



**Submission in response to the public consultation
on the NDIS Planning Framework**

14 October 2026

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1. About the Physical Disability Council of NSW (PDCN)

The Physical Disability Council of New South Wales (PDCN) is the peak advocacy organisation for people with physical disabilities in NSW. For over 30 years, PDCN has championed lived experience of physical disability, advocating for the benefits of accessibility and inclusion across government and business, driving systemic reform.

The community we represent includes those living with spinal cord injury, cerebral palsy, muscular dystrophy, multiple sclerosis and other degenerative conditions, people who are blind or have low vision, people who are Deaf or hard of hearing, a person with an amputation or limb difference, short stature, polio, paraplegia, quadriplegia, spina bifida, motor neurone disease, arthritis, Parkinson's disease, acquired brain injury, or someone who has suffered a stroke, chronic pain and autoimmune condition.

Most people with disabilities in Australia have a physical disability. In accordance with the Australian Bureau of Statistics there are approximately 5.5 million Australians (21.4% of the Australian population) living with a disability and over three-quarters (75.3 per cent) of the 5.5 million reported a physical disorder as their main condition¹.

Our 2024-2027 Strategy

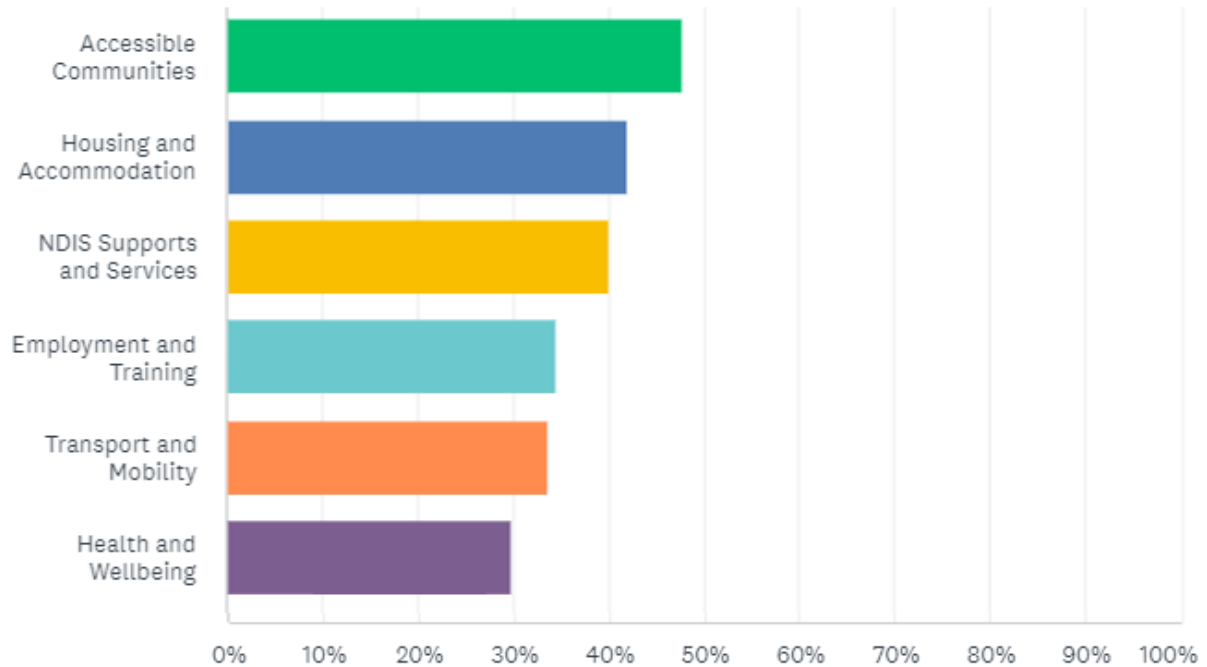
PDCN believes reform is most powerful when it is driven by lived experience. People living with physical disabilities are experts in the opportunities and barriers they face. By placing this expertise at the centre of our work, we are not only removing barriers to participation, but also creating value for the disability community, government, business, and wider Australian society.

Community-led Advocacy

To ensure our new strategy reflects the real needs of our community, PDCN undertook a comprehensive consultation process. More than 300 members of the physical disability community contributed through surveys and focus groups.

Participants identified six key advocacy priority areas for reform, as depicted in the bar graph below:

¹ Australian Bureau of Statistics (ABS) [Disability, Ageing and Carers, Australia](#): Summary of Findings, 2022 | Australian Bureau of Statistics (abs.gov.au) accessed 10 July 2024



1. **Accessible communities** – inclusively designed environments, products and services.
2. **Housing** – increased availability of accessible housing and accommodation.
3. **Physical Disability Supports: National Disability Insurance Scheme (NDIS) and Foundational Supports** – a stronger disability supports system that meets the needs of people with physical disabilities in NSW
4. **Employment and training** – fair access to meaningful work opportunities.
5. **Transport and mobility** – reliable, inclusive, and accessible public transport.
6. **Health and wellbeing** – equitable access to health services across NSW.

