



Issues and Improvements for Job Capacity Assessment and Job Capacity Account

CRS Australia's response to
Minister Ludwig's request for
input.

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ISSUES AND IMPROVEMENTS FOR JOB CAPACITY ASSESSMENTS AND JOB CAPACITY ACCOUNT

CRS Australia welcomes the opportunity to provide feedback on, and suggestions for improvement to, the operation and effectiveness of Job Capacity Assessments and Job Capacity Account.


An effective and comprehensive assessment by skilled and experienced allied health practitioners with knowledge of disability and the labour market is central to optimally assisting job seekers with disabilities and other significant employment barriers. A recent OECD report states that:

‘this new approach [Job Capacity Assessment] of identifying people’s capacity to work and any barriers or impediments that prevent them from getting a job... is a more comprehensive approach than in other countries’.¹

The Australian Job Capacity Assessment (JCA) process is leading international practice and captures information from the job seeker and relevant third parties to action referral to the range of employment and related services and to inform income support eligibility determination. This approach aims to quickly identify job seeker needs and reduce the number of steps required to access appropriate employment services and income support arrangements. The core policy and intent surrounding JCA is clear and sound. JCA represents the result of significant trialling and evolution and improvement of assessment approaches that began in 2000. CRS Australia was actively involved in the initial assessment pilot and in all subsequent improvements to Australia’s assessment processes. Job Capacity Assessments have significant potential to contribute strongly to the Government’s social inclusion agenda through the expert identification of barriers faced by disadvantaged job seekers and the services required to overcome those barriers.

Unfortunately, the implementation of various Welfare to Work policy initiatives, subsequent micro policy decisions associated with employment services and income support, and some contractual arrangements have negatively impacted on the effectiveness of the JCA process to refer job seekers to the most appropriate interventions based on their assessed employment barriers and needs.

¹ OECD 2007, *Sickness, Disability and Work: Breaking the Barriers*, Vol 2 (pg 95)



There is significant policy confusion about the role of the assessment and referral process as opposed to the role of Centrelink in income support determination which is constraining effective decision making by assessors. This policy confusion is largely the result of poorly considered policy and contractual arrangements in the broader employment service and income support environment that JCA operates in, rather than the result of specific JCA policy arrangements.

In addition to the broader policy challenges and impediments, there are a range of improvements that can be made to the current pricing structure, arduous administrative and IT processes and incongruence between agency requirements that could significantly enhance the ability of JCAs to deliver effective assessment and referral outcomes.

This submission provides specific input on Job Capacity Assessments and Job Capacity Account issues in the areas of:

- Dual focus of JCA – current tensions between referral decision making and income support and employment service policy arrangement
- Job Capacity Assessment Guidelines
- Funding arrangements
- Rural and remote service delivery
- Impact of JCA arrangements on capacity to maintain referral links with health medical and community services
- Qualifications and skills of assessors
- Quality of information in the JCA process
- Role and effectiveness of Job Capacity Account
- Key strengths and lessons for the future for JCAs

About CRS Australia

- CRS Australia is the leading provider of assessment and vocational rehabilitation services in Australia.
- CRS Australia has a network of over 170 offices in metropolitan, regional and remote locations.
- We provide quality vocational rehabilitation services to people with a disability, injury or health condition.
- Over 30 per cent of services are delivered in rural and remote locations.
- We work in partnership with employers to ensure that job seekers meet requirements and are well suited to job opportunities.
- CRS Australia has been helping people with a disability, injury or health condition to get back to work for the past 65 years.
- Our qualified allied health professionals deliver high quality services to over 40,000 people every year.
- In recent years, we have helped between 9-10,000 people into long-term employment annually.
- Our vision is to remain the leading provider of vocational rehabilitation and related services in Australia.




