Joint Committee on Autism - Request for Submissions

October 2022

# National Disability Authority

The National Disability Authority (NDA) is the independent statutory body with a duty to provide information and advice to the Government on policy and practice relevant to the lives of persons with disabilities, and to promote Universal Design.

The NDA welcomes this opportunity to input into the work of the Joint Committee on Autism. We welcome the opportunity to address the specific questions set out by the Joint Committee in its call for submission and to discuss how these issues relate to broader Irish disability policy and Ireland’s efforts to progressively realise the United National Convention on the Rights of Persons with Disabilities.

# Context – UNCRPD and Irish Government Policy on Disability

It is important to note the wider context within which the Joint Committee’s work is situated. The Department of Equality, Children, Disability, Integration and Youth is currently working on an Autism Innovation Strategy which may cover some of the areas identified by the Committee. The Department of Education and partners are still implementing some of the key recommendations of the NCSE’s Policy Advice Paper No. 6 – Comprehensive Review of the Special Needs Assistant Scheme: A New School Inclusion Model to Deliver the Right Supports at the Right Time to Students with Additional Care Needs (such as the new school Inclusion Model which potentially will have a significant impact on the educational provision and outcomes of children with autism[[1]](#footnote-1)) and the NCSE’s policy advice on special schools and special classes is due later this year. The HSE are currently piloting some of the key recommendations of the 2019 Report of the Review of the Irish Health Services for Individuals with Autism Spectrum Disorder.

In our advice to the Department of Equality, Children, Disability, Integration and Youth the NDA advised that it was important that the Autism Innovation Strategy should be framed within the United Nations Convention on the Rights of Persons with Disabilities and Ireland’s emerging arrangement to progressively realise its commitments under same. We also advised that due regard is given to Ireland’s existing Government policy on disability which has been based on mainstreaming and addressing access to services for all people with disabilities rather than different strategies for groups of people with particular disabilities.

We offered that advice for a number of reasons. Firstly, many people with autism also have other disabilities. It is estimated that between a third and a half of people who have autism also have an intellectual disability[[2]](#footnote-2). About 70% of children with autism are estimated to have a mental health co-morbidity[[3]](#footnote-3). The lifelong incidence of mental health difficulties among autistic individuals has been estimated to be as high as 80%[[4]](#footnote-4). Studies are also emerging of co-morbid disabilities for people with autism as they age[[5]](#footnote-5). Therefore, while it is without doubt that across many sectors there is a need to build capacity around autism awareness it is also important that those providing support or supporting access to a service have an understanding of autism but also have a broader understanding of disability.

Secondly, we advised that an autism specific strategy risked a move away from the social model of disability. In the social model of disability the focus is on removing the physical, social and attitudinal barriers which restrict people exercising their right to access services and living an ordinary life in the community regardless of their specific disability.

Finally, we advised that many Departments and state agencies who would have responsibilities under any new autism strategy would have similar implementation and reporting responsibilities under other disability related strategies including the National Disability Inclusion Strategy, Comprehensive Employment Strategy for People with Disabilities and the UNCRPD. Therefore, if an autism strategy or set of autism-focused policy is too far removed from the UNCRPD and Ireland’s existing Government policy on disability it risks resulting in duplication of effort and more reporting, perhaps diverting focus from implementation.

The above points notwithstanding, NDA acknowledges that there are improvements required across a range of public service areas to ensure that outcomes for autistic people are improved. However, we believe that it is important that the Joint Committee consider how actions to address shortcomings in public service delivery and / or supports for people with autism can be situated within the wider context of Ireland’s efforts to realise the obligations under the UNCRPD and Irish government policy on disability. For example, as will be argued in more detail below, the NDA advises that as the evidence base around built environment design considerations for people with autism develops, that that evidence should be incorporated into design guidance for how the built environment can be designed to improve accessibility for all people.

