

**NDIA Assistive Technology Discussion Paper  
submission by  
Spinal Cord Injuries Australia  
February 28, 2015**



**scia**  
Spinal Cord Injuries Australia



### **Introduction:**

Spinal Cord Injuries Australia (SCIA) would like to thank the National Disability Insurance Agency for providing the opportunity to make this submission to the **NDIA Assistive Technology Discussion Paper**. SCIA anticipates that the content of this submission will be given serious consideration and SCIA would be more than happy to discuss the content, clarify the details and provide further information if required.

### **Background:**

SCIA has been providing a variety of services, programs and facilities to support people with spinal cord injury resulting in paraplegia and quadriplegia, and similar physical disabilities, in accordance to its mission statement of *"Life without Barriers"*, since SCIA was established in September 1967. SCIA is acutely aware of the ongoing tangible and intangible benefits for people with disability, their family, friends and carers with the timely provision of appropriate assistive technology (AT).

SCIA also has a long and proud history of advocating for all government disability, health, community and commercial services, programs and facilities to respond to the needs of people with disability and is encouraged that NDIA has undertaken a project to develop an AT framework. SCIA believes the outcome of this AT Discussion Paper should guide the NDIA towards an individualised, participant empowered and sustainable approach for AT service delivery, and to ensure participants are actively engaged in decision-making to exercise the choice and control in gaining access to AT solutions to meet their reasonable and necessary support needs.

Furthermore, SCIA supports the development and implementation of a cost-effective AT refurbishment and reissuing program, particularly for AT that is considered "high cost". This program would be expected to reduce the NDIA expenses, reduce the waiting time for participants to receive AT, and may provide a business opportunity for Australian Disability Enterprises (ADE), especially ADEs in rural and regional areas. This type of AT refurbishment service would also require the AT details to be managed on a central database to assist in the redistribution of it.



**Submission:**

NDIA is particularly interest in comments on the following:

- Do you think the participant capacity building framework (Attachment 2) will help participants reach their own decisions and give them better control over choices about Assistive Technology solutions?

Answer:

SCIA supports the NDIA intent of the participant capacity building framework, with the aim of assisting participants to be empowered to select their own AT and to undertake reasonable risk in doing so. We believe this will enable participants to enhance their learning and upgrade their skills in making appropriate AT choices. However, SCIA believes the capacity building framework being proposed is very complex, and although this framework might be appropriate for participants with newly acquired disability, the NDIA needs to assess each NDIS participant's individual experience, as experienced participants are often "experts" in their own AT needs. Basically, they are a very low risk in making an AT choice and thus should not be over-regulated. Regardless of the participant's experience, the process of AT assessment through to AT provision needs to ensure that participants are supported to make an "informed" choice, so they obtain AT that meets their needs and/or goals.

SCIA believes people with disability would not want AT that does not meet their needs and/or goals and SCIA is aware of reports that inappropriate AT that does not meet the individual need of the person is often abandoned. This has been the case with many state government funded AT programs that do not provide 100% funding for the cost of AT and the participant is unable to financially contribute towards the AT cost. Inappropriate AT often results in the participant not being able to reach their goals for which the AT was intended, or possibly being less independent and more reliant on other paid carers, family and friends for support. Abandoned AT is a waste of time, effort and resources, particularly financial resources. With the success of the NDIS being forged on the liberation and increased participation by people with a disability in the community – a poor choice of AT that does not meet the individuals needs has the risk of destabilising that outcome.



SCIA would like to suggest that NDIA participants be provided with every opportunity to undertake their own AT research to make an informed choice, and possibly be provided with a "checklist" of tasks they need to undertake, and issues they need to consider, when searching for AT. If the participants are applying for AT, of which is considered to be "high cost", the NDIA might require the participant to confirm all of the AT details with an appropriately qualified person, as this will help with quality assurance and safeguards.

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- How useful would it be to have access to peer support people, such as Assistive Technology Mentors?

Answer:

SCIA has provided a peer support service for people with spinal cord injury or similar physical disability for many years with great success. Peer support is being provided by people with lived experience of paraplegia or quadriplegia to people in Sydney's spinal cord injury rehabilitation units and at the people's home in the community. The SCIA Peer Support Service works closely with the SCIA Information Service, to assist the peer support workers to provide up-to-date information about the types of assistive technology products, programs and services.

As people with newly acquired spinal cord injury generally have little or no understanding of the required supports and/or AT requirements needed to increase mobility and independence through activities of daily living (ADL's) skills to achieve a life without barriers, the peer support is considered an essential service. It has prevented the old adage that 'your first chair is your worst chair' for some people with disability.

