

The introduction of defined NDIS supports, funding amounts, funding periods and funding components – Early observations on implementation

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Policy, Evidence and Practice Leadership Division

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This document

This report presents early observations on implementation of amendments to Section 10 (NDIS supports) and Section 33 (Funding periods) of the *National Disability Insurance Scheme Act 2013*. The report also suggests ways to better support ongoing implementation of the changes and identifies areas of participant experience to be further explored in subsequent evaluation phases. Given the early stages of the evaluation, this report does not make any conclusive findings.

Contributors

The National Disability Insurance Agency's (NDIA) Participant Outcomes, Evidence and Evaluation Branch delivered this report.

Disclaimer

The NDIA disclaims all liability to any person in respect of anything, and of the consequences of anything, done or omitted to be done by any such person in reliance, whether wholly or partly, upon any information in this report.

Material in this report is available on the understanding that the future decision-making or changes to National Disability Insurance Scheme (NDIS) processes are subject to information additional to this report. Views and recommendations in this report do not necessarily indicate a commitment to a particular course of action.

Acknowledgements

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The NDIA would like to acknowledge all who assisted in the development of this report. This includes NDIS participants and their informal supporters, participant representatives, Disability Representative and Carer Organisations (DCROs), Disability Advocacy Network Australia, and Service Delivery staff.

Abbreviations and terms

Amendment A change to a parliamentary Bill (a proposed law)

DANA Disability Advocacy Network Australia

DRO Disability Representative Organisation

DRCO Disability Representative and Carer Organisation

DSS Department of Social Services

FAQs Frequently Asked Questions

NCC National Contact Centre

NDIA National Disability Insurance Agency

NDIS National Disability Insurance Scheme

PACE Participant Alternative Cloud Environment

Provider Individuals or organisations that deliver a support or service to an NDIS participant

RPF Reform Policy Forum

Rule Legislative instruments under the NDIS Act. There is a Transitional Rule which relates to s10, and a determination which relates to s33.

s10 Section 10 of the National Disability Insurance Scheme Act

s33 Section 33 of the National Disability Insurance Scheme Act

SLT Senior Leadership Team

SME Subject Matter Expert

STAs Short Term Accommodation

TAPIB Technical Advice and Practice Improvement Branch

Executive summary

The *National Disability Insurance Scheme Amendment (Getting the NDIS Back on Track No. 1) Act 2024* (Amending Act) introduced amendments to Section 10 (s10) and 10 and Section 33 (s33) to return the Scheme to its original intent and support greater clarity for participants to make the best use of their funding.

Two legislative instruments were introduced to give effect to these amendments:

- s10: *National Disability Insurance Scheme (Getting the NDIS Back on Track No. 1) (Miscellaneous Provisions) Transitional Rules 2024* (commenced 3 October 2024)
- s33: *National Disability Insurance Scheme (Old Framework Plans) Determination 2024* (commenced 9 October 2024).

Early observations on implementation of NDIS Supports (s10) and Funding periods (s33)

Observation 1: The amendments generated uncertainty and anxiety among some participants, particularly in relation to the NDIS Support Lists

The amendments, particularly the NDIS Supports Lists, generated uncertainty and anxiety among participants. This was due to confusion about the changes, lack of specific information about items of the NDIS Supports List, and misinformation on social media. The number of clarifications issued by the Agency about the Supports List further contributed to participant confusion and anxiety.

Observation 2: There was an increase in participant and stakeholder interaction with the Agency

There was an increase in interactions with the National Disability Insurance Agency (NDIA, or Agency) as a result of the NDIS Supports and Funding period changes in the three months following implementation, and a number of outbound communication channels were used to ensure participants and providers were aware of the changes. Interactions peaked immediately following the changes coming into effect and declined over time.

Observation 3: Workforce training and resources for frontline Agency staff were well received initially, but did not fully prepare staff for the application of the changes

Training and resources for frontline staff began in June 2024 and continued after 3 October 2024. Initial e-learning and facilitated sessions were effective, but

implementation revealed gaps in knowledge and skills, necessitating additional guidance and resources.

Observation 4: Some claims have been rejected as non-compliant with s10, though more data is needed

There was limited administrative data available for this report relating to the number of claims non-compliant with s10. However, available data indicates that there are a low number of claims deemed to be non-compliant with s10.

Non-compliant claiming will be further examined over 2025, including the nature of claims and changes in claiming patterns and behaviours.

Observation 5: Applications for replacement supports were low

Interactions regarding replacement supports were initially low. Application rates grew slowly in October but increased rapidly in November, leading to a temporary backlog of requests. By 10 January 2025, there had been 611 requests for replacement supports, with 111 approved and 380 still pending. Most requests related to tablets, communication apps, smart devices, and household items, with approximately 20% of requests either declined (10%) or invalid (10%).

Early data showed that 43% of requests came from participants with global developmental delay or autism, aligning with their representation among NDIA participants. Additionally, 11% of requests were from participants with hearing loss, higher than their cohort representation (3%), often for technology to support communication.

Observation 6: More detailed information and clarifications were required to support implementation

The demand for more detailed information on the amendments from participants and sector resulted in a continuous system of updates and advice for internal and external audiences. Since 3 October 2024, the NDIA published approximately 50 clarifications (guidance, FAQs etc) on a range of matters.

Many of the issues raised through implementation required the Agency to develop clarifications relating to a range of NDIS supports, some of which remain under development.

Observation 7: The Agency responded to known issues quickly, though responses were not always well-coordinated

The Agency attempted to resolve issues in a timely way, but given the pace of change there was not always time for adequate coordination or communication across the Agency. Guidance (FAQs, Operational Guidelines, knowledge articles)

and information resources to assist staff to operationalise the changes were largely developed after the changes had come into effect.

There was strong commitment to implementation among Agency staff, and the readiness of Agency leadership and other structures to resolve issues quickly supported implementation. Agency staff also reflected that strong relationships with the disability community were enabling the implementation, even at pace.

Observation 8: Some preparation, systems and processes were not all in place by day one

The NDIS Supports Lists were finalised on 2 October 2024 and implemented the next day. High engagement from participants, providers, and the disability sector, along with increased media attention, highlighted the need for more detailed information and support than could be produced immediately. The implementation issues underline the necessity for longer lead times to fully prepare and communicate the specifics of the changes.

Key areas needing improvement included comprehensive training for staff, better communication, and inclusive engagement with stakeholders. Some guidelines, resources and systems were not ready by the implementation date, and there was some reliance on manual processes. The Agency has identified priority areas to address these challenges in 2025.

Observation 9: There is more to understand about the impact of the changes on participant supports and plan management

It is unclear at this stage the extent to which participants changed their support arrangements as a result of the NDIS Supports changes. However, there were early indications that some providers and plan managers were taking a risk averse approach to the 'out' list, and where there was some uncertainty about whether a support could be funded by the NDIS, they were erring on the side of caution.

Lessons and improvement opportunities

The early implementation highlighted enablers and barriers for change:

- The importance of having pre-prepared resources and clear communication strategies in place to handle rapid changes efficiently.
- Balancing the need for responsiveness with the need for thorough planning and communication to avoid uncertainty, anxiety, and complaints.
- Maintaining strong relationships with the disability community – instrumental in the initial implementation phase, and essential for ongoing success.

- The pace of reform experience in the initial three months may not be sustainable in the long term.

Future implementation of changes could be strengthened, and risks mitigated, by:

- Ensuring sufficient timeframes to operationalise further refinements
- Better communications that further contextualise the changes within the broader intent of Scheme reform and the vision for the future of the Scheme.
- A greater emphasis on participant communication and engagement before the changes come into effect
- Involving participants and sector stakeholders more in the change process.

Next steps and areas for further exploration

The next stage of the evaluation will focus more closely on participant experience of the NDIS Supports and Funding period changes, as well as further examine implementation.

Focus on participant experience

The next stage of the evaluation will focus more closely on participant experience, including commencement of primary research with participants (both survey and qualitative interviews). This will include exploration of the extent to which participants' supports have/have not changed, changes in claims and claiming behaviour, and impacts of funding components, funding amounts and funding periods on participants' plan utilisation and spending in accordance with their plan.

Further exploration of Agency capacity and implementation

The next phase of the evaluation will also include continued monitoring of Agency implementation, primary research with frontline Agency workforce, and further sector engagement, including consultation with Disability Representative and Carer Organisations (DRCOs) and partners.