It may also be of interest for the Joint Committee to note that under the National Disability Inclusion Strategy there was a Programme of Actions on Autism developed (signed off by the Cabinet sub-committee on Social Policy in 2015). This Programme of Actions was developed based on research and policy / provision mapping and it was informed by consultation with autism stakeholders, including some consultation with adults with autism. The NDA was assigned a number of actions under the Programme of Actions on Autism. For example, we developed the following guidance targeted at sectors identified in the mapping and consultation:

* NDA (2018) Assisting People with Autism: Guidance for Justice Professionals
* NDA (2018) Assisting People with Autism: Guidance for Local Authority Housing Officers
* NDA (2018) Assisting People with Autism in Employment: Guidance for Line Managers and HR Professionals
* NDA (2017) Models of good practice in effectively supporting adults with autism

These guidance documents and other NDA publications on autism are available at <https://nda.ie/publications/disability-supports/autism/>

We believe that while the above documents did raise awareness of the issues around autism in some key sectors where there had been no previous guidance, we have no evidence about whether or not they have had lasting impact on how people with autism experienced engagement with organisations and professionals in those areas. Moreover, it is unclear whether progress was ever made on some of the other actions in the Programme of Actions on Autism by other named public bodies.

## Access to assessment and intervention

From our direct engagement with parents of children with disabilities on research projects and consultations the NDA is acutely aware of the distress that a delay in accessing support for a child with a disability can cause to parents. The research literature is clear that access to appropriate early intervention is important to improving outcomes for children with disabilities (including children with autism) and their families[[6]](#footnote-6).

The NDA acknowledges that the HSE, through the Progressing Disability Services programme, has sought to establish multi-disciplinary teams to deliver a family-centred support model of assessment and intervention, on an equitable basis across the country. The 91 Children’s Disability Network Teams are now all established, managers and team members have received induction and training, progress has been made in establishing a common IT system for all of the teams and on establishing a process to measure child and family outcomes. Since 2019, more than 475 development posts have been allocated to children’s disability services across the country. However, capacity issues, and vacancy rates in particular (the HSE indicated in March 2022 that the vacancy rate in CNDT teams was 25% on average), mean that significant challenges to meeting the demand for children’s disability services have persisted.

The Programme of Actions on Autism contained a commitment to evaluate the Progressing Disability Services model. The NDA understands that the evaluation was put off until the model was fully implemented. Now that there are Disability Network Teams are in place across the country the NDA advises that it would be appropriate to evaluate the Progressing Disability Services model to see how it is meeting the needs of all children with disabilities (including autism) and their families[[7]](#footnote-7).

Any evaluation of Progressing Disability Services is likely to show up that many of the Disability Network Teams do not have the capacity to meet demand, as noted above. The need for more therapists has been demonstrated by previous work by the NDA[[8]](#footnote-8), HSE with assistance from the NDA[[9]](#footnote-9) and the Department of Health[[10]](#footnote-10). The NDA understands that there is work being progressed by the Department of Health and the Department of Further and Higher Education to increase the supply of therapists. In addition to the supply issue it will be important that initial and ongoing training for therapists reflects the changed context of working with children with disabilities, including children with autism, so that therapists are comfortable working in inter-disciplinary teams and working indirectly with children through building family, teacher and early years professionals’ capacity.

In relation to autism assessment specifically, the NDA notes that the HSE has established an Autism Programme Board to progress the recommendations of the Report of the Review of the Irish Health Services for Individuals with Autism Spectrum Disorder. The HSE Autism Programme Board has established pilots in four Community Health Organisations to build capacity among key professionals and to test a model of assessment in 2022 with a view to establishing a consistent, standardised approach to autism assessment. Part of the model of assessment that is being piloted is a tired approach to assessment. The NDA understands that an evaluation of the pilot assessment approach will be published in early 2023. The more comprehensive evaluation of the overall Progressing Disability Services programme mentioned above could potentially build on the autism assessment evaluation.

## Issues with assessment of need

The challenges posed by Part 2 of the Disability Act have had a significant impact on the capacity of services to provide intervention to children with disabilities, including children with autism for a number of reasons. The NDA reviewed the operation of assessment of need under Part 2 of the Disability Act in 2011[[11]](#footnote-11). An important finding of that report was that clinicians felt that they lacked clarity on what was required of them when conducting assessments under Part 2 of the Act. The main recommendation of that report was that a means for providing clinicians with clarity on what constituted an assessment under the Act would need to be developed. While the HSE did subsequently develop a Standard Operating Procedure which sought to introduce an agreed model of assessment for assessments carried out under Part 2 of the Act, the issue has remained contentious.

