

## Improving the Job Capacity Assessment

February 2008

### Key Messages:

- ACE welcomes the opportunity to provide feedback to the Rudd Government on improving the Job Capacity Assessment process
- Australia's Disability Employment Network is considered world's 'best practice' by many, particularly through its work with people who have moderate to severe disability – much has been achieved over time and more could be done to equip people with disability to compete in today and tomorrow's labour market through careful consideration of existing barriers to participation
- ACE recognises the value of an independent assessment process to direct people towards appropriate programme supports however the current assessment tool, the Job Capacity Assessment, has significant shortcomings that impact on clients, disability employment services and other service providers.
- The primary issue is that the tool serves as both an assessment for income eligibility and a determinant of programme referral and this is having a serious impact on people's capacity to participate.
- Employment and related programs should be supported by an assessment and referral system which supports partnerships across providers and co-ordinated service responses which respond to jobseeker needs
- The suitability of using 'hours of capacity' to determine programme needs and employment streams should be re-considered as part of the Job Capacity Assessment review
- The Job Capacity Assessment review should not occur in isolation of the many policies that surround the process
- Clarity of the assessment process could be greatly enhanced for job seekers, ensuring they understand the purpose of the assessment and its possible outcomes
- Consideration must be given to the many implementation issues that have not been addressed since the Job Capacity Assessment process commenced in July 2006
- ACE suggests that the collection of a range of JCA-related data is required to inform the current review and future directions for the scheme (these are listed throughout this submission)
- That consideration be given to alternatives to the Job Capacity Account: re-directing the funds to where they could be best utilised, perhaps as part of a broader, more co-ordinated response to managing job seeker need
- Consideration should be given to establishing suitable 'appeal processes' for employment service providers and job seekers in regard to referral decisions
- Broader and more comprehensive consultation should be undertaken by Government to determine ways forward for the JCA

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## About ACE

ACE National Network Inc (formerly the Association of Competitive Employment and known as ACE) is the peak body for Australia's Disability Employment Network (DEN).

The aims of ACE are to:

- represent the interests of members at a national level;
- identify opportunities to get a better deal for people with disabilities participating in the workforce; *and*
- educate employers and the public about issues of disability employment.<sup>1</sup>

In furthering its aims, ACE represents the interests of service providers to government and other stakeholders. It is particularly focused on:

- government policy in relation to disability employment;
- funding issues relating to the sector;
- barriers to workforce participation; *and*
- better ways to get people with disabilities real jobs.

ACE has an ongoing commitment to promoting the work done by the Disability Employment Network and enhancing the quality of industry practice. ACE is routinely consulted on issues affecting service provision and invited to sit on a range of government reference and working groups.

## About this paper:

The comments provided in this paper come in response to Senator Ludwig's recent request for feedback on how the Job Capacity Assessment process could be improved. This paper builds on work done by ACE during 2007, most notably our 'Disability Employment Blueprint Project: Principles and Practices' paper and should therefore be read in conjunction with that document (provided as an attachment).

Given the limited time allowed for this particular review, ACE conducted a targeted consultation with members and other stakeholders in preparing this response;

- *ACE Operational Managers' Working Group*
- *Member submissions*
- *Feedback gathered during a series of face to face meetings with members in Qld, NSW, Victoria and South Australia late January / early February 2008<sup>2</sup>*
- *Preliminary results from the annual ACE 'State of the Sector' survey, which this year once again seeks members views on the Job Capacity Assessment process<sup>3</sup>*

Despite the short timeframes for this review, it is the view of ACE that many of the issues with the Job Capacity Assessment process **remain unresolved since the scheme's inception** and as a result, we are satisfied that we will be able to provide Senator Ludwig with a comprehensive overview of the limitations of current arrangements – both in terms of policy *and* process – along with recommendations for positive change.

ACE considers that this paper provides a platform for ongoing dialogue with Senator Ludwig, the Department of Human Services and DEEWR in the coming months.

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<sup>1</sup> [www.acenational.org.au](http://www.acenational.org.au)

<sup>2</sup> Conducted to gather feedback for Minister O'Connor in response to his inquiry into employment services

<sup>3</sup> This survey was recently launched by ACE and is yet to close – approximately one third of members have responded to date and their feedback will inform the views presented in this document. ACE will provide a full briefing and report to DHS and DEEWR once the survey is closed (March 7<sup>th</sup> 2008) and data analysis finalised.

## Introduction:

ACE is committed to assisting Government in the development of assessment and referral protocols to and across all employment services. With specific reference to the Job Capacity Assessment, the ACE position has consistently been that good assessment processes should ensure that jobseekers with disability are...referred to the employment service stream that best meets their needs, first time around, as often as possible. In the event that a referral error is made or a person's circumstances change, the process of re-referral to a more suitable provider should be made as easy as possible for all involved.

Disability Employment Network providers' experience has shown that even prior to the introduction of the Job Capacity Assessment there had been a long history of people being inappropriately referred to employment assistance on the basis of poor quality assessments, a lack of knowledge about disability and a lack of awareness by assessors of available service options.

Whilst ACE would agree in principle to the establishment of an assessment and referral system which serves as a 'gateway' to employment assistance, the current Job Capacity Assessment system is fraught with difficulties – several of which act as major barriers to participation for people with disability.

***From an ACE member perspective, the Job Capacity Assessment process is fraught with difficulties, for employment service providers, Job Capacity Assessors and job seekers alike. Often when it works it only does so due to the 'work-arounds' established by employment service providers and Job Capacity Assessors in an effort to secure better outcomes for job seekers.***

Key issues reported by ACE members include;

- Widespread concerns about system efficiency, effectiveness and quality
- The assessment being medically orientated rather than needs focused
- The Job Capacity Assessment process fails to adequately assist people who have poor cognitive abilities or who have poor insight into their condition, primarily as a result of the assessment's evidence requirements
- The right service 'connection' is not guaranteed, with members reporting inappropriate streaming to DEN
- Of particular concern is maintaining access to people who are considered to have no 'capacity to benefit' from DEN assistance by assessors, but not necessarily by providers, who may have specific expertise in working with groups considered to have 'high cost' needs or low work capacity
- Lack of an effective appeal process
- Overly complex or restrictive rules associated with the entire system

These problems seem to reflect;

- The limitations of the system on assessors
- The lack of assessor awareness of service types, what they do and how they operate
- The policy upon which the Job Capacity Assessment system is built – primarily having the process in place for two discrete functions (referral and income support)

Prior to responding to Senator Ludwig's specific questions about the Job Capacity Assessment, ACE would like to offer some general comments and observations about current JCA arrangements from a DEN perspective.