PDCN also convenes the NSW Disability Advocacy Network (NDAN), which is a network of 23 disability advocacy organisations across NSW. As a collective we advocate for people with physical disability, intellectual disability, psychosocial disability, people who are neurodiverse, have sensory disabilities, and disability intersectionality across First Nations, LGBTQIA+ and culturally and linguistically diverse communities. NDAN is funded by the NSW Department of Communities and Justice. Collectively we deliver systemic, representative and individual disability advocacy services across the state and represent people with disabilities in NSW at the national level.

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2. Introduction

The NDIS has significantly improved the lives of people with physical disabilities in Australia. Prior to the introduction of the scheme, many people with physical disabilities reported they felt that they had little control over their lives or opportunities to be independent. As a result of NDIS supports, many people with severe physical disabilities have much more choice and control over their lives, are able to participate in the community and employment, and have the power to decide who provides the supports they need. PDCN surveyed people with physical disabilities in September 2026 and found that 44% of respondents said that their experience accessing support through the NDIS has been ‘good’ or ‘excellent’.

“My supports enable me to be more independent, feel safe, and be capable of working, engaging in my community, and living the life I choose. They help me handle the practical effects of my disability and allow me to contribute to my family, work, and community.”

PDCN member living with neurological disability and carer of a person with disability

“The NDIS allows me to feel connected to community and supports my self-esteem through employment supports and engaging with individuals and practitioners who provide support and help I need.”

PDCN member with a spinal cord injury who lives in regional NSW

However, people with physical disabilities remain underrepresented in the NDIS, while PDCN continues to hear from people with severe physical disabilities who are unable to access the supports they need. Despite most people with disabilities in Australia having a physical disability (75.3%), people with physical disabilities are currently underrepresented on the NDIS. According to the NDIS quarter 3 FY2025-26 data report, only 156,454 (20.2%) of NDIS Participants are people with physical disabilities². These experiences include being unable to live safely at home, maintain personal care to prevent secondary health complications, and exercise choice and control over daily life.

PDCN supports the intention of ensuring the NDIS is sustainable into the future. However, reform must not come at the expense of the Scheme’s original intent: ensuring people with severe disabilities can access the supports they need.

² <https://dataresearch.ndis.gov.au/explore-data>

3. Executive summary

The NDIS has had a transformative impact on the lives of people with physical disabilities in NSW. Drawing on member surveys, community consultations and case studies, PDCN has identified barriers within the current planning and support rules framework and the proposed new framework planning process that risk limiting access to critical supports for people with severe physical disabilities. This submission recommends changes to ensure the new framework delivers fair, consistent and evidence-informed planning decisions.

The new planning framework must not create a standardised assessment and budget allocation system that systematically underestimates the needs of people with severe, permanent, progressive or fluctuating physical disabilities. The supports needs assessment process must accurately capture the full extent to which a person with severe physical disabilities requires supports. PDCN members raised concerns about assessors' disability expertise, inaccessible assessment processes and delays in decision-making. PDCN recommends that National Disability Insurance Agency (NDIA) assessors be appropriately trained and qualified to assess different physical disabilities, with assessments offering face-to-face and in-home options. There must be stronger accountability and escalation processes when the NDIA misses deadlines.

PDCN welcomes the intent to calculate funding for supports in a more consistent and transparent manner. However, people with severe physical disabilities have told us that the new budget method rules must maintain participants' choice and control. The usability, longevity and functionality of the approved support must be considered instead of being based on the cheapest option, particularly where this may lead to unsuitable supports.

The proposed new plan variation and reassessment process is an opportunity to improve participant outcomes, but only if this new process effectively addresses the concerns people with severe physical disabilities have in the current framework. PDCN strongly recommends that the assumption of ongoing informal supports should not be used to determine disability support needs. Plan variations and reassessments must be timely, flexible and responsive to changing support needs and costs, particularly for people with complex, fluctuating or episodic conditions.

PDCN also recommends that the NDIA separately fund any assessments or reports it requires when a participant requests a plan variation or reassessment. Participants should not have to pay for these using their existing plan funds, as this could reduce the funding available for their essential supports and discourage people with severe physical disabilities from seeking a review of their plan when their needs change.



Efforts to simplify NDIS Supports rules should not result in unintended loss of supports or confusion about how support categories align with budget line items. PDCN recommends safeguards that protect continuity of existing supports and effectively guide participants through the transition. Finally, the agency must ensure support rules are reviewed annually with people with physical disabilities and disability advocates to ensure they remain relevant to participants' needs, emerging technologies and innovative supports.

