IRELAND'S **AUTISM** CHARITY

AsIAm Submission to the Department of Social Protection on their Public Consultation on the Cost of Disability

April 2026

1. Introduction

AsIAm welcomes the opportunity to respond to the Public Consultation by the Department of Social Protection on the introduction of a Cost of Disability Payment. The introduction of a Cost of Disability payment represents a critical step towards recognising the additional financial burden faced by Disabled people and their families. Over the last decade, AsIAm has campaigned for a dedicated Cost of Disability Payment to better support Autistic community members to live independently, with dignity and autonomy.

The introduction of a Cost of Disability payment is also closely aligned with the objectives set out in AsIAm's Strategic Plan 2025–2030, which outlines a vision for an Ireland in 2030 where Autistic people can participate fully in society and enjoy equal life chances. The plan emphasises key priorities including improving access to services, promoting employment and economic participation, advancing rights-based policy, and addressing systemic barriers that impact quality of life. Central to these ambitions is the recognition that financial inequality and the additional costs associated with Disability continue to limit autonomy, independence and participation for Autistic people and their families.

The Cost of Disability consultation therefore represents a critical opportunity to deliver on the Strategic Plan's commitments by reducing financial barriers, supporting independent living, and ensuring that public policy reflects the lived experience of Autistic people. In this context, the introduction of a Cost of Disability payment should be understood not as a standalone measure, but as a key enabler of AsIAm's broader strategic goals of equality, inclusion, and full participation in Irish society.

Furthermore, we know from our annual *Same Chance Report* that many of our community members experience additional financial costs that arise from living as an Autistic or Disabled person in Irish society. As a society, we must move away from the inevitable experiences of Disability and poverty. As a high-income country with considerable levels of GNI and GDP, having a Disability should not equate to living in poverty, isolation, or material deprivation.

As a signatory to the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) the State must recognise under Article 28 '*the right of persons with disabilities to an adequate standard of living for themselves and their families, including adequate food, clothing and housing, and to the continuous improvement of living conditions, and shall take appropriate steps to safeguard and promote the realisation of this right without discrimination on the basis of Disability'*.

This consultation process must lead to tangible outcomes and supports for Autistic and Disabled people across the country. It must deliver lasting, impactful, and interconnected solutions across the lifespan and must not be seen in isolation or solely the responsibility of the Department of Social Protection. The Cost of Disability goes beyond financial payments, it also encompasses housing, assistive technology, health needs, leisure and the fundamental rights of autonomy and agency.

The outcomes of this consultation process must remove the inevitable and unfortunate situation that currently exists regarding Disability and poverty. The evidence from national research, including the Indecon Cost of Disability Report, demonstrates that Disability-related costs significantly increase poverty risk and reduce living standards for Disabled people and their households. This process, as envisioned under the *National Human*

Rights Strategy for Disabled People 2025-2030, must lift Autistic and Disabled people out of poverty.

This submission will focus on the following areas:

1. Evidence on the Cost of Disability in Ireland
2. Evidence from the Same Chance Report 2026
3. Types of Additional Costs Faced by Autistic People and Families
4. Employment, Income and Poverty Risk
5. Principles for the Cost of Disability Payment
6. Participation, Leadership and Youth Voice
7. Considerations when Designing a Cost of Disability payment
8. Conclusion
9. Recommendations

Who We Are

AsIAm is Ireland's Autism Charity, we are dedicated to removing the invisible barriers often experienced by Autistic people and families, so that every Autistic person can enjoy the same chance in society. Our vision is for an Ireland to be a country where every Autistic person is accepted as they are. Our purpose is to create an inclusive society for Autistic people that is accessible, accepting and affirming. AsIAm is an Autistic-led organisation and a Disabled Person's Organisation (DPO). AsIAm is a member of the DPO Network.

2. Evidence on the Cost of Disability in Ireland

Research on the Cost of Disability in Ireland demonstrates that Disabled people face significant additional costs to achieve the same standard of living as non-Disabled people. These costs arise across many areas of daily life, including healthcare, transport, education, communications, personal assistance, aids and appliances, and household expenses.

