



Early Childhood Intervention Australia Victoria/Tasmania Limited

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ECIA Victoria/Tasmania Limited (ECIA VIC/TAS) is the peak body for early childhood intervention in Victoria and Tasmania. We represent over 600 professionals and organisations providing specialised support and services for infants and young children with disability and/or developmental delay to promote development, well-being and community participation. Our vision is for young children of all abilities to fully participate in family and community life. We provide information and professional development across the sector.

ECIA VIC/TAS members are early childhood intervention (ECI) professionals working in community organisations, disability services, specialist ECI organisations, children's services agencies and government departments reflecting the diverse ways in which these services are provided to young children and their families. Our members implement a best practice approach to early childhood intervention which is outlined in the National Guidelines for Best Practice in Early Childhood Intervention (ECIA 2016). A brief overview of ECI best practice is provided in Appendix 1.

Introduction

ECIA VIC/TAS welcomes the opportunity to provide input to the Inquiry into the Provision of Services under the NDIS Early Childhood Early Intervention Approach. This submission will address key issues from the particular perspective of the Early Childhood Intervention sector which is delivering best practice services to children with disability and/or developmental delay in Victoria and Tasmania.

To achieve the best possible outcomes for children aged 0-6 years in the NDIS, a best practice approach to the delivery of early childhood intervention services is essential. Getting this right for children in their first 3 years will produce better long term results.

ECIA VIC/TAS congratulates the NDIA for their focus on best practice through the NDIS Early Childhood Early Intervention approach and their commitment to achieving the best outcomes for young children and their families. There is genuine good will across the ECI sector and a real desire to collaborate with NDIA to help make this happen. It is in this spirit that ECIA VIC/TAS has identified aspects of the NDIS ECEI approach that require attention to ensure the delivery of best practice for children and their families.

Early Childhood Intervention Australia Victoria/Tasmania: Delivering the best outcomes for young children and families in the NDIS ECEI

The Early Childhood Early Intervention (ECEI) approach has been designed to sit within the NDIS as a specialised, best practice response for children aged 0-6 years with disability and/or developmental delay and their families.

NDIA worked with leading early childhood intervention practitioners and researchers to develop the response. It is to be delivered in collaboration with sector experts, using an evidence based family-centred approach, utilising natural everyday settings to build the personal and community capacity of children and families (NDIS ECEI website).

A key aspect of the ECEI approach is the appointment of Early Childhood Partners as the first point of contact for children and families. They are to be “suitably experienced and qualified organisations with strong local knowledge and understanding of the needs of children and their families to deliver the ECEI Services” (NDIS ECEI website). Their role is to:

- Provide information
- Refer families to mainstream services
- Identify if a child might benefit from some short term intervention and provide these services
- Identify that a child requires long-term specialised early childhood intervention supports then assist the family to request access to the NDIS
- Undertake the planning process with families who receive access to the NDIS
- Coordinate a combination of the options above.

NDIA’s commitment to best practice early childhood intervention through the development of the NDIS ECEI is evident and welcome. Early Childhood Intervention Australia Victoria/Tasmania Limited (ECIA VIC/TAS) has high expectations that this approach can deliver the best outcomes for young children and families in the NDIS. There is also a real desire within the ECI sector to collaborate with NDIA to help make this revolutionary new people-centred approach to care and support work effectively and efficiently.

It is clear that the model is changing and evolving as the roll-out continues and participants, providers and Early Childhood Partners gain a greater understanding of how the Scheme can and should work. At this stage ECIA VIC/TAS believes it is important to address some of the key issues relating to policy, funding and practice that are causing confusion for participants and providers, impacting on access for children and families and hampering the delivery of best practice early childhood intervention.

