



*Bringing People Together
To develop responses to the community's needs
for transport, access and mobility*

Submission for

**Consistent, Fair and Equitable
Transport Funding
for NDIS Participants' Plans in
Queensland**

February 2018

Transport is THE enabler of core supports for NDIS participants' goals

Transport is THE enabler of core supports for NDIS participants' goals



Bringing People Together
To develop responses to the community's
needs for transport, access and mobility

Submission for Consistent, Fair and Equitable Transport Funding for NDIS Participants' Plans in Queensland

Executive Summary

This TDSA¹ submission firstly identifies key issues of inconsistency, unfairness and inequity in current NDIS² funding of reasonable and necessary supports enabling transport components of NDIS participants' plans and the critical negative effect on participants and overall success of NDIS. Then a policy framework for ensuring consistent, fair and equitable transport funding in NDIS participants' plans in Queensland is proposed to enable not only participants' goals and plans to be achieved but also NDIS's statutory obligations.

We acknowledge the contribution of the real-world experiences, frustrations, fears and challenges of many people with disabilities, their carers and families, representative groups, disability service provider organisations and other agencies that underpin the proposed consistent, fair and equitable transport funding policy and framework. The overriding issue is that NDIS participants are not appropriately informed of their rights to be funded for reasonable and necessary supports that includes being funded for the transport enabling component of their reasonable and necessary supports in their NDIS plans. This denies and restricts participants' access to the community, work, education, medical appointments etc., curtails their independence, increases their social isolation and significantly impacts on their quality of life. This also defeats the statutory objective of the NDIS to "*support the independence and social and economic participation of people with disability*"³.

At a policy level this submission proposes that the enabling role of transport be included in participants' NDIS plans and goals for full and effective participation and inclusion in society be immediately and specifically mandated in all NDIA operating guidelines, on-line and other communications, staff training, participants' plan meetings, and participants' funded plans.

¹ Transport Development and Solutions Alliance Inc. - *Bringing people together to develop responses to the community's needs for transport, access and mobility*

² National Disability Insurance Scheme (NDIS)

³ *National Disability Insurance Scheme Act 2013* (Cth) – section 3(1)(c)

Transport is THE enabler of core supports for NDIS participants' goals

Background

It has been internationally and nationally acknowledged for many years that people with a disability have a legal right to support to achieve the same level of independence and social and economic participation as all other Australians, particularly to access the community, work, education and medical appointments.

An excellent history of the Commonwealth and State Governments' funding of support programs is set out in the Commonwealth Parliament's e-brief "Disability Support and Services in Australia"⁴, relevant extracts are:

"... The Commonwealth first became directly involved with providing support for people with disabilities via the introduction of the Invalid Pension in 1908. ... During the 1940s the number of people with disabilities increased rapidly essentially due to injuries suffered during the Second World War. In response to this, the Commonwealth established the Commonwealth Rehabilitation Service (CRS) and at the same time there was an expansion of the number of sheltered workshops and accommodation services run by volunteer organisations. Through the 1960s and 1970s the Commonwealth increasingly provided funding to help these organisations provide accommodation, employment and other support services.

... The most important of these initiatives/trends were: • a general move away from institutional type services towards a more community orientated type of service provision • the Disability Services Act 1986 which provided for a comprehensive framework for the funding and provision of support services for people with disabilities

... [Significantly] 1991 Disability Reform Package which reformed Commonwealth income support payments for people with disabilities with a view to encouraging their integration into the workforce to the maximum extent possible [and] the 1991 Commonwealth-State Disability Agreement (CSDA) which aimed to clarify the roles and responsibilities of the respective governments. In essence, the Commonwealth was given responsibility for employment services and the States and Territories were given responsibility for accommodation and other support services. A major aim of the CSDA was to reduce the amount of duplication and administrative complexity that existed in the funding and service arrangements for disabled people...."

