



Home Safety & Comfort Pty Ltd
2/187 Lake Rd,
Port Macquarie 2444
ABN: 86081740918

5th February 2015

To Whom It May Concern,
National Disability Insurance Agency.

Dear Sir,

Home Safety & Comfort is a long established business employing 15 people over two stores in Port Macquarie and Forster. Our business is supporting our population for both people with a disability and older Australians through the supply of equipment to assist with their needs. We work very closely with all areas of the medical industry but particularly with the Allied Health professions.

I have read the National Disability Insurance Agency draft discussion paper on the supply of assistive technology for its clients released on 24th December 2014..

As a local employer who has built my business around the ethical supply of equipment to suit our clients needs and with client outcomes always at the forefront of any potential sale I have major concerns with the proposals put forward by the NDIA in its discussion paper.

My main key concerns specifically relate to the following issues.

- 1 Under this discussion paper client choice will be effectively removed for supply of assistive technology devices. This apparently contradicts the government's frequently spoken goal that the NDIS is all about consumer choice. I recognise that the discussion paper raises the possibility of clients sourcing product outside of contracted supply arrangements but this will no doubt require additional paperwork, stress and justification to enable supply of AT through their preferred supplier.
- 2 Client's choice of equipment and equipment supplier will be seriously impeded under the proposal of panel supply and preferred contracted suppliers who are most unlikely to be regionally based.
- 3 The assumption that prices will be forced down under this proposal I believe removes a key part of the price equation. At the present time all complex and most everyday equipment is trialled with the assistance of an Allied Health Professional to ensure compatibility with client needs. Equipment trials can frequently take more than 4 hours plus time to setup the equipment and travel to the relevant place of assessment.
- 4 Who will pay for the costs associated with assessments of complex equipment in regional areas where the suppliers are likely to be based in metropolitan areas?

- 5 Under contracted supply arrangements based on price, it is extremely likely that different components of a complex wheelchair and seating will be contracted to different organisations. This will lead to suppliers pushing the range they have on contract only versus the current practice of finding the most suitable piece of equipment for the client. Also it may mean that pressure relieving cushions will need to be trialled separately to the wheelchair leading to sub-optimal results.
- 6 The proposed reduction in pricing in the discussion paper has no documented justification. The Queensland Competition Authorities 2014 report into AT pricing found Australian prices were on average 24% lower than other countries.
- 7 Metropolitan or interstate suppliers are usually engrossed in the business potential of capital city areas and see a lower return on their time investment in regional areas. If prices are forced down as suggested in the discussion paper I believe it highly unlikely they will be able to make time commitment to carry out assessments in regional areas.
- 8 Allied Health Professionals will only be able to suggest a limited range of equipment to suit a clients needs and that is likely to lead to compromised outcomes.
- 9 There is likely to be a severe impact on after sales service provided to clients if regional suppliers are not involved in the supply.
- 10 The proposals are likely to result in regional employers having to reduce staff numbers due to lower turnovers.
- 11 The proposed goal of driving down prices will have serious impacts on the sustainability of the scheme. Firstly, driving down pricing will firstly force a reduction in services currently offered to clients as part of the selling price. Secondly, there is a high risk of this leading to reduced competition and in the long term that will only lead to increased prices affecting the schemes viability.

I am happy to discuss any of these issues with you personally if that will be of benefit to you.

Yours faithfully,

George King
Managing Director