

Submission accompanying meeting request with the Hon Bill Shorten, MP, Minister for the NDIS

The TAD Australia Federation (hereafter TAD Australia) proposes the following ideas to help Minister Shorten address issues that have arisen in implementing the National Disability Insurance Scheme (NDIS), so that, in his words, it can be a scheme that provides “modest support, smart and generous”.

1. Develop and apply the principles of a “Better Off Overall Test” (BOOT) to client-initiated plan reviews, plan assessments and plan variations so that only the request for variation is assessed without prejudicing existing entitlements.
2. Reduce the approvals bottleneck that leads to organisations incurring additional expense not immediately offset by revenue, with its consequential effect on the viability of not-for-profit providers.
3. Involve TAD Australia, as a federation of not-for-profit assistive technology providers in Australia, in a consultative partnership in the 10-year review of the scheme, as part of a co-design initiative.

1. Regain trust by applying BOOT principles

TAD Australia is anecdotally aware that some clients who need assistive technology (AT) are reluctant, even averse, to apply for plan reviews, plan assessments and plan variations for fear of gaining the AT but losing other existing provisions.

Applying the principles of a BOOT will:

1. Remove the source of distrust and eliminate a source of “midnight anxiety” (Shorten, 2022)
2. Reduce a source of expensive disputation.

This client reluctance manifests as them deciding against applying for a plan review, plan assessment and plan variation because of the “midnight anxiety” that they might lose something already funded, such as speech pathology sessions, respite care or travel options.

The TAD Australia member organisations recommend that the guiding principles of the BOOT (Better Off Overall Test) currently applied to enterprise bargaining **also** be applied to applications for NDIS funding, plan reviews, plan assessments and plan variations by people seeking AT.

Note that no scheduled or unscheduled plan reviews, plan assessments and plan variations for AT are submitted without a clinician (including allied health

professionals) having assessed the client and made a prescription for the necessary technology. Plan reviews, plan assessments and plan variations for AT therefore fulfil the NDIA requiring evidence of changed and therapeutically assessed need.

TAD Australia sees the principles of a BOOT applying whereby an application for AT will not trigger or generate an administrative review of the underlying level of existing NDIS support. People are enquiring about adding necessary AT to their programs, rather than removing existing supports.

Applying the BOOT will remove a critical source of disputation between the NDIS and the clients leading to expensive litigation.

The government has applied the BOOT principle in the industrial relations arena and TAD Australia asks that the principle be applied to the NDIS.

2. Eliminate bottlenecks to support cash flow and viability

As the Minister would know, there are significant bottlenecks around NDIS approvals.

The Minister would be aware that these bottlenecks negatively affect the ability of not-for-profit service providers to carry on business in this industry. There are real-life consequences when the normal approval flow is interrupted or slowed, and businesses operating with a client pipeline experience cash flow issues.

Solve-TAD, the largest of the TAD member organisations covering Victoria and New South Wales, has 298 bikes awaiting NDIS approval.

- The labour costs incurred so far around bicycle and tricycle assessments and applications are \$111,750.
- The value of the stock-in-hand of these bicycles and tricycles is \$350,000. This stock was pre-purchased to address supply chain issues.
- In addition to these costs, there are the normal overhead costs associated with the business.

The associated revenue for Victoria and New South Wales for these 298 bikes and trikes is \$750,000; Western Australia's for its bikes and trikes is \$185,000, Tasmania's is \$5,000, Queensland's is \$121,900, and South Australia's is \$51,770. Nationally, \$1,113,670 of revenue is currently waiting for NDIS approval because of the approvals bottleneck.

Solve-TAD (Victoria's and New South Wales's recently combined TADs) has been able temporarily to absorb the costs associated with these delays only because it has been able to draw upon accumulated reserves from past operations; however, this situation cannot continue for any extended period of time.

Solve-TAD emphasises that this delay to its expected revenue, given that it has already incurred substantial operating costs in anticipation of these approvals, is a direct threat to the ongoing viability of this organisation and its capacity to provide these services into the future.

Solve-TAD's situation is particularly dire, but all of TAD Australia's members are experiencing similar issues to varying degrees because of these bottlenecks.

3. Involve TAD Australia in the 10-year review

TAD Australia, as a federation of not-for-profit assistive technology providers in Australia, asks that it be involved in a consultative partnership as part of a co-design initiative in the 10-year review of the NDIS.

TAD Australia is the only national, truly independent NDIS provider group specialising in bespoke expert AT advice, design and delivery of custom solutions for people with disability. We are best placed to offer firsthand experience and advice regarding the successes and shortfalls of current NDIS AT processes.

Through a national workforce of technically skilled volunteers, TAD Australia designs and builds affordable and fit-for-purpose equipment solutions. Our national team of therapists has proven expertise in clinical assessment and prescription of AT solutions that enable optimal outcomes to build individual capacity. TAD Australia members are independent of commercial suppliers of AT, and deliver open-source equipment designs, meaning our advice and expertise is truly impartial. The participant is at the centre of all we do.

TAD Australia member organisations have been registered NDIS Providers since the rollout of the NDIS in 2013. We have been invited contributors to many submissions to government around AT. We were awarded the largest grant (\$4 million) through the ILC Economic and Community Participation 2019 round in recognition of our strong record of service delivery. The grant allowed TAD Australia's My Active Life three-year program to be implemented in 18 regional Australian locations. We are on track to meet our target during the three years of providing over 4,200 people living with disability the opportunity to participate in a recreational activity of their choice.

We also have ongoing delivery of bespoke AT to about 3,000 clients per year nationally.

Our pertinent and powerful insights into the needs of people with disability, and into the NDIS as it relates to this most necessary of services and products will benefit the 10-year review.