Consequently, Queensland Government's long-standing responsibility for "accommodation and other support services" was clarified and specifically included funding for transport. For example, relevant to this submission, the Queensland Government introduced the Taxi Subsidy Scheme (TSS) in 1987 to "provide an affordable and accessible transport option for people with a disability who experience profound difficulties using other modes of

⁴ "Disability Support and Services in Australia" McIntosh G and Phillips J. (2001) e-Brief, Social Policy Group, Parliament of Australia – available on-line at http://www.aph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/Publications_Archive/archive/disability

Transport is THE enabler of core supports for NDIS participants' goals

*public passenger transport*⁵. A 2013 review of TSS found that transport funding for people with a disability has “... *critical links to the broader benefits of social inclusion and better economic outcomes ..*”⁶.

The National Disability Insurance Scheme on Transport⁷

The genesis of the NDIS is the 2011 Productivity Commission Research Report “*Disability Care and Support*”⁸ established by the Australian Government “... *to consider how a national disability scheme could be designed, administered, financed and implemented. The Commission was asked to examine the feasibility, costs and benefits of replacing the current system of disability services with a new national disability care and support scheme that: ...provides for a range of coordinated support options — accommodation, aids and appliances, transport, respite, day programs and community participation ...*”⁹.

In due course, the Commission reported that “*Current disability support arrangements are inequitable, underfunded, fragmented, and inefficient and give people with a disability little choice.*”¹⁰. To redress these disadvantages and inequities by establishing a national disability insurance scheme, the Report proposed in broad terms that “*The scheme would cover the current full range of disability supports [bullet-points] ... Transport assistance to provide or coordinate individual or group transport services, including taxi subsidies...*”¹¹.

The Commission further reported that “... *Access to transport is often a necessity for employment, social participation and access to other services such as health and education. ... Access to transport is often poor for people with a disability, and many participants have noted the difficulty this causes regarding access to other services ..*”¹².

Following consideration of the Commission’s report, Commonwealth and State Governments reached agreement on a national disability insurance scheme resulting in the *National Disability Insurance Scheme Act 2013* (Cth) commencing generally on the 28 March 2013. The statutory Objects of the Act included “.. *(c) support the independence and social and economic participation of people with disability; and (d) provide reasonable and necessary supports for participants in the National Disability Insurance Scheme*

⁵ “*Disability Support and Services in Australia*” McIntosh G and Phillips J. (2001) e-Brief, Social Policy Group, Parliament of Australia – available on-line at http://www.aph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/Publications_Archive/archive/disability

⁶ Ibid para 4.5 Other Recommendations

⁷ Specific legal aspects of the NDIS Act on the matter of transport are currently before the Australian courts and are not addressed as part of this Submission.

⁸ “*Disability Care and Support*” Australian Government Productivity Commission Inquiry Report No. 54 31 July 2011

⁹ Ibid Vol. 1 p.94

¹⁰ Ibid Vol. 1 p.6

¹¹ Ibid Vol. 1 pp. 22-23

¹² Ibid. Vol 1 p. 250

Transport is THE enabler of core supports for NDIS participants' goals

launch ...”¹³.

NDIA's Operational Guideline – 10. Planning states that “*All Australian Governments have made a commitment through the Intergovernmental Agreement for the NDIS that people receiving supports before becoming participants of the NDIS should:*

- *not be disadvantaged by the transition to the NDIS; and*
- *be able to achieve at least the same outcomes (i.e. achieve at least the same level of social or economic participation or maintain the ability to undertake the same range of activities) in the NDIS as compared to those expected to be achieved by their previously provided support.*

This commitment made by Government is referred to as the principle of 'no disadvantage'. The NDIA is not a party to the Intergovernmental Agreement and the principle of no disadvantage is not a specific obligation imposed on the NDIA under the NDIS Act. Notwithstanding, when performing its functions the NDIA must use its best endeavors to act in accordance with any relevant intergovernmental agreements (section 118(2)(a))”¹⁴.

The NDIS Act enshrined specific general principles to guide actions under the Act which includes “...*(11) Reasonable and necessary supports for people with disability should: (a) support people with disability to pursue their goals and maximise their independence; and (b) support people with disability to live independently and to be included in the community as fully participating citizens; and (c) develop and support the capacity of people with disability to undertake activities that enable them to participate in the community and in employment...*”¹⁵.

