NDIS Guide

to Vehicle Modifications.

2022 Edition



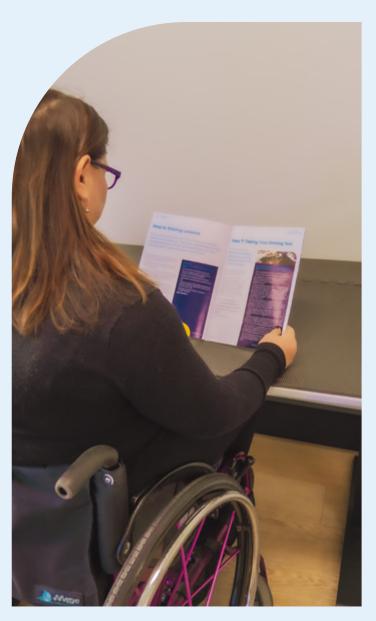
For those who love to drive!





Firstly, the team at Total Ability would like to say thank you!

Occupational Therapists (OTs) play an essential role in helping people with disability safely get on the road and live a more full and active life through driving.



We understand that the process of applying for vehicle modifications through the NDIS can be complicated and challenging. We also understand that a successful funding application can be life changing.

Our goal with this guide is to support the clinicians involved in the NDIS application process. In turn, this helps the many people in Australia who are currently unable to drive due to lack of access to appropriate assistive technology.

While we don't have all the answers, we have learned a thing or two about applying for funding for vehicle modifications over the last decade...

As a token of our appreciation, we would like to pass this information on to the clinicians and customers who have supported our business since we opened our doors in 2011.

This guide covers an overview of the information OTs need to know to make an application to the NDIS for vehicle modifications. It does not replace guidelines available from the NDIS, or your clinical judgement, but seeks to compile all the relevant information needed into a user-friendly guide.

The guide covers:

1. Initial Assessment	5
2. Understanding The Plan	8
3. Assistive Technology and the NDIS	10
4. State Motoring Authorities	12
5. Assessment Considerations	15
6. Quotes and Evidence	22
7. High-Cost Vehicle Modifications	24
8. Completing the NDIS Application	27
9. After Lodgement	31
10. Checklists	32

We would like to credit the people who voluntarily contributed to the development of this Guide. Your assistance is greatly appreciated!

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How to Use This Guide.

This guide can be used in two ways.

Start to Finish

Firstly, the OT (or person assisting with the application) can follow the guide from start to finish. This will take the reader through the entire process of applying for vehicle modifications through the NDIS from start to finish. Unless you are already very familiar with the process, this is our recommendation. It is VERY easy to miss a step or key piece of information in the application process, which will result in avoidable delays in funding approval.

Many people find going straight to the NDIS application quite overwhelming. There is a very large amount of specific information that needs to be included, all of which will take time to gather. Completing the application is actually the second last step of our guide. We find that coming to the application with a calm, clear head, confident in the knowledge that all relevant information is on hand, generally achieves the best results.

By Section

The second approach to using the guide is to refer to certain sections as needed. This would be suitable for people who are already quite familiar with the process of applying for vehicle modifications through the NDIS and are looking for some prompts or clarification around particular topics.

For both approaches, we have included comprehensive checklists at the end of the guide.

This is handy to refer back to at any stage of the process to ensure no steps have been missed, and as motivation to keep going because there is an end in sight!

We can't guarantee success for every application. But we do know that when the process outlined by the NDIS is followed from beginning to end, and all required information is submitted in the correct format, chances of a positive outcome increase.

1. Initial Assessment

Before starting an application for NDIS vehicle modifications your client must have formal 'Medical Fitness to Drive'. To obtain this, they will need to ask one of their treating doctors (GP or specialist) to fill in the appropriate assessment and forward it to the relevant State Motoring Authority.

Back to Basics

Once fitness to drive has been established, it's worth going back to basics and beginning with a thorough review of the client's medical information.

This might seem a bit pedantic (particularly for the more experienced OTs), but before you think we're trying to tell you how to do your job, hear us out!

Your 'audience' for the application is staff at the NDIS (actually the NDIA, who then instruct the NDIS, but we will just refer to the NDIS). These staff are very skilled and experienced, but often have a more generalised knowledge base about medical conditions and disability. One of the biggest mistakes that can be made in an application for vehicle modifications is skipping through the basic information and going straight to the complex stuff.

We recommend beginning by developing a summary of your client's medical information that can be understood by anyone involved from hereon in. It can be helpful to write this out in a 1-2 page document, as it is very likely you will have to provide it to several people.

You will be covering most of these details in your standard clinical assessment. What we outline here is simply a guide to convey the relevant details in a convenient format.

Medical information should be pitched at a level that informs health professionals from all backgrounds of the pertinent issues and yet can also be understood by non-clinical staff.

While funding decisions are primarily based on objective assessments, don't forget to include a personal narrative about your client. Explaining just how much of a positive difference vehicle modification could make to your client's life can help to strengthen the overall application.

Some sales acumen can go a long way here. Like it or not, advocacy is a big part of all NDIS applications. The NDIS is an insurance system after all, and while they generally approve all reasonable claims, there is some wiggle room to get a better deal, so to speak, for your client.

Client Summary

There is no set template, but as a general guide we suggest writing up a document with the following (condensed version with examples):

- Introduction to your client David, or Dave as he prefers to be known, is a 33-year-old man who lives alone with his dog Shelly in a Department of Housing unit in Parramatta.
- Outline of general medical information -Dave has several medical issues, including type 2 diabetes, mild cognitive impairment (due to traumatic brain injury), and left sided hemiparesis following a motor vehicle accident when he was 19 years of age. Since engaging in extensive rehabilitation over the past decade, Dave's treating team at Westmead Rehabilitation Hospital have advised that he has recovered to the maximum extent possible, and his current level of impairment is expected to be permanent.
- Expand on relevant medical information -Dave does not have the strength in his left arm and hand to grasp and control the steering wheel, so will likely require an electronic steering wheel aid. Weakness in his left leg would restrict driving to automatic vehicles only. His Rehabilitation Physician and General Practitioner both feel that with appropriate vehicle modifications and driver training support, Dave would be able to operate a motor vehicle safely.
- Offer to provide further evidence as required - I have collected relevant medical reports that outline Dave's medical conditions and with Dave's consent, would be happy to provide these as required.

Link back to NDIS plan goals (covered in more detail in the next section) - Approval for vehicle modifications aligns closely with Dave's NDIS goals of improving access and inclusion in the community. Dave is currently severely limited in his ability to see his family, as his mother and sister live too far away to access by public transport and other transport arrangements are cost prohibitive.

Writing out this document is not mandatory, but it will likely save you time in the long run.

