NDIS New Framework Planning and NDIS Supports Consultation

Submission to the Department of Health, Disability and Ageing

Submitted to NDISConsultation@health.gov.au

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53 PROSPECT ROAD, GAYTHORNE, QLD 4051
PO BOX 2065, BROOKSIDE CENTRE, QLD 4053
PHONE: (07) 3354 4900
EMAIL: info@amparo.org.au
WEB: www.amparo.org.au
ABN: 56 876 279 925

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1. About AMPARO Advocacy

AMPARO Advocacy is a Queensland Peak and Representative body for people from culturally and linguistically diverse backgrounds with disability, which advocates for the human rights, opportunities, voices, lived experiences and concerns of people with disabilities and their families to bring about positive and sustainable changes to legislation, policy and practice in Queensland and Australia. As a non-profit community-based organisation guided by the UN Convention on the Rights of Persons with Disabilities (CRPD), we provide independent and vigorous individual advocacy, systemic advocacy, and capacity building supports with and on behalf of the diverse people and families we serve.

Our vision is that people from a culturally and linguistically diverse background with disability are respected, valued and included in family, community and broader society, with equitable access to information, services and supports - and on their terms.

With offices in Brisbane, Logan, Ipswich and Toowoomba, AMPARO Advocacy is governed by a voluntary management committee, the majority of whom are people from a culturally and linguistically diverse background with disability. AMPARO's Inclusive Leadership Network (ILN), comprised of Queensland leaders from culturally and linguistically diverse backgrounds with disability, strengthens our ability to engage in important conversations and systemic advocacy where nothing is about, without – or led by - people with disability.

AMPARO Advocacy is funded by the Queensland State Government's Department of Families, Seniors, Disability Services and Child Safety and Australian Government Department of Health, Disability and Ageing, as well as through projects funded by the Queensland Disability Network (QDN) and Speaking Up For You (SUFY).

Note on terminology used in this submission

In this submission the term culturally and linguistically diverse (CALD) communities is used because it remains the operating term across the data, funding and policy systems this submission needs to connect with at Federal and State levels.

CALD is a majority-lens term.[1] It groups together people with vastly different histories, languages, faiths and migration pathways – from a person born overseas now working in Australia as a skilled migrant to a family who arrived as refugees a generation ago – as though they were one population with one set of needs. Many people who fall within this definition do not use the term "CALD" to describe themselves or their own communities, and some find it alienating. Researchers and practitioners are increasingly calling for the term to be retired altogether.[2]

AMPARO Advocacy uses the CALD acronym within this document as a practical bridge to existing policy and data settings. In practice, engagement should always follow the language a person or community uses for themselves, their culture and their identity – CALD is a category for planning and reporting, not a label to apply to people in the room. AMPARO Advocacy expects to revisit this terminology, in conversation with the communities it serves as a Peak and Representative body in Queensland.

[1] Sawrikar & Katz, 2009.
[2] Pourmarzi et al., 2025.

2. AMPARO Advocacy's Recommendations

Recommendation 1: That the core needs assessment tool (the modified I-CAN v6) and the Personal and Environmental Circumstances Questionnaire (PECQ) are validated for use with CALD participants, including with an interpreter present, and that assessor accreditation training covers working through accredited interpreters and understanding the distinct role of bicultural workers in supporting participant engagement. Interpreters engaged in assessment and planning processes should have access to disability and NDIS-specific training and resources to support accurate communication of disability-related concepts.

Recommendation 2: That inadequate language access or cultural or linguistic misunderstanding during a support needs assessment is included as an explicit example of a circumstance warranting a replacement assessment.

Recommendation 3: That clear cultural competency and cultural safety requirements must be set out for accredited NDIA assessors, alongside the clinical and technical requirements already proposed.

Recommendation 4: Participants from CALD backgrounds should be able to see what assumptions have been made about family and community support arrangements and have an opportunity to correct those assumptions. Therefore, AMPARO Advocacy recommends that the budget method rules require decision-makers to document how informal supports have been assessed and how any informal support offset has been applied.

Recommendation 5: AMPARO Advocacy recommends participants receive a plain-language budget explanation that sets out:

- the support categories funded;
- any adjustments applied;
- any offsets applied;
- how informal supports were considered; and
- how assessment findings translated into funding decisions.

Recommendation 6: That interpreting and translation support (category 10 in the New Framework Planning paper) are treated as protected or guaranteed funding rather than funding that competes against every other flexible support a participant chooses to buy. This is in line with the Australian Government's obligations under Article 4(1)(h) (General Obligations), Article 9(1)(b) and Article 9(2)(a), (f) and (h) (Accessibility), and Article 21 (Freedom of expression and opinion, and access to information) of the UN Convention on the Rights of Persons with Disabilities.

