

Assistive Technology Discussion Paper

Vision 2020 Australia is grateful for the opportunity to put forward a submission and response to the National Disability Insurance Agency (NDIA) Assistive Technology discussion paper.

The use of assistive technology by people who are blind or vision impaired is a critical enabler to virtually all aspects of life; from education, employment, independence in the home and community to sport, leisure and recreation. Therefore ensuring access to the right assistive technology through the National Disability Insurance Scheme (NDIS) that meets the specific needs of each participant is absolutely essential to the achievement of the goals and aspirations of this population group around Australia.

Vision 2020 Australia congratulates the NDIA in the progression of this important matter through this consultation. Vision 2020 Australia broadly supports the various submissions put forward by our member organisations, many of whom work within the low vision or rehabilitation sector.

We strongly support the key objectives put forward in the Assistive Technology discussion paper. We commend the NDIA for their intent to maximise participant control and choice, foster innovation and promote sustainability. However as a national advocate for the blind and vision impaired we are disappointed that there was no specialist representation from the vision loss and blindness sector, on either of the reference committees who contributed to the proposed framework and discussion paper.

Whilst we are keen to see how this consultation unfolds, we do have some concern regarding the paper's strong focus on reducing costs particularly regarding the potential to hinder individual choice and control.

A Visual World

Vision 2020 Australia recognises that all people with vision impairment utilise assistive technology to varying degrees in order to maintain their independence and lead fulfilling lives. For an individual living with blindness or a visual impairment having access to technology which is both appropriate and specific to their needs is essential to maintaining a high quality of life, mobility, independence and participation.

Assistive technology plays a vital role in an individual's ability to complete everyday tasks and achieve goals. More so, for many participants, access to appropriate equipment plays an integral role in ensuring equal opportunities for education and employment.

Vision 2020 Australia

Vision 2020 Australia represents around 50 member organisations involved in:

local and global eye care; health promotion; low vision support; vision rehabilitation; eye research; professional assistance and community support. We have drawn upon this unique position to present one voice to the NDIA regarding the issues raised within the Assistive Technology discussion paper.

Our policies and strategic plans ensure that work on avoidable blindness and vision impairment takes a disability inclusive approach. We know that the ability of Australian's who are blind or vision impaired to be independent and participate fully within society will be significantly improved through access to assistive technology. Recognising the transformative opportunity of the National Disability Insurance Scheme (NDIS), Vision 2020 Australia appreciates the opportunity to provide feedback to this critical element in the NDIS policy.

Requested Feedback

Do you think the participant capacity building framework will help participants reach their own decisions and give them better control over choices about assistive technology solutions?

Vision 2020 Australia broadly supports the NDIA capacity building framework and is pleased to see that maximising participant control and choice is high on the NDIA agenda. However, the success of the framework is largely dependent upon participant's being able to obtain information from sources of their choice. It will thus be imperative that providers of assessment services promote the availability of these services.

Building capacity to make an informed decision relies on an effective means to trial and compare products. Vision 2020 Australia has concern for participants in regional areas with travel limitations.

Whilst capacity building resources are most needed when an individual is newly diagnosed with vision impairment, competent or long term users of assistive technology may already have their own research options making it easier to build individual capacity.

Vision 2020 Australia would also draw attention to the descriptors, 'Novice', 'Developing' and 'Expert' which are quite broad. We would support the inclusion of a variation of competence with each descriptor, as discussed further in the submission put forward by Vision Australia. A case in point is the fact that most individuals, who may be classified as expert on certain functions of a particular type of technology, may be novice in the use of that same technology when applied to a different function i.e. the use of screen reading software for word processing as opposed to spreadsheets.

How useful would it be to have access to peer support people, such as Assistive Technology Mentors?

Vision 2020 Australia principally supports the concept of an Assistive Technology Mentor as a means of providing peer-to-peer and individualised support and understanding to participants. However this would require the mentor to receive regular training and competency testing to ensure their knowledge is current, fair and unbiased.

There is potential for a mentor to provide advice based on individual preference, without a comprehensive understanding of the participations circumstances. Peer support should have no affiliation with product suppliers. Vision 2020 Australia stresses that peer support should not be a replacement for professional advice, rather it should be complimentary.

How important do you think “expert advisers” will be in assisting with assistive technology solutions and decision-making? What are the main skills and attributes you think they should have?

Vision 2020 Australia believes that expert advisers have the potential to play a significant role in matching a participant’s need with the most appropriate technology. In order to achieve this, experts should take a holistic approach, looking at all aspects of the persons need and circumstances.

Expert advisers should be non-biased and should not be affiliated with retailers of specific technologies. An advisor should possess detailed knowledge of equipment options, should come from a range of professional backgrounds and be regularly assessed to meet specified competencies. Expert advisers should be skilled in liaising and collaborating with a range of stakeholders in the sector and should possess strong communication skills to ensure participations needs are met.

To this end, Vision 2020 Australia’s position on holistic specialist assessment is instructive here. Participants seeking expert advice on assistive technology, and other specialist clinical and functional outcomes for that matter, ought to have the ability to seek specialist advice from an accredited individual with expert knowledge specific to blindness and vision impairment. While expert advice in this context is specific to assistive technology, it may in fact be the case that the most appropriate approach for some participants, would be an assessment that takes into account a wide range of functional needs.

An example of this could be around reading and writing in conjunction with navigation technologies and catching public transport. While an individual may at first express a need related to literacy, they may be unaware that accessible technologies also exist to assist with mobility, such as Global Positioning Systems (GPS) and applications for smart phones to assist with train timetables and tracking ones journey.

