

Department of Health, Disability and Ageing
NDIS Legislation, Policy and Engagement Branch
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Attention: NDIS Legislation, Policy and Engagement Branch

Please accept this letter as Children and Young People with Disability Australia's (CYDA) submission to the Department of Health, Disability and Ageing's (the Department's) consultation on New Framework Planning and NDIS Supports. We appreciate the opportunity to provide comment on this important work.

About CYDA

CYDA is the national representative organisation for children and young people with disability, aged 0–25 years. Our vision is that children and young people with disability fully exercise their rights, realise their aspirations, and thrive in inclusive communities. Our work centres on rights-based advocacy, lived experience, and evidence-informed policy.

We acknowledge the Traditional Custodians of the Lands on which this submission has been written, and pay our respects to their Elders past and present. This is, was, and always will be Aboriginal Land.

This submission has been endorsed by the Child and Family Disability Alliance.



Background: Children and young people with disability and the NDIS

Children and young people represent a significant and growing proportion of people with disability in Australia. In 2022, around 12.1 per cent of children and young people aged 0–24 years had disability, with six per cent considered to have very high support needs.¹ Most required assistance with everyday activities, and over half

experienced multiple types of disability, reflecting the complexity of supports required for this group.

The NDIS has played an important role in the lives of children and young people. Compared with the broader disability population, participants in the Scheme are much younger. 52 per cent of all participants are aged 18 and under, and 67 per cent of new participants are aged under 15.² Eligibility rates are highest for young applicants.³

CYDA's work on NDIS rules and supports

In this submission we draw on our previous work related to NDIS rules and supports, (see Appendix for detail):

- CYDA's submission on the NDIS Amendment (Securing the NDIS for Future Generations) Bill 2026⁴
- CYDA's national survey of 1535 young people with disability, their families and caregivers on NDIS support needs in relation to Thriving Kids⁵
- CYDA's national survey of 222 children and young people with disability, their parents and caregivers about NDIS eligibility reassessments⁶
- CYDA's submission to the draft lists of NDIS Supports 2024⁷
- Good Practice Guidelines for Engaging with People with Disability.⁸

CYDA consistently hears from children and young people with disability and their families that choice, control and flexibility in how NDIS funding is used are essential to accessing supports that meet their individual needs. This is particularly important for young people aged 18–25 as they transition to adulthood, develop independence, and navigate changes in education, employment and living arrangements. For the proposed NDIS new framework planning and support rules to be effective, they must enable young people to access appropriate supports that respond to their changing needs, without unnecessary restrictions or administrative barriers.

General comment

CYDA welcomes the Department's consultation on New Framework Planning and NDIS Supports as an opportunity to share insights from the perspectives and experiences of children and young people with disability. This is CYDA's final in a series of three submissions to the current round of NDIS reform consultations.

It is CYDA's view that NDIS reforms, as brought about by the passing of the National Disability Insurance Scheme Amendment (Securing the NDIS for Future Generations) Bill 2026, are incompatible with both international and national disability policies and legislation focused on rights, protections, and inclusion. This includes Australia's obligations under the United Nations Convention on the Rights of Persons with Disabilities⁹ and Convention on the Rights of the Child,¹⁰ the final

recommendations of the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability,¹¹ and the inclusive vision of Australia's Disability Strategy 2021-31.¹²

CYDA notes that the measures being introduced infringe on the rights of children and young people with disability to "an adequate standard of living, equality and non-discrimination, health, privacy and social security", as raised by Parliament's Human Rights Committee.¹³

CYDA's recommendations provide practical steps to support implementation of reforms in ways that uphold the rights of children and young people with disability. They focus on embedding rights, inclusion, choice and control in policy and practice, with safeguards to identify and address ableism and prevent further inequity.