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4. Support needs assessment rules

PDCN supports the implementation of a fair, accurate, and accessible support needs assessment process that captures the full extent to which a person with severe physical disabilities requires supports. It is essential that NDIA staff undertaking assessments and making support decisions are appropriately trained. Support needs assessments must also offer face-to-face and in-home options. In addition, the NDIA must provide clear timelines for support needs assessment reports following an assessment.

Feedback from the NSW physical disability community

4.1 NDIA Assessors must have appropriate training and qualifications

Section 32L 8(b) of the NDIS Act 2013 (Cth) gives the NDIS Minister the power to determine the requirements for undertaking assessments. The consultation material states that “A support needs assessment is a guided conversation between a NDIS participant and a trained, accredited NDIA assessor.” It is essential during the assessment process that NDIA assessors have appropriate knowledge of varying disabilities to make decisions about a person’s support needs. However, there is little clarity to-date on what qualifications are required or training is involved for these assessors.

PDCN has heard from people with severe physical disabilities through member calls and a survey of NDIS participants conducted in August 2026, that previous plan determinations have been conducted by NDIS staff who had limited understanding of the person and their disability. This has in some cases left people with supports that do not suit their needs, and in most cases, a poor experience in accessing support. This can result in people with severe physical disabilities having little confidence in the fairness of NDIS processes.

“My son waited six months for a change of circumstances application to be reviewed. The planner was inexperienced, lacked training, had incorrect information, and did not understand the process or evidence requirements, including the OT [occupational therapy] evidence provided. This gave me a sense of disrespect and increased the administrative burden. The process did not feel as though it was helping my son become more independent.”

Case study - PDCN member (Member call, 2026)

To address this, under the new framework, NDIA assessors must have a good understanding of the complexity of different severe physical disabilities, especially degenerative and dynamic disabilities that will change or fluctuate over time. A survey conducted by PDCN in July 2025 found that across the entire disability support landscape, only 34% of respondents felt that their current supports met their needs. A further 44% of respondents felt there were no disability supports available to them outside of the NDIS. This highlights the significant reliance of people with physical disabilities on the NDIS to access support. Decisions must be made by assessors who understand participants' functional capacity and the supports they require.

"The lack of knowledge of the NDIS planner who was discussing how my supports were to build my independence and then be reduced, when I have a deteriorating neurological condition that will require intensive supports as my condition progresses...showed she had not read any of the reports that has been provided with the application at a significant personal cost."

Case study – woman living with a neurological disability (PDCN NDIS Survey, 2026)

Considering the poor experiences that people with severe physical disabilities have reported with NDIS assessors, training materials and qualification requirements should be developed in consultation with healthcare stakeholders, the disability advocacy sector and people with physical disabilities. Training should be tested and evaluated by people with a range of impairments to ensure it adequately prepares assessors to understand different needs and make accurate, consistent and evidence-informed decisions. This would help ensure assessments are respectful, uphold participants' dignity and result in appropriate support decisions.

4.2 Support needs assessments must offer face-to-face and in home options

The proposed support needs assessment states that a *"participant will meet with an NDIA assessor to talk about: Their day-to-day life, the support they need, what is important to them."* However, there is no mention of how this discussion will take place, in what format or location. PDCN members have expressed that they have had poor experiences with the NDIA making decisions about their plan and supports. People with physical disabilities have also reported that decisions are sometimes made without appropriate consultation with the participant, and the participant in some instances, has not been seen in-person by an NDIA representative for years.

“It’s been 7 years since I have been seen face-to-face by anyone at NDIS. Decisions are made remotely by someone who has no idea of my situation and even when detailed reports are provided, it seems they are not read and not given any credence.”

Case Study – Man who is Deaf & vision impaired (PDCN NDIS Survey, 2026)

For some people with physical disabilities, it is a requirement to meet face-to-face to understand the decision-making process. For those who have poor digital literacy or communication difficulties, not being able to meet in person can be a barrier to attending an assessment. It is also important that an option is given for meetings related to support needs assessments to be conducted as an in-home assessment, as many people with severe physical disabilities have difficulty leaving their home, or cannot access an NDIS office due to geographical or mobility constraints. This has been a continued concern raised by people with severe physical disabilities, and this specific concern was raised by NSW representatives of people with muscular dystrophy and spinal cord injuries in September and October 2026.³ The NDIA must clarify how support needs assessments will be conducted. Options for face-to-face meetings and in-home assessments must be provided to ensure people with physical disabilities are not excluded from the functional capacity assessment process.

4.3 Reports must be completed within clear timelines

The consultation paper states that *“the [support needs assessment] report must be completed as soon as possible after the support needs assessment.”* This is not an appropriate expected timeframe. It is essential for transparency that there are clear timelines given for the completion of reports and decision-making processes. This lack of transparency and adherence to timelines has resulted in frustrating experiences and poor management of participant expectations, with participants losing confidence in the NDIA’s ability to deliver effective supports.