SCIA is aware of the NDIA funded AT Mentors Service being provided by the NSW Independent Living Centre (NSW ILC), which includes telephone mentoring service from the NSW ILC in Sydney, and limited face-to-face in an office in the Hunter and Tasmania trial sites. However, SCIA is unfamiliar of the NSW ILC Mentors Service operations and outcomes for NDIS participants, but SCIA anticipates the service will be reviewed. If reviewed, SCIA would like to suggest the review be done in collaboration with feedback from NDIS participants, their family and carers.

Due to the array of information and advice provided under the current SCIA Peer Support service model, SCIA would greatly appreciate the opportunity to discuss with the NDIA how it could work in collaboration with SCIA to support its Peer Support service to provide its services on a larger scale across Australia.

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- How important do you think “expert advisers” will be in assisting with assistive technology solutions and decision-making? What are the main skills and attributes you think they should have?

Answer:

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SCIA believes "expert advisers" can play an important role in assisting with AT solutions and decision-making for NDIS participants, particularly for participants who have a newly acquired disability, or in relation to providing up-to-date information on new and/or innovative AT products and services.

SCIA believes it could be extremely difficult for an expert advisor to know everything about each type of AT products, service or program, due to the vast amount of regularly used and emerging AT. SCIA would like to suggest that all stakeholders, including AT suppliers, therapists, clinicians and rehabilitation engineers need to have a minimum (or possibly measurable) level of AT knowledge, and competency, to ensure there are positive outcomes for people with disability, their family and carers. Furthermore, AT mentors and peer support officers can also play an important role as "expert advisers" due to having the lived and practical experience of using AT, and the related services and programs. And skilled AT Mentors could also work in collaboration with the other stakeholders to assist NDIS participants throughout the process between AT assessment and provision.

SCIA believes there could be a mix of AT Expert Advisers to meet the needs of the NDIS participants, who have tertiary degrees, recognition of prior learning (RPL) and AT Mentors that might be required to have a minimum number of years of personal experience in using AT and accessing AT services and programs, as well as being required to undertake training and/or in service on different types of AT every 6-12 month, or another recognised timeframe.

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- Provide suggestions for processes and/or activities to ensure that assistive technology solutions are identified correctly, with minimal error, and are effective in supporting participants to achieve their goals.

Answer:

SCIA believes that the timely provision of appropriate AT will need to consider the participant's type and level of disability, AT experience in conjunction the participant's goals, where the participant lives (urban, rural, regional or remote), the proximity of services and programs, plus a "person centred" approach will need to be implemented to ensure the AT meet their needs.

SCIA would anticipate that complex AT might require the NDIS participant to be assessed by an appropriately qualified "expert advisor", which might also require a set number of trials of the different AT brands and/or models. The trials should be done at locations where the AT is to be used including at home, schools and work, and should include manoeuvring in, through and around the areas including accessing items such as desks, sinks and doorways etc. The participant should also access the local shopping area, the built environment, and different modes of accessible transport conveyances and infrastructure, including taxis.

There are a number of off-the-shelf AT products that may not require the initial assessment for it to be provided, however, it might require the NDIS participant to be provided with setup and training of it. For example, the trackball (alternative mouse) for a computer is used by any people with significant physical disability, of which cost around \$100 retail. SCIA believes that it would be more cost-effective to simply provide this type of AT without the need for undertaking trials of three different products in conjunction with an assessment.

Furthermore, SCIA would like to suggest NDIA consider providing NDIS participants with an ex gratia tax-free payment of between \$1,000-\$5,000 to purchase various types of AT including computer peripherals, as well as software, and home appliances to assist with activities of daily living etc. SCIA believes this would also provide the "dignity of risk" for NDIS participants and support their research, assessment and purchasing process to enable a learning experience. This approach should eventually be cost effective and save NDIS funds in the long-term.



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- What do you think of the acquisition and procurement approach (including having a third party entity manage the pricing sourcing and procurement arrangements and contracted supply agreements)?

Answer:

SCIA believes that there are may be financial benefits to the NDIA in keeping the costs of AT down through the acquisition and procurement of a higher quantities of a smaller number of AT, but what will the impact and real price be?

Putting pressure on a small number of key and very large AT suppliers should yield the lower unit costs that are quoted in the *NDIA AT Discussion Paper* but that will have a narrowing effect on the range of providers bringing AT to the market. Basically, smaller AT companies will be unable to compete against the larger international companies, and with Australian produced AT being on the decline, as it has been for years, this may result in their complete demise.

If the NDIA is adopting a similar model to EnableNSW's Aids and Equipment Program (AEP), it would require the purchase or hiring of large warehousing facilities to hold the bulk purchase of AT, as well as the other ongoing related costs.

SCIA is aware of warehousing models like this in operation that are often beset with the same problematic issues such as:

- An increasingly bureaucratic approach as the agency moves towards greater control over prescriptions and seeks to ensure that every round peg (individual with a disability) fits their AT warehoused square hole.
- Increased financial costs of warehousing and stock management becomes the responsibility of the NDIA which will need to stock all the AT items, ensure that it is provided on schedule and/ or that the AT turnover is relatively quick to ensure it still has product or supply warranties. AT suppliers are well versed in analysing market trends and have pathways to ship items to, and throughout, Australia at relatively short notice as needed.