## ACE State of the Sector Survey 2008: preliminary results

ACE conducts a yearly survey of DEN providers known as its 'State of the Sector' survey. Whilst the closure date for this year's survey is yet to be reached, we know from survey responses received to date that the level of dissatisfaction with the overall Job Capacity Assessment process has increased in the past year. Last year 60% of survey respondents indicated they were 'Unsatisfied' or 'Very Unsatisfied' with the Job Capacity Assessment process. This year the level of dissatisfaction has reached 81.3% across respondents to date, with the level of people indicating they are 'Very Unsatisfied' alone now at 53.4%. Whilst last year some 13% of respondents provided positive feedback about the Job Capacity Assessment process, this year not one provider has indicated any level of satisfaction with the process. This is despite anecdotal evidence that providers and Job Capacity Assessment assessors are 'working things out' at a local level.

In this year's ACE survey, members once again responded to questions indicating that the JCA process is overly complicated. Views on the level of complexity are supported by the number of survey respondents (66%) who report that they attend the Job Capacity Assessment appointment with their direct registration applicants.<sup>4</sup> In addition to this, 62%<sup>5</sup> have indicated that they spend between 1 and 3 hours on pre-intake assistance for these clients, with another 29% spending more than 3 hours providing appropriate support.<sup>6</sup> The degree of complexity was further highlighted in a case study provided to ACE where it was cited that whilst the DEN provider and the Job Capacity assessor had agreed on the suitability of the referral of the assessed person to Capped DEN, somehow the 'prescriptiveness' of the assessment tool had not allowed the assessor to actually make the referral. With the best intent and good will in the world, neither the Job Capacity Assessor, Centrelink, nor the Job Capacity Assessment Helpdesk could advise on how to alter answers in the system to make the agreed appropriate referral. (ACE member feedback, received 22<sup>nd</sup> February 2008).

ACE members have repeatedly described the assessment process as rigid, overly driven by the IT system designed to support it and providing limited or no choice to the job seeker. In its current form, the Job Capacity Assessment process often leads to referrals of clients who are "confused, uninformed and often angry" (ACE member feedback, received 12<sup>th</sup> February 2008).

## Policy issues and their impact on the Disability Employment Network

As will become evident in this submission, the nature of feedback provided by ACE members is broad and relates to both JCA delivery and policy. Whilst this submission will address a range of operational matters related to the JCA, we do not believe a thorough examination of the system can be done without careful consideration of the policy which underpins its design, from a DEN perspective these being:

- Current disincentives to participation
- Some people with disability being deemed 'unemployable' by the JCA
- Maintaining the 'natural pathways' to DEN
- Allowing transfers between programmes
- Current caps on key employment and related programmes, most notably DEN and the Personal Support Programme, serving as a barrier to appropriate service referrals

### ***Current disincentives to participation:***

In May 2005, over 700,000 people in receipt of the Disability Support Pension were 'grandfathered' under legislation changes introduced by the former government under its Welfare to Work policies. Unfortunately the

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<sup>4</sup> ACE, State of the Sector survey, preliminary results, 2008.

<sup>5</sup> *ibid*

<sup>6</sup> *ibid*

changes to assessment for service which accompanied the DSP legislative changes continue to act as a disincentive to grandfathered DSP recipients from volunteering to seek employment assistance.

The degree of disincentive is evidenced by the decline in DSP volunteers referred for employment assistance over time. An overall reduction of 36% of DSP volunteers across all Federal government employment programmes and a 24% drop in referrals to the Disability Employment Network more specifically has occurred since December 2006<sup>7</sup>, when the mandatory re-assessment of DSP eligibility for voluntary jobseekers with disability was enforced. The specific impact on the Disability Employment Network of this policy is that many providers are now struggling to remain above the 90% service utilisation rate required under current DEEWR contractual arrangements, with long term service viability also of great concern to ACE members at this time<sup>8</sup>.

Voluntary participation in employment assistance is a recognised contributor to strong employment outcomes. It is important that voluntary jobseekers with disability are given every opportunity to secure and maintain work in a booming labour market. This group of potential workers, with so much to offer the Australian economy, should not be overlooked in the context of 'active' labour market policies.

**Recommendation:**

- Allow DSP volunteers automatic entry to their preferred employment service provider. That is, provide a referral 'short cut' to DEN (and VRS) services on EA3000 for DSP recipients.

Rationale: This will reduce 'red tape' and administrative burden not only for DEN but also Job Capacity Assessors and Centrelink. This would also allow rapid engagement with employment assistance by a group of voluntary and therefore highly motivated jobseekers.

***No one should be deemed unemployable:***

The Job Capacity Assessment's focus on assessing *hours* of work capacity is having an unfortunate impact upon appropriate connections to employment service options being made. One outcome of the JCA process is that people (usually volunteers on the DSP) assessed as having 0-7 hrs per week work capacity are streamed to the Job Network should they express a will to work, as they are considered ineligible for DEN services (as access to DEN is based on having the capacity to work at least 8 hrs per week, unless 'justification' is provided in the Job Capacity Assessment summary)<sup>9</sup>.

This is a highly undesirable outcome for affected jobseekers. There is no guarantee where they will be placed on the Job Network service continuum (given that they are not automatically referred to intensive assistance), nor does the Job Network member receive a payment for placing them in a job of less than 8 hours per week. The message here seems to be that whilst the government is supportive of people with potentially low work capacity volunteering for employment assistance, they will not be connected to the type of service that is most likely to get them a job (i.e., DEN). Current service arrangements mean they will simply be referred to a system that is (through no fault of its own) ill-equipped to assist them.