Targeted investment of 7.8 million euros meant that significant progress was made in tackling Assessment of Need waiting lists (which had stood as high as 6,500 children waiting for an assessment of need under Part 2 of the Act in June 2020). However, a High Court decision earlier this year meant that 10,000 assessments carried out during this period using the preliminary team assessment in line with Standard Operating Procedure requirements may need to be conducted again.

It is clear that challenges related to operating Assessment of Need under the Disability Act have meant that many families have faced lengthy delays in receiving a diagnosis of Autism. A diagnosis is still required to access certain supports (for example Special Schools and Special Classes) and many parents feel that a diagnosis is very important to them to help them understand their child’s needs. More importantly these delays have meant that children with disabilities, including children with autism, have had delayed or reduced access to intervention.

The implications of recent court decisions mean that the challenges of conducting assessments (in line with the Court’s interpretation of the Act) within the statutory timeframes will potentially now be even more challenging. The NDA is concerned that the operation of Assessment of Need under the Act is contributing to delayed intervention for children despite the HSE’s efforts. It is important that available resources are used to ensure that children with disabilities including children with autism have timely access to clinically appropriate assessment and intervention. The NDA is of the view that Part 2 of the Disability Act should be reviewed (ideally in parallel to the current review of the EPSEN Act, 2004) to ensure that it is contributing to children accessing timely assessment and intervention.

## Education – including limited effectiveness of special classes to promote full inclusion

Recent years has seen a very steep rise in the number of special classes, many of them to meet the demand for special class places for children with autism. Since 2011 there has been 386% increase in the number of special classes. Of the 254 new primary special classes and the 130 new post-primary special classes that opened in September 2022 97% are “ASD special classes”. Despite this rapid increase in the number of special classes being opened, the introduction of 37A of the Education Act 1998 (as inserted by Section 8 of the Education (Admission to Schools) Act 2018), and improvements in the Department of Education and the NCSE’s process to estimate and plan for new special classes meeting demand has proved to be challenging in recent years[[12]](#footnote-12).

The rapid increase in special class places has taken place despite the absence of evidence (to either support or refute the position) that children with disabilities, including children with autism, have better social and education outcomes in mainstream or special classes. A 2017 review of the evidence on Irish special classes concluded that “students identified with disabilities and placed in separate education settings with varying degrees of integration with mainstream. Instead of inclusion, some of these classes are operating a model of exclusion which could be avoided with whole-school inclusive education policies and more effective resourced mainstream provision”[[13]](#footnote-13). The Department of Education Inspectorate review of special class educational provision for students with autism concluded that –

In the context of Ireland’s ratification of the UN Convention on the Rights of Persons with Disabilities (CRPD), and the possible implications of Section 24 (Part 2) in particular, it would be worthwhile for policy makers to examine if the current configuration of special classes is the most effective model to fully include all learners in school life. Specifically, if full inclusion or ultimate enrolment into mainstream classes is to be viewed as the index of success, the current system of special classes appears to be having limited success for many learners who enrol in a special class[[14]](#footnote-14).

The ratification of the UNCRPD, the forthcoming publication of the NCSE Policy Advice on the Future Role of Special School and Special Classes and the current review of the EPSEN Act mean that over the next few years there will be an opportunity to shape the vision of inclusive education policy in Ireland for coming decades. The NDA believe that that vision of inclusive education should seek to maximise the potential of children with disabilities (including children with autism) to progress through the education system with their peers, develop their independence skills and to move on to employment, further and higher education and training options that most suit them.

In relation to early years education the 3 year Evaluation of the Access and Inclusion Model (AIM) will be published in the coming months. It is likely to have some findings around children with autism in mainstream early education and care. The publication of the Evaluation will therefore prompt questions about the ongoing provision of (Department of Education funded) Early Intervention Classes and the remaining HSE funded special pre-schools (some of which children with autism attend). Therefore, there is likely to be a need for some work to be done to build autism knowledge and capacity among Early Education and Care professionals.

We note that in relation to higher education that the Higher Education Authority’s National Access Plan contained a Programme for Access to Higher Education (PATH) strand, this is the 4th such strand. Students with Disabilities and Autism in particular are a priority group in PATH 4. This strand will strengthen Universal Design for students in higher education institutions. With regard to autism in Higher Education Institutions the Autism Friendly University Design Guide[[15]](#footnote-15) provides practical strategies for making the built environment of Higher Education campuses more accessible to people with autism.[[16]](#footnote-16) The NDA advises that it will be important that the learning and outcomes of these projects are captured and used to inform considerations for how other parts of the education system could benefit for using a Universal Design approach to building capacity to include all learners but learners with autism in particular.