Recommendation 7: Produce translated, Easy Read and in-language versions of the actual support needs assessment report and participant plan templates, not only consultation and communication materials. Ensure participants have access to appropriately qualified and

accredited interpreters throughout assessment, planning, implementation and review processes. Recognise bicultural workers as a complementary support that can assist participants to understand planning decisions, navigate systems and engage confidently in plan implementation meetings, but not as a substitute for professional interpreters. This is in line with the Australian Government's obligations under Article 4(1)(h) (General Obligations), Article 9(1)(b) and Article 9(2)(a), (f) and (h) (Accessibility), and Article 21 (Freedom of expression and opinion, and access to information) of the UN Convention on the Rights of Persons with Disabilities.

Recommendation 8: That NDIA testing of budget method settings (the current mock support needs assessments) includes CALD participants, and that testing findings are disaggregated by cultural and linguistic background, and that disaggregated testing findings are publicly available.

Recommendation 9: Language, referral-pathway and provider-availability barriers can together or separately slow a CALD participant's access to timely medical or allied health evidence. To recognise this, AMPARO Advocacy recommends that flexibility is built into evidence requirements for targeted assessments and plan variations for people from CALD backgrounds with disability.

Recommendation 10: That this consultation, and future new framework planning communication products, are being made available in community languages and through bicultural-worker-facilitated engagement, and not solely through written, English-language channels.

Recommendation 11: That the NDIA's existing arrangements for funding spoken-language interpreting outside participant plans will continue under new framework planning and clarify the intended scope of the Interpreting and translation supports category, including its revised description in the NDIS Supports Transitional Rules. This is in line with the Australian Government's obligations under Article 4(1)(h) (General Obligations), Article 9(1)(b) and Article 9(2)(a), (f) and (h) (Accessibility), and Article 21 (Freedom of expression and opinion, and access to information) of the UN Convention on the Rights of Persons with Disabilities.

Recommendation 12: That a significant reduction in informal support (for example, carer illness or burnout, or a family member relocating) is an explicit or stated trigger for a plan variation or reassessment, given that plans may now run for up to five years and informal support is used to offset in-home and community supports funding.

Recommendation 13: That transitional arrangements are put in place so that participants on old framework plans with replacement support requests pending or in progress are not left without a pathway when replacement supports are removed, for guidance to be provided on how a participant's language and cultural context is considered when assessing need for smart devices and communication apps as stated supports.

Recommendation 14: That a single and consistent set of support category names and numbers is settled upon and expressly used or integrated across the final rules, the participant plan and support needs assessment report templates, and all participant-facing and translated materials.

3. Executive Summary

AMPARO Advocacy welcomes the opportunity to respond to the New Framework Planning Consultation on the support needs assessment, budget method, plan variation and reassessment, and NDIS supports rules for new framework planning, together with the NDIS Supports Consultation-paper on proposed changes to the NDIS Supports Transitional Rules.

This submission focuses on the specific opportunities and risks these reforms present for participants from culturally and linguistically diverse (CALD) and refugee backgrounds. Many of the issues raised reflect concerns AMPARO has previously identified regarding language access, cultural responsiveness, equitable participation and the visibility of CALD experiences within NDIS systems. We welcome the opportunity to consider these issues at the rule-design stage, when accessibility, equity and transparency can be embedded into the framework rather than addressed retrospectively through policy or operational workarounds.

AMPARO supports the overall objective of new framework planning to create a more consistent, transparent and person-centred approach to assessing support needs, developing budgets and building plans. However, **the success of these reforms for CALD participants will depend on whether language access and cultural responsiveness are treated as core components of the framework rather than implementation considerations**. In particular, AMPARO is concerned that the consultation materials provide limited information about how interpreters will be used, how language and cultural factors will be considered during assessment, how communication barriers will be distinguished from disability-related support needs, and how participants with limited English proficiency will be supported to understand and challenge decisions that affect them.

Across the consultation papers, AMPARO identifies five key priorities:

- ensuring language access, interpreting arrangements and cultural responsiveness are embedded throughout the support needs assessment process;
- improving transparency about how assessment findings translate into support categories, funding decisions and budget outcomes;
- ensuring communication and interpreting needs are consistently recognised, assessed and funded;
- protecting participants from disadvantage where informal support arrangements change or where communication barriers affect planning outcomes; and
- strengthening consultation, information-sharing and implementation activities so CALD participants can meaningfully engage with reform processes and understand changes that affect them.

The five priorities above speak to Australia's obligations under the UN Convention on the Rights of Persons with Disabilities, notably under Article 4(1)(h) (General Obligations), Article 9(1)(b) and Article 9(2)(a), (f) and (h) (Accessibility), and Article 21 (Freedom of expression and opinion, and access to information).