Vehicle modifications can take a long time – around 6 months for funding approval, then up to 3 years until all modifications are installed (particularly for car/van floor conversions). Having a pre-prepared summary on hand can save A LOT of time when liaising with the numerous people involved throughout the application process, as you can simply send this summary through as an introduction/overview of your client's situation.

Now that we've covered the first step, let's move onto how the NDIS plan fits into all of this.



☐ Top Tip

- Start thinking about what reports, assessments and evidence need to accompany the application.
- Direct your client to the relevant pages from the NDIS so they can read up on the process.
- Try to tell a story. You are going to need the cooperation of a lot of people to get this done. Explain to them why working with you and your client will be a rewarding experience.



2. Understanding The Plan

Anyone who has worked with NDIS clients will likely have heard discussion about "The Plan".

You might be familiar with what an NDIS support plan is already. If not, don't worry. Clinical staff often aren't involved in this process, as it is more focused on the overall goals and practicalities around arranging supports and funding.

In short, an NDIS plan outlines a client's goals, aspirations and support needs. It also details the funding they have available that can be used for certain categories of supports, services and equipment. Everyone on the NDIS has their own unique plan that is reviewed and updated at set schedules, or when support needs change.



So why do you need to know about the plan?

Firstly, it is how an NDIS client can engage your services. To fund an OT assessment for vehicle modifications, funding must be available in your client's capacity building supports budget and they need to be willing (and able) to utilise a portion of this to cover the costs of your input. They can apply for more funding in this area if required, but it is worth checking with your client (or their support staff, such as Local Area Coordinator or Support Coordinator) that they have sufficient funds available to at least begin the process.

Secondly, everything the NDIS funds for an individual must align with the plan.

The plan details what level of funding a participant receives for each category of supports and services, including equipment/assistive technology, which comes under capital supports. There is a little room to shuffle around existing funding, but when it comes to higher-cost items like vehicle modifications, it's safe to assume that if it's not specifically in the plan already, it will need to be included.

In essence, the goal of an application for vehicle modifications, is to have an appropriate allocation of funding added to a client's NDIS plan, so that the process of obtaining modifications can begin.

If your client consents, it can be handy to view or keep a copy of their plan. The plan is not automatically shared with service providers and clinicians, as first and foremost, it is developed for the client. You might like to explain that if your client would like to share their plan, it will provide valuable background information for your assessment and save them from having to explain their entire situation again.

Either way, your assessment and application to the NDIS will have a much greater chance of success if it is framed in the context of NDIS plan goals.

Vehicle modifications might already fit within an existing plan goal. For example, if 'accessing the community independently' is a client's plan goal, vehicle modifications clearly align with this. It is just as likely that a new plan goal will need to be developed, however.

Where driving wasn't considered possible previously, your client may not have thought much about goals in this area. Examples of some new goals related to driving might be obtaining employment or maintaining connection with family.

As an OT, it won't be your responsibility to arrange a plan review, but you may be asked to provide advice and guidance on any upcoming review. To ensure adequate funds are allocated, we suggest providing a support letter detailing the client's therapy needs regarding the OT driving assessment and the assistive technology application for vehicle modifications. This letter should include the hours of therapy required, hourly rate and an overview of what the OT input/assessment would involve.



Top Tip

If you aren't already familiar with them, read up about the role of a <u>Support Coordinator</u> and <u>Local Area Coordinator</u>. These are the two main staff who are likely to be involved in developing and implementing your client's NDIS plan. You will almost certainly liaise with one or both throughout the process of applying for vehicle modifications.



3. Assistive Technology and the NDIS

Aside from aged care and medical treatment, the NDIS funds virtually every aspect of care and support for people in Australia living with disability.

To provide some order to this gigantic system, funding for different supports and services are organised into different categories. You don't need to know them all, but it pays to be familiar with the ones related to your day-to-day work. In the case of vehicle modifications, the category of interest is assistive technology, or AT.

There are some basic rules in place that NDIS like to work within for AT. However, with the right information and reasonable justification, necessary products can still be approved outside of these general rules. Often, approval can come down to how well your report presents the justifications.

Let's have a look at the decision-making process the NDIS applies to assistive technology.

Decisions on AT are made using <u>Section 34 of NDIA</u> <u>legislation</u>. The overarching principle here is that the supports need to be **reasonable and necessary**.

If we apply this framework to a decision about vehicle modifications, the following must be met to gain funding approval:

- a. The modifications will assist the participant to **achieve and pursue their goals** (as per their NDIS plan).
- b. The modifications will assist the participant to access the community to pursue social and economic participation.
- c. The modifications represent **value for money**. Costs are reasonable relative to the benefits to the participant and in comparison, to the costs of alternative support methods.
- d. The modifications proposed are likely to be beneficial and effective for the participant, having regard to current good practice.
- e. The modifications **take into account what is reasonable to expect might be provided**by family, carers, informal networks and the community.
- f. The modifications are most appropriately funded or provided through the National Disability Insurance Scheme (for example they cannot be alternatively funded via Job Access or iCare or other more appropriate means).



You will note that there is a fair bit of scope in the above points for subjective opinion. Clinical reasoning and assessment are definitely the main factors in terms of NDIS approvals, but the personal narrative about your client and the impact funding (or lack thereof) will have on their life comes a close second.

Some important points to be aware of about NDIS funding for vehicle modifications.

- "Vehicles aged less than 5 years and under 80,000km are generally considered suitable to modify. However, older vehicles and those with higher mileage may still be considered where there is evidence that their modification would be cost effective." NDIS Website
- Modification must have been assessed by a suitably qualified professional assistive technology assessor (usually an OT or Driver Trained OT) and supplied and installed by a supplier in line with the relevant standards and state or territory regulations.

- The participant must own the vehicle, or if someone else owns the vehicle, the participant must have written approval to access that vehicle for their transport needs.
- The participant (or other person) is able to fund the running costs of the vehicle, such as registration, insurance, fuel, repairs and maintenance. It is good practice to include a 'road worthy certificate' from the client's mechanic if possible, confirming that the vehicle is in good working order and well serviced.

The NDIS can fund just about every aspect related to vehicle modifications. Assessment, driving lessons, fees for vehicle certification, increased insurance premiums resulting from modifications, extra transport while components are being installed. Basically, if you can put a case forward for why a support or service is required as part of the process for vehicle modifications, there is a reasonable chance the NDIS can allocate funding in a participant's plan.

We have covered the most important points related to guidelines underpinning decisions around funding for vehicle modifications. However, the NDIS may also prescribe certain methods or criteria to assist in making a decision at their discretion.

4. State Motoring Authorities

The other Government department NDIS clients and OTs need to keep in mind when applying for vehicle modifications is their State Motoring Authority.

Each State Authority regulates two important aspects related to vehicle modifications for people with disability - licensing and certification of modifications.

Please note, this is a BIG topic.

As an example of how the process works, we will cover the main points below for NSW, but **it is essential that you check your State's guidelines**. We have included a page at the end of this section with links to each relevant State Authority.

