

Response to the Productivity Commission's Draft Report— Disability Care and Support

A National Disability Insurance Scheme

April 2011

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1 Introduction

Established in October 2000, Vision 2020 Australia is part of *VISION 2020: The Right to Sight*, a global initiative of the World Health Organisation and the International Agency for the Prevention of Blindness.

The vision of this global initiative is 'a world in which no one is needlessly blind or vision impaired and where those with unavoidable vision loss can achieve their full potential'.

Over 60 organisations are members of Vision 2020 Australia and are involved in; local and global eye care, health promotion, low vision support, vision rehabilitation, eye research, professional assistance and community support.

Members come together to collaborate, advocate and raise awareness of eye health and vision care in Australia and in our region.

2 Background

Many of Vision 2020 Australia's members work within the low vision and rehabilitation sector. They come together throughout the year as part of a low vision and rehabilitation working group to discuss key issues and areas for advocacy.

The group last met on 10 March 2011 to discuss the Draft Report¹ and heard from Ms Monika Binder from the Productivity Commission who presented the Draft Report and responded to questions.

At this meeting it was agreed that Vision 2020 Australia would prepare a submission, in consultation with members, focusing on addressing sector wide issues that are likely to have broad impact. It is intended that this submission complements individual member submissions and provides an opportunity for Vision 2020 Australia's members to be broadly represented.

As you are aware, many members have addressed the Productivity Commission through public hearings and through direct contact. It is pleasing that feedback from the Productivity Commission has suggested that the low vision and rehabilitation sector has been well represented and that the views of the sector have been largely consistent and complementary. There has also been some acknowledgement that blindness and low vision has not been comprehensively addressed within the Draft Report.

¹Disability Care and Support Draft Report (2011). The Productivity Commission:
<http://www.pc.gov.au/projects/inquiry/disability-support/draft>

3 Overview

Vision 2020 Australia commends the Productivity Commission for its efforts in undertaking this challenging reform activity.

The proposed National Disability Insurance Scheme (NDIS) may represent one of the most significant reforms to the disability sector ever undertaken. Theoretically, the concept of having an insurance scheme to cover all Australians, establishing secondary and tertiary tiers, together with meeting the support and need requirements of those who have a disability and their carers, is very appealing. Indeed the proposed increase in disability funding in the order of \$6 billion represents a formidable level of commitment.

As with any significant change to such a complex system, the full extent of its impact on those in society most in need is likely only to be found in the detail. Further, there may be latent effects that become evident only after a considerable period of time.

3.1 Draft Report focus

A clear focus of the Draft Report is on a sub-set of the disability sector, concentrating on individuals with profound cognitive and/or physical disability, their families and their carers. The Draft Report articulates at length how the proposed NDIS would meet the needs of these individuals and their immediate carers (including referencing a range of case studies).

While not denying the very real and urgent need for reform in this sub-sector, it is currently unclear as to the extent to which the blindness and low vision sector was referenced in the development of the scheme.

3.2 Low Vision and Rehabilitation sector

The lack of any specific reference to the complexity and detail needs of those who are blind or vision impaired and how their supports, resources and services are delivered represents cause for concern. If the unique, diverse and often episodic needs of the blind and low vision sector are not overtly represented and incorporated into the proposal there is a real risk of failing to resource and fund the delivery of supports required.

Specific reference to the range of circumstances and the diversity of supports and resources required by those who are blind or who have low vision would assist the sector to evaluate the relative merits of the scheme. It would also help to bring into being a disability care and support scheme that fully meets and exceeds the expectations of those for whom the proposed scheme is created.

Without this, the suitability and appropriateness of the proposed NDIS is difficult to determine.

3.3 Key areas of concern

3.3.1 Data and economic modelling

It is clear, despite the Disability Investment Group's (DIGs) call for an evidence base, that the economic costs of low vision and blindness have not been included in the additional \$6 billion of funding proposed for the scheme.

Appendix B of the DIG report *The Way Forward- A New Disability Policy Framework for Australia (2009)*² proposed Terms of Reference for the feasibility study to examine a new approach, highlighting among other things, the need for a detailed demand utilisation model and the conduct of needs/gap analyses. The report went on to also note the importance of data collection across a range of disability types and the need to ensure a strong evidence base to support scheme governance and to underwrite continuous improvement and efficiency gains. Importantly, it referenced the development of revenue projections using a range of economic and demographic forecasts.

It might be worthwhile for the Productivity Commission to consider the report *Clear Focus: The Economic Impact of Vision Loss in Australia (2009)*³. This report prepared by Access Economics offers a comprehensive assessment, providing detailed analysis of the costs of blindness and low vision. The findings in this report may offer invaluable information in providing costings for the overall scheme.