CYDA's Summary of Recommendations

1. Supports needs assessments and Plan reassessments

Recommendation 1.1 Ensure that the support needs assessment process is grounded in a disability and/or lived expertise evidence-base, and communicated to participants in a timely and clear manner

Recommendation 1.2 Enable replacement assessments to be initiated by participants, and leave recourse to review and appeal in support needs assessments, Plan variations, and Plan reassessments

Recommendation 1.3 Guarantee that Plan reassessments and variations will not leave participants worse off

2. NDIS support rules

Recommendation 2.1 Ensure NDIS support rules protect young people's choice and control, with flexible funding that responds to their changing needs and supports their transition to adulthood

Recommendation 2.2 Prevent the loss of essential, low-cost disability supports by conducting an evidence-based review of proposed exclusions and assessing their impacts on young people's independence, participation and safety

Recommendation 2.3 Undertake and publish a youth-specific impact assessment before implementing reforms

3. Communicating changes to young people with disability

Recommendation 3.1 Create and disseminate information early and often at key transition points

Recommendation 3.2 Communicate information in plain language and accessible formats that meet the diverse communication needs of young people with disability.

CYDA's Recommendations in detail

1. Supports needs assessments and Plan reassessments

This section responds to the discussion paper questions about support needs assessments and Plan variation and reassessment rules:

- Explanation of the support needs assessment process
- Circumstances in which a replacement assessment should be arranged
- Feedback about Plan variations and reassessments.

Recommendation 1.1 *Ensure that the support needs assessment process is grounded in a disability and/or lived expertise evidence-base, and communicated to participants in a timely and clear manner*

CYDA is generally supportive of the proposed multi-faceted approach that includes several mechanisms for assessment (including personal/environmental circumstance and targeted assessments where needed). However, CYDA recommends clarity about how assessments are made, including by what criteria and evidence base.

CYDA recommends that the design of support needs assessments, including the preparation of the personal and environmental circumstances questionnaire (PECQ), must have the genuine involvement and oversight of those with disability expertise and/or lived expertise, to safeguard against appropriate evidence being ignored or relegated. For example, in CYDA's 2025 Eligibility Reassessments survey, NDIS participants noted that relevant evidence provided by medical experts was often ignored by assessors.¹⁴

Further, support needs assessments must be delivered and communicated in a clear and timely manner. While CYDA notes an assessment report will be delivered to participants in the format of their choice, there is currently no guidance or information about the timeframe for delivery of the report nor how key terms and decisions will be clearly communicated.

Recommendation 1.2 *Enable replacement assessments to be initiated by participants, and leave recourse to review and appeal in support needs assessments, Plan variations, and Plan reassessments*

CYDA strongly supports enabling flexibility, choice and control with participants' Plans. If a participant is unhappy with a support needs assessment, CYDA recommends that they should be able to request a reassessment and, if needed, a new assessor to conduct a reassessment.

The proposed requirement that certain supports be linked to an assessed need must not disadvantage young people whose circumstances change after their initial, or previous, assessment. CYDA recommends clear guidance and timely processes for

adjusting funding when young people experience significant life transitions, without disrupting existing supports.

Relatedly, young people with disability also told CYDA in a recent focus group on NDIS reforms, that proposed functional capacity assessments must be flexibly designed to be responsive to fluctuating needs and capacity.¹⁵ For many, needs and capacity are not experienced as fixed but are rather dynamic, and can change over time depending on several factors including circumstances and developmental phases. This should be taken into consideration in all aspects of NDIS assessments and Plans.

CYDA also calls for an inbuilt mechanism for participants to request modification, review and appeal of support needs assessments, Plan variations, and Plan reassessments. Clear and transparent information and guidance is needed to ensure that review and appeal processes are genuinely accessible to participants.

Recommendation 1.3 Guarantee that Plan reassessments and variations will not leave participants worse off

CYDA is concerned that reassessments are already being made for children and young people with disability, that remove them from the NDIS when there are no alternative supports yet available.¹⁶ CYDA calls for a guarantee that no participant will be reassessed and removed from the Scheme, or face significant reductions in funding, without appropriate alternative supports in place.

