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Acknowledgement

During the course of this Review we spoke to many people who are passionate about the value of the Scheme, whether for themselves, or for the people they care about.

In particular, we had the pleasure of meeting many people who use the Scheme, and the privilege of hearing their thoughts and experiences.

We were left in no doubt that the Total Mobility Scheme is absolutely essential to those people who rely on it.

The voices we have heard during the consultation process and from the submissions have made a significant contribution to our thinking, and to this final report. We thank them all.

Jan Mackay and
Lyndal Peters.

Definition of the Total Mobility Scheme¹: *essential, freedom, choice, access, life-line, independence, community, participation, opportunity, liberating, god-send, flexible, universal, fantastic, safety, comfort, valuable, vital, brilliant, empowering, awesome, mobility, wonderful, excellent, indispensable, enabling, paramount, equity, inclusive, necessary.*

¹Some of the words provided by people we met during the consultation process to describe what the Total Mobility Scheme meant to them.

APPENDICES

A number of appendices are attached directly attached to this paper. These are:

1. Tables: A. Characteristics of schemes by region and entitlement,
B. Characteristics of schemes by region and eligibility
2. Summary of Consultation Process
3. Consultation document: Summary Table
4. Analysis of Submissions (Executive Summary)
5. International issues and practice 2004 (Executive Summary)
6. Description of Total Mobility Schemes (Executive Summary)
7. Proposed policy framework
8. Summary of Statistics New Zealand Report
9. Nationally consistent maximum subsidised fare calculations
10. Recommendations and Costs
11. Continuum of Public Transport Services

The following full reports are available on request:

- International Issues and Practice 2004
- Consultation Document
- Analysis of Submissions
- Description of Total Mobility Schemes
- Statistics New Zealand data report
- NZ Travel Survey (1997/98) data, providing a basis for calculating nationally consistent maximum subsidised fares
- Financial modelling data report

Total Mobility Scheme Review

4 August 2005

1. INTRODUCTION

This report presents the findings of the Total Mobility Scheme Review, and makes recommendations for improvements to the Scheme. An overarching policy framework for the Total Mobility Scheme is presented, encompassing 35 recommendations.

The first section provides contextual background about the Total Mobility Scheme (the Scheme) and the Review. The second section provides an outline of the project, including the policy approach, work programme, and the process of identifying key issues and potential improvements. The third section outlines a proposed policy framework for the Scheme and makes recommendations relating to each of the six identified components of the Scheme (as outlined in the consultation document). The fourth section describes the funding and implementation issues associated with the proposed policy framework, and makes recommendations for increasing funding.

Collectively the information and recommendations contained in this report are expected to assist government to determine an appropriate increase in central government funding for the Scheme, based on its own decisions about desirable and affordable improvements. The decisions made by government should then provide the basis for subsequent negotiation between local government and Land Transport New Zealand (Land Transport NZ) to achieve desirable improvements.

2. BACKGROUND

The Scheme provides a transport service to people with disabilities by way of taxi vouchers to Scheme members that provide a 50% subsidy (in most regions) off a normal taxi fare. The Scheme also provides funding assistance for the purchase and installation of wheelchair hoists in taxi vans. There are approximately 43,000 registered members of the Scheme around the country (see Appendix 1). The Disabled Persons Assembly initiated the Scheme in the early 1980s, and effectively lobbied central government and local authorities to contribute funding to the Scheme as part of passenger transport services.

Local authorities contribute the greater share of funding and Land Transport NZ reimburses regional councils 40% of the costs of funding the Scheme and fitting new wheelchair hoists to taxi vans, and 60% of the costs of fitting taxi vans with replacement wheelchair hoists. During the 2004/05 financial year, Transfund New Zealand (now Land Transport NZ) allocated \$3.60 million and regional councils allocated an estimated \$5.40 million to the Scheme, totaling \$9.0 million.

The Scheme is discussed as a single entity throughout most of this report, although there are currently many variants of the Scheme operating throughout the country. Each variant is distinguished by specific town boundaries and the application of slightly different rules. These variants will be referred to as schemes (in the lower case) for the purposes of this paper. Fifteen local government authorities (usually regional councils) manage and operate at least one or more schemes (up to seven operated by Horizons, Manawatu/Wanganui), and collectively these total 32 schemes in 56 towns. Appendix 1 outlines the characteristics of each scheme with regard to eligibility and entitlement.

This current situation reflects the Scheme's origins as a community initiative that evolved to a local authority responsibility over time. It is the product of differing regional interpretations of the eligibility criteria, entitlement provisions, assessment procedures and administrative arrangements across the country. Local government funding levels have also varied. It is within this context that the Total Mobility Scheme Review has been undertaken.

A review of the Scheme commenced in 2002 as part of the Passenger Transport Social Services Review undertaken by Transfund New Zealand. The Review was extended into a second phase in September 2004 when the Minister of Transport agreed to new Terms of Reference "to identify options to improve the adequacy, consistency, portability, sustainability, and coverage of the Scheme". The Review was scheduled for completion by 5 August 2005 and this report outlines findings and recommendations.

3. PROJECT OVERVIEW

3.1 Policy Approach

The major focus of the Review has been to support and strengthen the policy foundation of the Scheme, as well as identify options for improving the services it provides. Early in the Review process it emerged that the policy basis for the Scheme was loosely formulated. Some local authorities were also unconvinced that the provision of the Scheme was an appropriate local government responsibility.²

While seeking to improve national consistency, it has also been important to endorse and support the pivotal role of local government in providing a regionally responsive service. Without the involvement of local government, the existence of the present-day Scheme would be threatened. Without an emphasis on national consistency, the Scheme delivers uneven service to a less than optimum proportion of its target group. The essential characteristics of both improved national consistency and regional responsiveness are incorporated in the proposed policy framework recommended in this report. However the success of any national framework will require negotiation with local government, increased central

² The views of local government were outlined to the Minister in an earlier briefing paper dated 2 June 2005 (WGTA5883).

government funding³, and the support and compliance of all local authorities, voluntary sector assessment agencies and transport operators. If this can be achieved, it will provide a stable platform upon which to build further improvement and extend the coverage of the Scheme.

Indisputably of course, it is also clear that any successful Scheme must have endorsement and support from those people for whom it is designed. Throughout the Review process, people who use the Scheme (along with other stakeholder groups) have voiced their concerns about the problems of the Scheme. However even more critically, they also made it clear that this is an essential service that provides independence, freedom and opportunity. For some, it is a 'life saver'⁴.

3.2 Work Programme

The Review work programme has focused on developing a profile of the current Scheme, identifying key issues, and identifying potential improvements. Significant outputs have included:

1. Pre-consultation meetings throughout the country with Total Mobility Scheme co-ordinators, local authority officials and some assessment agencies (see Appendix 2).
2. Development and release of the consultation document (see Appendix 3).
3. Management of the consultation and submission process, including:
 - Launching the consultation document at a meeting with national disability sector representatives, and at a meeting with officials from other government agencies (see Appendix 2).
 - Series of sixteen consultation meetings in six cities (see Appendix 2).
 - Analysis of over 400 submissions, approximately half of which were from people who use the Scheme (see Appendix 4).
4. Detailed analysis of possible improvements to the Scheme, including data collection on schemes, estimates of potential numbers of Scheme members, and financial costing of possible improvements (see Appendices 6, 8 & 10).
5. Review of international issues and practice 2004 (see Appendix 5).
6. Description of the Total Mobility Scheme (see Appendix 6).
7. Development of a proposed policy framework for the Scheme (see Appendix 7).

3.3 Data limitations

It should be noted that it has been particularly difficult to collect reliable and comparable data on the various schemes. Data was collected by way of postal questionnaires sent to each local authority, seeking information about the rules and characteristics of their scheme(s). Generally local authorities responded to these

³ Through an increased financial assistance rate by Land Transport NZ from the National Land Transport Fund.

⁴ This comment was made by a Scheme member at one of the consultation meetings.

questionnaires, but the extent to which they were able to provide the information varied. Often data was provided by way of estimates rather than hard data, and sometimes it was not available at all. This reflects the lack of systematic data collection by many local authorities. For those local authorities that did undertake more systematic data collection, the data sets available were not easily comparable.

Questionnaires were also sent to assessment agencies and taxi operators throughout the country. Local authorities provided the contact details for these organisations. Response rates however, were not high, and the quality of the information received varied.

