent, stable, ongoing assistance across multi-plan periods.

Structure, regulatory and other impediments (including price controls)

In the Disability Intermediaries Australia (DIA) State of the Sector 2020 report they noted that only 5% of intermediary providers agreed with the statement that *'The NDIA is working well with Plan Management and Support Coordination providers to implement the NDIS'*. Only 2% agreed that the NDIS system and processes were working well, while 59% agreed that there are too many unnecessary processes, rules and regulations.

The current regulatory and operational environment for plan management is open to differing interpretation and lacks practical guidance on expectations of the function and individual plan management providers. This results in:

- Confusion about the role
- Significant variation in participant and provider experiences of plan management
- Uncertainty about the future direction of Plan Management

This lack of clarity and direction induces slowing innovation and investment with providers becoming disenfranchised and lacking confidence in the NDIA's commitment to the function within the scheme.

We advocate that the NDIA prioritises the delivery of a Plan Management Framework and Guidelines, that delivers clarity and certainty around regulation, operational and technology matters going forward. This would evidence an engaged 'no surprises' partnership approach to the sector.

We further advocate the NDIA:

- Recognise the uniqueness of intermediary roles in assisting Participants prepare and implement their Plans and support appropriate access for accredited providers to have greater Participant plan visibility of NDIA held information.
- Take active steps to remove friction and confusion with the Scheme. Simplify systems, processes, rules and procedures for both participants and providers.
- Be transparent in details of the pricing framework including 'hidden price caps', dates of decommissioning for ended line items and planned changes.

The NDIA has an outsourced planning and customer service model which places third party LAC's (Local Area Coordinators) and other partners between stakeholders (including participants and providers) and accountable NDIA representatives. This means the people offered as key contacts for Participants:

- often have varied knowledge and authority;
- are not decision makers;
- are typically unable to provide clear, consistent direction or advice on planning, budget management, support type eligibility or provider connection; and
- are not authorised to make decisions or enact any effective action on the participant or providers behalf.

This 'outside' circle results in significant time delays, inefficiencies, inconsistency and distress, particularly for Agency managed Participants. The fact that plan managers such as Leap in! plug many of these gaps is one reason why close to half of all participants in Queensland are electing to manage their plan with the support of a Plan Manager.

Navigating the scheme

The success of the NDIS is predicated on participants fulfilling the active role of consumer. Their selection of supports and services will drive demand, with the market responding to their indicators for service preference, volume and delivery mechanisms. This, in turn, is anticipated to achieve improved individual and community outcomes; whilst shaping economic efficiencies. Participants ability to effectively play the role of consumer is impeded by their ability to understand and navigate the scheme.

The scheme is complex and evolving. Updates to policy positions, price controls and funding approaches is constantly changing. For example the NDIA has released > five (5) updated price guides over the last 6 months. Flexibility for the scheme to change, mature and respond to emergent events is critical; however it comes at the cost of complexity. The role of guides, navigators and intermediaries therefore is crucial.

Intermediary providers play a key role in:

- Supporting participants to better understand the scheme, rules and guidelines
- Updating participants on changes to policy, rules and guidelines
- Supporting participants to articulate and demonstrate their needs to attain reasonable and necessary funding allocations
- Sourcing and connecting to providers; and
- Facilitating administrative functions including budget management and provider invoice processing/ payment.

Due to their social justice commitment providers continue to over-service and fill systemic gaps in the scheme. To date the NDIA has relied on providers, including intermediaries, to fulfil these functions in-kind with no or limited remuneration. As this continues over a number of years the scheme and participant outcomes are at real risk of decline should providers cease these extended offerings.

During the 2020/21 Annual Price Review, Plan Management providers put forward significant evidence of:

- The complexity and cost associated with working within the scheme;
- The systemic limitations which increase this burden explicitly on plan managers (including service booking administration, price guide/plan updates and lack of information sharing by the NDIA); and
- The additional functions being undertaken by this intermediary cohort (including building participant capacity to navigate and understand the scheme).