Australia's Disability Employment Network has much experience in working with people that many others would consider to be 'unemployable', with our sector recognised internationally for its success, particularly with people who have moderate to severe disability.<sup>10</sup> The sector has highly qualified and experienced staff whose work is informed by a 'strengths-based' approach which sees them work towards achieving strong matches between jobseekers' skills and capacities and employer requirements within the local labour market. Skilful

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<sup>7</sup> Senate Estimates, Questions on Notice, Question Numbers W1070\_07 and W178\_08

<sup>8</sup> ACE, State of the Sector survey, 2008. 83% of respondents are reporting negative impacts from this ruling and 26.6% now struggling to maintain 90% utilisation rate.

<sup>9</sup> Job Capacity Assessment Guidelines Version 4.1, Section 9.2.2

<sup>10</sup> Source: Organisation for Economic Co-operation and Development, *Transforming Disability into Ability*, 2003

use of strategies including job creation and job carving, along with tools such as the Supported Wage System mean the difference between 'sheltered' and 'open' employment for many.

Whilst many people with low work capacity may always require some level of income support, income earned from work would be a welcome addition to their household budget and serve to reduce their reliance on government and community funding.

**Recommendations:**

- Jobseekers with disability that volunteer for employment assistance should be given every opportunity to gain entry to a program which will meet their needs. The employment services system must be able to respond to the range of barriers of all jobseekers, including those with perceived low work capacity.
- Jobseekers should be streamed to DEN if they want to work, with DEN providers best placed to determine an individual's 'capacity to benefit' and subsequent referral options. DEN should then be adequately compensated for working with such clients.

***Maintaining 'natural pathways' to disability employment assistance:***

Natural pathways become considerably more important in a complex assessment and referral system, where many potential DEN clients are not easily able to negotiate the Centrelink / employment services interface.

ACE members report that 'natural pathways' to disability employment assistance have been seriously compromised since the introduction of Welfare to Work measures, specifically through the introduction of the Job Capacity Assessment process and the split of the DEN program into 'capped' and 'uncapped' streams.

DEN providers have long been advocates for the workforce participation of people with disability, with many having developed sophisticated marketing strategies to promote the value of work and the support available to make this happen through the DEN program. They have spent considerable time over many years developing strategic relationships with a range of referring bodies including; schools, business services, mental health services, the VET sector and others that act to strengthen clear pathways to work for people with disability. Under current Job Capacity Assessment policy, these links count for very little, especially for DSP recipients, where they now engage in a five stage service registration process, sometimes taking a number of months to complete. Natural pathways and rapid connection are now difficult given that providers can no longer undertake to assist potential jobseekers until the Job Capacity Assessment process is complete.

**Recommendation:**

- That careful consideration of how best to strengthen and maintain natural pathways to employment assistance is incorporated into a broader review of the Job Capacity Assessment process.

***Allow transfer between programmes:***

A major issue for DEN providers is the current process for transferring job seekers to more suitable programme options should they deem the referral inappropriate. This may occur in circumstances such as;

- The Job Capacity Assessor has made a programme recommendation which is not DEN, yet the IT system makes the referral to DEN regardless
- The jobseeker discloses additional information to the DEN provider that the DEN provider then believes should be added to the initial Job Capacity Assessment

The only means to change the referral currently is to assist the job seeker, 28 days after the first assessment, to attend another Job Capacity Assessment. Waiting such a long period of time significantly delays appropriate connections being made with the job seeker and delays appropriate interventions being actioned.

**Recommendation:**

- When there is evidence supporting a change of programme, allow providers to easily transfer clients to the programme stream that best suits their needs

***Remove the barrier to returning to Personal Support Programme:***

ACE members report that they continue to receive high numbers of referrals of people who are not 'work ready' following the completion of their Personal Support Programme. Present policy is that someone who has completed two years in the Personal Support Programme (PSP) is disallowed from returning to PSP even if some of barriers that were present on their initial presentation to Personal Support Programme remain.

**Recommendations:**

- Remove the barrier to return to the Personal Support Programme
- or
- Consider a programme of alternative supports for people who have not become work ready through the intervention of the Personal Support Programme

ACE will now specifically address the questions raised by the Minister for Human Services in his recent correspondence.

**Job Capacity Assessment Guidelines, particularly as they relate to assessment and referral guidelines*****Inappropriate referrals:***

ACE members continue to report high levels of inappropriate referrals as a result of the Job Capacity Assessment process. The primary source of this problem appears to be that there is no means for the Job Capacity Assessor to be provided with a 'background' statement as to the purpose of the assessment. This, coupled with the dual focus of the Job Capacity Assessment (that is, informing income support decisions and referral pathways) leads to a series of inappropriate actions arising including:

- Referrals to employment programmes for people only wishing to apply for the Disability Support Pension
- Young people who are at the point of moving from post-school / transition programmes into employment refused a referral (to DEN) because they are 'already in an appropriate programme of support'
- A DEN provider refers a highly disabled client with the intention of finding them open employment of a supportive nature and has the referral refused based on the 0-7 hour work capacity rule

ACE members report that they are often required to refuse referrals or dispute them<sup>11</sup>. Furthermore it appears that services are receiving referrals of people not motivated to seek work, such as people over 60 years of age with degenerative physical conditions seeking to 'retire', or students at school (over 16 years of age) who have applied for the Disability Support Pension but have no intention of leaving school.

**Recommendations:**

- Provide in the appointment diary a 'purpose of assessment' statement to allow for an exchange of information from the referrer to Job Capacity Assessor
- Seek DHS or DEEWR data on the actual level of rejected referrals from Capped DEN (and other service providers) to substantiate the degree to which referrals are inappropriate

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<sup>11</sup> ACE State of the Sector Survey, preliminary results 2008. 24.5% refuse greater than 25% of Job Capacity Assessment referrals with 41% of respondents disputing 25% or more of Job Capacity Assessment referrals received in the past 6 months.

- Seek data on the number of Job Capacity Assessment reports that are followed up with a further assessment and report in the three months following the initial Job Capacity Assessment. Again this will substantiate the degree to which assessment outcomes are inappropriate
- Re-examine key performance indicators for Job Capacity Assessors as these appear to be driving referrals to employment services even in circumstances where this may be an inappropriate outcome

Rationale: Whilst they have the capacity to do so, ACE members report that Job Capacity Assessors do not take up the option of not referring to an employment service. This causes distress to people referred to employment programmes who are not able to engage in the workforce.

