

Submission to the Joint Standing Committee on the National Disability Insurance Scheme

Inquiry into the provision of assistive technology as part of the implementation, performance and governance of the National Disability Insurance Scheme (NDIS)

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About ARATA

The Australian Rehabilitation and Assistive Technology Association (ARATA) is the national peak body representing rehabilitation & assistive technology stakeholders. ARATA's mission is to build and sustain an inclusive assistive technology community of practice. ARATA has a proud 25 year history of practice leadership, education and professional development, systemic advocacy and contributions to policy reform¹.

ARATA has a diverse membership including assistive technology users, supporters, mentors, clinicians, engineers, designers, developers, suppliers, researchers and educators. ARATA members are passionate about equity and access to technologies as a human right and to enable individualised outcomes.

We note the purpose of the Senate Enquiry Assistive Technology is to ascertain:

- a) the transition to the NDIS and how this has impacted on speed of equipment provision;
- b) whether the estimated demand for equipment to be sourced through the assistive technology process in each roll out area was accurate;
- c) whether market based issues impact the accessibility, timeliness, diversity and availability of assistive technology;
- d) the role of the NDIA in approving equipment requests;
- e) the role of current state and territory programs in the assistive technology process;
- f) whether the regulatory frameworks governing assistive technology are fit-for-purpose, and
- g) any other related matters.

ARATA and the NDIS

ARATA take a constructive and positive approach to the NDIS and the work of building good AT policy. ARATA has been active in policy evaluation and advocacy since the Productivity Commission Report in to Disability Care and Support^{2,3}, disseminating our evaluations in the academic literature⁴. Prior to the NDIS rollout, ARATA provided an extensive blueprint as to good AT policy design within the NDIS, specifically addressing the need to provide assistive products and services in combination, the economic potential of assistive technology solutions if well-provided, the need for a definition of 'reasonable and necessary' which aligns with the World Health Organisation definition of

¹ ARATA. (2016). AATC 2016 Statements: Statement of Good Practice in Assistive Technology Provision in Australia and Issues Statement regarding Assistive Technology Provision in Australia. <http://www.arata.org.au/aatc-2018/aatc-2016-programs-and-presentations/>

² Layton, N., Steel, E.J, Friesen, E.L. and Phuah, T. (2015). ARATA's response to the NDIA's Assistive Technology Discussion Paper. Sylvan: Australian Rehabilitation and Assistive Technology Association. [http://www.arata.org.au/public/33/files/General%20information/arata_response_NDIA_AT_discussion_paper_27022015\(1\).pdf](http://www.arata.org.au/public/33/files/General%20information/arata_response_NDIA_AT_discussion_paper_27022015(1).pdf)

³ Layton, N. & Callaway, L. (2017, April). ARATA's response to the Senate inquiry into the delivery of outcomes under the National Disability Strategy (2010-2020). Silvan, Victoria: Australian Rehabilitation and Assistive Technology Association http://www.arata.org.au/public/33/files/General%20information/ARATA_NDS_Senate_Inquiry2017.pdf

⁴ Friesen, E., Walker, L., Layton, N., Astbrink, G., Summers, M., & De Jonge, D. (2015). Informing the Australian government on AT policies: ARATA's experiences. *Disability and Rehabilitation: Assistive Technology*, 10(3), 236-239. doi:10.3109/17483107.2014.913711

participation and human rights frameworks, and the priority issue of establishing a NDIS research approach to capture AT-related outcomes⁵.

ARATA's main response focusses on two aspects of the Enquiry:

- (f) the regulatory frameworks that govern assistive technology are fit-for-purpose, and
- (g) any other related matters,

ARATA propose several immediate NDIA actions, listed below. This submission concludes with a summary of 'voices from the front line' which consists of ARATA membership responses to the Enquiry questions.

