

Submission to the Public Consultation on NDIS New Framework Planning Rules

Change the System, Not the Person

When systems recognise difference, people thrive.

Submitted by: Australian Autism Alliance

The Australian Autism Alliance provides national policy expertise on autism and contributes evidence-informed advice to governments on system reforms affecting Autistic Australians.

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Acknowledgements

We acknowledge the First Nations and Traditional Owners of the land, sea and waterways and pay respects to Elders past, and present and recognise those whose ongoing effort to protect and promote Aboriginal and Torres Strait Islander cultures will leave a lasting legacy for future Elders and leaders.

We recognise the enduring connection that First Nations peoples have to land, waters, culture, and community. This land was, is, and always will be Aboriginal land.

We acknowledge the individual and collective expertise of those with a living or lived experience of disability, as well as the lived experience of people who have been carers. We recognise their vital contribution at all levels and value the courage of those who share their unique perspective for the purpose of learning and growing together to achieve better outcomes for all.

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1 About the Australian Autism Alliance

www.australianautismalliance.org.au

The Alliance is a funded national peak body Disability Representative Organisation (DRO) providing a Strong Voice for Autism, and authoritative policy expertise on autism working with Australian government at all levels to strengthen policy and service systems affecting Autistic Australians. Established in 2016, the Alliance works to improve the life chances of Autistic people and strengthen collaboration across the Australian autism community.

The Alliance contributes futures-focused adviser expertise to a range of national advisory and reform processes, including DHDA Disability Representative Organisation program, the NDIA Autism Advisory Group, the NDIA DRCO Co-Design Advisory and Reform groups, NDIS Commission Disability Sector Consultative group, the National Autism Strategy Oversight Council, and National Health and Mental Health Roadmap for Autistic people. The Alliance is focused on system design solutions that enable disability systems to respond effectively to the diversity of Autistic support needs. **“Change the System, Not the Person”**

Our membership represents a cohesive national network of key organisations with a diverse focus on autism – that is led by Autistic people, advocacy groups, peak bodies, service providers, and researchers. Together, this network provides a platform for the diversity of Autistic perspectives and lived experience across Australia.

Through our members and communication channels, the Alliance reaches more than half a million people and supports Autistic people and their families across the lifespan. Most importantly, our work is informed by Autistic people and the Australian autism community.





We:

- are Australia's first diverse collaborative network of autism organisations bringing together a range of autism interests.
- are a funded Disability Representative Organisation (DRO) since 2024 advocating reach well over half a million people through our communication channels and provide support to Autistic people across the lifespan from early childhood to adulthood. Most importantly, our work is informed by Autistic people and the Australian Autism community
- have significant national and international linkages for advocacy, research and service delivery.
- worked with government to secure pre-election commitments for the National Autism Strategy and National Health and Mental Health Roadmap
- continue to support government through being active in various roles and representations, including: DHDA DRO forums, the NDIA Autism Advisory Group, the NDIA DRCO Co-Design Advisory and Reform groups, NDIS Commission Disability Sector Consultative group, National Autism Strategy Oversight Council member, National Health and Mental Health Roadmap for Autistic people, and Children's Expert Advisory Group
- have been a witness at a number of inquiries including the Senate Inquiry into Autism and the NDIS Capability and Culture of the NDIA.
- commissioned the largest and most comprehensive community consultation survey of Autistic people and their families and carers in Australia to inform the Senate Inquiry into Autism with over 3,800 responses received.

2 Executive Summary

The Australian Autism Alliance welcomes the opportunity to contribute to the consultation on the proposed NDIS New Framework Planning Rules. The Alliance supports the Government's objective of making planning clearer, fairer and more consistent, and recognises that the proposed framework seeks to move away from highly variable line-by-line decision making toward a more transparent needs-based approach.

Several elements of the proposed reforms have the potential to improve the participant experience, including a clearer connection between support needs and planning outcomes, whole-of-person budgeting, increased use of flexible funding, and more consistent assessment processes. The Alliance also welcomes the commitment to staged implementation and opportunities for participants to provide feedback during rollout.

While the objectives of the reform are supported, the success of the new framework will depend on the clarity and safeguards built into its implementation. Several critical operational elements remain unpublished, including the detailed budget methodology, the role of informal supports in funding decisions, the operation of funding periods and restrictions, and the safeguards required to ensure Support Needs Assessments accurately capture the diversity of autism support needs (discussed further in Section 6).

Without visibility of these elements, stakeholders cannot fully assess how the framework will operate in practice or whether it will reliably capture the diversity of disability support needs.

Transparency in these areas will be essential to building confidence that the new framework can deliver the intended improvements in fairness, consistency and participant outcomes. In particular, participants and planners must be able to clearly trace how assessment findings translate into participant budgets. Ensuring that assessment outcomes inform planning decisions—rather than unintentionally functioning as implicit funding ceilings—will be critical to maintaining confidence in the planning framework.

Several aspects of this submission should therefore be understood as provisional pending the release of further operational detail.

What we do know is that the system is moving toward a Support Needs Assessment based on the I-CAN v6 tool, with representations that it will be used by trained and accredited assessors and supplemented by personal and environmental questionnaires and targeted modules for complex needs. While a structured assessment approach may improve consistency and reduce administrative burden, it also creates risks if the assessment process is not rigorously validated across disability cohorts, including diverse autism profiles and participants with complex communication needs.

For this reason, while the Alliance recognises the potential benefits of introducing a common assessment approach across disability cohorts, it has not endorsed the use of I-CAN for Autistic participants aged 16 and over until there is clear evidence that the combined assessment system can reliably capture the diversity of autistic support needs. Consistency in planning outcomes must never come at the expense of accurately recognising individual support needs. Any assessment system must therefore be both **fit for purpose as a policy tool and fit for person in capturing the real experiences of participants**.

Autism presents a useful policy test case because it encompasses a wide range of support profiles, including participants with complex communication needs, fluctuating functional capacity, masking behaviours, co-occurring conditions and diverse environmental sensitivities. A planning framework that can reliably capture and respond to this diversity of support needs is more likely to function effectively across the broader NDIS participant population. For more on this refer to Section 5.

For this reason, the Alliance's comments should be understood as identifying **system design considerations relevant to the effectiveness of the framework for all participants**, while drawing on autism-specific insights where they illustrate potential implementation risks.

Key recommendations focus on:

- transparency in the translation of assessment findings into participant budgets
- safeguards to ensure assessment accuracy and participant verification
- clear and accessible planning and review pathways
- protections that preserve flexibility and participant choice
- transparent implementation and monitoring arrangements.

Strengthening these system design elements will help ensure the new planning framework delivers fair, transparent and sustainable outcomes for participants and the Scheme as a whole.

The Alliance stands ready to continue working with government, the NDIA and the disability community to ensure the new framework is implemented safely and delivers the intended improvements for participants.

3 What the Autism Community Told Us

To inform this submission, the Australian Autism Alliance conducted a short community pulse consultation to gather indicative feedback from Autistic people, families and members of the Australian autism community. This was through an online survey aligned with the four-step planning framework consultation materials and broader community feedback. We thank those who responded for their valuable time.

While responses reflected diverse experiences of the NDIS, several consistent themes emerged regarding the proposed planning framework.

3.1 Transparency and explainability are essential

Participants consistently emphasised the importance of being able to understand how assessment findings translate into planning decisions and budgets. Many respondents expressed concern that key operational elements of the new framework remain unclear.

“NDIA hasn’t provided clear answers about how much human intervention there will be once the Needs Assessment data are entered into the I-CAN tool.”

Survey results extracted: Participants emphasised that transparent processes and clear explanations are critical to maintaining trust in planning decisions.

3.2 Human oversight and professional expertise must remain central

Respondents expressed strong concern that assessment and budgeting decisions must involve appropriately trained professionals and meaningful human oversight.

“I don’t want AI involved in this process — there should always be human oversight and control for human needs.”

Survey results extracted: Many respondents also highlighted the importance of assessors having disability-specific expertise.

3.3 Participants need meaningful opportunities to review and correct assessments

Participants emphasised the importance of being able to review assessment reports and correct errors before planning decisions are finalised.

“Decisions made by others with no transparency or ability to influence the plan for ourselves.”

Survey results extracted: Providing draft reports and correction pathways was widely viewed as essential to ensuring fairness and accuracy.

3.4 Flexibility and participant choice must be preserved

Participants recognised the potential benefits of more flexible funding arrangements but emphasised that flexibility must be genuine.

“Flexible funding is important, and respects autonomy and agency.”

Survey results extracted: Respondents also noted that overly rigid funding periods or restrictions could limit participants’ ability to respond to changing support needs.

3.5 Communication and accessibility remain critical

Participants emphasised the importance of clear, accessible explanations of the new framework, including examples and practical guidance.

“Simpler language and terminology, visuals and having someone to help explain the changes would make a big difference.”

Survey results extracted: Clear communication was seen as particularly important for Autistic participants who may experience increased stress during periods of system change.