***Inappropriate referrals - Referrals into Uncapped DEN stream:***

Whilst DEN has both Uncapped and Capped service streams, the rules surrounding Uncapped DEN make it much harder for a referral to occur than need be. It appears that some JCAs, with the best of intentions, are attempting to ‘thread the eye of the needle’ to ensure the referral of a person into the Uncapped DEN stream, so the person gets an *immediate service* of some sort when more appropriate service streams are full, rather than none at all (that is, a referral to DEN Capped or the Personal Support Programme would be more suitable).

**Example: Excerpt from JCA Report referring a job seeker to DEN Uncapped**

Client referred to Uncapped DEN program with the following **Medical Conditions**

- Intellectual Disability
- Depression
- Hypertension
- Obsessive Compulsive Disorder

**Acknowledged Barriers to Employment**

Psychological / psychiatric condition

Restricted ability to concentrate or deal with stressful situations

Relationship / family

3 young children have been removed from parental care by DHS, and are currently under the care of relatives.

Accommodation

Currently in emergency housing.

DEN provider recommendation: That this client be a Personal Support Programme participant with possible DEN Capped dual program due to long term support needs but not uncapped DEN. <sup>12</sup>

This ‘threading’ also often deems the person ineligible for the Disability Support Pension when this would have been the more appropriate income support payment. Uncapped DEN providers are reporting high numbers of referrals where they advise and support the person through a DSP application post-referral.

**Recommendations:**

- Seek data on the number of disputed reports in Uncapped DEN as this will substantiate the streaming issue

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<sup>12</sup> ACE Member communication, February 22<sup>nd</sup> 2008

- Seek data on the number of people who gain DSP through a second Job Capacity Assessment following an initial assessment and referral to Uncapped DEN as this will indicate the degree to which people not ready to engage with the workforce are being referred to this programme stream
- Lift the cap on DEN and Personal Support Programme (which is ultimately the cause of the problem)<sup>13</sup>

***Inappropriate referrals – specialist DEN operators:***

Specialist DEN providers have also advised that they often receive referrals inappropriate to their speciality. Whilst this has theoretically been corrected through advice in the most recent Job Connections Newsletter number 17, small changes in direction to Job Capacity Assessment assessors appear to take quite some time to become 'operationalised' and Job Capacity Assessment assessor practice to consequently alter.

**Recommendation:**

- Raise an IT flag alerting the assessor, where the speciality does not correspond with the disabilities identified in the JCA report

***DSP new claims:***

The issue of people claiming DSP who are referred before the decision is made and who later upon grant of the DSP refuse service, results in wasted time and effort for both providers and the individual concerned. Again, despite recent advice in Job Connections Newsletter number 17, DEN providers continue to report that Job Capacity Assessors are not offering voluntary referral to an employment programme for eligible individuals but rather continue to make a referral to an employment programme. In a recent phone link up of ACE members only one member indicated that their local Job Capacity Assessment assessor had implemented the new policy. They have observed a marked reduction in referrals of people applying for DSP who, following being granted the DSP, refuse service.

**Recommendation:**

- Track the number of referrals of DSP applicants per provider for the three months prior to the new ruling (effective December 2007) to the number of referrals of DSP applicants post the Newsletter's release. For those providers with unchanged referral patterns, interventions to ensure the new procedure is fully implemented should be considered

***Ensuring better connections to programmes:***

ACE members report that the most common answer to the first question often asked at intake, namely 'do you know why you are here?' is 'no'.

It appears that the explanation at the point of referral is either inadequate or not understood by the person concerned. It is recognised that language abilities or cognitive impairment may impact upon some individuals' comprehension levels, however DEN providers also report that some Job Capacity Assessment assessors are not consulting the person about the referral, opting rather to 'send a letter in the mail' advising the person they must attend an appointment with the employment service provider. Whilst this is contrary to the guidelines it does not appear to be an uncommon practice. ACE is advised by members that the referral letter often contains acronyms such as 'DEN' which make no sense to the uninitiated.

This lack of knowledge or understanding of the referral is also considered a primary cause of high levels of 'Did not attend' for intake interviews.

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<sup>13</sup> It is acknowledged that this is beyond the scope of this review. ACE has raised this matter with Minister O'Connor in separate correspondence

**Recommendations:**

- Seek DEEWR data on the number of 'Did not attend Intake interview' as this will demonstrate the degree to which referral connection to the employment service provider
- Seek DEEWR data on the number of Participation Reports submitted due to failure to attend Intake interviews with employment services to demonstrate the rate of connection for mutual obligation clients, who are mandated to attend.
- Improve referral mechanisms including the language used in documentation,
- Target Job Capacity Assessment providers with a high level of Did Not Attend Intake Assessment for improvement.

**Rationale:**

It is acknowledged that failure to attend intake is not solely due to communication issues between the job seeker and the Job Capacity Assessor, however comparisons of practice by assessors who assist most job seekers to 'make the connection' and those who do not may highlight opportunities for improvement

**Failure to utilise specialist reports:**

A number of ACE members have reported low utilisation rates of the 'specialist report' option by Job Capacity Assessors, particularly for people with cognitive deficits, mental health issues or intellectual disability. These groups of job seekers often fail to have the level of 'evidence' of their disability required for the Job Capacity Assessment. Members have suggested that due to the very nature of a specialist report, it often is difficult for a Job Capacity Assessor to organise them in the timeline provided for finalising their reports (i.e., 10 and 15 day turn around times), given that many specialists are not available at what is often short notice.

Further to this, one ACE member noted that when the specialist report had been provided for a client, they as employment service provider were denied access to it, despite the report's high relevance to supporting the job seeker in securing an appropriate job match.