Developing a profile about the people who use the Scheme (and how they use it) has also been problematic. It has been difficult to estimate the potential number of Scheme members under the existing, or any improved eligibility criteria. Although Statistics NZ was able to provide some data from the 2001 Disability Survey to assist develop informed estimates, it nonetheless was unable to fill all the information gaps (see Appendix 8).

Overall, this report is limited by available data with regard to: characteristics of the current schemes; the people who use the Scheme (and their travel behaviour and needs); and the potential number of people who could use the Scheme (whether under current or improved eligibility criteria). These limitations can be remedied in the future, and such remedies are included in the recommendations. However, for now, this report is largely reliant on indicative estimates, and it should be noted that the findings provided in this report are qualified accordingly.

3.4 Identifying key issues and potential improvements

Initial policy analysis identified six fundamental components of the Scheme, and the key issues associated with each component. This analysis was informed by the findings of an earlier survey by Transfund New Zealand.⁵ It was further informed and developed during a series of meetings with regional council transport managers and Scheme coordinators from around the country. These meetings provided an effective forum for clarifying the issues and identifying potential improvements. It was from this pre-consultative process, and the associated analysis, that the basis for the consultation document emerged. The document was organised around the six fundamental components, these being: Scheme purpose; eligibility; entitlement; assessment services; administration; and transport operators. It provided a brief description of each component, the issues, and possible improvements. It also posed a number of questions for submitters to consider.

The next sections of this paper provide a discussion of each component, including a description of the current policy context, key issues, and proposed improvements. Collectively these components form the bones of the proposed policy framework, and subsequent government decisions to implement

⁵ Transfund New Zealand *Total Mobility 2003*.

improvements to each or any one of them will establish the exact nature of the body. In this way, a policy framework for the Scheme, as agreed and sought by the government, can be established. With the endorsement of the government, it will also position the Scheme as a clear part of the core business of both local government and Land Transport NZ.

It should be noted at the outset however, that although one of the overall goals for the Review was to improve national consistency, this is not wholly achievable from the proposed recommendations, and regional differences will remain (within defined limits). Further, additional policy work will be required to translate the recommendations into an implementation plan and resolve any emerging issues. An outline of the proposed policy framework is attached as Appendix 7 to this paper, and summarises the following discussion in tabular form.

4. PROPOSED POLICY FRAMEWORK FOR THE TOTAL MOBILITY SCHEME

This section discusses each component separately, and the proposed recommendations relating to each component. It should be noted that although each recommendation will bring improvement to the Scheme, some recommendations are contingent on the implementation of others. Hence it is expected that improvements will be implemented progressively in stages. Even more fundamentally, the extent to which recommendations are accepted and implemented will be dependent on the extent to which government agrees to raise the Financial Assistance Rate (FAR) for the Scheme. There are financial costs associated with most recommendations, and these are outlined in section 5.

4.1 Scheme Purpose

4.1.1 Current policy context

The Scheme is founded on the central tenet that people with disabilities, unable to use buses, trains or ferries as a result of their disability, should be assisted with a subsidised alternative by local and central government. This tenet reflects the legislative requirement for local and central government to consider the needs of the transport disadvantaged⁶, and has since been further reinforced by the New Zealand Transport Strategy (2002). Consistent with this central tenet, provision of the Scheme is usually limited to urban areas that operate bus, train and/or ferry services, and taxi services. Further, the subsidised alternative provided by the Scheme has almost always been a taxi service, and therefore limited to areas that provide taxi services.

Transfund NZ described the current purpose statement in a report as follows:

“The goal of the Scheme is to increase the mobility of people with serious mobility constraints. The aims are to encourage participation in society and provide for

⁶ Land Transport Management Act 2003, Part 2, section 35.

personal independence, reduce pressure on caregivers, and allow people to continue living longer in their own homes if they prefer to do so.”⁷

4.1.2 Key issues

Currently there is a lack of agreed understanding as to the purpose and parameters of the Scheme, and the extent to which local authorities accept the purpose statement (as described above) is unclear. Even more fundamentally, some local authorities may not necessarily consider this is their core business, but rather a social service that is the more proper domain of central government. The establishment of an agreed Scheme purpose and boundaries, and clarification of management and funding responsibilities underpin the proposed policy framework for the Scheme.

An additional issue is the description of the target group for the Scheme. The current purpose statement (as above) describes the target group as ‘people with serious mobility constraints’. The current eligibility criteria describe the target group as ‘people with disabilities’. The former description is very wide and generalised, and the latter is inconsistent with the New Zealand Disability Strategy 2001 (NZDS). The NZDS states “Disability is not something individuals have. What individuals have are impairments. They may be physical, sensory, neurological, psychiatric, intellectual or other impairments” (p1).

The following recommended improvements establish a national purpose statement for the Scheme, including clarification of the central rationale and Scheme parameters. Collectively these recommendations improve the adequacy, consistency, sustainability and coverage of the Scheme (as shown on Appendix 7).

4.1.3 Recommended improvements

a) That the following Total Mobility Scheme purpose statement is nationally agreed and applied:

“The Total Mobility Scheme is to assist eligible people with impairments to access appropriate transport to enhance their community participation. This assistance is provided in the form of subsidised door-to-door transport services wherever Scheme transport providers operate.”

This statement is the same as the one proposed in the consultation document, except for the omission of the additional objective to “reduce social exclusion”. If this objective was included as part of the Scheme purpose, it may require a more complex assessment regime and bear fewer of the characteristics of a public transport service (and be less consistent with the central tenet of the Scheme) and be more akin to a social service.

The proposed purpose statement also defines the target group for the Scheme as people with impairments (rather than disabilities) who are prevented by their impairment from using buses, trains or ferries. The World Health Organisation (WHO) defines impairment as “any loss or abnormality of psychological,

⁷ Transfund NZ *Total Mobility 2003* p1.

physiological, or anatomical structure or function.” It also defines disability as “any restriction or lack (resulting from an impairment) of ability to perform an activity in the manner or within the range considered normal for a human being.”⁸ Both terms have applicability for establishing eligibility for the Scheme, in that to be eligible, a person must have an impairment, that prevents them from being able to use buses, trains, or ferries (the latter part of the sentence referring to the disability resulting from the impairment).

The proposed purpose statement in the consultation document was supported by 88% of the submissions received.

b) *That the founding central tenet of the Total Mobility Scheme, and the role of local authorities in providing the Scheme, is supported and strengthened.*

The provision of a subsidised transport service to eligible people with impairments is consistent with local government responsibilities to the transport disadvantaged, and part of core business⁹. The Scheme is primarily a transport service, and is no more a social, health or disability service than any other type of transport service. Any person would be at risk of social isolation and adverse health outcomes, if they did not have adequate access to appropriate transport. The Scheme provides its members with access to transport to participate in their communities in whatever way they choose. The destination they choose to travel to is their choice, and consistent with the way other people are able to use buses, trains or ferries.

However it is not intended that the Scheme should be a substitute for transport services that should more appropriately rest (or be shared) with other government agencies such as health, education or Accident Compensation Corporation (ACC). It seems appropriate that people who have a particularly high and frequent need to access specialist medical or other such services, should be eligible for additional transport assistance from these same services.¹⁰ Local authorities have expressed concern that unfair cost shifting does occur.

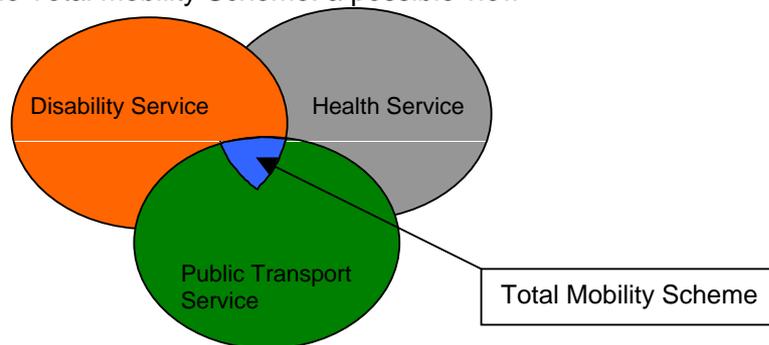
One way of conceptualising the respective responsibilities of agencies in providing subsidised transport is depicted in the diagram below. The diagram situates the Scheme as a component of public transport, and an appropriate local authority responsibility. The Scheme clearly has overlapping benefits to health and disability services (as well as education and others) as many people use the Scheme to access these services. However if the Scheme becomes monopolised by a particular trip purpose (or service area), such as getting to hospital, the Scheme purpose is potentially compromised (that being to assist community participation).

