

Technical aids in administrative twists and turns

Riga 2024



Latvijas Republikas Valsts kontrole



Audit report

"Technical aids in administrative twists and turns"

Performance audit "Are publicly funded technical aids provided according to the needs of the target group and in the best possible way?

The audit was performed based on audit schedule No 2.4.1-41/2023 of the Third Audit Department of the State Audit Office of Latvia of 2 October 2023.

The Audit Report is approved under decision No 2.4.1-41/2023 of the Third Audit Department of the State Audit Office of Latvia of 28 November 2024.

The cover design includes an image from the website <u>www.depositphotos.com</u>.

Dear Reader,



Technical aids are an essential social service that more than 20 thousand Latvian residents receive annually.

The need to use technical aids is not only for disabled people but it can arise for anyone both after surgery

during recovery period and after various injuries (for example, fractures, dislocations), and as a result of age and illness. They facilitate ability of people to move, take care of themselves and integrate into society, including in educational process and working environment, which is a prerequisite for the well-being of every person.

For several years now, the public has been discussing the necessary reforms to ensure this function inter alia several studies have been commissioned, which have identified problems in the field and proposed several solutions, however, significant reforms have not been implemented.

As a compromise, the "basket" of state-funded technical aids has been improved and the principle of co-financing has been introduced: a person with prior permission can purchase a technical aid at his or her own expense and then receive compensation for the purchase costs from the state budget in an amount determined by the state.

However, there are still negative comments in the public space about both the long waiting lines for receiving technical aids and the co-payment mechanism because technical aids, such as wheelchairs, are expensive and people do not have the means to purchase them with their own money in the first place.

In addition, given the aging of population, the demand for technical aids will only increase in the future. Therefore, the Ministry of Welfare must do everything possible to ensure that the funding available for the service is used meaningfully and in accordance with the needs of the target group.

We appreciate that with the change of the management at the end of May 2024, the Vaivari Technical Aids Centre already started work to resolve many of the problems identified during the audit.

We would like to thank the Ministry of Welfare and its contracting organizations, the Vaivari Technical Aids Centre, Latvian Society of the Blind and Latvian Association of the Deaf, as well as the Ministry of Health for their cooperation.

Special thanks to the Latvian Cooperation Organization for People with Special Needs "Sustento", Association of Disabled People and Their Friends "Apeirons", the Children's Hospital Foundation and Ziedot.lv for their support and exchange of views, as well as to professionals in the field for participating in the expert discussion organized during the audit: Study Programme Director of "Ergotherapy" of Riga Stradiņš University (RSU), Lecturer, Occupational Vice-President Therapist, of the Latvian Association of Occupational Therapists Zane Liepiņa, Prof. Dr.med. Signe Tomsone (RSU), Doc., PhD Daiga Behmane (RSU), Head of the Rehabilitation Clinic of the Children's Clinical University Hospital, Doctor of Physical and Rehabilitation Medicine Gunta Kristapsone, Physiotherapist, Board Member of Rehabilitation Centre "Poga" Egija Bidina and CEO of Sustento Gunta Anča and Policy Coordinator Iveta Neimane.

Respectfully Ms Maija Āboliņa Department Director

Summary Main conclusions

The audit findings have led to the conclusion that state-funded technical aids are not provided to the population in the best possible way because the provision of the service is not organized in such a way that residents receive technical aids in a timely manner and as close to their place of residence as possible.

The Ministry of Welfare has also not demanded the best possible result from the service providers, its contractual organizations, to which the performance of the function has been delegated, namely the Vaivari Technical Aids Centre (Vaivari TAC), the Latvian Society of the Blind (LSB) and the Latvian Association of the Deaf (LAD). Without delving into the causes of the problems, it mostly saw only the allocation of additional funding as a solution to the problems, although it was possible to improve the activities of the service providers organizationally with the funding already allocated.

The problems identified in the audit mainly concern the Vaivari TAC, which provides technical aids to 69% of all the recipients of technical aids.