Future evaluation reports

The next evaluation summary report will be delivered in June 2025, and will focus on participant experience of the changes, risks and opportunities for support for specific groups, and ongoing monitoring of emerging outcomes for Scheme compliance, integrity and sustainability. The evaluation will continue through to December 2025, with further summary reports to be delivered in September and December 2025.

1. Introduction and context

1.1 Amendments to the NDIS Act

Recent amendments to the *National Disability Insurance Scheme Act 2013* came into effect on 3 October 2024 and were designed to further improve outcomes for participants and move towards a more sustainable National Disability Insurance Scheme (NDIS).

The Amending Act introduced a number of changes, including changes to Section 10, which defined the NDIS supports funded by the Scheme, and Section 33, which introduced total funding amounts, funding components, and funding periods into participants' plans.

Section 10: Definition of NDIS supports and transitional rules

The changes to Section 10 (s10) provide greater certainty to participants about what they can and cannot spend their NDIS funds on and seek to ensure NDIS funding is used for identified NDIS supports. Key changes were implemented through a transitional rule, and include:

- Introduction of an **NDIS Supports List**, which clearly outlines what can, and cannot, be funded as a NDIS support.
- An application process for **replacement supports** for participants who could no longer access supports which were not NDIS supports
- **Transitional arrangements** with respect to debts incurred where NDIS funding was utilised for a non-NDIS support, which meant that providers would not incur a debt where they claimed for a non-NDIS support within 30 days of s10 coming into effect, and participants would not incur a debt within the first 12 months.

Section 33: Total funding amounts, funding component amounts and funding periods

The changes to Section 33 (s33) seek to further support participants to spend in accordance with their plan, and to reduce plan over-utilisation and inflation. The change means that a participant's statement of supports, approved on or after the changes came into effect, must:

- specify a 'total funding amount' for all supports funded under the plan
- categorise participant supports into one or more groups of supports
- specify a 'funding component amount' for each group of supports

- specify 'funding periods' that funding will be available, to enable funding distribution over the plan and reduce the risk of funds being exhausted early.

1.2 Evaluating the impacts of the NDIS Supports and Funding period changes

The Agency is conducting an evaluation to understand the impacts of the NDIS Supports and Funding period changes on participant experience and outcomes, and to assess the extent to which the Agency and its systems and processes are supporting implementation. The evaluation will be used to identify opportunities to strengthen future implementation, including refinement of policy settings, guidelines, and participant communication and education.

The evaluation is being conducted over a 12-month period from October 2024 by the NDIA Participant Outcomes, Evidence and Evaluation Branch (formally the Evidence and Practice Leadership Branch), and is being supported by an Evaluation Advisory Group, comprising eight DRCOs.

Appendix A provides an overview of the evaluation scope, questions, and methods.

1.3 This report

This report provides *early observations* on implementation of the changes for the first three months (3 October to 31 December 2024), with a high-level, primary focus on insights against two key evaluation questions, and associated sub questions:

1: To what extent are the new service rules being implemented as planned?

- a) How consistently are the transition rules being applied compared to the intended process outcome (fidelity)?
- b) Are the rates of access, support inclusions, claims, rejections, and patterns of payments over time as would be anticipated by design?
- c) Are staff using the correct tools effectively to make consistent, accurate and timely decisions?
- d) Do reasons provided for approved substitutions and exemptions align with the new rules?
- e) How effectively are the compliance risk areas being identified and managed?

2: What are the challenges and enablers to implementation?

- a) How well have communications, training and guidelines assisted in understanding changes for all groups (frontline, claims/payments staff, providers, partners, participants)?
- b) Are the resources to support implementation and compliance in place and sufficient?
- c) How have the changes affected staff, partner, and provider confidence and capability in meeting participant needs and expectations?
- d) How have the implementation of the changes impacted staff workload and productivity?

- e) What has been done in an innovative way to manage implementation challenges?
- f) Are gaps and risks being identified, addressed or mitigated in systems operations?
- g) Are the lessons from implementation experience being effectively communicated and used?

The report also suggests ways to better support ongoing implementation of the changes and identifies areas of participant experience to be further explored in subsequent evaluation phases. Given the early stages of the evaluation, this report does not make any conclusive findings.

1.4 Data sources and limitations

This report outlines early observations of implementation of the changes for the first three months only and draws on selected data sources that could be readily accessed. These include:

- Agency administrative data (e.g. plans, claims, payments)
- Existing Agency surveys of participants and Agency staff
- Internal Agency consultations, including:
 - those responsible for aspects of implementation, and
 - those able to provide line of sight on frontline experiences and feedback on emerging issues or risks related to participant experience.
- Internal reports and summary documents and review papers
- Initial sector engagement (with Disability Advocacy Network Australia and seven other DRCOs).

The observations in this report do not draw on primary research designed specifically for the evaluation and instead are based on existing data sources and feedback channels. There are limitations in these sources: the evaluation team did not engage directly with participants or frontline Agency staff beyond Practice Lead staff and line managers.

In the absence of direct participant engagement, some fifteen separate primary sources (most with multiple documents or data points) were reviewed to identify early insights related to the participant experience (see Appendix A).

Purposefully designed, direct engagement with participants (to be undertaken by an independent third-party), and research with frontline Agency staff, is planned for the next phase of the evaluation. This will include both qualitative exploration and quantitative surveys.

2. Early observations on implementation

2.1 Observation 1: The amendments generated uncertainty and anxiety among some participants, particularly in relation to NDIS Supports (s10) changes

Participant uncertainty about the changes

Sector and Agency stakeholders shared the view that there was, at least in the early weeks of implementation, a high degree of uncertainty for some participants relating to the changes, predominantly related to the NDIS Supports List but also to the introduction of funding amounts and components. This was attributed to:

- confusion about what the changes were and what they would mean for their own supports, choices and flexibility.
- lack of specific information about items on the NDIS Supports List, including definitions of specific supports on 'out' list, and confusion where supports were not included in either the 'in' or 'out' list
- misinformation circulating on social media which increased anxiety and concern among participants and their support networks who were searching for clarity in online communities.

Participant confusion was further influenced by:

- the number of clarifications and announcements about the NDIS Supports List
- adequacy of information for National Call Centre (NCC) staff to enable them to confidently answer queries about new announcements and clarifications.
- mainstream and social media coverage of contentious issues, with social media commentary perceived to be “drowning out” some Agency communications seeking to clarify or correct misinformation.

Example: Announcements with immediate implications for participant supports

Inclusion of 'food and groceries' and 'transport' on the 'out list' caused considerable confusion for participants and providers in relation to short-term accommodation. Short term accommodation in a group setting, includes funding for accommodation, as well as funding for food and transport.

An FAQ was published to the website on a Friday afternoon, seeking to clarify that where short-term accommodation was being provided in an individual setting, funding could not be used for food and transport.

Agency staff received phone calls from providers who had participants booked for short-term and respite accommodation that weekend. Guidelines around short-term accommodation had not yet been finalised, and Agency staff were uncertain about how to advise providers in the immediate term.

Quote from Agency stakeholder: “Providers were asking “Do I need to cancel participant bookings I've got this weekend? How do I understand the information you put out? Am I going to get pinged for fraud or for being non-compliant if I honour bookings?”

Anxiety about Scheme reforms in general were heightened

Sector stakeholders emphasised that anxiety about the Scheme Reforms and future vision for the Scheme already existed for many participants prior to implementation of NDIS Supports and Funding period changes. The implementation of the NDIS Support Lists in particular further heightened this anxiety. Key contributing factors included:

- dissatisfaction with the consultation timeframes and process for the draft NDIS Support Lists.
- a sense that some of the changes were unanticipated – “not the change we were promised” – leading to a fear of what else might change in future (for example, the proposed changes to music and art therapy funding generating concern that additional changes to therapy might be made).
- lack of a clear understanding of the vision for the future of the Scheme and “what will it mean for me”, and a lack of a connection between the NDIS Supports and Funding period changes introduced by s10 and s33 and the broader Reform vision.

The introduction of funding amounts and components under s33 did not generate the same level of uncertainty or engagement as s10. This was attributed to:

- the funding period changes are implemented when participants have a new plan or plan reassessment (since 3 October) so many participants had not yet experienced these changes.
- shorter funding periods (than 12 months) had not yet been introduced.
- the consultation process for funding amounts and components was not as rapid nor as nuanced and detailed as the NDIS Supports List.
- the s33 changes were less immediately disruptive to participants' existing supports.