The Center for Inclusive Policy highlights that an inclusive social protection system should incorporate Disability assessments that accurately capture a Disabled person's access needs, reflect the diversity of Disability-related costs, and support the development of in-kind benefits to meet those needs - such as Personal Assistance, therapies, and medical expenses. Such systems should also eliminate harmful eligibility criteria, actively involve Disabled people in the design and production of social protection policies, and ensure that all processes, including applications, are fully accessible.

The Autistic community's experiences reveal that many Autistic adults and families find the current social protection system to be often exclusionary and inaccessible – particularly as they struggle to meet everyday expenses and encounter significant barriers in navigating the system. These barriers are compounded by additional costs related to being Autistic or raising an Autistic person, costs which can include assistive technology, therapies, specific "safe foods", or sensory items.

The scale of Disability-related costs borne by Autistic people and families is highlighted by research published by ATU Sligo researcher Dr Áine Roddy which estimated the costs of living or raising an Autistic person in Irish society. This research highlighted that costs can be as high as €28,464.89 per year. This chimes with the Department of Social Protection and Indecon Report on the Cost of Disability in Ireland, which established the significant additional cost of living that many Disabled people and Autistic people experience in Irish society. The report highlights that Disabled people have a substantially lower income compared to non-Disabled or neurotypical people, with many Disabled people receiving an annual income of less than €8,000 per year. The report also estimates that the average additional costs of living as a Disabled person in Irish society were around €11,734 per year. This included unmet needs of between €2,522 and €3,821 per year arising from having to pay for additional expenses related to their Disability.

Concerningly, a recent Report from the Irish Human Rights and Equality Commission and the ESRI (Economic and Social Research Institute), titled *'Adjusting Estimates of Poverty for the Cost of Disability'*, suggests that Ireland significantly underestimates the scale of poverty and social exclusion experienced by households with Autistic or Disabled people.

The Report asserts that Ireland underestimates the extent that additional Disability related costs can dramatically reduce the income and living standards of Autistic and Disabled people and families. Such financial pressures restrict autonomy, decision-making capacity and opportunities to realise rights under the UNCRPD. The Report highlighted that households with a Disabled family member need an income increase of between 52% and 59% to achieve the same standard of living as households with a non-Disabled family member. Coupled with inflation, additional costs related to Disability ranged between €488 and €555 per week (€25,376-€28,860 per year), significantly higher than the Indecon Cost of Disability Report. Moreover, it also states that for households with a family member with high support needs, they would need an income increase of 93% to achieve this same standard of living.

These findings demonstrate that Disability-related costs are substantial and cannot be met through existing social protection payments alone. They also demonstrate that Disability is strongly linked with poverty and financial hardship.

3. Evidence from the *Same Chance Report 2026*

AsIAm's *Same Chance Report 2026*, which featured responses from 1,676 Autistic people and families, provides important insight into the financial pressures faced by Autistic people and families in Ireland. The findings highlight the strong relationship between Disability, poverty, reduced employment opportunities, and increased living costs.

The Report found that:

- 93% of respondents believe that there are additional costs associated with being Autistic or raising an Autistic family member.
- 98% believe that a Cost of Disability payment should be introduced.

- 77% do not believe that the social protection system is accessible to Autistic people.
    - This represents a significant increase from 2025's report where 64% did not believe the social protection system is inclusive of Autistic people.
- 57% have not had any positive experiences in the workplace or while looking for work in the past 12 months.
- 69% do not believe that employers in Ireland are becoming more Autism accessible.

The report also found that many Autistic people and families rely on social protection supports but still experience financial hardship. Among respondents, 62% reported receiving Disability-related social protection payments, including Disability Allowance, Domiciliary Care Allowance and Carer's Allowance.