The funding for the performance of the function was increased by 2.1 million euros from 2023, and the unspent funding in previous periods reached 17.1 million euros¹ together with the contracting organization in 2023. Of this funding, the Vaivari TAC did not use at least 3.14 million euros² in 2023 but the Ministry of Welfare reallocated 0.83 million euros to solve other problems relevant to the welfare sector in December 2023.

To tackle several problems identified in the audit, according to the auditors' estimates, the Vaivari TAC needed only 179 thousand euros³ in 2023.

- Firstly, it was possible to reduce the waiting lines significantly for receiving technical aids provided by the Vaivari TAC. The audit found that in at least 877 cases, waiting in line was not justified because a sufficient number of technical aids were available in the Vaivari TAC warehouse but the Vaivari TAC could not cope with their issuance. In total, as of 31 December 2023, the Vaivari TAC warehouses included 5,721 industrially produced technical aids but 3,486 residents were waiting in line for them⁴.
- Secondly, it was possible to improve the content and accessibility of the technical aids service. For instance, to increase the amount of state compensation if a person needed a specially modified technical aid to compensate for functional disorders and to deliver certain types of technical aids to the person's place of residence, thereby facilitating and accelerating their receipt significantly.

The auditors draw attention to the fact that the situation is similar in 2024. Almost 14 million euros⁵ are available to all contracting organizations to perform the function. Of this funding, 74% has been spent by the end of September but another 3.5 million euros must be absorbed by the end of the year. Meanwhile, 4,330 industrially produced technical aids were available in the warehouses of Vaivari TAC on 30 September 2024 but 3,530 residents were waiting in line for them.

Limited availability of specialists for obtaining an opinion

To receive a technical aid, a person needs a medical opinion. To receive a technical aid provided by the Vaivari TAC, a medical opinion from a medical practitioner such as a treating doctor or functional specialist must be submitted in all cases, regardless of whether this information is already available at the Vaivari TAC (including if the technical aid is requested repeatedly).

In its turn, to receive a typhlotechnics or sign language technology, a medical opinion must be submitted only if this information is not already at the disposal of the service provider, LSB and LAD. Therefore, the availability of specialists who can provide an opinion for the receipt of typhlotechnics or sign language technology is not so decisive.

The audit has found that specialists who can provide an opinion for receiving technical aids provided by the Vaivari TAC are not always available, and this hinders the ability to receive technical aids in a timely manner as soon as the need for them arises.

When analysing the availability of physical and rehabilitation medicine doctors, occupational therapists and physiotherapists, whose direct competence is to assess a person's functional status and determine the need for technical aids, it has been found that the waiting time for a state-funded visit with them is on average 103 days and can reach even a year.

The availability of technical orthopaedists, whose direct competence is to assess the need for prostheses, orthoses and orthopaedic shoes, as well as to manufacture and adjust them, is particularly critical. Although there were 82 technical orthopaedists registered in the Register of Medical Practitioners on 2 May 2024, only seven of them (six in Riga and one in Jurmala) had concluded a contract with the National Health Service.

In their turn, some people also require an in-depth functional assessment in addition to the opinion of a medical practitioner to receive technical aids provided by the Vaivari TAC. In accordance with the Cabinet Regulation⁶, only the Functional Assessment Laboratory⁷ established within the structure of Vaivari TAC provides that where the assessment of the functioning of people is carried out by a multiprofessional team of specialists including a physical and rehabilitation medicine doctor, an occupational therapist, a physiotherapist, a technical orthopaedist, an audio-speech therapist, etc.

Since the Vaivari TAC Laboratory operates only in the premises of the Vaivari TAC in Riga, people with various functional limitations from all regions of Latvia have to travel to the capital. Moreover, they have to wait for the assessment, as the Laboratory capacity is limited.

