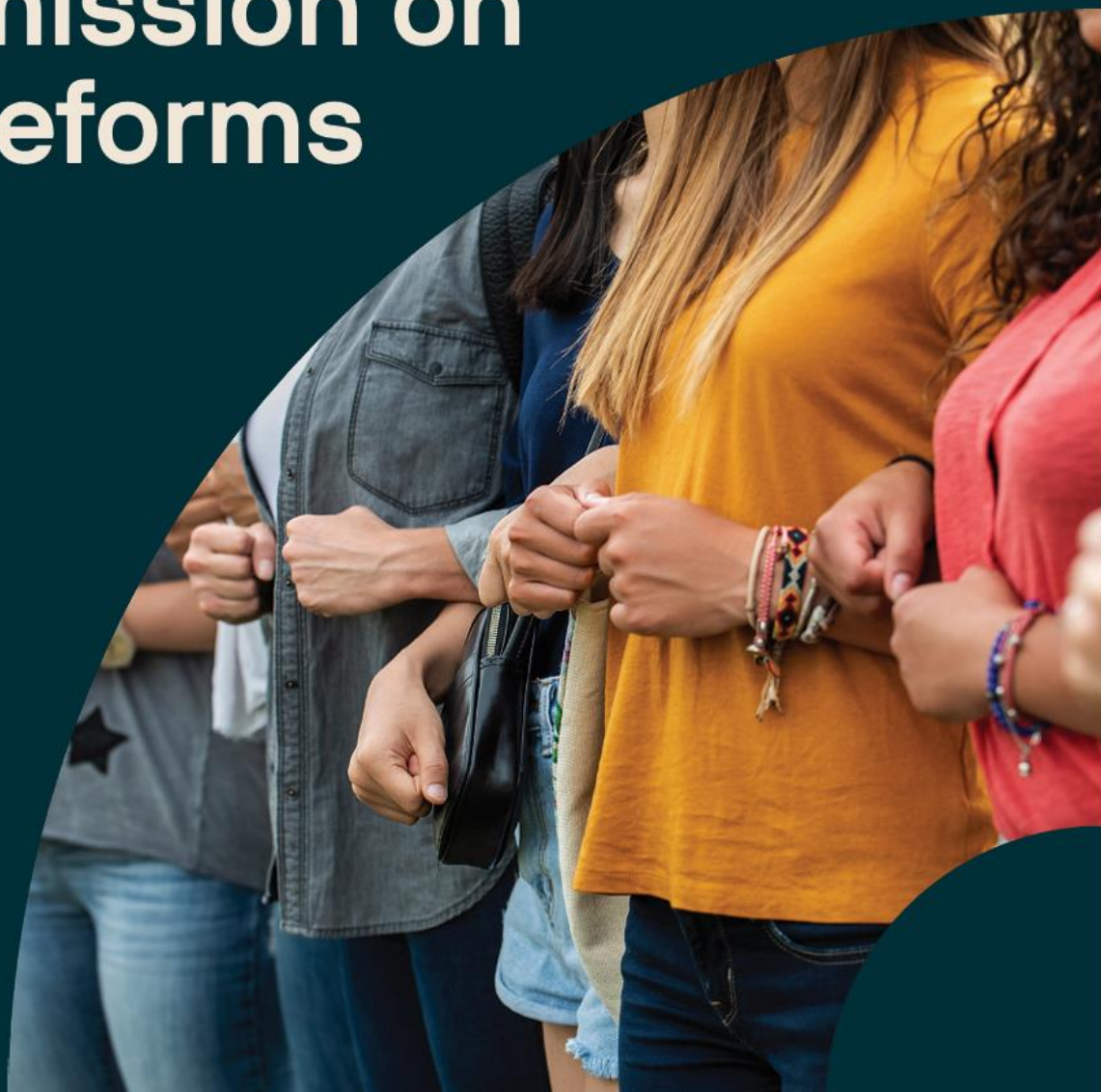
Occupational Therapy Australia

No OTs, No NDIS

Guide to making a submission on NDIS reforms



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Have your say on NDIS reforms

The Department of Health, Disability and Ageing is seeking feedback on:

- New framework planning and NDIS supports
- Changes to NDIS access
- Commissioning of Supported Independent Living (SIL)

Occupational therapists can provide practical evidence about how these proposals may affect assessment quality, access to supports, participant outcomes, safety, choice and independence.

