



The Royal
Society for
the Blind ®

14 January 2014

Mr Maurice Newman
Commissioner of Audit
The Treasury
Langton Crescent
PARKES ACT 2600
AUSTRALIA

Dear Maurice

Re: **Disability and Aged Care Reforms**

My name is [REDACTED] and I am the Executive Director of the Royal Society for the Blind (RSB), an organisation founded in 1884 to provide services for people who are blind or vision impaired.

I have worked at the RSB for over 20 years and never in that time have I had more concerns over the ability of people who are blind or vision impaired to receive equitable access to specialist rehabilitation services than now appears to be the case. Further I am unaware of any policy initiative that has been as ill conceived and executed as these current reforms.

Whilst I realise that they are the result of a very expensive lobbying campaign from National Disability Services and were rushed through for political expediency, at some point I would hope common sense will prevail and someone like yourself will point out "The Emperor has no Clothes".

In brief:

1. NDIS is a crisis driven, rationed system that is unsustainable, age discriminatory and predicated on dependence.
2. It requires people to exaggerate their circumstances to obtain funding through a generic assessment process focussed on intellectual and physical disability.
3. 75% of people with a disability are ineligible to access funded disability service, no provision has been made for services for these people.

RSB Services

Adaptive Technology
Child & Youth
Community Education
Counselling
Employment Services
Guide Dog Service
Industrial Services
Library Services
Low Vision Centre
Mobility Services
Outreach Services
Peer Support
Print Alternatives
Recreation & Leisure
Systemic Advocacy

Knapman House

230 Pirie Street
Adelaide SA 5000
(08) 8417 5599

Adelaide

254 Angas Street
Adelaide SA 5000
GPO Box 1855
Adelaide SA 5001
Office (08) 8417 5555
Donate 1800 644 577
Email mail@rsb.org.au

Industrial Services

11 Blacks Road
Gilles Plains SA 5086
(08) 8417 5600

**RSB Guide Dog
Service**

11 Blacks Road
Gilles Plains SA 5086
(08) 8417 5656

Regional Offices

Mount Gambier
Christies Beach
Port Augusta
Smithfield
Victor Harbor

www.rsb.org.au

The Royal Society for the
Blind of SA Inc.

The RSB is a
recognised
NDIS service
provider (provider
number 35234897)



Quality
Accredited
Licence Number
00024

4. It ignores good practice, discourages independence and represents an expensive and inefficient layer of bureaucracy.
5. It makes no provision for specialist rehabilitation services which are more cost effective and empowering.
6. The above are repeated in the Aged Care Reforms which are designed for frail ageing and for which people with a disability, as a result of their age, are excluded from the NDIS and will need to seek support.

The RSB is a quality endorsed organisation and is the primary provider of specialist vision rehabilitation services in South Australia. As can be noted from the enclosed material, we provide the full range of rehabilitation services to over 12,000 people with exceptionally high levels of client satisfaction. Services include Low Vision, Adaptive Technology, Print Alternatives, Employment (Open and Supported), Independent Living, Mobility, Guide Dogs and Counselling. The RSB also relies on the support of over 900 volunteers.

In order to influence the design of the National Disability Insurance Scheme (NDIS) and to have the specialist needs of people who are blind or vision impaired recognised, the RSB has also recently commenced operations in the Hunter Valley Region of NSW, which is one of the NDIS Launch (now trial) sites for people acquiring their disability prior to the age of 65 years. As you are aware, South Australia is only a trial site for young children.

The RSB has been a strong supporter of the need for improvement in the availability and provision of disability services and has advocated strongly with both Government and the National Disability Insurance Agency (NDIA) to ensure people who are blind or vision impaired benefit from the introduction of the NDIS. However the NDIS as is being developed is a model controlled by Government and by its nature will be (as it already is) a rationed and crisis driven system from which the majority of people with a disability including people who are blind or vision impaired are excluded. It is also a system built on personal care services (rather than creating genuine independence) based on a "secret" generic conversation (assessment).

Indeed the current 70 page "secret" generic checklist which forms part of the "conversation" adopted by the NDIA is about creating demand not meeting specialist need with all potential participants required to undergo lengthy interrogation on all aspects of their life (whether relevant to their need or not) by a generic assessor seeking to create and justify large personal care packages, rather than assessing genuine need.

██████████ at the Centre for Welfare Reform noted many of these short comings after a Government funded visit to South Australia and many of these flaws can be observed in the UK which was the supposed model for the NDIS.

I am sure you are aware that during the first three months of operation of the four launch sites, the NDIS is 30% over budget, the number of applicants is 30% over expectation and it is taking up to 9 hours to formulate a plan (although I had heard informally that 27 hours is the current record).

The Productivity Commission noted that of the 4.2 million Australians with a disability, only 460,000 will receive services from the NDIS and the remainder will be required to seek support from the aged, health or other government sectors for their services. As you will appreciate with all these departments under budgetary pressure this is at best a poorly thought out strategy.