However, many respondents reported that current payment rates are not sufficient to meet their needs. Only a small proportion of respondents agreed that Disability payment rates were sufficient, while a majority reported that payments were not enough to meet the costs associated with Disability and daily living. This volatility of fixed incomes, such as Disability allowance, is exemplified by the current spikes in energy prices. These additional increased costs are pushing Disabled people into poverty. It is important for the Department to address this as an issue urgently, and as such it will be vital for any future Cost of Disability payment be reviewed against SILC (Survey on Income and Living Conditions) data as well as annual data from Vincentian MESL study on the minimum income required for an adequate standard of living.

Respondents to the Same Chance Report described a social protection system which is typically perceived as inaccessible, burdensome, and even distressing. A consistent theme was the complexity and emotional toll that applying for Disability social protection payments took on many Autistic people and families. One noted that: *"The form filling is endless — in a lot of cases the diagnosis alone is not enough, you have to prove the difficulties over and over again."* Another described the experience of DCA as: *"a horrific process, it literally traumatised me."*

Many also highlighted that the system appears to be designed to humiliate and retraumatise applicants rather than support them. As one respondent stated: *"Everything is a fight."* Others shared experiences where they felt upset or distressed by having their applications rejected on numerous occasions and having to appeal each time: *"DCA, ICC and various other supports seem to be automatically refused nowadays pending appeal — unnecessary distress for applicants/parents."* Having to be present in person, communicate to Department staff by phone, and navigating lengthy and complex applications posed barriers for the Autistic community, especially for those who felt they needed more support throughout the process:

The assessment process was perceived by many in our community as reflecting a deficit-based approach which had the effect of dehumanising Autistic people and families. One respondent captured this clearly: *"A deficit-based system — we cannot celebrate achievements; we need to highlight all the things they can't do. The Disability Allowance form is in no way suitable for an Autistic person."* Others noted the impossible position created by masking, particularly for high-masking Autistic people who may be able to conform to societal expectation but still need these supports: *"If you're seen as 'high functioning' you're immediately dismissed."* Concerns were also raised that misinformation and limited understanding of Autism within the system can lead to a minimisation of support needs, particularly where individuals do not fit narrow or stereotypical presentations. This reflects wider findings from the Same Chance Report 2026, where 68% of Autistic people and families reported that misinformation about Autism has increased, alongside strong concern that this misinformation contributes to stigma and misunderstanding of the needs of the Autistic community.

These findings demonstrate that existing supports do not adequately meet the Cost of Disability and that many Autistic people and families continue to experience financial hardship.

4. Types of Additional Costs Faced by Autistic People and Families

Autistic people and their families face additional costs across many aspects of life. These costs often arise because public services are unavailable, inaccessible, or insufficient, forcing families to pay privately for services and supports. Findings from the Same Chance Report highlight that many community members face an “Autism Tax” - by virtue of having a Disability, community members are punitively and unfairly burdened with additional costs, including private therapies, mental health and wellbeing support, sensory supports , clothing, equipment and transport, and having to frequently replace items vital to meeting their sensory needs.

Community members describe having consistently higher costs for food, clothing (sensory sensitivities requiring specific fabrics or frequent replacement), utilities (higher electricity usage from lights and technology), and equipment like noise-cancelling headphones, weighted blankets, and AAC (Augmentative and Alternative Communication) devices - “*Cost of items you may need, like ear defenders, noise cancelling headphones, tinted glasses, weighted blankets.*”. One respondent aptly captured our community’s experiences: *"There are just things we need to help our son be comfortable and everyone who is neurodivergent has these needs and they add significantly to the cost of living."* Another highlighted: *"Equipment that is required for sensory issues and other products that are specifically for [Autistic] people … always carry a very high price tag, more so than items for people without the need for such equipment.”*