DUAL PURPOSE OF JCA

JCA was designed to reduce the impost of repeated assessments on individuals, facilitate timely and appropriate referral to interventions to improve work capacity and provide information to better inform the determination of income support eligibility. Unfortunately, the way in which policies associated with income support arrangements and employment services eligibility have been determined and implemented has resulted in confusion about the role of the assessment process as opposed to the role of income support determination. The result is that a range of operational and policy parameters have been imposed on JCA assessments that reflect Social Security Act requirements and have subsequently constrained the effective decision making and referral actions of assessors and thus the overall effectiveness of JCA.

This compromises the effectiveness of the JCA process in referring job seekers to the most appropriate employment service to improve their work capacity and also confounds the work capacity bandwidth that can be specified for certain job seekers. For example, many referral decisions by JCA assessors are governed by whether a job seeker's disabilities are defined as permanent or temporary. These definitions reflect those established in the Social Security Act for the purposes of Disability Support Pension (DSP) eligibility whereas permanent/temporary distinctions have little bearing on whether a job seeker needs VRS or Job Network services.

Unfortunately, the way in which DEEWR referral policies operate around these definitions lead to perverse referral outcomes that severely inhibit the effectiveness of an independent JCA assessor's determination of the most appropriate referral and the work capacity bandwidth for some job seekers.

To take a typical scenario, a job seeker is assessed by the JCA assessor as requiring vocational rehabilitation services (VRS) to reach their optimal work capacity and gain employment. The job seeker has a medical diagnosis of "back problem" which must be classified as a temporary condition under Social Security rules as it is not clear that the condition will last more than two years. Given this, the job seeker must be classified as having a 'current and future work capacity of 30+ hours per week' despite the fact that this supposed 'temporary' disability actually has a material impact on their work capacity. The job seeker would clearly benefit from a comprehensive vocational rehabilitation program which may include: disability management strategies, functional capacity evaluation, physical upgrading, retraining into less manual employment and workplace assessment and modification. Under existing arrangements this job seeker can only be referred to a fixed VRS place.



If these places are unavailable in the job seeker's local area they must be referred to the Job Network.


Thus the current policy arrangements mean that there is the potential to refer job seekers independently assessed as needing specialist assistance such as VRS to a generalist employment service provider who is not equipped to meet their needs and with a work capacity determination which does not accurately reflect the impact of their full range of disabilities. This result is driven by the inappropriate application of DSP eligibility parameters to decisions governing referral to intervention and has the potential for the job seeker to be placed into the wrong type of work that may further aggravate their condition and result in them falling back onto income support and the employment participation system.

While it is recognised that assessors will always need to be aware of a range of income support policy requirements in undertaking their assessment and providing information to help inform income support determination, there is a clear need to more deliberately establish a separation between the parameters available to assessors in making decisions about referral to interventions as opposed to the judgements and definitions associated with income support eligibility determination. In the above example, if the assessor determines, on the basis of their professional judgement and experience, that the job seeker needs a specific intervention, the referral to that intervention should be actioned regardless of whether the job seeker's condition happens to meet a particular Social Security Act definition or not.

In CRS Australia's view, the policy intention of the JCA is best enabled when the qualified and experienced Assessor can make a referral based on an independent, professional assessment of the job seeker's service needs. This decision should not be restricted by the assessment of hours of capacity for work needed for income support eligibility determination or by income support definitions.

JOB CAPACITY ASSESSMENT GUIDELINES

The Job Capacity Assessment Guidelines now provide comprehensive details of the technical process required to complete a JCA. Regular updates to the guidelines have been consolidated for service providers and have resolved a range of implementation problems. Frequent changes and short implementation timeframes over the last 18 months have meant continual relearning for Assessors which has been challenging. Each change has added process requirements and led to



increased completion time for reports. Given the current pricing structure, this has placed pressure on the time available to thoroughly assess and effectively manage referrals for the job seeker.


