

CONSULTATION BRIEF

Mental Health
Australia

NDIS Information, Linkages and Capacity Building (ILC) Commissioning Framework – Key Issues for Feedback

Background

In December 2015, the NDIA released the ILC Commissioning Framework, and announced that there would be a consultation process early in 2016. The Framework is available on the NDIS website ([click here](#)).

Mental Health Australia will be providing a written submission and would welcome your input, either in the NDIA's template, or by email, to ndis@mhaustralia.org, by **Monday 14 March 2016**. Following is a summary of the key issues, about which Mental Health Australia is seeking feedback.

Key Issues for Feedback

Overall, the Framework recognises that there is still a lot of work to be done in the mental health area, particularly given the reforms recently announced by the government, in response to the National Mental Health Commission's review. The Framework states:

the Agency does not consider there is sufficient clarity [in broader mental health policy] to be able to detail the exact role of ILC and the ways in which it will interact with the broader mental health system in this Consultation Draft. The Agency will continue to work closely with the Australian Government as these reforms progress.

The Framework places a priority on "delivery by people with disability for people with disability," as well as on outcomes based commissioning. However, this is dependent on ensuring that the outcomes and indicators are appropriate, as well as providing sufficient support to the NGO sector to undertake the measurement. The Framework also says that the NDIA wants to "focus on what might be done to help the sector successfully transition to an outcomes-based method of sourcing". We hope that this could lead to funding for service providers to upgrade their IT and data collection capacity.

There are a couple of areas that we are very keen to get your feedback on.



1. Will this Framework allow for appropriate assertive outreach, to ensure that hard to reach individuals who are likely to need significant assistance *before* making an NDIS access request?

The Framework says that:

many submissions mentioned people who require episodic supports or who belong to population groups traditionally difficult to engage, as people who might 'fall through the gaps'. It is important to understand that mainstream services still retain core responsibility for supporting most of these people.

2. What is your view on the proposed ILC eligibility rules?

In particular, we seek your views on the restriction on registered providers not being able to use ILC funding to assist individuals to make access requests.

NDIS registered disability service providers will be eligible to apply for ILC funding. It is entirely appropriate, for example, that organisations that have expertise in capacity building for individuals are able to both deliver services funded through an individually funded package as well as deliver activities funded through ILC. Similar expertise and experience is required for the successful delivery of both. Organisations that deliver support coordination might also possess the expertise that would allow them to deliver on ILC outcomes.

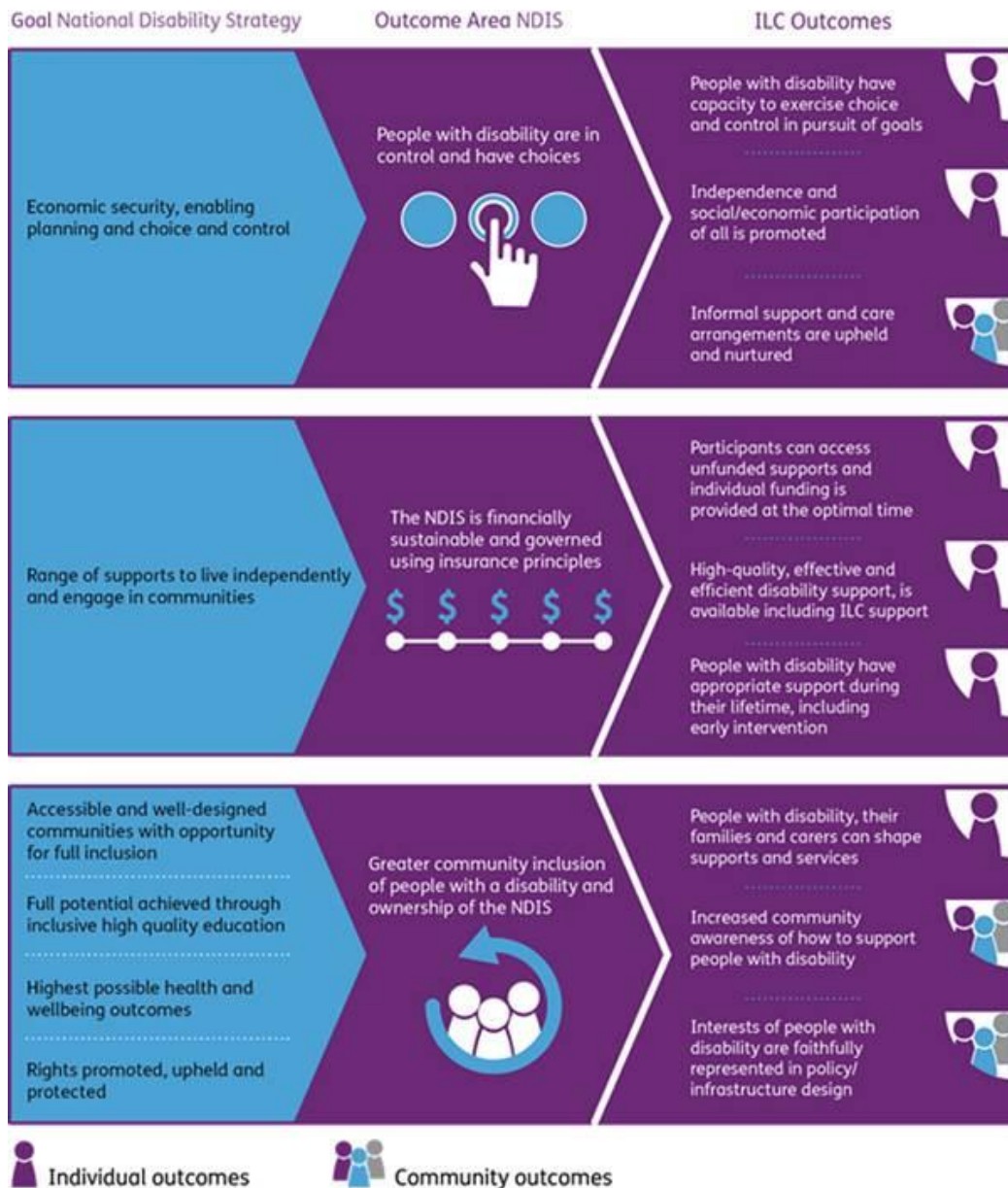
However, to avoid conflicts of interest, registered providers would not be able to use ILC funding to assist individuals to make access requests or to develop or implement NDIS plans. Recognising that some people may want support from a trusted ILC provider to help navigate the NDIS, ILC providers will not be prevented from helping an individual to develop access requests or individual funding plans with other sources of funding or volunteer support.

To avoid conflicts of interest, LAC providers will not be eligible for other ILC grant funding, other than in exceptional circumstances.

3. What do you think of the proposed ILC outcomes and measurements?

The Framework lists 9 headline ILC outcomes, which are linked back to 3 NDIS outcomes:





Under each of these outcomes, the Framework proposes a series of outputs and/or measures of outputs. The complete list is available on the NDIS website ([click here](#)). We are interested in your views on the appropriateness of each of these.

4. Based on the NDIA's questions, we are also seeking feedback on:
 - a. growing social capital in the sector, including volunteering;
 - b. how to prepare the sector for the requirements of the ILC sourcing process; and
 - c. rural and remote issues.

A complete list of the NDIA's questions is on the NDIS website ([click here](#))