2.2 Observation 2: There was an increase in participant and stakeholder interaction with the Agency

There was an increase in interactions with the Agency as a result of the NDIS Supports and Funding period changes in the three months following implementation, and a number of outbound communication channels were used to ensure participants and providers were aware of the changes. Engagement with these channels was high. Interactions peaked immediately following the changes coming into effect and declined over time.

There were significant outbound communications from the Agency to all participants about the changes. This included:

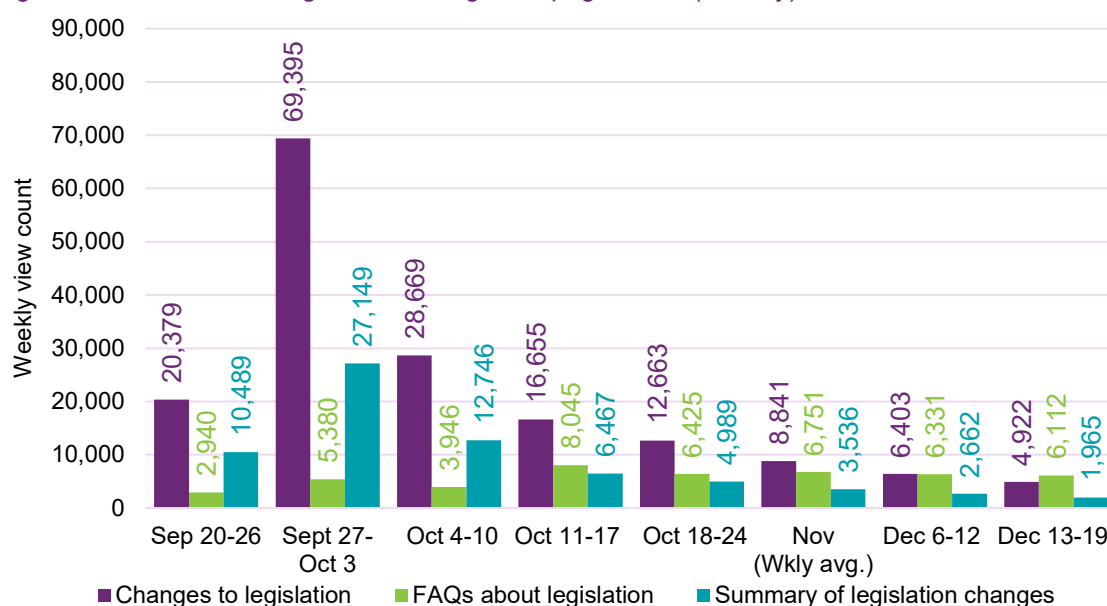
- emails and SMSs to all participants (more than 500,000) sent in the week following the changes,
- an email to more than 200,000 providers, and
- a series of eNewsletter updates providing further information about the changes were also sent to about 60,000 participants (opened by 29-38% of recipients).

There was substantial increase in use of the Agency website:

- Access peaked immediately after the changes went live and the initial emails/SMS were sent to participants.
- NDIS webpage views were highest for the week commencing 4 October 2024 – that is, the week immediately following announcement of the changes.
- Documents that outlined NDIS Supports lists were each downloaded from the NDIS website most frequently during the week commencing 4 October, and in the week immediately preceding the changes coming into effect.

Figure 1 below shows a marked increase in website usage as participants and others accessed information resources.

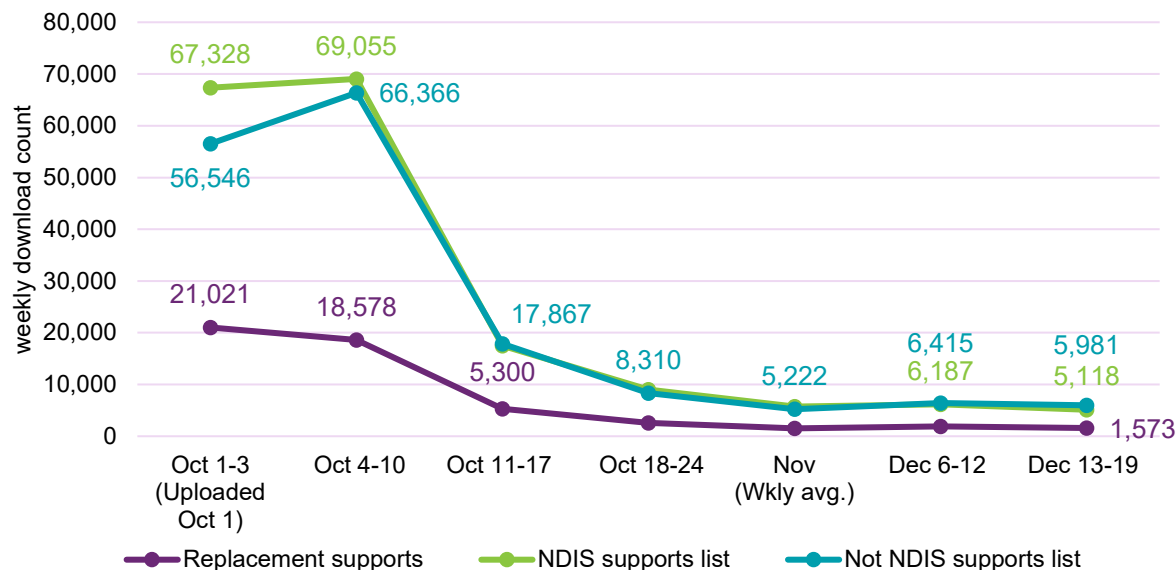
Figure 1: NDIS Website legislation change webpage views (Weekly)



Source: NDIS Legislation Strategic Communications reports 2024.

Figure 2 below outlines the number of document downloads from the Agency website for the period immediately preceding and following the changes coming into effect, by document type.

Figure 2: NDIS Website legislation change document downloads (Weekly)



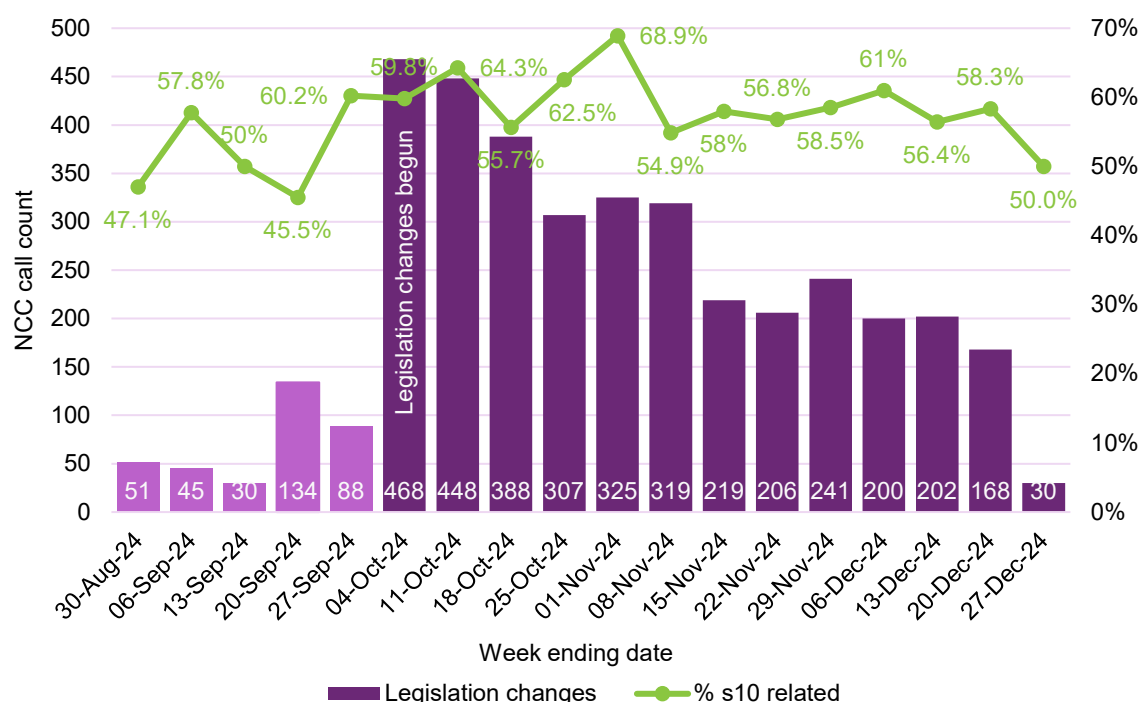
Source: NDIS Legislation Strategic Communications reports 2024.