“There is often a failure to act committed by the NDIS with long time frames between responses, items such as plan reviews, variations, not actioned and then having to be resubmitted, despite the original requests.”

Case study – Carer of a person with disabilities (PDCN NDIS Survey, 2026)

³ From representatives of Muscular Dystrophy NSW in a NDIS Rules Group meeting in September 2026 and Spinal Cord Injuries Australia in a NSW Disability Advocacy Network meeting in October 2026

People with severe physical disabilities have told PDCN that they do not trust that the NDIA will stick to timelines in decision making processes. Also, in the NDIA 2025/26 Q4 Report⁴, the section on the participant service guarantee found that the NDIA only responded to 44% of requests for plan variations⁵ within established NDIS timelines. While this is not in reference to support needs assessments, it sets a poor precedent for the NDIA being able to meet its own deadlines. For many people living with severe physical disabilities, the supports they receive through the NDIS have had a positive transformational impact on their lives and increased their independence. Issues with the planning process are a hindrance to this, however with unclear timelines highlighted as an area that is in dire need of improvement.

“The NDIS has significantly enhanced my independence, participation, and quality of life. When functioning effectively, it provides people with disability the support and confidence to lead ordinary lives, work, contribute, and stay engaged with their communities. However, understanding the Scheme can often be complicated and draining. [...] Improving consistency, communication, and decision-making timeliness would greatly enhance the experience for participants.”

Case study – Man living with a neurological disability (PDCN NDIS Survey, 2026)

It is essential that people with physical disabilities trying to access support through the NDIS are given full transparency of the timelines relating to accessing their support. Having clear timelines and performance targets for the NDIA in releasing reports of support needs assessments is a baseline of good practice and provides participants with trust that the NDIA will support them and manage expectations. It will provide participants with a clear indication of how long they will need to wait to access supports through the NDIS, enabling them to prepare for the interim with a tangible view to when they can receive an outcome.

Recommendations

Recommendation 1: The new Planning Framework must enable people with severe physical disabilities, particularly those with complex or dynamic support needs, to accurately demonstrate their functional capacity and secure funding that reflects their actual support needs. Clear guidance and safeguards must prevent changes to assessment and planning processes from resulting in inadequate funding, delays or interruptions to essential supports.

⁴ NDIS (2026), ‘Quarterly report to disability ministers Q4 2025-26 Full Report’, *Quarterly Reports*, 26 August 2026 <<https://www.ndis.gov.au/publications/quarterly-reports>>

⁵ ‘Ibid. to amend a plan after the receipt of information that triggers the plan amendment process’

Recommendation 2: Training materials and qualifications for assessors undertaking the support needs assessment should be high quality, consistent and tested for quality assurance with the disability sector and people with physical disabilities. This will ensure assessors have the knowledge and tools to make accurate, consistent and evidence-informed decisions.

Recommendation 3: Clarify the format through which support needs assessments will take place in relation to Section 32L(2) of the NDIS Act 2013 (Cth) and ensure that a face-to-face option is provided, including the option for in-home assessments to ensure people with severe physical disabilities are not excluded from the assessment process.

Recommendation 4: Amend Section 32L(6A) of the NDIS Act 2013 (Cth) to establish clear timelines and performance targets for completing reports following supports needs assessments to ensure timely delivery, accountability and transparency for participants.

5. Budget method rules

PDCN supports the principle of a sustainable NDIS and recognises the need for consistent and transparent funding calculation as part of building a plan. However, this must not come at the expense of appropriate supports for people with severe physical disabilities. As part of building a plan, budget decisions must consider the most effective and fit-for-purpose option for each participant, including how they source evidence of support costs. Budget allocation decisions must not be made based on what is the cheapest option alone and must consider the best value option for the person with disability who is being supported overall.

Feedback from the NSW physical disability community

5.1 Budget allocations and approvals must prioritise suitability and value, not cost alone

There no clarity to-date as to the details of budget method calculations that will underpin the funding amounts as referenced in S32K (1A) of the NDIS Act 2013 (Cth). This is concerning, as we have been informed by people with severe physical disabilities that funding reductions are already taking place. With the focus on reducing the cost of the scheme and sustainability measures, it is essential that the impact of the budget method rules does not withdraw critical supports from people with severe physical disabilities, for whom the Scheme was intended. This means that in deciding budgets, the participant's experience, quality of supports, and ensuring that the support is fit for purpose must be essential considerations. The decision must not be made based on cost alone.

"2 years ago, they [the NDIA] knocked back a request for a bathroom renovation that is needed for the times I am in a wheelchair on the basis that I should have bought a fully accessible home & did not look at low-cost options such as grab rails. The issue is that, due to the way the house is built, I can't get the chair through the doorway; grab rails won't help that. The chair fits through every other doorway in the house. Having had a disability since my early twenties, I have never been able to work enough to have enough money to buy anything fully accessible."

