

**Vision Australia Submission: Consultation on Draft Lists of NDIS Supports**

Submitted to: Department of Social Services

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Submission approved by: Chris Edwards, Director Government Relations, Advocacy, NDIS and Aged Care

# Vision Australia submission: Consultation on draft Lists of NDIS Supports

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## Introduction

Vision Australia appreciates the opportunity to provide feedback to the Department of Social Services on the draft lists of NDIS supports, which will be introduced as a transitional arrangement following the passage of the NDIS Amendment (Getting the NDIS Back on Track) No. 1 Bill. We are broadly supportive of the majority of inclusions and exclusions proposed, and welcome the attempt to provide greater clarity as to how NDIS funds can be spent. There are, however, some sections of the draft supports list where additional transparency and precision of information could be offered. It will be important to ensure that certain supports are not inadvertently excluded and that intentions concerning appropriate use of funding are captured consistently across the various components of the document.

## Recommendations

Vision Australia recommends the following amendments to the draft NDIS Supports Lists:

* The definition of Vision Equipment should be expanded to include a reference to adapted daily living devices.
* Greater clarity is needed as to whether prosthetic eyes fall within the customised Prostheses support category inclusions. If the policy intent is that the NDIA should only fund prosthetics that would increase or maintain a participant’s functional capacity, this should be specified in the description. Alternatively, types of prosthetics not intended to be funded could be listed as a carve out.
* Further work is needed to provide guidance as to how the definitions of NDIS employment supports should be applied in practice, and to define the types of support that sit within the proposed framework.
* The definition of Interpreting and Translation services should be expanded to allow for visual interpretation services such as live audio description.
* The Disability-Related Health supports category should specifically include adaptive equipment designed to support people with disability in managing health conditions, such as talking blood glucose and blood pressure monitors.
* The Development of Daily Care and Life Skills support category should include an explanatory note to the effect that specialised travel and transport training for people who are blind or have low vision is a therapeutic support delivered by Orientation and Mobility Specialists or Dog Guide Mobility Instructors.
* Under Pet-Related Day-To-Day Living Costs, an exception should be provided clarifying that vet costs, grooming and boarding may be funded for approved NDIS assistance animals.
* An additional carve out should be included under Mainstream Mental Health, specifying that the NDIS may fund mental health supports that are not clinical in nature, particularly where those supports are focused on improving a person’s functional capacity, independence or social and economic participation. The inclusion of this carve out would be aligned to current NDIS Operational Guidelines concerning mental health services.
* A carve out should be provided in Clothing Related Day-To-Day Living Costs, stating that watches with Braille or tactile feedback that are specifically designed for people with disability may be purchased as a NDIS support.
* In Household Related Day-To-Day Living Costs, it would be helpful to include examples of types of appliances and relevant accessibility features which may be funded. It will be burdensome for service providers to manage expectations of participants if this is not clarified.
* Greater clarification is needed concerning the exclusion of aids and equipment used for educational purposes. It must be clear as to whether all assistive technologies that enable participation in education are excluded from NDIS funding, or only those which are utilised primarily in a school environment.

## Submission questions

### Do you think the draft list of NDIS Supports covers the kinds of disability supports you think should be included?

#### Vision Equipment

The proposed inclusions within the Vision Equipment support category are insufficient to capture the full range of assistive technology utilised by people who are blind or have low vision. This support category refers to “products for navigation, orientation, Braille, magnifiers and notetaking equipment”. We suggest that a reference to adapted daily living devices should be added to this definition. There are many aids that are designed specifically for people with vision impairment, enabling them to complete daily living activities independently. Examples include talking kitchen scales, thermometers and microwaves. Use of these products generally facilitates greater independence and decreases reliance on other formal supports. Currently, there is considerable confusion among NDIA staff, plan managers and participants as to whether these products are viewed as “standard household items”. The inclusion of a reference to adapted daily living devices within the definition of vision equipment would obviate the lack of clarity that currently exists and ensure that these disability specific products can continue to be purchased as NDIS supports.