Immediate actions

The NDIA should consider investment and resource development in the following:

- Assistive Technology Accreditation System
- Training and resource development
- Pricing tool/calculator

Assistive Technology Accreditation System

The assistive technology sector is under substantial stress given some of the unintended consequences of the transition to the NDIS. The move away from block funding and traditional State Government delivered services has disrupted 'practice governance': that is, the organisational structures and career pathways that developed in this system and were sustained for several decades. Practice governance enabled assistive technology practitioners to extend their knowledge, skill and experience beyond entry-level training in an environment that provided sufficient structure, support and accountability. This professional development and supervisory structure has not automatically transferred across to the private sector and supported pathways for skill development have eroded. Specific knowledge, skills and experience are now dispersed throughout the private sector amongst many smaller providers and sole traders, and in some cases lost to the sector altogether.

There is currently no credentialing system in place to identify and recognise the skills of people who deliver assistive technology services and supports. Highly specialised skills are often required to ensure optimal assistive technology outcomes. Many roles and levels of responsibility exist within the assistive technology sector including the provision of peer level support, user training and education, clinicians, suppliers and technicians. The varied roles and differing level of required skills makes it difficult, if not impossible, for planners, participants, guardians or support coordinators to identify providers with suitable levels of competency to meet their needs.

Previous work commissioned by ARATA and ATSA and funded through a DSS Sector Development Grant, has identified the need to have a system that recognises the competence of assistive

⁵ ARATA. (2012). *The ARATA 'Making a difference with AT' Papers*. Caloundra:
<http://www.arata.org.au/public/33/files/ARATA%20Background%20Papers.pdf>

technology service providers (Summers & Walker, 2013⁶). The system should “identify, develop and continually enhance high-quality practitioner and supply practices in the Australian AT sector that achieve the best outcomes for consumers and their families, and improve process and economic efficiency for funders, AT practitioners and suppliers.” (Summers & Walker, 2013, p.45). This paper provides a comprehensive review of existing systems and structures, clear justification of the need for credentialing and accreditation, and proposes a range of ways to introduce and govern credentialing and accreditation systems for assistive technology practitioners and suppliers. The next step is for the NDIA to invest the necessary funds and infrastructure to ensure a robust and meaningful system is developed and implemented.

The disruption caused by the NDIS has emphasised the need for a credentialing system to ensure that not only assistive technology products, but also assistive technology services and related supports are fit-for-purpose. Examples of the role a credentialing system can play in the assistive technology sector include to:

- assist participants to identify and connect with suitably skilled service providers;
- set minimum practice standards for assistive technology service providers;
- recognise specific skill set/s of assistive technology professionals beyond entry-level training;
- require ongoing professional development specific to AT (Summers & Walker, 2013, p.42)

As an example, an Assistive Technology Practitioner credentialing system exists with our American equivalent at the Rehabilitation Engineering and Assistive Technology Society of North America (RESNA): <https://www.resna.org/certification>.

Training and Resource Development

The disruption to the AT sector highlights the need for a credentialing system, which in turn requires suitable training, professional development and practice supervision opportunities specific to the assistive technology sector. Such opportunities are required to:

- overcome the limited quality and safeguarding role the State Government equipment schemes have played;
- recognise that entry-level clinical training is insufficient for competent assistive technology practice at all levels of complexity;
- address decreasing opportunities for professional supervision and supported practice due to the emergence of new service providers - many of whom are sole traders;
- facilitate optimal practice in the assistive technology sector, providing NDIS participants with the best possible outcomes through the use of assistive technology.

Pricing Tool/Calculator

The development of a tool for low complexity, low cost and “off-the-shelf” equipment is more realistic due to the low variance in options. Consideration must be given to the difficulty in developing a pricing calculator for complex and high cost equipment due to price and prescription variances, that may not be determined until an assessment and trials have been completed. A

⁶ Summers, M., & Walker, L. (2013). *National credentialing and accreditation for assistive technology practitioners and suppliers: An options paper*. Parramatta: Assistive Technology Suppliers Australasia and Australian Rehabilitation and Assistive Technology Association. Retrieved from: http://www.arata.org.au/public/33/files/General%20information/AT%20AccreditationOptionsPaper2_2FNRMN.pdf

pricing calculator for complex equipment should only be considered once a tool has been successfully implemented for low complexity AT.

There are existing peak bodies and resources from within the assistive technology sector that should be funded by the NDIA to progress the development of a pricing tool. Foremost is the National Equipment Database (www.askned.com.au) - the largest national government funded provider of impartial advice on assistive technology products and services in Australia. Information is mediated by health practitioners who provide advice and education as to person-technology fit, in the form of annotated descriptions of products based upon an internationally recognised classification system. Assistive technology practitioners and AT users currently utilise the National Equipment Database to canvass market options and determine a shortlist of relevant products and suppliers.

