



Submission in response to:

Current Scheme Implementation and Forecasting for the
NDIS

To: The Joint Standing Committee on the National
Disability Insurance Scheme

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About Assistive Technology Suppliers Australia (ATSA)

Assistive Technology Suppliers Australia (ATSA) welcomes the opportunity to provide this submission on the Current Scheme Implementation and Forecasting for the NDIS.

ATSA is a national organisation representing assistive technology (AT) suppliers, including manufacturers, importers, distributors, retailers, tradespeople and technicians. Our 157 members comprise businesses and not-for-profit organisations and range from small family-owned concerns to multinational organisations throughout Australia.

It is estimated that, excluding AT for communication and sensory disabilities, approximately 80% of the AT in Australia passes through the hands of ATSA members.

ATSA is a registered not-for-profit charity with the ACNC and requires that its members adhere to a comprehensive Code of Practice on the provision, sales and servicing of AT. We are also a member of the Australian Ethical Health Alliance.

Response from ATSA for consideration in the Interim Report

Terms of reference

- a. The impact of boundaries of NDIS and non-NDIS service provision on the demand for NDIS funding, including:
 - i. the availability of support outside the NDIS for people with disability (e.g. community-based or 'Tier 2' supports), and
 - ii. the future of the Information, Linkages and Capacity Building grants program;
- b. The interfaces of NDIS service provision with other non-NDIS services provided by the States, Territories and the Commonwealth, particularly aged care, health, education and justice services;

Consideration should be made of standards and expectation from the TGA re safety of second hand or hire of assistive technology, if the NDIA elects to promote these as a source of assistive technology for the participant.

- c. The reasons for variations in plan funding between NDIS participants with similar needs, including:
 - i. the drivers of inequity between NDIS participants living in different parts of Australia,
 - ii. whether inconsistent decision-making by the NDIA is leading to inequitable variations in plan funding, and
 - iii. measures that could address any inequitable variation in plan funding;
- d. How the NDIS is funded, including:
 - i. the current and future funding sources for the NDIS,
 - ii. the division of funding between the Commonwealth, States and Territories, and
 - iii. the need for a pool of reserve funding;
- e. Financial and actuarial modelling and forecasting of the scheme, including:
 - i. the role of insurance-based principles in scheme modelling, and
 - ii. assumptions, measures, and methodologies used to forecast and make projections about the scheme, participants, and long-term financial modelling;

In regard to Assistive Technology (AT), we believe there could be delays in the measures relating to the orders for higher risk products such as wheelchairs, beds, hoists and scooters. Following an assessment for a participant, an estimate is made for the AT the participant requires. Quotes are then obtained in if they are more than the initial estimate, there does not appear to be a trigger within the NDIS systems for this to be addressed. The participant may be left waiting for their AT and the order for that AT remains open for an extended period. This could potentially result in the assumptions and measures used for forecasting being inaccurate.

- f. The measures intended to ensure the financial sustainability of the NDIS (e.g. governance, oversight and administrative measures), including:
 - i. the role of state and territory governments, and the Disability Reform Ministers Meetings,
 - ii. the arrangements for providing actuarial and prudential advice about the scheme, and
 - iii. the way data, modelling, and forecasting is presented in public documents about the NDIS, (e.g. NDIS Quarterly Reports and Reports by the Scheme Actuary), and
 - iv. measures to ensure transparency of data and information about the NDIS;

The Quarterly Reports published by the NDIS are very helpful and informative.

We would like to see the following additional data from the Agency:

- Transparency of the approval process for Assistive Technology for participants, NDIS staff, AT suppliers and allied health professionals.
- AT type by provider on the wait list for approval and a list approved AT - available only to that provider to ensure business confidentiality.

- Delivery times broken down into time from clinical intervention and recommendation of AT, quotes issued and approved, provision of trial, new or reissued AT to participant.
- Total approvals by AT type – E.g., second hand, refurbished, new and recycled; location (LGA); reports on how NDIS has met KPIs
- Average of delivery times noted above across the industry
- Forecasts of demands for stock
- “Take up” reports on reissued AT vs new purchases
- Open submitted Quotes report that can be viewed by participants, NDIS staff, AT suppliers and allied health professionals.

Sensitivity of commercial in confidence will need to be considered when the sharing of data is actioned.

- g. The ongoing measures to reform the scheme including:
 - i. the new early childhood approach, including whether or how early intervention and other supports intended to improve a participant’s functional capacity could reduce their need for NDIS funding, and
 - ii. planning policy for personalised budgets and plan flexibility; and
- h. Any other related matters.