**Recommendations:**

- Encourage the use of 'specialist reports' in circumstances where a standard Job Capacity Assessment is unlikely to identify individual barriers adequately
- Provide employment providers with access to relevant specialist reports
- Remove timeliness key performance indicators for Job Capacity Assessment report completion in instances where a referral is made to a specialist
- Review the DHS budget for specialist reports should any current 'cap' on funding present as a barrier to utilisation rates
- Review the current percentage target of specialist reports that Job Capacity Assessors can apply for, again, should this present as a barrier to utilisation rates

**Referrals of people with exemptions:**

Despite the guideline that Job Capacity Assessors should defer referrals to employment services for people with a greater than 5 day exemption, only 20% of ACE State of the Sector Survey respondents noted that this occurred for their service<sup>14</sup>. The remainder of respondents indicated that the longest period of exemption was 3 months or longer, with over 21% of respondents indicating that the longest period of exemption they had seen for a referral was greater than one year<sup>15</sup>.

**Recommendation:**

- Raise an IT flag to highlight when referrals should be deferred in circumstances where the Job Capacity Assessor is recommending a period of programme exemption

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<sup>14</sup> ACE, State of the Sector survey, preliminary results, 2008

<sup>15</sup> *ibid*

***Enhancing access through programme clarity:***

The ACE position on the Job Capacity Assessment process continues to be that good assessment processes should ensure that jobseekers with disability are referred to the employment service stream that best meets their needs, first time around, as often as possible, be that the Disability Employment Network, Vocational Rehabilitation, the Job Network or other appropriate options such as training or education.

The means by which this can best be achieved is by ensuring that absolute clarity is provided to Job Capacity Assessors, employment services and the broader community about what each service stream is funded to do and where the various service boundaries stop and start.

ACE continues to be routinely approached for clarification of service boundaries, particularly by organisations and individuals keen to understand what the difference between the various service streams is; for example, where do service boundaries start and end for; the Job Network, the Disability Employment Network, Business Services, vocational rehabilitation and the Personal Support Program?

Having provided such information on numerous occasions now, ACE is of the view that the way in which differences between some programs has been determined **appears arbitrary**, rendering navigation of the **system very complex**. We draw the Minister's attention specifically to the difficulty Job Capacity Assessors have reported in determining referral pathways (with one assessor previously advising that they 'only refer people with more than two years ongoing support to DEN, so at least I know they will get there').

***Things have only become more complex:***

ACE is also of the view that the introduction of Vocational Rehabilitation Services to the employment services system in July 2007 added to further referrer and assessor confusion due to the programme's distinct similarities to the DEN model.

Furthermore, the trend towards making most DEEWR-funded programs increasingly focus on achieving employment outcomes (for example, the Personal Support Program and JPET) adds to the confusion, in addition to reducing access to pre-employment support in the process for jobseekers who are simply not ready to engage with an employment service.

Generally it appears that Job Capacity Assessment assessors appear to have too little practical knowledge of what each of the employment programmes can provide. For example the definition of DEN (section 2.3 of the guidelines) is fairly generic in terms of actual supports provided by DEN.

ACE recently developed a detailed description of services provided by DEN in an effort to clearly articulate the network's key areas of focus, these being to provide eligible Australians with disability;

- Significant initial support to gain a job  
and/or
- Significant initial post placement support to become established in and retain a job  
and/or
- Significant indefinite or 'lifetime' support to perform to the level required to retain the job and / or to pursue career development opportunities<sup>16</sup>

This definition is fully outlined in the ACE Disability Employment Blueprint Project: Principles and Practices paper which seeks to clearly delineate DEN services and the nature of support provided to the job seeker to improve their chances of getting a job. For example, current Job Capacity Assessment guidelines fail to mention that DEN focuses on reverse marketing to gain employment, or that DEN may use 'job carving' to create a job that the person with disability can do.

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<sup>16</sup> ACE, Disability Employment Blueprint Project: Principles and Practices, 2008

It appears that the level of inappropriate referrals to DEN is partly impacted by lack of clarity about definition of programmes and inadequate education for Job Capacity Assessment assessors on the programme types. Definitions of programmes and streams within the programmes are too similar with differences not being explored in the Job Capacity Assessment guidelines.

**Recommendations:**

- Seek data informing about the level of inappropriate referrals to Capped DEN (and other employment streams) as indicated by the number of referrals 'rejected' by providers, where rejection is allowed in the programme guidelines.
- Seek data on the number of repeat Job Capacity Assessments that occur after the 28 day period has expired, as again this will indicate the number of inappropriate outcomes following referral to an employment service provider
- Provide further clarity of the services provided by employment services and the various target groups assisted
- Invest in more education of Job Capacity Assessment assessors about programme types, including mandatory visits to different employment programme providers in their locality
- Encourage semi-formal local feedback mechanisms amongst specialist employment programmes and Job Capacity Assessment providers. For example, one Centrelink office has instigated a forum for information sharing between Job Capacity Assessment providers, PSP, DEN and VRS providers. This is separate to the PAGES meetings that take place, and the focus is to problem solve referral issues. Reports are that this approach has worked exceedingly well at improving the quality of reports and referrals, with a consequent reduction in the number of reports that are rejected by employment service providers.

***Lack of referrals:***

ACE members report that an added complication to the inappropriate referral is the lack of referrals. In the 2008 ACE State of the Sector Survey, 68% of respondents have reported being 'unsatisfied' or 'very unsatisfied' with the rate of referrals to their Capped DEN<sup>17</sup>. Partially this is impacted by the reduced number of DSP recipients entering programme (due to the 'grandfathered DSP' volunteer issue) however this may not be the only cause of the reduction in referrals. Providers have also indicated that people are being streamed to the Job Network due to a lack of appropriate evidence presented at the Job Capacity Assessment appointment or the rules related to assessing hours of work capacity. Reduced referral numbers could inadvertently drive providers to accept referrals of people who they believe are not suitable candidates for service, which could then result in inappropriate service delivery or failure to meet employment goals. Again, the State of the Sector survey indications are that 45% of respondents are accepting referrals despite them feeling that the client is inappropriate for the programme<sup>18</sup>.

**Recommendation:**

- Improve clarity of programme definitions and do not deem anyone unemployable

***Mid-programme referrals to alternative programmes:***

For job seekers who attend a Job Capacity Assessment appointment without the knowledge of their present employment service provider, the potential for a mid-programme transfer occurs. This frequently occurs without consultation with or acknowledgement of the current employment service provider (this is contrary to present guidelines but appears to be current practice).

