



## Submission in response to: **NDIS Review**

Link to submit response: <https://www.ndisreview.gov.au/have-your-say/have-your-say-online>

Date; 18/01/2023  
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## **About Assistive Technology Suppliers Australia (ATSA)**

ATSA is a national organisation representing assistive technology (AT) suppliers, including manufacturers, importers, distributors, retailers, tradespeople, allied health workers and technicians.

Our 160 members comprise businesses and not-for-profit organisations ranging 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 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.

## **Introduction**

Assistive Technology Suppliers Australia (ATSA) welcomes the opportunity to provide this contribution to the consultation on the Review of the NDIS.

## **Response to Review Questions**

Initial Comments: The deadline for this initial submission was not easy to find on the website & we would like to respectfully suggest an easily identifiable timeline for consultations be added to the site to assist participants, providers and others in making submissions.

### *1. What are your three main problems or concerns with the NDIS?*

- 1.1 It is disappointing that genuine intent by NDIA staff to resolve matters are often held back by complex “sign off” processes, which does impact on their ability to act quickly on sound process improvements.
- 1.2 Just as the NDIS has a culture of inclusion for consumers, ATSA believes this needs to be extended to the providers and suppliers of AT. This occurs in a limited way, with the application of key contacts for the larger suppliers, however it would be beneficial for this to be replicated for the smaller suppliers.

### *2. How do these three main problems affect you and/or others?*

In the first problem noted above in 1.1, we sight a recent training programme that was developed that will jointly assist the NDIA and the suppliers to be efficient on the process of claims, it was completed within just a few months after the request was made, however, it took longer than the development time to gain sign off for its release.

In the second problem noted above in 1.2, it is particularly critical for the provision of AT to participants living in regional and remote areas. Having a common point of contact would provide a level of consistency to work through any issues as they arise. The current situation means each time a participant, calls about a matter, the issue has to be re-explained and there are delays, and at times long delays in resolving problems.

### *3. What do you think are possible solutions to those problems?*

In the first problem, 1.1, providing staff in the NDIS with more autonomy in signing off training could be helpful.

In the second problem 1.2, a common point of contact for all AT suppliers would reduce delays and frustration for participants.

#### *4. What parts of the NDIS are working well for you?*

The annual review of the price list for the NDIS is a positive step as it allows for feedback from providers and changes to supply costs to keep in line with the market changes.

Annual pricing reviews allow for modifications to pricing in a set time frame, however ideally we would like to see earlier notification/consultation in the process before changes are made to the price list.

The impact brought on by COVID, i.e., the cost of delivery for Assistive Technology (AT) both from overseas and within Australia increased dramatically, in some cases over 300%. The NDIA worked proactively with the Assistive Technology (AT) market to manage the turbulent times to ensure the supply line was supported and the cost impacts were addressed.

The recent review of the code list for AT was also useful, i.e., changes to the Mid-Range AT regulations. This allowed suppliers of AT to ensure they were using the correct codes which is anticipated to reduce administration time in correcting code errors. This consultation was professionally managed. It is also noted that online training for the NDIA claim portal has now been provided to aid businesses supplying AT to NDIA participants.

There was a significant issue during 2021-22 for consumers and AT suppliers where orders for AT had been placed but open orders were not finalised in a timely manner. There were several contributing factors, but the primary one was the complex approval process for AT within the agency. This resulted in consumers not receiving the AT they needed and suppliers not realising orders despite a large investment of time and effort. This greatly impacted a number of SMEs viability which resulted in hard decisions, e.g., laying off of skilled staff. This was a traumatic time on top of the impact of COVID. After a number of representations by ATSA and suppliers on the issue over an extended period that included the supplying of data that demonstrated that AT quotes for certain categories had not been approved for months, there was a recognition of the issue and action was eventually was taken.

The introduction of a new process by the NDIS for mid-cost AT was extremely important in helping to resolve the open order issue (as stated above). It has significantly reduced the delays in the approval process for AT for consumers and hence the suppliers. This was an excellent initiative which has resulted in a new training program from the NDIS to support new and existing staff from suppliers understand the processes in place by the NDIS. The NDIS also responded to a request from ATSA for training when this significant change to midcost AT was implemented.

#### *5. Is there anything else you would like to tell the NDIS review?*

The NDIA, with several other government agencies are independently looking at the utilisation of second-hand products. This is to deal with shortages of AT, short term needs of items that have a long service life, plus consideration of waste management /environmental matters. Although second-hand purchases are already possible under the NDIS, there is a need for more formal safety frameworks to ensure that the integrity of the item meets the appropriate standards and TGA requirements. This is an important matter. ATSA is willing to

work with the NDIS to develop the appropriate framework for the AT to be reissued or recycled once the participant no longer requires that device/s.