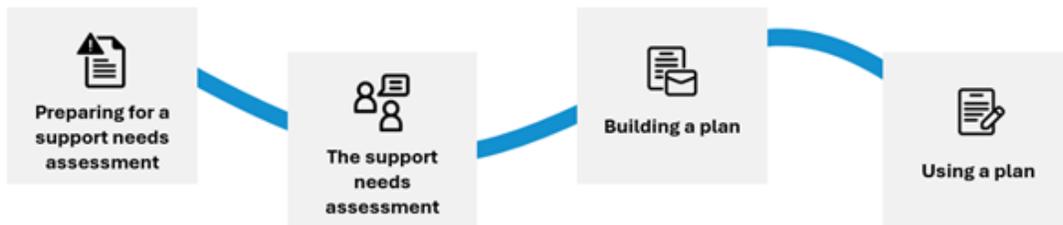
Community feedback consistently emphasised the need for system safeguards—such as clearer information, transparent decision-making and opportunities to correct assessment reports—rather than changes to individual participants themselves. This reinforces the Alliance’s principle of “Change the System, Not the Person”

These insights informed the system design considerations and recommendations presented throughout this submission.

4 Consultation Questions Response Mapping

4.1 Response Mapping

This submission responds directly to the consultation questions **within the four-step planning framework used in the consultation materials** and identifies additional implementation risks and safeguards necessary to ensure the new framework delivers fair and person-centred outcomes.



The analysis and recommendations in this submission draw on:

- lived experience insights from Autistic people and families
- engagement with autism advocacy organisations and service providers
- policy expertise developed through the Alliance’s participation in national advisory groups and reform consultations
- emerging research and international evidence relating to disability needs assessment frameworks.

The Alliance has used the responses and unfiltered quotes from its online survey issued during the consultation period referencing the four-step planning framework consultation materials, to gather opinions and suggestions from Autistic people and the Australian autism community. We will update this submission at a later date with any further relevant information taken from the survey.

The table below identifies where each consultation question is addressed in this submission.

Consultation question	Section in Submission
What other information should be included in the Support Needs Assessment report?	Section 8.2 – Support Needs Assessment
When should a replacement assessment occur?	Section 8.2 – Replacement Assessment Safeguards
Do you have concerns or questions about the list of stated supports?	Section 8.3 – Building a Plan
What is the best way to explain the new rules to people?	Sections 8.1 and 8.4 – Preparing for Assessment and Using a Plan
Is there anything else the Department should consider for the new rules?	Sections 8.3 and 8.4 – Budget Methodology Transparency, Funding Periods and Safeguards

4.2 Scope of this submission

This submission responds to the consultation on the proposed New Framework Planning Rules and focuses on issues relevant to the participant planning process, including the Support Needs Assessment, the development of participant plans and budgets, flexible and stated supports, funding periods, and review pathways.

Where the submission discusses implementation considerations—such as assessor capability, validation of assessment tools or participant communication—these comments are intended to support the effective operation of the proposed rules and the broader planning framework.

5 Summary of Key Recommendations

(for Strengthening the Planning Framework and Support Effective Implementation)

5.1 Purpose of this Submission

The Australian Autism Alliance supports the objective of creating a planning framework that is clearer, fairer and more consistent for participants. This submission identifies practical system design safeguards and implementation considerations to support the safe and effective introduction of the proposed planning framework.

Drawing on national expertise in autism policy and lived experience, the recommendations below focus on areas where the interaction between the Support Needs Assessment process, budget methodology and plan flexibility may have significant consequences for participant outcomes.

Autism provides a useful lens for examining the effectiveness of planning systems because of the diversity and complexity of support needs involved. Further discussion of this lens is provided in Section 6.

5.2 Summary of Recommendations

While this consultation focuses on the planning rules themselves, several recommendations address implementation and system governance considerations necessary for the framework to operate safely in practice.

Legend: R = Recommendation

Rec No	Summary of Recommendations	Policy Area	Section in Submission
System Design Foundations			
R1	Adopt system design principles to guide implementation of the new planning framework including recognition of diverse needs, transparency, safeguards, flexibility, system learning and validation.	System design	Section 7
R2	Publicly release operational information required to understand how the planning framework will operate including assessment methodology, planning traceability, safeguards, review pathways, automation transparency and monitoring arrangements.	Transparency / governance	Section 8
Step 1 – Preparing for Assessment			
R3	Publish participant preparation resources explaining participant rights, evidence requirements and the role of support persons.	Participant preparation	Section 10.1
R4	Provide preparation materials in accessible formats including Easy Read, Auslan, translated resources and visual guides.	Accessibility	Section 10.1



Rec No	Summary of Recommendations	Policy Area	Section in Submission
R5	Provide additional preparation support to accommodate communication differences, sensory needs and processing time requirements.	Accessibility / participant support	Section 10.1
R6	Provide practical explanatory resources about the new planning framework including guides, examples and checklists.	Communication and transition	Section 10.1
Step 2 – Support Needs Assessment			
R7	Provide accessible communication options in assessments including written submissions and multi-session assessments where required.	Assessment accessibility	Section 10.2
R8	Publish enforceable assessor competency standards including autism competence and reasonable adjustments.	Assessor capability	Section 10.2
R9	Ensure assessors have qualifications and competencies consistent with the assessment methodology used.	Assessor capability	Section 10.2
R10	Publish an explainability statement describing any automation used in budgeting decisions.	Automation transparency	Section 10.2
R11	Introduce a standardised Support Needs Assessment report including structured fields covering communication, sensory needs, executive functioning, masking, environmental context and evidence considered.	Assessment report standards	Section 10.2
R12	Provide draft assessment reports and allow participants a supported correction window before finalisation.	Procedural safeguards	Section 10.2
R13	Require clinical verification at the beginning and end of the assessment process.	Assessment quality	Section 10.2
R14	Establish a real-time pathway to correct errors, submit new evidence and resolve material issues before plans are approved.	Procedural fairness	Section 10.2
R15	Require assessments and budgeting methodologies to capture environmental and cross-system factors consistent with the ICF framework.	Environmental context	Section 10.2
R16	Define clear triggers for replacement assessments where errors, procedural issues or new evidence arise.	Replacement assessments	Section 10.2
R17		Governance / co-design	Section 10.2



Rec No	Summary of Recommendations	Policy Area	Section in Submission
	Co-design additional replacement assessment triggers with the disability community.		
R18	Ensure participants can request replacement assessments without punitive consequences.	Procedural fairness	Section 10.2
R19	Ensure replacement assessment processes are trauma-informed and accessible.	Participant safeguards	Section 10.2
Step 3 – Building a Plan			
R20	Publish operational detail of the budget methodology so stakeholders can understand how assessment findings translate into participant budgets.	Budget transparency	Section 10.3
R21	Introduce safeguards for the use of stated supports so they remain minimal, justified and preserve participant choice.	Plan design	Section 10.3
R22	Clarify definitions of assistive technology and related supports to ensure everyday disability supports remain accessible.	Plan design	Section 10.3
R23	Ensure stated supports are limited, clearly justified and reviewable.	Plan design	Section 10.3
R24	Introduce a rights-based justification test and participant review rights when stated supports are applied.	Rights and safeguards	Section 10.3
R25	Enable rapid plan adjustments to prevent escalation to crisis supports.	Plan flexibility	Section 10.3
Step 4 – Using a Plan			
R26	Provide clear participant guidance on how plans operate in practice and how funding can be used.	Plan implementation	Section 10.4
R27	Determine funding periods in consultation with participants, with longer periods as the default.	Plan implementation	Section 10.4
R28	Make plan variation the default mechanism for most changes in circumstances rather than requiring reassessment.	Plan flexibility	Section 10.4
R29	Develop a comprehensive communication package explaining the new rules and participant pathways.	Communication and transition	Section 10.4
Transition and Implementation			

Rec No	Summary of Recommendations	Policy Area	Section in Submission
R30	Develop safeguards recognising distinct participant profiles to ensure assessment processes address diverse support needs.	Implementation safeguards	Section 10.4
R31	Introduce safeguards for participants with high support and complex communication needs.	Implementation safeguards	Section 10.4
R32	Introduce safeguards for children requiring early intervention and family supports.	Child planning safeguards	Section 10.4
R33	Introduce safeguards for Autistic adults with fluctuating needs.	Fluctuating needs safeguards	Section 10.4
R34	Improve transparency in transition and implementation arrangements including notice periods and cohort selection criteria.	Transition governance	Section 11
Evidence and System Governance			
R35	Accelerate development of a national autism epidemiological research strategy.	Evidence and forecasting	Section 12
R36	Strengthen national data on autism support and service needs.	Evidence and forecasting	Section 12
R37	Establish a quality assurance framework for Support Needs Assessments including auditing and assessor oversight.	Governance / QA	Section 13
R38	Publish aggregated planning outcome data across participant cohorts and regions to monitor fairness.	Monitoring and transparency	Section 13
R39	Conduct an early implementation review examining participant experience, consistency of planning outcomes and effectiveness of safeguards.	Implementation monitoring	Section 13

Successful reform will require strong human oversight, transparent budgeting methodologies, meaningful review pathways, and disability-competent and trauma-informed implementation.

Together, these recommendations aim to ensure that the new planning framework delivers transparent decision-making, accurate recognition of support needs and fair outcomes for participants.

Detailed explanation and supporting evidence for each recommendation is provided in the relevant section of this submission.

6 Context: Autism as a System Design Lens

Understanding how the new planning framework will operate in practice requires examining how it captures diverse and sometimes complex support needs.