For several years, various studies have proposed integrating the provision of technical aids into the healthcare system, as is the case in Estonia. However, the auditors consider that primary solutions for improving the process of determining the need for technical aids must be found within the existing system.



To reduce the waiting time for receiving a medical opinion, the auditors believe that the option already proposed in the studies to group technical aids according to their complexity and to determine a circle of specialists for each group who are entitled to provide an opinion should be implemented.

For simple technical aids, it would be the broadest range of specialists, including general practitioners or even social service specialists, who are already assessing a customer's functional status currently

for the purpose of receiving several social services (for example, for assistant services in a local or regional government, for a statement on the need for special care). Specialist doctors could assess the need for moderately complicated technical aids and multi-professional specialist teams for complicated ones by ensuring their availability also outside the Vaivari TAC in other medical institutions in Riga and elsewhere in Latvia.

It should also be provided that all medical practitioners use and draft a single functional assessment protocols electronically developed by the National Rehabilitation Centre Vaivari for their assessments, from which an opinion for receiving a technical aid can be generated automatically, thus improving the quality of the opinions significantly.

To make this process more user-friendly for users of technical aids, reviewing is required whether a medical practitioner's opinion is needed in all cases when a person requests a technical aid repeatedly, i.e., only replaces it. As indicated above, the LSB and the LAD use this approach which request a medical practitioner's opinion only if the necessary information is not already at their disposal.

> Unjustifiable bureaucracy and inaction in the process of granting technical aids

To receive a technical aid, a person applies to a contracting organization by submitting the aforementioned medical opinion.

When assessing the process of granting technical aids, the auditors have detected that decisions on granting technical aids and/or admitting persons to the waiting line in all three contracting organizations are made in accordance with the procedure and deadlines provided for in laws and regulations in general. However, significant shortcomings have been identified in the subsequent stages of granting technical aids.

The irregularities identified in the audit mainly concern the Vaivari TAC, in whose operations the use of information technologies is particularly important taking into account the number of customers served and the amount of technical aids provided. However, the Vaivari TAC specialists perform most of the administrative activities manually at present that requires significant human resources. The reason is the information system used, which is technologically outdated and cannot provide all the necessary functions.

In addition, the work processes themselves are not organized in the best possible way at the Vaivari TAC because the procedure for administering the technical aids service has not been updated for 10 years, it has not been assessed which steps of the process require the involvement of the Vaivari TAC medical professionals (occupational therapists) and which can be performed by other employees, and the deadlines for the implementation of the activities have not been set.

The problems start with the established procedure for managing waiting lines for technical aids. A total of 63 waiting lines have been created, which are organised simultaneously for several types of technical aids, rather than for each of the 225 types of technical aids. Therefore, when reviewing the waiting line, information about the technical aid needed by a person (type, size, model, etc.) is checked manually for each person.

It is not specified when and how often each of the 63 waiting lines should be reviewed. For instance, the waiting lines for individually manufactured technical aids were reviewed every week in 2023 while those for industrially manufactured technical aids were reviewed less often than once a month (the waiting line for children's activity chairs was reviewed four times a year while the waiting line for walking frames was reviewed 11 times a year)⁸.

Also, for those persons who have the right to receive a technical aid on an urgent basis in cases provided for in the Cabinet Regulation⁹, the waiting time depends on the frequency of reviewing that waiting line and the time when the person was registered in the line since all persons are registered in a common waiting line. Priority is observed only during the review of waiting line when technical aids available in the warehouse are reserved as a priority for those persons who need them urgently. From 1 January 2020 to 31 December 2023, people received a technical aid urgently on average after 71 days, and after 110 days in a regular procedure.

In addition, the audit has discovered that even in cases where a sufficient number of relevant technical aids are available in the warehouse, only a part of the available aids is covered during the review of the waiting line and a decision is made to issue technical aids only to a limited number of people.

