

ATTACHMENT 4: GAP ANALYSIS (OPA/ Disability Advocate recommendations, NDIS Act 2013 Review Report and The Hon Stuart Robert MP - NDIS Plan Press Club speech)

OPA/ DISABILITY ADVOCATE FINDINGS	PROPOSED SOLUTION	REPORT - REVIEW OF THE NATIONAL DISABILITY INSURANCE SCHEME ACT 2013- REMOVING RED TAPE AND IMPLEMENTING THE NDIS PARTICIPANT SERVICE GUARANTEE – DAVID TUNE DECEMBER 2019	THE HON STUART ROBERT MP NATIONAL PRESS CLUB SPEECH	GAP
<p>1. The planning questionnaire does not capture the extent of the participant needs or subtlety due to yes/no answers required.</p>	<p>Centrelink have a questionnaire using a scaling system. Which could be used by the NDIA.</p>	<p>Recommendation 2 The NDIA trials an arrangement where all planning related functions are undertaken with a person who has delegation to approve the plan, and compares the benefits of that approach with the roll out of Joint Planning Meetings.</p>	<p>Lane 1 Joint planning meetings which will allow a participant, LAC and NDIA Planner to collectively discuss a working version of the plan and included support funding before it is approved.</p>	<p>The recommendation does not directly address concerns about the questionnaire but may ensure that the plan approver has a better understanding of the participant needs by being present at the planning meeting.</p>
<p>2. Access Request Issues -Rigid assessment requirements that are unclear to the participants.</p>	<p>More flexibility in the assessment process and more guidance for participants, families and health professions so that assessment reports to better reflect the functional capacity impact.</p>	<p>Appendix D8 The NDIA has released three new participant booklets to support people with disability and participants throughout their journey. The booklets are intended to be a practical tool to help people learn more about the NDIS, prepare for a planning meeting and to implement their plan.</p> <p>Recommendation 3 The Commonwealth provides additional funding for people with disability to navigate the NDIS, with a review of demand to occur as part of the next review of NDIS costs, currently scheduled for 2023.</p> <p>Recommendation 7a and 7b. The NDIA Act is amended to: Allow evidence provided to the NDIA about a prospective participant or participant to be used for multiple purposes under the NDIA Act, including access planning and plan review processes b) provide discretionary powers for the NDIA to require a prospective participant or participant to undergo an assessment for the purposes of decision making under the NDIA Act, using NDIA approved providers and in a form set by the NDIA.</p> <p>Key Findings (Ch 4):</p> <ul style="list-style-type: none"> ✓ Standardised functional capacity assessments would improve the quality and consistency of NDIA decisions. If undertaken at the point of access it would also improve the participant experience by mitigating the need for the participant to provide further information about their functional capacity later in their NDIS journey. ✓ The administrative and financial burden felt by both prospective participants and participants to provide evidence to the NDIA should be minimised. ✓ Greater clarity should be provided surrounding the requirement for, use and form of information required to support decision-making. <p>4.27 onwards: A program with a national panel of independent and appropriately skilled and qualified assessors to undertake free functional assessments will roll out across Australia from July 2020.</p> <p>Key Findings (Ch 5) Key findings</p> <ul style="list-style-type: none"> ✓ Additional clarity should be provided on when a person meets the access requirements to enhance the responsiveness of the NDIS to people with disability. 	<p>Lane 2 Expanding Community Connectors Program to help those requiring a more tailored support to access and engage with the NDIS.</p>	

		<ul style="list-style-type: none"> ✓ The NDIA has an important role to play in supporting prospective participants through the access process. It cannot be assumed people with disability have the capacity to navigate the access process without help. 		
3. The price guide is complex and not well understood by participants	Price guide needs to be simplified to allow participants to understand pricing – this would help them to understand and build their capacity.	<p>D9 The NDIA has undertaken extensive stakeholder engagement to resolve inconsistencies in terminology and phrases used to describe supports in the NDIS price guide, MyPlace portal and participant plans.</p> <p>6.41 The NDIA has advised further changes will occur in 2020 to update the catalogue of NDIS supports and NDIS price guide to have an explicit reference to respite, so all participants and providers are clear on the scope and intent of services that can be delivered with NDIS funding.</p>	No comment on this recommendation in the speech.	