At present, suppliers must be contacted directly to obtain prices. Pricing capability within NED is evolving and recent enhancements have enabled price information provided by suppliers to be uploaded directly into NED. ILCWA as the lead agency for the National Equipment Database, is embarking on supplier engagement to provide pricing for National Equipment Database. Recent successful NDIA Information, Linkages and Capacity Building Funding for the National Equipment Database will allow a project to continue to explore requirements from an AT end user and supplier perspective.

Voices from the frontline: ARATA membership contributions

ARATA invited its national membership to provide further insights and feedback into the experience of members working in the AT sector and with NDIS participants. A summary of those responses is included below.

- a) How has the transition to the NDIS impacted on the speed of equipment provision?
 - ARATA members reported that the speed of equipment provision has been slower primarily due to the period between an AT Report being submitted and the NDIA approving the request so a purchase order can be placed.
 - Wait times up to 12 months have been reported due to factors including increased demand for AT, poor communication between the NDIS and state-based equipment funders, poor prioritisation and inconsistent decision making, especially with urgent requests.
 - Once an order has been placed with the AT supplier, the speed of delivery is generally the same as before the NDIS roll-out, but the process lacks checkpoints and transparency for participants, suppliers and providers to follow progress
- b) Has the estimated demand for equipment sourced through the assistive technology process in each roll out area been accurate?
 - ARATA members do not have access to the statistics regarding the estimated increase in demand for AT, but consider they were likely underestimated. Members reported that they have worked with many participants who have not had adequate assistive technology supports included in their NDIS plans, including the omission of consumables for level 1 and 2 equipment despite having other high cost AT included. Clinical members reported an increased

demand for their services, but this was not necessarily reflected at the AT supply level, possibly due to delays as per point a).

c) What market based issues impact the accessibility, timeliness, diversity and availability of assistive technology?

- The NDIS expects the AT market to be agile enough to cope with new payment structures, processes and models of service delivery. The AT sector is considered a 'thin market' and the supply chain for diverse and complex AT requires proactive attention to develop the sector.
- The NDIS approval process is a significant barrier, and long standing relationships between AT suppliers, providers and participants have been relied upon to overcome the new barriers created by the NDIS. Consideration of the full suite of AT products required for participants, and how to ensure supply throughout Australia should be included in the NDIA's planning and the supports available to AT suppliers.
- Members reported difficulty accessing appropriate and registered providers and suppliers, especially to support participants with complex and customised AT needs and/or in more regional and remote settings.
- The NDIA requires the trial of equipment to ensure it meets the participant's needs. The pool of providers that supply and support complex equipment has not expanded under NDIS, and there appears to be a lack of staffing and stock available to facilitate trials. Companies may provide a funded trial but as this is not always embedded in the participant's plan it can lead to further delays waiting for funding approval from the NDIA. As demand for AT has grown the timeliness for trials, quotes and support have become longer.
- A lack of accreditation, training and professional development opportunities for service providers makes it difficult for NDIS participants to determine who can provide appropriate assistive technology services.

d) Please comment on the role of the NDIA in approving equipment requests

- ARATA members reported a number of concerns with the NDIA approving equipment requests including extended delays, poor communication and progress updates, AT reports and correspondence not thoroughly reviewed by NDIA, inadequate feedback provided in response to unsuccessful requests, and confusion with language and terms used by the NDIA.
- A better understanding of the NDIA's processes specific to the pathway for AT requests and how they differ for agency, plan and self-managed participants would assist participants and providers to better navigate AT supports under the NDIS. Guidelines on how to resolve and/or escalate urgent matters within the NDIA are required to avoid unnecessary delays and safety concerns for participants.
- The role of the specialised team working in the background to help planners with assessing high complex AT needs has been observed, but the NDIA needs to ensure planners are fully equipped to identify the role (or potential role) of AT when identifying participant goals.
- It can be inappropriate for a planner to include a specific assistive technology product in a participant's plan, particularly if the participant has not previously used the product. Further evaluation and support to consider/trial of a range of options that may address the

participant's goal is more likely to support them to experience a positive outcome through the use of assistive technology.