This paper has been developed as a living document to be updated as the NDIS ECEI approach is fine-tuned and bedded down. The document outlines what an effective and efficient NDIS ECEI model would look like, considers the current situation and suggests some strategies and actions to ensure that children aged 0-6 years and their families are at the centre of the ECEI approach. This work is underpinned by the expectation that children with disability and/or developmental delay will receive best practice Early Childhood Intervention (ECI) based on the ECIA National Guidelines for Best Practice Early Childhood Intervention (ECIA February 2016). The National Guidelines are an evidence-based framework for excellence in service delivery developed by and for the ECI Sector and commissioned by NDIA. A brief overview of ECI best practice is provided in Appendix 1.

An effective and efficient NDIS ECEI approach

1	NDIS ECEI POLICY & PRACTICE		
	The NDIS ECEI approach will deliver:	Current situation:	Suggested strategies:
1.1	A clearly articulated National policy framework and guidelines underpin the NDIS ECEI model.	<p>There is currently no publically available policy document or guidelines detailing the model of early childhood intervention being implemented in the NDIS ECEI. Information is available through a range of documents including:</p> <ul style="list-style-type: none"> • NDIS Act • Annex E to the Statement of Requirements Early Childhood Early Intervention Services • NDIS Price Guide • Operational Guidelines: Access to the NDIS 9. Early Intervention Requirements. <p>However, this information is fragmented and doesn't present an overarching explanation of how the ECEI approach will support children with disability and/or developmental delay and their families in the NDIS.</p>	Develop a clear National publically available policy framework and guidelines for the NDIS ECEI approach underpinned by best practice early childhood intervention based on the <i>ECIA National Guidelines for Best Practice Early Childhood Intervention</i> (ECIA February 2016).
Action 1: NDIA to collaborate with ECIA and coordinate ECI sector expertise (nationally) to inform the development of a policy framework and guidelines for the ECEI approach.			
1.2	Experienced and qualified Early Childhood Partners with strong local knowledge and an understanding of best practice early childhood intervention provide support to children and families.	<p>The slower than expected roll-out of Early Childhood Partners has generated confusion for families and providers and delayed access for young children to the NDIS ECEI. In Victoria six (6) Early Childhood Partners are at various stages of becoming operational. In Tasmania two (2) Early Childhood Partners have been announced.</p> <p>Currently, there is no uniform understanding of what constitutes best practice ECI for Early Childhood Partners.</p> <p>Additionally, a number of Early Childhood Partners have been appointed from out of area and have limited knowledge of local supports and services for children and families.</p>	<p>Improve the ability of Early Childhood Partners to provide appropriate support to children and families by enabling them to draw on the ECI sector's extensive knowledge of:</p> <ol style="list-style-type: none"> 1. best practice ECI and 2. local area supports and services

Action 1: Establish pathways between Early Childhood Partners and the ECI sector to increase knowledge and understanding of best practice ECI and local area supports.

Action 2: Provide mandatory training in best practice ECI (particularly in relation to family-centred practice and the key worker model) for all Early Childhood Partners, NDIA and LAC staff, specifically planners. This training should be based on the ECIA *National Guidelines for Best Practice Early Childhood Intervention*. ECIA VIC/TAS has developed Best Practice in ECI professional development modules and advised NDIA and Early Childhood Partners that this is available and can be tailored for delivery to key staff.

2 ACCESS			
	The NDIS ECEI approach will deliver:	Current situation:	Suggested strategies:
2.1	Timely and straightforward access to the NDIS ECEI for all eligible children aged 0-6 years.	<p>Lower numbers of children and families from some communities are accessing the NDIS including:</p> <ul style="list-style-type: none"> • Aboriginal and Torres Strait Islander children • Children from Culturally and Linguistically Diverse (CALD) backgrounds • Vulnerable children and families with more complex needs, including those in child protection • Rural and regional children and families • Refugee and children and families 	Clarify policy settings and target funding to support children and families with more complex needs to access the NDIS ECEI.

Action 1: Embed culturally safe processes within the NDIS ECEI approach.