The NDIA did not consider any of the cost modelling by function and failed to support any increase in price controls to compensate for costs of delivering expected services via their systems and processes. The reasoning provided for this decision was analysis that the market is currently not at risk as sufficient providers remain registered. Without (a) acknowledgement by the NDIA for the increasing costs and reducing margins that are associated with delivering basic plan management and (b) policy direction and assurance on the medium to longer term role of plan managers and intermediaries under the Scheme, larger providers such as Leap in! are likely to redirect their investment in the sector to adjacent categories such as aged care, life insurance and private health where the market needs are the same but the policy and regulatory structures are more stable. The impact of such a redirection of significant levels of private capital will be on lower services and support for Participants.

Leap in! supports the NDIA's approach to setting price controls to help shape the market and ensure stewardship; however the mechanism for review of these controls is flawed and places some key support functions, including plan management at risk.

Plan Managers Key to Engagement and Utilisation

While the NDIA has almost completed the rollout process for the NDIS, there is still a significant way to go to achieve participation, engagement and budget utilisation goals. As identified in the QPC Issues paper, budget utilisation is a fundamental requirement to people achieving goals and successful realisation of the original NDIS vision.

Considering we are several years into the scheme, the utilisation of approved budgets is much lower than should be expected -- ~60% nationally and sub-50% within key segments such as regional/remote, indigenous communities, people 18 to 25 years old (Q3 2019-20 NDIA Quarterly Report). This is a national trend and based on Leap in!'s experience has much to do with:

- (a) the support people receive to get them started with implementing their plan;
- (b) the challenge of finding providers locally who can deliver newly funded supports that the participant has never had before and who have capacity; and
- (c) how hard it is for participants to stay on top of budgets, spend commitments and remaining budget balances.

Effective plan utilisation requires a number of critical factors to be in place. The Participant must be able to:

- Present goals and needs in such a way to the NDIA Planner or LAC to achieve the correct allocation of funds in the correct support categories;
- Understand the plan and purchasing options available to them;
- Source and connect to providers who can meet their purchasing requests; and
- Budget, plan and draw down on plan funds with ease.

As at March 2020 the average plan utilisation in Queensland was 67%. This indicates one or several of the following issues are impacting plan use:

- Participants do not understand how to use their plan or need more support to action implementation;
- Participant plans are not aligned with funding needs; and/or
- Insufficient service delivery options are available for the Participant to access.

As the Commission is aware NDIS plans have constraints in their structure which limit how funds are allocated and must be used. Although each plan has a total funded amount, it is apportioned across the possible 15 support categories. Similar to the structure of private health insurance, NDIS Plan funds can be spent only up to the unique allocation per category for the categories intended purpose. This means participants may have funds within their plan, but are unable to access them if they sit in a category which is not aligned to their identified 'best fit' need. The NDIA has published their intent to increase plan flexibility, but no confirmation of timing or associated mechanisms have been shared.

As the only type of support provider with overall visibility of a Participant's budget (in most situations), plan managers are ideally positioned to advise Participants on matters relating to implementation of their plan and maximising budget utilisation for appropriate purpose.

Leap in!'s person centred - multi-party approach facilitates the different stakeholders within a person's circle of support to both contribute to planning and budgeting processes as well as stay connected as the Participant goes about implementing their plan. When augmented with progress conversations with Leap in! Plan Manager's and our unique NDIS Budget Health Check statements, Participants have all the right tools and access to supports, to navigate their way to successful plan implementation each year. They also maintain choice and

control over 'who' has access to their personal plan information and access level that each circle of support member maintains.

Leap in!'s increasing focus is on how to facilitate plan goal achievement and budget utilisation. Our technology platform is globally unique in the way it allows Participants to manage both goals-supports planning and implementation as well as budget management from a single app interface. It also allows Participants to invite supports workers, providers, health professionals and family members to have varying levels of visibility and access to their profile. Increasingly we are applying data analytics and machine learning algorithms to analyse plans, budgets, providers, geo-trends and spend behaviours to make recommendations for both Participants and providers on how to track and review plan progress, access supports, identify thin markets and implement plans.