The audit found at least 1,474 cases when people were waiting in line to receive technical aids provided by the Vaivari TAC, and they were available in the Vaivari TAC warehouse. However, invitation letters to receive technical aids were prepared for only 597 persons (41%). It means that the waiting lines created for 877 persons were not justified, and these technical aids could have already been issued.

Even if a responsible employee has made a decision to issue the necessary technical aid to an individual, invitation letters for receiving technical aids are not prepared immediately but even more than in a month's time without taking into account whether and which persons needed the technical aid urgently. For example, after reviewing the *"Rollators"* waiting line on 30 October 2023, invitation letters were prepared up to 28 November 2023. Of these, a letter to one individual, who was granted a technical aid in the usual manner, was drafted on 13 November 2023 but a letter to an individual who needed a rollator urgently, was drafted two weeks later, that is, only on 28 November 2023.

The audit has detected that the rights of individuals to receive technical aids in a timely manner are also affected by how contracting organisations plan and organise procurement of technical aids and determine a required number of technical aids. Although contracting organisations organise procurement in general in such a way that there are no interruptions in the service of technical aids, the audit has identified several cases where an interruption nevertheless occurred because procurement planning had not been initiated in a timely manner, it was impossible to conclude a contract for the supply or manufacture of technical aids, or an insufficient number of technical aids was planned and purchased in a procurement.



A person's ability to receive a technical aid provided by the Vaivari TAC is influenced by when and how often a responsible employee evaluates the relevant waiting line.

Even technical aids that are in stock in the Vaivari TAC are not allocated and the waiting lines are not always justified.



To improve the effectiveness of granting technical aids, the Ministry of Welfare planned to introduce a new and process-based functionality in the State Social Policy Monitoring Information System (hereinafter – SPOLIS) from December 2023, id est, the Technical Aids Administration Module (hereinafter – TAA Module) which all contracting organisations would use.

There was no opportunity to assess during the audit whether the TAA Module would eliminate all identified problems in the administration of the service, as the development of the module was completed by October 2024 but testing and improvement of its functionality, as well as the creation of several work processes, continued.

According to the auditors, the TAA Module will automate the processes of administering technical aids only partially. For instance, the TAA Module does not link waiting lines for technical aids with operational information on a number of technical aids available in the warehouse. Therefore, there is a risk that when assessing an individual's application, the Vaivari TAC will still not be able to check promptly whether the technical aid needed by the individual is available in the warehouse. Also, the ability to generate letters and internal control system notifications automatically from the Module has not yet been implemented, and the ability to produce the necessary reviews and reports has not been provided.

The shortcomings of the TAA Module are related mainly to the fact that the Ministry of Welfare, as the project promoter, did not conduct sufficient research and optimisation of the work processes of contracting organisations before its development to offer more advanced information technology solutions. The TAA Module incorporates basically the existing service administration processes with some visual improvements.

> Receiving technical aids is cumbersome for population

After the turn to receive a technical aid has come, it is issued when the individual or their representative arrives at the contracting organisation or at the service provider specified by the contracting organisation.

The established procedure, whereby technical aids are issued only in person at departments/branches of contracting organisations or at field locations regardless of their functionality and complexity, which only cover a portion of local and regional governments, limits people from receiving the technical aids they need as close to their place of residence as possible, as soon as those aids are available.

The audit found that between 2020 and 2023, customers of the Vaivari TAC who received a technical aid during a visit or home visit from the employees of Vaivari TAC had to wait an average of 57 days from the invitation to receive the technical aid until the actual receipt thereof, and even longer than three months in several cases¹⁰.



One of the solutions to speed up the receipt of technical aids is to deliver simple technical aids (e.g., sock pullers, bath boards or chairs, shower or toilet chairs, toilet seat elevations, grab bars, support handles) that do not require specialised knowledge and training in their use (especially in cases where a customer receives them repeatedly) by mail, courier or using a parcel machine.