Case study – woman living with a spinal cord injury (PDCN NDIS Survey, 2026)

"The NDIA paid for a wheelchair without even confirming with me [...] it was not fit for my needs, and I ended up buying another frame myself."

Case study – woman with physical disability (PDCN NDIS Survey, 2026)

When deciding budget allocations for support categories, the NDIA must consider the most effective fit-for-purpose option for the participant. This decision must be based on the circumstances of the individual, considering the useability, longevity and functionality of the support in their daily life. This will ensure that supports that are provided are of a high quality and appropriate to the participant's needs. This would mean less risk that the support will not suit the person or will need to be quickly replaced, potentially increasing long-term participant and NDIA costs. It is critical that the decision not be made based on what is the cheapest option alone, but what is most suitable for the participant seeking the support. The practical execution of determining budget allocations must consider suitable supports in line with the legislation.

5.2 Quote requirements must not disadvantage people with severe physical disabilities in thin markets

The consultation material states that *"Some of the approaches that will be used [to determine allocated budgets] include; using quotes, set funding levels, or an estimate of the hours of support required to meet the need."* While quotes can help establish the cost of a support, PDCN is concerned that the requirement to secure multiple quotes could create barriers for participants who have limited access to providers.

In thin markets, participants may have few realistic options for obtaining quotes, regardless of their efforts to do so. For people with physical disabilities, assistive technology and other supports can be highly specialised and critical to safety and independence. In regional and rural parts of NSW, people with physical disabilities and providers highlighted to PDCN that participants experience limited provider availability, long waiting lists and difficulties accessing services. This issue was raised by NSW disability advocates at the NSW Department of Communities and Justice NDIS Consultation Rules Group in March 2026. A key discussion item was whether this rule was practical for people living in regional and rural areas. Thin NDIS markets in these areas can make obtaining multiple quotes challenging or even impossible in some cases.

"The population has increased but services have not, GP waiting lists are full, and people cannot get a doctor. When you get into a potential GP the waitlist is so long you are rushed in and out."

Case study – woman with disability, Albury NSW (2025)

If obtaining multiple quotes becomes a standard requirement, people with physical disabilities who live in areas with thin markets could face delays in accessing supports because alternative providers are not available. Additionally, there is risk that doing this could prioritise cost over suitability and undermine established clinical and provider relationships, who often have an in-depth understanding of participant support needs. Requiring participants to seek alternative quotes where suitable providers are not available may add administrative burdens without improving value for money.

The NDIA must ensure that obtaining quotes remains one option for determining the reasonable cost of a support and ensure this does not become a mandatory requirement. As an alternative to providing multiple quotes, where there are genuine barriers to sourcing multiple quotes, the agency must allow participants to provide replacement evidence. This could include a single quote, previous invoices, or published rates for the requested support where appropriate. People with physical disabilities should not experience delays in accessing supports because their local market cannot provide multiple quotes.

Recommendations

Recommendation 5: As part of building a plan and when deciding budget allocations for categories of stated supports in relation to S32K (1A) of the NDIS Act 2013 (Cth), the NDIA must consider what is the most effective and fit-for-purpose option for the participant. The decision must not be made based on what is the cheapest option alone but with consideration of individual circumstances and the usability, longevity and functionality of the support in their daily life.

Recommendation 6: Ensure that obtaining quotes remains one option for determining the reasonable cost of a support and does not become a mandatory requirement as part of building a plan. Safeguards must ensure that in thin markets, participants' geographical and financial constraints do not prevent them from obtaining evidence of support costs.

6. Plan variations and reassessments

Plan variation and reassessment processes must be clear, accessible and able to respond to participants' changing support needs while maintaining the continuity of essential disability related supports. Delays and gaps in funding can lead to people with severe physical disabilities experiencing mobility, independence and safety concerns. Feedback from the NSW physical disability community has identified four areas that require safeguards: the cost of obtaining evidence, delays and accountability, flexibility when needs or costs change, and the risk of underestimating support needs by assuming informal supports are available.

Feedback from the NSW physical disability community

6.1 The cost of plan variations and uncertainty about existing funding must not deter participants from seeking changes

During a consultation at PDCN's Central Coast Provider Session in April 2026, we heard concerns from an allied health provider about the cost of obtaining assessments and specialised reports when going through the reassessment process. These costs use funding intended for a participant's disability supports, discouraging participants from seeking changes when their existing supports no longer meet their needs. Where the NDIA requires additional evidence to determine a plan variation or reassessment, participants should not face an unreasonable financial barrier to providing it. The NDIA should fund required assessments or reports separately. Providers also reported that several of their clients have been reluctant to request a plan variation or reassessment, even though their current supports are inadequate, due to concerns this could lead to a loss of existing funding. The uncertainty around this process is discouraging some participants from seeking adjustments that better reflect their needs.