⁸ Cited from Statistics New Zealand *Disability Counts (2002)* p128. These definitions were applied by Statistics NZ for the NZ Disability Survey.

⁹ This is consistent with the *Land Transport Management Act 2003*, Part 2, section 35 and with the *NZ Transport Strategy (2002)*.

¹⁰ The intention is not to limit the extent to which people can use the Scheme for health services, but to encourage other agencies to consider, and where appropriate, assist meeting the transport needs of their clients.

Figure One: Situating the Total Mobility Scheme: a possible view



Overall the cumulative impact of such a trend could, arguably, move the Scheme away from being an appropriate local authority responsibility and towards that of another service. It could also threaten the current funding source for the Scheme, that being local authorities and the National Land Transport Fund. Issues regarding the appropriate scope (and funding source) of the Scheme, are likely to continue being contentious into the future, especially if local authorities perceive inappropriate cost shifting by other agencies. Improved data collection about the travel behaviour and travel needs of people who use the Scheme, will assist in monitoring trends in this area. This should also be the subject of future inter-sectoral work between government agencies and local authorities.

c) That the Total Mobility Scheme parameters are clearly defined.

This will clarify the limits of service provision within a finite budget. The latter will be discussed in a subsequent section on entitlement (see Section 4.3). With regard to the former, the following elements clarify the limits of service provision and are already consistent with common practice:

- Provision of subsidised transport assistance to people with impairments;
- Transport alternative to be provided by way of a subsidised door-to-door transport service;
- Limited amount of subsidised transport assistance available;
- Limited to areas where Total Mobility Scheme transport providers operate;
- Limited to local trips;
- Subject to nationally consistent eligibility criteria;
- Subject to some regional variation of entitlements to reflect local differences.

These elements will be preserved and strengthened as part of the proposed overall policy framework. Further elaboration on each of these elements will be discussed in the appropriate sections of this paper as indicated above.

4.2 Eligibility

4.2.1 Current policy context

There are nationally consistent eligibility criteria defining the target group that are applied by local authorities and assessment agencies:

“The Scheme is available to people who, because of physical, sensory, intellectual or psychological disability are unable to: proceed to the nearest bus stop/train

station; board, ride securely and alight; and proceed from the destination stop to the trip end without assistance”.

4.2.2 Key issues

The current eligibility criteria are reasonably robust and consistent with the Scheme rationale. However the current eligibility criteria are interpreted and applied differently between regions, and sometimes within regions by different assessment agencies. Further, particular groups of people might be accepted on the Scheme in some regions, but may be excluded in others. These four groups are:

- people who are able to use buses, trains or ferries some of the time, but not all of the time, due to the fluctuating nature of their impairment,
- people with short term impairments;
- children with impairments;
- people with impairments who live in residential care.

This variability in determining eligibility is inequitable, and reflects the lack of clarity about the purpose of the Scheme and the appropriate target groups. It also reflects the concern of local authorities to manage expenditure by limiting the number of people accepted on to the Scheme. Underlying all these issues appears to be a perception by local authorities that the number of eligible members may potentially be much higher, posing a threat to the viability of the Scheme financially and administratively.

This concern is validated in estimates provided by Statistics NZ. While approximately 43,000¹¹ people are registered members of the Scheme, it is estimated that 78,300 people could be eligible.¹² The number could be even higher if children or people who live in residential care are also included.¹³ Other information suggests that up to 5,400 children¹⁴ and 20,000 people in residential care¹⁵ may potentially also meet current eligibility criteria. However relatively small numbers of current Scheme members are children or live in residential care.¹⁶ It should also be noted that most Scheme members appear more likely to be amongst the older age groups with at least half (and probably many more) aged over 75 years.¹⁷ This trend will be further magnified in the future by demographic growth in older age groups.¹⁸

¹¹ See Table B, Appendix 1.

¹² See Summary of Statistics New Zealand Report (Appendix 8).

¹³ This estimate does not include children and people who live in rest homes as the Household Disability Survey 2001 did not collect this data. See Summary of Statistics New Zealand Report (Appendix 8).

¹⁴ Ministry of Education advises it currently assists approximately 5,400 children with school travel as a result of their impairments (July 2005).

¹⁵ The Ministry of Health estimates that approximately 12,000 people aged over 65 are living in rest homes, and that 8,000 people aged under 65 years are living in residential care.

¹⁶ Description of Total Mobility Schemes (Appendix 6).

¹⁷ Estimated from data provided from local authorities, and information contained in the Transfund *Total Mobility 2003* pp53-54.

¹⁸ Refer Table A, Summary of Statistics New Zealand Report (Appendix 8).

It is unclear why eligible people do not join the Scheme. For some it will be an active choice, while for others it will be the result of specific barriers. This group is likely to include those that:

- live in areas that do not operate a Scheme (barrier);
- do not know about the Scheme (barrier);
- have (or would) apply to be members, but are declined¹⁹ (barrier);
- are not able to afford to pay 50% of the taxi fare (barrier);
- travel with others, or have their own private vehicles (choice);
- pay for their own travel costs (choice);
- do not travel.

Another significant issue, (included in the list above) is the ineligibility of people with impairments, who live in areas that do not have bus, train or ferry services. This effectively prevents otherwise eligible people from using the Scheme, when they are travelling within areas that do operate this service. For instance, when they are on holiday or conducting business outside their area of residence. Extending coverage to this group could increase the number of eligible Scheme members by an estimated 29,600.²⁰ It is unlikely however that this group will be frequent members of the Scheme, as their use will be limited to areas where the Scheme is available.

This group also includes those who may live on the outside fringes of urban areas that do provide bus, train or ferry services (including a Total Mobility Scheme). However this group is currently excluded because their area is not subject to a passenger transport component in their local authority rates.²¹ For this latter group, it has been an issue of contention that they are not eligible to use the Scheme (because public transport is not a component of their rates) even though taxis operate in their area.

The following recommended improvements focus on improving the eligibility criteria and supporting its consistent application across the country. These may address two of the potential barriers identified in this discussion, and are also likely to increase the number of registered Scheme members. Collectively these recommendations improve the consistency, coverage and portability of the Scheme (see Appendix 7).

4.2.3 Recommended improvements

d) That the following Total Mobility Scheme eligibility criteria are nationally agreed and applied:

“An eligible person must have an impairment that prevents them from undertaking any one or more of the following five components of a journey unaccompanied, on a bus, train or ferry in a safe and dignified manner:

¹⁹ This includes those people who may have been declined, due to narrow interpretation of the eligibility criteria by one local authority or assessment agency, but may have been accepted as eligible by another.

²⁰ Summary of Statistics New Zealand Report (Appendix 8).

²¹ At least three local authorities only provide the Scheme in specific areas that are rated for public transport services.

- *Getting to the place from where the transport departs*
- *Getting on to the transport*
- *Riding securely*
- *Getting off the transport*
- *Getting to the destination.”*

These proposed criteria are similar to the current criteria, although more clearly outline the necessary elements of an ‘accessible journey’, to assist determine eligibility. This is consistent with the approach outlined by the Human Rights Commission, which describes the accessible journey as follows:

“...this means that for a person to get from their home to a destination and then home again requires a number of linked steps. All these steps are of equal importance. If one link is broken or inadequate, the whole journey becomes impractical.”²²

This proposed improvement was supported by nearly 90% of submissions received.

e) That people with impairments who meet the criteria for the Total Mobility Scheme, and are able to use bus, train or ferry services some of the time, but not all of the time, should be eligible for the Scheme.

It is not known how many people are in this category, although some local authorities allow this group to be members of the Scheme, and others do not. Examples of people in this category include people with impairments that may fluctuate and become more acute for periods of time (such as epilepsy or arthritis), hence their need to use the Scheme at these times. It may also include people with impairments (such as alzheimer’s) that only allow them to travel, using buses, trains or ferries on very familiar routes, or people with visual impairments that only allow them to travel during day light hours.

This proposed improvement was supported by 86% of submissions.

*f) That people who meet the criteria for the Total Mobility Scheme and have an impairment that has lasted or is expected to last for six months or more should be eligible for the Scheme.*²³

Currently some people who have impairments that are defined as short-term by local authorities are accepted as members of the Scheme. In other areas, they may not be accepted.²⁴ However local authorities (and assessment agencies) define ‘short-term’ in different ways. In at least one region short-term is defined as a disability with duration of not less than one year, while in others it may be defined as a much shorter period. Data collected from local authorities suggested that the

²² Human Rights Commission *Inquiry into Accessible Public Land Transport Consultation Report* April 2004 p23.