It is also possible to consider including the delivery of bulky and heavy or bulky technical aids (at least functional beds, mobile lifts, electric wheelchairs) in the service. The delivery of these aids from the Vaivari TAC branch to the person's place of residence is a significant burden for the recipients of technical aids or their relatives, as transport and even a lifting service are required but the Vaivari TAC does not offer such a service even if a home visit has been requested.

This would both benefit individuals financially, as their travel costs from their place of residence to receiving the service and back would be reduced, and the time taken to receive technical aids would also be significantly reduced. For instance, for simple technical aids, the time from making a decision on granting the service to receiving it would be reduced by an average of 79 days and would constitute 12 days.

Simple and bulky technical aids currently account for 51% of the industrially produced technical aids issued by the Vaivari TAC.



By improving the opportunities for receiving technical aids, both residents and the contracting organizations themselves will benefit.

Therefore, if resources related to the in-person issuance of these technical aids are freed up, it is possible to target field trips and home visits to those individuals for whom the presence of the specialists of Vaivari TAC is essential for the issuance of technical aids, as well as to organise additional field trips, especially to those local and regional governments where the receipt of technical aids is currently not ensured.

> The state-provided "basket" of technical aids is not flexible enough

The audit also assessed whether the "basket" of state-funded technical aids was reviewed and updated regularly, as technical aids to compensate for functional impairments are diverse and evolve constantly.

The "basket" of technical aids provided by the state is generally sufficient and meets the needs of the population, as it has been supplemented significantly in recent years taking into account the needs of target groups.

The opportunities for the population to receive the types of technical aids necessary to compensate for their functional impairments are also supplemented by a co-payment (compensation) mechanism when an individual can purchase a necessary technical aid such as a specific model, specially equipped, with increased functionality, on their own while a contracting organisation compensates for the purchase costs. This mechanism is also a solution in cases where the model (modification) of technical aid needed by an individual is included in the "basket" of technical aids but it is not available at a specific time.

However, the amount of state compensation influences individuals' choice to purchase a technical aid with a co-payment which is not sufficient in all cases. For this reason, people often need donor support to purchase a technical aid that meets their needs.

During the audit, when conducting checks on 112 technical aids purchased with a co-payment, the auditors found that the purchase costs of 21 technical aids were 23,803 euros or 51% higher than the amount of state compensation granted by the Vaivari TAC.

According to the auditors, this is mainly due to the fact that the amount of state compensation for several types of technical aids is determined taking into account budget possibilities, and not the actual purchase costs of the technical aid. Moreover, the Vaivari TAC does not collect such information at all and does not use it in determining and updating the amount of compensation.

The auditors also do not support the approach by which the Ministry of Welfare plans to update the "basket" of technical aids provided for in the Cabinet Regulation¹¹ in 2024 by supplementing it with types of technical aids/ their modifications that are needed only by some individuals (for example, an electric wheelchair with chin control), and reviewing the amount of state compensation for only some technical aids is not the best practice.



Since the development of amendments to laws and regulations requires a significant investment of resources, it is necessary to include a mechanism in a law or regulation by which technical aids are provided in cases where the "basket" of technical aids does not provide for any specific modification of a technical aid but an individual needs it impartially or if the specified co-payment amount is not sufficient for the purchase of a technical aid of a special modification.

Such an approach is already provided for in the Cabinet Regulation¹² with regard to technical aids belonging to the orthosis group, which are not included in the "basket" of technical aids¹³ but have increased functionality. Although an opinion on the necessity of such aids is provided by a multi-professional medical rehabilitation team during an inpatient rehabilitation course, this mechanism is also not complete, as the Cabinet Regulation¹⁴ limits the amount of state compensation.

> Lack of a proper and careful approach by the owner in the circulation and disposal of technical aids

The LSB and the LAD transfer all typhlotechnics and surdotechnics to individuals only in their ownership. In its turn, the Vaivari TAC also transfers technical aids to individuals on lending. It means that when a lending period expires or if a technical aid is no longer needed by an individual, the latter (their relatives) must return the loaned aid to the Vaivari TAC or compensate the value of the issued technical aid in the amount provided for in the Cabinet Regulation¹⁵.