However, it has been noted that the JCA Guidelines have become increasingly prescriptive in nature, often reflecting the compliance and micromanagement approach of DEEWR requirements around both employment services eligibility and income support requirements within which JCA operates. This overly prescriptive approach of the guidelines has removed to a large degree the capacity for professional judgement by assessors and as such also impacted on the effectiveness of the JCA process to facilitate improved outcomes for job seekers. The unfortunate result is that the Australian Government is paying health and allied health professionals to undertake these assessments and then prohibiting or significantly limiting them from applying their professional skills and experience in making decisions about job seeker intervention needs.

A good example of this situation is a job seeker who presents at the JCA assessment with an undiagnosed mental health condition and limited insight into their condition and its impact. While through the course of the assessment it is evident that the job seeker's mental health condition is a significant barrier to employment, because the condition is undiagnosed (ie there is no medical documentation to support it), under current arrangements the assessor is unable to take this barrier into account in making a referral to an employment service and in determining the job seeker's work capacity. In this example, the job seeker had to be deemed as having a full time capacity for work because the mental health condition was not able to be considered. As discussed above, this example also reflects the continuing tension and confusion within current arrangements between income support eligibility parameters and decisions about appropriate intervention needs as they apply to JCA assessor decisions.

In all likelihood this job seeker will continue to 'spin their wheels' in the participation support system without gain.

FUNDING ARRANGEMENTS

The effective conduct of JCA assessments is predicated on the use of appropriately qualified and experienced health and allied health professionals undertaking the assessments. This requirement establishes a range of costs for providers associated with the employment and use of allied health




professionals, which it is expected will be recognised by Government in the fee structures established for the conduct of these assessments.

Unfortunately the establishment of the current fee structure for JCAs did not adequately consider the current costs of employing allied health professionals in an increasingly competitive job market, nor did it fully consider the additional time and administrative imposts subsequently imposed to undertake JCAs using the DEEWR IT system, or the additional time and cost to the provider in suspending and rescheduling appointments in order to obtain additional medical information. This means that the current fee levels for JCA are marginal at best and this situation will only deteriorate as additional wage increases impact on the employment costs of allied health professionals.

The likely response of JCA providers to this increasing funding dilemma will be a forced reduction in the time that can be viably committed to the face to face assessment interview with a job seeker and the time taken to link job seekers with appropriate interventions and complete a comprehensive report of the assessment. This will increasingly impact on the effectiveness of the assessment process and the comprehensiveness of the information that can be obtained from the assessment and reported in the assessment report.

Given the central role that JCA plays in increasing employment participation and reducing income support dependency, the up front costs of the JCA assessment needs to be viewed by Government as an investment to ensure appropriate and early engagement of job seekers with the most effective interventions to increase their work capacity. Indeed this investment approach is well recognised by State and Territory Workcover authorities in the fee structures for the initial assessment of injured workers. By way of comparison, the Victorian Transport Accident Commission provides a flat rate fee of \$830 for the conduct of an initial needs assessment and rehabilitation plan. Similarly, GIO NSW provides \$539 (GST inc) for a brief Initial Needs Assessment. It should be recognised that the clients to be assisted through such Workcover assessments and any subsequent interventions are generally far less complex in terms of multiple employment barriers, period of unemployment etc than Australian Government job seekers seen through the JCA process. However, the State and Territory Workcover authorities have with experience over many years come to recognise the need for an up-front investment in a quality assessment which reflects both the time needed to conduct a thorough assessment and the costs of utilising allied health professionals.

In addition to the challenges of the current funding levels, there are also currently disincentives in the fee structure and KPIs to assessors seeking additional specialist input to inform assessments. A JCA provider who in accordance with current JCA Guidelines suspends an assessment to follow up



additional medical information incurs a cost in assessor time requirements plus this suspension then negatively impacts on the timeliness KPI under the JCA contract.

Further strategies need to be implemented to ensure that sufficient information is available to Assessors and, where it is not, the fee structure should recognise extra time incurred by Assessors to suspend and reschedule an assessment and obtain this information.