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<sup>17</sup> ACE State of the Sector Survey, Preliminary Results, 2008.

<sup>18</sup> *ibid*

ACE is informed that Job Capacity Assessors can access a screen indicating a current programme connection however it appears from the number of providers who raise the issue, that mid-programme transfers are not uncommon.

ACE members also report circumstances where job seekers who have *gained work* are being transferred between programme streams. At times DEN providers have agreed with the new referral, but continued to see the job seeker as they were unaware of the 'automatic exit' out of their programme and the client had not understood the new referral resulted in closure of their current employment programme.

If a provider disagrees with the programme transfer there is no avenue to appeal the decision for either the job seeker or the relinquishing DEN provider. This means that if the job seeker fails to advise of the degree of support provided to him / her by the DEN provider on the job, or fails to acknowledge that their 40 hour week job is based on productivity based wages, it is only through Centrelink appeal processes or Job Capacity Assessment re-assessment mechanisms that the difficulties that arise from the mid-programme assessment can be resolved.

For people in jobs, DEEWR has on occasion honoured that the transfer removed the ability of the organisation to have its employment outcomes recognised, allowing 'special claims' to be made in such instances. This however fails to acknowledge that it is extremely de-stabilising for the client to transfer programme streams mid-programme, especially when this results in a move to a totally new service. ACE was recently cited an example, where the mid programme transfer post DSP review, resulted in the client moving to a new service, a significantly increased distance away from home.

**Example: Mid-programme transfer (ACE Member feedback)**

**Situation:**

The client has a mental illness and had been on our caseload, for 12 months. Midway through the program, she was called in to attend a Job Capacity Assessment and then, without her input into the programme selected, was referred to the VRS program.

**Impact:**

The client became quite distressed as she wished to continue receiving support from a mental health specialist DEN provider. The client lodged a formal complaint with DEWR, requesting to be re-referred to the DEN provider. The request was unsuccessful.

**Recommendations:**

- Provide a clear IT 'flag' to the Job Capacity Assessment provider of the job seeker's present employment programme
- That the Job Capacity Assessor is required to contact the current employment service provider to ascertain the nature of assistance currently provided and to confirm the job seeker's needs
- Where the new referral is to the alternate DEN stream (that is, Uncapped to Capped or vice versa) allow the person to remain with the initial DEN programme to minimise disruption to their employment goals
- Allow providers with access to a complaints mechanism for altered programme referrals

Rationale: Job Capacity Assessors are making referrals to new programmes unaware of existing programme linkages. Opportunities to enhance assessments are also missed when the employment service provider's knowledge of the job seeker and their needs are not taken into consideration.

### ***Levels of support to get people through the process:***

DEN providers are noting that the process is so difficult for people to navigate independently that they are investing time in their 'direct registration' job seekers to ensure they successfully come through the process. The ACE State of the Sector Survey, 2008 shows the majority of respondents (62%) support job seekers for 1 to 3 hours to complete the Job Capacity Assessment process and a further 28.5% invest more than this amount of time with 66% attending Job Capacity Assessment interviews with their job seekers<sup>19</sup>. Whilst some providers have been informed by DEEWR contract managers that providing this type of support is inappropriate, they continue to do so to ensure that the Job Capacity Assessor is fully informed of the job seeker's needs, particularly if the DEN provider has prior knowledge of the job seeker, through a previous service history.

### **Recommendation:**

- Review the process to make it much simpler for Centrelink customers

## **The appropriateness and range of qualification necessary for Job Capacity Assessors to undertake assessments of people with different disabilities, including those with mental illness.**

### ***Qualifications and experience of Job Capacity Assessors:***

ACE members report that the lack of Job Capacity Assessor experience in disability fields and inappropriate matching of client disability to the Job Capacity Assessor skill base can highly influence the quality of the final Job Capacity Assessment report.

Many ACE members are reporting that the quality of Job Capacity Assessment reports are poor with many inconsistencies within the same report. 76% of ACE State of the Sector survey respondents indicate they are 'unsatisfied' or 'very unsatisfied' with the overall quality of the reports. When asked to describe what the 'best' Job Capacity Assessment reports look like on a five point scale, the majority of respondents have replied that the best reports rate as 'good'. When asked what the 'worst' Job Capacity Assessment reports look like, an overwhelming majority (85%) rate the worst reports as 'very poor' – the lowest rating on the scale<sup>20</sup>.

ACE members report that the quality and consistency of Job Capacity Assessment reports are also affected when the Job Capacity Assessor focuses on 'getting the data' entered during the interview. It is felt that Job Capacity Assessors who do this do so to save time, as they are inadequately funded to take the time needed to conduct a more comprehensive assessment.

The other factor influencing quality of report is that many Job Capacity Assessment assessors appear to be new to their profession. It appears in the time allowed to conduct an assessment (which varies from Job Capacity Assessment provider to provider); inexperienced professionals are not capable of extracting the required information, as they fail to pick up cues that a more experienced professional would.

### **Recommendations:**

- Measure the number of disputed reports against individual Job Capacity Assessors to enable tracking of assessors who consistently fail to provide adequate reports
- Measure the number of 'rejected referrals' against individual Job Capacity Assessors again, to enable tracking of assessors who consistently fail to make justified referral decisions

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<sup>19</sup> ACE State of the Sector Survey, Preliminary Results, 2008.

<sup>20</sup> ACE State of the Sector Survey, Preliminary Results, 2008. The scale for the answers to this question are excellent, good, average, poor, and very poor.

- Measure the number of 'rejected referrals' against Job Capacity Assessment service providers to enable tracking of providers who fail to adequately keep their staff informed of programme or guidelines changes
- Provide feedback to Job Capacity Assessment providers on the 'quality' of the assessments and/or number of report inconsistencies
- Match the skills of the assessor to the need of the client. (ACE suggests utilising a similar system to workers' compensation rehabilitation providers recognition systems where the provider is recognised but the assessor also is recognised for their skill base)
- Increase the funding for assessments, so that greater time is allowed per assessment

### ***Turnover of Job Capacity Assessors:***

DEN providers frequently comment on the 'turnover' of Job Capacity Assessors in their area. Consequently they are frequently dealing with inexperienced Job Capacity Assessors. This means that DEN providers are expending time and energy re-establishing relationships and re-educating the new Job Capacity Assessor about what the local DEN can provide in terms of service.