Confusion regarding Public Guardian and Public Trustee NDIS Participant eligibility for Plan Management

Leap in! has a handful of NDIS Participant customers who have a relationship with the Public Guardian or Public Trustee in Queensland. This situation is common with other states. The concern is that people in these situations are at a disadvantage compared to other Participants and are not being afforded the same opportunities to exercise choice and control over their support providers. Moreover, in regional and remote Queensland communities where there are thin service markets, being Agency managed will limit access to providers who are not registered with the scheme (eg. common for ancillary health services).

There is an opportunity for both the Public Guardian and Public Trustee to engage with plan managers. We have noted that some participants and their supported decision makers are not made aware of this option. In particular those under Public Guardianship, Department of Child Safety and other statutory agencies often report an incorrect belief that NDIS plans must be managed by the Agency (NDIA). As a result, this already marginalised community is placed at greater disadvantage, and unnecessarily limited in their ability to achieve the true intent and potential of the scheme.

We would ask the Queensland Government and Productivity Commission to engage with these statutory authorities to develop clearer communications for Participants and stakeholders and to encourage, where appropriate, supporting decision makers to explore plan management and self management options.

APPENDIX

Queensland Productivity Commission Questions

Leap in! has provided inputs on a range of questions asked within the terms of reference based on our NDIS market experience over the past 3 years as a registered Plan Manager and Financial Intermediary with the majority of our customer base in Queensland.

For ease, we have captured the QPC headline area of investigation and communicated our perspective in a Q&A format.

Meeting the needs of Participants

Question	Answer
What measures best demonstrate whether the NDIS is meeting Queensland participants' needs effectively and efficiently?	While there is increasing reporting around Participant satisfaction with the NDIA and planning process, there is no reported information that correlates Agreed Plans, Goals and Budgets with outcomes. Similarly, there is no reporting that correlates how continuity of plans, goals and budgets work across multiple planning periods.
Does the NDIS provide Queensland participants with enough choice and control over the supports they receive? If not, what factors are constraining the ability of participants to exercise choice and control	The NDIS framework provides participants with enough choice and control over supports through the various mechanisms of plan management - Agency, Plan Manager and Self-Managed. The primary gaps in the participant's ability to exercise choice and control a generally the result of: <ul style="list-style-type: none">a) Flexibility across support categories (budgets)b) Appropriate information and education to Participants and nominees on the options for plan management;c) Not having a proactive approach in regional and remote communities and other thin markets for partnering participants with plan managers and supports coordinators to identify non-registered providers who can help with plan implementation and supports delivery. In these areas there are not sufficient registered providers to facilitate effective plan implementation and budget utilisation; andd) Situations where the participant is under the guardianship of the Public Trustee or Public Guardian, people within the circle of support and nominees are often unaware of the option of participants to utilise a plan manager.
Is there enough guidance about how the NDIA determines the supports that it funds to meet participants' needs?	No. Allocation of funds is made in line with a 'Reasonable and Necessary' determination. Participants report being confused by what constitutes 'Reasonable and Necessary', getting differing advice depending on which NDIA representative or community partner they are in contact with. The NDIA should make public the Reference Packages which support the allocation and approval of plans.
Have outcomes for Queensland people with a disability improved since the adoption of the NDIS?	It is too early to tell. Every week Leap in! receives feedback from participants and their families of the positive difference the NDIS is making. Without question, the average funding participants receive and the breadth of supports funded (core, capital and capacity building) is a step forward and able to be well utilised by those who have the right support to navigate the complexity of rules governing expenditure.