Autism is characterised by significant variation in communication, sensory processing, cognitive profiles and support needs. Support needs may also fluctuate depending on environmental context and life circumstances. Assessment systems must therefore be capable of accurately capturing complex and variable support needs across the autism spectrum.

The Alliance's approach to reform is grounded in the principle **“Change the System, Not the Person.”** Reform should focus on improving system design rather than expecting participants to adapt to systems that do not recognise the diversity of support needs. This reflects the International Classification of Functioning (ICF), which recognises that disability outcomes arise from the interaction between individual characteristics and the environments and systems people navigate.

Given the diversity of autism support needs, autism provides a particularly useful lens for designing planning systems that can accurately recognise and respond to participant needs. Autistic people may experience complex communication differences, sensory sensitivities, masking behaviours, fluctuating capacity and co-occurring conditions. As a result, support needs may not always be visible in short assessments or unfamiliar environments.

Planning frameworks that focus only on individual capacity risk overlooking the environmental and systemic factors that shape participation. Effective planning must therefore consider the real-world circumstances participants navigate, including environmental barriers, service availability and the sustainability of informal supports.

Planning systems that accurately recognise support needs are more likely to deliver stable outcomes for participants, including:

- stable housing
- family sustainability
- employment pathways
- community participation
- improved health outcomes.

These outcomes are also associated with reduced downstream costs such as crisis supports, hospitalisation, system disengagement and family breakdown.

Applying these principles to the NDIS planning framework means ensuring that assessment processes, budget methodologies and planning rules are capable of recognising diverse and sometimes fluctuating support needs. In this sense, autism-informed system design contributes not only to fairness for participants but also to the long-term sustainability of the Scheme.

Growth in autism participation within the NDIS is sometimes interpreted primarily through the lens of Scheme costs. However, participation trends can also be understood as signals for system learning. They highlight areas where planning systems may need to evolve to better recognise previously unmet support needs.

Autism therefore provides a particularly clear test of whether planning systems can recognise complex and diverse support needs. Planning frameworks that function well for Autistic participants are more likely to function effectively across the broader NDIS participant population.

The effectiveness and sustainability of the NDIS will depend not on expecting participants to adapt to rigid systems, but on designing planning frameworks that recognise diverse support needs and respond to them appropriately.

Where operational details are not yet available, the Alliance's response should be understood as provisional pending further disclosure of rules and guidance, including the information identified under Recommendation 1.

System Design Implication

If the planning framework can accurately recognise and respond to the diversity of Autistic support needs, it is more likely to function effectively for the broader NDIS participant population. Autism therefore provides **a practical system test case** for designing fair, transparent and sustainable planning processes.

7 Policy System Design Principles for the New Planning Framework

The Alliance supports the objective of creating a planning framework that is clearer, fairer and more consistent for participants. Based on our analysis of the consultation materials and the diversity of autistic support needs, several system design principles are particularly important to the framework's success.

These principles draw on participant experience, disability policy research and the practical realities of implementing complex reforms within the NDIS. They provide a foundation for designing assessment processes, translating assessment findings into budgets, and establishing planning safeguards that support fair and sustainable outcomes for participants and the Scheme as a whole.

The principles are also reflected in themes emerging from the Alliance's community consultation, which emphasised transparent decision-making, autism-informed assessment practices, accessible communication and meaningful opportunities for participants to review and correct information during the planning process.

Recommendation 1– Adopt system design principles for the planning framework

Adopt the system design principles outlined in Section 7 to guide the development and implementation of the new planning framework, including the Support Needs Assessment process, the translation of assessment findings into budgets, and associated planning rules and operational guidance.



POLICY SYSTEM DESIGN PRINCIPLES FOR THE NEW PLANNING FRAMEWORK

Principle 1 – Accurate recognition of diverse support needs

Assessment processes must reliably capture the diversity of participant experiences, including communication differences, sensory sensitivities and fluctuating functional capacity.

In practice, this means ensuring assessment processes can recognise how Autistic people communicate, regulate sensory environments and manage daily life, so that support needs are not underestimated during short or unfamiliar assessment conversations.

Principle 2 – Transparency and traceability in funding decisions

Participants and planners must be able to understand how identified support needs translate into plan budgets.

In practice, participants should be able to clearly see how the information gathered in an assessment leads to the funding included in their plan, so that planning decisions are understandable and not experienced as arbitrary or unexplained.

Principle 3 – Procedural safeguards and early issue resolution

Planning processes must provide clear pathways for participants to correct factual errors, request replacement assessments and resolve material issues during the planning process.

In practice, this means participants must be able to review assessment reports, correct mistakes and raise concerns before decisions about their funding are finalised.

Principle 4 – Flexibility to reflect individual and environmental circumstances

Planning systems must recognise the interaction between individual needs and environmental factors such as service availability, community supports and life transitions.

In practice, planning decisions should consider real-world circumstances such as available services, housing stability, employment transitions and family capacity, rather than assuming identical conditions for all participants.

Principle 5 – Continuous system learning

Monitoring outcomes and learning from early implementation should inform ongoing refinement of the planning framework.

In practice, early implementation should be closely monitored, and lessons should be publicly reported so that issues can be addressed quickly and the system can improve over time.

Principle 6 – Evidence and validation as a foundation for implementation

Assessment tools and planning processes must be independently validated and tested across diverse participant cohorts before mandatory implementation to ensure they are both **fit for purpose and fit for person**. This should include validation across diverse disability cohorts, including Autistic participants with complex communication needs, masking, high support needs and co-occurring conditions.

In practice, this means testing the assessment process with diverse Autistic participants before it determines funding outcomes, so that the system accurately captures real support needs.

The recommendations in this submission are intended to support the implementation of these system design principles within the proposed planning framework.

8 Information Requests Required to Support Implementation

The consultation materials outline the structure of the proposed planning framework but leave several important operational elements unspecified. Providing greater clarity on these elements would assist participants, families, providers and advocates to understand how the framework will operate in practice and strengthen transparency in planning decisions.

INFORMATION REQUESTS REQUIRED TO SUPPORT IMPLEMENTATION

A. ASSESSMENT AND METHODOLOGY TRANSPARENCY

1. Assessment methodology

- Detailed information about how the Support Needs Assessment process will operate in practice (including validation and fairness evidence for the assessment process: by disability cohort (including autism sub profiles and communication needs), cultural/linguistic background, rural/remote, and age group).
- The role of assessors' professional judgement within the assessment process.
- Quality assurance and training frameworks and requirements for assessors.

2. Assessment processes and safeguards

- Provide detailed guidance on assessment procedures, reasonable adjustments during assessments and mechanisms for correcting factual errors in assessment reports.

3. Assessor Standards and Training

- Publish minimum qualifications, autism-competency training, supervision, and QA process for report validity

B. PLANNING AND BUDGETING TRANSPARENCY

4. Participant planning traceability

- Publish the budget methodology rules used to translate support Needs Assessment findings into participant planning decisions, and release exposure drafts including worked examples illustrating how funding levels are determined across different participant profiles, (and adjustments and safeguards against cap limits) creating clear traceability between identified support needs and allocated funding.
- Clarification of how personal and environmental factors influence funding outcomes.

5. Plan design and funding structures

- Guidance on the circumstances in which supports will be included as flexible funding versus stated supports. Provide for stated supports a full list, rationale for inclusion, and plain-language examples.
- Information on how funding periods will be determined and applied.
- Information on how flexibility will be maintained for participants with fluctuating or episodic support needs.
- Governance arrangements for funding restrictions, including when restrictions may be applied, time limits, reviewability, participant-requested restrictions, and safeguards to ensure access to therapeutic and capacity-building supports is not unintentionally restricted.

6. Informal Supports

- Provide information how informal supports are reflected and will be considered within budget determinations (including definition, measurement method, and safeguards against inequity for people without strong informal networks).



INFORMATION REQUESTS REQUIRED TO SUPPORT IMPLEMENTATION continued.....

C. PARTICIPANT RIGHTS AND PROCEDURAL FAIRNESS

7. Replacement assessment criteria

- Clarify the circumstances in which replacement support Needs Assessments may be requested

8. Review and appeal pathways

- Clear explanations of how participants can seek timely review of assessment outcomes and planning decisions including the process participants can follow if they believe an assessment does not accurately reflect their needs, including where participants believe their needs have not been accurately captured.
- Guidance on how review pathways will operate under a budget-method planning system, including how participants may challenge the adequacy of a plan where the budget methodology has been applied incorrectly or where relevant evidence was not considered

9. Procedural Fairness – Impairment Notices

- Publish:
 - (a) a minimum notice standard for transition communications, and
 - (b) a participant-facing explanation of what a Notice of Impairments does and does not do, including how people can seek corrections, what evidence is considered, and expected timeframes.

D. SYSTEM GOVERNANCE AND OVERSIGHT

10. Automated Decision-Support Tools

- Provide transparency regarding any automated decision-support tools used in budget calculations.
- Publish an explainability statement describing where algorithmic or automated tools are used in the planning framework, the data inputs used, oversight mechanisms, and how participants can request review where automated outputs may have influenced a decision.

11. Monitoring and evaluation

- Publish information on how the implementation of the new planning framework will be monitored and how lessons from early implementation will inform ongoing system improvement.