## Employment – including lack of employment supports

As there is no robust data on adults with autism and no clear pathway to a diagnosis for adults with autism there is no reliable data on employment rates for autistic people. In the UK only 16% of autistic adults are in full-time paid employment and only 32% are in some kind of paid work[[17]](#footnote-17).

The Government’s Comprehensive Employment Strategy for People with Disabilities covers autism in its definition of disability. The CES phase one Action Plan 2015-2017 contained two actions specific to people with autism but most of the actions refer to all people with disabilities, including people with autism.

In terms of making employment supports more accessible to people with autism the Department of Social Protection committed in 2019 to the rollout and provision of Autism Friendly Sensory Room’s across the Intreo Service in line with its commitments to provide all customers with equal access to quality services.

The NDA has developed a number of reports and guides in relation to employment supports for people with autism.

* [Supporting people with autism spectrum disorder (ASD) to obtain employment](https://nda.ie/Publications/Employment/Employment-Publications/Key-Learning-on-Employment-of-People-with-Disabilities/Supporting-people-with-autism-spectrum-disorder-ASD-to-obtain-employment/Supporting-people-with-autism-spectrum-disorder-ASD-to-obtain-employment/) (report of a 2012 seminar on employment supports for people with autism)|
* [Assisting People with Autism in Employment: Guidance for Line Managers and HR Professionals](https://nda.ie/Publications/Employment/Employment-Publications/Assisting-People-with-Autism-Guidance-for-Line-Managers-HR-Professionals.pdf) (this guidance 2018 was an action under the Comprehensive Employment Strategy)
* [Reasonable Accommodations for people with Autism Spectrum Disorder](https://nda.ie/nda-files/Reasonable-Accommodations-for-people-with-Autism-Spectrum-Disorder-June-20151.pdf) (this 2015 report covers advice on the provision of accommodations across a range of sectors rather than just workplaces).

The NDA published [Reasonable Accommodations: Obstacles and Opportunities to the Employment of Persons with a Disability](https://nda.ie/publications/employment/employment-publications/reasonable-accommodations-obstacles-and-opportunities-to-the-employment-of-persons-with-a-disability1.html) in 2019 which comprised of a literature review and a review of decisions from the Workplace Relations Commission and the Labour Court related to disability. This report found that there was an absence of cases by persons with intellectual disabilities and autism relating to reasonable accommodations despite the specific challenges that people with autism face in the workplace. The report recommended that further research was required to examine whether particular obstacles, which persons with a disability encounter in making employment equality claims and whether persons with certain types of disability (such as autism) encounter greater difficulties bringing employment equality claims.

## Adult Diagnosis – access and implications

The HSE Report of the Review of the Irish Health Services for Individuals with Autism Spectrum Disorders concluded that services for adults with autism were “minimal to non-existent in many countries” and that there is a need to provide “both a diagnostic service for adults with query ASD and ongoing supports that may sustain independent living and prevent referrals to specialist services”[[18]](#footnote-18).

Currently the option for adults who wish to access an autism diagnosis is to see a psychologist or psychiatrist privately. The cost of a private autism assessment is upwards of €850[[19]](#footnote-19). There are challenges around adult diagnosis as many of the autism diagnostic tools are more suitable for diagnosing children. However, there is some research setting out the benefits for adults of getting an autism diagnosis[[20]](#footnote-20).

Linked to the issue of poorly developed adult autism diagnostic capacity is the issue of data on adults with autism. There is no reliable data on prevalence of autism in adults in Ireland. The international estimated prevalence of autism in adults is 11 per 1000[[21]](#footnote-21). There is a need for better data for prevalence rates among adults specifically.

Many of the children who were diagnosed over the past three decades are now adults or approaching adulthood. This, along with the increase in adults seeking assessment/diagnosis means that there is going to an ever increasing need for autism-specific adult specific support services[[22]](#footnote-22). This includes support to transition from school into adulthood, support for entry into employment, and improved mental health services.