	<p>Based on the average 18 calls per customer Leap in! received last year with questions on how the NDIS works, how to use their budgets and to find support providers we can confidently assert that a large portion of registered participants are still trying to understand how the new system operates and what they need to do to comply with its policies and rules.</p>
<p>Will the ability of the NDIS to meet participants' needs improve as the scheme is in place for longer?</p>	<p>As with other complex services categories in Australia (eg. financial services, health insurance, utilities, telecommunications, aged care) consumers often find it difficult to navigate the myriad of provider product/ service choices, value and rules/ terms and conditions that govern their use.</p> <p>The NDIS is no different. Leap in! was established in recognition that over the long term Participants will continue to need an independent third party that can assist them with Scheme navigation and identifying providers who can help them implement their Plans.</p> <p>Given the scale of the Scheme and the number of people whose plans are managed by the Agency supported by its LAC partners it would be unrealistic to expect that the NDIA could cost effectively deliver individualised plan implementation and provider selection advice.</p> <p>There is a need for the NDIS to ensure that the longer term role of plan managers and supports coordinators who increasingly fill this role, is retained.</p>

Plan Utilisation

Question	Answer
<p>Are the plans that are being developed fit-for-purpose, and funded to deliver efficient supports to meet participants' needs?</p>	<p>It is our understanding that the modelling for the Scheme considers short term investment for long term outcomes and overarching efficiency. This approach appears to be at odds with measures of short term efficiency being attempted.</p> <p>It is likely that it is too early in the scheme and the transition for participants into the role of active consumer to assess this.</p>
<p>What are the reasons for the underutilisation of approved plan budgets?</p>	<p>Considering we are several years into the scheme, the utilisation of approved budgets is much lower than should be expected -- ~60% nationally and sub-50% within key segments such as regional/remote, indigenous communities, people 18 to 25 years old (Q3 2019-20 NDIA Quarterly Report). This is a national trend and based on Leap in!'s experience has much to do with:</p> <p>(a) the support people receive to get them started with implementing their plan;</p> <p>(b) the challenge of finding providers locally who can deliver newly funded supports that the participant has never had before and who have capacity; and</p> <p>(c) how easy it is to stay on top of budgets, spend commitments and remaining budget balances.</p> <p>Effective plan utilisation requires a number of critical factors to be in place. The Participant must be able to:</p>

	<ul style="list-style-type: none"> ● Present goals and needs in such as way to the NDIA Planner or LAC to achieve the correct allocation of funds in the correct support categories. ● Understand the plan and purchasing options available to them ● Source and connect to providers who can meet their purchasing requests ● Budget, plan and draw down on plan funds with ease <p>As at March 2020 the average plan utilisation in Queensland was 67%. This indicates one of the following issues are impacting plan use:</p> <ul style="list-style-type: none"> ● Participants do not understand how to use their plan or need more support to action implementation; ● Participant plans are not aligned with funding needs; and/or ● Insufficient service delivery options are available for the Participant to access. <p>As the Commission is aware NDIS plans have constraints in their structure which limit how funds are allocated and must be used. Although each plan has a total funded amount, it is apportioned across the possible 15 support categories. Similar to the structure of private health insurance, NDIS Plan funds can be spent only up to the unique allocation per category for the categories intended purpose. This means participants may have funds within their plan, but are unable to access them if they sit in a category which is not aligned to their identified 'best fit' need. The NDIA has published their intent to increase plan flexibility, but no confirmation of timing or associated mechanisms have been shared.</p>
<p>Is price regulation a cause of supply shortfalls?</p>	<p>Not applicable to the Plan Management category. However if policy/ price settings were to change for plan management it is likely that there would be major capacity reduction by current providers as the category would quickly become unviable.</p>
<p>Is underutilisation of plans likely to diminish over time?</p>	<p>Not without participants being able to access advice (funded by the Scheme) on how to go about preparing appropriate needs based plans and implementing those plans within allowable budgets and categories of expenditure.</p> <p>Previously in our response we drew the analogy to private health insurance (PHI). Holders of PHI 'Extras' cover have annual entitlements to a range of services (eg. preventative dental, optical checks and glasses, massages, physio, chiro). Very few users ever come close to utilising their available services coverage even if they need it. Why? Difficulty of understanding coverage, what's been spent, what's still available, finding local providers who are in the insurers no-gap networks and the effort it personally takes to take full advantage of coverage are a few common reasons.</p> <p>The NDIS is the same as PHI but (a) much more complex and intensive to navigate (b) has a high proportion of participants who live in marginal circumstances and (c) where this may be the first time participants have had an opportunity to assert choice and control over service provision and product choices. Given these considerations we would not reasonably expect NDIS participants to be able to fully utilise allocated funding without support. We would also note that this is not any reflection upon Participants -- Leap in! would assert that any mainstream</p>