Plan reassessments and variations must not leave a participant worse off, or place additional burden onto their families and informal supports. CYDA has regularly heard from parents and caregivers of children and young people with disability about the significant administrative and emotional burden of navigating the NDIS, and of filling the gaps in supports.¹⁷ Any future changes should seek to alleviate, not amplify, this burden.

Implementation of Plan variations and reassessments must also account for intersectional barriers, particularly for First Nations young people, those from multicultural backgrounds and those living in regional and remote areas, where provider choice and access to services may be limited.

2. NDIS support rules

This section responds to the discussion paper questions about NDIS support rules:

- Feedback on changes to NDIS supports for old and new framework planning
- Impacts of removing replacement supports, and unavailable items/services.

Recommendation 2.1 Ensure NDIS support rules protect young people's choice and control, with flexible funding that responds to their changing needs and supports their transition to adulthood

CYDA is generally supportive of the proposed reduction from 36 to 18 support categories, and the introduction of broader, purpose-based descriptions. However, the effectiveness of these changes must be measured by whether they improve young people's ability to access and use supports, rather than simply making the rules easier to administer.

Young people with disability aged 18–25 experience significant and often overlapping life transitions, including leaving school, entering employment or tertiary education, moving out of the family home, and developing independent living skills. These changes can substantially alter their disability-related support needs. For example, a young person moving into shared accommodation may require increased assistance with meal preparation, household tasks, and transport, previously provided by their family. If they suddenly require more funding in a particular area, but do not have flexibility across categories, there may be a risk that they are left without sufficient support to navigate these transitions.

A particularly important transition is moving from a parent/caregiver-managed NDIS plan to independently managing individuals' own supports. Young people may need additional assistance to understand their budgets, engage providers, manage provider service agreements, and make informed decisions. Access to supports, such as training to build independence, would assist with this important transition. The support rules should explicitly recognise these transitional capacity-building needs within the proposed plan management and support coordination categories. Where appropriate, young people should also be able to choose the extent of their parents or caregivers' ongoing involvement, rather than having decisions made on their behalf.

Recommendation 2.2 Prevent the loss of essential, low-cost disability supports by conducting an evidence-based review of proposed exclusions and assessing their impacts on young people's independence, participation and safety

CYDA is concerned that removing replacement supports will limit young people's ability to access affordable, practical items that meet their disability-related needs, particularly during the transition to adulthood. While the proposed support categories provide greater flexibility within defined funding groups, they do not necessarily address situations where an effective support falls outside the legislated definition of an NDIS support.

The explicit exclusion of electronic noise-cancelling headphones is a significant concern for neurodivergent young people and those with sensory processing needs. For some young people, noise-cancelling headphones are an essential sensory regulation tool, enabling them to manage overwhelming environments and participate in everyday activities. For example, headphones may enable an autistic young person to travel independently on public transport, attend TAFE/university course, remain in a busy workplace, or participate in community activities. Without

these supports, a young person may experience distress, increased behaviours of concern (which may be unsafe for self or others), and a greater reliance on support workers. Overall, this is likely to be a higher financial cost than the initial purchase of the headphones. CYDA proposes reconsidering this specific exclusion in recognition of the functional role noise-cancelling headphones can play in supporting disability-related needs.

CYDA's 2024 submission on the draft lists of NDIS Supports¹⁸ also highlighted how relatively inexpensive household items, including food preparation equipment, can reduce the need for ongoing paid assistance. For young people moving out of the family home, access to practical equipment can determine whether they can prepare meals, manage household tasks, and live independently. Similarly, smart watches can assist with executive functioning, medication reminders, and emergency alerts. Removing access to such alternatives may increase dependence on paid supports and result in higher long-term costs to the Scheme. These impacts may be compounded for young people on low incomes, particularly those moving into independent accommodation for the first time, who cannot afford to purchase these items themselves.

The review of proposed exclusions should be evidence-based, considering expert advice when these supports have been prescribed by an allied health professional including OT, physio, or behaviour practitioner.

