

National Association of Financial Assessment Officers (NAFAO)

PIP Assessment Development Team
Department for Work and Pensions
Submitted by email to: pip.assessment@dwp.gsi.gov.uk

30 April 2012

Dear PIP Assessment Development Team,

Consultation on Personal Independence Payment - Assessment thresholds and criteria

Please find below National Association of Financial Assessment Officers response.

We welcome moves to simplify the assessment and payments of disability and related benefits. We also welcome a points system that enables a more consistent and objective decision-making process to be applied to claims than is currently the case for DLA. However, we have some concerns:

- While councils will not have a role in the delivery of PIP there will be people who formerly qualified for DLA who will no longer be eligible for support with a consequential risk of an increased demand on councils' assessment, financial support and services alongside a loss of essential income for vulnerable people who need support to live independent lives. The expectation that 20% of Disability Living Allowance claimants will not qualify for PIP validates this concern.
- The proposed changes present local government with the challenge of linking PIP assessment to Adult Social Care assessment as there could be conflict if the same criteria are not used.
- If the net amount of people able to claim is less or reduced over time there could be a significant financial impact on Local Authorities. The financial burden will be further compounded by transfers of cost pressures related to the localising of other schemes including council tax benefit, housing benefit and the social fund.
- Financial pressures on local authorities may force them to pay less for services which could affect the financial viability of independent service providers. Making savings in one area to increase costs elsewhere does not seem to make economic sense.
- DLA care is currently differentiated for inclusion of night care needed. It is not clear if this is covered in the new PIP. If there is no clarification that night care is in the new benefits, Local Authorities will not be able to disregard the night element monetary amount with the net effect of us having to charge people more. Conversely, if vulnerable people are receiving less benefit and thus less income, we may have to consider charging some people less which will in turn affect our finances.
- The mobility component of DLA is not chargeable income for services and many service users will use the high rate mobility component to purchase or lease a vehicle to enable them to get about. PIP is far more prescriptive and we are concerned that disabled people who currently qualify for the high rate mobility component will fall foul of Activity 11 Descriptor D and only qualify for the standard rate for PIP. This concern also applies to future claimants of PIP who will be in the same position.
- Blue Badge assessments will be affected in that assessments will need to increase due to the decrease in the number of automatic qualifications.
- Finally, we are also concerned that the combined impact of the recession, local government budget resource constraints and wider welfare reforms may result in unanticipated consequences notably an increase in demand for support from local authorities, particularly amongst those who are already vulnerable.

On behalf of NAFAO: T King Chairperson, ASC.NAFAO@Eastsussex.gov.uk