	<p>program that operated under the same conditions would have significant under utilisation.</p>
<p>What are the consequences of underutilisation?</p>	<p>Leap in! sees two primary consequences:</p> <ol style="list-style-type: none"> 1) People don't end up achieving their goals and being able to live their best life. Moreover, there is a risk that if not handled appropriately the opposite may occur and participants become discouraged from pursuing goals and ambitions. For the scheme to work we need Participants to be supported to grow and experience achievement of their Plans and not discouraged by setbacks. 2) The risk of a 'use it or lose it' culture (perceived or real) evolving around the annual plan review and new plan/ budget establishment process. The greater the transparency and continuity of planning and budgets across periods combined with clear frameworks for equitable determination of funding the greater confidence participants will have in the system and fit-for-purpose decisioning.
<p>How do conditions around the use of support budgets affect participants' incentives to fully use their plan budgets and shop around for services?</p>	<p>In many cases underutilisation will occur within specific budget categories, not the plan as a whole. Participants report they would use the funds if they were able to be used flexibly (such as in a Home Care Package).</p>
<p>Does plan type have a bearing on budget utilisation and access to support services?</p>	<p>Yes. As previously outlined, the choice of Agency vs Plan Manager vs Self-managed can have a significant impact on utilisation.</p> <p>Agency managed can be limiting, particularly in regional and remote communities with a range of providers are unlikely to be Agency registered or have long wait lists.</p> <p>Similarly, we are increasingly seeing situations where a participant is approved for self management but may not have the capacity or circle of support to effectively fulfil the compliance obligations that come with this management option.</p> <p>Leap in! believes that the popularity of Plan Management in Queensland and nationally is because Participants are recognising that this option offers them the greatest choice and control over providers with the greatest level of system navigation and support in budgeting and plan implementation management/ advice.</p>
<p>What actions by the Australian or Queensland Governments or by the NDIA would improve plan utilisation?</p>	<p>Continued education and information to participants and stakeholders of different plan management options and the situations/ scenarios where different options (or combinations thereof) make sense.</p> <p>Improved training of NDIA staff, Partners in the Community and outsourced customer service representatives to understand the ideology of the scheme which support participant flexibility; and to speak with consistency regarding scheme policy so participants feel comfortable making decisions.</p> <p>Increased and streamlined access to plan information for intermediary partners such as Plan Managers and Support Coordination. Improved access to plan information will enhance these intermediaries' ability to support participants to navigate the Scheme and spend in line with plan build.</p>

Are the roles and responsibilities for increasing plan utilisation clearly defined and allocated?	No. At this point, the responsibility for plan implementation and related budget utilisation is attributed to the participant.
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Satisfaction with NDIA Planning Processes

