

Submission to the Inquiry into the NDIS ICT Systems

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1. Introduction

The Benevolent Society welcomes the opportunity to contribute to *the Inquiry into the National Disability Insurance Scheme (NDIS) Information and Communication Technology (ICT) Systems*.

The Benevolent Society strongly supports the NDIS and views it as a vital reform to help people with disability live their best lives. However, in our experience problems arising from the NDIS ICT systems have created significant barriers for both participants and providers which undermine the objectives of the scheme and ultimately endanger its success.

In adjusting to the NDIS market system, The Benevolent Society has found the ongoing administrative and technical difficulties arising from the NDIS ICT systems have created significant additional costs and barriers to providing services to our clients.

Key issues that have arisen for our staff include slow or poorly designed functionality within the MyPlace portal and difficulties in liaising with the NDIA to resolve technical issues. This has created an excessive administrative burden with significant flow-on costs for The Benevolent Society in the form of unbillable staff hours, costs from rejected bills due to system errors, and the cost of hiring additional staff required to resolve administrative issues.

We recognise that we are not alone in facing challenges with the NDIS ICT systems and note that the range of issues identified in this submission will have affected smaller and larger organisations differently. Overall, The Benevolent Society believes that the high level of administration and unbillable work resulting from the deficiencies of the NDIS ICT systems threatens the financial viability of service providers and the NDIS market system. The Benevolent Society wishes to engage in discussions and work constructively with federal and state governments and other stakeholders to resolve these issues.

2. About The Benevolent Society

The Benevolent Society is Australia's first charity. We're a not-for-profit and non-religious organisation and we've helped individuals, families and communities achieve positive change for over 200 years.

Since our earliest days, we've been driven by a vision of a just society where all Australians live their best lives. We support people across the lifespan, delivering services for children and families, older people, women, people with mental illness, people with disability and through community development programs.

Following the acquisition of disability support services from the NSW Government in 2017, we now are now one of the largest providers of specialist clinical disability services in Australia.

Snapshot

- The Benevolent Society is a secular non-profit organisation with 1,615 staff and 658 volunteers who, in 2016/17 worked with 54,038 clients.
- We deliver services from over 60 locations with support from local, state and federal governments, businesses, community partners, trusts and foundations.
- Our revenue in 2016/17 was \$108.5 million.
- In 2016/17, 89% of our income came from government sources.
- The Benevolent Society is a company limited by guarantee with an independent board.

3. Participant and provider experience of the MyPlace portal

The NDIS ICT system is difficult to use and causes ongoing issues for clients and service providers. The NDIS, as a consumer-directed system, is based on the premise that exercising greater choice and control will deliver the best outcome for people with disability. The difficulties that participants face navigating the complex NDIS ICT systems is hampering their ability to meaningfully exercise this choice and control.

From our experience, the NDIS ICT systems seem to be predicated on the assumption that participants can readily navigate online digital systems with a high degree of digital literacy, which in many instances is not the case. The Benevolent Society's staff have witnessed the frustration felt by our clients who are struggling to navigate a system with limited information and assistance from the NDIA. Staff report that many clients have chosen not to interact with the My Place portal at all, instead relying on our staff to assist them with this and act as an intermediary with the NDIA to resolve issues. We have also heard that the requirement to access the MyPlace portal via myGov is a barrier for some NDIA participants, because they are reluctant to create a MyGov account or find it too complicated to do so. Based on these issues, we can only imagine how difficult it is for some hard-to-reach participants, and for participants with complex support needs with limited assistance, to fully participate in the scheme.

The Benevolent Society believes that an ICT system that requires advanced digital literacy is counterproductive to the aim of creating a system that allows people with disability greater choice and control.

Recommendation

1. The Benevolent Society recommends that the NDIA works closely with NDIS participants to ensure the ICT system is designed to better meet the requirements of people with disability and is therefore more 'user-friendly'.