Recommendation 2: Public release of information

Release publicly the Information Requests in Section 8 that outline 4 elements and 11 sub elements to help ensure that participants and the broader community understand the framework and can engage with it effectively. The 4 elements are A) Assessment and Methodology Transparency B. Planning and Budgeting Transparency C. Participant Rights and Procedural Fairness and D. System Governance and Oversight.

9 Consultation Integrity, Communication and Readiness

This consultation concerns rule changes that will shape how participants are assessed, budgeted and supported. These reforms have significant implications for daily life, safety and participation for many people with disability. Reforms of this scale require adequate time, accessible information and community supports so that people can understand what is proposed and provide meaningful feedback.

9.1 Consultation accessibility

The Department's own *"What We Heard"* summary recorded that stakeholders want communication that is clear, timely and responsive to diverse communication needs. This includes the use of Easy Read materials, visual aids, timelines and examples of assessment questions so participants can understand how the framework will operate in practice.

"I've attended multiple NDIA run webinars that have not answered any questions... it's exhausting."

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb '26)

These concerns are particularly relevant for Autistic participants and families. Autism is often associated with heightened stress during periods of uncertainty or rapid system change. Major NDIS change communications can land differently for different people. Clear timelines, practical explanations and predictable communication can therefore be particularly important for Autistic participants and their families during major reforms.

9.2 Consultation transparency

The Department also documented concerns that consultation can feel non-transparent and perceived as more performative than influential, with a desire for clearer information about how rules are used in practice and how feedback changes outcomes.

Providing greater operational clarity, including practical examples of how planning rules will function, would help strengthen trust in the consultation process and support informed engagement by participants, families, service providers and representative organisations.

"I am concerned that the consultation process may function more as reassurance than as genuine co-design... key decisions about the new planning framework may already be determined."

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb '26)

Community respondents frequently raised concerns about transparency and participant influence in planning decisions. As one respondent noted, there is anxiety about **“decisions made by others with no transparency or ability to influence plans.”**

9.3 Consultation timeframe and implementation readiness

The consultation package was publicly released on **23 January 2026**, with the initial transition cohort scheduled to commence from **1 July 2026**. While the staged rollout of the framework is sensible, the relatively short interval between publication of extensive consultation materials and the planned commencement increases the importance of releasing complete operational detail early.

This is particularly important where rules depend on technical instruments and further guidance that has not yet been published. Early disclosure of these details would support meaningful consultation and allow participants, organisations and the sector to prepare for implementation.

Reforms that affect how disability support needs are assessed must be implemented in a way that strengthens trust in the NDIS system. Without transparent validation and strong safeguards, participants may reasonably fear that new assessment processes could reduce supports rather than improve planning outcomes.

The Alliance also notes the concerns expressed in the publicly released **DRO Joint Statement**, which highlights the importance of adequate consultation, operational clarity and implementation readiness for reforms of this scale.

9.4 Procedural safeguards during planning

The consultation materials describe the broad structure of the new planning framework but do not yet clearly specify how participants can address material issues identified during the assessment process before plans are finalised.

While the legislative framework provides mechanisms such as replacement assessments and plan variations, the consultation materials do not yet explain how these mechanisms will operate in practice if significant issues arise during planning.

Given the importance of accurate assessments in determining participant budgets, clearer guidance on early issue resolution mechanisms would support participant confidence in the framework. This issue is discussed further in **Section 7.2 and Recommendation 10.2.7 regarding real-time issue resolution pathways.**

10 Feedback on the Four-Step Planning Process

The consultation materials describe the new planning journey in four stages:

1. **Preparing for a Support Needs Assessment**
2. **The Support Needs Assessment**
3. **Building a Plan**
4. **Using a Plan**

Our detailed response below and community survey feedback follows this structure also.

While the consultation materials outline the structure of the proposed four-step planning process, several operational elements necessary to fully assess the framework have not yet been published.

The Alliance has therefore identified a set of **Information Requests in Section 8** that would assist participants and stakeholders to understand how the framework will operate in practice. Where relevant, some of these information requests are referenced throughout the analysis below.

10.1 Preparing for a Support Needs Assessment

10.1.1 Supportive Intent

Providing clearer preparation resources for participants is welcomed. Preparation support can reduce anxiety and ensure participants are able to communicate their needs effectively.

Recommendation 3: Preparation resources

Preparation resources should include:

- a. clear explanations of participant rights
- b. guidance on preparing evidence
- c. examples of assessment questions
- d. information about support people and advocates.

Recommendation 4: Accessible formats

Accessible formats should include:

- a. Easy Read
- b. Auslan
- c. translated resources
- d. visual guides.

Recommendation 5: Additional preparation support

Allow for additional preparation support to accommodate for communication differences, sensory needs and processing time requirements.

“I like the idea of receiving notice as well as being notified of notice of impairments”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb ‘26)

Being made aware in advance is very important. A lot of people have experienced no contact and no advanced warning of plan changes, or have not been able to contact their LAC or the NDIA when needed.”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb ‘26)

10.1.2 Governance and Notice Safeguards

Participants transitioning to the new framework will receive a **Notice to have a new framework plan**. Because this notice is not reviewable, strong procedural safeguards are required.

Participants will also receive a **Notice of Impairments** identifying impairment categories relevant to planning.

Participants should clearly understand:

- a. What the Notice means
- b. How impairment categories will influence planning
- c. How corrections can be requested.

Information Request 1: Impairment Notices

Publish minimum standards for transition communications and participant-facing explanations of Notice of Impairments, including:

- a. what the notice does and does not determine for planning
- b. how participants can request corrections
- c. what evidence is considered in making corrections
- d. expected decision timeframes.

“It’s ambiguous. How will the NDIS participant be contacted? What communications accommodations are available... since October 25 random calls from the NDIA regarding procedures has been traumatic and confusing for many participants.”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb ‘26)

“At least it is informing a change is coming.”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb ‘26)

“Ensure that both the Notice of Impairments and the Needs Assessment reflect the needs of the autistic participant and not some cookie-cutter template before the budget is generated.”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb ‘26)

“Hopefully it is clear and comprehensive hopefully the participant can easily understand it and easily have things added that have been left out.”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb '26)

10.1.3 Consultation Question (Explain New Rules)

What is the best way to explain the new rules to people (including participants, families and carers)?

The Australian Autism Alliance engaged with Autistic individuals and the autism community to inform these recommendations. This feedback has suggested that the most effective communication approach should be:

- Calm and staged
- Practical and example-driven
- Accessible in multiple formats to accommodate for differing communications and processing styles.

Clear communication is particularly important for Autistic participants, who may experience significant stress when systems change rapidly without clear explanations.

Recommendation 6: Explanatory resources

Explanatory resources should include:

- a. “What changes for me?” participant guides
- b. Step-by-step planning pathway explanation
- c. Before-and-after planning examples
- d. Assessment preparation checklists
- e. Short videos and visual explainers
- f. Support people to explain and consistently answer questions
- g. Availability of reliable contacts when seeking explanations.

“... making it less terrible - simpler language and terminology, visuals, having access to a support person to help understand, having access to advocates, making sure NDIA staff provide consistent and correct information, complex words explained...”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb '26)

“That there is someone who will ask and talk through the needs of the participants.”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb '26)

10.2 The Support Needs Assessment

10.2.1 The Support Needs Assessment Process

The Support Needs Assessment will be a central feature of the new planning framework.

The Step 2 factsheet outlines that the Support Needs Assessment includes a **core assessment tool**, a **personal and environmental circumstances questionnaire**, and **targeted assessment processes** (including allied health evidence for complex supports such as assistive technology, home/vehicle modifications, and disability-related health supports).

The content also indicates that assessors will check information with the participant (and support person where present) and that participants will receive a copy of the assessment report. Where concerns arise, the NDIA delegate may work with the participant to determine whether a **replacement assessment** is required. However, replacement assessments can only be requested **before plan approval** and the criteria for when they will occur are not yet clearly visible in the rules.

Community feedback captured by the Department indicates strong expectations for: assessors who understand disability type and local context; training that includes neurodiversity and trauma-informed practice; accessible assessment formats; and opportunities for participants to review assessment information before it is finalised.

If implemented well, this approach may improve consistency and reduce administrative burden.

However, the Alliance notes that I-CAN is a detailed and time-intensive tool that relies heavily on self-report and assessor interpretation. While structured tools can improve consistency, they are also highly dependent on assessor expertise and on the ability of participants to communicate their support needs within the assessment environment.

Without appropriate safeguards, this approach risks disadvantaging Autistic participants whose needs may be influenced by:

- masking behaviours
- sensory environments
- communication differences
- fluctuating capacity
- complex needs
- intersectionality issues.

Participants who cannot comfortably complete lengthy interview processes or who experience significant communication or sensory barriers during assessments may be particularly affected.

“Remember Autism is a spectrum and stop implying that just because Autism has traits, that other things can’t be associated because it’s not “standard” autism.”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb ‘26)

“As an adult. I have spent the past 4 years trying to get help and supports, only to be told you need more evidence, more reports, to provide more detail/evidence of the impact of my Autism. This is a waste of money and time. It should be given a clear direction and not keep going around in circle to prove who you are, how long you have tried to cope with life, but how to improve life.”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb '26)

10.2.2 Accessibility of assessment methods

The NDIA have represented that written needs assessments will not be available as an option within the new Support Needs Assessment process. While structured interviews can be appropriate for many participants, a single assessment format (verbal) may create unintended accessibility barriers for some people with disability.