It is postulated that the cause of the turnover is lack of job satisfaction, stemming from the time demands on Job Capacity Assessors but also that the rigidity of the system leads to high levels of frustration and a perceived lack of use of the assessor's professional skills.

### **The quality of information recorded during the assessment process, including whether this is sufficient to assist agencies making decision on income support and/or employment assistance**

As noted above, ACE members report a strong dissatisfaction with the overall quality of Job Capacity Assessment reports. ACE frequently receives comments about the inconsistencies in reports, with frequent statements about the recommended referral not coinciding with the actual referral or with the hours of capacity not being consistent with the needs of the client. Providers note that these inconsistencies often occur within a single report.

Another issue is the satisfactory and consistent adherence to Job Capacity Assessment guidelines by assessors. ACE members report that adherence to guidelines does not only vary across different Job Capacity Assessment organisations, but also across different assessors within the same organisation.

Providers view the Job Capacity Assessment reports as being simply a screening tool, and as with any short interview there are occasions when an interviewer fails to obtain a vital piece of information. Unfortunately for employment service providers, there is little they can do to alter referral decisions once they have been made, even if the error is acknowledged by the Job Capacity Assessor. There are occasions when the only rectification is a further Job Capacity Assessment at a later point in time.

### **Recommendations:**

- Seek data on the number of reports and referrals rejected by Centrelink as this will assist in determining the quality of reports and decisions made by Job Capacity Assessors
- Review the quality of reports; particularly with a view to identifying inconsistencies and advising Job Capacity Assessors

### ***Failure to discuss other options beyond referral to employment service providers:***

Job Capacity Assessors are presently required to make referrals to the suite of government funded employment programmes. ACE members report that this is done on occasion without taking into consideration other options which may be more suitable for some job seekers. For example, if a young person with the support of their parent applies, for the Disability Support Pension, local education options that could be taken up prior to employment may not always be explored. Whilst raising non-employment options is not presently in the brief of the Job Capacity Assessor, ACE considers that opportunities for more appropriate referrals are being missed under current arrangements. Past arrangements for people with disability (namely the Disability Officer role within Centrelink) saw designated professionals take a more active role in the provision of advice and connections to local services, in addition to assisting on payment options.

### **Recommendations:**

- Devise incentives for Job Capacity Assessors to strengthen local community linkages and their knowledge of programmes beyond employment
- Reward Job Capacity Assessment providers when they assist people to maximise their potential by encouraging training or further education options

## **The appropriateness of arrangements to ensure attendance at Job Capacity Assessments**

ACE has received minimal feedback about this process other than 40.4% of respondents to our State of the Sector Survey indicating that they are having difficulties making appointments in the diary, due to lack of availability of assessors<sup>21</sup>.

### **Recommendation:**

- Provide IT flags for employment service providers and Centrelink which enable them to raise the issue of repeated difficulty accessing a Job Capacity Assessment diary appointment

## **The role of the Job Capacity Account programme, including the effectiveness of the current referral arrangements to the Job Capacity Account and Job Network**

### ***Interventions to be implemented through the Job Capacity Account:***

Referrals to DEN are not an option for people who have accessed the Job Capacity Account. Despite this, DEN providers continue to receive referrals of people who require interventions such as anger management, pain management and counselling, with the Job Capacity Assessor's expectation being that these services will be provided by DEN. Whilst DENs can engage in limited 'capacity building' with job seekers, the focus of DEN funding remains preparing for and securing employment, particularly in the context of current DEN outcome drivers.

Prospective DEN clients assessed as requiring 'upfront' allied health interventions could also benefit from access to the Job Capacity Account. Should the nature of the interventions be more complex, then a referral to a Vocational Rehabilitation provider may be a more appropriate option.

### **Recommendations:**

- That at a minimum, the Job Capacity Account be made accessible to prospective DEN job seekers based on assessed need

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<sup>21</sup> ACE, State of the Sector Survey, preliminary results, 2008.

- That consideration be given to alternatives to the Job Capacity Account: re-directing the funds to where they could be best utilised, perhaps as part of a broader, more co-ordinated response to managing job seeker need

## **Key strengths of the current arrangements and any lessons for the future, from your knowledge of current and past arrangements in Australia and internationally.**

Prior to the introduction of 'Welfare to Work' initiatives and the Job Capacity Assessment process, Centrelink employed Disability Officers who dealt with the enquiries of people with disability. The Disability Officer's role whilst also concerned with income support and referral to employment programmes was essentially consultative and customer focussed. They were an active resource for a person with disability to seek advice, including information about the Mobility Allowance, Pensioner Education Supplement, eligibility processes etc. Many ACE members report that the present interface with Centrelink for a person with disability is extremely discouraging as there is no longer any specific individual responsible for providing advice and assistance with navigating workforce participation pathways. Add to this the strong deterrents to participation currently in place for Disability Support Pension recipients (including the grandfathered DSP issue and subsequent DSP review arrangements) and you have a current system which presents with many opportunities for improvement.

The Disability Officer also took on the role of developing strong working partnerships with disability employment service providers, advising on and resolving referral and job seeker issues. Given that such a function no longer exists within Centrelink (or anywhere else) and was not given to Job Capacity Assessors, both DEN providers and job seekers now spend time trying to find someone within Centrelink to address their issues or concerns. Whilst this 'advocacy role' would appear to be beyond the scope of employment services, failing to assist job seekers with such issues can often slow the job search process down, as the job seeker is unable to focus on job search when they may have unresolved concerns about, for example, receiving their welfare payments the following week.

### **Recommendation:**

- Consider re-establishing roles within Centrelink akin to the former Disability Officer function

## **Other issues beyond the scope of questions asked by the Minister:**

### ***Ensuring job seeker awareness of the JCA process:***

The Job Capacity Assessment process was envisioned as an independent assessment advising on both employment referral and income assessment. Interestingly, whilst it is indeed an important pathway to assistance, it has very little recognition by the 'average' Centrelink customer.

