



Council of Social Service of New South Wales

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The Hon Robyn Parker
General Purpose Standing Committee No. 2
Parliament House
Macquarie St
Sydney NSW 2000
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6 November 2008

Dear Ms Parker,

In providing evidence to the Committee in their Inquiry into the Program of Appliances for Disabled People (PADP) on the 1st October, NCOSS agreed to take on notice a question concerning how the PADP compares to other State and Territory Aids and Equipment Programs.

NCOSS has encountered some difficulty in gathering relevant information on the operation and performance of aids and equipment programs in other States and Territories. As such, this response is based on the best evidence available within the resources and timeframe provided.

We thank the committee for the opportunity to provide this addition evidence.

Comparing PADP to other State and Territory Aids and Equipment Programs.

In both our written submission and evidence before the committee, NCOSS has expressed particular concern about elements of PADP that relate to access and equity, in particular income-based eligibility criteria, waiting lists and copayments and other costs to consumers. We take this opportunity to provide further comment on these issues in relation to other State and Territory aids and equipment programs.

Eligibility

There is currently variation across State and Territory programs in relation to income-based eligibility criteria.

In order to be eligible for the Queensland Medical Aids Subsidy Scheme (MASS), the Tasmanian Community Equipment Scheme (CES) or the Western Australian Community Aids and Equipment Program (CAEP) applicants must have some sort of concession entitlements (e.g. Centrelink health care card). This effectively implements income restrictions consistent with the eligibility entitlements for these cards.

The current income threshold for a single person on a low income health care card is \$446 per week (approx \$23192 p.a). Given that many people with disability experience substantially higher costs of living in comparison to other members of the community, as outlined in our original submission, NCOSS would not support this eligibility framework in NSW.

Both the NTs Territory Independence and Mobility Equipment (TIME) Scheme and the ACTs equipment scheme tie eligibility for the programs to the receipt of Commonwealth income support (Centrelink payments). Consequently, eligibility for these aids and equipment programs is subject to any administrative, policy, regulation or financial inadequacies or changes within the Commonwealth income support systems. This creates an unnecessarily complex eligibility

framework for applicants, as they are in effect forced to meet two sets of eligibility requirements and their administrative implications in order to be eligible for aids and equipment. We have particular concerns that if for administrative reasons a person ceases to be eligible for or receive Commonwealth income support, this may jeopardize their eligibility for the aids and equipment program despite their being no change in need. This model also risks excluding people who may be on low incomes but not in receipt of Commonwealth income support, who otherwise would and should be able to access aids and equipment. NCOSS does not support this eligibility criteria for PADP

The Victorian Aids and Equipment Program (A&EP) does not apply income-based eligibility restrictions or income-based prioritisation (note, however, that it is a subsidy based program, which is discussed further under copayments and costs)

In considering access and equity issues, NCOSS has recommended that income-based eligibility criteria are removed from PADP, and that any exclusions only apply to very high income earners. Based on this, NCOSS would consider the eligibility criteria for the Victorian A&EP scheme to offer some consistency with our recommendation.

As stated, we would strongly discourage the committee from recommending that eligibility frameworks include reference to possession of a concession card or receipt of Commonwealth income support, as appears to be the case with the remaining States and Territories.

Waiting lists

As is the case in NSW, it is difficult to obtain waiting list information for other State and Territory aids and equipment programs. Information available suggests that most or all of the programs are currently encountering increased demand, and are anticipating demand will continue to increase in association with an ageing population.

As is the case with NSW, in many other States and Territories it appears that aids and equipment program budgets have not received complimentary increases in their recurrent budgets, the consequence of which is increasing waiting lists¹.

Copayments and costs to consumers

Programs vary in the costs that apply to consumers, in particular where the programs operate under a subsidy-based model.

In Victoria, the average gap across all items in 2004-05 was \$500, and was significantly higher for wheelchairs and home modificationsⁱⁱ. In their review of the program KPMG concluded that this gap was likely to increase, as subsidy levels were not being indexed adequately or with enough frequency. There is already evidence that people on low incomes are waiting significant periods of time for aids and equipment while they attempt to raise money to cover the gap fee.

Western Australia and Queensland also provide a subsidy-based program, but NCOSS was unable to locate any simplified or precise information on the costs to consumers (which in itself poses problems for consumers).

NCOSS has significant concerns that subsidy based models inflict significant hardship on people in low socioeconomic groups, as the gap between the subsidy provided through the program and the cost of the equipment poses a greater financial disadvantage for people on low incomes accessing aids and equipment.

NCOSS believes that such an arrangement in NSW would further exacerbate barriers to low income groups in accessing aids and equipment, and would be counterproductive to improving equity within PADP.

General

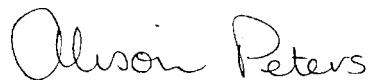
Description and comparative analysis of equipment schemes across Australia is available in both the *Review of the Program of Appliances for Disabled People* (NSW) undertaken by PricewaterhouseCoopersⁱⁱⁱ (p47-54) and the *Final Report of the Review of the Aids and Equipment Program* (Vic) undertaken by KPMG^{iv} (p66-74). For a general overview and comparison of State and Territory programs, NCOSS refers the committee to these reports.

In many ways, a comparison between the model for the PADP when compared to those of other States and Territories indicates some advantages. This does not diminish the fact that the model through which PADP operates can be significantly improved, particularly in relation to access and equity arrangements, as NCOSS outlined in our original submission and evidence before the committee.

Indeed, the fact that the model for PADP can be seen to have some advantages when compared to aids and equipment programs in other States and Territories combined with the significant waiting lists that exist for the program reinforces that the priority requirement is a substantial increase in recurrent funding for the program.

Thank you for the opportunity to provide additional evidence to the committee. Should you require any clarification or further information on this submission, please contact Kristie Brown, Senior Policy Officer Health at NCOSS on 02 9211 2599 ext 130 or Kristie@ncoss.org.au

Sincerely,



Alison Peters
Director

ⁱ VCOSS 2008, *Future Victoria: inclusive, liveable, sustainable – VCOSS State Budget Submission 2009-10*, VCOSS, Melbourne, and Muscular Dystrophy Association of Queensland, see http://www.mdaq.com.au/index.php?option=com_content&task=view&id=23&Itemid=79

ⁱⁱ KMPG 2007, *Final report of the review of the Aids and Equipment Program*, Victorian Department of Human Services, p25

ⁱⁱⁱ PricewaterhouseCoopers 2006, *Review of the program of appliances for disabled people*, NSW Health, North Sydney.

^{iv} KMPG 2007, *Final report of the review of the Aids and Equipment Program*, Victorian Department of Human Services.