Tools and functionality within the MyPlace Portal

The Benevolent Society has experienced considerable ongoing issues with the MyPlace Portal, which have compounded the overall difficulties of transferring to the NDIS. While we acknowledge there have been recent efforts by the NDIA to resolve some of the challenges faced by service providers, the lack of certain functions and the limitations of others within the MyPlace Portal continue to have a detrimental impact on our business and our ability to provide the best possible service to our clients.

A key issue is that the portal isn't always available. Our staff have reported instances where the portal is offline at critical moments. When working with clients who may be in crisis, having an ICT system that is unreliable or unavailable is extremely problematic for the provision of urgently needed services. We have anecdotal reports of staff setting alarms to wake up in the early hours of the morning to access the portal, because there are likely to be fewer users on the system at this time and it is more likely to be functioning.

Another overarching concern reported by our staff is that using the portal is extremely time consuming. Staff note that processes within the portal are often inefficient, with limited ways to access and view information requiring staff to unnecessarily repeat steps. For example, to move from viewing one client's information to another meant returning to the beginning of the search process, rather than being able to view separate clients in separate tabs. Staff report that a single page can take a long time to load, compounding users' frustration. The accumulated time lost in dealing with these administrative issues is unbillable and has significant cost implications for service providers.

Further, the portal does not seem to have been designed with the longevity of the system in mind. For example, currently all service bookings remain visible within the system. This means that over time it will become increasingly difficult to find bookings as the overall number of service bookings in the system continues to grow.

Elsewhere, insufficient training resources and support have been afforded to service providers and their staff to equip them in using the MyPlace portal. The MyPlace Portal was launched without the provision of a 'sand pit' training and testing site. This meant there was no way of training and familiarising staff with the portal's functionality without putting in real service bookings. Additionally, staff reported that the training manual provided for navigating the portal was basic and unhelpful for resolving the more complex issues they encountered. A consequence of this for our organisation was a higher number of initial errors in service bookings and billing rejections as a result of these errors. The process for contacting the NDIA to amend booking errors was time-consuming and inefficient. To deal with these issues, The Benevolent Society made a significant investment in compiling more comprehensive training packages and resources for our staff. However, we note that smaller service providers are much less likely to be able to absorb the costs resulting from these additional training requirements.

The Benevolent Society acknowledges that the NDIA has made ongoing efforts resolve technical issues arising in the portal. We are pleased that one of our staff was recently given the opportunity to help the NDIA to test and provide feedback on system solutions. We believe that service providers are best placed to give insight as to whether ICT system changes will have an impact on their provision of services and that improvements to the MyPlace Portal must be made through a collaborative and consultative process with service providers. However, we note that the assistance that our staff have provided is often on weekends or outside of standard operating hours and is another example of the additional administrative work that accompanies the NDIS which is not covered under the scheme.

Recommendation

2. The Benevolent Society recommends that the NDIA allocates greater resourcing to a process for actively involving service providers in planning and testing ICT system changes.

Issues arising from plan reviews

A large proportion of the ICT issues that The Benevolent Society has faced stem from the fact that when NDIS participant plans are reviewed, active plans are suspended until the review is finalised. A review can be instigated by the client, the NDIA or by another service provider without our organisation, or sometimes the client, being alerted.

During a review, all service bookings connected to a client's plan are made inactive within the portal system, so any outstanding payments entered into the system for services provided under the plan before it was suspended for review are rejected without explanation. It takes a lot of time to then work back through the system to find out why bills were rejected. At this point, we often discover that we have delivered services which are no longer covered by a plan and therefore can't be charged against the scheme. The amount of time it takes to bill clients and resolve issues with invoices which have been rejected by the NDIS portal without explanation has required The Benevolent Society to hire additional staff to handle this administrative burden.

Anecdotally, The Benevolent Society has found that about 10-12 per cent of invoices in each billing cycle are rejected, due to both human error and cancelled service bookings due to plan reviews. After

detailed follow up to find the source of the error which takes several days some of this revenue can be recovered, but some is not recoverable and is lost to our organisation.