Pursuant to ss. 33 and 34 of the NDIS Act, statutory Rules¹⁶ have been made about assessment and determination of the reasonable and necessary supports that will be funded for participants under the NDIS. Under those Rules, “*NDIS will be responsible for: (a) supports for a person that enable independent travel, including through personal transport-related aids and equipment, or training to use public transport; and (b) modifications to a private vehicle (ie not modifications to public transport or taxis); and (c) the reasonable and necessary costs of taxis or other private transport options for those not able to travel independently.*”¹⁷.

As referenced previously, NDIA has issued from time to time Operating Guidelines for NDIA staff, NDIA

¹³ NDIS Act sec. 1(c) and (d)

¹⁴ NDIA Operational Guideline 10. Planning – para 10.9.1 The Principle of “No Disadvantage” downloaded from <https://www.ndis.gov.au/operational-guideline/planning/deciding-supports-plan.html>

¹⁵ NDIS Act sec. 4(11).

¹⁶ *National Disability Insurance Scheme (Supports for Participants) Rules 2013* effective from 1 July 2013

¹⁷ *Ibid* Schedule 1 Rule 7.21 Transport

Transport is THE enabler of core supports for NDIS participants' goals

participants, service providers and the public generally. These NDIA Operating Guidelines include one titled “Including Specific Types of Supports in Plans” which includes one on Transport¹⁸ intended “... to be used in conjunction with the Operational Guideline on Planning and provides additional guidance in relation to the preparation and review of a participant’s plan when specific types of supports are under consideration. In particular, this Operational Guideline provides additional guidance in relation to making a decision to approve a statement of participant supports which includes one or more of these specific types of supports”. NDIA has also issued “Principles to Determine the Responsibilities of the NDIS and Other Service Systems” that outlines its applied principles for Transport and “indicative role of the NDIS and other parties – Transport” approved by the Council of Australian Governments (COAG)¹⁹.

NDIS Price Guides are issued periodically to set out the prices for supports in the various States and Territories and independent review²⁰ of pricing. A significant paramount consideration in the setting of NDIS prices for supports is the financial sustainability of the scheme²¹ with less regard for the viability and sustainability of the service providers. National Disability Service Ltd. (NDS) reports “Disability service providers report their key concerns are: low NDIS prices; the costs of change; and uncertainty about their financial sustainability”²². Whilst acknowledging and supporting this critical concern, the aspect of NDIS pricing and its impact on service providers is not the subject of this Submission.

The 2017-18 Price Guide valid from 1 July 2017 embodies funding for transport in two aspects:

1. Transport Allowance (replaces Mobility Allowance) Support Category 1.02. This aspect is not the subject of this Submission; and
2. CORE – “A support that enables a participant to complete activities of daily living and enables them to work towards their goals and meet their objectives. Participant budgets are flexible across the four sub-categories: Assistance with daily living, except where a budget is allocated to Supported Independent Living (SIL), which is always Agency managed; Transport; Consumables; and Assistance with Social and Community Participation. A participant may choose how to spend their core support funding, but cannot reallocate core support funding to other support purposes (i.e. capital or capacity building supports)”²³.

¹⁸ *Operating Guideline – Transport* – downloaded 21 Sep 2017 at <https://www.ndis.gov.au/Operational-Guideline/including-12.html>

¹⁹ NDIA “Principles to Determine the Responsibilities of the NDIS and Other Service Systems” 27 November 2015 p.20 downloaded from <https://www.coag.gov.au/sites/default/files/communique/NDIS-Principles-to-Determine-Responsibilities-NDIS-and-Other-Service.pdf>

²⁰ See for example NDIS Independent pricing review by McKinsey and Company current underway (2017-18)

²¹ See for example Productivity Commission Issues Paper “National Disability Insurance Scheme (NDIS) Costs” Feb. 2017 p.25

²² NDS “State of the Disability Sector Report 2017” Underlying concerns and issues p.15

²³ 2017-18 NDIS Price Guide Vic/NSW/Qld/Tas valid from 1 July 2017 p.10 – TDSA underlining for emphasis

Transport is THE enabler of core supports for NDIS participants' goals

Australian Government's current position on NDIS transport

In response to a draft of this Submission the Australian Government's Assistant Minister for Social Services and Disability Services advised TDSA on 17 January 2018:

"... The Australian Government recognises that transport assistance can be an important component of NDIS supports and acknowledges the need to provide consistency and certainty to NDIS participants.