One of the biggest costs cited by community members is meeting the cost of accessing therapeutic services, including speech and language therapy (SLT), occupational therapy (OT), play therapy, psychology, and physiotherapy. Respondents reported paying between €60 and €150 per session, often multiple times per week, because HSE waiting lists are long or services are simply not available locally. One community member shared that: *"We are paying the equivalent of a second mortgage accessing necessary therapies privately."* Another replied that: *"We have spent tens of thousands of our own money on speech and language therapy, music therapy, occupational therapy, physiotherapy, etc." Other respondent noted: "We currently spend €240 a week on providing supports just to try to level the playing field for our child",* whilst another reflected the scale of costs involved*: "We pay an SNA to take our son for 20 hours a week costing €300 every week... We pay an OT €750 a month... We pay a psychologist €600 a month... This is a lost income of around €70,000 a year."*

Food costs represent a significant portion of the Cost of Disability for Autistic people and families. Many Autistic people have sensory differences around food, including strong preferences for specific tastes, textures, and smells. Some Autistic people require consistency to their diet and as such, with the cost-of-living crisis we are currently living in, these particular types of foods can be costly. Costs relating to therapies, food and clothing are not optional costs for Autistic people and their families, they are necessities and vital to their wellbeing. Such costs cannot be avoided and add an unfair strain to already stretched personal and household budgets. A key test of any future Cost of Disability payment will be how well the payment bridges the gap induced by these essential daily costs, which push the financial limits of the Autistic community's income.

These costs must also be considered in the context of Ireland's obligations under the UN Convention on the Rights of Persons with Disabilities. The Convention places obligations on the State to ensure access to Healthcare (Article 25), habitation and rehabilitation services (Article 26), Education (Article 24), Work and Employment (Article 27), Adequate Standard of Living and Social Protection (Article 28), and Participation in Community life (Article 19).

Where public services are unavailable or inaccessible, Disabled people and families are often forced to pay privately to access essential services, pushing Autistic and Disabled people further into isolation and social exclusion in the process. This effectively shifts the Cost of Disability from the State to individuals and families. A recurring concern is that needs are often considered in isolation across different departments, resulting in a siloed approach to policy and service provision that fails to reflect the cumulative and interconnected nature of Disability-related costs. The Cost of Disability payment should therefore be understood not only as an income support measure but also as part of a cross-government response, aligned with the State's obligations under the UNCRPD to ensure Autistic and Disabled people's full and equal participation and secure an adequate standard of living.

Examples of additional costs identified by respondents to the Same Chance Report include:

- Private Autism assessments due to long waiting lists.
- Private speech and language therapy, occupational therapy and psychology services.
- Assistive technology and communication devices.
- Sensory supports, sensory equipment and specialised clothing.
- Higher heating and electricity costs.
- Specialist diets and health supports.
- School transport and education support.
- Legal and advocacy costs.
- Loss of income where a parent must reduce working hours or leave employment to provide care.
- Supports required to access employment or education.

Many respondents reported that there is limited access to public therapeutic supports available and that families must pay privately for therapies costing significant amounts per session. Others reported higher costs for sensory supports, clothing, household items and heating costs.

These examples demonstrate that the Cost of Disability extends far beyond medical costs and includes the broader costs of participation in education, employment, and community life.

The impact of the Cost of Disability is immediate and far-reaching for many Autistic people and families. These additional financial pressures result in persistent anxiety and hardship, often forcing Autistic people and families to make difficult choices between meeting everyday essentials and getting supports they need. Many Autistic people tell us that these costs prevent them from fully participating in education, employment, and community life, undermining their wellbeing and social inclusion. The scale of these financial costs means that many Autistic people experience loneliness and social exclusion as a direct consequence of being unable to afford or access these opportunities that support their wellbeing, inclusion and participation both in society and their wider communities.

This inequality was brought into sharp focus during the COVID-19 pandemic, when the Government introduced the Pandemic Unemployment Payment of €350 per week to protect workers who lost their jobs and were told to stay home during lockdown. Whilst this showed the State's ability to act swiftly and provide adequate income supports to those who need it, whereas Disabled people who rely on social protection supports did not see equivalent increases despite facing these additional costs and a greater risk of exclusion. For many in our community, this reinforced existing structural inequalities and deepened the perception that the needs of Autistic and Disabled people were consistently undervalued by our social protection system.