ACE is presently supporting a research project entitled 'Disability, Welfare and Work' conducted by the Universities of Queensland and Melbourne. It was noted by one of the project's researchers that *"out of 82 participants in the interviews, just under half (36) participants did not know that they had specifically attended a JCA assessment. Some couldn't remember, some could faintly remember some meeting that they went to but couldn't remember the details, while others said that they hadn't attended a JCA meeting despite the fact that their (employment) agency confirms that they had attended."*

This probably identifies one of the first issues with Job Capacity Assessment processes, this being that the process can appear so convoluted to job seekers that they fail to recognise the process for what it is, or who is conducting the assessment or that it will indeed lead to a referral to an employment service provider. This can result in poor preparation for the Job Capacity Assessment interview and a subsequent impact on outcomes.

The researchers recently provided extracts to ACE from their interviews, with the following not uncommon:

Q: As part of the Welfare to work changes; everybody who has previously been on a disability pension is being assessed in terms of their capacity to work. Did you go through an assessment?

A: **No. I don't think so.**

Q: Over the last 12 months?

A: **No. But I can't exactly remember. Maybe. I don't know. You could ask my worker, she'd know.**

Q: Yes I did, and she said that you have been through a job capacity assessment?

A: **What with Centrelink?**

Q: No, not necessarily with Centrelink, with an assessor, someone else. Someone who asked you about your health or disability or work?

A: **Oh yeah. But I can't remember the details. I think it must have happened a while ago now. I can't tell you any more than that.<sup>22</sup>**

### ***Referrals to agencies beyond the ESA boundaries:***

Current contract arrangements for DEN do not allow for referrals to be made from outside specified Employment Service Areas (ESAs). Whilst DEN contracts have always acknowledged post code boundaries, these did not necessarily coincide with the current ESA boundaries and were also not enforced in a rigid way historically, providing for some flexibility to respond to individual job seeker circumstances and job seeker choice. Unfortunately the introduction of the Job Capacity Assessment has further reinforced boundary rigidity.

For example, a centrally located metropolitan ACE member recently advised that it can no longer receive referrals of people in outlying suburbs even if this is the job seeker's preference. This appears to be due to the generation of the available DEN provider pick list, with no possibility of the Job Capacity Assessor assisting the job seeker to connect with their preferred provider, should that provider not feature on the list.

Another member example is where a service's office is on the boundary of an ESA, but not acknowledged as just 'over the border' of the ESA. Despite job seekers using the service office locality for their major daily living transactions such as the shopping and banking, if the service fails to cover the same post codes as the home of the job seeker, then the job seeker is not offered the closest employment service provider but is instead offered one in a more further location, but still in their ESA.

### **Recommendation:**

- Seek feedback from employment service providers to determine the extent to which the 'natural flow' to their organisations has been affected by existing rigid ESA boundaries

### ***Resources directed at JCA issue resolution:***

ACE members have indicated through the ACE State of the Sector survey that they spend much time seeking to resolve Job Capacity Assessment related issues. For example, in the small number of cases where a DEN client had lost their Disability Support Pension through a Job Capacity Assessment, about 88% of respondents had invested time in assisting the client to prepare for their appeal or re-presentation to the Job Capacity Assessor<sup>23</sup>.

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<sup>22</sup> University of Queensland, personal communication, 26 February 2008

<sup>23</sup> ACE State of the Sector Survey, preliminary results, 2008.

**Recommendations:**

- Simplify and streamline Job Capacity Assessment processes
- Ensure job seekers understand the Job Capacity Assessment process
- Implement a system which readily considers additional supporting evidence/information
- Involve employment service providers in Job Capacity Assessment processes when a job seeker is connected to one

***Issue resolution processes inadequate:***

ACE members advise that current Job Capacity Assessment issue resolution processes do inadequately respond to job seeker needs. Whilst formal appeal processes are available through Centrelink, many job seeker issues are related to referral options and outcomes, *not* to income support decisions. The present referral 'appeal' process is for the job seeker to present 28 days following the first assessment for another.

**Recommendations:**

- Seek to identify the number of Job Capacity Assessment 'repeat' assessments after 28 days, as this will inform on the cases where a less than optimal outcome occurred
- Introduce a rapid resolution process for job seekers wishing to appeal referral decisions

***Rural and Remote servicing:***

In rural and remote areas, and even areas not defined as either of these but still located some distance from metropolitan areas, ACE members frequently report difficulties in relation to Job Capacity Assessment interviews that are not conducted 'face to face'. From the 2008 ACE State of the Sector survey we know that of the small number of rural remote providers who have responded to date, over 78% have indicated that referrals were either 'inappropriate' or 'highly inappropriate' following a non face to face Job Capacity Assessment<sup>24</sup>. The same question elicited no positive responses supporting non face to face Job Capacity Assessment interviews.

An example provided to ACE by a member concerns a Job Capacity Assessment conducted via 'video linkage'. The ACE member noted that Job Capacity Assessor conducting such interviews can miss important visual cues that inform assessments, in this instance that the job seeker was not wearing shoes. The assessor certainly would have also missed his strong body odour. These factors are extremely important in considering programme eligibility, and if the assessor were aware of them, the outcome (referral to DEN) may have been re-considered. Another rural and remote provider noted that whilst in their experience referrals may indeed be appropriate, Job Capacity Assessors appear to have little chance of getting the 'hours of capacity' correct when making decisions based on non face to face interviews.

**Recommendations:**

- Ensure that all Job Capacity Assessments are conducted face to face
- Adequately compensate Job Capacity Assessment providers to conduct assessments in these areas
- Allow automatic entry of DSP recipients to DEN (and VRS) programmes

**Rationale:**

Automatic entry will reduce the workload of Job Capacity Assessors, possibly freeing up time which could be better spent 'on the road' travelling to more remote locations.

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<sup>24</sup> ACE State of the Sector Survey, preliminary results, 2008. note: 19 rural and remote providers have completed the rural and remote questions in the survey. Whilst considered a small number ACE considers this a representative sample.