²³ Excluding people with terminal illnesses.

²⁴ At least four local authorities do not accept people with short-term impairments on their Schemes. However their respective definitions of short-term vary.

number of Scheme members who were classified as short-term were approximately 500 nationally.

Rather than defining 'short-term impairment', this recommendation proposes adding a concept of time to the proposed eligibility criteria. Consistent with definition used by the Ministry of Health²⁵, Statistics NZ added a concept of time to the WHO definition of disability for the purposes of the NZ Disability Survey. That is, that the disability must have lasted or be expected to last for six months or more.²⁶ It is recommended that this same time duration requirement be incorporated in the eligibility criteria for the Scheme to provide consistency with their interpretation.

In addition, it should also be noted that accepting people with impairments of an expected duration of less than six months on to the Scheme, may exacerbate financial pressures on the Scheme, and potentially risk reduced entitlements for people with longer term or permanent impairments.

This proposed improvement was supported by 85% of submissions (however the term 'short-term' was never defined). Some local authorities expressed concern about the additional costs of including people with short-term impairments.

g) That children with impairments who meet the criteria for the Total Mobility Scheme should be eligible for the Scheme.

Children are accepted as members of the Scheme in most, but not all regions, and number fewer than 250.²⁷ It is recommended that the Scheme should be available to children to support their independent participation in the community, in ways that are similar to other children in their peer group who do not have impairments. This could include trips to visit friends, or to see a movie.

It is not intended that the Scheme should be a substitute for transport services that are the responsibility of other government agencies, such as the Ministry of Education which is responsible for all school related travel. To provide an indication of the potential numbers of children who could use the Scheme, currently the Ministry of Education provides special transport assistance to 5,400 children who have impairments.²⁸

This proposed improvement was supported by 75% of submissions.

h) That people with impairments who meet the criteria for the Total Mobility Scheme and live in residential care should be eligible for the Scheme.

²⁵ The Ministry Health advised that it introduced the six months threshold in their definition of disability in 1994. Source: Ministry of Health.

²⁶ Statistics New Zealand Disability Counts (2002) p128

²⁷ At least two local authorities do not accept children on the Scheme. For the 13 local authorities that do accept children on the Scheme, only seven could provide actual numbers, giving an estimated total of 250 children. However age definition for a 'child' varied between them.

²⁸ Figure provided by the Ministry of Education

Most local authorities seem to accept people in living in residential care on the Scheme, although numbers are likely to be small.²⁹ However it appears that people living in rest homes have not always been accepted on the Scheme due to the perception that the travel needs of this group should be, or are being, met by rest home providers. However the Ministry of Health advises that rest home providers only have responsibility to meet the cost of transport for stipulated health services.

It is expected that the Scheme should be available to people who live in rest homes to support their independent participation in the community. This may be to visit friends or families, or go shopping. It is not intended that the Scheme should be a substitute for transport services that are the responsibility of the rest home provider, or be used by the rest home to provide transport for organised activities.

This proposed improvement was supported by 85% of submissions.

- i) *That people with impairments who meet the criteria for the Total Mobility Scheme, and who live in areas that do not have bus, train or ferry services should be eligible for the Scheme, enabling them to use the Scheme wherever it operates.*

This group encompasses people who live in areas that *do not* operate bus, train, or ferry services, taxi services or a Total Mobility Scheme. Including this group in the Scheme, will allow them to use the Scheme wherever it operates (even if it does not operate in their local area).³⁰ For those people who live on the outside fringes of areas that do provide the Scheme, it is expected that where possible, this group should have access to the Scheme (even though they are not subject to the public transport rating component). As this issue is region specific, it is expected that the inclusion of this group should be a subject for negotiation between the relevant local authority and Land Transport NZ.

This proposed improvement was supported by 92% of submissions, however local authorities expressed concern about the additional costs of including this group of people.

4.3 Entitlement

4.3.1 Current policy context

The entitlement provided by the Scheme is subsidised transport, usually provided by taxi operators. It is important that the cost of this transport is financially affordable and sustainable for local authorities and Land Transport NZ. The Scheme is a relatively high cost service, and local authorities adjust and limit entitlement through various mechanisms to ensure the Scheme operates within budget. These mechanisms include:

²⁹ At least one local authority does not accept people living in rest homes on the Scheme. For the 11 local authorities that do accept people living in residential care, only five could provide actual numbers, giving an estimated total of approximately 3000 people.

³⁰ These people will be able to use the Scheme when they travel to areas that do operate the Scheme.

- establishing a fare subsidy (usually 50%);
- setting a minimum fare threshold;
- setting maximum subsidised fares;
- limiting trips (by way of voucher allocation and/or trip purpose);
- prohibiting travel outside town boundaries.

Local authorities may use all or some of these mechanisms, and this is reflected in varying rules relating to entitlement around the country. Scheme use is further limited by the lack of advertising of the Scheme (this is discussed further in section 4.5).

4.3.2 Key issues

The key issues relate to regional variability in the rules associated with the provision of the transport service with regard to the five areas outlined above (Section 4.3.1). These rules restrain the level of use of the Scheme by members, and largely function to manage local authority budgets.

Little is known about the travel behaviour of current Scheme members and the extent to which the level of entitlements provided are adequate to meet their needs. Data provided by local authorities indicate that the monthly average number of trips taken by Scheme members is low, and in many regions, it may be as low as two trips a month.³¹ This suggests that overall most Scheme members are very low users of the Scheme, and that there is a minority group of high users.

The reasons for low use (or high use) are unclear. They will however reflect local Scheme rules, and be heavily influenced by the cost of a taxi fare. Many Scheme members are likely to have low incomes, and will limit their own use of the Scheme accordingly.³² Some may not use it at all, as even with a 50% fare subsidy the costs may be prohibitive. Similarly, it is likely that many potentially eligible Scheme members may not apply to join the Scheme due to the cost of taxi fares.

Increasing the fare subsidy would increase the affordability of the Scheme for current members and may reduce financial barriers for potential members. However at this time the Ministry of Transport does not have data to estimate the extent to which the fare subsidy would need to be raised to bring it into a more affordable range for the latter group, nor the extent to which it would increase demand for the Scheme.

The following recommended improvements focus on improving the rules to increase the adequacy and over-riding purpose of the Scheme. It is expected that some rules can be nationally consistent (such as fare subsidy) while others will differ to take account of local topography, population and travel patterns and costs (such as maximum subsidised fares). However even with regard to the latter,

³¹ Data obtained from local authorities indicates the average number of trips taken per person per month on the Total Mobility Scheme ranges from a high of 5.9 trips to a low of 1.17 trips.

³² The Transfund NZ *Total Mobility 2003* report (p56) noted that for those people who participated in its survey, 84% earned less than \$20,000 per annum, and 38% earned \$10,000 or less. The NZ Disability Survey *Disability Counts* (2001) found that the personal incomes of adults with disabilities are lower than those without disabilities (p17).

decision-making can be based on a nationally consistent transparent method. Currently there is no such method.

Collectively these recommendations improve the adequacy, consistency, and sustainability and coverage of the Scheme (as shown on Appendix 7).

4.3.3 Recommended improvements

j) That the fare subsidy for the Total Mobility Scheme should be nationally consistent and standardised at 50%.

With regard to fare subsidy most local authorities provide a 50% fare subsidy, although in the recent past one or two have reduced it to a lower level near the end of the year to manage their budgets. For this reason it is recommended that it be fixed at a 50% minimum.

This proposed improvement was supported by 89% of the submissions. However as already noted, this subsidy level may be too low for some. Raising the fare subsidy to a higher level should be considered in the future.

k) That the Total Mobility Scheme has no minimum fare threshold.

Some regions require a minimum fare threshold before the subsidy is applicable. For instance, if a fare threshold were \$5 the subsidy would only apply after the fare had reached this amount. This requirement penalises Scheme members who only ever need to make short trips in these regions and are therefore ineligible to receive a subsidised fare.

This proposed improvement was supported by 55% of submissions. Thirteen out of the fourteen local authorities that responded to this question, supported this proposed improvement. Transport operators were evenly divided in their views.

l) That local authorities determine maximum subsidised fares for the Total Mobility Scheme in negotiation with Land Transport NZ, taking into account the NZ Travel Survey, and review them annually.