Guided by the Council Of Australian Governments' Principles to Determine the Responsibilities of the NDIS and Other Service Systems (the COAG Principles), all Governments expect that NDIS participants who cannot use public transport without substantial difficulty due to their disability will receive reasonable and necessary transport support through their NDIS plans.

State and Territory Governments retain an obligation to provide transport support for people with disability. State Governments are responsible for ensuring that transport options are accessible to people with disability. This includes offering public transport concessions to people with disability and complying with relevant non-discrimination legislation including the Disability Standards for Accessible Public Transport (2002).

The inclusion of transport in NDIS participant plans is proving to be a complex issue. The NDIA is currently considering this matter including the need for a transparent and robust pricing framework for transport support.

All NDIS participants can seek a review of transport supports in their plans at any time. If a review finds that a participant's transport supports are inadequate, their NDIS plan will be adjusted according to what is considered to be reasonable and necessary. ..."

SUBMISSION: Urgency to address inconsistencies, unfairness and inequities in funding transport as enabler of core supports in NDIS plans

Real-world examples: the NDIS objectives are not being fulfilled

It is widely accepted that transport is THE critical enabler of core supports for participants to achieve their goals and support the independence and social and economic participation of people with disability²⁴. Without adequate transport the Participant cannot truly participate socially and economically the same as all other Australians!

The Australian Parliament's *Joint Standing Committee on the NDIS* has previously²⁵ taken in evidence of real-life examples of NDIS participants' experiences with NDIS many of these examples are illustrative of the inconsistency, unfairness and inequity of transport funding in core supports funded within NDIS plans resulting in denial, restriction or impossibility of NDIS participants' access to and participation in social and economic opportunities. Similarly, the Committee took submissions from many peak bodies, agencies, representatives, and disability support organisations

²⁴ See for example evidence from public hearing witnesses to Australian Parliament's *Joint Standing Committee on the NDIS*, Hansard transcript Monday 7 March 2016

²⁵ Public hearing witnesses to Australian Parliament's *Joint Standing Committee on the NDIS*, Hansard transcript Monday 7 March 2016; evidence of Belcher, David. Development Officer, Community Disability Alliance Hunter (CDAH) pages 6-7.

Transport is THE enabler of core supports for NDIS participants' goals

– notably and relevantly for this Submission, the evidence from one witness that “ ... CDAH, the local user-led disability support organisation, heard of the pain that people with disability were experiencing around transport with the NDIS. We also know that transport is an issue that will make or break this scheme...”²⁶

In addition, the Committee received evidence that “... David Bowen [the then NDIA CEO], who attended the forum. He addressed the forum and said that it was intended for plans to be used flexibly; that we can interchange our flexible supports to include transport. David also said that the intention was to give people plans that included a reasonable amount of funding for people to use as flexibly as they could: They're in your hands. How you make decisions about how you use the funding is up to you. ...”²⁷.

Individual, community and media reports from many people with a disability (and their families and carers) significantly make reference to the following key transport issues for them:

- participants are unable to fully utilise their plans due to lack of funding for the reasonable and necessary transport component of the various core support elements of their plans
- families are now forced to self-fund this transport component for NDIS participants to undertake the goals, activities and reasonable and necessary core supports to achieve their plans – unlike in the past where the transport component of necessary disability supports was an integral part of overall funding
- people with disabilities becoming increasingly isolated due to lack of funding for the transport component of necessary

In addition, individual, community and media reports from many disability support organisations, representative groups and other agencies make reference to key transport issues for them:

- NDIS participants are losing out on choice and control of their goals and plans.
- Inconsistent application of the Act, statutory Rules, and national policy determination that transport component included in core supports can be used flexibly by the participant
- Disparity both across Queensland generally and within a NDIA region specifically over time in how ‘transport’ is interpreted and ‘handled’ within the participant planning meeting and subsequently when implementing the agreed plan.