Question	Answer
How well are the access, planning and review processes working in Queensland for people with disabilities and their carers?	<p>To date providers have invested huge amounts to assist eligible Participants prepare for their initial plan meetings with no compensation. This was done after evidencing (as a general rule) that the more prepared a person is going into their interview, the better their financial outcome. I.e. providers (mostly charities) took it upon themselves to make sure their NDIS eligible clients were ready as LAC's did not and do not have capacity to offer comprehensive pre-planning support.</p> <p>As yet we haven't analysed the data to see if there is a correlation between support provided in preparation for second and subsequent plans meetings and associated budget outcomes.</p> <p>The reason Leap in! developed the only digital pre-planning app nationally that can be used year after year is because of feedback we had from participants and their families regarding the effort involved in collecting all the information and supporting documents needed for the plan establishment process with the NDIA.</p> <p>Over 18,000 people across Australia have signed up and are using Leap in!'s FREE planning app.</p> <p>Challenges participants continue to report include:</p> <ul style="list-style-type: none"> ● Surprising timing of review. They budget to use their plan across the full period and then may be asked to undertake a review several months prior to plan end; or are still waiting concerningly close to plan expiration. This causes insecurity and confusion. In the case of early review often resulting in the participant and or nominee feeling unprepared. ● Administrative errors on plans are common. As there is no mechanism to simply 'update a plan' a plan review and new plan issue results from any required modification. ● Segmentation of LAC and NDIA Planner in the decision making results in a 'disconnect' between plan meeting experience and plan generation. Participants often report the final plan not aligned with their perceived discussions and LAC partners often report 'the Planner changed what I drafted'. <p>Participant initiated reviews have inconsistent, often lengthy response timeframes.</p>
How could they be improved?	<p>The NDIA could encourage participants to leverage digital platforms such as Leap in!'s for creating and tracking their plans. Leap in! has offered to interface with the NDIA so they could consume participant's plan information to make the process more efficient and improve the alignment between the market based apps participants use to create/ manage their plans and NDIA systems. It would also provide the NDIA with a far more granular view of participant goals, progress and</p>

	<p>achievements.</p> <p>The NDIA could remove the ‘outer layer’ of outsourced plan conversations and ensure participants have planning conversations with the individual who is accountable and authorised to finalise their plan.</p> <p>The NDIA can schedule a review date at time of plan issue rather than ad-hoc based on local capacity.</p>
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NDIS Market conditions and prospects

Question	Answer
What factors will shape the future demand for disability services in Queensland?	<p>Confident and empowered participants who understand (or are appropriately supported with reliable advisors) what life goals they are able to pursue with the support of the scheme and experience to assert choice and control over providers and community supports that can assist them achieve their goals.</p> <p>For providers who deliver a quality product/ service consistently and representing good value, there will be demand and regular custom.</p> <p>In short, the more mainstream the disability market becomes the greater the diversity of providers that will exist.</p>
How well placed is the NDIS to respond to these changes?	<p>The approach and timing with which the NDIS transitions to market based pricing for different supports categories is likely to have an impact on supply.</p>
Are there barriers to innovation and the capacity of the NDIS to respond to changes in market conditions?	<p>The primary incentive/ barrier to investment and innovation in the disability sector will be related to NDIA policy and price settings moving forward. For providers to invest in new products, services or platforms/ technologies for the sector there needs to be a stable policy and regulatory environment and continuity of settings over the medium to longer term.</p> <p>A number of new entrants such as Leap in!, LanternPay, Plan Partners, Mable, Mobility, Integra, PlanTracker and Five Good Friends have invested significantly in new models of support delivery and services. These entrants are focused on, and committed to, ensuring that Participants are able to fully realise the intent of the Scheme. However, their investments are also able to be deployed to a range of adjacent sectors and applications.</p> <p>Given the commercial nature of investors backing many of these players, it would be reasonable to expect that if policy and price settings were to become unpredictable or volatile, these players would change their investment and innovation focus to other sectors -- to the detriment of both Participants and the Scheme.</p>

Regulation of Prices

Question	Answers
<p>What influence does price regulation have on the supply, types and quality of services/supports you offer?</p>	<p>The structure of pricing for plan management is challenging. The plan management fee is fixed as a Stated support. This means that the fee is locked in plans and can only be drawn down as per plan set up in monthly increments.</p> <p>Leap in! supports the basic frame of fixed fees for plan management as this supports investment decisions and cashflow planning for innovation; however the stated support mechanism means:</p> <ul style="list-style-type: none"> · We are unable to claim partial monthly fees effectively when participants switch providers. · We regularly see plans set with prices from previous years (even after a new plan is issued). For example we have several participants each week (in 2020) with plans set at 18/19 financial year rates. <p>To correct plan mistakes we must spend significant time and resources to negotiate plan updates/reviews for participants or accept financial loss. When we request a plan update it has roll on consequences for participants whose plan is then reset and potentially changed. This is a scheme inefficiency caused by the NDIA administrative tools and systems.</p>