Crucially, introducing a Cost of Disability payment would not just support our community to secure an adequate income, but would also facilitate their fuller participation in society and the realisation of their social, economic, and cultural rights.

A Cost of Disability payment would also have a positive impact on the wider economy. Increased income supports would allow Autistic people and their families to spend more within their local communities on essential goods, services and supports, including with local businesses. This highlights the concept of the "Purple Pound", which is the spending power that Disabled people and households have across the UK. Evidence suggests that, considering that Disabled people comprise a significant proportion of our society, increasing income supports would be reinvested directly into their communities to increase economic activity, support employment, contribute to more sustainable and inclusive economic growth. Research estimates that the total spending power of Disabled households in the UK to be as high as £446 billion, and with businesses directly benefitting from making their products and services more available and accessible to Disabled people.

5. Employment, Income and Poverty Risk

The Cost of Disability must also be considered in the context of employment barriers and reduced income. The Same Chance Report found that only 45% of respondents reported being in paid employment, while a further group reported that they would like to work, but were unable to access employment opportunities. More starkly, the Autism in the Workplace Report also found that 85% of Autistic adults are unemployed or underemployed. Autism Europe suggests that the employment rate of Autistic people may be as low as 5-15%.

The most recent European Semester Country Report for Ireland published by the European Commission found that Ireland has one of the highest Disability employment gaps in the EU, with 38.2% of Disabled people experiencing unemployment or underemployment. The Commission identified barriers to accessing education, lack of access to reasonable accommodation in the workplace, and discrimination as key contributing factors. This stands in stark contrast to the Government's commitment under the Roadmap for Social Inclusion 2020–2025 to increase the employment rate of Disabled people to 33% by 2027.

The European Semester Report also highlighted that 30.1% of Disabled people were at risk of poverty and social exclusion, and that Disabled people were four times more likely than the general population to be unable to afford everyday goods. The Commission further expressed concern that Ireland's social protection system was not adequately compensating for the additional costs of Disability and that recent payment increases had not kept pace with inflation.

Similarly, the 2024 Survey on Income and Living Conditions (SILC) published by the Central Statistics Office found that 32.5% of Disabled people who were unable to work were at risk of poverty compared to 5.4% of Disabled people who were employed, and that almost one in five Disabled people of working age were living in deprivation and consistent poverty. The survey also found that without the one-off cost-of-living measures introduced in recent Budgets, 37.4% of Disabled people would be at risk of poverty. These findings are consistent with broader evidence showing that poverty rates among Disabled people are between 2.5 and 4 times the national average.

Reflecting this financial precarity, the European Commission noted that the main form of financial support, Disability Allowance, had not increased in line with inflation and that recent increases were insufficient to maintain purchasing power. In its analysis of Budget 2025, Social Justice Ireland also criticised the failure to introduce a dedicated Cost of Disability payment despite clear evidence of additional Disability-related costs. The organisation noted that if Disabled people are to be equal participants in society, the extra costs generated by Disability should not be borne by individuals and families alone and that progress on introducing a Cost of Disability payment is long overdue.

The Cost of Disability payment should therefore support greater participation in the labour market rather than create disincentives, and it should be available to Disabled people both in and out of employment. Autistic people face barriers in recruitment processes, workplace environments, and access to reasonable accommodations. These barriers result in lower employment rates and reduced income, while Disability-related costs remain high. This combination of reduced income and increased costs significantly increases the risk of poverty, and economic and social exclusion. In contrast, introducing a Cost of Disability payment would unlock opportunities for Autistic and Disabled people by directly addressing the Disability-related costs and supporting Autistic and Disabled people to accessing the jobs they want, and to remain and progress within their chosen careers.