The returned aids, if they are in a usable condition, are a resource for ensuring the demand for technical aids, including reducing the waiting lines. It should also be the purpose of why a part of technical aids is issued not into the possession but only lending.

Currently, the actions of the Vaivari TAC in organising the circulation of loaned technical aids are not economical and do not ensure efficient handling of state resources transferred to the Vaivari TAC.

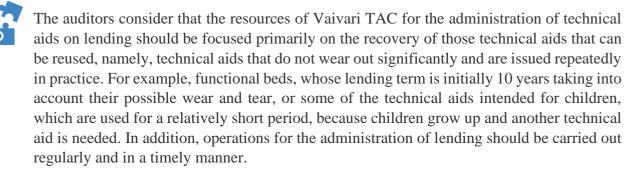
The audit established that the Vaivari TAC only recovered lent technical aids in cases where an individual returned them voluntarily mainly to receive a new technical aid.

In total, between 2020 and 2023, the Vaivari TAC had at least 4,677 technical aids on its books whose lending period had expired but they had not yet been returned. At least 1,043 users of technical aids, or a quarter (25%), had died, some users already in 2014, 2015 and 2016. Letters regarding the return of the lent technical aid were sent in less than half of the cases, and 341 days after the person's death had passed on average and even up to five years after their death for some individuals.

If users of technical aids, including relatives of deceased individuals, have not returned the lent aid or repaid its value, their cases are shelved.

When the statute of limitations set out in the Civil Law, that is, 10 years, sets in, the liabilities are written off, also closing the customer's case.

Technical aids rented from the Vaivari TAC, whose lending period has expired or whose user has died, are returned irregularly and late.



In other cases when lent technical aids wear out, including those that have been used for two terms or even more, the Vaivari TAC must assess whether further administration of such technical aids is efficient given the value of technical aid and potential wear and tear.

The audit also detected significant irregularities in the actions of Vaivari TAC with those lent technical aids that have been returned, are not issued for reuse and have been accumulating in the Vaivari TAC warehouses for years.

When inspecting the Vaivari TAC warehouses in Riga, one has discovered that there is a large amount of used technical aids including written-off ones (electric wheelchairs and scooters, functional beds, anti-decubitus mattresses, etc.), which are located in the warehouses both among the stocks intended for transfer to individuals and in a separate warehouse, where only written-off wheelchairs were located.

The audit was not able to assess how many of the returned technical aids that were not reissued and not written-off were still in usable condition because the Vaivari TAC did not assess a technical aid when accepting it back from an individual and did not indicate the condition of the technical aid in an acceptance certificate. This is later assessed by warehouse employees. If a returned technical aid is worn out and/or damaged and it is impossible to repair it and transfer it for further use, a defect report is prepared and the technical aid is written off.

The Vaivari TAC has been storing technical aids (including those that are unusable) returned voluntarily by individuals in warehouses for years. The Vaivari TPC has also not drafted a procedure for dealing with decommissioned technical aids. Some of the decommissioned aids are disassembled, and their parts are accumulated and used for the repair of other technical aids, some are given to scrap metal, mostly without sorting them by type of metal but some of the aids are taken to a landfill located in the Rezekne Region. For instance, returned anti-decubitus mattresses (including those returned to the Kuldiga branch), which are no longer are issued for reuse from 2022, are taken to a landfill in the Rezekne Region by the Vaivari TAC transport.

In addition, the Vaivari TPC has not found a solution for managing the packaging of technical aids, cardboard and wooden pallets, which can be recycled or reused.

Key recommendations

Based on the audit conclusions, there are six recommendations issued to the Ministry of Welfare, as the leading state institution in the field of social protection and equal opportunities for disabled people.