CRS Australia recommends that DHS undertake a JCA pricing review to ensure that assessments and resultant decisions are not compromised by lack of adequate funding.


Rural and remote service delivery

The delivery of JCAs in rural and remote Australia adds some additional challenges that need to be appropriately recognised in the contractual and performance arrangements for JCA.

A key challenge in rural and remote sites is often the difficulty in gaining medical information for job seekers. This is generally a reflection of the lack of rural doctors in many areas. This issue, plus the distances often involved in job seekers being seen face to face mean that in some Employment Service Areas (ESAs) the current 15 day non-metro timeliness standard can still be impossible to consistently meet.

However, the most significant challenge for remote JCAs is the cost. The JCA fee structure currently provides for a remote loading of \$99 per assessment. Given the costs of allied health professionals highlighted earlier, this equates to approximately 40 minutes travel time. Given the distances involved in many remote areas to see job seekers plus the additional costs associated with operating in these sites, the current fee structure does not adequately reflect the costs of service delivery in these areas. The result of the current situation is that providers are forced to undertake a higher proportion of telephone assessments in order to remain financially viable. Telephone assessments, while feasible, cannot possibly match a face to face assessment for the quality and comprehensiveness of the information that can be obtained. Thus, the current remote pricing arrangements are actually contributing to a poorer assessment regime in these areas of Australia.

In addition to cost, the other challenge in remote sites is the current arrangements with ESA market share. These sites due to the small population base generally involve lower volumes of JCA assessments when compared with metropolitan and regional centres. However, the current allocation of market share in such sites often has three or four JCA providers all delivering assessments across a remote ESA. This approach further reduces the potential flow of JCA referrals



and places further financial pressure on providers. Any future approach to business allocation in remote ESAs should take account of the volume of business needed to ensure that an adequate critical mass is available to ensure provider viability in such sites.

Impact of JCA process on referral links with medical and community services

CRS Australia has long-standing relationships with a number of hospitals and has developed arrangements for assessing need when an inpatient with a spinal cord injury, acquired brain injury or mental illness is referred for vocational rehabilitation services. For each of these client groups, CRS Australia has long-standing relationships with major hospitals (e.g. Prince of Wales, Royal Rehabilitation Hospital at Ryde, Westmead Hospital, Fullerton Hospital in Adelaide) to commence vocational rehabilitation planning while the person is still an inpatient. This highly successful early intervention strategy ensures careful management of the transition of vulnerable individuals from their hospital treatment into vocational rehabilitation. CRS Australia are specialists in the areas of mental health, acquired brain injury and spinal cord injury and have previously been highly successful in assisting many of these high cost job seekers back into long-term employment.

The original policy intent of JCA was to continue to recognise and support these arrangements via the direct registration process and policy established by DEEWR. However, due to a range of procedural and IT barriers, direct registration is both difficult and time consuming to manage for employment service providers and very confusing for both JCA Assessors and medical treatment providers. While it is noted that the direct registration policy is not the responsibility of the Department of Human Services, it is a policy area that directly impacts on the ability to effectively engage vulnerable job seekers early and ensure they are connected with the most appropriate intervention. This was a key underlying principle in the establishment of JCAs.

CRS Australia recommends that the Department of Human Services and DEEWR review current policy, procedures and IT arrangements associated with the direct registration of job seekers to ensure that there is a simple and a seamless process for the early engagement and transition from medical and community based services to employment services for very vulnerable job seekers and their families.




APPROPRIATENESS AND RANGE OF QUALIFICATIONS NECESSARY FOR JCA ASSESSORS

CRS Australia supports the policy that conduct of JCAs be limited to appropriately qualified health professionals. However, a health qualification alone does not necessarily guarantee the quality provision of a comprehensive assessment. It is important that Assessors not only have health or allied health professional qualifications but also a good understanding of working with people with disabilities and other employment barriers, disability management interventions, the impact of disability on employability in the current labour market, and the service delivery models of the range of employment service providers as well as local community services. The challenge for JCA Assessors is that the range of job seekers and the issues that they present with is extremely diverse and qualifications alone do not guarantee an effective assessment in this environment.