Maximum subsidised fares are set by all but one local authority, and vary accordingly. There does not appear to be any consistent method for determining the maximum subsidised fare. However in order to reflect the proposed purpose of the Scheme, it is important that the maximum subsidised fare is established at a level that is adequate and appropriate for any town or region operating the Scheme.

A useful tool for providing guidance is the NZ Travel Survey. It provides average trip distances undertaken by householders for local trips, in specific towns and regions. It is recommended that maximum subsidised fares should be determined taking this data into account. Maximum subsidised fares could be determined within a range between the 75th and 95th percentile of trip distance averages for the region. These calculations are provided in Appendix 9.

The final determination of the maximum subsidised fare should be negotiated between the local authority and Land Transport NZ, taking into account other relevant factors such as local topography, population and budgets. Further, this figure should be reviewed annually to take account of changes in the CPI, and any new information provided by the NZ Travel Survey.³³

Almost 80% of all submissions, and 50% of those from local authorities, supported a nationally consistent method for determining maximum subsidised fares.

m) That town boundary travel restrictions for the Total Mobility Scheme be removed and replaced with a maximum subsidised fare.

Most Schemes do not allow subsidised trips to be taken outside the town boundaries. To some extent this is reasonable and consistent with the proposed Scheme purpose, which limits subsidised travel to local trips. However this rule is unfair for people who live just beyond town boundaries, or need to travel to a destination just beyond town boundaries. It also prevents travel to nearby towns where distances are very small, but where many key services and activities may be located. This is a particular issue for small provincial or country towns. Accordingly it is recommended that town boundary travel restrictions should be removed, and that subsidised travel be limited by the maximum subsidised fare.

n) That the number of allocated subsidised trips for the Total Mobility Scheme take into account the self-assessed needs of individual Scheme members, and be adjusted by local authorities to manage their budgets, and negotiated with Land Transport NZ.

This approach is not entirely inconsistent with the current practice of some local authorities. However it will also be important to ensure the level of trip allocation is adequate to reflect the Scheme purpose, and is reasonably consistent with the allocation level provided in other regions. To ensure this, the local level of trip allocation should be subject to negotiation with Land Transport NZ, and monitored.

Through this mechanism the Scheme can be responsive to different levels of need for subsidised trips (e.g. occasional, weekly or daily) rather than the allocation of a fixed amount at fixed intervals. Further, this is an important mechanism for local authorities to control the budget and constrain spending.

Invercargill City Council successfully uses this mechanism to manage its Scheme budget. It uses a guided self-assessment process³⁴ to nominate the (realistic) amount of subsidised trips required, and calculates the extent to which its allocated budget can meet this demand. If it cannot, it will reduce every member's allocation by the same percentage to stay within budget, and inform members of their allocation.³⁵ More information about the Southland (Invercargill) Scheme is provided in Appendix 6.

³³ The Ministry of Transport plans to conduct this survey annually.

³⁴ On the same basis, a guided self assessment method for determining the required amount of subsidised travel is one of the recommendations and is discussed further in the assessment section of this paper.

³⁵ Currently (2004/5) it is providing members with 93% of their requested allocation.

The extent to which this specific method can be successfully applied to all Schemes has not been tested, however it is a promising approach and could be used as a basis upon which individual local authorities and Land Transport NZ could negotiate a locally appropriate variant of this method.

The proposed improvement to develop a nationally consistent method for determining the number of vouchers allocated to each person was supported by 51% of submissions. Seven of the fourteen local authorities that responded to this proposal, supported a national method for allocating trips. Some noted the importance of this mechanism for budgetary control.

o) That there are no restrictions on the purpose of the trip for the Total Mobility Scheme.

In some regions allocated trips may be limited to specific trip purposes. This prevents Scheme members from deciding on the types of trips for which they will use their vouchers. This is inconsistent with the proposed purpose and central tenet of the Scheme that is concerned with providing access to subsidised transport, rather than prescribing appropriate or inappropriate destinations. However it is not intended that the Scheme should be a substitute for transport services that should more appropriately be the responsibility of other government agencies, such as those in the health sector or ACC.

This proposed improvement was supported by 80% of submissions.

4.4 Assessment services

4.4.1 Current policy context

Assessment of eligibility for the Total Mobility Scheme is most commonly undertaken by voluntary agencies in the disability sector. Often there are a number of agencies in a region providing assessments, covering a broad range of impairment types.³⁶ The involvement of the voluntary sector in providing assessment services has been a characteristic of the Scheme since its inception. In some regions general practitioners³⁷ and/or professional assessors may be contracted by the local authority to provide assessments. This may be instead of or in conjunction with, assessments by voluntary agencies. At the other end of the spectrum, there is one local authority that provides for self-assessment of eligibility by potential Scheme members, if it is accompanied with an endorsement by an appropriate voluntary sector disability agency.

The Scheme is dependent on the provision of free or low cost assessment services. Most local authorities do not pay voluntary sector assessment agencies for these services, nor do they have formal contracts for assessment services with agencies.³⁸ Accordingly, many agencies seek a financial contribution for their

³⁶ These agencies include IHC, CCS, Royal NZ Foundation of the Blind, Age Concern and others.

³⁷ At least three local authorities only use general practitioners to provide assessment services for the Scheme.

³⁸ At least three local authorities have contracts with agencies

assessment services directly from the potential Scheme members. An agency may require potential Scheme members to join and pay annual membership fees, or alternatively require payment of an assessment fee. Some agencies require both a membership fee and an assessment fee. For some Scheme members the agency membership requirement may be quite acceptable, and provide them with access to other useful services provided by the agency.

4.4.2 Key issues

The key issues primarily relate to the inconsistent application of the eligibility criteria between regions, and the lack of clear accountability arrangements between local authorities and voluntary sector assessment agencies. The Scheme can also create potentially high workloads for assessment agencies, with little or no financial recompense. For some Scheme members the requirement that they must join an agency and pay an associated membership fee is undesirable.

In regions that only engage general practitioners to provide assessments, this may create a cost barrier for some potential Scheme members. It may also be unacceptable to some members of the disability sector who do not consider disability should be viewed as a medical condition.

The following recommended improvements focus on supporting the consistent application of the eligibility criteria by assessment agencies, and implementing arrangements to improve accountability between assessment agencies and local authorities. They also clarify the relationships (financial and membership) between applicants and assessment agencies. Collectively these recommendations improve the adequacy, consistency and sustainability (see Appendix 7).

4.4.3 Recommended improvements

- p) That Land Transport NZ develop guidelines for contracts between local authorities and assessment agencies to ensure high quality and consistent assessments.*
- q) That local authorities enter into contracts with assessment agencies, aligned with the guidelines produced by Land Transport NZ.*

These recommendations will improve consistency in the application of the eligibility criteria and support the provision of high quality assessment services. They also provide accountability between assessment agencies and local authorities. Other recommendations in this report support these assessment agencies with the provision of information (handbook), training and some funding (recommendations r, s, t, v).

These recommendations were not included in the consultation document.

- r) That local authorities should make a financial contribution towards the cost of assessments and administration undertaken by assessment agencies.*

While it is recommended that local authorities should make a contribution towards the costs of assessment services, it is not expected that it will necessarily cover

the full cost. It is anticipated the costs would also be shared between the potential Scheme member as well as the voluntary agency. With regard to the latter, this is consistent with the founding tenet of the Scheme, which involves voluntary sector, local authority and central government co-operation. Further, it is not expected that the assessment process should be complex and require professional expertise, and hence create additional associated costs.

This proposed improvement was supported by 58% of all submissions and 63% of assessment agency submissions. However eight of the 14 local authorities that expressed a view on this proposal, were not supportive.

s) That appropriate training is provided to assessors to assist in the consistent application of the eligibility criteria.

This recommendation is in conjunction with the provision of a handbook (recommendation t). It is anticipated that training seminars may need to be repeated from time-to-time as necessary, to meet the needs of new assessors in a region.

This proposed improvement was supported by 75% of all submissions, and 77% of assessment agency submissions.

t) That a handbook, including best practice guidelines, be developed and published by Land Transport NZ in conjunction with local authorities, to help assessors in consistently applying the eligibility criteria.

It is recognised that volunteers, who may have a varying range of experience and knowledge about the eligibility criteria for the Scheme, frequently undertake the assessments. Currently there is scope to interpret the criteria and apply them in different ways, and this potential continues to exist (although to a lesser extent) under the revised criteria. A handbook will provide more detailed information to assist consistent interpretation of the criteria, and provide examples, particularly with regard to potential 'grey' areas. This handbook could be updated from time-to-time to reflect any future emerging areas of inconsistent interpretation.