4. Mismatch between what the participant says at the planning meeting and what they get in the plan.	<p>Needs to be a check undertaken before plan is finalised to ensure it is correct. Participant should be able to review the plan prior to it being approved.</p> <p>If there is a change to a plan from the planning meeting to when it is approved, there needs to be an explanation to the participant as to why the plan is different.</p>	<p>Recommendation 25 That the NDIS Act is amended to legislate a Participant Service Guarantee as a Category C rule, to be updated from time to time, with:</p> <p>c) prospective participants and participants being empowered to request an explanation of an access, planning or plan review decision made by the NDIA.</p> <p>d) participants being empowered to receive a full draft plan before it is approved.</p> <p>Key findings (Ch 3):</p> <ul style="list-style-type: none"> ✓ Improvements to the participant experience could occur by ensuring all planning processes are done with a person who has delegation to make the decision. ✓ People with disability have the right to understand the reasons behind decisions the NDIA makes regarding their eligibility for the NDIS and the supports provided in their plans. ✓ Participants should be provided with a whole draft plan before it is approved to keep them at the centre of the planning process. 	<p>Lane 1 Provision of draft summaries of plans from April 2018 which will enable participants to review and amend their personal details, goals, living arrangements, informal community supports and other community supports, and social and economic participation prior to a plan being developed.</p> <p>Lane 1 Joint planning meetings which will allow a participant, LAC and NDIA Planner to collectively discuss a working version of the plan and included support funding before it is approved.</p>	
5. Large number of plan reviews	Light touch reviews have helped this issue, although further resources required to address the back-log. Clear communication on evidence needed for a review.	<p>Recommendation 21 The NDIS Act is amended to introduce a new Category D rule-making power giving the NDIA the ability to amend a plan in appropriate circumstances.</p> <p>8.33 Access to supports already determined as reasonable and necessary should not be delayed unnecessarily. On this basis, a plan should be able to be amended, without requiring a plan review or automatically creating a new plan, in certain limited circumstances. A plan amendment would be suitable in cases where the NDIA is satisfied that the change to be made, or the new support to be added, could be considered in isolation from the other supports in the plan.</p> <p>D12 In November 2019, the NDIA updated their ICT, planner guidance and public communications to provide the opportunity for participants in a stable situation to have longer plans of up to three years. A longer plan review duration means participants can carry on with their lives without needing to go through an annual plan review process.</p>	Lane 1 Participants who only require a small adjustment to their plan due to a change in circumstances, is able to do so without a full plan review.	
6. No clear point of contact within the NDIA for participants	Critical Issues Officer appointed in LAC until scheme maturation. LAC as 'go to person' better communicated and easier to contact the participant's LAC or NDIA planner.	<p>Participant Service Guarantee - Qualitative indicators Proposed service standards</p> <p>Provide an effective single point of contact so that participants, their families and carers only have to tell their story once and are able to build productive relationships with the NDIS. There should be a single point of contact for multiple participants in a family or other strongly connected groups of participants.</p> <p>2.44 The Australian Government and NDIA have also committed that all NDIS participants will have a single point of contact with the NDIS and the ability to have a longer plan of up to three years if their support needs are stable. This work is expected to improve participants' experiences with the NDIS as they will not have to tell their story multiple times to different people. It is also expected to support participants who are ready to develop longer-term</p>	Lane 1 The Government has committed to providing a single point of contact for NDIS participants. We are on track for all participants to be covered by the end of March 2020.	