Families caring for Autistic children also frequently reduce working hours or leave employment in order to attend appointments, manage education issues, and navigate systems and services, which are often complex, time-consuming, and stressful. This results in reduced household income at the same time as household costs increase. The Cost of Disability must therefore be understood as including both additional expenditures, and the loss of income experienced by Autistic people and families.

6. Principles for the Cost of Disability Payment

Government policy frameworks, including Pathways to Work, the National Disability Strategy, the National Human Rights Strategy for Disabled People, and the recommendations of the Joint Oireachtas Committee on Autism's Final Report, all emphasise the importance of increasing employment participation among Disabled people. However, employment policies must recognise that Disabled people face additional costs regardless of employment status and that employment alone does not remove the Cost of Disability.

The Cost of Disability Payment should therefore support employment participation rather than create disincentives, and it should be available to Disabled people both in and out of employment. Based on the evidence from national research and from the Same Chance Report 2026, AsIAm believes that the Cost of Disability payment should be designed according to three key principles.

1. The payment should recognise the additional costs associated with Disability rather than acting as a replacement for income supports. Disabled people face additional costs regardless of employment status and therefore the payment should be available to Disabled people both in and out of employment.
2. The payment should be accessible and should not involve overly complex or medicalised assessment processes. Many Autistic people experience difficulties navigating complex administrative systems and the application process must be accessible and straightforward.
3. The payment should also be part of a broader strategy to reduce the Cost of Disability through improved public services, including education, healthcare, housing, transport, and employment supports.

7. Participation, Leadership and Youth Voice

Autistic people's participation in decision-making, leadership and public policy development is essential to ensuring that policies reflect lived experience and are effective in practice. The principle of "*Nothing About Us, Without Us*" is central to Disability rights and to the implementation of the UN Convention on the Rights of Persons with Disabilities. However, evidence from AsIAm's Same Chance Report 2026 demonstrates that Autistic people continue to face significant barriers to participation in leadership, consultation, and decision-making processes.

Advocacy for Impact Group

As part of this submission, we consulted with members of AsIAm's Advocacy for Impact Working Group to get their thoughts and lived experiences of the Cost of Disability. This group is made up of members of our Autism Friendly Towns committees, local advocacy groups, and Autistic people. This working group is a broad coalition of people from diverse backgrounds. Members of this group have a unique on-the-ground experience of the Cost of Disability via their own experiences and the experiences of their fellow local community members. Their feedback on the Cost of Disability highlights such costs extends far beyond visible or direct expenses, encompassing significant hidden and systemic financial burdens. Members of this group consistently pointed to increased day-to-day living costs, including transport, healthcare, assistive supports, and energy usage, alongside reduced access to stable employment. Many Autistic people face additional financial strain due to the need for private services where public provision is insufficient or inaccessible. These overlapping pressures contribute to a persistent gap in financial security, with Disability-related costs often unavoidable and inadequately recognised in current supports. One member told us that the hidden Cost of Disability often includes the inability to reliably use public transport, as this can be overbearing, meaning families often have to drive Autistic young people and adults to college, appointments, and daily activities. Members of this group also highlighted that when a child turns 18, supports for parents are removed, yet the cost to the household do not disappear. A universal, needs-based Disability payment should recognise these realities and allow Autistic people to contribute towards the financial burden on their families.

Furthermore, members responses emphasise structural barriers that exacerbate these costs, including gaps in public service accessibility, limited availability of appropriate supports, and challenges in navigating systems. Issues such as communication barriers, including language accessibility, and the lack of inclusive service design further compound financial and social exclusion. Members from this group pointed to the lack of Irish language fluency across the healthcare service (assessments and therapies) compels families of Irish-speaking Autistic people to seek these services in the private sector at additional cost. The lack of professionals with Irish language fluency in the private sector only serves to increase these costs further, as families are left with little to no other option but to access these supports. Members highlighted that addressing the Cost of Disability requires not only financial measures but also systemic reform to ensure equitable access to services, reduce reliance on private expenditure, and promote meaningful inclusion in all aspects of daily life.