Several rights engaged by these reforms - particularly access to information and communication, equal participation in decision-making and community inclusion, depend directly on how these rules are designed and implemented. AMPARO's recommendations are intended to strengthen the accessibility, fairness and effectiveness of new framework planning so that participants from CALD backgrounds are able to benefit from the reforms on an equal basis with other NDIS participants, and that the Australian Government meets its responsibilities under the UN Convention on the Rights of Persons with Disabilities as a ratifying party.

4. Responses to Consultation Questions - New Framework Planning

Support needs assessment rules

1. What parts of the support needs assessment process need more explanation?

AMPARO Advocacy supports the intent of a more structured and consistent support needs assessment. However, the consultation paper's description of the four-part assessment process, comprising the core needs assessment, the Personal and Environmental Circumstances Questionnaire (PECQ), targeted assessments, and the translation of assessment findings into categories of NDIS supports, does not address language access, interpreting, translation or cultural responsiveness requirements.

For participants from culturally and linguistically diverse (CALD) backgrounds, the validity and accuracy of an assessment is heavily dependent on effective communication. Yet the consultation materials do not explain:

- when and how accredited interpreters will be provided;
- whether participants will be able to nominate their preferred language and interpreter;
- whether translated or in-language versions of the PECQ will be available;
- how assessment information will be validated when gathered through an interpreter;
- what cultural competency requirements will apply to NDIA assessors; or
- how assessors will distinguish disability-related support needs from barriers arising from language, migration experiences, trauma, cultural expectations, or unfamiliarity with Australian service systems.

The core needs assessment is described as being based on a modified version of the I-CAN v6 assessment tool. AMPARO Advocacy would welcome further information about whether this modified tool, and the guided-conversation assessment model more broadly, has been tested and validated with CALD participants, including participants who require interpreters. We would also like clarification about whether assessor accreditation includes training in working effectively through interpreters and with participants from diverse cultural and linguistic backgrounds.

We note that the consultation paper describes the support needs assessment as using a 'structured, reliable and independently validated methodology'. AMPARO Advocacy asks the Department to publish whether that validation included participants from CALD backgrounds and interpreter-mediated assessments, and if not, how this will be addressed before transition begins in April 2027.

Without these safeguards, there is a risk that participants from CALD communities may be disadvantaged by assessments that do not accurately identify disability-related support needs, resulting in planning and funding decisions that do not reflect their actual circumstances.

2. ***What questions and feedback do you have about the draft template support needs assessment report?***

AMPARO Advocacy considers the support needs assessment report an important transparency and accountability mechanism because it forms the basis for future funding decisions.

From a CALD perspective, we recommend the report include:

- a clear record of whether an interpreter was used and in what language;
- a mechanism for participants to identify factual inaccuracies or misunderstandings before the report is finalised;
- a dedicated section recording participant comments, including any disagreements with assessment findings;
- a clear distinction between participant-reported information, assessor observations and assessment conclusions;
- information about how cultural, linguistic and communication factors were considered during the assessment; and
- a plain-language summary of key findings and how those findings will be used in future planning and budget decisions.

AMPARO also recommends that participants be able to receive the report in translated formats and accessible formats, including Easy Read where required. Providing participants with information in a language and format they can understand is critical to ensuring meaningful participation in the planning process.

We note the consultation paper's commitments that participants 'will receive a copy of their report in their preferred format', and that the assessor will go over the information with the participant at the end of the discussion to make sure it is correct. AMPARO Advocacy welcomes both. We recommend the rules make clear that 'preferred format' includes a participant's preferred language, and that the end-of-assessment check is done with the interpreter present, so errors are picked up before the report is finalised rather than through a later replacement assessment.

3. ***In what circumstances do you think a replacement assessment should be arranged? Are there additional circumstances that should be considered?***

AMPARO Advocacy strongly supports the availability of replacement assessments where there are concerns about the integrity or accuracy of the assessment process. The consultation paper notes that a replacement assessment may be considered where concerns arise about the assessment or report but provides limited detail about the specific circumstances that should trigger this process.

In AMPARO Advocacy's view, inadequate language access or cultural and linguistic misunderstanding during the assessment should be explicitly identified as grounds for a replacement assessment. This could include situations where:

- an interpreter was not provided when required;

- the participant was unaware of their right to request an interpreter or other communication support;
- the participant was unable to communicate effectively in English;
- interpretation quality was inadequate;
- important information was misunderstood or omitted because of language barriers;
- cultural factors were not appropriately understood or considered during the assessment; or
- the participant was unable to meaningfully participate in the assessment because communication supports were not provided.

