

**VALID submission to the Social Services Legislation
Amendment Act (Transition Mobility Allowance to the National
Disability Insurance Scheme) Bill 2016 (Mobility Allowance Bill).**

DISABILITY, TRANSPORT & the NDIS

1. Background

VALID would like to thank the Senate Standing Committee on Community Affairs for the opportunity to make this submission in response to the Social Services Legislation Amendment Act (Transition Mobility Allowance to the National Disability Insurance Scheme) Bill 2016 (Mobility Allowance Bill).

VALID's submission to the Inquiry draws on the experience of carers and people with disability in the Barwon trial site who are part of three local groups – ***The Geelong Parent Network, Geelong Peer Action Group*** and ***Belonging in Geelong Peer Action Group (BIGPAG)***.

The Geelong Parent Network was established in 2003 to provide peer to peer support for people with disabilities and their families and to help inform VALID's systemic advocacy work.

VALID's has also established 2 Peer Action Groups in Geelong as part of the NDIS Disability Support Organisation Program. These 2 groups have brought people with disabilities and families/carers together to share information about the implementation of the NDIS in the Barwon Trial Site. They have been a critical source of information for VALID in relation to issues associated with the NDIS roll out and have drawn heavily from the lived experience of NDIS recipients.

VALID is Victoria's peak advocacy organisation for adults with intellectual disability who are in receipt of or eligible for State-funded disability services. It provides a state-wide individual advocacy service funded by the Office for Disability (DHHS). Through individual advocacy work, VALID has extensive experience in supporting people with intellectual disability to access community life and we are acutely aware of the range of barriers which prevent people from living independent lives in their local communities. These issues include access to affordable public transport.

More recently a Transport Issues Working Group, comprising representatives from the 3 groups has been convened in response to issues emerging from the transition of transport funding to the Mobility Allowance, administered through the NDIS. The Transport Issues Working Group has enabled VALID and the 3 local groups to partner with a range of local transport and disability support providers to consider the impact of the Mobility Allowance changes. Key stakeholders involved in these discussions include the Geelong Taxi Network and key disability service providers in the region - Karingal, St Laurence, MacKillop, Scope, Gateways & Encompass Support Services. Feedback from these consultations regarding the direct impact of some of these changes is outlined in our submission.

2. Impact of Changes in Administration of Mobility funding

"In the first lot of Plans in the Barwon region there was ample transport funding for everyone. In the second year of Plans transport funds were less but adequate. The focus was on community access with flexibility to meet different needs. In the third set of Plans, funding was capped at one of 3 levels but participants and families were not made aware of the changes and the impact this would have on their plans. The NDIA was now saying it was just making a 'contribution' to transport. The possible impact on the rest of a person's plan of running out of transport funds was not discussed, which seems odd when transport is so central to community access and participation'. John, Carer

"For those who rely on taxis as their primary means of transport the impact of the capping of funding on other goals in their plan, like community participation, is a very important consideration. The transport allocation needs to be matched to goals in a person's plan in order for the total funding package to work". Eric, Advocate

Without any consultation transport funding was capped to the Mobility Allowance which resulted in people running out of funding and then having to pay out of their own pocket to make up the difference. Sue, Carer

A decision taken by the NDIA to cap funding for transport for participants in the NDIS, after 2 years of providing higher funding levels based on assessments of 'reasonable and necessary' supports for transport, has been a source of major concern for NDIS participants and their families.

In a number of cases, participants in the NDIS ran out of their allocated transport budgets within 6 months, pressuring them to either reduce community participation that requires travel or to rely on families and other forms of private transport to meet the gap.

"There was no indication from NDIS of any changes to mobility funding.....as a result there was no way of readily knowing how the money was lasting. Some people who ran out of money just stopped attending their programs. I feel it is simply unacceptable that some clients were unable to attend their day programs through lack of funding especially when the portal wasn't even working for months'. Jane, Carer

The capacity for families and people to plan activities against budget allocations has been exacerbated by poor access to the NDIS portal which has made it difficult for participants to track their budgets and to have advance warning of their annual mobility allowance expenditure against the revised capped allocation.

While problems with the portal have also created some challenges for participants trying to track their funding balances, problems accessing transport budget balances in an accessible and timely manner make good planning difficult. A number of those the Transport Issues Working Group consulted, have indicated that if the current arrangements are to continue, they would like the transport budget linked to the

Victorian MYKI public transport ticketing system so that they can get an instant readout of balances as their card is used on each journey.

3. Reduced Capacity for More Flexible Use of Funding Packages

'The decision to reduce transport funding in NDIS packages to the level of the Mobility Allowance creates a mismatch between care support hours and transport funding, leading to participants not being able to achieve community participation outcomes due to limitations on affordable transport. The capacity to exercise choice and flexibility, to choose to take a support worker on a train or bus, or to take a taxi without a support worker, allows individuals to select options that are less costly and more efficient. Each journey presents different cost scenarios depending on public transport accessibility, scheduling, proximity to final destination and the nature of individual mobility support needs. Flexibility in this context is critical'. Peter, Community Development Coordinator

Previously in the trial site, people had access to the amount of transport support they required to enable them to meet their life goals and aspirations. This potential to use funding flexibly for transport was enhanced by the ability to negotiate movement of funding for carer and support hours to funding for transport, depending on need related to specific activities. It was felt by many people that the changes associated with the Mobility Allowance reduced flexibility and has prevented some participants from having a say in setting priorities between travel and care, thus limiting their 'choice and control'.

