

## **NDIS Assistive Technology (AT) Provision Position Statement - October 2023**

### **ATSA believes:**

- A framework which supports a competitive AT supply market will provide the best health, social and economic outcomes for both participants and for government.
- A preferred provider panel arrangement will result in the reduction the number of Assistive Technology (AT) suppliers across Australia, leading to less choice and control for participants in their AT supply.
- If a supplier is registered by the NDIS Quality and Safeguard Commission, it has been confirmed as a responsible and safe provider for NDIS participants therefore one supplier should not be labeled as “preferred” over another supplier by the NDIA.
- The supply of AT across Australia is significantly more complex than for continence products and cannot be restricted to a few preferred suppliers.
- Suppliers in local communities and national suppliers each have differing advantages for the clients they support. National suppliers can support clients across the country whereas local suppliers are able to provide immediate support to people living in the local community.
- Participants and planners need more support and information from the NDIA to understand the pricing process for AT which must be modified to suit an individual's needs.
- Practices such as price gouging are unethical and are outside ATSA's Code of Conduct.

### **ATSA calls for:**

- 1. A reform process which is transparent, inclusive and based on true co-design which:**
  - a. ensures people with disabilities receive the services and individualised assistive technology they require to pursue their personal goals, feel in control and be included in decisions about their lives.
  - b. safeguards a competitive market environment. For this reason, ATSA does not support the development of a preferred provider list and calls for the continuation of the current competitive market of register suppliers.
  - c. creates a culture of ethical practice by all providers.
  - d. has consideration of the possible use of parameters around a person's disability in what funds they may need so the individual has choice as to how they spend their funds within their own limit.

## 2. An impact analysis

- a. The NDIA must undertake a transparent cost-benefit analysis prior to the introduction of a preferred provider approach for AT suppliers or any other significant reform.

## 3. Transparency in pricing processes

- a. ATSA recommends a transparent process when setting any price caps or price ranges, including the use of current market prices,
- b. improvement in the price guide process, including a more extensive, definitive and public set of expected price ranges and guides,
- c. implementation of a price monitoring and reporting regime, either by the Agency, or an independent body.

## 4. Education and oversight on ethical business practices

- a. ATSA would welcome the increased involvement of the ACCC in the oversight of competition in the marketplace and anti-competitive behaviour,
- b. ATSA would value the opportunity to work with the NDIS Quality and Safeguards Commission and the Ministry to promote education on ethical business practices.

# Background

## 1. Preferred Provider

The NDIA Assistive Technology Markets and Innovation team advised a “preferred” provider approach may be introduced before the results of the NDIA Review have been announced. To be a preferred provider an AT supplier would be required to meet a set of criteria. ATSA is concerned that a significant change to the way the NDIA engages with and promotes suppliers (who have already undergone suitability criteria through registration) to participants is unnecessary, nor has been subject to any sector-wide consultation process.

In a recent survey of ATSA members **81% advised they would lose 10-80% of staff and revenue** under a preferred provider model where they were not included in the preferred provider list. Another **14% would have to close their businesses**. This will have a significant flow on effect to participants including long waiting times for AT, lack of local services and support (repairs and maintenance) and may also see the unintended provision of incorrect or fit for purpose AT.

## 2. Pricing

In the current pricing processes used by the NDIA, AT providers have no visibility of existing price caps or what they may cover (i.e., whether the item only or trials, delivery fee, fitting fee, adjustments etc is part of the price). While the NDIS has an internal price range for AT, AT providers do not know what that is and are therefore not ‘pricing to the cap.’ They are only informed if a cost they provide falls out of the price range.

Our members have advised they have advertised the base price for AT on their websites, however participants expected the final price to be equal to the base price despite advertising on supplier’s websites explaining modifications would cost extra. Additionally, planners have

included only the base price in participant plans - when the supplier added on the cost for necessary modifications, (seating, head rests, joysticks etc) those participants didn't have sufficient funds in their plan for the ordered AT.

### **3. Ethical business practices**

To be a member of ATSA suppliers agree to abide by the Code of Conduct which encompasses the Code of Practice, a Gift Policy, the Statement of Ethics, transparent practices on Commissions and Rebates and the Privacy Policy. Practices such as price gouging are unethical and ATSA will continue to work with the NDIA and Ministry to prevent and deal with these unethical practices. ATSA will also continue to educate our members on Business integrity and legal requirements in the Assistive Technology sector.

## **References**

<sup>1</sup> [About the NDIS Review | NDIS Review](#)

<sup>2</sup> Sourced from [Find a continence service provider | Continence Foundation of Australia](#)

<sup>3</sup> "Assistive technology is an umbrella term covering the systems and services related to the delivery of assistive products and services" - Reference: Key Facts - [Assistive technology \(who.int\)](#)

<sup>4</sup> [The role of pricing and payment approaches in improving participant outcomes and scheme sustainability | NDIS Review](#)