In relation to supports provided to adults with autism the NDA undertook a piece of research on service provision for adults with autism which looked at the support needs of adults with autism who did not have an intellectual disability[[23]](#footnote-23). While the report found that there was a lack of evidence around the optimal configuration of services and the most effective and efficient supports that are required to ensure that adults with autism without an intellectual disability can live as independent and fulfilling a life as possible it did highlight the need for such services to be developed. The report also highlighted the lack of a clear pathway to diagnosis and assessment for adults with autism. The paper advised that a pilot and evaluation of some of the models of service provision identified should be considered.

## Public buildings – the need for autism friendly buildings

## An accessible built environment is one in which the barriers to access by disabled people, including people with autism are removed or mitigated as far as possible. A Universal Design approach at planning stage can reduce the need for costly renovations at a later stage. The Centre for Excellence in Universal Design (CEUD) at the NDA has developed guidance for universally designed homes, places and facilities; early years learning and care settings; and the retrofit of long-term residential care settings among others.

## Universal Design is the design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible, by all people, regardless of their age, size, ability or disability. Accessibility is encompassed within Universal Design: if a universal design approach is applied from the outset, then accessibility becomes universal. This is reflected in Article 9 of the UNCRPD, and the UN Monitoring Committee’s General Comment 2.

## CEUD has produced a number of design guidance publications based on the available evidence on the needs of all people to access the built environment regardless of their age, size or ability, including our flagship built environment publication Building for Everyone: A Universal Design Approach[[24]](#footnote-24). These publications consider the needs of all persons regardless of their age or size and those who have any particular physical, sensory, mental health or intellectual ability or disability. The CEUD design guidance aims to inform designers achieving good design so that people can access, use, and understand the environment to the greatest extent and in the most independent and natural manner possible, without the need for adaptations or specialised solutions.

## In relation to the evidence around the built environment design considerations for autistic people a 2021 scoping review of literature on the design of autism friendly built environments found that where evidence existed it focused “almost exclusively on closed and devoted spaces”[[25]](#footnote-25). Most of the studies related to children’s educational settings and that there is a dearth of evidence on the needs of adults in relation to built environment design and a very limited evidence base in relation to the built environment beyond certain types of settings[[26]](#footnote-26).

The literature that does exist suggests that autistic people may have differences in processing sensory information and may find aspects of the built environment over-whelming and difficult to navigate. Emerging design guidance recommendations from this literature include the using simple spatial layouts, compartmentalising and zoning spaces into specific activity sections and providing retreat / quiet spaces[[27]](#footnote-27).

The NDA will continue to review the emerging literature on the specific needs of people with autism to ensure that all our built environment advice and guidance addresses specific design requirements of autistic people. We have had design professionals who have specialised in the needs of autistic people come and present to NDA staff and we will continue to engage with such experts. We will continue to ensure that we engage with people with autism in developing our design guidance.

The NDA supports the RIAI Universal Design Award to promote good practice in Universal Design among the architectural profession. In 2022, a house in Dublin was highly commended for the Universal Design Award. This house was designed for a family with a child with autism.

# Conclusion

The Department of Children, Equality, Disability, Integration and Youth have started the process of collaboratively developing a UNCRPD Implementation Strategy as a success to the current National Disability Inclusion Strategy that ends this year. There is an opportunity to address some of the issues that are a priority for autistic people through this strategy and through a mainstreaming approach.

The NDA is happy to engage with the Committee in relation to providing further detail on any of the above points.

