

Friday, August 9, 2024

NDIS Consultations  
Department of Social Services  
GPO Box 9820  
CANBERRA ACT 2601

Dear Sirs,

Established in 2020, Assistive Tech is one of Australia's Largest registered providers of Low-Cost Assistive Technology to NDIS Participants. We are uniquely positioned to provide feedback on the definitions associated with the draft list of NDIS Supports that are currently open for consultation, in particular the Communication and Information Equipment category.

The Communication and Information Equipment Category is a category of products that is experiencing rapid innovation. This pace of innovation is not slowing and as technology continues to evolve, Australians with a disability will rightly want to take up opportunities to leverage these technologies to meet their needs - often in place of what previously may have been a high-cost disability specific product or support.

Innovative care, service delivery and support have rightly been acknowledged as one of many ways the community can work together to moderate the pace of cost growth in the NDIS. It is in this light; we strongly advocate for a clearer definition of supports in the Communication and Information Equipment Category.

Take for example an iPad. It is widely agreed that as a device this is a mainstream product that many Australians use and access in education, the workplace and at home for entertainment. If procured for this purpose this would rightly be excluded from funding under the NDIS.

What then if an NDIS is purchased as a dedicated device, combined with an Augmentative and Alternative Communication Application and appropriate rugged amplification case for everyday use. If procured for this purpose this device can and is funded by the NDIS noting that alternative dedicated communication devices are often three to four times more expensive.

Then we consider a watch for example an Apple Watch. This is a mainstream product that in most circumstances is used for convenience. If procured for this purpose, the product would rightly be excluded from funding.

What then if that same watch was procured for the purpose of replacing a disability specific communication device that comes in a watch format like a GoTalkGo and is approximately the same cost.

Consider an Australian that cannot attend their local shopping mall without experiencing complete and overwhelming sensory overload as a result of their disability isolating them from their community and the necessities they require.

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Perversely this participant could access the services of a support worker to help them complete their grocery shopping each week at a significant annual cost - but we wouldn't fund the low-cost noise canceling headphones for \$300 that would allow them the independence to complete these activities independently.

As a specialist provider that is intimately familiar with adapting mainstream products to address disability needs - often at the same or lower cost than equivalent disability specific products, the published "List of NDIS Supports" fails to address the needs of Australians with a disability.

The List of Categories and Products as published fails to acknowledge that you cannot consider the product in isolation. These lists need to consider the purpose of the product purchase, how the product will be used to meet the needs and goals of the individual and whether actually a mainstream commercially available product may be the best product for the participant in the circumstances.

As published, this List of Supports will not deliver on the needs of Australia's NDIS participants, it will simply drive participants to purchase higher cost items that are disability specific, force them to consume additional high-cost labour-based supports and eliminate the ability for participants and providers to work together to deliver innovative new ways of meeting their needs.

Assistive Tech implores you to reconsider your approach - a "List of Supports" absent implementation context, and specialist advice is simply not fit for purpose for Australians with a disability and would welcome an opportunity for meaningful engagement on designing a fit for purpose approach.

Yours Faithfully,



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