#### Customised Prosthetics

This support category funds prescription and manufacture of customised prostheses requiring specialist skills. To date, there has been considerable conjecture as to whether the NDIA or the health system is responsible for funding of prosthetic eyes for people who are vision impaired. The argument often put forward by the NDIA is that these prostheses do not improve the participant’s functional capacity and should therefore be funded by State and Territory health systems and not by the Scheme. There is an opportunity in the drafting of these support lists to clarify this point of confusion. If the policy intent is that the NDIA should only fund prosthetics that would increase or maintain a participant’s functional capacity, this should be specified in the description. Alternatively, types of prosthetics not intended to be funded could be listed as a carve out.

#### Assistance to Access and Maintain Employment or Higher education

We suggest that the inclusions and exclusions listed in this support category have not clarified appropriate funding of employment supports in comparison to current NDIS arrangements. For example, support to retain and maintain employment can be funded, however, work-specific support related to work arrangements or the working environment is excluded. We recognise that modifications to a specific work environment are likely in many cases to be funded through other employment programs, however, further work is needed to provide guidance as to how the definitions of NDIS employment supports should be applied in practice, and to define the types of support that sit within the proposed framework. There would be benefit in including practical examples as part of the description for this support category. In its current form, participants, providers and planners are likely to experience difficulty in determining what can and cannot be funded.

#### Interpreting and Translation Services

This support category provides assistance to a participant to enable independent communication in essential personal, social or community activities where translation is not available from a mainstream service. We suggest this definition should be redrafted to read as follows:

Assistance to a participant to enable independent communication or participation in essential personal, social or community activities where translation or interpretation is not available from a mainstream service.

Vision Australia considers that drafting the definition in this way would enable crucial visual interpretation supports such as live audio description to be funded. This is often essential in ensuring that people who are blind or have low vision can participate effectively in social, community and civic events.

#### Disability-Related health Supports

This category includes supports that are a regular part of the participant’s daily life and result from the participant’s disability. It is not clear, however, as to whether this would encompass funding of adaptive equipment to support management of medical conditions. Many people who are blind or have low vision rely on devices such as talking blood glucose and blood pressure monitors to support them in managing associated health conditions independently. We suggest that assistive technology to support independent management of medical conditions should be listed as an inclusion under the Disability-Related health Supports Category, and also as a carve out under the Mainstream - Health section of the exclusions list.

#### Development of Daily care and Life Skills

This category includes supports that will enhance the ability of the participant to travel and use public transport independently. It is important to make a clear distinction between these supports, which are often delivered by disability support workers and involve journey planning and familiarisation, and the travel and transport training generally delivered to people who are blind or have low vision. The latter is delivered by an Orientation and Mobility Specialist or Dog Guide Mobility Instructor. It involves teaching of complex strategies to develop environmental awareness and safely navigate traffic and obstacles, often with a mobility aid such as a white cane or dog guide. Given the extensive training and knowledge required to deliver these supports effectively, they are provided under the therapeutic supports registration category. There have and continue to be numerous instances where NDIS planners have erroneously assumed that orientation and mobility services can be delivered by a disability support worker, with the result that the participant receives insufficient funding to access the supports they need. To alleviate this ongoing problem, we suggest that an explanatory note be added to the Daily Care and Life Skills support category, specifying that public transport and travel training for people who are blind or have low vision is a therapeutic support, to be delivered by Orientation and Mobility specialists or Dog Guide Mobility Instructors.

### Are there goods or services on the exclusion list that you think shouldn’t be there?

#### Pet-Related Daily Living Costs

The description of the Assistance Animals support category correctly identifies that maintenance costs including vet fees, transport costs and special diets are funded for NDIS approved assistance animals. The Pet Related daily living costs section of the exclusions list appears to contradict this, however. The current wording indicates that vet costs, pet grooming and pet boarding for all animals are excluded. We submit that an exception should be provided clarifying that vet costs, grooming and boarding may be funded for approved NDIS assistance animals. These services are essential for maintaining the health, welfare and working consistency of dog guides. We are in agreement that pet cremations, funerals and taxidermy should not be funded under any circumstances, as proposed in the current draft.