If you are in a State other than NSW and are unfamiliar with what licensing and certification involves, we still recommend reading through the rest of this section. It will provide important context, so that when you refer to your State's guide it makes a bit more sense. There are similarities with the principles and processes in each State, but you will of course need to follow the guidelines that apply to your client.

Transport for New South Wales (TfNSW) has put together a guide on <u>Modified Vehicles For People With Disability</u>. This guide sets out the steps that need to be undertaken in chronological order, many of which overlap with the NDIS requirements for vehicle modifications.

Be aware of the required driving assessments

Rightly so, the TfNSW guide points out that speaking with an OT for an assessment is the first step for anyone needing vehicle modifications. They link to essential info on <u>driving assessments for people with disability</u>, including:

- Medical Assessment for Fitness to Drive This is an important point. Drivers undergoing an assessment must meet the Austroads medical guidelines. To ensure compliance, a medical fitness to drive assessment must be completed by your client's doctor to ensure they are medically cleared to drive. This needs to be done before commencing a NDIS application for vehicle modifications. Your client also needs to report all long-term medical conditions or disability to their State Motoring Authority.
- Occupational Therapist Driving Assessment

 State Motoring Authorities and the NDIS consider vehicle modifications a specialised area of practice. To determine the most appropriate vehicle modifications, the doctor may recommend the driver undertake an occupational therapy driving assessment. We work closely with a network of <u>Driver Trained OTs</u> if you or your client need assistance with this step.

- **Disability Driving Test** A Disability Driving Test is required for anyone driving with vehicle modifications. This may be undertaken either in the participant's vehicle (if modifications are already installed) or a Specialised. Driving Instructor's car/van (with equivalent modifications to those being proposed). Note: some States do not require this additional testing. The Disability Driving Test is the same as a standard driving test, but is completed in a vehicle that has been modified. The NDIS may require participants to pass a driving test with their State Motoring Authority before they approve modification funding, especially for high-cost items. The NDIS may consider funding the modifications before the class C licence is reinstated, if the OT can state that the person has demonstrated capacity to learn and is progressing toward achieving a safe standard of driving.
- Special Licence Conditions Licence conditions are legal requirements a person must follow while driving. To drive with vehicle modifications, the driver must have the relevant conditions endorsed on their licence. These conditions will be added to an existing licence if your client already has one.



Find a qualified modifier and certifier

Certain vehicle modifications require certification via TfNSW in accordance with the *Road Transport* (Vehicle Registration) Regulation 2017, aka 'The Regulation'.

Certification is needed when modifications are made to such an extent that the vehicle can no longer comply with certain vehicle standards in The Regulation.

The main point to be aware of here is that it is essential to find a qualified installer/modifier and certifier to work with. A qualified certifier is someone who is <u>licenced by the VSCCS</u> to undertake vehicle certification. The installer will work with a licenced certifier to approve the modifications made. If you need a hand finding an <u>installer</u>, just let us know.

A qualified installer knows all the ins and outs of vehicle modifications and TfNSW certification. They will be able to work in collaboration with you and your client to achieve the goals in the NDIS plan. An installer can advise whether planned modifications are considered 'major' or 'minor' under The Regulation and what certifications and exemptions might be required.

State/Territory Motoring Authority Links

Use one of the links in the map below to check the rules in your State.



NSW	https://www.rms.nsw.gov.au/roads/licence/health/driving-with-disability.html
QLD	https://www.qld.gov.au/disability/out-and-about/travel-transport/driving
VIC	https://www.vicroads.vic.gov.au/licences/health-and-driving/driving-with-a-disability
TAS	$https://www.transport.tas.gov.au/licensing/health_and_driving/driving_with_a_physical_disability$
SA	https://www.sa.gov.au/topics/driving-and-transport
WA	https://www.transport.wa.gov.au/licensing/my-drivers-licence.asp
NT	https://nt.gov.au/driving/driverlicence/existing-nt-licence/medical-fitness-to-drive
ACT	https://www.accesscanberra.act.gov.au/app/answers/detail/a_id/505/kw/disability

5. Assessment Considerations

Before we progress further, here are some questions to consider about various types of vehicle modifications.

Be prepared, this is a LONG list. It might seem like a lot to get through, but many of the points here include some of the most common mistakes we see with applications for funding.

Getting the application right the first time can save a lot of unnecessary delay and frustration down the track, so try to get through all these points if you can, or at least the ones relevant to the current assessment you are working on.

Why can't the client use their existing vehicle as is?

If the client already has a vehicle, you will need to clearly explain why they can't use it now. This will likely be related to a change in functional ability. Keep in mind that **these changes need to be permanent and not amenable to treatment or rehabilitation.**

Some reasons a client can no longer use their vehicle might be:

- 1. New injury, illness or deterioration of condition
- 2. The client's mobility, dexterity or functional ability may have changed
- 3. They can no longer access or transfer in and out of the vehicle
- 4. They can no longer drive the distances required for social and economic participation

Is the vehicle suitable for the products considered?

The product being considered must be compatible with the vehicle in question. Here is a breakdown with some examples from common products.

Hand Controls – Age of the vehicle and the ability to install electronic accelerators and controls can affect the suitability of hand controls. Ensuring enough leg room to cater for the added equipment is important. The ability to maintain knee airbag integrity may be a factor to consider (although RMS exemption may be possible). Restraint requirements and other accessories (e.g. push button start, electronic hand brake, docking station, headrest indicators, voice control etc.) also need to be factored in.

Turning Seat Bases – Suitability is usually determined by the minimum door jamb measurements required. If there is not sufficient clearance a turning seat base may not be an option. An aftermarket seat may be required to accommodate the raised profile with the proposed base. Another consideration may be the need for a seat reclining feature. When there are airbags in the seat or existing electric controls, these may be lost.

It is also rarely possible to install a turning seat base on the driver's side due to reduced turning clearance from the steering column. Consult with an installer first.



Scooter/Wheelchair Hoist – Boot clearance and space will determine initial suitability. The wheel well configuration to install the base plate is also an important factor to consider. The client's need for manual or automatic rotation will guide the product choice. The need to fold the hoist down, and other factors such as the weight, measurement and configuration of the scooter/wheelchair being lifted need to be considered.

Transfer Platform – Suitability will be guided by the seat control interference, space available between seat and door jamb, and height of the existing seat. The profile of the existing seat, size and weight of the client also impacts the product choice.

Ramps - Boot clearance and space determine suitability for a ramp. The height from bumper or side entry to ground (which determines the ramp angle ratio - 1:6 is required) will affect a rear or side installation. The weight of wheelchair and occupant, plus strength and dexterity of operator will guide manual or electric options. Future client needs must be considered, e.g. is a platform lift more appropriate long-term? The need for ramp swivel feature and seating access once inside the vehicle (docking, restraints, seat removal, etc.) all impact suitability.