e) Please comment on the role of current state and territory programs in the assistive technology process

- ARATA Members reported that the state and territory programs are not involved in every state or territory, are not necessarily always consistent with the intent of the NDIS, and means that a national standard of AT delivery has not been achieved.
- The state and territory programs have provided a level of quality assurance not being delivered directly by the NDIA, although the interface between NDIA and these programs is not streamlined. There are some concerns that the NDIA participants that access AT through these programs are experiencing a less streamlined process than the NDIS intended, and that the a reduction in state funded supports during transition has also contributed to delays.
- The state programs also offer a central point of contact for the coordination of AT procurement, equipment pool management, re-issue of equipment, repairs and maintenance coordination not being managed directly by the NDIA.
- This level of support may not be required for every NDIS participant, but may be beneficial to participants that are agency managed and/or come under public guardianship and may not have the supports in place to navigate the AT sector effectively and efficiently.

f) Are the regulatory frameworks governing assistive technology fit-for-purpose?

- There is limited regulation of assistive technology services or service providers outside of regulatory frameworks that provide broad and largely non-specific guidance to the sector. ARATA members reported that the frameworks to ensure AT supports and services are fit-for purpose are not yet in place, and that this presents a significant opportunity for NDIA to support the sector to develop this.
- The NDIA must further define the criteria it uses to determine if requests are reasonable and necessary, and provide guidelines to assist participants and service providers. This would help to avoid the submission of unsuitable requests, subsequent delays and wasted funding.
- As well as the necessary framework (i.e. an Assistive Technology Accreditation System), and with consideration to the dispersion of traditional AT supports, there would be a value in the development of professional advisory roles that can provide supervision, support and guidance regarding AT service provision. There are examples of this within the compensable sector and in other countries such as New Zealand, within their Accident Compensation Corporation framework and Ministry of Health framework.

g) Other related matters

- There is an opportunity for the NDIA to define and streamline access to low cost and/or low complexity equipment (beds, shower chairs, walking aids etc.). Even so, the impact of personal and environmental factors can substantially influence the suitability and outcome of these devices and measures should be in place to safeguard against adverse consequences.

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- The NDIA needs to provide more guidance about how to navigate the new processes the NDIA has introduced. The information on the website is often overwhelming, difficult to locate and unrealistic to meaningfully engage with.
- The coordination of urgent requests, and response complaints must be better managed.
- Similar concerns exist with home modifications, leading to some providers not accepting home modifications referrals.
- NDIA staff and delegates require training in the role of service providers the delivery of AT supports, and how they link with participant goals.
- In many areas the current roll-out is creating a heavy demand for service providers, and it is evident that there are not enough providers to meet the need, or enough providers with the level of AT experience required by participants with complex needs. This issue is exacerbated as you move to regional and remote settings.
- The NDIA has not established a framework of supports (i.e. training, credentialing, mentoring and supervision) to develop the capacity of service providers in the AT sector.
- The NDIA AT templates would benefit from a review and should be developed in consultation with AT sector, and should include clear instructions and a streamlined pathway between the participant, service provider, and NDIA.
- A strategy for complex AT is required that acknowledges the increased time and resources required to facilitate trials, prescriptions and quotes. It is difficult to find multiple vendors to assist with complex AT, and it is unreasonable to request a comparative quote without a second supplier going through the same trial, prescription and quote process that requires more funding to facilitate.
- The flat rate to fund the provision of clinical services does not recognise clinician skills or provide any career progression.
- Concerns that recreational and sporting equipment is not being considered as intended by the NDIS guidelines, and participants and providers have experienced reluctance to process requests for such items despite aligning with the participant goals and lifestyle.

Thank you for the opportunity to contribute to this Inquiry. The National Disability Insurance Scheme presents a landmark opportunity to support the participation and inclusion of all Australians. Assistive technology encompasses both assistive products and services, and will be a key to realising the goals of a vast number of Scheme participants. ARATA is a national peak body and as such, is in a position to engage with the NDIA further to ensure the development of a robust and financially viable system for the provision of assistive technology.