The State Audit Office of Latvia expects that by implementing audit recommendations:

- ✓ The quality of opinions for receiving technical aids will be improved and population will have the opportunity to receive them faster and more conveniently;
- ✓ The operation of contracting organisations in the administration of technical aids will be improved significantly by ensuring the possibility of receiving technical aids as close to the place of residence as possible, as soon as they are available at a contracting organisation;



- ✓ The mechanism for purchasing technical aids with a co-payment will be improved by facilitating that the amount of state compensation granted is up-to-date and corresponds to the actual price of the technical aid as much as possible, as well as an individual can receive a specially modified technical aid that is not included in the "basket" of technical aids but is impartially necessary for the person;
- ✓ The efficient use of state budget funds will be promoted by organising the circulation of lent technical aids at the Vaivari TAC.

References

- ¹ The funding available to contracting organisations consisted of 11,081,551 euros in 2023, which have been allocated in accordance with the Law on the State Budget for 2023, the balance of advances of 5,337,317 euros from previous periods and the balance of one-time contributions/co-payments of 710,544 euros at the end of the year.
- ² The unused funding of Vaivari TAC in 2023 consisted of the reduced funding for the provision of technical aids of 1,219,176 euros as of 22 December 2023, the balance of one-time contributions/co-payments of 447,518 euros and the balance of advances 1,477,661 euros at the end of 2023.
- ³ The audit estimated that 28,959 euros were needed to ensure the delivery of 3,595 simple technical aids to an individual's place of residence in 2023 by using a courier service, and 29,175 euros to deliver 414 bulky technical aids to an individual's place of residence in 2023. There were 77,826 euros needed to purchase those technical aids additionally in 2023 whose procurement planned to include an insufficient amount of technical aids (See <u>Annex 5</u>). There were 30,126 euros needed for the amount of state compensation for the purchase of 24 child car seats with a co-payment to cover the entire purchase price but 12,956 euros were needed for the amount of state compensation to cover the full purchase price of the 16 technical aids included in the audit scope.
- ⁴ The Vaivari TAC Contractual Obligations Performance Reports for 2023.
- ⁵ Including the advance balance of 2,186,044 euros from 2023.
- ⁶ Chapter V of Cabinet Regulation No 693 of 28 November 2023 amending Cabinet Regulation No 878 "Regulations on Technical Aids" of 21 December 2021.
- ⁷ Until 1 December 2023, the Vaivari TAC Functional Assessment Commission also carried out an in-depth assessment of the functioning of individuals.
- ⁸ An exception was the waiting lines "Functional beds" and "Anti-decubitus mattress", which were reviewed more often, that is, 15 and 17 times, respectively.
- ⁹ Section 10 of Cabinet Regulation No 878 "Regulations on Technical Aids" of 21 December 2021 (valid from 1 January 2022).
- ¹⁰ Of the 364 cases of granting and issuing technical aids reviewed in the detailed inspections in the branches of Vaivari TAC, a technical aid was issued on-site or during a home visit in 71 cases.
- ¹¹ Annex 2 of Cabinet Regulation No 878 "Regulations on Technical Aids" of 21 December 2021 (valid from 1 January 2022).
- ¹² Paragraph 8.2 and Section 40 of Cabinet Regulation No 878 "Regulations on Technical Aids" of 21 December 2021 (valid from 1 January 2022).
- ¹³ Paragraphs 78-119, Annex 2 of Cabinet Regulation No 878 "Regulations on Technical Aids" of 21 December 2021 (valid from 1 January 2022).
- ¹⁴ Paragraph 8.2 and Section 40 of Cabinet Regulation No 878 "Regulations on Technical Aids" of 21 December 2021 (valid from 1 January 2022).
- ¹⁵ Section 18² of Cabinet Regulation No 1474 "Regulations on Technical Aids" of 15 December 2009 (valid until 31 December 2021) and Sectio 31 of Cabinet Regulation No 878 "Regulations on Technical Aids" of 21 December 2021(valid from 1 January 2022).