For many Autistic people, communication needs vary significantly depending on context, sensory environment and stress levels. Some individuals experience **selective mutism, situational speech loss, delayed processing, or significant difficulty communicating in unfamiliar environments or during extended interviews**. Long assessment interviews (for example, multi-hour sessions) may therefore not accurately reflect a participant’s functional support needs.

When participants cannot communicate effectively within the assessment format provided, there is a risk that their needs may be **under-reported, misunderstood, or influenced by masking behaviours or fatigue**, particularly where assessments rely heavily on real-time verbal interaction. This may disproportionately affect Autistic participants with complex communication needs.

Providing **multiple communication options and reasonable adjustments**, including the ability to provide written responses or supplementary written evidence, would help ensure the assessment process remains accessible and consistent with the Scheme’s commitment to participant participation and fairness.

Ensuring that participants can communicate their needs in ways that are accessible to them is particularly important where assessment findings will directly influence funding outcomes.

Hence providing flexible communication options will help ensure assessments accurately capture participant support needs and reduce the risk of needs being underestimated due to inaccessible assessment formats.

The following recommendation aligns with the principles of the NDIS Act, particularly the commitment to 'choice and control' (Section 4), and the right of participants to be actively involved in decisions that affect them, including having the ability to communicate their support needs in a way that is accessible and appropriate to them

Recommendation 7: Accessible communication options

Ensure the Support Needs Assessment process provides **multiple accessible communication options**, including written submissions or supplementary written responses where appropriate, so participants can communicate their support needs in a format that accommodates communication differences. This should include:

- a. options to provide written responses before or after assessment interviews
- b. the ability to submit structured written evidence describing support needs
- c. reasonable adjustments for participants with selective mutism, situational speech loss or complex communication needs
- d. flexibility to conduct assessments across multiple shorter sessions where required.

“I don’t like anything about this step, and the thought of it makes me feel sick and anxious. If as an autistic person I could participate in an assessment of this nature to determine my support needs, I would not be in the situation I am in my life, where selective mutism, high masking and complex trauma create huge challenges in disclosure and trust with people who assess me. I have many reports about my lived experience and my disability, I do not like anything about having to now do it all over again in a specific way.”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb ‘26)

10.2.3 Assessor Capability and Safeguards

It has been represented that the assessors will have strong training in:

- a. Disability-competent practice
- b. Autism-informed communication
- c. Trauma-informed engagement.

Training alone is not sufficient. Enforceable standards, quality assurance and oversight processes are required to ensure these practices are consistently applied.

Recommendation 8: Enforceable Standards, Quality Assurance and Oversight

Publish:

- a. enforceable standards for assessor competency and training
- b. enforceable standards for autism competence, and reasonable adjustments (including AAC, sensory adaptations, longer sessions, support people).
- c. quality assurance and oversight processes.

Recommendation 9: Matching Assessor Competency to Tool and/or Methodology

Assessors must have the qualifications and level of competency required for any assessment tool, methodology or approach has been designed and tested.

“Again, it is up to us to explain to the assessor who is not an expert... we need to ‘dumb it down’ so they understand.”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb ‘26)

10.2.4 Automation transparency

The Department's consultation materials acknowledge stakeholder interest in understanding how digital systems or analytical models may assist decision-making in the budgeting process. While NDIA communications state that plans will continue to be approved by trained staff, greater transparency is required regarding whether automated decision-support tools influence funding outcomes and how participants can challenge those outcomes if necessary.

Recommendation 10: Explainability Statement

Publish an "explainability statement" covering a) which elements of the budgeting involve automation b) what data inputs are used, c) what human review processes occur, and d) how participants can challenge outcomes.

"It is very unclear re: use of AI in this process... the only option to review is to do the whole process again... will result in people being in a vicious cycle."

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb '26)

"It is inappropriate and not evidence based. It is unclear. It is taking away the right to best practice (having a health professional completing an assessment like this, and it being personalised, not cookie cutter). It will result in more trauma by going through this process, which is unnecessary and further more result in absolutely inappropriate NDIS plans. This will cause direct harm to the community."

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb '26)

"I don't want ai involved in this process, there should always be human oversight and control for human needs."

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb '26)

10.2.5 Consultation Question (Step 2- Additions to Support Needs Assessment report)

What other information should be included in the Support Needs Assessment report?

Legislation requires the Needs Assessment Report to identify disability support needs arising from relevant impairments and allows further requirements to be specified in the rules.

Participants must receive an accessible copy of the report.

As the Support Needs Assessment report will directly inform funding decisions under the new framework, the structure and content of the report is critical to ensuring that participant needs are accurately captured and reflected in plan budgets. To be fit for purpose, especially for Autistic participants, the report should include a standardised, core set of fields, with structured prompts and scope for narrative.

Recommendation 11: Standardised Needs Assessment Report

Produce a Needs Assessment Report that includes a standardised, core set of fields, with structured prompts and scope for narrative:

- a. Communication profile and reasonable adjustments: preferred communication mode, processing time needs, AAC use, interpreter needs, sensory environment requirements during assessment, and observed barriers to communication (this directly addresses risks for people with complex communication needs)
- b. Sensory profile and regulation needs: sensory sensitivities/seeking, environmental triggers, coregulation supports, known de-escalation strategies, and impacts on participation (these can be invisible in brief interviews and fluctuate over time)
- c. Executive functioning and daily living demands: planning, initiation, sequencing, money/time management, safety awareness, community navigation, employment, co-occurring conditions and fatigue impacts, captured with real examples across participants' home/community settings
- d. Masking and "best day" bias safeguards: a required section asking whether the participant tends to minimise difficulties, "mask" in interviews, or present differently in unfamiliar settings; and include corroborating input from supports, where consented
- e. Fluctuation/episodic patterns: description of variability (week to week/situational), with implications for funding periods and support intensity needs
- f. Environmental context: living arrangements, thin markets (service availability), safety risks, transport realities, school/work context, and family/carer capacity and sustainability (the budget methodology explicitly contemplates informal supports being reflected; how this is operationalised must be transparent)
- g. Safeguards and risk assessment summary: risks of exploitation/abuse, need for decision-making supports, and recommended safeguards around the participant and their family/carers etc. (including whether support coordination or behaviour support is required)
- h. Participant goals and preferences: a mandatory section capturing goals, what "good support" looks like, cultural preferences, who the participant trusts, and what must be avoided (for example: re-traumatising environments)
- i. Evidence considered: a clear list of all evidence reviewed (participant-provided documents, historical records, clinician reports, questionnaires), and what weight was given to each.

"The language of a support needs assessment report is again setting up a power differential. More inclusive language should be considered."

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb '26)

"I find the current system works best for people who are the best advocates. It's not actually needs based, the most funding goes to the people who understand how best to ask for stuff."

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb '26)

10.2.5 Essential safeguard: draft report and corrections

Sector feedback consistently requests the provision of draft assessment reports and the ability to review before finalisation. Providing a copy after decisions are made is insufficient to prevent harm from factual errors.

Recommendation 12: Needs Assessment Report Safeguards Process

Arrange for participants to:

- a. receive a **draft assessment report prior to finalisation** within a specified timeframe (e.g. at least 10 business days prior),
- b. have a **supported correction window** of at least 20 business days with accessible formats
- c. have **factual errors corrected** before budgeting.
- d. be able to record agreement or disagreement with the assessor's interpretation of their support needs.

“decisions made by others with no transparency (sic) or ability to influence plan for ourselves”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb '26)

“There is no external appeal process. If the NDIS makes a big mistake, how will it be resolved?”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb '26)

10.2.6 Clinical Verification Safeguards

Clinical verification ensures that:

- the assessment context accurately reflects the participant's disability support needs
- professional evidence is appropriately considered
- final reports accurately reflect functional impacts

This safeguard is particularly important for Autistic participants whose needs may not be fully captured through structured interview tools alone.

Recommendation 13: Clinical Verification

Require clinical verification to occur at both the **beginning and end of the assessment process**.

10.2.7 Real-time resolution of material issues

The NDIS legislative framework includes mechanisms for:

- replacement Needs Assessments and plan variations where planning decisions require reconsideration; and
- monitoring the operation of the Scheme and responding to emerging issues during implementation.

“

For instance, participants are expected to receive their Needs Assessment Report and participate in deriving the statement of participant supports. Where significant factual errors, omissions or risks are identified in the assessment process, there should be a clear mechanism to resolve these issues promptly.

However, the consultation materials do not yet clearly specify how participants can address material errors or risks identified during the assessment process before a plan is finalised or implementation monitoring phase.

The NDIS Act emphasises participant involvement in planning decisions and the importance of accurately identifying disability support needs. Ensuring that participants can correct material errors or omissions during the assessment and planning process is therefore consistent with the objects and principles of the Act. That is:

- Objects of the Act (NDIS Act s3)
- General principles (NDIS Act s4)
- Participant involvement in planning (NDIS Act s31)

Establishing a real-time resolution pathway would support these objectives by allowing material errors or risks identified during the assessment process to be addressed promptly, ensuring that plans are based on accurate information and reducing the need for formal reviews or appeals after plans are approved.