The effective denial of access to specialist disability services solely based on the age of acquisition will create substantial budgetary issues as these people are forced to seek far more expensive options such as residential care. It is also my view that this denial of services, based on the age at acquisition of a disability, is both morally and ethically abhorrent. I also believe it to be a breach of Australia's commitment to the United Nations Convention of Rights of people with a Disability of which Australia is a signatory.

With regard to the vast majority of people who are ineligible for the NDIS, advice from the NDIA representative at a recent Australia Blindness Forum (ABF) meeting was that the individual State Governments will provide disability services for these people. In my discussions with Government staff and Ministers in both the NSW and SA State Governments, this is certainly "news" to them. Irrespective the needs of these people will have substantial budgetary implications for one tier of government which at the current time is not being considered.

Clearly, in the absence of available disability services for those considered illegible by reason of their age or excluded based on a generic rationed assessment process, people will either fall into crisis or will exaggerate their disability to become eligible, hence placing greater pressure on an already rationed system. For those excluded by their age they will be placing similar budgetary pressure on the aged care system.

Rather than go into detail on the specific issues for people who are blind or vision impaired, I have attached as **Attachment 1** a copy of one of the many submissions which were made as the NDIS was being designed together with a media release from Jan McLucas and Jenny Macklin, **Attachment 2**, supposedly addressing these concerns. In spite of this media release, undertakings by Mr Bowen, CEO, NDIA, and recommendations from both Senate Committees on Disability and Ageing, the NDIA has been able to ignore these with complete immunity and continue to create, using greater tax payer funding, an efficient and wasteful system.

The exclusion of consideration of the needs of people who are blind or vision impaired was confirmed by Mr Bowen at a meeting in August, 2013 following which the RSB wrote to him, **Attachment 3**. At this stage we have been unable to even receive the courtesy of a response.

The RSB provides services to over 12,000 people who are blind or vision impaired, of which 8,000 as a result of acquiring their disability are over the age of 65 years, whilst being liable for the disability care levy they are ineligible to access disability services. Instead they are forced to seek services from a generic aged care sector that is designed for frail ageing providing personal or residential care. They also will be liable for some form of co-payment not applicable if their disability is acquired prior to the age of 65 years.

I have enclosed, **Attachment 4**, a copy of our submissions on the changes to the Aged Care System.

As you will also note **Attachment 3** the NDIA, despite Productivity Commission recommendations with regard to the economic benefits of block funding will not even review this issue in the next three years. Based on their current financial performance there will be no funds available in three years in any event, to introduce block funding despite acknowledgement in some circumstances of its efficiency.

Similarly, at the ABF meeting noted above, the same NDIA staff, when questioned on the current significant financial contributions made by agencies (the RSB contributes 60% towards the cost of services), advised that the NDIA has made assumptions that, despite the loss of block funding these agencies will continue to make the same financial contribution towards these services.

Clearly the NDIA, in making a statement of this nature has no concept of commercial reality and makes no consideration of the fact that fixed costs (the vast majority of RSB's costs) will need to be fully allocated to smaller income streams, thereby reducing available expenditure. There has also been no consideration of the effects of the disability care levy on philanthropy and volunteering and quite frankly at the end of the day why should any organisation provide a service using their funds for which the NDIA is responsible? Particularly when other service providers receive funding for the same service.

As you have gathered, the RSB has significant concerns about a poorly designed and rationed system being introduced that will effectively exclude people who are blind or vision impaired accessing funded specialist disability services.

A true reform should be about improving the quality of life and maintaining the independence of all people with a disability within reasonable budgeting constraints not providing all the resources to a select small group of people. Further it should be about a whole of government approach and not about cost shifting between tiers of government or government departments.

No new reform should have people living with a disability worse off. As you are aware the Prime Minister in his acceptance speech in September pronounced that "No one would be left behind". As you will observe from the above and attached, people who are blind or vision impaired, in the absence of change, will be substantially worse off and this will also have significant implications for future government budgets.

Accordingly in your capacity as Chairman of the Audit Commission, I seek your assistance in ensuring that these reforms are inclusive of people who are blind or vision impaired. In addition they represent best practice and not just a wish list created by generic assessors without any concept of how the delivery of specialist services can improve the lives of people with disabilities in a more economical way that by giving them a generic package of services.

Initial immediate steps include:

- The removal of the "age" barrier for specialist disability services.
- The introduction of a genuine assessment tool.
- Direct referral to specialist services immediately upon the identification of a specialist need.

- The introduction or continuation of block funding for specialist disability services until such time a genuine system can be put in place.

Thank you for your support. In the interim if you require any further information or I can be of any assistance please do not hesitate to contact me.

Yours sincerely

A large black rectangular redaction box covering the signature of the Executive Director.

Executive Director