Vision 2020 Australia recommends that the NDIA should develop a process that operationalises access to holistic specialist assessment, which includes: accreditation and registration for expert assessors; quality and consistency; and remuneration and reporting guidelines.

Provide suggestions for processes and/or activities to ensure that assistive technology solutions are identified correctly, with minimal error, and are effective in supporting participants to achieve their goals.

In order to empower and support choice among participants Vision 2020 Australia suggests the implementation of a review panel for assessing new solutions. Implementing trial periods, especially for highly technical equipment, would allow participants flexibility and foster choice. Online product reviews, made accessible to people with vision impairment, such as video demonstrations, as well as a centralised database of equipment and evaluations has the potential to inform and empower participants.

To ensure quality of assistive technology and support participant’s choice, Vision 2020 Australia supports the implementation of registered assessors, with mandatory qualifications to develop an accreditation or quality control framework for assessors. This is consistent with our recommendation above with regards to holistic specialist assessment.

What do you think of the acquisition and procurement approach (including have a third party entity manage the pricing sourcing and procurement arrangements and contracted supply agreements)?

While encouraging the NDIA's commitment to choice and control vision 2020 Australia strongly believes that the implication of third party acquisition, pricing and procurement will reduce choice through limited innovation and product availability.

The centralised Managed Sourcing and Procurement strategy appears to be primarily focused upon the premise of reducing cost. This has the potential to seriously hamper innovation as has been seen with the tender/panel approach to Disability Employment Services.

Under this model there is a risk that participants will not be able to effectively advocate for their needs and innovative solutions, especially when they make up a relatively small proportion of the disability community.

Vision 2020 Australia, along with our member organisations, are concerned that participant's choice will be limited to the brands and models preferred by the NDIA or another third party. There is a risk that larger suppliers will be favoured over smaller niche suppliers, over time reducing competition, product variation and innovation.

This is particularly true with the speed in which new technologies come onto the market and the frequency with which product upgrades occur. Equally, while a number of mainstream products have come onto the market, such as smart phones and tablets, other proprietary technologies specific to people who are blind or vision impaired, may in fact be preferred by individuals and offer specific functionality that is not as user friendly in mainstream products.

Vision 2020 Australia therefore recommends that while the acquisition and procurement approach has merit with regards to minimising cost, this should not undermine the first principal of consumer control and choice. Any policy in this regard must include a adequate flexibility to ensure participants have access to the right technology to meets their needs.

What do you think about the use of refurbished items (assuming that all appropriate health and safety procedures and necessary safeguards will be in place)?

While in favour of economic sustainability within the NDIA, Vision 2020 Australia has some concerns regarding the proposed price capping. For example, where a potentially lesser product is available within the pool the participant has the option of purchasing a newer model if they are able to meet the price difference. Vision 2020 Australia strongly believes that this could potentially lead to inequity between those who can afford to have that choice and those who cannot.

It should be noted that as technology updates so rapidly the refurbished item may become obsolete and a new piece of equipment may be a better economic choice than maintain ageing equipment.

Vision 2020 Australia is concerned that the refurbishment of equipment is based solely on reducing costs rather than exploring the potential of technology and how this can transform the lives of participants in a sustainable way. Assistive technology used by people who are blind or vision impaired is undergoing a revolution at present, with new products and options to address certain needs becoming available on a regular basis.

Vision 2020 Australia recommends that any policy around refurbishment must be balanced

against the functional outcomes achieved by the technology rather than on cost, that is, where the newer product offers greater functionality and operational stability in terms of participant needs, the newer product should remain an option at no extra cost to the participant.

In what ways could further innovation be introduced and explored so that NDIA participants can have access to the best and brightest technical solutions?

The scope for innovation within the NDIS is far reaching. As a national voice for people with disabilities, the NDIS has the ability to advocate for the development of new technologies. To fully embrace the opportunities that the NDIS has to offer there is a need to broaden the knowledge of the potential technology development to the wider community.

Vision 2020 Australia is concerned that the discussion paper is inhibited by ordinary market forces, through panel proposals with strict key performance indicators (KPIs) and contracts with no real suggestions regarding how to facilitate investment in innovation.

Vision 2020 Australia in line with the submission put forward by Vision Australia believes that innovation would occur if the NDIA were to successfully collaborate with the commonwealth, state and local governments to ensure that accessible public procurement policies are implemented nationwide.

Another suggestion is to seed investment for partnerships with technology industries to explore technological substitution that can enhance choice and control in participant's lives. It may also be useful to involve the health and age-care sectors.

It is essential that the NDIS encourages design and development innovation within Australia, particularly within the vision impairment field where innovation seems to occur internationally.

Additional Comments

Vision 2020 Australia contends that access to expert training is absolutely critical to the competent use of assistive technology and must be a central feature of any policy in this regard. While Vision 2020 Australia supports the access of participants to peer trainers, there ought to be clear guidance provided to participants around the limitations of peer trainers and a clear option to undertake training by an accredited trainer/program with certain quality safeguards for that training.

Additionally, the discussion paper seems to be addressing adult needs and not clearly accounting for the needs of children. For example there appears to be a lack of consideration regarding the needs of a child at school and at home and the impact of technology acquired through the NDIS. Vision 2020 Australia considers that a child who is blind or vision impaired and uses assistive technology both at home and at school, should be empowered by the NDIS with the ability to have the technology of the same quality, functionality and capability in whichever environment they use it.

We also note that age limits are applied making it difficult for people over 65 to access equipment. Vision 2020 Australia seeks to ensure that all people who are blind or have functional vision loss will have access to equitable disability services and support and will not be disadvantaged on the basis of their age.

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