A real-time resolution pathway could include:

- a. correction of factual errors in assessment reports before they are finalised
- b. reconsideration of assessment findings where new evidence is provided
- c. replacement assessments where the original assessment did not adequately capture support needs or reasonable adjustments were not provided.

Also, providing a clear mechanism for resolving material issues during the planning process would support the intent of the Act by ensuring that participants can meaningfully participate in decisions that affect their supports.

Furthermore, planning decisions must be based on accurate and relevant information about a participant's support needs. Ensuring that participants can correct material errors in assessment reports before planning decisions are finalised is therefore consistent with general administrative decision-making principles.

Early resolution of assessment issues will be essential to ensuring that the Support Needs Assessment functions as a tool to inform planning decisions rather than a source of disputes regarding funding adequacy.

Recommendation 14: Real-time Correction and Resolution Pathway

Establish a clear pathway for the real-time resolution of material issues during the assessment and planning process, allowing mechanisms to correct factual errors in assessment reports, consideration of new evidence and replacement assessments, where required, before a plan is approved.

“Many times I’ve seen plans be cut significantly or re-structured to include things they don’t want or need (e.g., speech pathology for a neurodiverse person who has great speech skills), while important funds are cut (e.g., support workers, psychology or respite). Find out what the person actually uses, needs and wants BEFORE you lock it in and BEFORE the system makes it impossible to ask for a review.”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb ‘26)

“Autism is a lifelong condition... why do you have to reassess it and go through this stressful process over and over again.”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb ‘26)

10.2.8 Environmental and Cross-System Context

Autistic people often interact with multiple service systems across their lives, including education, health, mental health and community supports. Planning processes must therefore recognise environmental and cross-system factors consistent with the International Classification of Functioning (ICF), rather than focusing only on individual capacity.

This approach reflects the Alliance’s principle of “Change the System, Not the Person,” recognising that participation outcomes are shaped not only by individual characteristics but also by the systems and environments people navigate.

Environmental factors such as service availability, accessible community environments and the presence of thin markets can significantly influence how disability support needs present in practice. Where services are unavailable or inaccessible, participants may appear to require fewer supports even though the underlying disability support need remains unchanged.

This risk is particularly relevant for Autistic participants, whose participation may be affected by sensory environments, communication barriers and the availability of specialised supports. Planning frameworks must therefore ensure that environmental constraints are not interpreted as evidence of reduced need.

Assessment processes and associated budgeting methodologies should recognise that environmental barriers often indicate the need for additional supports to enable participation, rather than fewer supports.

Recommendation 15: Environmental and Cross-System Context in Assessment and Budgeting

Require Support Needs Assessment processes and associated budgeting methodologies to capture environmental and cross-system factors consistent with the International Classification of Functioning (ICF), including interactions with education, health, mental health and community systems. Environmental barriers—including thin markets, inaccessible environments and service gaps—should be interpreted as indicators of additional support needs rather than reduced need, and participant budgets should reflect the supports required to achieve meaningful participation regardless of current service availability.

10.2.9 Consultation Question (Step 2 - New Assessment Triggers)

“When do you think the NDIA needs to do a new assessment?”

Legislation provides for replacement assessments where the decision-maker is satisfied that another assessment should be undertaken and indicates that reviewers and the Tribunal have the CEO’s powers, including arranging replacement assessments.

Participants must be able to request replacement assessments without fear of losing existing supports.

Recommendation 16: New Assessments Triggers

Require replacement assessments to occur when:

- a. **factual errors exist in the assessment report:** Incorrect living arrangements, support hours, safety risks, diagnoses relevant to functional impacts, or misrecorded responses.
- b. **reasonable adjustments were not provided during assessment:** during assessment (communication, sensory, interpreter, support person), resulting in unreliable data.
- c. **participant evidence conflicts with assessment findings:** where participant evidence (and/or trusted clinician evidence) materially conflicts with assessment findings and the report does not explain why.
- d. **the assessment process did not follow required procedures:** assessment not conducted using required tool/modules, or assessor competence concerns.
- e. **fluctuating or complex needs were not captured adequately:** where fluctuating needs were assessed on a “good day” without adequate corroboration and likely lead to unsafe under support.
- f. **significant life changes occur prior to plan approval:** changed caregiving arrangements, housing instability, discharge from hospital, family violence risk, or sudden loss of services.

Recommendation 17:

Identification of other instances should be codesigned with the community

Recommendation 18: Participants can request a replacement assessment without triggering punitive consequences (e.g., fear of losing existing supports).

Recommendation 19: The process should be trauma-informed and accessible.



“I think these changes are huge and this is going to be concerning and confusing for PWD. IT feels very lack of choice and control once again with what iVE SEEN in the past is very ppunishment (sic) focused with very poor reviews”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb '26)

System Design Implication

Structured assessment tools can improve consistency across the Scheme, but only when they are implemented with strong safeguards. Assessment processes must include **participant verification, appropriate assessor expertise and mechanisms to correct errors** before funding decisions are made.

10.3 Building a Plan

Under the new framework, assessment findings will inform participant budgets and plan structures.

Potential benefits include:

- a. clearer links between support needs and funding
- b. simpler plan structures
- c. improved consistency across participants.

However, several core operational elements of the proposed framework remain unpublished, limiting stakeholders' ability to assess whether the system will produce equitable and sustainable planning outcomes.

“Flexible funding is important, and respects autonomy and agency”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb '26)

“How the budget is produced via AI, the flexible funding can still have restrictions on it, so flexible doesn't really apply across the board. Length of plans and funding periods is going to cause problems for both participants and service providers. Once the budget has been set, there is no recourse other than request another Needs Assessment. NDIA hasn't provided clear answers...”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb '26)

10.3.1 Budget Methodology Transparency

The consultation materials indicate that **budget methodology rules** will determine how identified support needs translate into funding allocations. However, these rules have not yet been released.

The consultation materials themselves indicate that further detail about the budget methodology will be published during the consultation period, meaning that core operational detail is not currently available to stakeholders.

Without this information, it is not possible to assess whether the proposed system will produce equitable funding outcomes or whether assessment outputs may unintentionally function as **implicit funding ceilings rather than starting points for individualised planning decisions**.

Participants should be able to understand how assessment findings translate into funding decisions. This requires **clear traceability between assessment outcomes and budget allocations**, including:

- a. transparent calculation methodologies
- b. participant-accessible explanations of budget decisions
- c. safeguards allowing professional evidence to be considered where required.

The consultation materials also indicate that the budget methodology may take into account the availability of informal supports. While recognising the important role of families and communities, assumptions about informal support availability should not automatically offset funded disability supports, particularly where such support is inconsistent or unsustainable. Informal supports should complement funded disability supports rather than function as implicit substitutes unless the participant explicitly requests this. Transparent guidance on how informal supports are considered within the budget methodology will therefore be essential to maintaining fairness and confidence in planning decisions.

The Department's own "what we heard" report also records uncertainty about how assessment tool outputs may be used within budget systems.

Where budget methodologies rely heavily on assessment tool outputs, there is a risk that these outputs may unintentionally constrain planning discretion. Ensuring transparency in the budget methodology will be critical to avoid this outcome.

For Autistic participants, lack of budget-method transparency creates practical risks:

1. participants cannot predict whether budgets will remain sufficient for intensive daily living supports, communication supports and episodic spikes in need; and
2. assessment outputs may unintentionally constrain planning decisions rather than inform them, limiting the ability of planners and review bodies to ensure participants receive funding sufficient to meet **reasonable and necessary support needs**

This reflects a broader system design principle highlighted throughout this submission: planning frameworks must be designed to recognise diverse support needs rather than expecting participants to adapt to rigid system parameters.

Without this information, participants may also find it difficult to understand or challenge planning decisions where funding allocations appear inconsistent with their assessed support needs.

Transparency in the translation of assessment findings into budgets is essential to maintaining both participant confidence and procedural fairness within the planning framework.

The planning rules therefore represent an important opportunity to clarify how assessment outputs translate into participant budgets and to ensure transparency in funding decisions.

Recommendation 20: Budget Methodology Traceability Timeframe

Resolve prior to the Scheme's framework reforms the information request regarding the budget methodology and publish sufficient operational detail to allow stakeholders to understand how assessment findings translate into participant budgets.

“NDIA hasn't provided clear answers about how much human intervention there will be in the process once the Needs Assessment data are entered into the I-CAN assessment tool.”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb '26)

“Ensure that both the Notice of Impairments and the Needs Assessment reflect the needs of the autistic participant and not some cookie-cutter template before the budget is generated.”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb '26)

10.3.2 Consultation Question (Step 3 - List of Stated Supports)

Do you have concerns or questions about the list of stated supports?

The introduction of **stated supports** may protect funding for essential services such as behaviour support, assistive technology and support coordination being unintentionally traded away under pressure. However, stated supports also create risks if the list becomes too broad or definitions are unclear.

Potential issues include:

- a. reduced flexibility in how participants use their funding
- b. service gaps where providers are unavailable
- c. rigid definitions that prevent safe substitution between supports.

