

Commissioner Robert Fitzgerald AM
National Disability Agreement Review
Productivity Commission
Locked Bag 2, Collins St East
Melbourne Vic 8003

Dear Commissioner Fitzgerald

Re: Productivity Commission's Issues Paper: National Disability Agreement Review

The Australian College of Nursing (ACN) welcomes the opportunity to provide a submission on the *Productivity Commission's Issues Paper: National Disability Agreement Review (July 2018)*. ACN's response will focus on the aged care sector and its position on the National Disability Insurance Scheme (NDIS), as a priority area of reform for the Productivity Commission. Specifically, ACN wishes to highlight its concerns that the needs of older Australians (65 years and older) with disabilities will not be met by the aged care system and these individuals will face further disadvantage by being excluded from the NDIS on the basis of age.

In the current National Disability Agreement (NDA), specialist disability services provided by the NDIS are freely available to people with disabilities aged < 65 years, whilst older Australians are deemed ineligible regardless of similar disabilities and needs.¹ ACN is concerned that using age as a basis for assigning funding to either disability or aged care services is inequitable and creates barriers to accessing services that best meets an individual's needs. These barriers may be even more isolating for individuals from culturally and linguistically diverse (CALD) backgrounds. ACN is particularly concerned for older Australians who may acquire a disability after the age of 65 years or who may have restricted functional and physical capacity, which may limit their ability to perform basic activities of daily living. These older individuals will need to engage age care services despite having similar needs to younger people with disabilities and who are therefore deemed eligible for NDIS. It is expected that health outcomes will differ due to the variability in care provided and access to necessary services and equipment, primarily quality of life and avoidable hospitalisation.

Within the aged care sector, a key area of action identified for older Australians is the need for affordable assistive technologies, aids and equipment (AT).² Whilst AT promote independence, autonomy and safety for consumers, AT provision in Australia is currently inequitable and inefficient due to differences in funding schemes and responsibilities across the ageing and disability sectors.³ Under the NDIS AT strategy, responsibility of disability related AT for NDIS clients aged < 65 years

¹ National Aged Care Alliance (2016). 'Improving the interface between the aged care and disability sectors – Discussion Paper'.

² National Aged Care Alliance (2015). 'Enhancing the quality of life of older people through better support and care'.

³ National Aged Care Alliance (2018). 'Position Paper: Assistive Technology for Older Australians'.

will remain with NDIS, while responsibility for health, ageing or disability related needs requiring aids and equipment for those aged 65 years and over will remain with the states and territories through aged care services.⁴

Similarly as mentioned above, ACN is concerned that older individuals, who acquire a disability after 65 years, will not be eligible for NDIS and therefore not have the same access to AT provision as NDIS clients resulting in different health outcomes.

Additional issues include:⁵ 1) older people without an existing compensation scheme who suffer a catastrophic injury are not adequately supported financially by the National Injury Insurance Scheme (NIIS) when compared to younger people who can access the NDIS if they suffer a catastrophic injury; and 2) individuals with younger onset dementia may not have their needs met exclusively within the disability sector and would benefit from flexible access to services in the aged care sector (e.g. residential aged care services) without fear of losing access to the NDIS.

As a member of the National Aged Care Alliance (NACA), the representative body of peak national organisations in aged care, ACN supports the following recommendations outlined by NACA concerning aged care and disability services⁶:

- “Australians with disability must have equitable access to care and support regardless of their age, the funding source, programs or systems”.
- “Older people with disability should have access to the same specialist disability services available to younger people through the NDIS, including support from the Information, Linkages and Capacity Building (ILC) stream of the NDIS and the episodic, intensive supports required by people with disability, including psychosocial disability”.
- “The disability and aged care systems should be flexible, streamlined and aligned to ensure that older people with disability, people with younger onset dementia or people with disability whose needs change as they age receive the services they need from the most appropriate system, regardless of who is responsible for funding or delivering them”.

⁴ See section 3 of Schedule C to Bilateral Agreements for Transitioning to the NDIS. Available at <https://www.coag.gov.au/node/525> (Commonwealth and NSW); <https://www.coag.gov.au/node/526> (Commonwealth and Victoria); <http://www.coag.gov.au/node/532> (Commonwealth and Queensland); <https://www.coag.gov.au/node/530> (Commonwealth and South Australia); <https://www.coag.gov.au/node/531> (Commonwealth and Tasmania)

⁵ National Aged Care Alliance (2016). ‘Improving the interface between the aged care and disability sectors – Discussion Paper’.

⁶ National Aged Care Alliance (2016). ‘Improving the interface between the aged care and disability sectors – Discussion Paper’.

- “Service gaps and perverse incentives within both systems need to be addressed, especially the current inequitable access to aids and equipment and assistive technology”.
- “People who face additional barriers, such as people from linguistic or culturally diverse backgrounds, must receive additional support to ensure equitable access and outcomes”.

In summation, ACN believes that regardless of age, people with disability must be provided with equitable, efficient, cost-effective support and access to assistive technologies across the disability (NDIS) and aged care sectors. To ensure this is achieved, ACN recommends that prior to completion of the NDIS rollout, inconsistencies between the disability and aged care sectors are identified and addressed.

ACN is the pre-eminent and national leader of the nursing profession. We are committed to our intent of advancing nurse leadership to enhance health care and strongly believe that all nurses, regardless of their job title or level of seniority, are leaders.

Please contact ACN’s Policy and Advocacy Manager, Carolyn Stapleton,
if you would like to discuss any of ACN’s response.

Yours sincerely,

Adjunct Professor Kylie Ward

Chief Executive Officer

RN, MMgt, Dip App Sci (Nursing), Acute Care Cert, FACN, Wharton Fellow, MAICD

24 August 2018