In addition to the loss of revenue for service providers, this process can also be extremely confusing and disruptive for our clients, especially those who were not notified of a plan review. We have found the need to suddenly suspend services such as psychological or specialist behaviour support, because a plan is under review and bookings have been cancelled, can have severe repercussions for clients in crisis or with complex support needs.

Recommendation

3. The Benevolent Society recommends that the NDIA examines the issue of service providers' inability to bill for services delivered to a client prior to and during a plan review. This should include the development of a notification system for clients and service providers alerting them when a plan review process is underway.

Liaising with the NDIA

The Benevolent Society staff regularly find it difficult to communicate with the NDIA to get an informed and consistent response to technology issues. In contrast to clients and the NDIA who are able to directly make changes and variations in the portal, until recently service providers needed to contact the NDIA to make simple updates or amendments to a booking. It can often be hard to get through to the NDIA by phone, with typical wait times of half an hour or more. Our staff also report receiving conflicting advice depending on which NDIA staff member they have spoken to. NDIA staff do not usually provide names or direct contact details so staff and clients can't confirm advice or request further information if they need to follow up. Due to these communication difficulties and the length of time it takes to resolve issues, our staff have reported instances where clients have chosen to move to other service providers.

A particular problem has emerged for organisations with large NDIS workforces trying to communicate with the NDIA, as outlined in the case study below.

Case study

A Benevolent Society staff member called the NDIA and after waiting for over 45 minutes was told that the NDIA couldn't discuss the staff member's client because the staff member was not listed as an employee of The Benevolent Society on the NDIS portal.

This happens regularly and appears to be an issue for large service providers as the portal can only show a limited number of names for each organisation. Whilst all of our relevant staff are registered with the NDIA, their names do not show up on the portal, meaning they are not recognised as authorised to discuss NDIS clients with the NDIA when they make inquiries.

The NDIA has investigated this issue and reported that the problem has been resolved because they are now providing training to staff on how to more effectively search for service provider staff names in the system.

While the occurrence of this problem has decreased, we are still experiencing situations where NDIA staff decline to provide client information to our staff. Each instance creates a significant amount of administrative work for our staff to then recontact the NDIA to prove that the staff member is registered and has the relevant permissions. As a result, The Benevolent Society has had to provide our own staff members with training on how to explain to NDIA staff the process for looking up their names in the system.

In addition to difficulties with the helpline, there is a general lack of clear and early communication from the NDIA about planned changes within the NDIS ICT systems. Our staff report that often they will only be alerted to changes within the portal when they begin to experience problems. While some information is available through the NDIS website, it is difficult to navigate the large amount of content on the website to find relevant and up to date information.

Notifications sent out about major changes within the system sometimes don't cover all the necessary information, or only provide a very high level overview. For example, information provided about the most recent pricing changes did not make clear that in addition to indexing participant plans, the NDIA would be creating new service bookings in the system realigned to the new prices. As a result of this, The Benevolent Society experienced a substantial jump in the amount of billing errors, from a 10-12 per cent error rate to a 20 per cent error rate.

The lack of advance warning and adequate information about major changes within the system makes it hard for service providers to gauge what impact these changes will have on their business and prepare accordingly so as not to disrupt services to clients.

Recommendation

The Benevolent Society recommends that:

4. the NDIA resolves the issue of the portal's inability to display or include the names of all staff from large service providers;
5. the NDIA provides clear and comprehensive alerts regarding changes to the ICT system in advance of the changes being made

4. The impact of ICT infrastructure on the implementation of the NDIS

A vibrant market is essential to achieve the overall objectives of the NDIS, however significant ICT challenges are creating a deterrent to organisations entering the market. Many service providers are already struggling with financial viability under the NDIS. The additional strain created by inefficient ICT systems and the flow on administrative and financial implications is taking a toll on many organisations who are either limiting their NDIS exposure or withdrawing from scheme. The NDIA must urgently resolve the issues within the NDIS ICT system to ensure they do not continue to undermine the success of the scheme.