Calls to the National Contact Centre increased. Observations included:

- Phone calls to the NCC which increased substantially from 4 October 2024 (the day after the changes came into effect), and remained high for a number of weeks before gradually declining.
- The majority of calls (55.2% on average) related to the NDIS Supports List.

This is illustrated in Figure 3 below.

Figure 3: NCC calls regarding 'Legislation Changes' and s10 changes



Source: Legislation Call Summary - NCC Branch, Integrity Transformation Division & Integrity Transformation and Fraud Fusion Taskforce Group.

Information sessions provided an opportunity for participants and providers to access further information and pose individual questions. Specifically:

- There were 42 public information sessions about NDIS supports (s10) and planning and budgets (s33) for participants held from 4th October to 20th December.
- These sessions were well attended, with a total of 4061 attendees including participants, their families and carers.
- An additional 32 sessions were held for providers, which were attended by over 5400 provider staff.

There was no overall increase in complaints to the Agency, and complaints about the legislation represented fewer than 1% of all complaints in this period. Specifically:

- There were 185 legislation-related feedback/complaints received from 3rd October to 31st December 2024, of which 70% were related to the NDIS Support Lists, and 6% were related to funding amounts and components.
- There was a notable spike in legislation-related complaints on 6th December (27 feedback/complaints – 3.15% of all complaints), one week following announced changes to pricing for music and arts therapy.

Figure 4 below shows the total number of complaints the Agency received weekly and the proportion of these complaints that were related to 'legislation changes'.

Figure 4: Number and percent of 'Legislation Change' complaints cases from PACE



Source: NDIS Datawarehouse Feedback and Complaints daily data using "HotCode" designations.

There was significant informal engagement relating to the changes. Agency staff across many branches recounted high levels of stakeholder interactions relative to their 'business as usual', including fielding queries and informal complaints, resolving issues, responding to stakeholder contacts, and responding to correspondence to the Minister or CEO.

Agency communications and information was frequent though did not always meet participants' needs

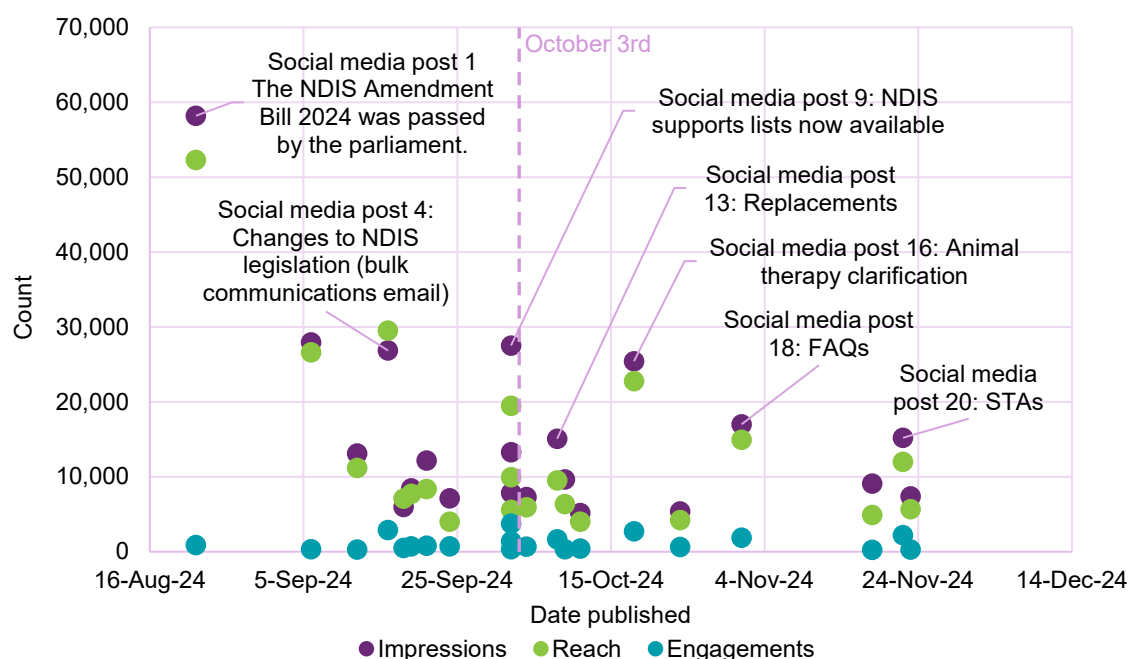
There was a view among external stakeholders that the Agency's communication and information provision, while frequent, did not meet some participants' needs. Specifically:

- Given some guidance was still under development in the first three months, engagement was not always supported with the specific information that was being sought by participants and providers.
- While the Agency was responsive and communications were frequent, there was a view that communications were often general in nature.
- There was a risk of generating further frustrations for participants when the Agency had no new information to share or when participants' concerns had not been considered.

The Agency used a number of information channels to provide information. Figure 5 below shows that social media channels had the most reach and engagement when

FAQs were released, particularly those related to issues such as short-term accommodation (STA) and various therapies.

Figure 5: Strategic Communications – Social Media Activity



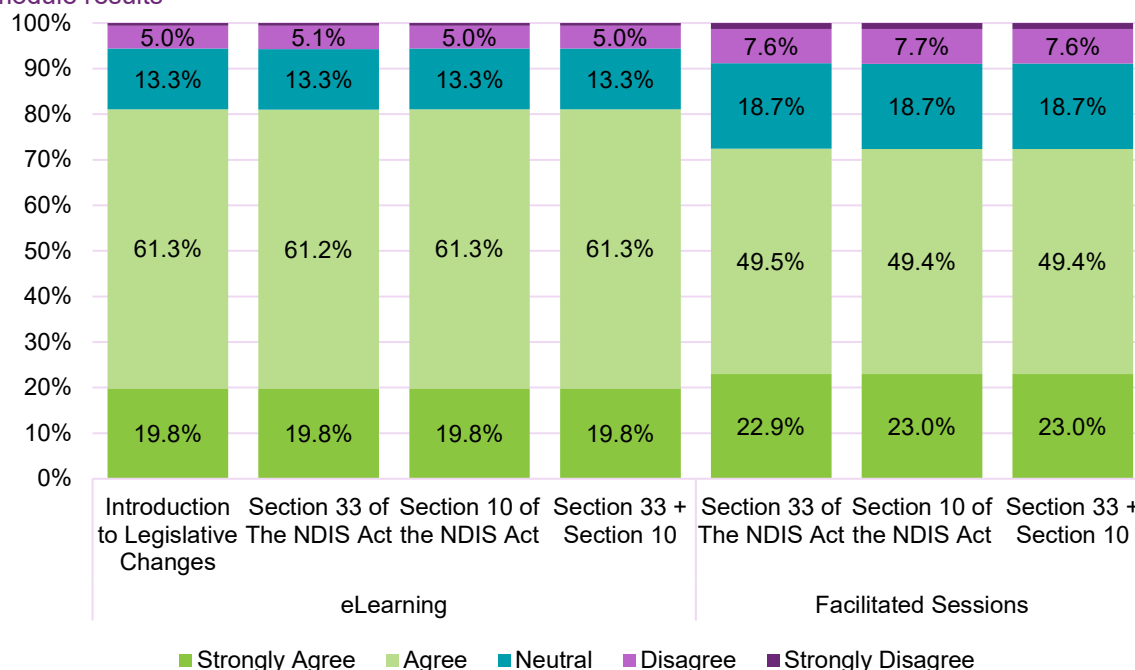
Source: Strategic Communications Branch, External communications activities – Social Media Activity

2.3 Observation 3: Workforce training and resources for frontline Agency staff were well received initially, but did not fully prepare staff for the application of the changes

A range of training and resources were delivered to frontline staff from June 2024:

- Staff consultation and general training on the legislative amendments began in June 2024. Most frontline Agency staff had accessed training (80%) by 31 October 2024.
- Initial e-learning training was effective at building knowledge of the changes (81% of staff 'agreed' or 'strongly agreed')
- Feedback immediately following the training sessions showed the majority of staff agreed that the facilitated sessions were effective in building their ability to apply the changes (72% either strongly agreed or agreed). These findings are illustrated in Figure 6 below.