		<p>goals to achieve better outcomes, as longer plans will provide certainty for them and the providers delivering their supports.</p> <p>2.45 This review understands that as at 30 September 2019, 93 per cent of participants now have a “My NDIS Contact”, although it is noted the single point of contact results in participants being given a contact name but generally not a direct phone number or email.</p>		
<p>7. Lack of flexibility in processes for CALD and indigenous participants.</p>	<p>Review of participant outcomes for CALD and indigenous pathway needed. Consider specialist LACs for ATSI and CALD participants if they request it.</p>	<p>Recommendation 10 The NDIA develops a comprehensive national outreach strategy for engaging with people with disability who are unaware of, or are reluctant to seek support from the NDIS, with a dedicated focus on Aboriginal and Torres Strait Islander peoples, culturally and linguistically diverse communities, and people with psychosocial disability.</p> <p>D9 In addition, the NDIA has:</p> <p>a) Simplified access to and use of interpreting services for NDIS participants, NDIA staff, the Partners in the Community workforce and providers from CALD backgrounds.</p> <p>D16 A) The NDIA has advised that ongoing training is provided to build and maintain the specialised skillset of planners and Partners and that key areas of future focus include:</p> <p>a) training in pathways service enhancements and building cultural awareness of Aboriginal and Torres Strait Islander peoples, people from CALD backgrounds, and people who identify as LGBTIQ+</p> <p>D17 The NDIA has a significant body of work underway to enhance pre-access and engagement for diverse and hard to reach populations. This work is in addition to the pathway service enhancements and local engagement strategies being implemented by NDIA state and territory offices to engage with and facilitate successful contacts between the NDIS, Aboriginal and Torres Strait Islander communities, CALD populations and people with psychosocial disability.</p> <p>D18 The NDIA has entered into 31 Aboriginal Community Controlled Organisations across Western Australia, the Northern Territory, South Australia and Queensland servicing 244 communities to employ local community connectors in remote areas. This program, referred to as the Remote Community Connector (RRC) Program, is a cultural brokerage which aims to engage, inform and assist people from Aboriginal and Torres Strait Islander backgrounds and rural and remote communities through the NDIS pathway process. The RCC program has proven to be critical in supporting the rollout of the scheme in remote and very remote regions and is in the process of expanding to more communities.</p> <p>D19 The NDIA is also undertaking targeted engagement in remote and rural schools to raise access about the NDIS. The NDIA is also working closely with the local shire, particularly Early Learning Centres to build awareness of the NDIS and identify potential participants. Engagement focuses on information exchange and building trust with elders and members of the community to build trust before being invited to work within a community.</p> <p>D20 The NDIA is also engaging of Aboriginal Community Controlled Organisations, at a national, state and territory and community level to work collaboratively on resolving issues in local communities, including the cost, availability and accessibility of culturally appropriate services, access to assessments, and build trust in the scheme and the benefits it can offer the community. A pilot program is operating in South-East Queensland to support at least 500 Aboriginal and Torres Strait Islander people to access the NDIS and through the planning process.</p>	<p>Lane 2 Expanding the Community Connectors Program to help those requiring a more tailored support to access and engage with the NDIS.</p> <p>Lane 2 Continue to implement the NDIS Information Linkages and Capacity Building (ILC) Strategy.</p>	

		<p>D21 The NDIA and Partners are also supporting local Aboriginal engagement initiatives, working with and attending local community days and events to support engagement and understanding of the NDIA, and developing targeted communication products for Aboriginal and Torres Strait Islander communities.</p> <p>D22 The NDIA has enhanced language navigation tools for the NDIS website and key NDIS participant planning information is available in languages other than English. The NDIA is also engaging with language interpreters to support their understanding of the NDIS so when they are called to support individuals from CALD backgrounds they are confident with terminology and able to assist in getting the best outcomes for that person.</p> <p>D23 The NDIA has also entered into partnerships with National Ethnic Disability Alliance to improve engagement with CALD communities in targeted locations, in particular through the Department of Social Services Humanitarian Support Program, which assists new arrivals in Australia. The NDIA is also working actively with settlement services and multicultural support services to educate and inform support workers and case manager on the NDIS, providing additional trusted people in communities to support people from culturally diverse communities to identify potential participants and support them to engage with the NDIS.</p> <p>D 24 The NDIA currently employs two Cultural Liaison officers in South east Queensland to work with CALD populations to engage, inform and assist people from CALD backgrounds through the NDIS pathway process. In time, this will be expanded to cover more communities across Australia through the national community connector program and employ local people from local communities to be trusted and informative sources supporting access to and use of the NDIS.</p> <p>Key Findings (Ch 5) Key findings More concerted efforts are needed to engage with people with disability who may be eligible for the NDIS, but have not yet connected with the NDIA. This is particularly important for Aboriginal and Torres Strait Islander people, people from CALD backgrounds and people with psychosocial disability.</p>		
<p>8. Public Guardians are not recognised as the participant’s substitute decision maker.</p> <ul style="list-style-type: none"> Individual guardians required to give 100 points identification Guardians unable to access the portal and or secure emails 	<p>Recognising the Public Advocate’s delegate as the contact person and making changes to the portal to enable access by the delegate to the participant’s plan.</p>	<p>Recommendation 1B. This review acknowledges feedback suggesting there is a need to review the nominee provisions of the NDIS Act in relation to their intersection with guardianship and administration legislation in the states and territories. This is an issue unlikely to be resolvable in isolation. Accordingly this review does not make any recommendations on this issue but consider it appropriate for governments through the DRC, to commission a review of the interoperability between Commonwealth and state and territory legislation as it applies to nominee and guardianship provisions.</p> <p>2.1 The NDIS Rules made for the purpose of the administration of the NDIS by the NDIA go to issues such as:</p> <p style="padding-left: 40px;">c. when a person should be appointed as a nominee to act on behalf of a participant</p> <p>This review only considers the operation of the NDIS Rules made for the purpose of the administration of the NDIS by the NDIA. It does not consider those made by the NDIS Quality and Safeguards Commissioner, unless there are consequential impacts arising from recommendations made in this report.</p>	<p>No comment on this recommendation in the speech.</p>	<p>This item has not been covered by the NDIS Act Review but is noted as appropriate to escalate to DRC as an interoperability issue.</p> <p>Propose the review of the nominee provisions of the NDIS Act in relation to their intersection with guardianship and administration legislation in the states and territories.</p> <p>SA is currently working with the NDIS to trial a third party Password Pilot with the OPA. This will not solve all issues but will assist Guardians in their</p>

				interaction with NDIS on behalf of clients.