Action 2: Provide additional hours of pre-plan support for vulnerable children and families with complex needs to access the NDIS ECEI.

Action 3: Provide an ongoing commitment to fund interpreting services to implement plans when required. While the Victorian Government is funding interpreting services in the North East Melbourne Area as an interim measure, it is unclear what will happen in the longer term and in other roll-out areas including Tasmania.

Action 4: Ensure travel is a “reasonable and necessary” cost in plans to enable the delivery of best practice ECI to children in their natural environments.

Action 5: Ensure cancellation policies are realistic to support work with vulnerable children and families with more complex needs. ECIA VIC/TAS supports the recommendation of the NDIS 2017 Price Controls Review to fund a limited number of cancellations. However, two (2) cancellations per service booking per year is unrealistic in the early childhood space. We recommend examining the number of allowable absences under other Federally funded supports, including Early Childhood Education and Care (ECEC), to determine an appropriate limit.

Action 6: Instigate a system to improve communication and data sharing between relevant government departments and ECI providers, to ensure more appropriate assistance for vulnerable clients with complex needs, including those experiencing family violence and those in Child Protection. This will also enable mechanisms to be put in place to improve workforce safety.

	The NDIS ECEI approach will deliver:	Current situation:	Suggested strategies:
2.2	Children and families not eligible for the NDIS are provided with appropriate initial supports in a timely manner.	With the recent appointment of Early Childhood Partners there is little information yet about what initial supports will be provided and how this will work in practice. It is essential to provide appropriate, adequately resourced supports promptly. Placing a child on yet another waiting list will have negative outcomes for the health and well-being of the child and family.	Provide timely and appropriate information, referral and linkages for families to mainstream services and supports for their child.
<p>Action 1: Ensure that children and families not eligible for the NDIS are assisted as soon they present to the Early Childhood Partner and are not waitlisted.</p> <p>Action 2: Clearly outline the range of initial supports that can be provided to children and families.</p> <p>Action 3: Provide families with a definitive time-frame for the delivery of initial supports.</p> <p>Action 4: Undertake and publish research determining the effectiveness of particular supports, including childcare.</p> <p>Action 5: Ensure mainstream services, including early childhood education and care services and primary health care professionals are aware of the existence of Early Childhood Partners.</p>			
2.3	The wait time for NDIS services is minimal and does not adversely impact on the health, development and well-being of children and families.	<p>The health and development of some children diagnosed with disability and/or developmental delay has been seriously compromised with long wait times for services – providers report delays of several months in some cases. This also generates high levels of stress and anxiety for family members adversely affecting their mental health and well-being. In practice wait times have been compounded by:</p> <ul style="list-style-type: none"> • the early quarantining of the Department of Education ECIS wait list • no clear pathway for eligible new participants to the ECEI • limited numbers of NDIS registered ECI providers available in areas not yet covered by NDIS • concerns with the quality of data 	Eliminate barriers and unnecessary delays to ensure the wait time for NDIS ECEI services is minimal. To be most effective, early intervention needs to be provided for a child as soon as a need is identified. Support families while they wait with a “soft entry” to the NDIS.

Action 1: Ensure Early Childhood Partners are operational six (6) months prior to Scheme roll-out in each area.

Action 2: Provide clarification of the intended pathway to the NDIS ECEI for eligible new participants aged 0-6 years.

Action 3: Support families while they wait by:

- Resourcing ECI services to deliver support, advocacy, information, referral and capacity building to enable families to access universal services
- Providing fact sheets and information about the child's disability and support options including best practice ECI
- Provide information to prepare families for the NDIS ECEI process.

3 SYSTEMS AND PROCESSES

	The NDIS ECEI approach will deliver:	Current situation:	Suggested strategies:
3.1	Portal and systems function effectively to facilitate timely access to the NDIS ECEI for families and providers assisting them.	There have been technical issues for both participants and providers accessing the portal and the NDIS phone and email systems. This has led to delays in registration for providers and delays for families accessing NDIS. While portal functioning has improved, the phone and email systems have not. There are long delays, it can be difficult to get through to the correct section/person and response times are slow.	Work with stakeholders to document system issues and improve design to facilitate access.