While attempts have been made to help ensure assessors are well equipped to deal with the job seeker population, current DEEWR online modules, such as that focused on working with people with mental health conditions, do not provide sufficient learning and development for assessors who do not already have experience in working with this job seeker cohort. For example, some job seekers do not disclose their disability or, particularly with mental illness or acquired brain injury, may not have insight into their disability. This situation requires a Job Capacity Assessor to carefully and respectfully explore the job seeker's circumstances and seek further information from treating medical practitioners or specialists. Inexperienced Assessors may not recognise the existence of a these conditions and can make inappropriate recommendations and referrals. This is potentially one of the contributors to the multiplicity of repeat JCAs occurring for a very vulnerable job seeker groups.

CRS Australia acknowledges that there is capacity to utilise a contributing Assessor, who has expertise in a particular area. For example, a physiotherapist may use a psychologist as a contributing Assessor when conducting a JCA for a person who has a mental illness. However, this process not only requires that the Assessor identifies the need for this additional input, it requires additional time and is not currently factored into the pricing structure, resulting in a disincentive to utilise the contributing Assessor or specialist opinion option.



CRS Australia has a rigorously structured induction and supervision process for their JCA Assessors and ensures that only experienced allied health professionals are utilised to conduct JCAs. This has resulted in positive feedback about the quality of our Assessments from a range of stakeholders.


CRS Australia recommends that all service providers are required to demonstrate how their personnel are suitably qualified and have relevant disability and labour market experience to conduct JCAs.

QUALITY OF INFORMATION RECORDED IN THE JCA PROCESS

While a comprehensive assessment of a job seeker can be achieved through effective engagement with the job seeker and use of the JCA assessor's skills and experience, the comprehensiveness of an assessment can be significantly enhanced through access to relevant information about the job seeker. CRS Australia's experience as a VRS provider receiving referrals from JCA assessors is that the quality of assessment reports vary significantly. A poor quality assessment has implications for employment service providers and Centrelink as insufficient information at referral results in lengthy additional assessment time and cost for employment services and can result in an inability by Centrelink to finalise income support eligibility. Alternatively, if it is found a short time into the job seeker's employment programme that the referral is inappropriate, a further JCA must be scheduled as this is the only option for referral to an alternative service type or different employment benchmark. This can result in unnecessary additional cost to Government, inefficient employment service provision, as well as frustrated, confused and alienated job seekers.

CRS Australia is aware that a reasonable numbers of job seekers are being referred for multiple JCAs. We have seen cases where job seekers have been subject to as many as four JCAs in the 18 months since commencement of JCAs in July 2006. The provision of four standard assessments incurs a cost of \$1012 to the Australian Government and may not necessarily result in an appropriate referral or work capacity determination, but assuredly has the outcome of a frustrated and confused job seeker. This goes against one of the key policy drivers behind the creation of JCAs - to reduce the number of assessments a job seeker is subjected to.

While not a total solution, the accuracy and comprehensiveness of JCAs could be improved by ensuring available relevant information is available to a JCA assessor at the time of assessment. For example, employment service providers are required to complete a report for each job seeker who



exits assistance, detailing the nature of assistance provided, employment barriers addressed, those barriers remaining and suggestions about the nature of any subsequent assistance the job seeker may need. While this exit report is completed on the DEEWR IT system it is not able to be viewed by JCA assessors. This clearly limits the information the assessor has in order to make any subsequent decisions about job seeker intervention needs and raises concerns for Government about its effective use of information it holds to ensure its duty of care to job seekers is met.