#### Mainstream Mental Health

People who are blind or have low vision often seek support from counsellors or psychologists with specialist knowledge of vision impairment. These supports can be invaluable to participants as they adjust to changes in their vision and the resultant impacts upon their level of functioning and independence. We suggest that an additional carve out should be included, specifying that the NDIS may fund mental health supports that are not clinical in nature, particularly where those supports are focused on improving a person’s functional capacity, independence or social and economic participation. The inclusion of this carve out would be aligned to current NDIS Operational Guidelines concerning mental health services.

#### Clothing Related Day-To-Day Living costs

This section of the exclusions list specifies that watches, including smart watches will not be funded. Vision Australia suggests that a carve out should be provided stating that watches with Braille or tactile feedback that are specifically designed for people with disability may be purchased as a NDIS support. Consideration should also be given as to whether this section of the exclusions list would unintentionally exclude fall detection and alarm devices that take the form of watches.

#### Household Related Day-To-Day Living Costs

Purchase of standard household appliances such as fridges and washing machines is excluded from the Scheme. Vision Australia agrees with this approach, however, we note that additional costs to upgrade standard household items to those with accessibility features are listed as supports that may be funded. There is likely to be some confusion as to how this would operate in practice. For instance, would the Scheme cover the cost difference where an appliance with accessibility features costs more than the basic model? What types of accessibility features might an appliance need to have in order to meet this funding threshold? It would be helpful to include examples of types of appliances and relevant accessibility features which may be funded. It will be burdensome for service providers to manage expectations of participants if this is not clarified.

#### Mainstream Education

Vision Australia is pleased to see that attempts have been made to elucidate the distinction between supports funded by the NDIS versus state and Territory education systems. We suggest that further clarification is needed concerning the exclusion of aids and equipment for educational purposes. It is not clear whether the policy intent of this wording is to exclude only those devices that are used in a school environment, or also those which may be used both in education settings and at home. The current wording could be interpreted as excluding any device which is ever used for educational purposes, even if it has multiple use cases. It must be made clear as to whether all assistive technologies that enable participation in education are excluded from NDIS funding, or only those which are utilised primarily in a school environment.

## Conclusion

Vision Australia thanks the Department of Social Services for its consideration of this submission. We acknowledge that the draft NDIS Supports Lists are transitional, and are largely intended to replicate current NDIS arrangements pending the passage of the NDIS Amendment Bill and the implementation of new intergovernmental agreements. We emphasise the importance of ongoing co-design involving the disability sector and look forward to further opportunities for collaboration and involvement as this process progresses.

# About Vision Australia

Vision Australia is the largest national provider of services to people who are blind, deafblind, or have low vision. We are formed through the merger of several of Australia’s most respected and experienced blindness and low vision agencies, celebrating our 150th year of operation in 2017.

Our vision is that people who are blind, deafblind, or have low vision will increasingly be able to choose to participate fully in every facet of community life. To help realise this goal, we provide high-quality services to the community of people who are blind, have low vision, are deafblind or have a print disability, and their families.

Vision Australia service delivery areas include:

* Allied Health and Therapy services, and registered provider of specialist supports for the NDIS and My Aged Care
* Aids and Equipment, and Assistive/Adaptive Technology training and support
* Seeing Eye Dogs
* National Library Services
* Early childhood and education services, and Felix Library for 0-7 year olds
* Employment services, including National Disability Employment Services
* Accessible information, and Alternate Format Production
* Vision Australia Radio network, and national partnership with Radio for the Print Handicapped
* Spectacles Program for the NSW Government
* Advocacy and Engagement, working collaboratively with Government, business and the community to eliminate the barriers our clients face in making life choices and fully exercising rights as Australian citizens.

Vision Australia has gained unrivalled knowledge and experience through constant interaction with clients and their families. We provide services to more than 26,000 people each year, and also through the direct involvement of people who are blind or have low vision at all levels of the Organisation. Vision Australia is therefore well placed to provide advice to governments, business and the community on the challenges faced by people who are blind or have low vision fully participating in community life.

We have a vibrant Client Reference Group, with people who are blind or have low vision representing the voice and needs of clients of the Organisation to the Board and Management. Vision Australia is also a significant employer of people who are blind or have low vision, with 15% of total staff having vision impairment.

We also operate Memorandums of Understanding with Australian Hearing, and the Aboriginal & Torres Strait Islander Community Health Service.