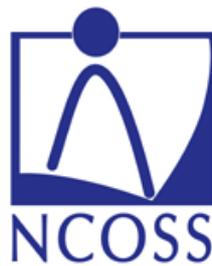


# **Submission to the NDIA Towards Solutions for Assistive Technology-Discussion Paper**

---



**6 March 2015**

**Council of Social Service of NSW (NCOSS)  
Suite 301, Level 3, 52-58 William Street East Sydney NSW 2011**

## **About NCOSS**

The Council of Social Service of NSW (NCOSS) is a peak body for the not-for-profit community sector in New South Wales. NCOSS provides independent and informed policy advice, and plays a key coordination and leadership role for the sector. We work on behalf of disadvantaged people and communities towards achieving social justice in NSW.

NCOSS provides the secretariat for the Assistive Technology Community Alliance NSW (ATCAN). The following members of the ATCAN endorse this submission:

- People with Disability Australia
- Occupational Therapy Australia;
- Carers NSW;
- Northcott Disability Services NSW;
- Cerebral Palsy Alliance;
- Spinal Cord Injuries Australia;
- Greystanes Disability Services;
- Aboriginal Disability Network;
- Physical Disability Council NSW;
- Assistive Technology Suppliers Australia; and
- The Lymphoedema Action Alliance.

## **Introduction**

Thank you for the opportunity to provide feedback on the Discussion Paper, *Towards Solutions for Assistive Technology*. Assistive technology plays an important role in enabling people with disability to live independent lives. NCOSS understands the need to investigate the potential for savings that could make assistive technology cheaper by unit price and therefore more accessible. However, we have some concerns that a focus on making savings in some areas may result in costs being down-streamed to consumers and potentially impacting on the quality of service experienced by people accessing assistive technology. This submission expands on these concerns and expresses our interest in continuing to engage in the consultation process once further details are provided.

## **Counting the costs**

The Discussion Paper notes the potential savings managed procurement can offer. The level of detail provided in the Paper does not allow for a clear assessment of which costs have been included and which may not been accounted for. For

instance, bulk procurement may require large-scale storage of items and centralised warehousing may increase freight costs.

In our view, it is important that any savings made along the supply chain are not down-streamed to the consumer who may be required to deal with a larger and potentially less agile system. Additionally, a concentration on financial savings, without any analysis of how the system will work for the person using it, runs the risk of overstating financial benefits to system managers and underestimating losses to participants. NCOSS has some concern that people may be required to self-fund services, such as equipment trials or minor adjustments that a best-price-per-unit-system may no longer provide.

NCOSS believes a transparent analysis of costs and benefits is needed to assess whether managed procurement for various types of assistive technology results in major savings across the whole system or whether pockets of savings ultimately increase costs for participants. NCOSS believes this cost-benefit analysis should be made public and subject to comment as part of the next phase of the consultation process on assistive technology.

**Recommendation 1**

The NDIA release an Assistive Technology Options Paper outlining a comprehensive cost-benefit analysis of assistive technology service delivery models being considered. This analysis should transparently show where costs are allocated to people using the system (participants).

**Quality of Service**

NCOSS is seeking a clearer understanding about the level of service people will receive if managed procurement is adopted. We note that one of the next steps of this consultation process is process mapping of participant’s access and transition through the stages of the assistive technology service delivery continuum.<sup>1</sup>

It is our view that a map showing the full continuum of service would be useful to test how some of the ideas noted in the Discussion Paper would work in practice. For example, currently equipment trials may be funded from the retail margin. If managed procurement removes the retail margin; and interactions between participants and local suppliers no longer feature under future models, there will be a need to understand how equipment trials will be provided and who will bear the cost when they do. Mapping a continuum of service will help identify any gaps in the system and allocate responsibility for costs.

---

<sup>1</sup> See page 23 of NDIA, *Towards Solutions for Assistive Technology-Discussion Paper*, December 2014.

NCOSS understand that people value the service provided by local suppliers of assistive technology because these suppliers provide a link between a range of products that work together to support them. These suppliers also offer a responsive service and can often offer alternatives where a delay in delivering a single item (such as the housing for a communication device or a suitable pressure cushion) could render a person's assistive technology products unusable.

***Recommendation 2***

Stakeholders are provided an opportunity to comment on a detailed process map of the assistive technology service framework through its inclusion in a publicly released Assistive Technology Options Paper.

**Choice and control**

NCOSS supports person-centred approaches in the delivery of supports and services for people with disability. The statement that participant choice should guide procurement rather than procurement driving choice is particularly welcome.

However, the Discussion Paper is unclear about how this goal will be met if volume purchasing is a strategy being used to reduce item costs. NCOSS is keen to understand how simple it will be for consumers to opt for alternatives to products that have been bulk purchased. Similarly, NCOSS seeks assurances that consumers will not be limited to certain brands of assistive technology products that do not represent best fit for purpose because of contractual arrangements based on minimum quantities or preferred supplier status.

***Recommendation 3***

The Assistive Technology Options Paper provides detailed information about the process participants may have to engage in to access alternative products where products that have been bulk purchased do not meet their needs.

**Rural and regional supply and service**

NCOSS welcomes comments about broadening choice and control for people in remote and regional settings and we look forward to hearing further information about innovative products that work in rough terrain and harsh climates. More generally, NCOSS believes that people in rural and regional areas of NSW must have access to timely support and service in relation to assistive technology. NCOSS encourages the NDIA to develop a service delivery framework for suppliers that ensures that people in rural and remote areas have access to choice of products, opportunities for product trials, timely deliveries; and access to repairs, returns and warranty claim options that are on par with those offered to people in metropolitan areas.

**Recommendation 4**

The NDIA develop a service delivery framework that ensures that people in rural and remote areas have access to choice of products, opportunities for product trials, timely deliveries; and access to repairs, returns and warranty claim options that are on par with those offered to people in metropolitan areas.

This framework should be included in the Assistive Technology Options Paper to provide opportunity for comment from a range of stakeholders.

**Access to legal rights**

NCOSS would like the next phase of the consultation process to include information about how any new framework for the supply of assistive technology will work in relation to the *Australian Consumer Law* and the mechanisms that will be available to resolve complaints over consumer issues including safety and quality.

**Recommendation 5**

The Assistive Technology Options Paper includes information about how any new framework works in relation to the *Australian Consumer Law* and explains the availability of mechanisms for consumers to resolve complaints.

**Participant empowerment**

NCOSS encourages the NDIA to include people with disabilities (participants) in all processes aimed at bolstering empowerment. For example, the Discussion Paper notes an intention to continue current liaison with the Allied Health Professionals Australia to facilitate participant driven/centred decision-making. NCOSS strongly recommends that the NDIA includes consumer representation in this and any other process aiming for participant empowerment. In our view, person-centred approaches can only be realised where people with disability are involved in the design and development of services, supports and resources they will use.

**Recommendation 6**

The NDIA liaise with the AHPA and consumers in to develop advisory functions and resources to facilitate person-centred decision making about assistive technology.

**Conclusion**

NCOSS thanks the NDIA for the opportunity to comment on the Discussion Paper. While the Paper has provided a useful initial view, NCOSS believes the community needs a more detailed account of how these ideas will work in practice before it can assess whether a new assistive technology service framework will benefit the people

accessing the system. We look forward to the next phase of this consultation process.

**Further Information**

Should you require any further information, please contact John Mikelsons, NCOSS Deputy CEO on 8960 7916 or [john@ncoss.org.au](mailto:john@ncoss.org.au).