Platform Lift – Vehicle type must suit platform lift dimensions when folded. The wheelchair weight will guide the choice of lift due to load ratings. The roof clearance for the person in the wheelchair will be determined by the height of the client in their wheelchair. The dimensions of the wheelchair will affect the width and length of the platform required. Internal configurations to accommodate the lift and the wheelchair, floor to roof height of the vehicle, and securing the wheelchair once in the vehicle are all factors to consider.

What are the ergonomic features of the proposed product?

With all products, it is important to consider ergonomic features to ensure long term use, plus health and function preservation of the people using them. Here we have listed some things to consider for each type of product to determine the level of ergonomic features required.

Hand Controls – Amount of strength and core position required, plus dexterity of client and ability to avoid Occupational Overuse Syndrome (OOS) need to be considered. Product features are available that reduce fatigue and future shoulder damage. The ergonomic features should be able to align with a deteriorating condition. Overall level of customisability of the product is important.

Turning Seat Bases – Ergonomic factors include programmability of the product and the seat choice for installation.

Scooter/Wheelchair Hoist – Level of automation of the product (2-way or 4-way), level of independence required to utilise the product, customisation of product controls, strength and stability required to operate the product independently.

Transfer Platform – Materials used for the seat, width of the seat, client's strength to use it, dexterity required and ease of operation.

Ramps – Strength and independence required to operate the ramp, weight of the manual ramp, ramp angle of the product (1:6 ratio required unless exceptional circumstances), customisable programming and automation of electric ramps, noise produced whilst travelling.

Platform Lift – Positioning of controls, wireless capability, noise produced whilst travelling.

What are the quality features of the product?

Considering the quality features of a product will contribute to the end decision on what is funded. The NDIS wants to ensure that the products meet legal standards and requirements, as well as providing functionality for the participant to achieve their goals.

Things to consider include: Do they meet State
Transport Authority requirements? Are they
compatible with the client's vehicle for installation?
Are the products tested to meet Australian
Standards. These considerations all ensure that
quality products are put forward to be funded.
Discuss quality features with equipment providers
and licensed vehicle certifiers. Be sure to include
these details in your report to strengthen the
application.

Is the product customisable now and adaptable for future client needs/changes?

Future proofing a participant's needs is important when applying for vehicle modifications. Showing that a product is adaptable for changing needs will reduce the questions raised by NDIS and increase the chance of funding approval. Here are some examples to consider.

Customisability of hand controls can be achieved by changing end knobs on levers. Re-programming the accelerator/brake function can cater to changes in client's strength. The ability to add auxiliary controls later or change one part of the hand control rather than a complete re-install can be a beneficial point to make.

Choosing a platform lift versus a ramp may meet future needs (as well as current) more effectively as a client's needs change.

Is the client able to transfer the product to a new vehicle in the future?

Transferability of products to future vehicles can ensure longevity and value for money when requesting funding. Many products can be transferred to another vehicle, but specific considerations may need to be factored in to ensure it is possible for each product type.

Where possible, make comments in the funding application about the potential for products to be transferred to future vehicles, plus the 'make good cost' for the original vehicle (see below for further info).

Hand Controls – The vehicle will need to be decertified and new vehicle recertified when transferring products (Note: For some States only). Exemption requirements for knee airbags need to be considered if positioning of hand controls needs to change. Also, some products are vehicle specific in their installation and may need reprogramming to function in a new vehicle.

Turning Seat Bases – The vehicle will need to be decertified and new vehicle recertified when transferring products. (Note: For some States only). The seat replacement requirements vary for each vehicle (e.g. if an aftermarket seat has been used). Airbag exemption requirements may need to be applied for. Door jamb measurements for the new vehicle will determine transferability of the product. The original seat controls may be affected when reinstalling to return the vehicle to factory configuration. Note: Sometimes it may be more cost effective to install a new product rather than transferring to a new vehicle.

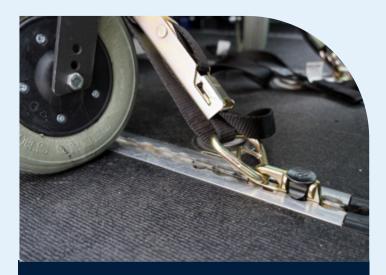
Scooter/Wheelchair Hoist – Boot measurements and wheel well layout of the new vehicle, 'make good' costs on original vehicle boot upholstery.

Transfer Platform – Height differences of vehicle seat may impact the ability to reinstall into a new vehicle (particularly if the transfer platform was cut down to suit the first vehicle).

Ramps – Boot and space clearance will need to be considered for the new vehicle. Tailgate or side doorstep height is to be sufficient to ensure 1:6 ratio is achieved for the ramp angle.

Platform Lift – Boot and space clearance will need to be considered for the new vehicle, tail gate or side doorstep height, head height clearance for the wheelchair user.

In all the above, added removal and refit costs will need to be factored in.



Top Tip

- 'Make good cost' is a term used to describe the cost of restoring a modified vehicle to its original condition (usually for resale). This is an important consideration when looking at the feasibility of transferring equipment to a future vehicle, plus for calculating overall costs of modifications.
- equipment from the original vehicle, but if there is then a large cost to restore that vehicle to its original condition, transferring products may not actually be viable. Some high-cost modifications (like vehicle/van conversions) are generally nontransferrable and would be 'stuck' with the modified vehicle.

What other accessories or supporting products are required?

When considering vehicle modifications, supporting products or accessories are often needed to ensure the client can access their vehicle to drive or be a passenger in it. There are auxiliary products that will enhance the function of the main modification.

For example, when installing hand controls, a harness for the driver to ensure their stability whilst driving might be advisable. A transfer platform to access the vehicle may be required, or a hoist for stowing a wheelchair. Auxiliary buttons required to access lights, indicators etc. on the brake lever could be needed.

Some other supporting items may include panoramic or fish-eye mirrors, foldaway headrest (if driving from wheelchair), indicator extenders, wheelchair restraints, docking stations, voice command, push-button start, gear shifter, electronic hand brake and various spinner knobs for different abilities.

To maintain driveability of a manual car an electronic clutch may be required. An extra cushion for the driver leverages seat height or can reduce pressure sore risk. End knob customisation on hand controls, automatic door openers, ramps, hoists, platform lifts and turning seat bases can all support a hand control installation.

Items commonly missed on quotes include arm rests, extra padding, bracketry, upholstery protection for wheelchair components, strap on hatchback boot for independent operation and side guard protectors for driver side to protect paint work from wheelchair transfers.

How does one product compare to another? Is one more suitable to the client's needs than another?