It should also provide guidance about conducting a safe, high quality and confidential assessment. It is expected that for most applicants, the assessment process should be uncomplicated, relatively short and focused only on collecting the minimal information necessary for establishing eligibility. The guidelines would also help assessors identify if a more specialist assessment was required, and when it would be appropriate to seek expert advice.

This proposed improvement was supported by 87% of all submissions, and 91% of assessment agency submissions.

u) That the assessment process assists Total Mobility Scheme members estimate how many trips they would use (self assessed needs). This information will be provided to local authorities to assist them determine the appropriate number of allocated subsidised trips.

Scheme members will all vary with regard to the number of subsidised trips they need and can afford to use (given they pay 50% of the fare themselves). Accordingly, it is recommended that the number of trips allocated should be based on an applicant's own assessment of what is needed (whether occasional, weekly or daily trips) rather than the allocation of a fixed amount at fixed intervals. Guidance for the assessor and applicant to help applicants calculate how many subsidised trips they need and are likely to use over a given period, could be provided in the handbook (recommendation t). This information should assist local authorities allocate an appropriate level of subsidised trips to Scheme members (see recommendation n).

This recommendation was not included in the consultation document.

v) That potential members of the Total Mobility Scheme are not required to become financial members of an assessment agency in order to have an assessment for the Scheme, although they may be asked to pay an application fee. The appropriate amount of any such fee should be negotiated between Land Transport NZ, local authorities and assessment agencies.

The requirement by some assessment agencies for potential Scheme members to join and pay annual membership fees raises legal issues. Such a requirement may be inconsistent with the right to freedom of association under section 17 of the New Zealand Bill of Rights Act 1990.

The right to freedom of association encompasses the right *not to* associate with others. A person's decision to join or refrain from joining an organisation should be free from any form of compulsion, coercion, incentives or disincentives that remove the exercise of choice. Requiring potential Scheme members to join the assessment agency in order to gain entry to the Scheme effectively removes their exercise of choice as to whether to join the organisation.

The proposal that people who use the Scheme should not have to join an agency was supported 63% of all submissions, and 57% of assessment agency submissions.

w) That potential members of the Scheme have the option to be assessed by a voluntary disability sector agency in every region.

It seems important that potential Scheme members have access to at least one relatively low cost (or no cost) assessment agency in their region. Voluntary disability sector agencies play an important role in supporting the Scheme by providing low or no-cost assessment services.³⁹ It is recommended that this co-operation between the voluntary sector, local government and central government be supported.

This recommendation was not included in the consultation document.

³⁹ Note that some agencies may require a membership and/or assessment fee from potential Scheme members.

4.5 Administration

4.5.1 Current policy context

Administration of the Scheme is primarily the responsibility of local authorities, but is sometimes delegated to voluntary assessment agencies. Both the way and extent to which responsibilities are allocated between the two parties varies considerably between regions. Most local authorities and agencies use administrative systems that are labour intensive relying on paper-based systems to allocate vouchers, collect information and monitor use. While some local authorities do have a computerised database, their capabilities differ and do not tend to generate data sets that are easily comparable.⁴⁰

4.5.2 Key issues

The lack of data collection, monitoring and evaluation of the Scheme is problematic. The variability in the current capabilities of local authorities to collect information, as well as the region specific way in which data is collected, makes it difficult to provide a national profile of the Scheme. Further, little information is collected about the travel patterns and needs of Scheme members, and the extent to which travel needs are met by the Scheme.

Scheme members can have difficulties redeeming vouchers when they travel to other regions. Each region allocates its own vouchers, and some accept vouchers from other regions, while others do not.⁴¹

Many people who are potentially eligible for the Scheme are not aware of it, as the Scheme is not promoted in most regions.⁴² As noted in an earlier section, this reflects a perception by local authorities that the number of eligible members may potentially be very high, posing a threat to the viability of the Scheme financially and administratively.

The following recommended improvements focus on improving administrative systems and Scheme promotion. Collectively these recommendations improve the adequacy, consistency, portability and sustainability. (see Appendix 7)

4.5.3 Recommended improvements

x) *That Land Transport NZ encourages local authorities to establish systems for data collection, monitoring and evaluation.*

The systematic collection of regional and nationally comparable data is an essential component of any successful Scheme. It will enable the effectiveness of the Scheme to be monitored and regularly evaluated.

This recommendation was not included in the consultation document.

⁴⁰ At least three local authorities have databases, and one has smart card capability which provides for easier data collection.

⁴¹ At least two local authorities do not accept vouchers from other regions.

⁴² At least two local authorities undertake targeted promotion of the Scheme.

y) *That Land Transport NZ encourages local authorities to improve their administrative systems for the allocation and redemption of trip entitlement vouchers.*

This recommendation was not included in the consultation document. However 88% of respondents supported the development of an administration system that could be used by all local authorities.

z) *That local authorities implement appropriate methods to promote the Total Mobility Scheme. This should be phased in following the implementation of other improvements to the Scheme.*

People who meet, or are likely to meet the eligibility criteria for the Scheme should be made aware of the Scheme and its potential benefits. Awareness can be increased by the provision of appropriate and accessible information to those most likely to benefit.

This proposed improvement was supported by 81% of all submissions. Nine of fourteen local authorities that responded to this proposal agreed with it. Most local authorities in favour of promoting the Scheme also expressed concerns that increased publicity could overwhelm councils and agencies with enquiries, assessments and increased demand for services. They all recommended promotion be targeted towards groups that are likely to be eligible.

4.6 Transport operators

4.6.1 Current policy context

Since its inception, the operation of the Scheme has depended on the availability of taxi services, and accordingly, has been limited to areas where these operate. To meet the needs of all Scheme members, some of these taxis require the capacity to carry wheelchairs. Some local authorities have contracts with the taxi operators participating in the Scheme, while others do not.⁴³ The content of these contracts with taxi companies varies between regions, and may contain training requirements and/or include the provision of wheelchair accessible taxis in their fleet. There appears to be variability in the quality and standard of service provided by operators to Scheme members, although the Taxi Federation has produced a training video for its members to improve standards.

Wheelchair accessible taxi vehicles

Each local authority determines the level of financial support provided for the capital costs for the purchase and installation of wheelchair hoists and vans. This varies between full or partial support to cover the purchase and installation cost of a hoist. In 2003 the financial assistance rate (FAR) increased from 40% to 60% to encourage local authorities to replace ageing wheelchair hoists in taxi vans.

⁴³ At least four local authorities do not have contracts with Scheme taxi operators.

The Ministry of Education also contracts these vehicles for conveying children with special needs, to and from school. As a result, wheelchair accessible taxi services are often not available to Total Mobility Scheme members at these times. These contracts are important for the financial viability of wheelchair accessible taxis. It should be noted that the Ministry of Education does not provide any direct contribution to the capital costs for purchase and installation of hoists (however this may be incorporated in the fare structure).

4.6.2 Key issues

The key issues relate to inadequate contracting arrangements between local authorities and Scheme transport operators, and the seemingly insufficient numbers of wheelchair accessible transport services. With regard to the first, there is both an absence of any contracting arrangements in some regions, and variability between contracts in other regions. This situation contributes to the inconsistency in the quality and levels of service provided throughout the country.

The Taxi Federation has advised that wheelchair accessible taxis tend to be less profitable than other taxi vehicles due to high capital costs, and fare structures that do not fairly reflect their higher running costs. These higher running costs are associated with increased unpaid time travelling between fares, and for loading, unloading and providing special assistance. Currently two local authorities have implemented mechanisms⁴⁴ to compensate operators for the higher operating costs of wheelchair accessible taxis. [The capital costs for the purchase and installation of wheelchair hoists is currently subsidised by local authorities (to a varying extent) and Land Transport NZ, and subject to a 60% FAR for replacement hoists and a 40% FAR for the installation of new hoists].

There is a requirement for wheelchair hoists to meet a specified standard at the time of installation, however there is no requirement for on-going safety checks. This creates potential risk for people using wheelchair hoists, and provides no mechanisms for gauging the extent to the wheelchair hoist vehicles are mechanically sound.