In a similar vein, where a job seeker's circumstances change employment service providers will refer a job seeker to a JCA for reassessment in order for the job seeker to be referred to a more appropriate intervention or to have the job seeker's work capacity bandwidths reviewed. While employment service providers can refer the job seeker to a JCA appointment using the DEEWR IT system, they are unable to use the system to provide the JCA assessor with any information or insight into the reasons why a reassessment is needed for the job seeker. This generally means the JCA assessor undertakes a reassessment with little or no information about the job seeker's interaction and experiences with the employment service provider, increasing the risk of further errors in any outcome from the assessment.

ROLE AND EFFECTIVENESS OF JOB CAPACITY ACCOUNT

The Job Capacity Account (JCAc) has proved an effective option for the provision of short term prevocational interventions for job seekers who are referred to Job Network Providers.

However, there are limitations to the operation of the current arrangements. The administration of the JCAc adds a large time impost for Assessment providers to organise and monitor the provision of services and job seeker attendance etc. There is no provision in the current JCA price structure that recognises the administrative impost and cost represented by referrals to JCAc. In other programs, such as DEEWRs wage subsidy program, providers are able to levy a \$100 administration fee for each wage subsidy. A similar arrangement should be considered for JCAc.

Our experience in delivering Job Capacity Assessments (JCA) has highlighted that there are a range of job seekers who do not necessarily need access to a two year prevocational programme such as PSP to assist with multiple prevocational barriers, but require a social casework service to address their pre-vocational barriers so that they can successfully participate in employment programmes. Many require access to medical treatments which currently have extensive waiting lists (such as



elective surgery) or scarce resources (such as mental health and drug and alcohol services) before any employment service gains are possible. Long waiting times for treatment and access to social and other related support services erode work related skills and seriously undermine a person's work identity.

There are significant levels of unmet need in assisting job seekers with a range of such barriers, particularly in rural and remote Australia. Referrals to employment services are able to be deferred while treatment and social case management needs are addressed in such cases. However, where these needs remain unmet and referrals proceed, the job seeker's prevailing health and social problems compromise their capacity to participate and can perpetuate a cycle of failure and poor targeting of Government funds.


A more intensive short term, pre-employment programme could assist people to address several barriers prior to participation in an employment program. This could include co-ordinating a range of job capacity account services or assisting to access medical treatment, engage with housing and welfare services and subsequent transition to employment service providers. This requires a similar but more extended service than is available in the JCAc approach and would be relevant to job seekers streamed to DEN and VRS as well as Job Network.

CRS Australia recommends an administration fee to cover the costs of organisation and monitoring of the provision of Job Capacity Account services.

CRS Australia recommends the development of a second Job Capacity Account category to deal with job seekers with a broader range of needs who do not require two years in PSP but require a specialised prevocational interventions before they can benefit from the full range of employment services. This extended program could be of a maximum duration of six months and could address several barriers concurrently.

KEY STRENGTHS OF THE CURRENT ARRANGEMENTS AND LESSONS FOR THE FUTURE FOR JCAS

The core policy associated with JCAs is sound and robust. JCAs are effective in identifying capacity to work, barriers to employment and in identifying the most appropriate intervention to improve work capacity.



In our role as both a JCA assessment provider and a provider of VRS CRS Australia has seen some very good outcomes achieved through the JCA process by ensuring linkage to appropriate services and achievement of correct income support for job seekers.

CASE STUDY

Bill, aged 48, had originally been granted DSP in July 2005 and was scheduled for a DSP review. He had a back injury from a work accident in March 2001. The functional impacts of this injury were such that he was unable to undertake manual labouring work. He was assessed as having a work capacity of 15-22 hours per week with intervention and referred for vocational rehabilitation.

He participated in a vocational rehabilitation programme, which included pain management, adjustment to disability counselling, vocational counselling and job seeking assistance. It was recognised he had good knowledge of cars, particularly spare parts. He was successful in gaining employment in this area for 20 hours per week.

