

The Secretary, Social Development Committee
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5 August 2022

Re: Parliament of South Australia, Social Development Committee Inquiry: National Disability Insurance Scheme impacts on South Australian participants with complex needs who are at risk or, living in inappropriate accommodation for long periods.

Dear Secretary,

Occupational Therapy Australia (OTA) welcomes the opportunity to provide feedback to the South Australian Social Development Committee inquiry into, and report on, the impact of the National Disability Insurance Scheme (NDIS) on South Australians living with disability who have complex needs and are, or are at risk of, residing for long periods in inappropriate accommodation (such as hospital or residential aged care).

OTA is the professional association and peak body representing occupational therapists in Australia. As of March 2022, there were more than 26,500 registered occupational therapists working across the government, non-government, private and community sectors in Australia, with over 2,100 working in South Australia. Occupational therapists are allied health professionals whose role is to enable individuals to engage in meaningful and productive activities. A significant proportion of the individuals occupational therapists work with are people with disability, including those who receive funding through the NDIS.

Occupational therapists have a pivotal role in the assessment for and maintenance of accommodation for NDIS participants with complex needs. This includes:

- identifying the need for specific housing relating to a person's disability in relation to the physical environment and ensuring it meets their physical, social, sensory and support needs to foster engagement in valued roles, community participation and social connection.
- Communicating needs effectively through a housing needs report with recommendations relating to SDA, SIL and ILO funding, home modifications and assistive technology required in that accommodation, core supports, and capacity building funding required to make it sustainable.
- Providing advice on accommodation sourced to ensure it is suitable and making recommendations about the person's needs within the recommended accommodation; and
- Identifying any restrictive practices in place or considered necessary following required protocols including collaboration with Behaviour Support Practitioners to ensure any restrictive practices are regulated.

The following provides OTA's response to the specific reference items identified by the Social Development Committee.

- (a) Ability to access and navigate the requirements of the NDIS
 - Occupational therapists continue to experience ongoing challenges with navigating the NDIA reporting expectations. Therapists often experience inconsistencies from case to case regarding

what information and level of detail is required. These inconsistencies contribute to delays in the approval of plans and often cause delays in transitions or discharges to either appropriate housing or accommodation.

- Additionally, many participants, especially those with complex needs, require some level of support to understand the NDIS and identify what they require in terms of their funding. NDIS participants are often contacted by the NDIA (via phone) to assist with forming a decision regarding their own plan. This often occurs at a time when a support person is not present, resulting in a new plan roll over or a reduction in funding. This is particularly an issue for mental health participants where an individual can present well via the telephone despite needing much greater daily support. For example, living conditions as well as levels of social and community participation cannot accurately be assessed over the phone.
- (b) The timeliness of approval for appropriate specialist disability supports, including home and living decisions through the NDIS, and processes that may lead to delays;
- Occupational therapists report significant delays (often months) in the approval process for clients in acute and/or rehab hospital beds. With participants remaining in hospital while waiting for their funding packages to be approved, despite no longer requiring hospital care. These delays can have a significant impact on the health and wellbeing outcomes of individuals as well as having a significant economic and operational impact on the hospital and healthcare system. These delays create a block in the hospital system, slowing patient flow and the availability of new beds for patients who require an acute or rehab bed. This impact flows onto the ambulance services transporting patients to hospital, contributing the ‘ramping’ across SA hospitals.
 - Occupational therapists experience inconsistencies with the detail of information required by the NDIA to make a final decision on an individual’s plan despite OTs using the standardised tools requested by the NDIA. Occupational therapists report receiving ambiguous feedback about what is required, with limited or no justification as to how or why a decision was reached. These challenges and the frustrations of navigating the NDIA reporting expectations contribute to ongoing delays and poor retention of occupational therapists working in the disability sector.
- (c) The adequacy of funding in NDIS plans to fund the supports required;
- The needs of individual participants are different, and as such, occupational therapists must apply unique clinical reasoning to each participant’s ability and situation. Occupational therapists experience difficulties with completing the required assessments within the funding allocated, often with no capacity to review or follow up post assessment. Ensuring that participant plans are appropriately funded to allow occupational therapists to provide this clinical reasoning at the point of initial assessment will enable a more accurate determination to be made on the appropriate level of assessments, trials and prescriptions required.
 - Additionally, as participants’ functional abilities change over time, without opportunities for review and the continued clinical oversight of occupational therapists and without proper maintenance and adjustments, there is an increased risk to participants using equipment or receiving supports that may no longer be appropriate.

- (d) The ability of the NDIS workforce and market (including the specialist disability accommodation policy settings and market) in South Australia to deliver necessary accommodation and funded supports;
- Due to hospital discharge pressures, participants are often encouraged to agree to inappropriate or inadequate accommodation to progress a discharge from hospital. This practice is extremely inappropriate and places individuals at potential risk due to a lack of necessary supports in their accommodation. Occupational therapists then report considerable challenges with the pathways of subsequently transitioning participants to more appropriate accommodation. These challenges are often due to the individual's disability, especially with regards to mental health, brain injury, autism spectrum disorder and the assistance they often require navigating the system and processes required.
 - Occupational therapists are often confronted with supported independent living (SIL) providers seeking participants with a high number of hours to make the SIL arrangement more financially sustainable. Therefore, it can be hard to locate SIL vacancies for a participant who is on the lower end of care hours required for SIL.
 - Sourcing and advocating for suitable housing is a specialist skill, that support coordinators are sometimes not well-versed in. There is a need and an opportunity for specialist services dedicated to this area.
- (e) The impact on the wellbeing of participants of these inappropriate accommodation arrangements;
- There are significant impacts on the overall health and wellbeing of individuals who are either placed or stranded in accommodation that does not meet their needs. As identified, individuals can spend lengthy periods of time in acute or rehabilitation hospitals waiting for appropriate accommodation. At the same time, some individuals are simply placed into inappropriate accommodation to alleviate the pressures on hospitals. Occupational therapists are particularly concerned with the impact of these sub-optimal environments on an individual's ability to function and engage in activities that are important and meaningful to them. This occupational deprivation and occupational alienation has long term impacts on physical and mental health, and for those with complex needs and disabilities this impact can be extremely harmful.

Other relevant matters to note.

- Occupational therapists report a lack of culturally appropriate accommodation, often finding it very difficult to seek accommodation that is culturally appropriate for the person, especially for people who are Aboriginal or Torres Strait Islander. This problem is compounded for people with complex needs as accommodation to meet their complex needs is hard to source resulting in their cultural needs being compromised.
- Occupational therapists report ongoing challenges and a conflict of interest with many accommodation providers and support coordinators being organisationally aligned or operating within the same company. This presents significant concerns and questions regarding appropriateness of accommodation allocated when support coordinators and accommodation providers are aligned. Questions must be asked if this meets the needs of the participant or the service provider.

Should you wish to discuss any of the matters raised in this letter, please contact Michelle Oliver, South Australian Divisional Manager on 0466 159 636 or michelle.oliver@otaus.com.au.

Yours sincerely,



Michelle Oliver
Divisional Manager, South Australia