In some regions, it is likely that taxis are operating in areas where there is no Scheme, potentially providing the extension of the Scheme into these areas. It is recognised that these same areas may not be subject to a public transport component of the local authority rates, and may not provide other bus, train or ferry services. Nonetheless, extending the Scheme into these areas may meet current unmet need, and could be investigated by local authorities.⁴⁵

As already noted, the Scheme transport service is mostly provided by taxis, however this situation is not necessarily optimal. There is potential to allow or encourage other transport operators to participate in the Scheme. For instance transport services that are operated by community trusts, and other operators that solely operate wheelchair accessible vehicles. It is of course essential that

⁴⁴ See Appendix 6 for details.

⁴⁵ In Southland, Gore operates a Total Mobility Scheme even though it does not provide local bus services.

Scheme transport operators meet legal licensing requirements and have appropriate contracts with local authorities.

The following recommended improvements focus on implementing arrangements to improve accountability between transport operators and local authorities, and improving the quality and quantity of wheelchair accessible taxis. They also encourage the participation of appropriate transport operators in the Scheme. Collectively these recommendations improve the adequacy, consistency and sustainability of the Scheme. (see Appendix 7)

4.6.3 Recommended improvements

aa) That Land Transport NZ develops guidelines for contracts between local authorities and Total Mobility Scheme transport operators to ensure high quality and adequate service levels, including the provision of wheelchair accessible taxis within the fleets.

Contracts should specify requirements relating to: interpersonal skills and appropriate training for drivers; appropriate safety procedures (e.g. securing people and aids etc); vehicle and hoist safety standards; fare structures; hours of operation; and availability to ensure an adequate service (especially with regard to wheelchair accessible vehicles).

This proposed improvement was supported by 95% of submissions.

bb) That local authorities enter into contracts with transport operators, aligned with the guidelines produced by Land Transport NZ.

Requirements for appropriate contracts with appropriate transport providers will have a significant role in ensuring an acceptable quality and standard of service. Appropriate contracts can also support an adequate wheelchair accessible transport service.

cc) That Land Transport NZ encourages adequate provision of wheelchair accessible taxis by providing a flat payment (in addition to the fare) to the transport operator for each trip taken by a Total Mobility Scheme member using a wheelchair hoist.

It is recommended that this flat payment be calculated to include both the higher operating costs of these vehicles, as well as the capital costs of purchasing and installing the wheelchair hoist. This approach is consistent with the way the Ministry of Education contracts for wheelchair hoist taxi services. [Currently the purchase and installation cost of wheelchair hoists is subsidised by local authorities and Land Transport NZ, and is subject to a 60% FAR for replacement hoists and 40% FAR for new hoists]. However this recommendation has not been properly modelled, and further work will be necessary to calculate an appropriate level of payment.

This recommendation has not been subject to consultation, and will not necessarily be welcomed by the Taxi Federation. It should be noted that the Taxi Federation is

an advocate of increasing the FAR to 100% for the purchase and installation of wheelchair taxi hoists, in addition to a flat payment per trip to take account of increased operating costs.

This recommendation was not specifically included in the consultation document.

dd) That Land Transport NZ investigates the establishment of an appropriate regime to ensure that wheelchair hoists meet acceptable safety standards.

An associated issue includes the need for regular safety checks of wheelchair hoists as there is currently no appropriate testing regime. Without such a regime, it is difficult to assess the adequacy of the current fleet of wheelchair hoist equipped taxi vehicles, and even more obviously, to protect the safety of people using these hoists.

This recommendation was not specifically included in the consultation document.

ee) That local authorities are encouraged to investigate the possibility of contracting taxi services operating in areas that are not currently covered by the Total Mobility Scheme, to provide a Scheme service.

Currently there are some areas that operate taxi services, but do not operate a Total Mobility Scheme. Potentially the Scheme could be extended into these areas.

This recommendation was not included in the consultation document.

ff) That the possibility of other types of transport providers participating in the Total Mobility Scheme is investigated.

The proposal (contained in the consultation document) to improve and increase the fleet of wheelchair accessible taxi services was supported by 85% of consultation submissions. Issues for improvement included: ageing vehicle fleet and hoists, lack of safety checks, ongoing driver training, additional funding for loading and unloading and availability of vehicles at peak times.

5. FUNDING AND IMPLEMENTATION OF THE PROPOSED POLICY FRAMEWORK

5.1 Implications for Local government and Land Transport NZ

Local government engagement and support is pivotal to the successful implementation of any improvements to the Scheme. The proposed policy framework outlined in this report clearly positions the Scheme as a local government responsibility, consistent with their responsibilities in the provision of public transport. All of the recommendations have significant impacts for local authorities, and if these are to be acceptable, they will need to be supported by a significant funding increase to the Scheme from central government.

It has been made very clear from local government representatives (and officials) that they have significant concerns about the current funding of the Scheme. Some have called for a considerably more generous central government contribution while others have argued that central government should accept full financial responsibility for the Scheme. A recent meeting of regional council chief executives (May 2005) expressed a strong concern about unsustainable “exponential” growth in the regional council share of funding. They were also critical that the issue of “who should pay for the Scheme” and “why” had not been addressed by the Review, and considered the Scheme was a central rather than a local government responsibility.⁴⁶ It should be noted however, that while the Scheme is a high cost service and growth has been steady, it has not been exponential.

The recommendations contained in this report also have significant resource implications for Land Transport NZ. They assign Land Transport NZ a key role in providing the necessary leadership, co-ordination and funding to implement these recommendations.

5.2 Changes to the Financial Assistance Rate (FAR)

The Financial Assistance Rate (FAR) for the Scheme will need to be increased to implement the recommendations contained in this report. Table One below recommends phasing staged increases to the FAR to implement the recommended improvements.

These phases will be further described under each of the recommendations below. It should be noted that the costs of implementing the recommendations are based on estimates, and that these are subject to significant data deficiencies. Further details about the estimated costs linked with each recommendation are shown in Appendix 10. This table also assumes that the funding allocation to the Scheme by local authorities will remain at current levels, and that they will be prepared to implement the improvements sought by government at the increased FAR.

⁴⁶ See briefing to the Minister WGTA5883 dated 2 June 2005.

Table 1: Phases at different levels of Financial Assistance Rate⁴⁷

Recommendations	Indicative cost to Regional Councils ⁴⁸ (\$)	Indicative Cost to Land Transport NZ			Total indicative cost of Scheme (\$)	% increase per yr in total cost of Scheme
		FAR	Total indicative cost to Land Transport NZ ⁴⁹ (\$)	Increased indicative cost to Land Transport NZ (\$)		
Past year – <u>2004/05</u>	5,200,000 ⁴	40%	3,340,000		8,540,000	
Current year: base-line – <u>2005/06</u>	5,600,000 ⁴	40%	3,580,000		9,180,000	
Phase 1: Recommendation gg) Increase of the FAR for the Scheme to 50% for local authorities that implement the specified recommended changes to the Total Mobility Scheme as outlined in paragraph 7.7. This is subject to local authority funding to the Scheme not falling below budgeted 2005/06 levels. The current number of people on the Scheme is approximately 43,000. Effective from the 2005/06 financial year. <i>Improves: alignment with patronage funding FAR and extends coverage of the Scheme.</i>	5,600,000 ⁵⁰	50%	5,600,000	2,020,000	11,200,000	22%
Phase 2: Recommendation hh) Local authorities agree to adopt all recommendations <u>excluding</u> (i) people who live in areas without access to bus, train or ferry services and (z) promotion of the Scheme. The number of people on the Scheme would be approximately 45,000. Effective from the 2006/07 financial year (for local authorities who implement recommended improvements) <i>Improves: adequacy, portability, sustainability and consistency.</i>	5,600,000	60%	8,400,000	2,800,000	14,000,000	25%
Phase 3⁵¹: Recommendation ii) Local authorities agree to adopt all recommendations including (i) <u>and</u> (z) some targeted promotion of the Scheme. The number of people on the Scheme would increase to approximately 69,000. Effective from the 2007/08 financial year (for local authorities who implement recommended improvements) <i>Improves: adequacy, portability, sustainability, consistency and some aspects of coverage.</i>	5,600,000		13,070,000	4,670,000	18,670,000	33%
Phase 4⁵¹: Not recommended Local authorities agree to adopt all recommendations including extending the coverage of the Scheme. The number of people on the Scheme would increase to approximately 107,900. <i>Improves: adequacy, portability, sustainability, consistency and coverage.</i>	5,600,000		27,340,000	14,270,000	32,940,000	76%

⁴⁷ Source of funding estimates: Land Transport New Zealand. Estimates are based on expenditure for 2005/06, and do not take into account the \$450,000 average per annum growth in total expenditure on the Scheme that may need to be factored into final funding forecasts.