Across Australia there is a considerable body of evidence²⁸ that NDIS participants’ have little knowledge of their statutory right that the transport component can be considered and quantified with the NDIS funding of enabling core

²⁶ Public hearing witnesses to Australian Parliament’s *Joint Standing Committee on the NDIS*, Hansard transcript Monday 7 March 2016; evidence of Belcher, David. Development Officer, Community Disability Alliance Hunter (CDAH) page 7.

²⁷ Ibid page 7

²⁸ See for example “Position Paper: National Disability Insurance Scheme” Australian Community Transport Association p. 2 – “Relatively few participants, providers and planners are aware that transport options are available within the NDIS through the Core Support functions.”

Transport is THE enabler of core supports for NDIS participants' goals

supports²⁹. Additionally, NDIA planners are making the decision (consciously or unconsciously) that if the NDIS participant does not specifically “ask” (or ask the “right” way, or respond to a NDIA planner’s question the “wrong way”) for transport costs to be included as a component of the calculation of funded core supports then NDIA planners accept no responsibility to inform, educate or guide the NDIS participant on their rights for it to be considered and included for core supports funding. The submission by Carers Australia to the Australian Government’s Productivity Commission 2017 inquiry into NDIS costs submitted:

“... we note in particular the many complaints in relation to transport since the Scheme was first implemented. In some instances it was not made clear to participants and their carers that the transport services currently received would not be automatically ongoing and that their transport needs would have to be included in their plans...”³⁰

Consequently, any “concession” by NDIA that core supports can be used flexibly to include transport is fundamentally flawed from the outset as, in effect, the core supports have not been fully costed to include the transport costs to enable core supports and NDIS participants have to fund transport by reducing critical core services in other areas³¹. The NDS submission to the Australian Government’s Productivity Commission 2017 inquiry into NDIS costs submitted that

“... The already emerging transport problems will be compounded by the fact that a growing number of service providers are considering divesting of their transport fleets. If this occurs, participants will be severely disadvantaged (or the expenditure on transport will substantially increase, with participants trading off their participation supports for transport)...”

Lack of funding for transport as enabler being acknowledged and quantified for core supports has been wide spread over all regions. People in remote Queensland are being hard hit with some participants in remote areas not being able to access medical appointments, day programs, employment or community access due to lack of funding or confusing messages on their legal rights to transport costs of enabling core supports.

For the specific purposes of this Submission, in August 2017 TDSA commissioned a short on-line open-question qualitative questionnaire (open only for a period of four weeks) to provide an opportunity for input of TDSA members, NDIS participants and their families and carers, and disability service providers. The questions posed were:

1. Are you a NDIS participant or service provider?
2. What transport related issue(s) have you experienced with NDIS plans?
3. How has it changed from previous transport funding?
4. What would you like to see changed?
5. Do you have any other comments or concerns about transport in NDIS?

²⁹ 2017-18 NDIS Price Guide Vic/NSW/Qld/Tas valid from 1 July 2017 p.10

³⁰ Carers Australia Submission to the Productivity Commission Inquiry on National Disability Insurance Scheme (NDIS) Cost March 2017

³¹ See also comment by Ken Baker AM, Chief Executive, National Disability Services in “NDIS: Transport services may go without improved funding, service provider body says”, ABC News On-line 20/9/17 – “... while clients can supplement transport needs with other parts of their funding packages, it will leave less money for other essential services.” downloaded from <http://www.abc.net.au/news/2017-09-20/ndis-transport-at-risk/8964918>

Transport is THE enabler of core supports for NDIS participants' goals

Five NDIS participants and 12 disability support organisations participated in the short time period and their responses are shown in the Attachment. As well as providing “from the heart” personal experiences and frustrations with NDIS plans generally and transport in particular, the results confirm widespread lack of reliable and factual information and full understanding of the legal right of NDIS participants to have reasonable and necessary transport considered, quantified and funded within and as the enabler of core supports.