1. Note on language – In 2022 the NDA has developed an Advice paper on Disability Language and Terminology. This paper was based on consultation with people with disabilities. In those consultations no universally agreed consensus on which terminology to use in relation to disability emerged. However, there are two main approaches which are commonly referenced both in the literature and in the consultation findings. These are often referred to as the ‘person-first’ approach and the ‘identity-first’ or ‘social model’ approach. Person-first language include terms such as ‘people with disabilities’, ‘person with autism’. This approach seeks to emphasise that a person is first and foremost a human being entitled to human rights. Person-first language is favoured by the UN and appears within the CRPD. However, it is not a universally accepted approach. The second common approach is often referred to as identity-first or social model language. Examples of this include terms such as ‘autistic person’. Proponents of this approach state that person-first language reflects a medical model understanding of disability in which a person’s impairment is seen as separate from the person, and therefore something to be fixed or cured. Identity-first or social model language instead seeks to emphasise that people are disabled by barriers in the environment and in society, rather than their impairment. The NDA recognises both person-first and identity-first/social model language and use both our documents. [↑](#footnote-ref-1)
2. Department of Health (2018) Estimating Prevalence of Autism Spectrum Disorders (ASD) in the Irish Population: A review of data sources and epidemiological studies. <https://assets.gov.ie/10707/ce1ca48714424c0ba4bb4c0ae2e510b2.pdf> [↑](#footnote-ref-2)
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6. Guralnick, M.J. (2005) **Early Intervention for Children with Intellectual Disabilities: Current Knowledge and Future Prospects**. Journal of Applied Research in Intellectual Disabilities. [↑](#footnote-ref-6)
7. Assessment of Need under the Disability Act, 2005 will be discussed further below. [↑](#footnote-ref-7)
8. NDA (2015) **Children’s Disability Services in Ireland**. https://nda.ie/publications/health/health-publications/children%E2%80%99s-disability-services-in-ireland.html [↑](#footnote-ref-8)
9. HSE (2018) **Transforming Lives - Working Group 1 Report on Future Needs for Disability Services**. https://www.gov.ie/en/publication/4b75a-transforming-lives-working-group-1-report-on-future-needs-for-disability-services/ [↑](#footnote-ref-9)
10. Department of Health (2021) **Disability Capacity Review to 2032 - A Review of Social Care Demand and Capacity Requirements to 2032**. https://www.gov.ie/pdf/154163/?page=1 [↑](#footnote-ref-10)
11. NDA (2011) **National Disability Authority Report on the Practice of Assessment of Need under Part 2 of the Disability Act 2005**. <https://nda.ie/nda-files/Report-on-the-Practice-of-Assessment-of-Need-under-Part-2-of-the-Disability-Act.pdf> [↑](#footnote-ref-11)
12. The Education (Provision In Respect of Children with Special Educational Needs) Act 2022 provides for a truncated Section 37A process and is intended to ensure that special classes places can be provided for in a shorter timeframe [↑](#footnote-ref-12)
13. Banks, J and McCoy, S. (2017) **An Irish Solution…? Questioning the Expansion of Special Classes in an Era of Inclusive Education**. The Economic and Social Review, Vol. 48, No. 4, Winter 2017, pp. 441-461. <https://www.esri.ie/system/files/media/file-uploads/2017-12/JA201754.pdf> [↑](#footnote-ref-13)
14. Department of Education and Skills (2020) **Educational provision for Learners with Autism Spectrum Disorder in Special Classes Attached to Mainstream Schools** <https://assets.gov.ie/75048/0e5a1e59-45e7-44c3-95be-ffb722d9bfe5.pdf> [↑](#footnote-ref-14)
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18. HSE (2019) **Report of the Review of the Irish Health Services for Individuals with Autism Spectrum Disorders**. <https://assets.gov.ie/10708/33f312f0421443bc967f4a5f7554b0dd.pdf> [↑](#footnote-ref-18)
19. <https://www.adultautism.ie/faqs#:~:text=How%20much%20does%20an%20assessment,ahead%20with%20the%20assessment%20afterwards> [↑](#footnote-ref-19)
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21. Bruagh, T. et al (2016) **Epidemiology of autism in adults across age groups and ability levels.** British Journal of Psychiatry. December;209(6):498-503. [↑](#footnote-ref-21)
22. Huang, Y., Arnold, S.R., Foley, K.R. and Trollor, J.N., 2020. Diagnosis of autism in adulthood: A scoping review. Autism, 24(6), pp.1311-1327. [↑](#footnote-ref-22)
23. NDA (2017) **Models of good Practice in Effectively Supporting the Needs of Adults with Autism, without a Concurrent Intellectual Disability, Living in the Community**. <https://nda.ie/file-upload/good-practice-in-supporting-adults-with-autism-2017.pdf> [↑](#footnote-ref-23)
24. NDA (2012) Building for Everyone: A Universal Design Approach. <https://nda.ie/publications/environment-housing/building-for-everyone/> [↑](#footnote-ref-24)
25. Tola, G. et al (2021) Built environment design and people with autism spectrum disorder (ASD): A scoping review. International journal of environmental research and public health, 18(6), p.3203. [↑](#footnote-ref-25)
26. Tola, G., et al (2021) op cit [↑](#footnote-ref-26)
27. Tola, G., et al (2021) op cit [↑](#footnote-ref-27)