⁴⁸ This is the real cost, and excludes any rebate via the FAR. It is assumed that local authorities would agree to maintain at least the same level of expenditure on Total Mobility as present.

⁴⁹ Land Transport NZ has allocated \$3.86 million for the Scheme (including funding for wheelchair hoist replacement) for the 2005/06 financial year.

⁵⁰ This figure does not include costs related to the replacement of wheelchair hoists (\$190,100 in the 2005/06 financial year). The replacement of wheelchair hoists currently attracts a 60% FAR.

⁵¹ This may be achieved either through an increased FAR or an alternative incentive.

5.3 Recommended Improvements

*gg) For those local authorities that implement specified recommended changes to the Total Mobility Scheme as outlined in section 5.2, central government (through Land Transport NZ) will increase its share of funding responsibility for the Scheme to **50%**. This is subject to local authority funding to the Scheme not falling below budgeted 2005/06 levels. This increase to a **50% FAR** will be effective for the current financial year (2005/06).*

This recommendation is shown as phase one on Table One above. Phase one provides for an increased FAR of 50% effective from 1 July 2005, to align the FAR with that which applies to the patronage funding Scheme⁵². This increase would apply to all local authorities operating the Scheme, and who agree to implement specific immediate improvements with regard to the Scheme purpose, eligibility and some aspects of entitlement. These are:

- To agree to the recommended purpose statement (recommendations a, b and c). Agreeing to the purpose statement requires a commitment to implement a series of future improvements to the Scheme in order to give it proper effect.
- To agree to implement the recommended eligibility criteria (recommendation d).
- To agree that people with impairments who meet the criteria for the Scheme, and are able to use bus, train or ferry services some of the time, but not all of the time, are eligible for the Scheme (recommendation e).
- To agree that people who meet the criteria for the Scheme and have an impairment that has lasted or is expected to last for six months or more, are eligible for the Scheme (recommendation f).
- To agree that children with impairments who meet the criteria for the Scheme will be accepted on the Scheme (recommendation g).
- To agree that people who live in residential care who meet the criteria for the Scheme will be accepted on the Scheme (recommendation h).
- To agree that the fare subsidy for the Scheme will be 50% (recommendation j).
- To agree that the Scheme will have no minimum fare threshold (recommendation k).
- To agree that there will be no restrictions on the purpose of the trip for the Total Mobility Scheme (recommendation o).

This increased financial assistance rate would provide additional support until the commencement of the second phase. It also signals government commitment to improve access and mobility for the transport disadvantaged, and to the NZ Disability Strategy.

⁵² The patronage funding Scheme has an average FAR 50% in 2005/06.

hh) For those local authorities that implement specified recommended changes to the Total Mobility Scheme as negotiated with Land Transport New Zealand, central government (through Land Transport NZ) will increase its share of funding responsibility for the Scheme to 60%. This is subject to local authority funding to the Scheme not falling below budgeted 2005/06 levels. The increase to a 60% FAR will be operative commencing in the 2006/07 financial year.

Phase two provides for an increased financial assistance rate to 60% subject to local authority agreement to implement further improvements to their respective schemes. It is proposed that local authority funding to the Scheme does not reduce below the budgeted 2005/06 levels. This phase will assist all local authorities implement most of the recommendations except two (i and z) which relate to increasing the coverage of the Scheme.

ii) A further increase in the FAR, or an alternative incentive will be available for those local authorities that implement some targeted promotion of the Total Mobility Scheme, and extend coverage to people who live in areas without access to public transport, as negotiated with Land Transport New Zealand. For those local authorities, central government (through Land Transport NZ) will increase its share of funding responsibility for the Scheme. The increase will be operative commencing in the 2007/08 financial year.

This recommendation, shown as phase three on Table One provides for an increased FAR or an alternative incentive for local authorities to undertake some targeted promotion of the Scheme (recommendation z), and to extend coverage to people who live in areas without access to bus, train or ferry services (recommendation i). As each local authority is at a different starting point, some will be ready to implement these recommendations before other local authorities. Those local authorities which are in a position to implement these two recommendations (whether fully or partially), and have negotiated an appropriate implementation plan with Land Transport NZ, should be eligible for an increased FAR or an alternative incentive for the Scheme.

At this time it is not prudent to recommend increases in the FAR above 60% until estimates can be undertaken using more reliable data. Potentially up to 29,600 additional people become eligible for the Scheme, although it is highly unlikely that all will choose to join (if they know about it). Table One assumes that 24,000 additional people will become members of the Scheme as a basis for estimating costs. Promotion of the Scheme undertaken during this phase should be carefully targeted and the effects closely monitored. This will provide additional information to improve estimates regarding potential numbers of new members and associated costs.

Phase four is not recommended at this time, for two reasons. Firstly local authorities are not in a position to fully implement recommendations that will lead to significantly increased members on the Scheme. This could potentially overwhelm the current structure of the Scheme. Secondly, it is unclear as to the number of potential members that may choose to join the Scheme, and the level of funding that could be necessary. The figures shown on Table One are indicative

estimates only, and should be recalculated at a future time when more reliable data becomes available.

The estimated costs that are associated with phase four significantly increases current Land Transport NZ spending on the Scheme. This very rough estimate assumes that 64,000⁵³ additional new members will be accepted into the Scheme, and that these members will use the Scheme to the same level as other Scheme members. It is highly likely that the estimated increase in numbers is overstated, as many people will choose not to use the Scheme, even if they know about it.

The recommended improvement to promote the Scheme (recommendation z) is estimated to significantly increase costs to the Scheme, more than any other single recommendation. Nonetheless it should be a priority recommendation over extending coverage of the Scheme to people who are currently not eligible (recommendation i). It is difficult to justify extending the eligibility criteria to a new group, before ensuring that current eligible members are aware of the Scheme and using it if they choose to do so.

6. LOOKING TO THE FUTURE

The New Zealand Transport Strategy outlines government's five objectives for transport, one of which is to improve access and mobility. This objective recognises the need for appropriate transport for all, including the transport impaired, in order to enhance participation and independence and reduce social exclusion. The Review of the Total Mobility Scheme, and the implementation of recommended improvements, will be a significant contribution towards the progress of this objective.

The Scheme in its present form, however, can never meet the transport needs of all those who may depend on its services. It will be necessary to explore options to improve the accessibility of mainstream public transport, and to develop other forms of specialised transport services that may be more cost effective and provide better coverage than the Scheme can achieve alone. Such services may assist in meeting the needs of any people who are transport disadvantaged, whether as a result of income, location, impairment or other reasons. It is likely that a continuum of different types of public transport services will be required to meet a diverse and wide range of transport needs (see Appendix 11).

Little is known about the current levels of access to transport and the extent to which access is adequate. In particular the level of access to transport by specific sub-population groups, especially the transport disadvantaged is unclear.

⁵³ This is based on the fact that while there are approximately 43,000 members on the Scheme, this could potentially increase to 108,000 eligible people. This is a very rough estimate based on data provided by Statistics New Zealand (see Appendix 8).

Although there is a legal requirement that the “needs of transport disadvantaged must be considered”, the term ‘transport disadvantaged’ has never been defined.⁵⁴

The extent to which access to transport is the human right of all New Zealanders, and the appropriate responsibility of the transport sector (and government), is an issue of current interest. The recently released Human Rights Commission Inquiry Report into Accessible Public Land Transport provides significant impetus for further work in this area. Many other countries are also alert to these issues.⁵⁵ Finland for instance, guarantees citizens access to safe, reasonably priced and high-quality transport.⁵⁶

Overall, there remains an outstanding need to develop a wider public transport policy framework for improving access and mobility for all New Zealanders. It should encompass the specific needs of people who are transport disadvantaged, and encourage the best mix of services to address their needs. It would also provide a firmer context for positioning the Total Mobility Scheme, in relation to other complementary transport services. The development of such a framework will be one of the next challenges for the future.

⁵⁴ Land Transport Management Act 2003 requires that the “needs of transport disadvantaged must be considered” (sect 35).

⁵⁵ For instance: Australia (Disability Discrimination Act 1992), the United States (Americans with Disabilities Act 1990), Britain (Disability Discrimination Act 1995), and Canada (National Transportation Act 1987).

⁵⁶ *An Evaluation of the Finnish Public Transport System: The Role of the Ministry of Transport and Communications*. Paper commissioned by the Ministry of Transport and Communications, Finland, February 2003.