When comparing products there are many levels of comparison to consider. Aside from the aesthetic component, you must also consider:

- the technical function and applicability
- the quality of manufacture

- the technical post-installation support
- replacement parts availability and ongoing service required
- the comfort level for the client to use the product
- · personal preference of the client
- alternative cost if certain products are not funded or approved
- what is considered reasonable and necessary

These all help come to a decision for the final products being recommended for funding.

Is the preferred product cost-effective?

The cheapest item is not always the most appropriate. NDIS will fund a more expensive item if they deem it reasonable and necessary. It is important to articulate the reasons why one product is more appropriate than another when making recommendations. Presenting the alternative cost of not supplying the preferred item can be an effective approach here.

In the example of the push/pull hand control and the satellite accellerator/brake, the push/pull hand control is the less expensive item. The satellite accellerator/brake may, however, be a much safer choice, as it does not require the knee airbag to be disconnected, keeping the safety features of the car in place to protect the driver. The satellite accellerator may also be more ergonomic, with less wear and tear on the driver's joints. So whilst the push/pull hand control may be less expensive, the satellite could be considered reasonable from an ergonomic perspective and necessary due to safety.

You should also link the justification for a product to a functional reason. This might relate to shoulder pain, long-term shoulder preservation, knee clearance in the foot well, etc. It is good to use a pain scale rating to rate the client's shoulder pain when at rest compared with when using their old-school push/pull control for long drives. Finally, link product cost to transferability long term and the impact this may have on increased care in the future, reliance on powered mobility devices and client's ability to engage in community participation and social interaction.

Will the wheelchair be appropriately secured when stowed in the vehicle?

This can be a tricky question to answer, particularly when a client dismantles their wheelchair to stow it in the vehicle. If the wheelchair is stowed on a roof hoist or other type of hoist, this is not a problem. An example of how to construct the wording for a client who stows their chair in the vehicle is as follows:

"Ms xxx will lean out of the car door to dismantle the wheelchair. She will then lift the wheels into the car and place them both behind the front passenger seat on the ground. She will place the cushion on the back seat. She will then lift the wheelchair frame into the car and place it on the front passenger seat. This frame will be firmly placed between the front dashboard and the front passenger seat. This method of stowing the wheelchair is the industry norm and considered the safest place to stow each part of the wheelchair in the car when there is no carer present to stow the wheelchair in the boot."

Generally, this has not been refused by NDIS.

Do you need to purchase the car before getting funding approved?

NDIS often will only approve the modification in 'principle' until a driving test has been passed and a vehicle purchased. In some cases, however, agreement can be reached for a variation of this requirement.

If purchasing a vehicle before funding approval will be problematic for your client, explain in the application that it is not reasonable to expect this in case approval is not granted, plus because the vehicle will depreciate significantly over the term of the approval process and wait time for the vehicle modifier's availability (6 - 12 months +).

One way to possibly achieve a faster approval when a new vehicle purchase is planned, is to provide a receipt of the deposit placed on the purchase of the new vehicle. Ensure that a clause is placed on the deposit receipt stating that the purchase is 'subject to NDIS approval of vehicle modifications' (to protect the client). Most car dealerships are accommodating and will have no problem with this. Issues may arise when the car has arrived and the modifications are not approved yet. Make sure to clarify how long the dealership will hold the car before finalising the sale.

Does the client need driving lessons? If so, how many?

The estimated number of driving lessons to pass the driving test will need to be quoted and applied for. This is another item that NDIS will fund within reasonable and necessary parameters.

A Specialised Driving Instructor (SDI) will be required in most instances. An SDI is a driving instructor with the added experience of working with people with disability. You may need to liaise with more than one instructor to find one who has the equipment you are recommending the client drives with.

Check out our <u>Specialised Driving Instructor page</u> for more information.

Don't forget any off-road assessment and training that may be required as well.

What do the client's existing
licence conditions (if any) stipulate?
Will the client need to be tested again by
Transport for NSW (or relevant State Motoring
Authority) with the new controls?

If your client has already been driving with modifications and the disability has progressed (or it is time for an upgrade), we recommend the following.

First, look at the current conditions held on your client's license at the State Motoring Authority. Find out what the conditions are, exactly as they are stated. The reason being some licences have more general, less specific wording than others.

When the wording around licence conditions is general, some hand controls may be changed without needing to redo an on-road driving test. An example would be, changing from mechanical push/pull to radial hand controls, as these require the same driving systems. If the type of vehicle modification is changed to something that does not match current conditions on the driver's licence, the driver may be required to undertake a Disability Driver Test. Either way, we would always recommend driving lessons when changing the type of controls used.

How will the client manage transport during installation time?

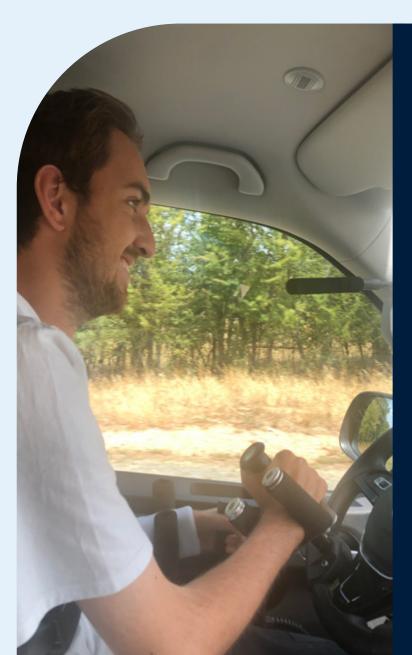
Plans for transport during the installation process need to be considered. Discuss how the client will access transport whilst the vehicle is being modified. This is particularly important when more complex modifications are required. The vehicle can take months to have all the components installed from various suppliers. Should the client consider looking at accessible vehicle hire, extra transport funding for taxis, or does the client have means to be able to manage for months without a vehicle?

Is there an installer close to the client's home?

If there is a local installer it can be very convenient for the client. If there isn't one close by, transportation of the vehicle to and from an installer will need to be factored into the overall costs of a funding application.

What after sales service is required? How often? How much?

Various products will have different servicing requirements that can add to the overall future maintenance costs. Factoring this into the client's future NDIS plans as part of the assistive technology budget is important. Be sure to advise your client to get servicing quotes from the installers for their next plan review.



Top Tip

- Talk to equipment suppliers, manufacturers, and licensed vehicle modifiers/certifiers for advice when needed. Most will be happy to help clarify anything that needs to go into the funding application.
- Without being over the top, estimate at the upper, rather than lower range for things like driving lessons, training and transport while waiting for modifications. These are more minor costs in the scheme of things but can stall the whole process if not adequately catered for.



6. Quotes and Evidence

Going through the list above, you would have noticed more than a few mentions of quotes.

The need for quotes for assistive technology (AT) is mainly determined by cost, risk level and the support item in question. The need for evidence tends to align closely with requirements for quotes, so we will discuss these together.