Figure 6: 2024 Legislative changes training evaluation survey – ‘eLearning’ and ‘Facilitated Session’ module results



Source: Scheme Reforms and 3P Transition Branch – “Learning, Change, and Communications of the Tranche 1 Legislation Changes Survey”. Notes: Anonymous survey conducted November 2024 (N= 499). Survey Questions: eLearning = “eLearning modules were effective in building my knowledge of Legislative Changes”, and Facilitated sessions = “facilitated sessions were effective in building my ability to apply Legislative Changes”

From day one, implementation exposed some gaps in the knowledge and skills necessary to apply the changes in nuanced circumstances, and the Agency was not able to fully meet the considerable demand for additional guidance from frontline Agency staff. The Agency later developed additional guidance and resources for frontline Agency staff, including:

- Additional online training resources including more nuanced case examples. These additional modules were optional for frontline staff.
- Specific operational guidelines (OGs) and resources, such as knowledge articles. Guidelines and resources continued to be updated as a result of issues raised by participants, provider and sector representatives, and following release of FAQs and clarifications by the Agency.

FAQs were reported to have become a preferred information source for frontline Agency staff as they could access and show them to participants in planning conversations to provide advice and clarity.

Video training resources supporting elements of s10 changes were paused while clarifications were developed.

2.4 Observation 4: Some claims have been rejected as non-compliant with s10, though more data is needed

There was limited administrative data available for this report relating to the number of claims non-compliant with s10. However, available data indicates that there are a low number of claims deemed to be non-compliant with s10. For example, only \$1.3 million in claims made by self-managed participants were found to be for non-NDIS supports in the period from 3 October to 12 December 2024.

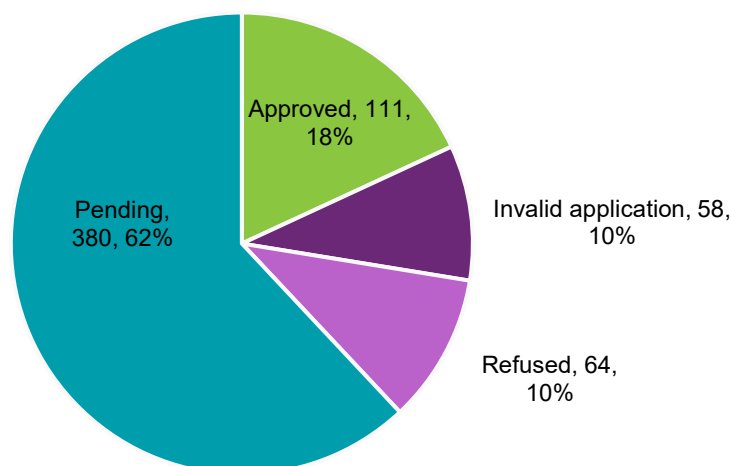
Non-compliant claiming will be further examined over 2025, including the nature of these claims (that is, what they were for), how claiming patterns and behaviours have changed; and the extent to which participants' supports have/have not changed.

2.5 Observation 5: Applications for replacement supports were low

Interactions with the Agency related to replacement supports were relatively low in the first three months following the changes:

- The first valid application for a replacement support was received by the Technical Advice and Practice Improvement Branch (TAPIB) two weeks after the changes came into effect.
- Rates of applications grew slowly during October and then increased rapidly in November.
- The National Contact Centre, who triage and refer the majority of replacement support applications, reported a backlog of requests during November.
- There were no reported issues with assessment of requests for replacement supports, and assessment resources were adequate.
- As at 10 January 2025, there had been 611 requests for replacement supports, of which 111 (18%) had been approved, and 380 (62%) still had a decision pending (as illustrated in Figure 7 below).

Figure 7: Replacement support decisions



Source: NDIS Strategic Projects, Technical Advice and Practice Improvement Branch, Replacement Supports Data Tracker

Most replacement supports requests related to tablets, apps for communication and accessibility, smart watches, smart phones and standard commercially available household items.

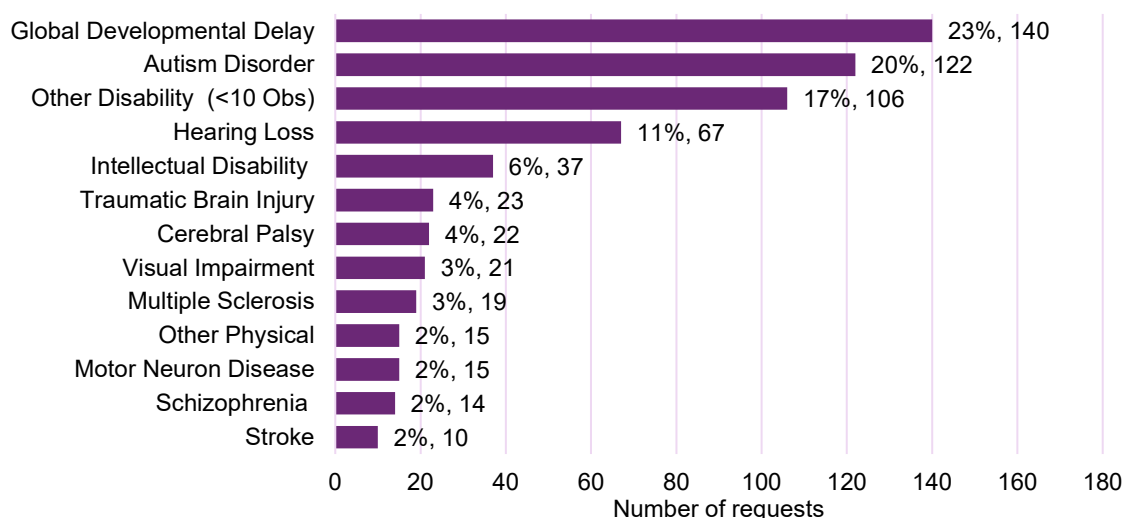
Approximately one in five replacement requests were declined or refused. More specifically:

- 10% were declined and were for tablets, smart phones or smart watches, and standard household items (27% of which requested to replace their 'capacity building – improved daily living' support budgets).
- 10% were 'invalid applications', half of which (52%) were invalid because the request identified 'no budget to replace'.

Analysis of early replacement support application data (see Figure 8) revealed:

- 43% of requests were made by participants with a global developmental delay or autism, which is broadly in line with the distribution of disability types among NDIA participants.
- 11% of requests were made by participants that experience hearing loss – higher than their representation in the participant cohort (3%). Their requests were generally related to technology to support translation and communication.

Figure 8: Participant requesting replacement support by disability type



Source: TAPIB Replacement supports data monitoring data. Note: category listed as “Other (<10 obs)” refers to the collective group of all disability types that are listed with less than ten observations. Data as of 10th January 2025 (N=611).

Participant experience of the replacement support process has not been examined (and will be a focus of later stages of the evaluation). However, feedback from Practice Leads and Agency stakeholders indicates:

- There was confusion about whether a replacement support should or could be requested, and the evidence required to support the request.
- There has been some inconsistent advice provided to participants by Agency planners and providers about when the replacement support process could be used.

A Replacement Support working group was set up to review the replacement support process, guide refinements to the process, and identify where additional guidance for providers and planners might be required.

2.6 Observation 6: More detailed information and clarifications were required to support implementation

A number of issues relating to interpretation and clarity of the lists were raised within the Agency. The Agency’s Implementation Support Group and Practice Leadership Network identified more than 40 areas for resolution within the first few weeks.

There was a need to provide some urgent clarifications as Agency staff, participants and providers sought more specific understanding of the NDIS Supports List through nuanced, personal case examples.

The demand for more detailed information on the amendments from participants and sector resulted in a continuous system of updates and advice for internal and external audiences.

The scale and pace of activity reached a peak in November 2024, though it has since declined as the Agency provided a number of clarifications and issued FAQs. Since 3 October 2024, the NDIA had published approximately 50 clarifications (guidance, FAQs etc) on a range of matters.

A significant proportion of these information products were not available until into the later months of 2024, with more updates planned for release in 2025. Some issues remained unresolved at 31 December 2024, as clarifications continue to be developed.

Of the many of the issues raised through early implementation, examples included:

- Various supports which intersected with other service systems, such as:
 - continuous invasive ventilation, provision of concurrent supports in hospital, palliative care and chronic health conditions
 - transition to community and access to community services
 - disability specific programs and in-kind arrangements in early childhood services.
- Specific supports which were perceived as being both on the 'in' list and the 'out' list, such as use of tablets (on the 'out' list) embedded in assistive communication devices (on the 'in' list).
- Therapeutic supports, which under s10 must be evidence-based.

Quote from Agency stakeholder: "Planners and practice leads have asked for clarification; "What is an evidence-based therapeutic support? Can the Agency provide a list for clarity? Can you provide concrete examples of what can be funded? How do we know that the therapy that is being provided is an approved and endorsed therapy?"