Action 1: ECIA VIC/TAS supports the NDS suggestion to "establish an industry advisory group to design and test ICT system changes before they are introduced" (NDS May 2017).

Action 2: Streamline the registration process for approved providers.

Action 3: Provide a separate phone line for NDIS ECEI participants to ensure prompt responses to enquiries from families.

Action 4: Provide a separate "hotline" for ECI providers to ensure children and families are not kept waiting for services unnecessarily (refer to action 2 under 1.3 above.)

4 PLANNING & ASSESSMENT			
	The NDIS ECEI approach will deliver:	Current situation:	Suggested strategies:
4.1	Plans for children aged 0-6 years are developed based on the key worker best practice model of ECI.	Planners are required under contract to develop supports according to best practice guidelines. While this is now more standard practice it is often not explicitly stated in plans. This has led to confusion and uncertainty for providers keen to deliver best practice ECI.	Ensure plans for children aged 0-6 years explicitly state the provision of the key worker model of support and that “reasonable and necessary” costs are included such as travel to provide support in the child’s natural environment and interpreting services where required to implement plans.
4.2	Plans for children aged 0-6 years are appropriately funded to enable the provision of best practice ECI.	<p>ECI service providers are limited in their ability to deliver supports according to best practice guidelines under the “specialised individual therapy for early childhood” support item. This is challenging service viability for providers who are unable to cover the direct and indirect costs involved in best practice ECI including:</p> <ul style="list-style-type: none"> • providing the key worker model • travel costs to support children in their “natural environments” • realistic cancellation policies to support work with vulnerable children and families with more complex needs • interpreters to activate plans <p>In a service environment where viability is challenged, there is a market risk that choice will be limited as organisations merge, fold or are acquired.</p>	<p>ECIA VIC/TAS recommends that further work be undertaken to assess the unit price for best practice ECI supports to ensure that when the market is deregulated:</p> <ul style="list-style-type: none"> • there are enough providers to bring down cost pressures through competition and • the goal of ‘choice and control’ for families is realised.
<p>Action 1: ECIA VIC/TAS has undertaken preliminary work on the costs involved in delivering best practice ECI and can work with NDIA to determine an appropriate unit price for ECI supports.</p>			

	The NDIS ECEI approach will deliver:	Current situation:	Suggested strategies:
4.1	Fair and equitable plans are developed for all eligible young children.	Inequities have been identified by service providers in many plans indicating parents who are better able to advocate for their child's needs or those who are supported through the process are receiving better supports and funding.	Ensure quality, equity and consistency in the planning process in line with best practice.
	Action 1: NDIA to investigate mechanisms to ensure quality, equity and consistency in the planning process. Some possibilities include: <ul style="list-style-type: none"> • advocates for families needing support • clearer guidelines and training for planners (refer to 1.2 Action 2 above) 		
4.4	Diagnostic assessment tools.	NDIS planners are using diagnostic assessment tools such as the PEDI-CAT as planning aids. These tools are not appropriate for use with all children aged 0-6 years. Linking funding to the outcome of these assessments has meant that some children with disability and/or developmental delay who should be eligible for support are being removed from waiting lists with no funding.	Ensure planners use diagnostic assessment tools appropriately.
	Action 1: Provide best practice ECI training for planners that addresses the appropriate use of diagnostic assessment tools (refer to 1.2 Action 2 above).		
4.5	Families have choice and control over the types of supports and services provided to their children.	<p>Families are not receiving adequate independent information and advice to enable them to make the best choice about the range of appropriate supports and service providers for their children. Planners / Early Childhood Partners without an understanding of best practice ECI are unable to assist.</p> <p>Families are not always given a chance to review plans for their children prior to approval. This has led to the development of inappropriate plans and contributed to the high incidence of plan reviews.</p>	<p>Ensure families:</p> <ul style="list-style-type: none"> • are informed about the full range of supports and services available to them • can review the plan developed for their child prior to approval.