Recommendation 2.3 Undertake and publish a youth-specific impact assessment before implementing reforms

CYDA recommends that the NDIA undertake a youth-specific impact assessment before implementing reforms, identifying which supports previously accessed through replacement arrangements will no longer be available, the consequences for young people's independence and participation, and how any resulting support gaps will be addressed.

This should be prepared in consultation with young people with disability, and should include assessing whether exclusions may increase reliance on more expensive NDIS-funded services.

3. Communicating changes to young people with disability

This section responds to the discussion paper general questions:

- Helping people with disability better understand new framework planning rules
- Accessible communication formats
- Focus of future communication products.

Recommendation 3.1 Create and disseminate information early and often at key transition points

Preceding the raft of changes triggered by the passing of the NDIS Amendment Bill 2026, our disability community have long been expressing that they are already at breaking point with changes to their NDIS supports.¹⁹ To support participants to navigate these changes, it is imperative that timely, clear, and accessible information is shared and regularly updated. CYDA recommends the creation and dissemination of information in multiple formats across platforms.

At CYDA's recent [Making Sense of the NDIS Changes Webinar](#), we discussed NDIS reforms in a clear, accessible way featuring speakers from a range of backgrounds including lived experience. The 136 attendees (a mix of young people with disability, parents/caregivers, and disability sector professionals) were asked at the start, 'how informed do you feel about the NDIS changes?'. Over 60 per cent of attendees who responded said that they feel not at all informed or slightly informed. When this question was repeated at the conclusion of the webinar, only 25 per cent responded feeling not at all informed/slightly informed, while the number of attendees feeling moderately informed/very informed about the NDIS changes had more than doubled. This example highlights the importance of sharing information in a way that is relatable, accessible, accurate, timely, and inclusive.

Information sharing is particularly important at key transition points. There is very limited national information on how young people move between NDIS pathways from early childhood to adulthood, what supports drop off during transition points, or how these changes affect families. Transitions are known to be high-risk, yet are not systematically reported.²⁰ Information about new framework planning must be targeted and practicable for NDIS participants experiencing key transitions across age cohorts. This is particularly important for young people with disability aged 18, who will transition to new framework planning in April 2027.

Recommendation 3.2 Communicate information in plain language and accessible formats that meet the diverse communication needs of young people with disability

To make informed decisions, children and young people with disability, their parents and caregivers must first understand what new framework planning is, how it works and what it means for them. While the discussion paper provides a definition, including an Easy Read version, key terms such as 'framework' and 'planning' should also be explained in youth-friendly plain language. Information about framework planning is currently difficult to navigate and understand. For example, the NDIS framework planning webpage directs readers to the Department of Health, Disability and Ageing website, where information is dense and technical. The government should provide clear, consistent, and accessible information about framework planning that young people with disability and their families can readily understand.

NDIS participants who are young people with disability must navigate a number of different systems and services. Whether this be navigating school, disability, health,

and community services, they have a right to accessible information. By following the [Good Practice Guidelines for Engaging with People with Disability](#) and the [PWDA Youth Toolkit](#), materials must be accessible to all participants. CYDA recommends that future communication products are developed to meet the needs of diverse young people with disability by taking a youth-focused lens, relevant to intersectional groups. A best practice example is CYDA's [Taking Charge of Change](#) project resources that are co-designed by children and young people with disability, their parents or caregivers. Resources are available in multiple formats, online, and in hard copy, such as blogs, case studies, podcasts, a toolkit and a picture story book. Also available in different languages, these resources have been tailored to meet the needs of intersectional groups, and specifically written for a youth audience.

Additional clarification sought: Early Childhood Intervention (ECI) supports

Although ECI supports fall outside the scope of new framework planning, which applies to participants aged 18 and over, CYDA and our colleagues at the [Association for Children with a Disability](#), who have endorsed this submission as a member of the Child and Family Disability Alliance, seek clarification from the NDIA about the future of ECI supports.

While the NDIA has confirmed that ECI will remain an NDIS support category, it is not included in the 18 proposed categories for new framework planning. We seek clarification on how ECI supports will be retained and reflected in the NDIS support rules.

