

10 February 2016

The Research Director  
Communities, Disability Services and Domestic Violence  
Prevention Committee  
Parliament House  
George Street  
BRISBANE QLD 4000

Dear Sir/Madam

**RE: Inquiry into a suitable model for the implementation of the National Injury Insurance Scheme (NIIS)**

Thank you for the opportunity for the Australian Physiotherapy Association (APA) to supply feedback on the affordability and fiscal sustainability of the NIIS model options.

Unfortunately due to time constraints the APA is unable to provide detailed comment on the comparative benefit of the two options supplied. We would however like to highlight several concerns.

- The report relies, substantially, on an actuarial valuation report for the NSW Lifetime Care and Support Authority by PriceWaterhouseCoopers. We understand the value of this, however, Australian models of care for people with serious injury generally underestimate the investment in physiotherapy (in hospital, community and home) needed to maintain the health and wellbeing of a person in the scheme. It is not clear therefore, that the modelling will have captured the 'rehabilitation' costs accurately. Although it is likely that a substantial investment in physiotherapy would be offset by reductions in hospital costs, it is likely that such a change would 'cost before it pays back'.
- Home modification and ongoing equipment costs appear to be in the tens of thousands. Our experience suggests that this will underestimate the costs of effective and substantial home modification; and it is unclear what would occur for people in tenancy arrangements. The models would benefit from consideration of a substantial, early payment such that people with profound injury could be assured of an ability to return to a safe home that maximises their independence and re-integration into the community.

- The care management costs appear to decline in later years. This is contrary to the practical experience of physiotherapists. A notable proportion of people who experience a catastrophic injury will have informal networks (e.g. family and friends) that can assist in care management. The incapacity of older parents who have played a pivotal role in care management is likely to lead to a heavy reliance on formal care management. The models would benefit from consideration of loading/increase in care management costs for the later years of life.

Please do not hesitate to contact Ms Jo-ann Lynn, Queensland Branch Co-ordinator at [REDACTED] if you have any questions.

We are keen to continue to participate and provide feedback throughout the development of the NIIS in Queensland.

Yours faithfully

[REDACTED]

Katrina Williams  
Queensland Branch President