Action 1: Provide “consumer awareness” forums for families in the NDIS ECEI including information on the benefits of best practice ECI to enable more informed choices to be made for children. ECIA VIC/TAS can adapt and deliver best practice training modules for this purpose.

Action 2: Develop pathways and connections between the ECI sector and Early Childhood Partners to facilitate knowledge sharing and an understanding about the range of supports and services available to families (refer to 1.2 Action 1 above). ECIA VIC/TAS has begun the process of connecting with Early Childhood Partners and is willing to investigate mechanisms to achieve this.

Action 3: Provide an opportunity for the child’s family to review the plan prior to approval as per Annex E 7.4.7 (d).

	The NDIS ECEI approach will deliver:	Current situation:	Suggested strategies:
4.6	Holistic plans are developed for all young children in partnership with families based on best practice early childhood intervention.	<p>There have been inconsistencies in plans developed for young children. Some plans have excluded support items required by families, others have included supports not requested or inappropriate. Issues have included:</p> <ul style="list-style-type: none"> • inadequate communication between planners and families • lack of knowledge about appropriate support options (amongst both planners and families) • no process in place for a family to review the plan developed for their child • lack of clarity and guidance around the function, allocation and use of support coordination. Under the ECEI approach there has been some confusion that support coordination and the key worker model fulfil the same role though this is not the case. 	Initiate measures to ensure holistic plans can be developed for all young children.

Action 1: Develop plans in collaboration with the child and family.

Action 2: Develop plans during face-to-face meeting/s at a time and location to suit the family.

Action 3: Develop planning partnerships with ECI providers (refer to 4.5 Action 2 above).

Action 4: Clarify the function and use of support coordination.

Action 5: Use a key worker to provide therapeutic support and link the team around the child.

Action 6: Include “reasonable and necessary” costs such as travel to deliver ECI supports in a child’s natural environment and interpreting services where required to implement plans.

Action 7: Ensure that the child’s family can review the plan prior to approval as per Annex E 7.4.7 (d).

5	WORKFORCE		
	The NDIS ECEI approach will deliver:	Current situation:	Suggested strategies:
5.1	A qualified and experienced workforce committed to the delivery of best practice early childhood intervention supports.	<p>ECEI professionals committed to the delivery of best practice for children and families are anxious about working in a diminished model under the ECEI approach. ECEI services are worried about an exodus of qualified and experience staff.</p> <p>In rural and regional areas of Victoria and Tasmania there is already a shortage of qualified and experienced staff and ECEI providers often rely on new graduates.</p> <p>There is also concern that funding constraints will lead to the employment of graduates with lower level qualifications and/or less experience. Early childhood teachers in particular may miss out as their qualifications require higher level remuneration.</p>	<p>Address the issues of policy, funding and practice identified within this paper that are impacting the delivery of best practice ECEI in the ECEI approach.</p> <p>Ensure funding and strategies combine to attract and retain a qualified and experienced ECEI workforce, including in rural and regional areas.</p>
<p>Action 1: Work with universities to progress teaching at the undergraduate level to enable graduates to deliver best practice.</p> <p>Action 2: Provide placements for students when many small services are unable to do.</p> <p>Action 3: Undertake and fund Professional Development Training.</p> <p>Action 4: Investigate options to attract qualified and experienced ECEI professionals to rural and regional areas.</p>			