6.2 The plan variation and reassessment process must have clear timeframes and escalation pathways

Delays in approving variations can prevent people with severe physical disabilities from accessing disability supports and place their safety and independence at risk. A PDCN member who requested funding for a replacement mobility scooter in January 2025 was advised that a response should be provided within 21 days. Despite the participant contacting the NDIA three times, they received no response until 65 days and was told that *“your request is at the bottom of the list, and you have to wait your turn.”* The participant then complained to the NDIS Quality and Safeguards Commission. She reported being advised to spend money from her existing plan to escalate the request and obtain a decision sooner. This meant taking funding away from other ongoing disability related supports while she waited for approval. This experience highlights how delays, unclear processes and inadequate escalation pathways can force participants to make difficult decisions about which supports they can afford to maintain.

Under changes commencing 27 August 2026, once the NDIA has received all required information and evidence, it must decide within 90 days whether to reassess a plan, decline reassessment or vary the plan. However, there is no specified timeframe for acknowledging requests or advising participants that further evidence is required. Without clear evidence requirements and escalation pathways, the 90-day period could be delayed while participants wait for confirmation that their applications are complete, leaving them without essential supports and exposing them to avoidable safety risks. The NDIA must publish accessible information clarifying the timeframes for each type of variation and reassessment, provide status updates, and establish clear escalation pathways when deadlines are missed. Participants should be able to track the progress of their requests and seek action when a deadline is exceeded.

6.3 Plan variation and reassessment processes must be flexible enough to respond to changing needs and reasonable cost increases

People with physical disabilities can experience changes in their functional capacity or require additional supports because of changes in their circumstances. Disability supports may also cost more than initially estimated, especially when inflationary pressures affect services or modifications.

Home modifications are often essential to enabling a person to move safely around their home and maintain independence. A PDCN member with a spinal cord injury who attended a community consultation in Western Sydney in November 2025 reported experiencing difficulties securing funding for an essential home modification following a change in circumstances. Despite an urgent unforeseeable need for these modifications, the participant struggled to navigate the reassessment process to access funding after exceeding the budget allocated to the relevant support category. When a modification becomes necessary following a change in circumstances or where building and labour costs increase due to inflationary pressures, participants need a practical way to seek additional funding. Without this flexibility, people with severe physical disabilities may be left unable to access an essential modification or support required for daily living or independence.

PDCN welcomes the introduction of more flexible funding arrangements across certain budget support categories and the introduction of the plan variation pathway. However, both processes must be able to respond to genuine changes to support needs and reasonable increases in the cost of delivering approved supports. The NDIA should establish a clear, timely process for considering additional funding when essential costs exceed initial estimates. Budget flexibility is necessary to keep approved supports accessible when support needs and the cost of meeting them change, rather than leaving participants exposed to funding shortfalls.

6.4 Plan assessments must not underestimate support needs by assuming ongoing availability of informal supports

Plan reassessments and variations must determine the required disability support needs of participants without assuming that informal supports are available or ongoing. If informal supports are assumed, the participant's support needs may be underestimated. This can lead to inadequate or unsustainable support arrangements, particularly for people with complex or fluctuating impairments. At a PDCN community consultation in Western Sydney in September 2025, a parent of a child with severe physical and intellectual disabilities raised concerns that the reassessment process had not adequately recognised their son's disability related support needs. The child experiences episodic decline in capacity and unpredictable behaviour that makes it difficult for the child to participate safely within the community. The parent also raised concerns that family and cultural supports may not always be available and should not be relied on as a substitute for the supports their son requires. The parent stated that the variation or reassessment process needs to be:

"Individualised, culturally responsive with stable 24/7 supports, skilled workers, safe community-access strategies and long-term accommodation and transition planning that does not depend on ongoing family care."

Case Study - PDCN Community Member (Community Consultation in 2025)

Placing greater reliance on informal supports through NDIS plan reductions may bolster scheme sustainability but will have flow-on cost implications to participants, families, governments and the economy. When essential supports are not available for people with physical disabilities, parents and carers may have to reduce their hours or leave paid employment, resulting not only in lost productivity, but also lower household incomes and reduced tax revenue. The productivity Commission's 2023 inquiry into unpaid carer leave cited Deloitte Access Economics' estimate that foregone earnings associated with informal care totalled \$15.2 billion annually, equivalent to 0.8% of GDP⁶. This opportunity cost is projected to reach \$18.7 billion by 2030 as demand for informal care grows. Therefore, relying on families to fill gaps in essential supports does not eliminate costs, it merely transfers them to carers, employers and the wider economy.

Recommendations

Recommendation 7: Publish accessible information setting out clear timeframes for each variation and reassessment pathway, including for the NDIA to acknowledge requests within a specific period relative to the receipt of the request, provide status updates and establish escalation processes when deadlines are missed. Participants must receive clear information about how a variation or reassessment may affect their existing funding, with safeguards to prevent unnecessary disruption to disability related supports while a decision is pending.

