

21st February 2008

Senator the Hon Joe Ludwig
Minister for Human Services
Parliament House
Canberra 2600

Dear Senator Ludwig

Review of the Job Capacity Assessment system

In reply to your recent advice of the review of the Job Capacity Assessment system, the following comments are offered by Bendigo Access Employment Inc. As a not for profit community organisation, our mission is "to provide quality and innovative solutions that connect people's abilities to opportunities in employment, training, business and a sustainable community future". We are a Disability Employment Network provided, DEN, as well as providing the Vocational Rehabilitation Services programme, VRS and the Personal Support Programme, PSP. All following comments are offered in a spirit of improvement.

Job Capacity Assessment, JCA: A feature of the current system is the 'common referral pathway'. We note however, that this is not the 'natural pathway' that was previously a feature of the disability employment system.

- The current JCA process causes confusion and delays to job seekers as there are not enough appropriately qualified and experienced JCA's to assess job seekers in a timely manner, this is especially the case in regional areas. The lack of general medical practitioners in regional areas also causes delays to job seekers as most require a comprehensive 'Treating Doctor's Report', and there can be significant delays and cost impositions in the job seeker attaining this report.
- The JCA process is also hampered by problematic Job Capacity Assessments, a process which appears under-resourced to provide effective outcomes for clients.
- Anecdotal evidence indicates that the JCA process does not appear to be a reliable assessment, as a jobseeker can have two JCA's using the same medical evidence, with different outcomes, especially in regards to stated employment benchmarks – the JCA sometimes works well as a program streaming tool; not so well for determining employment benchmarks.

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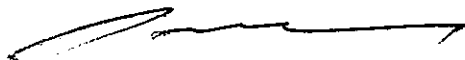
- Administration of the JCA system by the Cwth Dept of Human Services has not always seen the positive outcomes for clients, that we believe placing the program under the umbrella of DEEWR would provide. DEEWR could more effectively manage and sanction poorly performing JCA providers. Training resources able to be provided by DEEWR would also be more beneficial to individual JCA's. Past experience has shown that Job Capacity Assessors who assess job seekers with illness or medical condition outside their field of expertise/qualification often would benefit from more generic training in disability and related areas.
- Refinement of the Job Capacity Assessment system is needed as there is a high rotation of inexperienced personnel through the JCA roles which results in inappropriate referrals and wasted time that could be better utilized with appropriately placed job seekers. JCAs need a 'revamped' training program to increase their awareness of available service options, especially DEN. This 'awareness' increase would go some way to assist people with poor cognitive abilities through the JCA process, as JCA's would have increased awareness of the specialist ability of DENs to assist such clients.
- Retain 'natural pathways' to employment for clients with a disability as now there are too many barriers in place for people who are not easily able to negotiate the Centrelink/DEN/VRS interface.
- In relation to the Personal Support Programme, currently there appears to be a perverse penalization of PSP providers who successfully refer clients with multiple barriers to assessment for the Disability Support Pension when all other options have been considered. Job Capacity Assessors reviewing clients with multiple barriers have no capacity to refer jobseekers direct for DSP assessment by Centrelink, but can only refer to either PSP or Job Network. When the inevitable decision to refer to DSP is made by PSP providers, such providers are then financially penalized by the PSP outcome payment system.
- Grandfathered DSP recipients are discouraged from voluntarily looking for work via the DEN process as they must undergo a Job Capacity Assessment which may trigger a DSP review (and potentially a change to benefit entitlement). A solution to this situation is to disassociate the JCA, and the benefit review, such that any DSP benefit review occurs at least six months following successful employment engagement. [If current policy interpretation is continued with, despite industry concerns, then there needs to be a huge publicity campaign by government to explain its position in an 'easy English' format.]
- At present there appears to be too much separation in program procedures and guidelines between DHS, DEEWR and Centrelink. Many differences exist, albeit often small, creating a large administrative process that often appears to be more focused on by funders than actual job placement. What is needed is a 'joined up' approach with commonality between programs and departments to achieve the best result for the job seeker.

- Bendigo Access Employment is an example of the PAGES model that services clients need in a coordinated way. For example PSP, DEN and VRS are all programmes that are looking to rehabilitate the participants in some way on their 'journey' to work, whether it is socially, physically or vocationally; these individuals are the ones in most need of support towards employment. If we could easily progress relevant clients from one programme to the next programme without having to refer them back to a JCA each time they wish to progress in the system, it would be less confusing and time wasting for all concerned. At this stage DEN's are a complementary service in a lot of ways to Job Network services. If more flexibility was added to the three service models, we could see examples of clients moving from PSP to DEN or VRS staying within the same organisation and possibly having more success as the client sees a clearer pathway to employment. Clients may also feel that they don't have to start from scratch each time they progress through the programmes, because one organisation delivers the seamless service model they require. This may build the participant's confidence that there is a team approach to their progress, rather than feeling disconnected once they finish a programme knowing they will have to tell their story again when they front the JCA for referral to the next provider deemed suitable to their current needs. This approach recognizes that provider staff would need a 'suite' of relevant skills and qualifications to professionally meet the assessed needs of clients on their journey to employment.

Whilst there have been many recent advances in programs to assist people with a disability in gaining employment, Bendigo Access Employment welcomes the opportunity to have input into the policy direction for review of the Job Capacity Assessment system.

Please feel free to contact me should any further information be required;
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Yours sincerely



Paul Kirkpatrick

Chief Executive Officer