<p>9. Significant wait times for home modifications. Compounded by significant shortages of providers of home modifications.</p>	<p>NDIA provide training and clear guidelines for home modifications to ensure quotes are made according to the guidelines. This will eliminate the need for re quoting.</p>	<p>The proposed timeframes on the Participant Service Guarantee are:</p> <ul style="list-style-type: none"> From 1 July 2020, new legislated timeframes should be introduced for the vast majority of the NDIA’s decision-making processes, including: the new plan amendment process, which covers the quote approval process for assistive technology and home modifications, to be completed within four weeks following the provision of information to the NDIA, except for complex circumstances 	<p>Lane 1 It is a key priority to tackle the time it is taking to approve assistive technology and home modifications for participants – whether it be a motorised wheelchair, a prosthetic or a bathroom renovation.</p> <p>Lane 1 Further enhancements, including a redesigned process for complex and non- standard assistive technology and home modification requests; assistive outreach to assist participants in getting quotes; and new complex home modification guidelines for providers, are currently on track for release and implementation during the remainder of this financial year (2019-2020)</p>	
<p>10. NDIA consent mechanisms are causing delays and double handling. For example, NDIA consent mechanisms are not allowing foster families to act on behalf of their foster children and having to contact personnel in the Dept of Child Protection (DCP).</p>	<p>Policy change required to allow eligible families, determined by DCP, to have delegated permission to liaise directly with NDIA.</p>	<p>No recommendation around this in the review report.</p> <p>It is noted in the report that this issue was not considered in the review of the Act as it falls under the NDIS Rules.</p> <p>2.2 The NDIS Rules made for the purpose of the administration of the NDIS by the NDIA go to issues such as:</p> <ul style="list-style-type: none"> d. when a person is responsible for undertaking actions and making decisions on behalf of children <p>This review only considers the operation of the NDIS Rules made for the purpose of the administration of the NDIS by the NDIA. It does not consider those made by the NDIS Quality and Safeguards Commissioner, unless there are consequential impacts arising from recommendations made in this report.</p>	<p>No comment on this recommendation in the speech.</p>	<p>There is no acknowledgement of this issue in the Minister’s speech.</p> <p>This matter sits outside of the NDIS Act review and falls under provisions in the <i>Children and Young People (Safety) Act 2017</i>. The Disability Advocate will escalate the concerns raised to the Department for Child Protection and seek clarification on the policy position.</p>
<p>11. Additional medical assessments/reports requested by the NDIA for participants exiting hospitals and forensic institutions (eg James Nash House) when expert assessments/reports already exist.</p>	<p>Templates for required information needed and training of health professionals. <i>‘Tell us what you want in a report and we will provide it.’</i></p>	<p>Recommendation 7a and 7b. The NDIS Act is amended to:</p> <p>Allow evidence provided to the NDIS about a prospective participant or participant to be used for multiple purposes under the NDIS Act, including access planning and plan review processes</p> <p>b) provide discretionary powers for the NDIA to require a prospective participant or participant to undergo an assessment for the purposes of decision making under the NDIS Act, using NDIS approved providers and in a form set by the NDIA.</p> <p>Key Findings (Ch 4):</p> <ul style="list-style-type: none"> ✓ Standardised functional capacity assessments would improve the quality and consistency of NDIA decisions. If undertaken at the point of access it would also improve the participant experience by mitigating the need for the participant to provide further information about their functional capacity later in their NDIS journey. ✓ The administrative and financial burden felt by both prospective participants and participants to provide evidence to the NDIA should be minimised. ✓ Greater clarity should be provided surrounding the requirement for, use and form of information required to support decision-making. 	<p>Lane 5 Following the success of the Independent Functional Assessment Pilot - Independent functional assessments will be fully paid for by the NDIA in the access and planning pathways from 1 July 2020</p>	<p>The recommendations do not appear to directly address the issue but assessments funded by NDIA will potentially reduce the financial burden on participants and other service sectors.</p>

		4.27 onwards: A program with a national panel of independent and appropriately skilled and qualified assessors to undertake free functional assessments will roll out across Australia from July 2020.		