Recommendation 8: Establish clear and proportionate requirements for evidence used in plan variations and reassessments. The NDIA should explain what evidence is required and why. Where the NDIA requires additional assessments or reports, these must be funded separately by the NDIA and must not reduce the participant's funding for disability related supports.

⁶ Deloitte Access Economics (2020), The Value of Informal Care in 2020, report commissioned by Carers Australia.

Recommendation 9: Ensure that funding decisions for plan variations and reassessments reflect the actual and reasonable market costs of equivalent supports and services. This should include accounting for inflation over the duration of plan, particularly for significant accessibility related works. Where the cost of an essential support costs more than the initial estimate because of a change in circumstances or reasonable price increases, participants should have access to a clear and timely process to seek additional funding.

Recommendation 10: The plan reassessment and variation processes should prohibit determinations of disability-related support needs relying on assumptions about informal supports continuing to be available. This is particularly important for people with complex, fluctuating or episodic physical disabilities.

7 NDIS supports rules

PDCN welcomes the intention to simplify the support rules by making the Rules easier to understand and use and help participants understand what supports are available. However, simplification must not reduce access to supports that people with severe physical disabilities need to maintain their independence, safety and participation in the community. The rules must also remain responsive to new technologies and emerging supports. PDCN is concerned that reducing the number of support categories from 36 to 18 could create uncertainty about how existing supports will be funded and which disability supports will continue to be available. The transition must be clear and transparent, with safeguards minimising loss of supports for people with severe physical disabilities and remaining flexible to allow participants to access new supports as they are developed.

Feedback from the NSW physical disability community

7.1 The transition to new support categories must protect disability supports for people with severe physical disabilities

PDCN welcomes the introduction of the plan variation pathway for people with severe physical disabilities to request urgent variations to their supports. PDCN also acknowledges that the consultation paper includes a table showing how the existing 36 support categories align with the proposed 18 categories. However, participants also need clear guidance on how these changes will affect their individual plans, funding arrangements and ability to continue accessing the supports they require. A PDCN member with cerebral palsy contacted PDCN in July 2024, and reported that he was unsure how the emergency funding was to be allocated across his budget or how his ongoing support needs would be met:

"I have severe cerebral palsy and applied for urgent funding for daily assistance so I can get out of bed, bathe and get dressed. Emergency funding of \$1000 was provided however there was no explanation of how my ongoing supports would be met. There was also no effective back up mechanism [for] when my allocated funding is finished or runs out."

Case Study – PDCN Member Call 2024

This case demonstrates the importance of clarifying the purpose and conditions of funding, especially when a participant needs urgent help with essential daily activities. If participants do not understand how they can use their funding, they may be unable to access the support they need.

The transition to new categories must not introduce further uncertainty or barriers to accessing supports. Participants should receive clear guidance explaining how supports funded under the existing framework will be recognised under the new categories, including examples relevant to people with complex physical disabilities. This will enable participants to understand how funding decisions will translate into practical access to the supports they need. The NDIA must ensure that approved funds are allocated to the correct support categories and that the participant is clearly informed about how the funding can be used.

7.2 Support rules must accommodate changing needs and emerging technologies

PDCN is concerned that new technologies providing innovative solutions to better support people with severe physical disabilities do not fit within the proposed support categories. This is particularly relevant for people with physical disabilities who may rely on assistive technology, mobility equipment, home modifications and other disability related supports to maintain their independence. For example, smart glasses which provide audio descriptions for people who are blind or vision impaired illustrate how emerging technology can create new ways to support participation and independence. While standard prescription glasses are not funded by the NDIS, this assistive technology should be eligible for funding as a disability related approved support for people who are blind or vision impaired. Support rules must be clear enough to guide decisions while remaining flexible enough to recognise the changing range of products and services that can meet disability support needs.

There is also evidence that existing support lists can be challenging for people with disabilities to understand. A 2025 consultation by the Department of Health, Disability and Ageing on the support lists found that 68% of those who had use them said they were hard to understand⁷. Additionally, a separate PDCN survey on NDIS changes in 2025 found that only 15% of respondents said they completely understood the support lists. These findings highlight the need for support rules that are practical and understandable for participants to use. The NDIA should provide accessible operational guidance and examples explaining how the rules apply in different circumstances.