There were also a number of common questions and queries about whether (and in what circumstances) a support would be funded by the NDIS – for example, questions were raised concerning:

- components of STA, where it was not provided as a holistic service by a single provider, such as funding for third party accommodation (hotels etc), flights and travel costs, meals
- communication devices and assistive technology, sensory items
- assistance animals
- home modifications, maintenance of household pools, cleaning and gardening for children (under 18 years of age)

- allied health/therapy types not mentioned on the 'in' or 'out' list (e.g. chiropractic)

Some clarifications remain under development, including those relating to assistive and augmented communication devices, STA provisions (including clarifying the purpose of STA and when it can be used) and a number of Home and Living supports.

Additional policy work is also being conducted – for example, to further define evidence-based therapy and specify the types of therapy the NDIS will and will not fund.

2.7 Observation 7: The Agency responded to known issues quickly, though responses were not always well-coordinated

The Agency largely resolved issues in a timely way but given the pace of change there was not always time for adequate coordination or communication across the Agency. Observations include:

- Guidance (FAQs, OGs, knowledge articles) and information resources to assist staff to operationalise the changes were largely developed after the changes had come into effect.
- There was a significant number of new resources released and little lead time for these to be communicated across the Agency.
- There was not always awareness across the Agency of when previous guidance and FAQs had been superseded.

Solutions were developed quickly and these were not always immediately visible to all Agency staff resulting in some duplication of effort.

It was noted that implementation of the changes was built on established policy implementation processes (encompassing elements such as ensuring adequate time for internal policy development, consultation, coordinated implementation planning, and a streamlined focussed approach to implementation). Given the pace and complexity of implementation of the NDIS Supports and Funding period changes, these process components were not completed in a linear way.

The need for rapid responses to issues had some unintended consequences:

- National Contact Centre staff and those working directly with disability community stakeholders, partners and providers were often unable to answer queries with confidence. This generated more uncertainty, anxiety and

complaints, as well as additional effort developing and communicating further clarifications.

- Practice Leads were not enabled to coach staff when they did not have access to information before it was released publicly.

Agency leadership and other structures supported implementation

The readiness of Agency leadership and other structures to resolve issues quickly supported implementation. In particular, stand-up meetings¹; the Post Implementation Support Group², various multidisciplinary teams established to support different aspects of the changes (for example, design, communications), and the Practice Leadership Network were seen to have been useful for identifying issues and supporting rapid decision-making in the initial weeks of implementation.

Agency staff also reflected that strong relationships with the disability community were enabling the implementation, even at pace. However, it was anticipated that goodwill would wane if the current pace of reform continued, and that this in turn may risk the success of future elements of the reform program which will continue to be reliant on strong collaboration and co-design with the disability community.

2.8 Observation 8: Some preparation, systems and processes were not all in place by day one

Following a public consultation process run by the Department of Social Services, the NDIS Supports Lists were finalised on 2 October 2024 and came into effect one day later. Preparations for the changes had been underway for many months, though there was limited time to fully understand the detail of the lists, and particularly the specific application of different items in the lists.

There was broad agreement among the wide range of Agency stakeholders engaged during the first three months of the evaluation – from senior leaders to line managers and frontline Practice Leads – that initial implementation had been more challenging than expected. The release of the NDIS Supports Lists generated more specific queries to further interpret the lists with many specific individual requests about the supports that could and could not be funded. This included increased calls to the National Contact Centre, high attendance at participant and provider information

¹ These were weekly and sometimes daily meetings that allowed Agency teams to raise issues directly to SLT for immediate decision during the first weeks of implementation.

² Post Implementation Support (PIS) group was established by the Strategic Change Branch to provide coordination and change support over the first four weeks (extended to eight weeks).

sessions, and queries being fielded via multiple feedback channels across the Agency.

There was increasing pressure to meet demands for volumes of more detailed and highly specific information as participants, providers, partners and planners sought to apply the changes to specific cases. These included high levels of engagement and enquiry from the disability sector and providers, increased media attention and Ministerial and CEO correspondence over the first three months. The Agency's Strategic Communications Branch logged 29 correspondence requests relating to the changes in October, rising to over 200 in total by the end of December.

The efforts needed to respond to requests and the range of issues which emerged in the weeks following the introduction of the amendments may have been mitigated with longer lead times for preparation to:

- more fully understand, consult on, and prepare for the nuances of the changes from day one, including communication of the changes beyond general descriptions.
- adequately inform and prepare all frontline Agency staff on the detailed application of the changes from day one.

Quote from Agency stakeholder: "If we have one day to train 1500 people on a piece of legislation, we'll get a certain outcome. We need to build greater time into our changes to enable people to know something well."

- prepare for and conduct inclusive, high-quality, participant, provider and sector engagement on the detail of NDIS Supports List from day one.

Quote from Agency stakeholder: "We had to do our first participant information session on the changes on the afternoon of 3 October and we were still trying to understand the changes ourselves. Also because of the rushing, we didn't have plain language or accessible versions."

There were several specific aspects of implementation that the Agency was not able to complete prior to the changes coming into effect, including:

- Assessing the potential for misinterpretation or perceived conflicts between the NDIS Supports List and the Not NDIS Supports List in implementation and developing guidelines to support how they should be used together, particularly for determining communication supports and use of technology.
- Developing additional operational guidance, practice guidance, communications products and tailored resources to support interpretation of the NDIS Support List, for a range of audiences.

- Establishing clear and consistent advice to support valid applications for replacement supports.
- Establishing clear and consistent advice about the forms of evidence required and the use of evidence for decision making by planners and others.

Quote from Agency stakeholder: “We had clinicians just tearing their hair out saying “I don’t know how to do this. I’ve written a document, I’ve put it in great detail as to why this is the right solution, but you’ve just rejected it, saying it’s got an iPad in it, but that’s what the participant needs. That is their communication solution.”

A number of changes to Agency systems and processes were required to operationalise the amendments, needing coordination and refinement across the Agency. However, not all systems and processes were developed or modified by day one, adding to the challenges in implementation. Key observations include:

- The Agency prioritised participant and sector communications and information, and frontline Agency staff training and support. However, some aspects of training were paused while clarifications were being determined.
- Agency stakeholders also emphasised the need for further communication and more nuanced guidance for all parts of the system, including partners and providers.

Quote from Agency stakeholder: “Implementation does not stop with how our service delivery staff put that in a plan. Providers also have to know the consequences, know what to do, know what participants will come to them and ask about, and be able to support them”

- Systems and processes relating to replacement supports, and changes to claims and payments systems and processes, compliance and performance monitoring were not completed by day one. As a result, the Agency relied on manual processes and workarounds in some instances. Systems were continuing to evolve, and a number of Agency working groups had identified priority areas for action to be addressed in 2025.

2.9 Observation 9: There is more to understand about the impact of the changes on participant supports and plan management

Changes to participants supports

It is unclear at this stage the extent to which participants changed their support arrangements as a result of the NDIS Supports changes.

However, there were early indications that some providers and plan managers were taking a risk averse approach to the 'out' list. Where there was some uncertainty about whether a support could be funded by the NDIS these providers and plan managers were erring on the side of caution and informing participants that they could no longer utilise their NDIS funding for these supports.

