



**SUBMISSION**

**The National Disability Insurance Scheme  
COAG Consultation  
Regulation Impact Statement**

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## Background

Ai-Media (Access Innovation Media Pty Limited) is a social enterprise dedicated to ending the experience of exclusion that people with disability face, and has been a long-time advocate for the NDIS.

Founded in 2003, Ai-Media introduced captioning to subscription television in Australia – a service that has now grown to deliver over 200,000 hours of captioned viewing per annum.

In 2009 Ai-Media began piloting Ai-Live, a world-first innovation delivering internet-based real-time captioning in classrooms for the benefit of deaf children in mainstream schools, allowing them to read what the teacher is saying within 7 seconds.

Following a successful preliminary pilot in NSW, Ai-Media was awarded a \$1.7m Commercialisation Australia (CA) grant in 2011 to take Ai-Live to commercial-level scalability.

Ai-Media was awarded a second round of CA funding of \$264,000 in late 2012 to extend the application of Ai-Live to benefit students with other disabilities, following evidence in extended pilots in NSW and Victorian schools that real-time captioning and transcripts could benefit all students.

Ai-Live also delivers access to employment, conferences, events and higher education for people with disability, and can be purchased for an hourly charge.

In addition, Ai-Media provides transcription, audio description and web accessibility services.

Ai-Media's prior contributions to the Productivity Commission reviews and NDIS-related consultations (submissions and testimony) are referenced on its website.<sup>1</sup> Ai-Media thanks COAG for incorporating our feedback in response to the consultation on Eligibility and Reasonable and Necessary Support.<sup>2</sup>

## Commentary

Ai-Media thanks COAG for the Regulation Impact Statement (RIS)<sup>3</sup> and for the opportunity to comment on what promises to be transformational, albeit long-overdue, reform of the disability sector.

The Options and Impacts contained in the RIS are comprehensive, and Ai-Media supports an approach that maximises choice, control and flexibility – while minimising risk and maximising quality assurance for clients.

Ai-Media concurs in rejecting the status quo of “Option 1” block funding because of its failure to deliver choice and control for people with disability and carers. Conversely “Option 4” is inappropriate as the unfettered free market will fail to manage risk and

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<sup>1</sup> <http://www.ai-media.tv/About/Ai-Media-policy-positions>

<sup>2</sup> <http://ai-media.tv/downloads/file/2012%2009%2028%20%20Ai-Media%20Eligibility%20and%20Reasonable%20and%20Necessary%20Support%20Submission.pdf>

<sup>3</sup> <http://www.coag.gov.au/sites/default/files/National%20Disability%20Insurance%20Scheme%20-%20Consultation%20Regulation%20Impact%20Statement.pdf>

ensure quality delivery for personal and human services under the NDIS (including on behalf of vulnerable citizens).

While ultimately supportive of the end-goal of “Option 3” for the reasons contained in the RIS, there are transitional and market risks that urge caution in moving too quickly from the status quo.

“Option 2” is likely to be useful in the transition – and will deliver significant benefits over the status quo.

There are also important questions as to whether supports are more appropriately delivered as part of a universal service obligation, or an individual support package (ISP). It may be that some services transition from the latter to the former as accessibility improves in line with progress on the National Disability Strategy. An example may be that an ISP including accessible taxi vouchers would not be required once public transport is made accessible.

Block funding may also remain appropriate in areas of ‘thin markets’ (p 40).

In a reform of the scale of the NDIS, flexibility in implementation is important, as is the transition planning.

We recognise the diversity of people with disability, and see merit in tailoring regulatory oversight based on assessments of risk in line with “Option 2(iii)” and “Option 3(iii)”.

We congratulate COAG on its commitment to a whole-of-government transformation in disability services, and look forward to learning from the experiences in the launch sites, and the opportunity to make further comment in due course.