



## Response to RFI

### 1.1 Respondent's Information

1.1.1 Respondents are to provide the following information:

Ref No	Requested Information	Response
a.	Full name of the respondent	<p>This is a joint response from the following organisations:</p> <ul style="list-style-type: none"> <li>• AGOSCI</li> <li>• Assistive Technology Suppliers Australia Ltd (ATSA)</li> <li>• Australian Association of Gerontology Ltd.</li> <li>• The Australian Orthotic Prosthetic Association</li> <li>• Australian Physiotherapy Association</li> <li>• Australian Rehabilitation &amp; Assistive Technology Association (ARATA)</li> <li>• Allied Health Professions Australia (AHPA)</li> <li>• Indigo Australasia Incorporated</li> <li>• LifeTec</li> <li>• Occupational Therapy Australia (OTA)</li> <li>• Speech Pathology Australia</li> </ul> <p>The contact person for this response is David Sinclair, ATSA</p>
b.	Any trading or business name	As above
c.	If an Australian company, its ACN (Australian Company Number) / ARBN and ABN as applicable	This is being submitted as a joint response on behalf of the above organisations.
d.	The registered office, principal place of business and an outline of the company structure	This is being submitted as a joint response on behalf of the above organisations.



Ref No	Requested Information	Response
e.	The date and place of incorporation	This is being submitted as a joint response on behalf of the above organisations.
f.	For a foreign firm or company, details of its registration, incorporation and place of business in Australia and the name of any Australian representative and its ABN (Australian Business Number) / ARBN (Australian Registered Body Number) (if any)	N/A
g.	Particulars of any foreign national, foreign bodies etc. in a position to exercise or influence control over the respondent	N/A
h.	Details of the respondent's background, experience and resources relevant to its ability to meet the requirement.	This is being submitted as a joint response on behalf of the above organisations.



**27 July 2021**

## **Response to the NDIA SPC1263**

### **Request for Information (RFI)**

## **Designing an Early Childhood Assistive Technology (AT) Approach**

### **Q 7.8**

#### **Joint Statement of peaks bodies in response to RFI**

The National Assistive Technology Alliance (NATA) is a voluntary, member-based community of practice collaborating to influence policy, practice and resource allocation<sup>1</sup>. NATA aims to ensure a positive future for all AT stakeholders by working collaboratively to influence policy and industry standards and practice for the AT sector.

The following NATA members endorse the response provided:

- AGOSCI
- Assistive Technology Suppliers Australia Ltd (ATSA)
- Australian Association of Gerontology Ltd.
- The Australian Orthotic Prosthetic Association
- Australian Physiotherapy Association
- Australian Rehabilitation & Assistive Technology Association (ARATA)
- Allied Health Professions Australia (AHPA)
- Indigo Australasia Incorporated
- LifeTec
- Occupational Therapy Australia (OTA)
- Speech Pathology Australia

In summary, we support that participants of the NDIS should have choice and control in the selection of Assistive Technology (AT).

The opportunity for participants to choose cannot however preclude access to the most suitable product/s, AT expert advice and associated AT services that will provide the best AT solution for an NDIS participant's needs and will enable them to achieve their life goals and objectives.

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<sup>1</sup> See <https://www.arata.org.au/access-&-funding/towards-a-national-assistive-technology-alliance/>



The final Early Childhood AT approach adopted by the NDIA must therefore hold central the features of good AT practice<sup>2</sup>, as this will assist to mitigate the risk of AT issues arising<sup>3</sup>. These good practice principles require further articulation in the current NDIS draft Early Childhood AT approach.

We encourage the NDIA to ensure that the final Early Childhood AT approach draws on the evidenced recommendations of the 2018 Senate Inquiry into Assistive Technology – specifically, “The Senate committee strenuously suggests that the NDIA does not re-invent the wheel yet again by attempting to design a model with all the features of the models in place before the Scheme rolled out, but with much worse outcomes for all stakeholders, including taxpayers”<sup>4</sup>.

### Response to features of the current RFI

We support timely supply of AT and early intervention of supports.

We support the supply and utilisation of AT that is second-hand or recycled (refurbished) if a financially viable model can be established, with appropriate oversight for necessary AT advice, quality, sanitation, suitability for reissued use, and safeguarding.

Timely, effective and evidence-informed AT advisory services will be required as the level of complexity of new or reissued AT increases<sup>5</sup>. In addition, timely, consistent, transparent and clearly-justified funding decisions provided by the NDIA will also be required – if one of these areas breaks down, participant outcomes will be negatively impacted, and existing markets will also be impacted.

We support a supply framework that ensures safeguards on the quality of AT products and services for AT end users.

We support a regulatory framework that addresses the inherent risks of a second-hand or recycled (refurbished) supply of AT. This is to include addressing safety and liability risk of the users, the prescribers of AT, and the suppliers.

We support a framework that delivers an environmentally sustainable delivery of a second-hand or recycled (refurbished) AT.

We support a viable second-hand or recycled (refurbished) AT industry, that does not preclude the NDIS participant from access to new products including the most suitable and technology advanced AT for Australians.