The NDIS classifies AT into 3 tiers of cost:

- Low Under \$1,500 per item
- Mid Between \$1,500 and \$15,000 per item
- High Over \$15,000 per item

They also classify AT as either low or high risk.

When it comes to vehicle modifications, all AT is considered high risk. This means that even for low and mid cost items, evidence is required. There is no set format for evidence, but it needs to include written advice (usually in the form of a letter/report) from a 'qualified AT advisor'. As a registered OT, you are a qualified AT advisor. For vehicle modifications that relate to the driver, the advising/assessing OT must be driver trained.

Itemised quotes are generally only required for high-cost modifications (covered in the next section), but if you can provide one for mid-cost items it is best practice. It is always recommended to check the <u>AT Code Guide</u> to determine whether a quote is needed for the item in question.

Changes made to mid-cost AT in early 2022 mean that *if the participant already has sufficient*Capital Supports (Assistive Technology) funding allocated in their plan, the high-risk evidence is usually all that is required to utilise funds for the purchase of assistive technology for vehicle modifications. Evidence must be submitted to the NDIS before funds will be released.

Where a plan does not already have sufficient funds, the participant will need to request them at their next plan review (generally once a year but can ask for earlier review). Providing your client written information regarding suitable AT (including cost/quotes) will greatly assist them in securing appropriate funding at a plan review.

Most vehicle modifications fall into the mid-cost category. While total cost of modification often exceeds \$15,000, remember - AT costs are classified **per item**. It is common to have vehicle modifications that cost, say, \$25,000 in total, but are still classified as mid-cost because no one item exceeded \$15,000.

Should I obtain quotes for items where it is not technically necessary?

This is a common question. While we can totally understand the desire to cut out unnecessary paperwork, our recommendation is that in general, obtaining a quote for most items, services and supports related to vehicle modifications is best practice.

The main reason comes back to our mantra of doing things right the first time. Even if a quote is not needed for funding approval, it is an ideal way of calculating a total budget for the cost of vehicle modifications.

Remember, if an NDIS client does not already have sufficient funds in their plan for AT, they will need to make a request at a plan review. At this review, funds will be allocated under Capital Supports to cover costs of the purchase, installation and maintenance of AT for vehicle modifications. Funding will also be allocated for assessment, training and any other input required in the process (i.e. driving lessons, instruction and training on new AT, etc.).

Having quotes for all items and supports needed for vehicle modifications makes it much easier to calculate a total budget required, ensuring that your client's plan can cover all costs involved.

There is some flexibility with how capital and therapeutic supports are used, but there is no flexibility in the total budget allocated. For example, if your client is \$5,000 short in their plan because some things got left out at the time of application, that means requesting another plan review and a possible delay of several months.

In the next section, we go through special considerations for high-cost vehicle modifications.





These are some of the most overlooked items in the budgeting process:

- · Transport of vehicle for fitment
- Driving lessons
- If the driving instructor's vehicle is required to attend a Disability Driving Test, ensure an additional 3 hours of instructor time
- Adequate allocation for ongoing maintenance
- Additional assessment, training and advice while learning to use new AT
- Accessory items to support the main modifications such as a support harness or indicator buttons

7. High-Cost Vehicle Modifications

When one or more items required for vehicle modifications cost over \$15,000, this is considered 'high-cost' assistive technology by the NDIS.

By and large, the application process for high-cost AT is the same as for mid-cost, but **at least one quote is always required**, and the application will be placed under greater scrutiny by the NDIS.

The assessment process for high-cost vehicle modifications can be quite involved. We recommend always checking how much funding is allocated under Capacity Building supports in your client's plan early on, as this is what covers the costs of assessments, trials, quotes, etc. If there are not sufficient funds, these will need to be requested at a plan review.

The NDIS will always require a quote for high-cost vehicle modifications, and they may request a second one to ensure value for money. If it is not possible/practical to provide a second quote, make sure to explain exactly why (e.g. only one supplier available). You may want to provide a second quote anyway if one can easily be obtained, as this will help strengthen the application.

The process outlined in this guide is sufficient to cover high-cost vehicle modifications. Our advice - make sure to pay attention to detail and approach the application from the perspective of providing a persuasive argument as to why your client needs the specific vehicle modification you are recommending. The NDIS will fund high-cost vehicle modifications, but to do so, need to be presented with clear advice as to why this is the best (if not only) solution available.

We can't cover every scenario involving high-cost vehicle modifications in this guide. But we will go through the most common - floor cut modifications.

Below are some important considerations when assessing and applying for a floor cut modification through the NDIS.

Measurements of client in their wheelchair.

The size of a wheelchair, and specifically a client's total height along with their eye height, is key in helping to work out the type of modification needed. These measurements may present a wide range of options or will limit what's available. Total weight of both the wheelchair and occupant may also play into this (due to lift and ramp restrictions).

Wheelchair specifications

- How big and heavy is the wheelchair?
- Will it affect entry options into the vehicle?
- Will the size and shape affect anything else, like controls, seatbelts, extra seating?
- Is there a suitable and approved dock option for the wheelchair being used?
- If self-drive from wheelchair is proposed, is the current wheelchair appropriate for this?
- Can the wheelchair manoeuvre to the docking position for either transfer or selfdrive from wheelchair?
- Does it have an appropriate turning circle for side access, reversing, or driving into the vehicle?



Mobility consideration

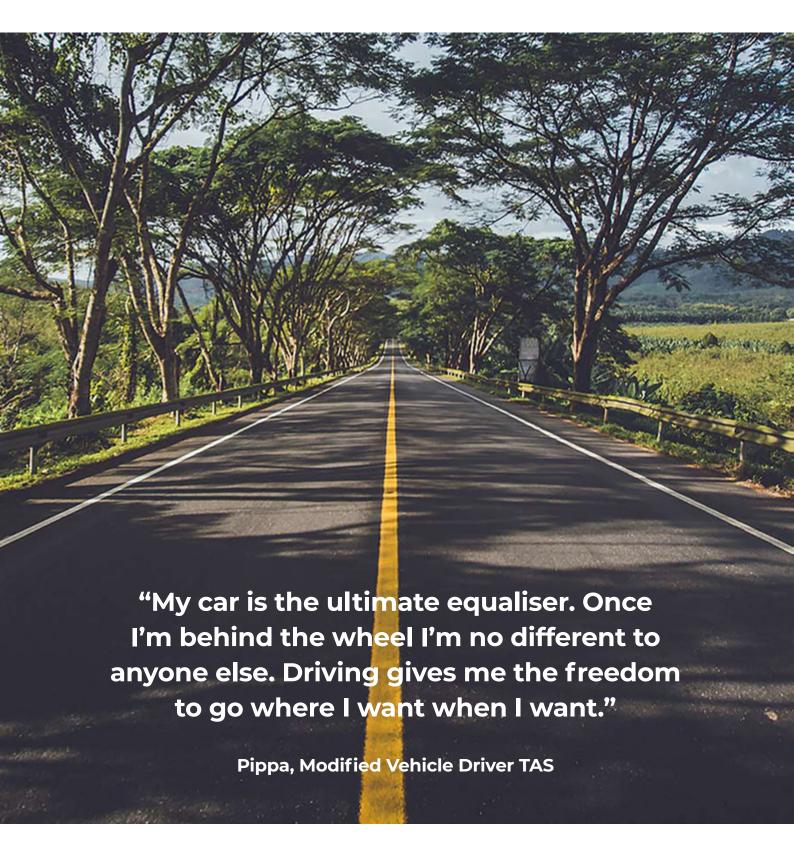
- Can the participant transfer, or will they need to drive from their wheelchair?
- If they can transfer, how?
- Do they have a degenerative condition which may affect the longevity of a transfer option?
- Would it be better to suggest drive from wheelchair straight away if transfer isn't a longterm solution?