Youth Ambassadors

The Same Chance Report 2026 found that opportunities for Autistic people to participate in leadership and decision-making remain very limited. The survey found that 86% of respondents had not had any opportunities to take part in leadership roles in their local community, while 82% said they had not been involved in consultation or decision-making processes such as advisory groups, consultation panels or policy submissions.

These findings highlight a significant gap between the policy commitment to participation and the lived reality experienced by Autistic people and families. They also demonstrate the importance of initiatives such as AsIAm’s Youth Leadership Team and Youth Ambassadors programme, which provide opportunities for Autistic young people to develop leadership skills, contribute to policy discussions and share their experiences with decision-makers. During the drafting of this submission our ambassadors told us that it was important for the Cost of Disability payment to address:

- “Create accessible speech and language, therapeutic, and occupational therapy through the public system by reducing waiting times by using a hybrid booking system tailored to the individual.”
- “Provide more Disability services.”

- “Include basic therapy training for those studying education.”

8. Considerations when Designing a Cost of Disability Payment

A key consideration for the Department of Social Protection when designing a Cost of Disability Payment is how eligibility is determined, the level of Cost of Disability payments and how the payment would operate in practice. In previous submissions that AsIAm made to the Department, including on the Green Paper, we highlighted the Autistic community’s concerns around the medicalised and deficit-based nature of current assessment processes, and the anxiety and distress that this creates for Autistic people and families. Any eligibility framework for a Cost of Disability payment must learn from these shortcomings and be designed with the needs and everyday lived experiences of Autistic and Disabled people at its core.

Eligibility

AsIAm wishes to highlight that when the Department sets up the eligibility criteria for this payment, we believe that this needs to reflect that access to an official Autism diagnosis remains a significant barrier for many Autistic and Neurodivergent people. Long waiting lists within the public health system mean that many Autistic people and families are forced to incur substantial financial costs to secure a diagnosis and access supports privately. We would strongly advocate that the State address these structural barriers faced by our community, including financially supporting families accessing services and supports privately as an interim measure.

In the context of designing a Cost of Disability payment, AsIAm believes that the most practical approach is that any Autistic or Disabled person who can demonstrate additional living costs related to their Disability should be eligible. Eligibility should not be contingent on a narrow, deficit-based or medicalised definition of Disability. Instead, it should be rooted in Autistic and Disabled people’s lived experiences in these additional costs — including sensory supports, food, transport, assistive technology and equipment like noise-cancelling headphones or seamless or soft clothing — that Autistic and Disabled people and families face as a direct consequence of their Disability, difference or support needs.

Critically, the process of establishing eligibility must not replicate or reinforce the barriers that exist within the current system. Applying for a Cost of Disability payment must be simple, accessible and straightforward, and not subject Autistic people and families to significant delay. It should not be unnecessarily lengthy, intrusive, cause hardship or traumatise or stigmatise applicants. The Cost of Disability payment should be designed to be consistent with Universal Design principles, including the use of plain language, accessible formats, and the provision of appropriate supports for those who need assistance with the application process.

Determining the Amount of the Cost of Disability Payment

AsIAm believes that the level of the Cost of Disability payment should mainly be informed by evidence of the additional costs of Disability that Autistic and Disabled people face. During the initial assessment period, the Department may support applicants to provide documentation of these additional costs – such as sensory equipment, additional expenses, or evidence that speaks to the "Autism tax" that Autistic people experience – that shows the type of costs that Autistic people or families are experiences arising from being Autistic. This would allow the payment to reflect the additional financial pressures faced by our community, whilst also ensuring that the payment is universally available and accessible to Autistic people and families.

However, any documentation requested by the Department should be proportionate, flexible and offer applicants with multiple ways of submitting information or engaging with the process. The process should not be onerous or excessively burdensome or demanding in terms of what proof is needed. It also should not involve intrusive examination of the applicant's personal circumstances and or involve means testing, particularly if they are unrelated to these Disability-related costs.