You do not need to respond to all three consultations (but you may do so if you choose).

We recommend that you choose the consultation most relevant to your work and focus on one or two issues where you have direct experience. Your response can be short. A practical example from your work can be valuable evidence.

Key dates

Supported Independent Living Commissioning	13 September 2026
NDIS Access Changes	2 October 2026
New Framework Planning and NDIS Supports	14 October 2026

Which consultation is relevant to me?



New Framework Planning and NDIS Supports
This consultation looks at how needs are assessed and translated into plans, budgets and supports. It considers functional assessment, OT evidence, AT and home modifications, plan flexibility, reassessment and support exclusions.

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NDIS Access Changes

This consultation looks at how people are assessed to enter or remain in the NDIS. It considers functional capacity, permanence, evidence requirements, fluctuating or complex disability, and equity.



Supported Independent Living commissioning

This consultation looks at how the government could use a commissioning approach to improve quality and sustainability in supported living. It considers person-environment fit, independence, safety, choice, housing and support arrangements, and thin markets.

Each consultation has a separate closing date and submission process. The sections below can help you identify where you may want to contribute.

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New Framework Planning and NDIS Supports

Closes: 11:59pm AEDT, Wednesday 14 October 2026

Consultation page and response portal

Email: NDISConsultations@health.gov.au

In a nutshell

This consultation covers how disability support needs will be assessed, how reasonable and necessary budgets will be developed, how participants can use their plans, how plans can be changed, and proposed updates to the NDIS Supports Transitional Rule.

Supporting Documentation

- New Framework Planning - Consultation Summary (PDF)
- NDIS supports - Consultation Summary (PDF)
- Draft Participant Plan
- Draft Support Needs Assessment report

This may be relevant to you if you have experience with:

- Functional assessment and whether structured assessments capture real-world function, context, risk and variability
- The role of OT reports, professional evidence and clinical judgement in planning decisions
- Whether assessment findings translate transparently and adequately into budgets
- Plan flexibility, longer plans, plan variations or reassessments when needs change
- Assistive technology, home modifications and capacity-building supports
- The effect of support categories, exclusions or removal of replacement supports

Questions to think about

- What information about function, environment, context or risk could a structured assessment miss?
- When should an assessor seek or accept OT evidence, and how should clinical evidence be weighed?
- What information should participants receive so they can understand and, where necessary, challenge their assessment or budget?
- What changes in circumstances should trigger a quick plan variation or reassessment?

- Could changes to funding flexibility, support categories or exclusions create unintended impacts for therapy, AT, home modifications or capacity-building supports?

Your submission could explain

What you have observed in practice, why it matters for participants, and what should be retained, changed or safeguarded under the proposed approach.

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NDIS Access Changes

Closes: 11.59 pm AEDT, Friday 2 October 2026

Consultation page and response portal

Email: NDISAccessConsultation@health.gov.au

In a nutshell

This consultation is about the principles and design of a future NDIS access process. The proposed direction includes a standardised, evidence-based assessment of functional capacity, more consistent consideration of permanence and treatment, and clearer boundaries with mainstream and foundational supports. Detailed eligibility thresholds and transition arrangements are not yet the subject of this consultation.

Supporting Documentation

Public Consultation Paper Summary - NDIS Access Changes - PDF

This might be relevant to you if you have experience with

- Assessing functional capacity across different environments, tasks and times
- Standardised assessment tools and their validity for different disabilities, ages, communication needs and contexts
- The role of treating practitioners and allied health evidence in explaining functional impact and permanence
- Episodic, fluctuating, psychosocial, degenerative or complex disability
- Barriers to obtaining evidence or participating in assessment, including in rural and remote areas and for culturally diverse communities
- Transparency, review rights and accountability for access decisions

Questions to think about

- What does good functional assessment look like in your area of practice, and what could produce an inaccurate result?
- What evidence can an OT provide that a standardised tool or diagnostic report cannot?
- How should current supports, informal assistance and fluctuating function be accounted for so they do not mask underlying need?