Client's other requirements/goals

- How many other passengers need to be considered? Do any need child seats?
- What sort of equipment does the client need to consider daily?
- What do they want to achieve? Do any of these achievements affect how they will need to use the car?

Seating configuration

- What sort of seating do they need for other people?
- If the seating is folding to allow for access of the wheelchair, are the people who will be using these seats going to be able to fold it up and down themselves or will assistance be required?



8. Completing the NDIS Application

And now, we finally get to completing the application!

If you have gone through everything we have covered so far, this application shouldn't be as daunting as it might have been at first. But there's no getting around it, an application to the NDIS for vehicle modification requires A LOT of detail.

Our best advice is try to be patient and stick with it until you have all the information required. Trying to shortcut the application or leaving something out to clarify after it is submitted will most likely lead to unnecessary delays.

The NDIS does provide a Vehicle Modification Assessment Template. It is not mandatory to use this template, but any funding application must include all of the information specified on the template.

For what it's worth, our advice is to use the template unless you find it particularly difficult to work with. You want to make the job of the NDIS assessor as easy as possible and presenting the information in a familiar format will go some way to achieving this.

Before you get started, keep in mind that information provided needs to:

- Outline the functional impact of each feature being recommended.
- Describe how the AT will support capacity building, promote independence, and impact alternative forms of support.

We will briefly outline each section of the assessment template, with comments or tips where required.

The Assessment Form

Part 1 - Participant and Plan Management Details

Participant details and plan management details go here. (Name, NDIS number, DOB, etc.)



Part 2 - Evaluation / Assessment

Remember way back at the beginning when we suggested you write out that document with an overview of your client's situation? That should cover most of the first 3 points in this section - background, participant goals and functional assessment.

The form is quite instructive on what to include in each section. Read the prompt under each heading carefully and answer in as much detail as you can. Remember to attach reports or assessments where possible and ensure to refer to these in detail in relevant sections.

When listing the client's goals (as per their NDIS plan) make sure they align with what you are requesting for throughout this form.

A functional assessment is required, detailing the limitations from the client's disability that indicate the need for vehicle modification. Don't forget to list what is required additional to the vehicle modification, such as hoists, harnesses, prosthetics, driving lessons, etc.

You will need to describe your client's participation in work/study or community activities. Also, their current driving status and proposed use of the vehicle (as driver and/or passenger, or potential to drive in the future).

For clients who are asking for driving controls, evidence will be required of the client's current driving status. A copy of the client's driver's licence, driving assessment report and fitness to drive forms are also required, unless they will only be a passenger.

Confirm that assistive technology will fit in the proposed vehicle and outline if the predicted needs of the client are expected to change, plus anything else that might be relevant in your client's particular case.

Details of the vehicle being modified need to be supplied, including ownership of the vehicle (Certificate of Registration). If the vehicle being modified is not owned by the client, a letter must be provided by the owner of the vehicle accepting the modifications, as well as confirming the client's access to the vehicle. This letter must be attached to the application.

If the vehicle is older than 5 years and no longer under warranty, a vehicle condition report must be supplied to confirm it is safe and reliable, plus suitable to modify. These can be obtained from the State automobile club such as NRMA for NSW and can be funded through a client's Consumables budget in their plan.

If the vehicle has existing modifications, then an engineer report or other evidence must be supplied showing that the existing modifications are legal in the State the vehicle is registered.

Part 3 - Exploration of Options

In this section you need to list the alternative options considered to achieve the client's goals. Describe the functions and features, if they have been trialled previously, and why they are not considered suitable. Include the cost of the alternative product(s) including training.

Even if your focus to date has been on one particular option, perhaps because of limited alternatives or client preference, don't skip this section. It is vital for the NDIS to decide on whether the option being proposed represents the best value for money.

Note in this section you do not list the preferred option.



Part 4 - Recommendations

This section needs detailed explanation of the preferred option(s), why they are recommended and how they will assist the client to achieve their goals. Consider the long-term benefit and future needs of the client.

Present the alternative costs involved if this option is not approved. For example, if a driving control option is not approved for the client to get to work independently, present the yearly cost of taxi fares, additional support worker hours, or the personal toll of additional challenges with social and economic participation.

Quotes for the preferred option are required here. One quote for items \$15,000 or less and two quotes if items are above \$15,000. Please note: a single quote for work above \$15,000 may be authorised if it is not possible or feasible to provide two. If this applies, just make sure to point it out, explaining the reasons why.

Participant seating and safety questions will need to be answered. Also, if there are other factors that need to be resolved before implementing the modifications, such as behaviour support plans etc.

There may be some items that will not pass the Section 34 rules, so these will also need to be listed and NDIS advised if the participant is willing to pay them privately if not approved. These would usually relate to cosmetic or optional features, such as leather trim on an aftermarket seat, or optional paintwork during the installation process.

Acknowledgement of being able to pay for repairs and maintenance, registration and insurance (not covered by NDIS) must also be supplied.

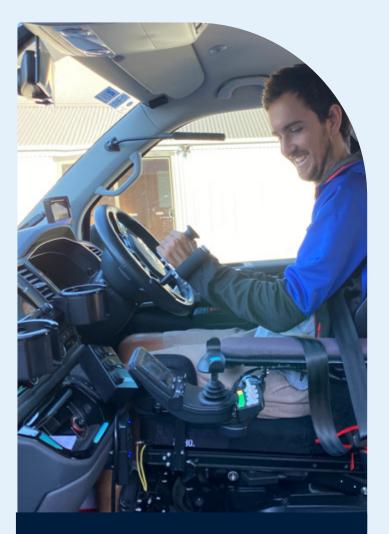
Part 5 - Details of Assistive Technology **Assessor**

In this section the assessor (usually OT or Driver Trained OT) will acknowledge declarations and provide their details along with the Vehicle Modifier (installer) details.