AsIAm also believes that a Cost of Disability payment must not be means tested, particularly in a way that factors the income of a spouse or family member, or income accrued from employment or other forms not directly related to their difference, Disability or support needs. A person's joint income with their partner, or a person's own income from their job, does not diminish the additional costs they face as a Disabled person, or mean that they need fewer financial supports. Means testing would risk penalise Autistic and Disabled people in ways that affect their full and equal participation in Irish society that contravene with the UNCRPD.

How the Payment could work in Practice

AsIAm does not support a reimbursement-based system for a Cost of Disability payment where Autistic and Disabled people must continuously submit claims or reimbursement for each individual expenses, as occurs in some medical expense reimbursement schemes in other countries. Such a model would impose a continuous and significant administrative burden on Disabled people and their families, restrict uptake of the Cost of Disability across the Autistic and Disabled communities, and fail to provide the financial certainty and stability that the payment is intended to deliver.

Instead, AsIAm recommends that a regular payment be made in a manner similar to a personalised budget where Autistic and Disabled people that contributes to these costs and provides autonomy and the freedom to decide how they wish to meet these additional costs. This reflects the Swedish approach highlighted in our Green Paper submission, where this Cost of Disability is covered on a consistent, ongoing basis.

Any reassessment of the Cost of Disability payment should be limited in scope and should only occur to decide whether the financial support an Autistic or Disabled person receives reflects these Disability related costs. Reassessment must never be used to cast doubt on the person’s need for cost-of-Disability supports or nature or extent of their support needs. Our *Same Chance Report* shows the extent of anxiety, hardship and distress impacts Autistic and Disabled people experiences of navigating the social protection system particularly with having to continually make applications and appeals for Disability payments they desperately need.

9. Conclusion

The evidence from the Cost of Disability research, the AsIAm submissions to the Green Paper consultation and Pathways to Work the Same Chance Report 2026 demonstrates that Autistic people and their families face significant additional costs across all areas of life. These costs arise from both Disability-related needs and systemic barriers in accessing public services, education, employment and community life.

Research indicates that Disability-related costs may amount to tens of thousands of euros per year for some households and that households with high support needs may require significantly higher incomes to achieve the same standard of living as households without Disability-related costs. At the same time, Autistic people face lower employment rates and barriers to accessing social protection supports.

The introduction of a Cost of Disability payment is therefore necessary to reduce poverty, support participation in education and employment, and ensure that Autistic people and families are not financially disadvantaged because of Disability. It is vital that when looking at the cost of a Disability payment, the state looks at this through a holistic lens that encompasses everyday additional costs for Disabled people and families.

Recommendations

AsIAm recommends that Government:

- Introduce a permanent weekly Cost of Disability payment to recognise the additional costs faced by Disabled people.

  - This payment should be universal to all people with a diagnosed Disability, including Autistic people and the parents of Autistic children.
  - If introduced in Budget 2027, the payment should be €55 per week. According to the Parliamentary Budget Office (June 2025), this would be at a cost to the exchequer of €956 million.
- Ensure the Cost of Disability payment is not designed as a replacement for existing Disability income supports.
- Ensure Disabled people in employment remain eligible for the Cost of Disability payment.
- Include families caring for Disabled children within eligibility for the payment.
- Ensure the level of payment reflects the evidence on the actual Cost of Disability in Ireland covering additional costs such as education, assistive technology, therapeutic supports etc.
- Index the payment to the annual Vincentian MESL adequate income report.
- Ensure the application and assessment process is simple, accessible and not overly medicalised.
- Ensure the payment does not create poverty traps or disincentives to employment.
- Reduce waiting lists for Disability assessments and therapies to reduce private spending by families.
- Improve access to education supports, supported employment programmes, appropriate housing and accessible transport.
- Ensure Disabled Persons' Organisations and Autistic people, including young Autistic people, are involved in the design and implementation of the Cost of Disability payment.
- Continue research and data collection on the Cost of Disability in Ireland to inform future policy development.