6 MARKETS			
	The NDIS ECEI approach will deliver:	Current situation:	Suggested strategies:
6.1	A robust and viable ECI sector provides choice for children and families	It is difficult for services to plan for the longer term and commit to investment in an uncertain and changing environment. This is currently exacerbated by poor communication and an inadequate flow of information and data. At this stage there are no mechanisms in place for all parties delivering the ECEI approach to engage, share information, resources and expertise.	Provide adequate data and information to facilitate service planning and investment for the future.
	<p>Action 1: ECIA VIC/TAS supports the publication of additional data and information to assist providers to better plan and invest for the future and the recommendation of the Productivity Commission (July 2017) to publish more detailed market position statements.</p> <p>Action 2: Improve collaboration and communication between those working to deliver the NDIS ECEI approach by putting in place a working group with members from organisations involved in the ECEI approach (refer to 1.2 Action 1 above).</p>		
6.2	Rural, regional and high growth metropolitan areas can provide children and families with access to best practice ECI services.	There are a limited number of ECI service providers in rural and regional areas of Victoria and Tasmania and in high growth metropolitan corridors, particularly in outer Melbourne. This limits choice for families.	Review and revise the costs of service provision in rural, regional and high growth areas to ensure ECI delivery.
	<p>Action 1: Engage ECIA VIC/TAS to undertake a needs assessment to identify areas in Victoria and Tasmania with no or limited ECI service provision.</p> <p>Action 2: Engage ECIA VIC/TAS to provide an outreach support program connecting areas of need with best practice ECI service providers.</p>		

Appendix 1: Early Childhood Intervention best practice (overview)

Early childhood intervention (ECI) is the process of providing specialized support and services for infants and young children with disability and/or developmental delay and their families, in order to promote development, well-being and community participation. (ECIA 2016)

The primary focus of high quality early childhood intervention is to optimise a child's learning and development and their capacity to participate meaningfully in family and community life. To achieve the best possible outcomes for children aged 0-6 years in the NDIS, a best practice approach to the delivery of early childhood intervention services is essential. It is critical that this best practice approach is clearly articulated, universally understood and fully funded.

Many children and families using early childhood intervention services have multiple needs, requiring the expertise of professionals from multiple disciplines. For such families, best practice in ECI involves the delivery of services through a single professional or key worker, with the collaborative support of an appropriately knowledgeable and professional team. The key worker provides therapeutic support and links the team around the child.

Services are provided in the child's natural environment – at home, in daily routines, in the community, in early childhood education and care settings. Using best practice principles, ECI professionals build the capacity of the child, their family, professionals, including early childhood educators and others in the community to facilitate inclusion in daily life and maximise the child's learning and development. ECI professionals work respectfully with families from diverse backgrounds to achieve the outcomes they want for their child and family.

This approach to best practice ECI is based on extensive consultation within the ECI sector and on Australian and International research literature and is detailed in the ECIA National Guidelines for Best Practice in Early Childhood Intervention (ECIA 2016). In Victoria, these principles have been well understood and supported by the State Government through the Department of Education and Training. It is essential that this important work in best practice ECI is maintained and funded into the future.

References

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www.ecia.org.au/resources/best-practice-guidelines/national-guidelines-for-best-practice

NDIS (February 2016). NDIS Early Childhood Early Intervention (ECEI) Approach. Available at:

www.ndis.gov.au/html/sites/default/files/documents/Research/NDIA-ECEI-Approach-1.pdf

National Disability Insurance Scheme Act 2013 (Cth) Available at: www.legislation.gov.au

NDIS Annex E to the Statement of Requirements Early Childhood Early Intervention Services.

www.dss.gov.au/sites/default/files/ndia_-_sor_annex_e_-_early_childhood_and_early_intervention_services.pdf

NDIS ECEI website: www.ndis.gov.au/ecei

NDIS Operational Guidelines: Access to the NDIS 9. Early Intervention Requirements:

www.ndis.gov.au/operational-guideline/access/early-intervention-requirements.html

NDIS 2017 Price Guide: <https://www.ndis.gov.au/providers/pricing-and-payment>

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