Specifically relevant to this Submission, extracted illustrative comments from the questionnaire responses are:

- *Transport has been duck shoved around right from the beginning, there is no point having aspirational plans and goals if you can't have the transport to get you to and from. Transport enables ...*
- *Transport is vital for people with disabilities because they generally can't transport themselves and generally can't afford mainstream transport costs*
- *Participant doesn't have transport as part of her plan and could not attend a medical appointment ...*
- *Clients tell me they don't have enough funding for transport through NDIS, this means staying home and not going out. This is wrong.*
- *You can't participate socially and economically if you can't get to places.*
- *Transport to be recognized as a legitimate funding item when developing participants' plans.*
- *No guidelines for pricing for transport.*
- *Unclear how to use core support budget funds for transport.*
- *... there is so much confusion with no one person really knowing the answers, not only is it different state to state it seems to be different region to region and then planner to planner. This was supposed to improve people's lives.*
- *More practical information and guidelines.*

All the above real-world experiences, frustrations, fears and challenges of many people with disabilities, their carers and families, representative groups, disability service provider organisations and other agencies evidence unequivocally that NDIS participants entering into the scheme are not appropriately informed of and funded for transport enabling component of their reasonable and necessary supports in their NDIS plans. This denies and restricts participants' access to the community, work, education, medical appointments etc., curtails their independence, increases their social isolation and significantly impacts on their quality of life. This also frustrates the statutory objective of the NDIS to “*support the independence and social and economic participation of people with disability*”³².

In short, the NDIS promise enshrined in the legislation is not being fulfilled!

³² *National Disability Insurance Scheme Act 2013 (Cth) – section 3(1)(c)*

Transport is THE enabler of core supports for NDIS participants' goals

Deficiencies in NDIA Plan Preparation Processes

Since the NDIS has started to roll out in Queensland the problem of confusion due to the extreme variability in NDIA³³ planner's knowledge of the NDIS legislation, rules, and NDIA policies and operating guidelines in order to make consistent fair and equitable decisions on transport as enabler of core supports in NDIS participants' plans. Some NDIA planners are well-versed and experienced but many NDIA planners fall well short of being consistent, fair and equitable in their decisions. The most notable of these inconsistencies, unfairness and inequities is that NDIS participants are not provided with any/sufficient information on their legal rights to transport costs of enabling core supports.

Example of the pervasiveness of this inconsistency and confusion can be demonstrated by the following examples drawn from service providers' experiences as follows:

“A disparity that our Account Management staff are finding is that when it comes to a participant wanting to utilise their core support for some transport. The planner says yes it can occur, however, the Finance area of NDIA are saying no. This creates confusion, frustration and angst with participants, as there are two areas in NDIA that are conflicting the information. This is occurring in the Townsville NDIA Office.”

“... we had a [review] by the NDIS and they advised verbally that we should not be using these line items as they were only setup as a temporary measure while they were transitioning their system (this was a few months ago now). I have requested this in writing but we have not received anything to date. This only effects client who are claiming under core supports, if they are claiming under transport this is not an issue. Until such time as they provide written advice to this effect or remove the line items from their system, we are continuing to claim using these line items; ... Below is a screenshot clearly demonstrating that there are line items in the portal. These are not included in any Price Guides or information given to NDIA planners.

Support Budget	Support Item Number	Support Item Name
Social Community and Civic Participation	04_050_0108_1_1	Temp specialised transport to school/educational facility/employment/community
Social Community and Civic Participation	04_051_0108_1_1	Temp- Transport
Social Community and Civic Participation	04_052_0108_1_1	Temp- Trans support for payt of transport allowance when govt subsidy remd

These confusions, inconsistencies and misinformation on transport funding within core supports in NDIA participants' plans are causing people with a disability and their families and carers great concern and is the topic in much social

³³ National Disability Insurance Agency (NDIA)

Transport is THE enabler of core supports for NDIS participants' goals

media commentary on the NDIS.