Provider Capacity

Question	Answer
<p>How are service providers adjusting to changed methods of funding?</p>	<p>Leap in! values the NDIS consumer directed funding model. It maximises consumer empowerment, choice and control and encourages providers to invest in systems and processes that facilitate operational efficiency.</p> <p>Given that Plan Management is a new support category under the Scheme, Leap in! has built its business and operating models to optimise efficiency and work within the NDIA's price caps.</p>
<p>What are the key barriers to providers increasing their capacity?</p>	<p>For Leap in!, the key barriers to increasing our capacity are:</p> <ul style="list-style-type: none"> - The levels of technical integration available with the NDIA -- although recent API's to support transaction management are heading in the right direction; and - Concern over making further investments in the sector without clear policy guidance from the NDIA on the longer term role of plan managers and intermediaries under the scheme.
<p>Do providers face stronger incentives to operate in the NDIS rather than in other sectors, or vice versa?</p>	<p>For Plan Managers the current regulatory and pricing setting have provided a level of assurance for investment decisions. This appeal has been reflected over the past 3 years in terms of market demand (growth in Participant numbers), number of new provider entrants and operational maturity of larger players.</p> <p>For committed, long term sector providers such as UnitingCare</p>

	<p>Queensland and Uniting NSW.ACT this structure offered confidence to make significant, long term investment decisions like Leap in! (which is yet to be financially sustainable).</p> <p>However the plan management sector has now reached a point of market maturity where greater regulatory and policy direction is required on how the NDIA sees the market developing.</p> <p>Without a statement on market development and associated policy and pricing direction, it could be expected that large providers will begin diverting capital to adjacent sectors that have more stable regulatory and policy direction -- aged care, private health, financial services.</p> <p>For Leap in! this would be incredibly disappointing given the potential that exists for plan managers to be part of the glue that brings the NDIS vision to life for Participants and their families.</p>
<p>What are the key barriers to entering the NDIS market for those who operate outside the NDIS?</p>	<p>None. The registration process and quality and standards framework for plan management is not onerous. This is reflected in the number of registered plan managers in Queensland (421).</p>
<p>What information gaps exist in relation to the NDIS market and providers in Queensland? How do these gaps affect the operation of NDIS markets?</p>	<p>From Leap in!'s perspective, the primary information gap relating to plan management regards options for Participants under the Public Guardian or Public Trustee to access Self-Management or Plan Management options. We believe this gap is leading to a significant under-representation of plan management choices that offer greater levels of choice and control for participants, placing them at a relative disadvantage to other participants and denying their legislated rites under the Scheme.</p> <p>In regional and remote communities there is an information gap concerning how Participants could utilise a combination of supports coordination and plan management to implement their plans utilising non-registered providers.</p> <p>As has been discussed in our submission, participation and utilisation within these communities is significantly lower than the average. While there are a number of factors that contribute, we have learnt from our Walgett experience (where Leap in! is plan manager for 33 of 51 participants in the region) that combining supports coordination with plan management is one way to add additional social scaffolding around individuals, working collaboratively to source non-registered providers who will work within Scheme funding arrangements to assist individuals achieve their plans.</p>
<p>Are there ways in which these barriers could be reduced without affecting the quality of service provision?</p>	<p>We believe that addressing these barriers will increase the quality of service provision and provider choices available to Participants.</p>

Regulation

Question	Answer
Are the registration/unregistered provider requirements effective and efficient? If not, why not?	<p>The registration process and quality and standards framework for plan management is not onerous. This is reflected in the number of registered plan managers in Queensland (421).</p> <p>Leap in! Notes the principle challenge being the NDIA and Quality and Safeguards Commission's ability to make assessments and action registrations and renewals in a timely manner.</p>
What role do NDIS regulations play in your decision to be a registered or unregistered provider?	To offer Plan Management services you must be a registered provider. Given the nature of this role and its critical financial functions Leap in! support this decision.
What resources are required to comply with NDIS price and quality regulations.	<p>An effective quality framework</p> <p>Sufficient finances to fund Quality and Safeguards audits</p> <p>Human capital to release to preparation, review and audit activity.</p>
What impact do differences in the requirements for registered and unregistered providers have on your sector of the NDIS and on the level and quality of supports for participants?	<p>As noted above we support the requirement for Plan Management to remain a required registration group.</p> <p>For participants accessing broader supports via our plan management function Leap in! believes the ecosystem of registered and non-registered providers is an important element of scheme success and aligned with the shift to consumer led purchasing models.</p>