Recommendation 21: Stated supports design safeguards

Stated supports design safeguards should:

- a. Keep stated supports **minimal, time limited where appropriate, and clearly justified**
- b. Publish **plain-language definitions and examples**
- c. Create a **participant-request pathway** to change how a support is funded where flexibility is safe
- d. Ensure “stated” funding still supports **choice of provider and delivery model** unless clearly justified by safety or integrity considerations.

“Flexible should mean flexible and not restricted”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb '26)

Additional design safeguards may also be required to ensure that **definitions of assistive technology, home modifications and other supports** do not unintentionally restrict access to everyday disability supports.

Recommendation 22: Assistive Technology Definitions

Clarify assistive technology and related support definitions within the planning rules to ensure low-cost everyday disability supports, commonly used by Autistic participants, remain accessible through flexible funding.

Recommendation 23: Limited, Justified and Reviewable

Require stated supports to be limited, clearly justified and reviewable.

Recommendation 24: Rights based Justification Test

Require a rights-based justification test for any stated support category and require participant-facing reasons and review rights where stated supports are applied.

10.3.5 Plan Variations as a Default

Step 4 states that rules will set out when the NDIA can vary a plan without a new Needs Assessment, including crisis funding and assistive technology repairs or replacements.

For many Autistic participants, rapid plan adjustments can prevent avoidable escalation to crisis services or family breakdown.

Recommendation 25: Plan Variation as a Default

Rapid plan adjustments are important to prevent avoidable escalation to crisis supports. The importance of accessible plan variation pathways is discussed further in Section 10.4 (Recommendation 10.4.3).

10.4 Using a Plan

Effective implementation of plans is essential to ensuring participants can use their supports safely and flexibly. Participants must be able to understand how their plan operates, how funding can be used, and how changes can be made where circumstances evolve.

10.4.1 Effective Plan implementation

Participants should be supported to implement their plans effectively. Clear information should be accessible not only to participants but also to their formal and informal supporters.

Recommendation 26: Participant Information for effective plan implementation

Provide clear guidance explaining how plans operate in practice. This should:

- a. explain how flexible funding can be used
- b. explain when supports are stated versus flexible
- c. explain how participants can change supports over time
- d. be accessible to participants and their formal and informal supporters.

“Longer funding periods would make plans easier to use.”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb '26)

10.4.2 Funding periods

The NDIA’s published guidance indicates funding periods will usually be set at three months before tailoring to individual circumstances. NDIA data suggests that many participants have already had three-month funding periods applied since May 2025.

Short funding periods can disadvantage participants whose support needs fluctuate over time. Autistic participants may be particularly affected where costs are front-loaded (for example after provider collapse) or where episodic deterioration such as burnout requires temporary increases in support intensity.

Restrictions on flexible funding should be used cautiously and only where clearly necessary for safety or integrity reasons. Less restrictive alternatives such as additional guidance, plan management supports, or targeted safeguards should be considered first.

Recommendation 27: Funding periods

Make funding periods determined in consultation with participants. Where system defaults are required, longer periods (for example 12 months) should be the starting point, with shorter periods used only where there is clear evidence of risk or participant preference.

“Longer funding periods, let participants use their own reports from doctors, specialists etc.”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb '26)

10.4.3 Plan Variations

The framework allows plans to be varied without requiring a full reassessment. This approach can reduce administrative burden and allow supports to adapt more quickly to changing circumstances.

Plan variation processes must be transparent and accessible, so participants understand how to request changes and what evidence is required.

Recommendation 28: Plan Variations as the Default

Make:

- a. plan variation the default pathway for most changes in circumstances, with full reassessments the exception
- b. reassessment required only where the NDIA provides clear evidence that a full reassessment is necessary
- c. transparent reasons provided if a variation request is refused.

“I find lengths of plans strange because autism is a lifelong condition, you can’t cure it, so why do you have to reassess it and go through this stressful process over Andover (sic) again”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb '26)

“Plan variations are rejected without people knowing why or what evidence is needed.”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb '26)

“Just as PWD have experienced... the lack of processes... plan variation... rejected without knowing why is a huge concern.”

(Source: anonymous respondent to Australian Autism Alliance community engagement Feb '26)

10.4.4 Consultation question: Communicating the New Rules

“What do you think is the best way to explain the new rules to people?”

The most effective communication approach should be calm, staged and practical. Many participants will not transition immediately and require reassurance about what the reforms mean for them.

Community feedback suggests a communication package would be helpful.

Recommendation 29: Communication Pack

Create a communication pack with the following as a minimum:

- a. **a clear “What changes for me?” pathway** explaining timing, eligibility, and what participants need to do.
- b. **worked examples:** showing how plans may operate under the new framework (see worked examples section below).
- c. **participant checklists** for preparing for assessment.
- d. **accessible resources** including Easy Read, Auslan, translated resources and visual guides.
- e. **clear explanations** of review rights and replacement assessment processes.

10.4.5 Consultation Question (Cross-cutting across all steps)

Is there anything else the Department should consider for the new rules?

This is the core of our submission. It covers budget transparency, assessor capability, safeguards, rights, restrictions/funding periods, and transition sequencing, particularly for Autistic participants.

Key cross-cutting issues include:

- a. **Budget methodology transparency gap:** stakeholders are asked to comment on a system whose budget methodology rules are not yet public in full; the Step 3 factsheet acknowledges more information will be published.
- b. **Tool validation across autism and other cohorts:** sector feedback asks for evidence of testing and suitability.
- c. **Automation transparency and reviewability:** There is a need for transparency, safeguards and the ability to meaningfully challenge outcomes, particularly if automated decision-making is used in budget allocation.

These issues are interconnected and reflect a broader structural shift in how planning decisions may be made under the proposed framework.

Under the proposed framework, participant budgets will be derived using a defined budget methodology informed by the Support Needs Assessment. This represents a structural shift in planning decisions. Where budgets are generated through a methodology, it will be important to ensure that review processes allow consideration not only of whether the methodology was applied correctly but also whether the resulting funding allocation is sufficient to meet the participant’s reasonable and necessary support needs.

10.4.5.1 Governance and Procedural Safeguards

Autistic participants and families require clarity about transition processes, notices and correction pathways.

Participants transitioning to the new framework will receive transition notices and Notices of Impairments identifying impairment categories relevant to planning. Because these notices are not reviewable, clear communication and correction pathways are essential.

Participants should be able to understand:

- what the Notice means in practical terms
- how impairment categories influence planning
- how corrections can be requested.

(These issues are discussed further in Section 9 regarding consultation integrity and transition safeguards.)

10.4.5.2 Worked Examples and Current vs Proposed Comparisons

The following case studies illustrate how the proposed framework may operate for different autism profiles and highlight system design risks that should be considered during implementation.

They demonstrate why assessment tools and planning processes must be capable of recognising complex communication needs, fluctuating capacity and environmental barriers.

These examples are illustrative and based on published materials describing the proposed framework.

Comparison table of core features

Planning feature	Current (old framework plans)	Proposed (new framework plans)	Known from published material	Critical unknowns (request disclosure)
Funding structure	Line-item supports and categories	Whole-of-person budget with flexible funding + stated supports	Flexible funding can be spent on NDIS supports (subject to restrictions)	Full budget methodology rules and how assessment outputs map to \$
Assessment basis	Evidence gathering + variable tools	Support Needs Assessment using ICAN v6 basis + questionnaires + targeted modules	NDIA states ICAN v6 basis, with trained accredited assessors	Validation studies by cohort; auditing for bias/fairness; assessor minimum standards
Plan length	Often 12 months frequent reviews	Longer-term plans contemplated; flexible funding periods max 12 months	“Longer-term (up to 5 year) plans” referenced; funding periods used to prevent running out early	How multiyear plans interact with annual price changes, life transitions, and service gaps
Funding periods	Less formalised; managed by plan categories	Funding periods for flexible funding and stated supports; can be varied	Too short periods may be inappropriate for episodic impairments	Default funding period settings; safeguards against undershooting for fluctuating needs



Planning feature	Current (old framework plans)	Proposed (new framework plans)	Known from published material	Critical unknowns (request disclosure)
Restrictions	Possible controls; inconsistent practice	Restrictions may be imposed (harm risk, noncompliance, participant request, etc.)	Restrictions described and circumstances outlined	How frequently restrictions will be used; appeal/variation pathways; safeguards against restricting essential therapies
Review focus	Often disputes over specific items	Review focuses on assessment accuracy and correct budget methodology application	Review fact sheet explains changed focus	Ability to challenge budget adequacy where method yields insufficient supports

POLICY STRESS TEST - CASE STUDY 1: Autistic adult with high support and complex communication needs

Profile (illustrative): 28-year-old Autistic adult with intellectual disability, limited verbal communication, sensory sensitivity, behaviours of concern, and high daily support needs.

Supports likely involved (based on published “stated” examples):

- Behaviour support (stated)
- Support coordination (stated)
- Assistive technology assets (stated; AAC device)
- In-home and community supports (flexible funding example)
- Short term respite (stated)

System risk:

Structured assessment tools may underestimate support needs where communication barriers, masking behaviours or unfamiliar environments prevent participants from fully communicating their functional support needs.