Use of funding component, funding amounts, funding periods

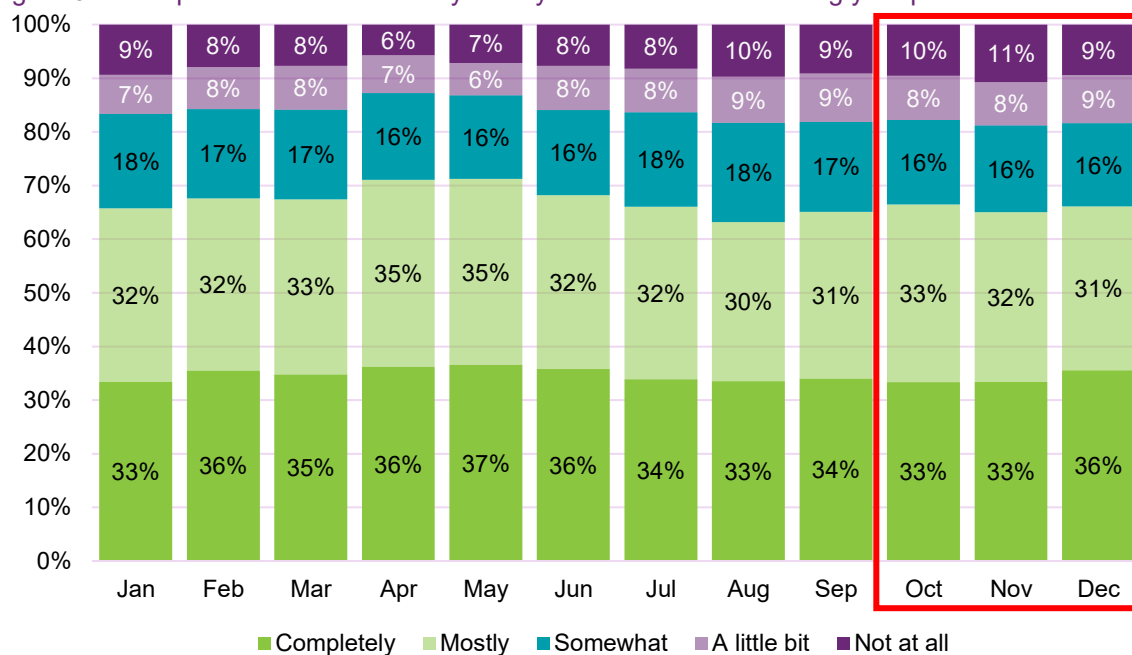
All new plans made from 9 October have a maximum 12-month duration and included a 'total funding amount'.

It is too early to examine the impacts of s33 changes on participant plans and plan utilisation. More detailed analysis of plan data and outcomes for participants will be explored in future evaluation stages.

However, monthly Participant Satisfaction survey data relating to plan utilisation reflected no significant changes since the introduction of the legislation changes:

- 65-69% of participants were 'completely' or 'mostly' confident when asked "do you feel confident in using your plan?" during October-December 2024 – a similar proportion for months prior to the changes being implemented.
- there were no discernable change in the proportion of participants who reported having little or no confidence (see Figure 9).

Figure 9: Participant Satisfaction Survey – Do you feel confident in using your plan?



Source: AHA Participant Satisfaction Survey – asks a representative sample of NDIS participants about their recent experience with the Planning / Plan Approval process. The figure above shows the monthly distribution of answers to the question: 'Do you feel confident in using your plan?' (regarding plan reassessments). More information about the PSS can be found here: [Participant Satisfaction Survey | NDIS](#).

3. Lessons and improvement opportunities

The early weeks and months of implementation highlighted enablers and barriers for change, including considerations for further implementation of these and subsequent reforms, including:

- The need for rapid responses to resolving issues highlighted the importance of having pre-prepared resources and clear communication strategies in place to implement changes efficiently.
- The pace of the changes and the rapid resolution of issues and clarifications can lead to unintended consequences including contributing to further uncertainty, anxiety, and complaints. Balancing the need for responsiveness with the need for considered planning and communication is important.
- Strong relationships with the disability community were instrumental in the initial implementation phase. Maintaining these relationships is essential for the ongoing success of the reform program.
- The pace of reform experience in the initial three months may not be sustainable in the long term, given potential impacts on staff, stakeholders, participants and the disability community and for ensuring continued collaboration and quality outcomes.

There are implications for the Agency to consider as it resolves outstanding issues associated with the legislative amendments and how it approaches the next tranche of reform. There are also opportunities to benefit from the lessons of these early months as components of the service delivery system are further developed, including further claims and payments management and debt provisions.

Early observations made to date suggest that future change implementations could be strengthened, and risks mitigated, by:

- Ensuring sufficient timeframes for developing or refining information resources and guidance for staff, and sufficient time to communicate and/or train staff
- Better communications that further contextualise the changes within the broader intent of Scheme reform and the vision for the future of the Scheme.
- A greater emphasis on participant communication and engagement before the changes come into effect – to ensure participants understand the changes before they come into effect, and to allow the Agency to address major questions, concerns and issues early.

- Involving participants and sector stakeholders in the planning process to identify potential issues and develop solutions collaboratively.

More specifically, there are opportunities for the Agency to further improve workforce support, capability, and access to information, including to:

- Empower and invest in Practice Leads to ensure greater consistency in application of the changes and better support and coach staff – for example, providing Practice Leads with resources to coach staff effectively.
- Ensure that National Contact Centre staff and those directly engaging with participants have access to information well before it is released publicly, enabling them to answer queries confidently, preventing inconsistencies, and confusion.
- Investigate barriers to more consistent use of Agency tools or other compliance resources to increase consistency and transparency of the application of the amendments and to support staff decision-making
- Further investigate which training, learning and development, and people management approaches have been most effective and can continue to support staff in more consistent interpretation of the amendments, enabling sound decision making and quality record keeping, supporting compliance and managing risks.
- More consistent utilisation of Agency systems to track internal decisions and solutions, making them visible to all staff to ensure consistency and avoid inefficiencies in duplicated or disconnected efforts.
- Improve communication channels for new guidance and information resources (FAQs, OGs, knowledge articles) to ensure all staff are aware of new resources and updates. Consider further ways to support staff to regularly engage with communicated guidance.
- Consider systems for staff to more easily access and navigate information resources, FAQs, and frequent updates, or alternative ways of communicating new resources and changes to resources.

4. Next steps for the evaluation

4.1 Areas of exploration in subsequent stages of the evaluation

The evaluation is iterative, gathering evidence and insights over time. The next stage of the evaluation will further examine implementation of the NDIS Supports and Funding period changes, and immediate impacts on the Scheme from the changes.

The first stage of the evaluation identified some specific areas of further exploration with participants, and these will be considered across subsequent stages of the evaluation. These include:

- the extent to which participants' supports have/have not changed
- changes in claims and claiming behaviour
- impacts of funding components, funding amounts and funding periods on participants' plan utilisation and spending in accordance with their plan
- participant awareness and understanding of the changes
- utilisation of replacement supports process, participant experience with the process, and impacts for participants where requests are not successful.

Further exploration of Agency capacity and implementation

The next phase of the evaluation will examine:

- continued internal monitoring of Agency data relating to enquiries, feedback and complaints
- continued consultation and analysis of workforce feedback and ongoing needs for information and practice supports via the NDIA Service Delivery Continuous Improvement Group, and Practice Leadership Network meetings
- exploration of frontline workforce understanding of the changes, enablers and challenges relating to implementation with participants through primary research (qualitative interviews and survey)
- further analysis of replacement support requests, process and outcomes, including processing times, challenges and enablers
- analysis of plan data – durations, funding amounts and categories, and spending patterns over time and identification of participants at risk of over/under-utilisation
- exploration of claims processing and outcomes from claims and payments data, including analysis for specific subgroups of participants.
- further sector engagement including consultation with DRCOs, partners and providers.

Understanding participant experience and outcomes

Later stages of the evaluation will focus more closely on participant experience, and these insights will be reported in the third summary report and final evaluation report. Evaluation activities will include:

- A survey of participants (administered at two points in time) to understand the extent of participant awareness and understanding of the changes, and self-reported changes to their supports.
- Qualitative research with participants using a range of engagement methods to explore participant experience of the changes (conducted by an independent research organisation).

Sector stakeholders have emphasised that any direct research with participants would be occurring in the context of high anxiety and uncertainty. An independent research organisation with suitable disability expertise has been engaged to undertake the qualitative research. Research will be designed in collaboration with the Evaluation Advisory Group of DRCOs which is meeting monthly to review and discuss evaluation insights.

4.2 Next evaluation report

The next evaluation summary report will be delivered in June 2025, and will focus on:

- Immediate impacts on the Scheme from the changes, including changes in claim patterns, compliance, utilisation of replacement supports, and feedback and complaints
- Emerging impacts on Scheme integrity and sustainability
- Identification of areas of risk and opportunities
- Ongoing monitoring of emerging outcomes for Scheme compliance, integrity and sustainability

This evaluation will continue through to December 2025, with further summary reports to be delivered in September and December 2025.

Appendix A: Evaluation context, aims, and methods

Evaluation context

The National Disability Insurance Scheme (NDIS) is undergoing a five-year program of reform, to strengthen participant outcomes and move towards a sustainable NDIS. The reforms commenced in 2024 with legislative amendment through the *Getting the NDIS Back on Track No 1. Bill* (the Bill).

On 22 August 2024, the Bill was passed by the Parliament, and after receiving Royal Assent, the new laws came into effect on 3 October 2023. The Bill includes a range of sections which define new rules for the NDIS. Two of these sections - section 10 (s10), NDIS Supports Lists, and section 33 (s33), Funding periods and components - are the focus of this evaluation.