We do not support supply chain models of AT that introduces risk to the user of AT or promotes or encourages profiteering that damages the integrity or intent of the NDIS scheme<sup>2</sup>.

<sup>2</sup> ARATA (2016). Statement on Good Practice in assistive technology service provision in Australia. Accessed via [https://www.arata.org.au/public/33/files/Presentations%20%26%20resources/AATC2016\\_StatementOnGoodPractice.pdf](https://www.arata.org.au/public/33/files/Presentations%20%26%20resources/AATC2016_StatementOnGoodPractice.pdf)

<sup>3</sup> ARATA (2016). Issue statement regarding assistive technology provision in Australia. Accessed via [https://www.arata.org.au/public/33/files/Presentations%20%26%20resources/AATC2016\\_IssuesStatement.pdf](https://www.arata.org.au/public/33/files/Presentations%20%26%20resources/AATC2016_IssuesStatement.pdf)

<sup>4</sup> Commonwealth of Australia (2018). Executive summary of the final report of the Joint Standing Committee inquiry into Assistive Technology. Canberra, Australia: Author.

<sup>5</sup> NDIS (2017). Assistive Technology (AT) complexity level classification. Geelong, Australia: Author.



We support further work by the NDIA to inform the development of a second-hand or recycled (refurbished) AT market. As a starting point, the signatories encourage the NDIA to ensure that the final Early Childhood AT approach draws on the evidenced recommendations of the 2018 Senate Inquiry into Assistive Technology in this area, which encouraged exploration of previous/existing state-based models and engagement of expertise and program learnings from these State-wide aids and equipment programs to build NDIS efficiencies.

Additional work in relation to the second-hand or recycled (refurbished) AT market would also include an evaluation of quality and safety controls of AT products sold in existing second-hand markets.

We support a collaborative process between the NDIA and the general AT sector, supported by the services of a suitable qualified actuary, to model the various commercial realities of an open AT market second-hand or recycled (refurbished) to identify the framework that enables a sustainable industry. To address all industry needs, the investigations should also identify what incentives can be built into the framework to ensure there are sufficient allied health professionals registered with the NDIS willing to work in the AT space. Additionally, the work should identify any challenges in expanding a new framework to other age groups.

We support the introduction of an educational and accreditation system that ensures the standards and integrity of AT devices are maintained, that supports the compliance with the regulators including the TGA and ACCC.

The final Early Childhood AT approach adopted by the NDIA must hold central the features of good AT practice<sup>1</sup> as this will assist to mitigate the risk of AT issues arising<sup>2</sup>.

To understand the complex AT issues at hand, NATA suggests that the Agency needs to design a response that represents all features of the AT ecosystem 5Ps<sup>6</sup>: people (AT users who are children aged 0-7 and their families), products (assistive products), provision (service delivery), personnel (workforce), and NDIS policy.

The current draft approach does not adequately represent all children who are NDIS participants (e.g. Table 1) or the assistive product bundles (it is currently heavily weighted to seating and mobility and self-care products – more work is required by the Agency to ensure this approach is representative of the broad scope of AT needs of early childhood Scheme participants).

Collaborative work with the sector will be required to expand this Approach to represent the complex intersection of the 5Ps, to ensure an effective AT ecosystem is available for a child and family when significant and permanent disability exists.

In closing, we recommend that the final NDIS Early Child AT approach adopted requires both a **greater timeframe** and a **broader sector consultation** than the work undertaken by the Agency to date.

We believe that the NDIA's request for information regarding the draft Early Childhood AT approach has not been adequate to date, for four key reasons:

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<sup>6</sup> World Health Organisation (2020). *Policy brief: Access to assistive technology*. Geneva: World Health Organisation. Accessed via <https://www.who.int/publications/i/item/978-92-4-000504-4>



1. The timeframe for response to, and restricted nature of, the AusTenders RFI
2. The level of consultation with families of children who are AT users – the RFI has limited detail but does note a consultation with ‘over 30 families nationally’ (page 8 of RFI), which is 0.2% of the 13,652 Early Childhood NDIS participants having AT (page 23 of RFI) and thus not adequately representative of the early childhood group
3. The inadequacy of consultation (including the current RFI) with AT suppliers and advisors who are a necessary part of the AT ecosystem – the RFI has limited detail, but NATA notes that some NATA members have attended 1-2 NDIA-run roundtable events focusing on targeted areas of the broader Early Childhood AT approach proposed
4. A roadmap to address the systemic AT issues which exist internally within the NDIA and have been documented by the Joint Standing Committee inquiry into assistive technology<sup>3</sup> – these are noted throughout the RFI (e.g. see diagram on page 8) but without strategic work on these internal Agency issues, any new approach has a high risk of failure.

The signatories stand ready to contribute to a broader consultation by the NDIA for the benefit of NDIS participants, their families and the Scheme as a whole – this is particularly important given that the NDIA notes in the RFI that the proposed Early Childhood AT approach may be expanded to older age cohorts as the market develops and/or as the Agency determines.

All correspondence regarding this Joint Statement can be directed to

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