

11 August 2006

Mr Elton Humphrey
The Secretary
Senate Community Affairs References Committee
PO Box 6100
Parliament House
Canberra ACT 2600

Dear Mr Humphrey

Re: Inquiry into the Funding and Operation of the Commonwealth State / Territory Disability Agreement

This letter supports the submission developed by the National Industry Association for Disability Services (ACROD) and the submission provided by the Australian Blindness Forum (ABF).

Vision 2020 Australia is a national peak body representing organisations working together to eliminate avoidable blindness and reduce the impact of vision loss. With 47 member organisations involved in the full breadth of eye health and vision care, Vision 2020 Australia is strongly supportive of the emphasis in both documents which focus on improving the interface between service systems, including aged care and health.

In addition, Vision 2020 Australia wishes to emphasise support for the following themes raised in the submissions:

- The development of a national strategy for low vision and rehabilitation to complement the *National Framework for Action to Promote Eye Health and Prevent Avoidable Blindness and Vision Loss*
- A robust consistent approach to service quality and a reduced compliance burden for providers
- Measurement of quality of life outcomes
- Coordination of a national assistive technology strategy
- Need to support people who are ageing
- A stronger focus on early intervention

Development of a national strategy for low vision and rehabilitation

The submission provided by the Australian Blindness Forum explains that Vision 2020 Australia, in collaboration with the low vision and rehabilitation sector has proposed that a complementary strategy to the *National Framework for Action to Promote Eye Health and Prevent Avoidable Blindness and Vision Loss* (National Eye Health Framework) is developed. In working toward such a strategy Vision 2020 Australia has recommended the inclusion of low vision and rehabilitation initiatives in the 2007-2012 CSTDA to support the implementation of a complementary strategy. This recommendation was contained in a

paper by officers from the Australian Government's Department of Families, Community Services and Indigenous Affairs and the South Australian Office of Disability and Client Services. This matter will now be considered by the Community and Disability Services Ministers Conference out of session. The paper also contains a recommendation that the Community and Disability Services Ministers seek clarification and agreement with the Health Ministers on the specific aspects of low vision and rehabilitation which fall under each jurisdiction. Vision 2020 Australia asks that the 2007-2012 CSTDA promotes a policy environment which supports the low vision and rehabilitation service providers and consumers.

A robust and consistent approach to service quality and a reduced compliance burden for providers

A number of Vision 2020 Australia member organisations are non-government providers of low vision and rehabilitation services that are operating within complex compliance structures. Vision 2020 Australia wholeheartedly supports ACROD's position that national inconsistency imposes a compliance burden on service providers. This is particularly relevant for some member organisations that provide services across a number of states / territories.

Measurement of quality of life outcomes

Vision 2020 Australia supports the concept of measuring quality of life as opposed to quality of care as highlighted by ACROD. Further, Vision 2020 Australia are aware that the Association for the Blind in Western Australia in conjunction with Curtin University's Centre for Research into Disability and Society have expanded upon Quality of Life measurement to include a measurement of participation. The significance of this measure is that it assesses an individual's level of activity and interaction with their home environment and community.

Coordination of a national assistive technology strategy

In supporting comments in both the ABF and ACROD submissions, Vision 2020 Australia wish to highlight that assistive technologies are now critical tools, particularly for people who want to participate in education and employment. Impeding access to these tools works against larger government strategy to maximise workforce engagement and reduce service dependency.

Need to support people who are ageing

As the Australian population ages, vision impairment will also increase. If delayed retirement and home based care continues to be widely promoted in an ageing Australia, these projections must be considered. Keeping people in the workforce will mean providing improved access to adaptive technologies, transitional support, generic accessibility, and independent living skills.

A stronger focus on early intervention

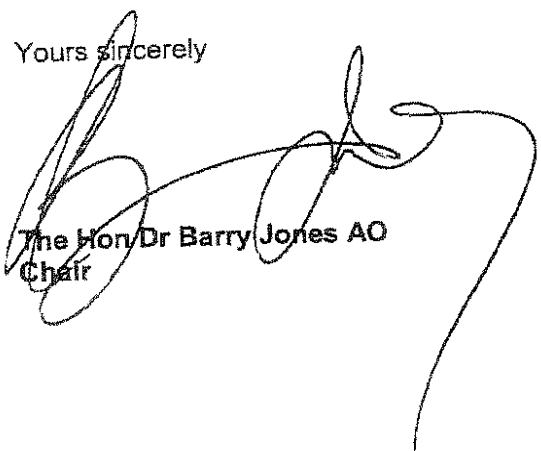
The submission provided by ABF highlights the importance of early intervention for children who are blind. Vision 2020 Australia proposes that the concept of early intervention be extended to include children, young people and those who lose their vision later in life. Accessing appropriate rehabilitation and vision care in a timely manner, regardless of age, will improve the level of an individual's active participation in their environment.

The cost of vision impairment

Clear Insight: The Economic Impact and Cost of Vision Loss in Australia is an Access Economics report developed for the Centre for Eye Research Australia. Projections in this report suggest that blindness is set to increase by 73% over the next two decades. Currently, lost earnings for people who are blind or have a vision impairment are estimated to cost the economy nearly \$1.8 million. The suffering and premature death associated with vision impairment is estimated to impose a further \$4.8 billion – the value of the loss of health life, after netting out other costs borne by people with vision impairment.

It is Vision 2020 Australia's position that low vision and rehabilitation services should be considered in the development of the next CSTDA. Initiatives which maximize the opportunities for people who are blind or have a vision impairment to actively contribute to their community and economy must be supported.

Yours sincerely



The Hon/Dr Barry Jones AO
Chair