

Productivity Commission Review

Into National Disability Insurance Scheme (NDIS) Costs

Transport-specific Submission



The Productivity Commission is undertaking a review of NDIS Costs to inform the final design of the scheme. In responding to this review, LINK Community Transport has restricted the scope of its response to transport matters only.

About us:

- LINK Community Transport is Victoria's largest independent NFP provider of community mobility with 21 years' experience as a trusted provider of transport services and advocacy for frail aged people and people with a disability in the Northern and Western Metropolitan Melbourne Regions

Submission:

It is LINK's submission that

- NDIS should be designed and resourced to meet the reasonable needs and aspirations of people with a disability to ensure equitable access to social and economic inclusion
- 'Needs and aspirations' require a vastly enhanced level of clarification and should be unambiguous, transparent, largely predictable and appropriately communicated
- 'Needs and aspirations' ought to be funded based on proper actuarial analysis of transport type, mode and cost most suited to the individual concerned and their circumstances
- Markets will respond with necessary innovation and safeguards where fair compensation for services is on offer

Underpinning this is the need for

- Clear delineation between State and Federal obligations to ensure appropriate systems and mechanisms
- Immediate priority afforded to establishing proper transport costs and allocations framework within NDIA

Critical Observations:

Supporting this submission are the following critical observations

- 'Transport' seems to have been misunderstood and underestimated within System design
 - Current allocation levels depict largely universal, arbitrary and overly simplified 'contributions' to transport costs, with no empirical basis pertaining to individual circumstance or need
 - A cost/entitlement framework drawing upon individual capability, circumstances and endorsed 'need' has not been developed despite sound development prospects
 - Proximity to mobility allowance is most unfortunate and inconsistent with pillars of change embodied in NDIS initiative
 - Other factors such as attendant travel require appropriate consideration; attendants occupy seats and the cost requires recovery
- Transport funding varies according to purpose, eg. vocational versus recreational; whereas endorsed need and circumstance should drive allocations
 - Whilst it is accepted that vocational pursuits should be encouraged; endorsed plans are formed based on individual considerations – once the plan is established, transport allocations should reflect appropriate cost of mode and circumstance

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- Evidence that school bus travel for special schools the subject of differing treatment – the reasons are accepted but nonetheless induce just another example of wildly fluctuating transport outcomes
- Evidence that outcomes vary too greatly against participant knowledge and advocacy, and planning vagaries
- **Communications failures have been evident in terms of the flexibility to utilize “Core Supports” funding for transport**
 - Low proportion of clients have demonstrated a proper understanding of this
 - Plans do not adequately demonstrate the basis of calculation of each core support component to facilitate informed trade-off and comfort within client decision making
 - ‘Core Supports’ should be definitively calculated and funded, thereby negating the need for people to ‘trade-off’ an already ‘reasonable and necessary’ allocation
- **Perceived/Real effects on vulnerable people**
 - Customers perceive that they have transferred from receiving the mobility allowance and having access to subsidized transport via HACC funded services to now receiving a mobility allowance-equivalent but now having to pay unsubsidized fares – as a result many are withdrawing from our service (despite our being cheaper than taxis) based on affordability. Evidence suggests some are not engaging in the community at levels previously enjoyed based on expired transport funds and perceived fear of running out of money for other supports
 - Issue further exacerbated by support providers divesting of fleet given prohibitive cost, and exposing clients to full effect of market forces with disadvantaged effect relative to previous circumstances
- **Effects of continuing inadequate transport funds allocation**
 - Complex needs and/or people of challenging behaviours will encounter the same accessibility issues as individuals requiring wheelchair accessible taxis (market failure)
 - Eradication of valuable human and social capital developed in standing arrangements
 - Added pressure and loss of utility to carers/family members
 - Market imbalance, loss of quality, prevalent failures

We welcome any follow-up enquiry and/or request.

Contact:

Chief Executive Officer – Rick Lawford

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