Key Risk:

If the assessment fails to capture communication and supervision needs, funding may be insufficient to support safe participation. This could look like unsafe support ratios, increased restrictive practice risk, carer burnout, and increased hospitalisation.

Recommendation 30: Profile Safeguards

Develop guidance recognising distinct participant personas to ensure assessment safeguards address diverse support profiles.

Recommendation 31: High Support and Complex Communication Needs

Introduce safeguards including:

- mandatory **multiple-session option** and specific accommodations for sensory/communication needs.

- required involvement (with consent) of key supporters who understand communication and daily functioning.
- draft report verification before budgeting.
- funding periods capable of accommodating episodic support spikes.

POLICY STRESS TEST - CASE STUDY 2: Autistic child requiring early intervention and family supports

Profile (illustrative): 6-year-old Autistic child with high sensory needs, communication delays, and school participation barriers; and family sustainability measures (parent coaching and respite).

System risk:

Assessment tools that are not validated for children or that rely heavily on parent reporting without recognising family sustainability risks may underestimate the level of disability support required to maintain safe participation in education and community settings.

Key Risk

- If child-specific assessment tools are not validated before rollout, children may be incorrectly assessed.
- If “informal supports” are treated as budget offsets without recognising sustainability, families can be pressured toward unsafe caregiving loads

Recommendation 32: Early Intervention and Family Support

Introduce the following safeguards:

- a. do not transition child until the child assessment tool and process are validated and co-designed, with clear safeguards and family sustainability measures.
- b. publish how informal supports influence budgets.
- c. provide accessible navigation support for families. Provide strong, accessible implementation support (navigators/coordination), especially at school transitions and family crisis points.

POLICY STRESS TEST - CASE STUDY 3: Autistic adult with fluctuating needs

Profile (illustrative): 35-year-old Autistic person with co-occurring psychosocial disability and episodic deterioration.

System risk:

Assessment processes that capture support needs at a single point in time may underestimate episodic deterioration, burnout cycles or fluctuating psychosocial needs, leading to funding allocations that do not reflect real-world variability in support requirements.

Key risk:

Rigid funding periods may prevent participants accessing increased supports during periods of crisis.

Recommendation 33: Adults with Fluctuating Needs

Introduce the following safeguards:

- a. allow flexible funding periods capable of responding to episodic support needs
- b. ensure plan variations can be accessed quickly where needs change

10.4.5.3 Operational Information Required

The Alliance supports reform that genuinely improves consistency, transparency and participant experience. But the new framework will only succeed if it is **operationally clear, validated across cohorts (including diverse autism), and protected by strong, accessible safeguards**—especially in the budget methodology, assessment report accuracy, and reviewability of outcomes. With certain operational elements remaining unavailable in the consultation materials, publication of this information is necessary for stakeholders to meaningfully assess the proposed framework (refer Section 8 for the list).

System Design Implication

Transparency in how assessment findings translate into plan budgets is essential to maintaining confidence in the NDIS planning system. **Without clear traceability** between identified support needs and funding outcomes, **participants cannot meaningfully understand or challenge planning decisions.**

11 Transition and Implementation

The new framework will be introduced in stages:

- participants aged 16+ from July 2026
- participants under 16 from July 2027

This staged approach is appropriate.

However, transition communications should provide certainty and predictability.

Participants should receive clear advance notice of transition timelines. A minimum notice period—such as six months—would allow participants, families and providers to prepare for the new planning framework and reduce uncertainty during the transition process.

Recommendation 34: Transition and Implementation Transparency

Facilitate transition and implementation transparency by:

- a. publishing minimum transition notice periods
- b. clearly explaining cohort selection criteria
- c. ensuring child-appropriate assessment processes are validated before implementation

12. Implementation success factors

Effective reform requires systems that recognise diverse support needs rather than expecting participants to adapt to rigid processes.

Successful implementation of the new planning framework will depend not only on policy design but also on operational clarity and system readiness. Several implementation factors will be particularly important:

- a. early publication of operational rules and budget methodologies
- b. clear procedural safeguards during the assessment process
- c. assessor capability and disability-competent practice
- d. transparent links between assessment findings and participant budgets
- e. monitoring of early implementation outcomes and participant experience

Addressing these areas during rule development and early implementation will help ensure the framework delivers fair, transparent and sustainable outcomes.

The Alliance recognises the Government's intention to introduce the new planning framework in stages. For reforms of this scale, implementation readiness is critical to ensuring the framework operates as intended. Assessment processes, assessor capability, operational guidance and participant safeguards must be sufficiently developed and tested to support consistent and fair outcomes across the diversity of NDIS participants.

12.1 Key Implementation Success Factors

The proposed planning framework represents a significant structural shift in how participant support needs are assessed and translated into plan budgets.

Focusing on system readiness helps ensure that reforms implement new processes consistently across diverse participant cohorts and deliver the intended improvements in transparency, consistency and participant experience while reducing the risk of unintended consequences during early implementation.

The success of the new planning framework will depend on the implementation of the system design principles outlined earlier in this submission.

Ensuring that these principles are applied during implementation will help the framework deliver its intended benefits for participants and the broader NDIS system

These implementation considerations reinforce the importance of ensuring that the planning framework is designed to accurately recognise participant support needs, rather than expecting participants to adapt to rigid system processes.

12.2 Forecasting support needs for autism

Effective system planning benefits from reliable population-level evidence about disability prevalence and support needs.

Participation trends within the NDIS highlight the importance of accurate forecasting of disability support needs across the Australian population. Autism presents particular forecasting challenges because of the diversity of support profiles involved and the evolving understanding of neurodevelopmental conditions within the community.

While autism participation within the NDIS has increased in recent years, national data on autism prevalence across the Australian population remains limited. Strengthening the evidence base through national epidemiological research would help support long-term planning of disability supports, help improve understanding of participation trends within the Scheme and strengthen evidence-informed policy development.

Strengthening the evidence base through improved prevalence data, longitudinal research and service utilisation monitoring will support more accurate forecasting of support needs and help inform long-term planning of disability systems

The National Autism Strategy First Action Plan includes a commitment to develop a national autism epidemiological research strategy, which will be an important step in strengthening the evidence base for long-term policy and service planning.

Recommendation 35: Accelerate National Autism Strategy Research commitment

Accelerate the commitment to develop a national autism epidemiological research strategy in the National Autism Strategy First Action Plan to strengthen the evidence base for long-term system planning.

Recommendation 36: Strengthen National Data on Autism

Strengthen national data on autism support and service needs to support more accurate long-term forecasting of disability system demand.

13 System Governance

Large-scale reforms such as the new planning framework benefit from structured feedback loops during implementation. Establishing mechanisms to monitor outcomes and incorporate lessons from early implementation will help ensure the framework continues to improve over time.

13.1 Assessment quality assurance

As the Support Needs Assessment will play a central role in determining participant budgets, the consistency and reliability of assessments will be critical.

Recommendation 37: Assessment Quality Assurance

Establish clear quality assurance mechanisms for assessments, to support confidence in the framework, including:

- regular auditing of assessment reports
- oversight of assessor performance and training
- processes for identifying and addressing systematic inconsistencies across assessors or regions.

Providing transparency about these mechanisms would help ensure that assessments are applied consistently and fairly across the participant population.

13.2 Data Monitoring and Fairness Checks of Planning Outcomes

As the new framework introduces a structured assessment process and defined budget methodology, it will be important to monitor outcomes to ensure that the system is operating fairly.

Recommendation 38: Publish Planning Outcomes

Publishes aggregated data on planning outcomes across different participant cohorts and regions to support transparency and identify any unintended disparities.

13.3 Early implementation review

Given the scale of the proposed changes to the planning framework, an early implementation review could provide valuable insights into how the framework is operating in practice.

Recommendation 39: Early Implementation Review

Undertake an early implementation review be conducted after the initial implementation period to examine:

- participant experiences of the assessment process
- consistency of planning outcomes
- effectiveness of safeguards such as replacement assessments and plan variations.

Findings from such a review could inform further refinement of the framework as it is rolled out across the Scheme.

14 Conclusion

The Alliance supports reforms that improve transparency, consistency and participant experience. However, the new framework will only succeed if assessment processes are validated, budget methodology is transparent, and participants retain meaningful safeguards.

Without these safeguards the new framework risks undermining confidence in the planning system and may unintentionally leave participants worse off.

Consistency must never come at the expense of recognising individual needs. Structured assessment tools can improve fairness and transparency, but only when they are implemented with appropriate safeguards, independent validation and meaningful involvement of the disability community.

The Alliance brings together national expertise in autism policy, lived experience and service systems. We welcome the opportunity to continue working with government and the NDIA to ensure the planning framework delivers fair, transparent and sustainable outcomes for Autistic Australians.

Ensuring that the new planning framework can accurately recognise the diversity of autistic support needs will strengthen its effectiveness for the broader NDIS participant population. With appropriate transparency, safeguards and validation, the proposed planning framework has the potential to strengthen consistency while preserving the core principles of the NDIS.

The success of the new planning framework will depend on designing systems that recognise the diversity of disability support needs.

The recommendations in this submission are intended to assist government to implement the new planning framework in a way that strengthens transparency, safeguards participant rights and supports sustainable Scheme outcomes.

This submission reflects the Alliance's core reform principle:

Change the System, Not the Person.