SUBMISSION: Immediate Changes Necessary for Consistent, Fair and Equitable Transport Funding in Core Supports for NDIS Participants' Plans in Queensland

Our submission clearly evidences that NDIS participants and their families and carers are not being appropriately informed of and funded for transport enabling component of their reasonable and necessary supports in their NDIS plans. This pervasive confusion is due largely to the extreme variability in NDIA³⁴ planners' knowledge of the NDIS legislation, rules, and NDIA policies and operating guidelines in order to make consistent fair and equitable decisions on transport as enabler of core supports in NDIS participants' plans – and the guidelines as to quantification of transport enabling costs in core supports. This denies and restricts participants' access to the community, work, education, medical appointments etc., curtails their independence, increases their social isolation and significantly impacts on their quality of life. This also defeats the statutory objective of the NDIS to “*support the independence and social and economic participation of people with disability*”³⁵.

To immediately remedy this, our Submission is that the quantification of transport costs as part of enabling core supports MUST be included in participants' NDIS plans³⁶. This will require NDIA to immediately and specifically mandate this specific inclusion in all NDIA operating guidelines, on-line and other communications, NDIA staff training, participants' plan meetings, and participants' funded plans³⁷.

Thank you.

Transport Development and Solutions Alliance Inc.

³⁴ National Disability Insurance Agency

³⁵ *National Disability Insurance Scheme Act 2013* (Cth) – section 3(1)(c)

³⁶ See also “Position Paper: National Disability Insurance Scheme” Australian Community Transport Association p. 5

³⁷ See also “Position Paper: National Disability Insurance Scheme” Australian Community Transport Association p. 6

Transport is THE enabler of core supports for NDIS participants' goals

ATTACHMENT.

RESPONSES TO ON-LINE TDSA QUESTIONNAIRE – August 2017

For the specific purposes of this Submission, in August 2017 TDSA commissioned a short on-line open-question qualitative questionnaire (open only for a period of four weeks) to provide an opportunity for input of TDSA members, NDIS participants and their families and carers, and disability service providers. Responses below are complete and unedited.

Question 1: Are you a NDIS participant or service provider?

Responses: 5 participants 12 providers

Question 2: What transport related issue(s) have you experienced with NDIS plans?

Number of respondents: 17

Unclear how to use core support budget funds for transport.

Limited disability transport services available in regional / remote Queensland

Limited transport (during support time) for participants who are located out of town

The carers keeping the transport funding for themselves. This is great as they require it for all that they do but leaves the provider out of pocket when the client wishes to travel around achieving their goals. (this is really an issue when accessing 1:1 support)

Transport has been under funded in almost 100% of cases. Clients have become distressed at losing both their mobility allowance AND QCC or other subsidy funding they have had and are unable to understand how transport can be paid from core supports as well as Transport funding.

Being able to charge for transport through the CSV file

Who pays for the first 10 klms of each trip? Payment in arrears

I have had to charge a higher rate for a trip.

Not enough money

Participant doesn't have transport as part of her plan and could not attend a medical appointment in Brisbane.

The onus falls back on a service provider to arrange and support transport needs if a plan does not have adequate funding

I have never received any help with my transport with my plan.

That the first 10kms is not claimable. However, in Brisbane this could be 30 mins of a therapist's time. Who pays for this time. Secondly, there is a limit of \$3000 per year. This means that families without a car, those

Transport is THE enabler of core supports for NDIS participants' goals

who just don't have capacity to travel or those in rural areas are disadvantaged.

Too many to nominate here but there is so much confusion with no one person really knowing the answers, not only is it different state to state it seems to be different region to region and then planner to planner.

This was supposed to improve people's lives.

No public transport. I need a scooter.

The transport allowance is insufficient. I had to try and trial assistive technology but most providers are hours away. We could not get many to come here so had to go with limited options. All specialists etc. are hours away so getting required reports is a costly business. I was asked to send my card back but now they are available again.

Question 3: How has it changed from previous transport funding?

