



Submission from the National Mental Health Consumer and Carer Forum on the Exposure Draft of the New Disability Employment Services and Employer Incentive Scheme 2010-2012 Purchasing Arrangements

July 2009

Thank you for the opportunity to comment on the Exposure Draft of the New Disability Employment Services and Employer Incentive Scheme 2010-2012 Purchasing Arrangements, which impacts directly on many people with mental illness.

The National Mental Health Consumer and Carer Forum (NMHCCF) is the combined national voice for consumers and carers participating in the development of policy affecting mental health consumers and carers. The NMHCCF is funded by states and territories and the Australian Government through the Australian Health Ministers Advisory Council.

The NMHCCF is pleased that the consultations on the Disability Employment Services Review and the Job Capacity Assessment Review have resulted in changes that address many of the concerns around the old Welfare to Work policies raised mental health consumers and carers. These changes include the uncapping of disability employment services to respond to demand; fairer breach conditions; enhanced flexibility of services to cater to the needs of people with mental illness; and improved Job Capacity Assessment (JCA) processes.

The NMHCCF does however, have a number of concerns raised by the Exposure Draft and these are outlined below:

Job Capacity Assessment and Ongoing Support Assessments

The NMHCCF is very pleased to note that the new Disability Employment Services (DES) model outlined in the Exposure Draft:

- details provision of funding for more and more appropriately qualified JCA Assessors; and
- that JCAs will take into account appropriate medical and other sources when making an assessment.

These provisions should go some way to making the JCA a fairer process for mental health consumers. However it will also be important that the new JCA processes are monitored closely to evaluate how well they are working. Disability Employment Services and their clients need to be able to participate in providing feedback on how well the new JCA arrangements are working. It is not clear from the Exposure Draft how this will be undertaken.

Monitoring of the new Ongoing Support Assessment arrangements will also need to be in place to ensure that these do not disadvantage mental health consumers in the same way that the old JCA process did.

New Disability Employment Services Model

Due to the limited nature of the Exposure Draft and the lack of detail about many aspects of DES implementation it is difficult to identify the impact of the new service model on service clients until implementation.

Because the Exposure Draft does not describe in detail how services will be implemented, detailed guidelines on implementation are likely to be developed. It will be important that these guidelines include rigorous monitoring and continuous quality improvement arrangements and utilise the experience of service users to inform service improvement.

Under the Key Performance Indicators the Exposure Draft include does include broad provision for DES to identify the experience of service users, however there is no detail on defining the scope of this experience or how this will be used to inform service delivery at a local level. Involving service clients in the development and implementation of these guidelines will be critical to how well services work on the ground.

It will also be important to see how well any sector-wide collaboration – including the participation of DEEWR agencies – is monitored. While this may be outside the scope of the Exposure Draft, the participation of DES and service user input will be an important element of continuous quality improvement in the sector.

Flexible ongoing support arrangements

The Exposure Draft advises:

“Flexible Ongoing Support will provide a safety net for participants who have been placed into work, but whose support needs are likely to be irregular or less predictable. This support option enables Providers to offer flexible assistance, including short bursts of intensive support in the workplace, and better supports participants with mental health and other episodic conditions.”

While this option will go some way to meeting the needs of people experiencing episodic conditions it is not clear how it would be activated and whether it will be efficient enough to provide a real safety net for people whose original JCA does not adequately identify their support needs in the first place. Again this will need to be monitored on the ground and again this monitoring would again need to include the feedback of all parties to the process.

Key Performance indicators

The KPIs identified in the Exposure Draft are extremely general and need to be more detailed to adequately measure appropriate service outcomes.

For example, to ensure quality services, an important first step will be to develop a range of specific and meaningful measures for effectively measuring stakeholder satisfaction. A process then needs to be identified to ensure that this data is in turn used to inform service improvements. This then needs to form an integral part of the Request for Tender and subsequent DES contract.

Linking the KPIs with the National Disability Standards is a good way of ensuring the quality of services, but it is likely that services will again need more guidance that this on how to implement these standards. This needs to be done in consultation with service users for the most effective result.

It is essential that mental health consumers and carers are provided with an opportunity to be a part of the process for developing the proposed KPIs and the NMHCCF would be happy to participate in any process to develop these further.

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