- What should assessors understand about permanence where treatment, rehabilitation or capacity building may improve function without removing the underlying impairment?
- What would make the access process fair, accessible, culturally safe, transparent and reviewable?

Your submission could explain

What you have observed about functional assessment or access in practice, who may be at risk of an inaccurate decision, and what safeguards or evidence requirements would improve the proposed process.

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Supported Independent Living commissioning

Closes: 11.59 pm AEST, Sunday 13 September 2026

Consultation page and response portal

Email: SILconsultation@health.gov.au

In a nutshell

The Government is exploring whether it should take a more active role in planning, funding, delivering and monitoring part of the SIL market. No decision has been made. The consultation asks what good SIL looks like and how quality, safeguards, innovation, participant choice and provider sustainability could be strengthened.

Supporting Documentation

Supported Independent Living (SIL) | August 2026 Consultation Paper - PDF version

This may be relevant to you if you have experience with

- Matching housing and support arrangements to a person's functional, sensory and cognitive needs, routines and relationships
- Supporting independence, skill development, participation, privacy and ordinary home life
- Identifying and managing safety risks without unnecessarily restricting a participant's rights
- Participant choice over home, housemates, providers, workers and daily routines
- The role of independent OT assessment, AT and home modifications in service design and monitoring
- Workforce shortages, provider viability and thin markets, particularly in regional, rural and remote areas

Questions to think about

- What have you seen distinguish high-quality SIL from poor-quality SIL?
- What happens when a person's needs, home, housemates, staffing or support model are poorly matched?
- How should independent OT assessment and recommendations inform SIL design and monitoring?
- How can participant choice and control be protected if government takes a more active commissioning role?

- How could commissioning address workforce and thin-market challenges without creating provider lock-in or reducing individualised support?

Your submission could explain

What good SIL looks like in practice, what risks arise when arrangements are poorly matched, and what government should protect or change if a commissioning approach is introduced.

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Write your response

You do not need to write like a policy expert or answer every consultation question. Write in your own voice and focus on the issues you know from your professional experience.

A strong submission can be simple:

1. What have you observed?

Describe the issue and include a brief de-identified example, timeframe or other evidence where useful.

2. Why does it matter?

Explain the impact on participant safety, function, independence, choice, access, participation or outcomes.

3. What should government do?

Explain what should be retained, changed or safeguarded. You do not need to propose a detailed policy solution.

Simple template

Who I am

I am an occupational therapist working in [setting/location] with experience supporting [participant cohort].

What I am responding to

My response focuses on [consultation issue/proposal].

What I have observed

In practice, I have observed... [Include a brief de-identified example or evidence.]

Why it matters

This affects participant [safety/independence/function/choice/access/outcomes] because...

What should change

I recommend that government...

Be clear about evidence and anticipated impacts

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Tell government what you have observed, then explain how you think the proposal could improve or worsen that issue. Be clear when you are describing an anticipated impact rather than something that has already occurred.

Before you submit

Before lodging your submission, check that you have:

- Selected the correct consultation and met its closing date.
- Answer only the questions relevant to your experience; you do not need to address every question.
- Remove names and identifying details unless informed consent has been obtained.
- Separate what you observed from what you infer may happen under the proposal.
- Explain the outcome you want, not only the problem.
- Keep a copy of your response.
- Consider copying Occupational Therapy Australia at policy@otaus.com.au so member evidence can inform OTA's advocacy. OTA will not identify you or share your story publicly without permission.

More information

You can find more information via these links

- NDIS Reforms Consultation Hub
- New Framework Planning and NDIS Supports consultation
- NDIS Access Changes consultation
- Supported Independent Living commissioning consultation
- Technical Advisory Group for NDIS functional capacity