An evaluation is required to understand impacts for participants of the NDIS Supports Lists and Funding period changes, and to identify learnings and opportunities to strengthen implementation and continuous improvement.

Section 10 changes

The NDIS Supports changes provide greater certainty to participants about what they can and cannot spend their NDIS funds on and seek to ensure NDIS funding is used for identified NDIS supports. Key changes were implemented through a transitional rule, and include:

- Introduction of an **NDIS Supports List**, which clearly outlines what can, and cannot, be funded as a NDIS support.
- An application process for **replacement supports** for participants who could no longer access supports which were not NDIS supports

Transitional arrangements with respect to debts incurred where NDIS funding was utilised for a non-NDIS support, which meant that providers would not incur a debt where they claimed for a non-NDIS support within 30 days of s10 coming into effect, and participants would not incur a debt within the first 12 months. The new definition of NDIS supports aims to resolve the significant level of effort currently placed on participants to understand how to spend in accordance with their plan and identify items that the NDIS would never fund.

Section 33 changes

The policy intent of the s33 changes is to support participants to spend in accordance with their plan, and to reduce plan overutilisation and inflation. This is achieved by requiring a participant's statement of supports to:

- specify a 'total funding amount' for all supports funded under the plan,
- categorise the participant's reasonable and necessary supports into one or more 'groups' of supports,
- specify a 'funding component amount' for each group of reasonable and necessary supports, and
- specify 'funding periods' during which funding will be available.

It also introduces funding periods which will enable the availability of funding for supports to be distributed over the course of a plan. This will support participants and reduce the risk of funds being exhausted early in the plan. These measures mean participants will know how much funding they have, for what supports (funding components) and how long the funds need to last.

Evaluation aims and scope

The evaluation is a formative and implementation evaluation that aims to assess the extent to which the NDIA and its systems and processes are supporting implementation, and the impact of the changes on participant experience and outcomes.

The scope of the evaluation is to:

- Understand whether the legislative changes and the transition rules are being implemented as intended (including replacement supports and transitional rules, plan budget management and transitional debt provisions).
- Enable early warning signs on areas for clarification including any unintended consequences and areas for improvement.
- Explore the needs, expectations, and experiences of participants through the implementation of the transition rules.
- Inform the progressive refinement of policy settings, guidelines, and participant communication and education (limited reporting at three monthly intervals).

Evaluation questions

KEQ 1: To what extent are the new service rules being implemented as planned?

- f) How consistently are the transition rules being applied compared to the intended process outcome (fidelity)?
- g) Are the rates of access, support inclusions, claims, rejections, and patterns of payments over time as would be anticipated by design?
- h) Are staff using the correct tools effectively to make consistent, accurate and timely decisions?
- i) Do reasons provided for approved substitutions and exemptions align with the new rules?
- j) How effectively are the compliance risk areas being identified and managed?

KEQ 2: What are the challenges and enablers to implementation?

- h) How well have communications, training and guidelines assisted in understanding changes for all groups (frontline, claims/payments staff, providers, partners, participants)?
- i) Are the resources to support implementation and compliance in place and sufficient?
- j) How have the changes affected staff, partner, and provider confidence and capability in meeting participant needs and expectations?
- k) How have the implementation of the changes impacted staff workload and productivity?
- l) What has been done in an innovative way to manage implementation challenges?
- m) Are gaps and risks being identified, addressed or mitigated in systems operations?
- n) Are the lessons from implementation experience being effectively communicated and used?

KEQ 3: What are the immediate impacts of the changes on participant experience?

- a) What is the participant experience of all aspects of the changes (NDIS supports, substitutions, exemptions, management of plan budgets and funding periods, transitional debt provisions)?
- b) How satisfied are participants with the experience of the implementation of the new rules?
- c) What do participants need to enable understanding, confidence and choice and control?
- d) Are participants, staff, and the disability community satisfied with the communication and feedback processes related to the new rules?
- e) Are emerging risks being identified and addressed in a timely manner?
- f) Are there effective strategies in place to mitigate disruptions and support participants who may be more affected?

KEQ 4: To what extent are there indicators of progress toward intended outcomes?

- a) What are the emerging impacts of the policies on participant outcomes?
- b) How have issues raised during co-design consultations been addressed?
- c) How has access, budget management, and claim behavior changed since the implementation of the new rules?
- d) To what extent are participants spending within their budgets and within the plan funding period?
- e) To what extent are the new rules improving the integrity of the scheme?
- f) To what extent are the new rules improving the sustainability of the scheme?
- g) Do participants and the disability community have increasing trust and confidence in the NDIA's implementation of the legislation?
- h) What unintended outcomes (positive and negative) were produced?

Evaluation approach and methods

The evaluation takes a formative approach involving a cyclical process that aims to improve implementation and outcomes while the implementation is ongoing. The evaluation has been designed to draw on existing NDIA data, to enable monitoring from day one, and reduce data collection burden on frontline staff and participants.

The evaluation will draw on a wide range of information and data relevant to understanding NDIS Supports and Funding period changes and their implementation. The information sources for this first report (Report 1) are listed below.

Policy and legislation documents:

- NDIS policy and legislative documents
- Relevant NDIS Supports and Funding period informational documents and webpages that are publicly available on Government websites including NDIS, DSS, and Federal register of Legislation

Agency administrative data including:

- National Call Centre data including legislation queries and complaints
- NDIS data warehouse – e.g., volume and nature of replacement requests, patterns in claiming activities, plan and budget metrics

Agency processes:

- Consultation with Agency staff across 11 branches (see Appendix B)
- Agency strategic communications legislation change reports
- Internal Agency meetings minutes – including Reform Policy Forum, Practice Leadership Network

- Internal legislation change implementation learning materials for Service Delivery and NCC, including practice guidance, knowledge articles, and eLearning modules
- Communications materials and training for Agency staff
- NDIS Operational Guidelines

Participant, provider, and public engagement:

- External communications including FAQs, media releases, direct mail, and website posts
- Summaries of participant questions and feedback via Agency public engagements (e.g. Town Halls).
- Participant feedback through existing feedback channels such as the Participant Satisfaction survey
- Summaries of provider questions and feedback via Agency engagement channels
- Agency Engagement and Inclusion (EI) Branch legislation change external engagements reports

Sector engagement:

- Weekly meetings with the Disability Advocacy Network Australia (DANA)
- Priority issues raised by sector stakeholders via the Evaluation Advisory Group).

Evaluation limitations

For the first summary report, it was not possible to include direct research with participants or providers.

To ensure **participant experience** is included, the evaluation drew on indirect and representative voices on participant experience through:

- DRCOs on the Evaluation Advisory Group,
- Issues log information provided by DANA,
- participant feedback provided directly to the Agency,
- participant questions and feedback provided in recorded town hall, engagement sessions, and
- insights from the Office of the Participant Advocate.

To ensure **provider views** were considered, the evaluation relied on existing Agency channels of engagement with providers to understand issues as they relate to the scope of the evaluation.

Appendix B: List of Agency stakeholders consulted

The Strategic Evaluation Team within the Participant Outcomes, Evidence and Evaluation Branch conducted thirteen consultations with 29 internal Agency staff involved in various parts of the s10 and s33 implementation. Consultations took place from 12 December 2024 to 20 January 2025 and were conducted by two members of the Strategic Evaluation team. Roles of staff included Deputy CEOs, Branch Managers, Directors and Assistant Directors.

Group	Division	Branch
Service Delivery	<ul style="list-style-type: none"> Operations and Support Operations, Performance and Capability State Manager QLD 	<ul style="list-style-type: none"> Scheme Reform and 3P Transition Technical Advice and Practice Improvement Frontline Capability Practice Lead
Integrity Transformation and Fraud Fusion Taskforce	<ul style="list-style-type: none"> Integrity Transformation National Contact Centre 	
Service Design and Improvement	<ul style="list-style-type: none"> Policy, Evidence and Practice Leadership Office of the Participant Advocate Strategic Change Engagement and Inclusion Strategic Communications 	<ul style="list-style-type: none"> Evidence and Practice Leadership Marketing and Communications
First Nations	<ul style="list-style-type: none"> First Nations 	
Partners, Providers and Home and Living	<ul style="list-style-type: none"> Providers Market Stewardship 	
Children's Taskforce	<ul style="list-style-type: none"> Children's Taskforce 	<ul style="list-style-type: none"> Children's Pathways Early Supports and Children's Practice