Number of respondents: 16

Centrelink paid it to my personal account so it felt more easy to use now I'm not sure how it works paying it to people.

N/A – NDIS is the first funding support I've received.

Participants have previously had more flexibility under block funded support programs.

Previously the hourly rates for Group care consumed the.

No guidelines for pricing for transport. No allowance for rural areas where public transport is not an option.

Clients have lost up to \$2,700 in mobility allowance and up to \$2,500 in other travel subsidies with only the level 1 transport funding reallocated. Core service providers have advised families that they cannot use core services to pay another provider for transport services and are convincing those families to take up transport with them due to not being 'allowed' to use core supports elsewhere.

Monthly invoice was sent to clients for mobility charges.

Previously paid in advance.

Much more complicated.

Taxi are unfairly looked after.

Previous transport funding would have allowed the participant to attend her medical appointment.

We did not have transport funding previously and absorbed the losses in funded programs but this will no longer be possible as the shift from community care to NDIS will require each individual to be able to pay for transport.

Yes, I'm having not receive a support with this problem.

I do not understand the process of getting transport in your plan for all you need the transport allowance L1,2,3 is pitiful. Go back to block funding.

Transport is THE enabler of core supports for NDIS participants' goals

I was previously able to drive.

Funding for alternatives has stopped when NDIS came in

Question 4: What would you like to see changed

Number of respondents: 15

Being able to pay support people to use their care is essential if I am to get to the social and academic things I do, need to have lots of flexibility to sue core funds to do this.

Clearing up of what transport costs providers can and cannot charge, and from which 'line item' we should be paying these fees.

A higher allowance for transport for participants, particularly those who live in outer suburbs of regional towns.

Additional funding per KLM for travelling with 1:1 funded clients.

More practical information and guidelines.

All transport funding to be allocated clearly to TRANSPORT. This funding level to be equal to what they were previously accessing for subsidised transport costs.

More clarification on how we can claim for transport through the CSV file.

Transport separated in NDIS plan, not in Core Supports.

More transport money.

Transport to be recognized as a legitimate funding item when developing participants' plans.

Equity in transport funding to participants consideration that rural participants with no transport networks will not have enough funding to participate in their community or meet basic needs if inadequate funding is offered.

No cap on funding. All travel time can be claimed.

Level playing field for everyone, it seems like depending on which state your in that planners are pushing people toward Taxis. When community transport disappears where will the competition come from then???

Taxis don't care nor do they show and provide any empathy, this is just dollar signs for them. How is the spending the taxpayer's money frugally??? Costs or taxis are ridiculous.

Funding for scooters easily available

An adequate budget for costs relating to transport for those in rural and regional areas.

Question 5: Do you have any other comments or concerns about transport in NDIS?

Number of respondents: 13

You can't participate socially and economically if you can't get to places.

Transport is THE enabler of core supports for NDIS participants' goals

I realise I will never be able to drive with help for care adaption as my family cannot afford to purchase a car that meets the NDIS criteria.

Glad there is a transport component but perhaps need to be more flexible.

Already receiving complains that travel time is taken out of support time and clients is not getting as much help as the once were.

Core providers including day services and accommodating support providers are gouging the Coe supports funding for the maximum possible amount for transport because they are able to report on it as core support function, charging p to \$56 per hour as support time when they are in fact providing transport for relatively short distances that could cost as little as \$15 if charge at a per KM rate.

We are realizing now that we are not charging NDIS for transport correctly for some of our clients.

Costs for vehicle/bus modifications for wheelchair accessibility?

Clients tell me they don't have enough funding for transport through NDIS, this means staying home and not going out. This is wrong.

Have all the people at ndis saying the same answers make core money available to transport.

Transport is vital for people with disabilities because they generally can't transport themselves and generally can't afford mainstream transport costs.

Service providers will find it difficult to meet clients' needs in rural areas without transport support as the NDIS support funding is generally inadequate.

Transport has been duck shoved around right from the beginning, there is no point having aspirational plans and goals if you can't have the transport to get you to and from. Transport ENABLES, wake up you dills.