The ability of the JCA process to provide a holistic assessment of job seeker needs by qualified and experienced allied health professionals is the key strength of JCA. It is important that any modifications or improvements to both JCA processes and the surrounding employment service and income support policy environment do not reduce the potential for JCA to deliver effective assessment and referral results.

Some lessons and challenges for the future of JCA are provided below.

Key Performance Indicators (KPIs)

CRS Australia acknowledges that KPIs are pivotal in the management of the JCA contract. However, it has been our experience that certain KPIs can drive inappropriate practice. For example, the timeliness KPI impacts on Assessors seeking specialist assessments or requesting the job seeker obtain additional medical information. Due to the time taken in gaining a specialist assessment or the job seeker seeking further medical information, the JCA will automatically be outside KPI timeframes.

CRS Australia recognises that DHS is currently taking action to review and revise KPIs and fully supports this.

Incompatible expectations across Australian Government contracts

There are currently multiple examples of the incongruence between JCA guidelines and Centrelink and DEEWR requirements. For example under current contractual requirements the JCA assessor has 10 days to complete an assessment and report. The expectation is that the job seeker should be referred to employment service providers at the time of assessment and if a job seeker is referred to VRS or JN the appointment is to be scheduled within 3 days of the assessment. However, employment service providers need a copy of the assessment report prior to their initial appointment with a job seeker and under DEEWR contractual requirements must meet with job seeker within 2 days of referral. Clearly these timeframes do not match up and there is difficulty in employment service providers meeting their timeliness KPI and receiving the completed JCA report prior to interviewing the job seeker. The incongruence results in significant additional effort required by all parties to navigate the processes to ensure the best outcome for the job seeker. At best the 'work around' can be completed without inconveniencing the individual. However job seekers do experience mixed messages and confusion about their obligations and requirements.

A further example is in the management of the JCA dispute processes. Conflicting drivers emerge when JCA providers have a KPI which demands a high referral rate for the job seekers they assess but capped place allocations across a range of programs prevents the assessor from making the appropriate referral. In addition, employment service providers have 28 days to dispute a JCA referral if they have information to indicate that it is inappropriate. However, Centrelink has a KPI to drive quick acceptance of JCA reports for benefit determination purposes. Unfortunately once Centrelink has finalised benefit determination, which may be within 14 days of the assessment, the JCA report is closed on the system and the process to re-open and change a report in the system (required by an accepted dispute) is very time consuming. Many JCA Assessors are reluctant to undertake this process thus reducing the ability of employment services to effectively dispute the referral. This situation will often result in the provider sending the job seeker for a full JCA reassessment beyond the 28 day timeframe, increasing the likelihood of a job seeker being subject to multiple assessments.

CRS Australia recommends that a process review of JCA, DEEWR and Centrelink requirements is undertaken to identify and amend areas of incongruence.



DEEWR IT System issues

A range of IT systems issues that impact on the efficiency of the JCA process. Due to their intricate nature, these issues will not be detailed here, though can be provided, in detail, if required. CRS Australia supports the policy intention of JCA however IT and process problems hinder both the report writing and referral processes.

CRS Australia recommends a review is conducted of all IT issues and resources are allocated to address these issues in a timely manner.

IN SUMMARY

We thank you for the opportunity to provide input to this important review. The core JCA process and policy has enormous potential to significantly improve the assessment and engagement of job seekers with significant employment barriers and to a large degree has done so in the 18 months it has been in operation. However, significant policy confusion around the interaction of employment services and income support arrangements and their interaction with the referral decisions of JCA assessors are currently limiting the effectiveness of JCA in ensuring a job seeker is referred to the most appropriate employment service with the most appropriate work capacity determination. This issue highlights the fact that neither the review of employment services being undertaken by Minister O'Connor or this JCA Review can be considered in isolation. The integrated nature of the issues requires a comprehensive cross-portfolio approach to ensuring that the full potential of the JCA process can be realised.