- The NDIA cannot predict the uptake of AT in the early phases of the general NDIS rollout. Our experience from the consultations in the Hunter NSW Trial site has shown that people who have been traditionally underserved with their AT needs are now asking for more. New clients that have never accessed services under traditional state based services are now appearing and will require AT support. While modelling in the NDIS launch sites should provide some data, that data still cannot predict how many people will in the end access the NDIS and what their AT needs are. Under a centralised model the costs of poor prediction are borne by the scheme rather than by suppliers.

Also, AT maintenance and repairs can be standardised easily with replacement parts being purchased as part of initial AT procurement. But if third-party maintenance and repair services are contracted by the NDIA, it is unclear how replacement parts would be fitted to the AT device and maintenance and warranty schedules maintained.

Although the Productivity Commission has estimated that around 460,000 people with disability are expected to be eligible for the NDIS by 2019, these are estimates. All of the under met AT need could be revealed within a relatively short period of time inundating the NDIA.

SCIA believes it would be better if the NDIA worked in collaboration with the AT suppliers now to develop an AT supply and maintenance/repair model to meet the future needs of NDIS participants to ensure they can be provided with AT in a timely and cost-effective manner.

SCIA believes the NDIA needs to give greater consideration to the overall costs if the NDIA was to implement an AT acquisition and procurement model similar to the EnableNSW service model. These costs include: warehousing, administration, training and development of staff, dispatch, set-up of items, returns, innovation development, product testing, information provision and on-site custom AT modifications.



- What do you think about the use of refurbished items (assuming that all appropriate health and safety procedures and necessary safeguards will be in place)?

Answer:

SCIA supports the refurbishment of specific types of AT, particularly AT that is considered to be "high cost" as well as AT that is in good condition, or its replacement parts are still available, as it may be more cost-effective to refurbish and redistribute it, as well as take less time to redistribute it compared to ordering and supplying a new piece of AT.

The provision of AT such as power wheelchairs, manual wheelchairs, electric high-low beds, lifting hoists and slings, as well as Environmental Control Units (ECUs) etc have historically been referred to as being relatively expensive. This AT "refurbishment" policy and practice is implemented effectively by EnableNSW's AEP and other Australian State Government funded equipment programs.

In February 2013, SCIA made a similar proposal the NDIA about the "refurbishment" of AT, as under the NDIS the participants become the owners of the AT. Without the introduction of an AT refurbish and re issuing policy and procedure, there is a strong possibility that any unrequired AT could be sold or given away by the participant or the participant's family or Guardian, who may be eligible to retain the money made from the sale.

Furthermore, the refurbishing, storing and reissuing of AT could be facilitated by Australian Disability Enterprises (ADE). This would also provide a business opportunity and extra work options and skills development for people with disability. The NDIA could offer AT refurbishing contracts under tender for specific urban, rural and regional areas so there are financial benefits for the NDIA, employment opportunities for people with disability working at ADEs and NDIS participants could receive the AT quicker.

Unneeded AT should be retrieved from the NDIS participant and sold by the NDIA either before or after it has been refurbished from which the revenue would be directed back into the NDIS.



- In what ways could further innovation be introduced and explored so that NDIA participants can have access to the best and brightest technical solutions?

Answer:

SCIA believes that the NDIA could further foster innovation so that NDIS participants have access to the best and brightest technical solutions using a number of avenues including:

- undertaking research and/or reviews of NDIA participants to find out what goals they would like to achieve to increase independence and if there is AT currently available that can assist that, or if there is a need to develop AT
- provide research grants to develop disability specific AT
- provide funding grants for university student challenges/competitions
- when new and/or innovative technology is developed and commercially available overseas, consider what type of assistance the NDIA could provide to ensure Australian technology companies can import/distribute it with ongoing installation, support, repairs and maintenance

Further to the above-mentioned list of questions that NDIA is seeking responses to, SCIA would like to seek clarification on the following key questions:

- Will NDIS participants be able to obtain AT from overseas if it is assessed to meet the needs and goals of the NDIS participant, regardless whether the AT has any ongoing technical support in Australia? And if not, is there any possibility of the NDIA providing incentives for Australian AT companies to import, supply and provide ongoing support for such AT?
- Will NDIS participants be deemed to "own" the AT or is there an obligation for any unneeded AT to be returned to, or arrange to be collected by, the NDIA?

Again, thank you very much for providing SCIA with the opportunity to make this submission to this very important area of assistive technology for NDIA participants. Please contact SCIA if you require clarification or further information relating to any of the information provided within this submission.

Yours sincerely,

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