12. Support coordination as an individualised component of a participant plan does not work for all participants.	Support Co-ordination also able to be offered by LAC as a choice. This will enable more agility in the Scheme to respond to participant need when required, eliminating the need to know the value of support co-ordination up front. Ongoing support co-ordination is needed for participants with complex support needs.	Recommendation 15 The NDIS Rules are amended to clarify that supports in a participants plan should be used flexibly, except in limited circumstances, such as capital support. Recommendation 16: The NDIS Rules are amended to: a) set out the factors the NDIA will consider in funding support coordination in a participant’s plan b) outline circumstances in which it is not appropriate for the providers of support coordination to be the provider of any other funded supports in a participant’s plan, to protect participants from provider’s conflicts of interest.	Lane 5 From 1 July 2020 we will aim to remove the distinction between core and capacity building so that participants and their families can use plan funding more flexibly on those supports that best meet their needs.	The conflict of interest when a service provider also offers support coordination is not fully addressed. The need for participants with ongoing complex needs to have ongoing support coordination is not addressed.
13. Accommodation-Vacancies-there is no panel or replacement mechanism managing accommodation vacancies.	An accommodation panel or mechanism for sourcing accommodation services is required.	D3 The NDIA has been working to improve access to SDA for eligible participants and with governments to improve provision of accessible and well-designed housing for people with disability. Reforms already implemented by the NDIA include: a) establishing a dedicated team to fast-track eligibility decisions b) developing an innovation plan to detail the actions that the NDIA will take to encourage more innovation in SDA and accommodation support models. D4 This work supplements the actions taken by governments to change the National Disability Insurance Scheme (Specialist Disability Accommodation) Rules 2016 to give participants greater flexibility in their choice of living arrangements, including who they live with.	Lane 6 Review of Specialist Disability Accommodation (SDA) Pricing and Payments Framework. The new SDA Design Standards were released which were the outcome of the SDA limited cost assumptions review, and a new SDA Innovation Plan.	Clarify whether changes to the SDA have meant that participants are more easily able to find out about supported accommodation vacancies.
14. SILS Quoting system is laborious and expensive	NDIA has clearer protocols for what is required in a SIL quote and simple assessment requirements.	Recommendation 14 The NDIA undertake a review of its operational guidelines when funding Supported Independent Living, with an emphasis on increasing the involvement of participants, families and carers in the decision-making process and the principles of choice and control.	No comment on this recommendation in the speech.	
15. Change of Circumstance (CoC) needs a triage approach	Managing crisis needs a separate process to COC.	Recommendation 21 The NDIS Act is amended to introduce a new Category D rule-making power giving the NDIA the ability to amend a plan in appropriate circumstances. 8.33 Access to supports already determined as reasonable and necessary should not be delayed unnecessarily. On this basis, a plan should be able to be amended, without requiring a plan review or automatically creating a new plan, in certain limited circumstances. A plan amendment would be suitable in cases where the NDIA is satisfied that the change to be made, or the new support to be added, could be considered in isolation from the other supports in the plan.	Lane 1 Participants who only require a small adjustment to their plan due to a change in circumstances, is able to do so without a full plan review.	Although there is a recommendation around plan review it does not address timeframes for urgent CoC reviews. Engage with the NDIA to raise the concerns about pressures on other support systems and the risk to participants due to a lack of crisis response/ triaging of CoC in an emergency situations.