Further, the significant proportion of services, supports and resources funded and sourced through non-Government contributions is not represented. The plan to raise the additional \$6 billion from an increase in marginal income tax rates or a levy has the potential to impact on current levels of fundraising achieved by organisations within the blind and low vision sector. Discretionary giving, donating, bequeathing and possibly even volunteering, may be adversely impacted. Public interest in supporting organisations via direct giving may decrease if the perception is that the tax-payer funded NDIS is covering the complete cost of disability care and support. Further, there may even be implications for the tax deductibility status for certain organisations.

As such, there is a risk of adopting a new funding model that does not reference adequately true costings for the full range of supports required and consequently would lead to an underestimate of need and significant unmet demand.

A more thorough and complete reference to the blind and low vision sector is needed, highlighting the actual costs and a clearer view of the way in which needs are met, by whom, for whom and at what frequency.

The approach to costing disability support services and the ultimate funding model adopted within the NDIS may well lead to unintended consequences regarding the way in which many organisations operate in the blind and low vision sector.

²The Way Forward – A New Disability Policy Framework for Australia (2009). Disability Investment Group
http://www.fahcsia.gov.au/sa/disability/pubs/policy/way_forward/Documents/default.htm

³Clear Focus: The Economic Impact of Vision Loss in Australia (2009). Access Economics.

3.3.2 Eligibility criteria

Of particular interest are eligibility criteria for inclusion in either Tier 2 or Tier 3 of the new scheme. Specifically, the prospect of most of those in the blind and low vision sector, now in receipt of low vision services for no or low cost, qualifying for Tier 2 presents a serious concern. It raises the possibility that under the new scheme some people may need to fund these supports themselves. Further, phasing out block funding might also reduce the access to these services for those in Tier 2. That is to say, if areas of service provision are reduced or eliminated, the referral role for NDIS may not be tenable.

3.3.3 Assessment

The prospect of context-free assessments of need, determined through the use of generic tools by generalist assessors is concerning. There has been a strong call for low vision and blindness services to be considered specialist services and for disability specific elements to form part of any assessment and be carried out by appropriately qualified staff. This acknowledgement of some unique elements of the blind and low vision sector is further supported by the extent to which timely professional interventions are a feature of effective referral pathways delivering positive and lasting outcomes for those with a disability.

The desire for suitably qualified staff with appropriate blind and low vision knowledge and skills also forms part of a broader challenge regarding the disability workforce and the increases required to meet the demands of the proposed NDIS. There is already considerable unmet demand for certain blind and low vision services and the development of the necessary skilled workforce represents an area of risk for the scheme.

3.3.4 Age cut-off

One of the most problematic elements of the proposed scheme relates to the arbitrary age cut-off for inclusion in the NDIS. There is great concern regarding this and the risk of inequity, but also its relation to the current pension age.

There appears to be insufficient cross-referencing between this Inquiry's Draft Report and the Productivity Commission's draft report *Caring for Older Australians (2011)*⁴. While those in the blind and low vision community over the age of 65 currently have access to the full range of available supports (at no or low cost), the cut-off age proposed in the NDIS would see these individuals moved into the aged care system which makes virtually no provision for dealing with older Australians with disabilities.

These elements of the proposal have the potential to impact adversely on a large number of people and it is hoped further consideration might reduce or eliminate the current risks.

Integrating the findings of the two reports and resolving some of the inconsistencies would be an important contribution to the development and implementation of a fair and equitable system to meet the needs of the community who are both ageing and have a disability.

⁴Caring For Older Australians Draft Report (2011). The Productivity Commission:

<http://www.pc.gov.au/projects/inquiry/aged-care/draft>

4 Conclusion

Vision 2020 Australia commends the Productivity Commission for its efforts in developing the Draft Report.

While reform is highly needed and long overdue in some areas of the disability sector, it is unclear how the scheme will address the demand and support needs of people who are blind or have low vision.

Vision 2020 Australia has developed this submission in consultation with many member organisations across the blind and low vision sector to address sector wide issues that have broad impact. Feedback from these organisations has been integrated to deliver this response to the Productivity Commission Draft Report.

In summary, a number of key themes were identified across the sector with some consistency.

These include:

- the extent to which the NDIS explicitly references the blind and low vision environment
- the articulation of the clear case for impactful change to the entire disability support system
- the extent to which the full cost of blind and low vision disability supports has been captured
- implications of the new funding model as it relates to organisations and continuity of service
- eligibility criteria for inclusion in Tiers and the Early Intervention category
- specificity of assessment processes and acknowledgement of professional intervention
- age cut-off and cross referencing to the report *Caring For Older Australians*
- workforce numbers and appropriate qualifications and domain knowledge.

Excluding key elements, as they relate to the blindness and low vision sector, in the fundamental building blocks of the scheme is concerning and needs to be addressed. Vision 2020 Australia would be pleased to assist the Productivity Commission in the next stage of its work by bringing its member organisations together to provide further information and a forum for addressing the issues highlighted in this submission.

Ultimately, a system is needed that will provide better outcomes for those who have disabilities, their families and carers.

5 Contact

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