⁷ Department of Health, Disability and Ageing (2026), *Consultation on NDIS Supports Rules (2025)*, Australian Government, August 2026 <<https://www.health.gov.au/sites/default/files/2026-08/consultation-on-ndis-supports-rules-2025.pdf>>

7.3 Support rules need to be reviewed regularly to maintain relevance, consistency and accountability

Support rules must remain relevant to disability support needs, available technologies and approaches to delivering support change. A framework that is not regularly reviewed risks becoming outdated, creating uncertainty and frustration for participants and limiting access to appropriate supports, even when a requested support may offer better value for money. The Grattan Institute's June 2025 report *Saving the NDIS*⁸ reviewed the Section 10 Rules defining what goods and services can or cannot be funded under the NDIS. The report identified problems with complexity and the administrative burden of existing rules. As a result, participants have limited control, involvement and flexibility in determining the required ongoing supports they need and the suitability of cost-effective alternatives. Regular review would enable the NDIA to assess whether the rules are operating as intended, identify unintended impacts on people with physical disabilities and consider whether changes are needed as new technologies and innovative supports emerge.

Recommendations

Recommendation 11: Support participants to transition to the new framework by publishing clear guidelines explaining which existing supports will be recognised within the new 18 categories. The guidance should include examples relevant to people with physical disabilities, explain how participants' existing funding and supports will be treated, and set out safeguards to prevent the loss or interruption of essential supports because of the transition. Participants should also be supported to navigate the new framework where needed.

Recommendation 12: Support rules should be reviewed at least annually, in consultation with people with physical disabilities and the disability advocacy sector to ensure the rules remain clear, consistent and responsive to changing support needs, emerging technologies and innovative supports.

⁸ The Grattan Institute, *Saving the NDIS: How to rebalance disability services to get better result*, June 2025.

8 Appendix: summary of recommendations

Recommendation 1: The new Planning Framework must enable people with severe physical disabilities, particularly those with complex or dynamic support needs, to accurately demonstrate their functional capacity and secure funding that reflects their actual support needs. Clear guidance and safeguards must prevent changes to assessment and planning processes from resulting in inadequate funding, delays or interruptions to essential supports.

Recommendation 2: Training materials and qualifications for assessors undertaking the support needs assessment should be high quality, consistent and tested for quality assurance with the disability sector and people with physical disabilities. This will ensure assessors have the knowledge and tools to make accurate, consistent and evidence-informed decisions.

Recommendation 3: Clarify the format through which support needs assessments will take place in relation to Section 32L(2) of the NDIS Act 2013 (Cth) and ensure that a face-to-face option is provided, including the option for in-home assessments to ensure people with severe physical disabilities are not excluded from the assessment process.

Recommendation 4: Amend Section 32L(6A) of the NDIS Act 2013 (Cth) to establish clear timelines and performance targets for completing reports following supports needs assessments to ensure timely delivery, accountability and transparency for participants.

Recommendation 5: As part of building a plan and when deciding budget allocations for categories of stated supports in relation to S32K (1A) of the NDIS Act 2013 (Cth), the NDIA must consider what is the most effective and fit-for-purpose option for the participant. The decision must not be made based on what is the cheapest option alone but with consideration of individual circumstances and the usability, longevity and functionality of the support in their daily life.

Recommendation 6: Ensure that obtaining quotes remains one option for determining the reasonable cost of a support and does not become a mandatory requirement as part of building a plan. Safeguards must ensure that in thin markets, participants' geographical and financial constraints do not prevent them from obtaining evidence of support costs.

Recommendation 7: Publish accessible information setting out clear timeframes for each variation and reassessment pathway, including for the NDIA to acknowledge requests within a specific period relative to the receipt of the request, provide status updates and establish escalation processes when deadlines are missed. Participants must receive clear information about how a variation or reassessment may affect their existing funding, with safeguards to prevent unnecessary disruption to disability related supports while a decision is pending.

Recommendation 8: Establish clear and proportionate requirements for evidence used in plan variations and reassessments. The NDIA should explain what evidence is required and why. Where the NDIA requires additional assessments or reports, these must be funded separately by the NDIA and must not reduce the participant's funding for disability related supports.

Recommendation 9: Ensure that funding decisions for plan variations and reassessments reflect the actual and reasonable market costs of equivalent supports and services. This should include accounting for inflation over the duration of plan, particularly for significant accessibility related works. Where the cost of an essential support costs more than the initial estimate because of a change in circumstances or reasonable price increases, participants should have access to a clear and timely process to seek additional funding.

Recommendation 10: The plan reassessment and variation processes should prohibit determinations of disability-related support needs relying on assumptions about informal supports continuing to be available. This is particularly important for people with complex, fluctuating or episodic physical disabilities.

Recommendation 11: Support participants to transition to the new framework by publishing clear guidelines explaining which existing supports will be recognised within the new 18 categories. The guidance should include examples relevant to people with physical disabilities, explain how participants' existing funding and supports will be treated, and set out safeguards to prevent the loss or interruption of essential supports because of the transition. Participants should also be supported to navigate the new framework where needed.

Recommendation 12: Support rules should be reviewed at least annually, in consultation with people with physical disabilities and the disability advocacy sector to ensure the rules remain clear, consistent and responsive to changing support needs, emerging technologies and innovative supports.