We also seek clarification on the proposed change to the definition of ECI supports to include intervention delivered by “educators”. In particular, we are concerned that this could enable practitioners without appropriate qualifications or expertise in early childhood intervention to deliver these supports. CYDA recommends that the NDIA clarify the qualifications, competencies, and safeguards required to ensure ECI supports are effectively delivered for children with disability, by appropriately qualified practitioners.

Thank you again for the opportunity to make a submission. If you have any questions about CYDA's submission, please contact CYDA's Head of Policy and Research at lizhudson@cyda.org.au.

Yours sincerely



Dr Liz Hudson
Head of Policy and Research
Children and Young People with Disability Australia

Appendix: CYDA's NDIS-related submissions and reports

CYDA's work is rights-based and informed by the direct experiences and diverse voices and visions of children and young people with disability across Australia. CYDA grounds its work in evidence and a human rights approach. This submission is supported by CYDA's previous work in this area as listed below:

CYDA (2023) [Submission to the NDIS Review's Consultation into NDIS Participant Safeguarding](#)

CYDA (2023) [Submission to the Independent Review of the NDIS](#)

CYDA (2024) [Submission to the NDIS Provider and Worker Registration Taskforce](#)

CYDA (2024) [Submission to the Draft Lists of NDIS Supports](#)

CYDA (2025) [Submission to the NDIS Quality and Safeguards Commission's Consultation on the Registration of Platform Providers](#)

CYDA (2026) [Submission on the NDIS \(Integrity and Safeguarding\) Amendment Bill 2025](#)

CYDA (2026) [Submission to the Getting it Right: A New Definition for NDIS Providers Consultation](#)

CYDA (2026) [Submission to the NDIS Evidence Advisory Committee Consultation](#)

CYDA (2026) [Submission to the Inquiry into the Integrity of the NDIS](#)

CYDA (2026) [Submission to the Inquiry into the NDIS \(Securing the NDIS for Future Generations\) Amendment Bill 2026](#)

Endnotes

¹ Australian Bureau of Statistics (2026) [Children and Young People with Disability, 2022 findings](#)

² National Disability Insurance Agency (2026) [NDIS Quarterly Reports 2025-6 Q4](#)

³ Australian Institute of Health and Welfare (2024) [People with Disability in Australia](#)

⁴ CYDA (2026) submission on the [NDIS Amendment \(Securing the NDIS for Future Generations\) Bill 2026](#)

⁵ CYDA (2025) [Masking is Not Thriving Report](#)

⁶ CYDA (2025) [NDIS Eligibility Reassessments Report](#)

⁷ CYDA (2024) submission to the [Draft Lists of NDIS Supports](#)

⁸ Department of Social Services (2023) [Good Practice Guidelines for Engaging with People with Disability](#)

⁹ United Nations (2006) [Convention on the Rights of Persons with Disabilities](#)

¹⁰ United Nations (1989) [Convention on the Rights of the Child](#)

¹¹ Royal Commission into Violence, Abuse, Neglect & Exploitation of People with Disability (2023) [Final Report](#)

¹² Department of Social Services (2024) [Australia's Disability Strategy 2024 Update](#)

¹³ Parliamentary Joint Committee on Human Rights, NDIS Amendment Bill 2026, [Report 6](#); AUPJCHR 47.

¹⁴ CYDA (2025) [NDIS Eligibility Reassessments Report](#)

¹⁵ CYDA (2026) submission on the [NDIS Amendment \(Securing the NDIS for Future Generations\) Bill 2026](#)

¹⁶ CYDA (2025) [NDIS Eligibility Reassessments Report](#)

¹⁷ CYDA (2025) [Masking is Not Thriving Report](#)

¹⁸ CYDA (2024) submission to the [Draft Lists of NDIS Supports](#)

¹⁹ CYDA (2026) submission on the [NDIS Amendment \(Securing the NDIS for Future Generations\) Bill 2026](#)

²⁰ CYDA (2026) [Key Statistics Report](#)