16. Lack of transparency and data sharing to monitor and identify sticking points in the Scheme	Further breakdown of data at a jurisdictional and program level (as per Bilateral Agreement) to ensure priority action where needed.	Recommendation 24: The NDIS Independent Advisory Council develops a new independent participant satisfaction survey, with reporting included in the NDIA’s quarterly reporting to DRC. 10.43 In order to build confidence in the NDIA’s satisfaction metrics, this review considers a new measure should be implemented by the NDIA, with reporting on this measure included in the NDIA’s quarterly reports to the DRC. This should be designed independently from the NDIA,	Lane 5 The NDIA has and will continue to release new and updated data on a quarterly basis to build a clear and accurate picture of what is working in the NDIS and what challenges we need to overcome to ensure long term	

		<p>though the NDIS Independent Advisory Council could undertake this task, as part of its statutory function to bring the views of participants, carers and experts in the disability sector to the heart of the NDIS by the provision of independent advice based on the experience of its members and their networks.</p> <p>10.44 It is also expected the NDIA would embed both the qualitative and quantitative aspects of the Guarantee through its own robust quality assurance practices.</p>	<p>outcomes for participants. This builds on the DRC's transparency agenda.</p> <p>Lane 5 The DRC is developing a National Disability Data and Research Policy, with the Commonwealth already committing \$15m for the development of the National Disability Data Asset and providing \$2.5m to the Melbourne Disability Institute at Melbourne University to further develop a National Disability Research Partnership with other interested research and community organizations.</p>	
17. Many moving parts to the NDIS	<p>'Planners doing plans with delegation to sign off the plan.' LAC sticking to LAC work and not doing planning but also able to offer support co-ordination.</p>	<p>Recommendation 3 NDIS Act Review. The Commonwealth provides additional funding for people with disability to navigate the NDIS, with a review of demand to occur as part of the next review of NDIS costs, currently scheduled for 2023.</p> <p>Appendix D8 The NDIA has released three new participant booklets to support people with disability and participants throughout their journey. The booklets are intended to be a practical tool to help people learn more about the NDIS, prepare for a planning meeting and to implement their plan.</p>	<p>No comment on this recommendation in the speech.</p>	<p>All participants need access to LAC and the planning process should reside with planners.</p>
18. Concerns for the future of transport assistance.	<p>SOWG working group progresses this issue nationally as a priority. Transport is a key need which is not adequately met.</p>	<p>6.29 Further progress was also made at the DRC's October 2019 meeting in regard to improving the provision of transport supports under the NDIS and interface issues with mainstream mental health and justice systems. The DRC's key agreements in relation to Transport – DRC October 2019 meeting</p> <p>DRC agreed to interim measures to increase transport funding for NDIS participants who are significant users of taxi subsidy schemes.</p> <p>DRC agreed to the full reimbursement of states and territories for the continuation of their schemes for NDIS participants until longer-term transport support policy and funding is resolved.</p>	<p>Lane 4 DRC endorsed an approach to improve the provision of transport supports under the NDIS. This included the interim measures to increase transport funding for NDIS participants who are significant users of the taxi subsidy scheme, and full reimbursement of States and territories for the continuation of their taxi subsidy schemes for NDIS participants until longer term transport support policy and funding is resolved.</p>	
19. No clear crisis response by the NDIA or escalation pathway	<p>NDIA to formulate an escalation process for the Change of Circumstances mechanism to allow for the release of urgent funds under section 34 of the <i>NDIS Act</i>. Broader access to the NDIA after-hours crisis phone number and communication with the sector.</p>	<p>8.33 Access to supports already determined as reasonable and necessary should not be delayed unnecessarily. On this basis, a plan should be able to be amended, without requiring a plan review or automatically creating a new plan, in certain limited circumstances. A plan amendment would be suitable in cases where the NDIA is satisfied that the change to be made, or the new support to be added, could be considered in isolation from the other supports in the plan. These circumstances would be:</p> <p>a) if a participant requires crisis/emergency funding as a result of a significant change to their support needs and the CEO is satisfied that the support is reasonable and necessary</p>	<p>No comment on this recommendation in the speech.</p>	<p>This does not necessarily address the time frames for urgent CoC and for providing clear pathways when participants are in crisis.</p>
20. NDIA inability to respond quickly to	<p>LAC's to have a crisis contingency fund for a</p>	<p>No recommendation around this in the review report.</p>	<p>No comment on this recommendation in the speech.</p>	<p>There is no acknowledgement of addressing urgent CoC</p>

sudden changes in circumstances	quick response in high risk situations.			timeframes in either the Review or the Ministers speech.
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