Issues around ride sharing and administration of payments where different costs are prescribed for shared rides and individual trips has also been identified as an issue. There was agreement across the groups that greater flexibility in relation to payments for shared and individual taxi trips could lead to improvements and savings in the allocation and use of transport funding.

The groups also reported that matching the transport allocation under the NDIS to the current mobility allowance will disadvantage people in isolated rural areas who have to travel much greater distances to access services but are in receipt of the same levels of funding as people living in regional centres.

4. Threats to Multi Purpose Taxi Program (MPTP) for Victorians with disability

In the course of the Transport Issues Working Group's meeting with stakeholders, it emerged that there had been discussions between the Victorian Government and the NDIA about transferring the MPTP program to the NDIA. The nature of this proposal and details of who it would apply to were not clear, but these rumours raised major concerns for Victorians with disability who rely on taxis as their primary form of transport. One of the key concerns was that those who were not deemed eligible for the MPTP could be impacted by having no access to subsidised taxi services. This would result in significant costs for people and provide a major disincentive to pursuing other access and participation goals in their plans.

Further to this, those who are deemed eligible for the Mobility Allowance, but who expend their annual NDIS transport funding allocation in under 12 months, may be required to pay full price for taxis. Evidence from Geelong suggests, that for some people, full payment for taxis would have been required for as much as 6 months as a result of the capped Mobility Allowance Funding levels

Given the restricted access to other forms of public transport this would result in significant disadvantage for this group of people.

Any changes to the MPTP, needs to ensure that accessibility and affordability of transport is maintained and that reduced funding in this area doesn't jeopardise a commitment to reasonable and necessary levels of travel, or restrict participation in all areas of community life.

5. Developing a Coordinated Approach to Transport and Increasing Mobility

The Transport Issues Working Group identified a number of additional issues and opportunities that we believe would benefit from a more coordinated approach to providing accessible transport that integrates planning across a range of government, business and community stakeholders.

5.1 Accessibility of Public Transport

"Lets face it, taxis are the transport of last resort for most people. If public transport was accessible and people could use it we wouldn't be so reliant on one form of transport – taxis." Jenny, Carer

The length of time it will take for all forms of public transport and associated infrastructure to become fully accessible for people with disabilities across Victoria means that taxis will continue to be a primary or the only form of accessible public transport for many people with disabilities.

The Transport Issues Working Group is committed to assisting with the development of some regional and local solutions to transport issues that take a coordinated and planned approach to meeting transport needs for people with disabilities which link a range of transport modes across the region.

A number of the larger service providers in the Geelong area have their own fleet of vans and mini buses that under current funding arrangements will be difficult to keep and maintain. Already discussions have identified potential for better use of all these vehicles within an integrated transport solution that could deliver some useful responses to the challenges of meeting community transport needs more broadly.

We are mindful of some of the excellent co-design work undertaken in Victoria between people with disabilities, families and DHS officers in the development of individualised funding arrangements. This work reflects a capacity for considerable goodwill and commitment to collaboration within the stakeholder group in Geelong to develop a better range of transport solutions for people with disabilities under the NDIS.

Victoria is also well placed to draw on the experience and learning's of community transport initiatives like the State Government funded Transport Connections Program which integrated a range of local community stakeholders in the planning and development of more inclusive and accessible community transport services. A more coordinated approach could see the Victorian State Government Health and Human Services and Transport departments, the NDIA, Local Government, local community and disability support organisations, taxi services and people with disabilities and their families, working together to develop new and innovative business models which are more responsive to community transport needs.

RECOMMENDATIONS

1. That consideration is given to the funding of a pilot initiative that develops an integrated disability transport strategy in the Barwon area that could inform transport funding and support arrangements for the full roll out of the NDIS. The project would be governed by an extended Transport Issues Working Group that involves VALID's Geelong based consumer groups, key disability support agencies in Geelong, the Geelong Taxi Network, representatives from the NDIA, Dept of Premier and Cabinet, DHHS, the Department of Transport and the 3 local councils in the region (City of Greater Geelong, Surf Coast shire and the Borough of Queenscliffe) . The Working Group has already commenced some analysis around these issues that we believe is critical to the development of effective solutions. It is critical that this work is done within a strong co-design framework that seeks to address immediate and long term transport needs of people with disabilities in the context of good economic management of available resources.
 2. That NDIS Plans allow for individuals to move funding between care budget and transport budgets to enable them to make most effective and efficient use of the total package. Such flexibility is more consistent with the intentions of the program to deliver more choice and control to participants.
 3. That the current MYKI system in Victoria is used to track funding balances and is extended to include taxi services.
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