Part 6 - Consent to Collect and Share **Your Information - Provider AT Assessment** and Quotation(s)

This last section is for the client to complete and sign. It gives NDIS authority to access their information and have permission to contact the providers of assistive technology identified in the form.

Did you notice there are no instructions on where to send the form once completed? We did too! The form can be e-mailed to enquiries@ndis.gov.au. It is also recommended to give a copy to your client and their LAC (Local Area Coordinator), so they can monitor progress as well.





Top Tip

- We've said it before, but it warrants repeating. Don't be in a rush and don't send this form until it is 100% complete.
- Attach medical and allied health reports in chronological order to where they are mentioned in the form. Refer to each report by its title, e.g. 'Neurological Report from Dr John dated 15th May
- Take a copy of EVERYTHING before sending it. Forms do get lost, and you don't want to have to gather all the documents again.

9. After Lodgement...

Tips on following up

Expect a fair bit of a wait to get a response after submitting an application. It can take around 4 weeks to get any indication of where things are up to.

You can try calling the NDIS <u>enquiries</u> line but be aware they are fiercely protective of participants' privacy and probably won't tell you anything. Sending an e-mail to enquiries@ndis.gov.au (attaching a copy of signed consent to release information) would be our recommendation. Again, don't be surprised if they won't release any information.

Your best bet for follow up is to ask your client to contact the NDIS. They should be able to get an indication of where things are up to and may even be able to ask for the contact details of a staff member you can liaise with directly.

Client lessons

If you have followed our guide, allocation should be made in your client's plan for any driving lessons required. See if you can arrange lessons before the modifications are installed, by talking to a Specialised Driving Instructor (SDI). In many cases, an SDI can provide lessons in a car that is already modified in line with your client's requirements.

If you need a hand finding a Specialised Driving Instructor, <u>we are happy to help</u>.

In some cases, the outcome of an application will be 'approval in principle' or 'portion approval'.

Approval in principle

Sometimes, when there is still a bit of work to do in terms of purchasing a vehicle, sourcing components, or if vehicle modifications are particularly complex, the NDIS will provide 'approval in principle'. This essentially means that they are happy with the proposed option but need certain aspects to be more concrete before actually allocating funding.

Some clients actually prefer this approach. Knowing that the funding has been agreed to in principle gives some peace of mind to get started on the long list of things involved in obtaining vehicle modifications.

Portion approval

The most common scenario for portion approval is a client being allocated funding to obtain a licence and driving lessons first, before considering vehicle modifications. This might occur where there is uncertainty about the client's driving ability in general, which in turn could affect their long-term AT needs for operating a motor vehicle.

10. Checklists

There is A LOT to remember with an NDIS application for vehicle modifications.

To help keep you on track, we have created checklists for various stages of the application process. These can be used to track progress, as a final review, and just as a reminder that while this process is incredibly involved, there is an end in sight!

We will start with a general checklist, then an assessment checklist, post-assessment checklist, and finally, an application checklist.

General Checklist

Use this checklist any time you need to do a quick review of where an application is up to. It can be useful to see what step needs to be tackled next and to make sure no big parts of the process have been missed.

Client has obtained GP or specialist clearance to drive (not required if modifications are for client to travel as a passenger)

Provide client an assessment quote for approval to start the process

Perform an initial assessment - review medical profile

Summary of client's medical profile created (optional)

Check the client's plan goals align with their desire to drive

Check the client has funding for an OT assessment in CB supports budget

Work with Support Coordinator, LAC and planner to rectify funding if not currently available on the client's plan

Obtain a copy of the client's plan (if consent is given by the client)

Organise off-road Occupational Therapy driving assessment with client, conducted by a Driver Trained OT

Organise on-road Occupational Therapy driving assessment (by a Driver Trained OT) with client and specialised driving instructor fitted with a variety of vehicle modification options to try (is a high-level assessment van needed?)

Organise assessment with vehicle floor cut modifier (if required)

Obtain quotes

Complete application

Follow up with LAC and NDIS for approval

Assessment Checklist

A checklist to be used specifically at the assessment phase, where the focus is on identifying, trialling, and evaluating assistive technology options for vehicle modifications.

Establish current ability to drive

Assess functional capacity for driving – cognitive, visual and physical aspects

Shortlist relevant equipment that may be suitable

Organise an on-road assessment with a driving instructor

Organise vehicle floor cut assessment (if required)

Trial more than one product if possible

Establish client's preferences. Are they value for money?

Check that preferred equipment is customisable/adaptable for future needs

Check that the product can be transferred to a new vehicle in the future

Establish how the client will get into and out of the vehicle

Establish how the client will secure the wheelchair when stowed in the vehicle

Establish accessories or supporting products required - e.g. harness, elbow rests, indicator buttons etc.

Establish driving lessons required with the driving instructor

Take videos and photos as required

Post-Assessment Checklist

Once assessment is completed, use this checklist to make sure all essential points are covered.

Obtain quotes for all the components required and other options considered/trialled (NOTE: Before getting quotes ensure you have done a proof of concept of all relevant components)

Driving lessons

Hand Controls and related accessories/customisations chosen

Vehicle access requirements (including floor cuts, platform lifts, ramps etc.)

Wheelchair stowage products (if required, e.g. docking station, docking points (driver/passenger), roof hoist (measurements of car height and garage height), boot hoist)

Automation of controls – e.g. Apple Carplay, automate manual gear selector, electronic handbrake, auto tailgate, auto sliding doors etc.

Transport costs to get vehicle to installers and back for fitment

Transport costs for the client whilst without a vehicle and/or licence (rental/taxi)

After-installation service costs

Obtain reports/evidence to support your application

Medical reports

Vehicle condition/safety reports (if required)

Work/study/community activity reports to support the need for the vehicle modifications

Current driving status/conditions (if client already has a licence)

Vehicle purchase evidence (if required)

Vehicle registration documents

Engineer reports if vehicle already has modifications

Photos and videos from assessment day (or during the whole process)

Letter from registered vehicle owner approving proposed modifications (if applicable)

Application Checklist

A checklist specifically designed for completing the NDIS application form for vehicle modifications. (Current at time of printing)

Part 1

Client details, plan management details

Part 2

Include medical profile previously created

Client goals relevant to the application

Functional assessment results

Evidence – include relevant reports

Vehicle details and permissions (if applicable)

Part 3

Exploration of options – include information about options trialled or considered but not the recommended option

Part 4

Describe recommended options from client and assessor perspective

Include all extra accessories/ customisations, vehicle access items etc.

Attach quotes

Identify factors that need resolution or features that may not meet Section 34 criteria and be reasonable and necessary

Include information about repairs and maintenance

Part 5

AT assessor declaration and signature

Vehicle modifier details

Part 6

Participant consent to collect and share information

Send application to enquiries@ndis.gov.au and cc participant's LAC (Local Area Coordinator) so they can monitor its progress.





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