Supply of Services and Supports

Question	Answer
What are the most important factors that affect your decision to supply into the NDIS market?	<p>Clarity and constancy of policy and regulatory intent.</p> <p>We understand that the NDIS is a new and developing scheme with evolving markets. For businesses to make investment decisions in the sector, it is critical for the NDIA to provide as much perspective to the different support categories within the sector with regard to the Agency's intent market evolution and regulatory development.</p>
Is market information sufficient to inform your decision-making about services/supports to offer and your service locations?	<p>No. For 18 months plan managers and intermediaries have been waiting for NDIA to provide guidance on:</p> <ul style="list-style-type: none"> • What role they see these providers playing within the scheme once automation of claims and payments (like HICAPS for the NDIS) enables the majority of claims to be automatically processed. • Regulatory segregation of the system to ensure that providers don't just offer plan management and supports coordination services to promote their own supports delivery arms, and in the process restrict participant choice and control. At present there is not a level playing field that supports a fair and competitive market and which contains significant risks to choice and control principles.
What development in the choices by participants-about when, how and who providers	Leap in! has observed a significant increase in the engagement of sole traders. This has enabled the development of service arrangements which meet gaps (such as short shifts, evening shifts, staff preferences) which participants reported experiencing with larger providers.

<p>supports-have been the most difficult to accommodate or meet? Why?</p>	<p>Providers such as Mable, Hire Up, 5 Good Friends are examples of service innovation which support these models, whilst creating a level of quality and safety assurance.</p> <p>In addition participants (in general) report a desire to purchase a greater therapeutic supports than funded in their plans. This issue is cause is principally linked with plan flexibility.</p> <p>In terms of supply participants report waitlists for Support Coordination and Therapy/Specialist services in some regions.</p>
<p>What differences arise from self-managed plans compared to plan-or agency-managed plans?</p>	<p>The principle difference in self managed plans are:</p> <ul style="list-style-type: none"> a) The removal of price caps b) The lack of oversight/guidance regarding purchasing decisions <p>To date there is little evidence the NDIA has engaged wide scale participant audits and therefore the validity of claiming decisions is yet to be tested.</p>
<p>Does the NDIS market reward efficient/effective providers? Are those operators thriving at the expense of less efficient/effective operators?</p>	<p>No. In plan management there is no question that scale is required to underwrite the investments in technology that are essential to achieving efficiency.</p> <p>Having invested significantly in our technology enablement , for the base NDIA plan management fee Leap in! meets the base NDIS requirement for plan managers of bookkeeping as well as delivering a wide range of system navigation and advisory supports for participants.</p> <p>Unfortunately, a large proportion of participants with a plan manager only receive the most basic bookkeeping support because their provider’s manual and labour intensive processes don’t allow them to do more for the fee.</p> <p>Without NDIA direction for participants on what they should expect from their plan manager above and beyond bookkeeping, there is nothing to rebase consumer expectations and challenge inefficient providers to invest to meet the market or exit.</p>
<p>How does your organisation form (not-for-profit, for-profit, sole trader) influence your delivery strategy (quality, price) and competitiveness in the NDIS market?</p>	<p>Leap in! Is one of the few large plan managers that is NFP. Our mission has always been to see how much value we can deliver to participants and to continually set the benchmark on quality, depth and accessibility of personal and digital services in the category.</p> <p>If we succeed at this, then For Profit providers will be constantly challenged to deliver better value and service for the benefit of participants.</p>