Naming these circumstances directly in the rules would provide greater confidence to CALD participants and reduce the burden on individuals to argue, after the fact, that communication barriers affected the assessment outcome.

More broadly, participants should have access to a replacement assessment where there is evidence that communication barriers, accessibility barriers, factual inaccuracies or procedural issues may have affected the reliability of the assessment findings.

Given that the support needs assessment will form the basis of future budget decisions, strong language access protections are essential to ensuring equitable outcomes for all participants.

Budget method rules

1. What information would help participants understand how a budget is calculated?

AMPARO Advocacy welcomes the intention of a more transparent and consistent budget method. However, from a CALD perspective, participants will only be able to understand how their budget has been calculated if the assumptions and adjustments applied within the budget method are clearly visible and explained in plain language. The consultation paper describes a funding methodology based on 18 support categories, multiple funding mechanisms, and a range of adjustments and offsets, but it is currently unclear how participants will be able to identify which of these factors have affected their individual budget.

AMPARO is particularly concerned about the proposed informal supports offset applied within the In-Home and Community Supports category. The policy overview indicates that funding may be adjusted according to the frequency and durability of informal supports. For many CALD communities, family and community caregiving carries strong cultural obligations and may be offered, assumed, or reported even where it is not sustainable, or where it masks significant unpaid carer burden. AMPARO's experience suggests a similar risk may arise for participants from many CALD communities, where strong family and community obligations can obscure whether informal support arrangements are genuinely sustainable.

AMPARO recommends the budget method rules require assessors to apply culturally informed guidance when considering informal supports, including distinguishing between genuine, sustainable support capacity and support that is provided primarily because of cultural expectation, lack of alternatives, or barriers to accessing formal services. Assessors should receive training to explore these issues sensitively and consistently.

AMPARO is concerned that interpreting and translation supports are proposed to be funded through the flexible budget. Participants who require interpreters to communicate effectively may be forced to choose between funding interpretation and other disability supports. This creates a risk that participants from CALD backgrounds will experience reduced access to information, planning processes and service engagement.

Unlike many other supports funded through flexible budgets, interpreter access is an enabling support that determines a participant's ability to understand, access and use all other funded supports. Without effective communication support, participants may be unable to fully engage in planning discussions, understand plan decisions, navigate service options or exercise genuine choice and control over their NDIS funding.

AMPARO recommends that the Department clarify how interpreting and translation supports will be funded and whether additional safeguards are required to ensure participants are not disadvantaged because they need language support to access the Scheme. This is particularly critical to ensure the Australian Government meets its obligations under the UN Convention on the Rights of Persons with Disabilities, notably under Article 4(1)(h) (General Obligations), Article 9(1)(b) and Article 9(2)(a), (f) and (h) (Accessibility), and Article 21 (Freedom of expression and opinion, and access to information).

Our above concern is heightened by how funding for this category is proposed to be calculated. AMPARO notes that the consultation materials appear to describe different approaches to determining funding for interpreting and translation supports. The policy overview indicates that interpreting and translation supports are assessed through the Core Needs Assessment and Personal and Environmental Circumstances Questionnaire (PECQ), with funding based on pricing multiplied by hours of need. In contrast, the budget fact sheet describes interpreting and translating as a category where assessment outcomes are used to develop relative levels of need that are then mapped to funding amounts.

These documents appear to describe different funding approaches. Additional clarification is urgently needed so participants can understand what information will determine their funding allocation, how language support needs will be assessed, and how funding amounts will ultimately be calculated. Without this transparency, participants may find it difficult to understand, anticipate or challenge budget decisions relating to interpreting and translation supports.

Either way, the amount of funding available depends on the assessment accurately identifying a participant's language support needs. It is not currently clear how interpreter requirements will be identified, recorded or weighted within the 12 Core Needs Assessment domains or the PECQ. AMPARO asks the Department to please explain how language support needs will be recognised within the assessment process and translated into funding outcomes. Again, this request is made pursuant to Government obligations under Article 4(1)(h) (General Obligations), Article 9(1)(b) and Article 9(2)(a), (f) and (h) (Accessibility), and Article 21 (Freedom of expression and opinion, and access to information) of the UN Convention on the Rights of Persons with Disabilities.

AMPARO understands that NDIA participants currently have access to spoken-language interpreting arrangements outside participant plans. The Department should clarify whether these arrangements will continue under new framework planning and how they will interact with the proposed Interpreting and Translation Supports category. If spoken-language interpreting were to move into participants' flexible budgets, it would create a significant new cost pressure on the plans of CALD participants and could be viewed as unreasonable, disproportionate and discriminatory.

Finally, the consultation materials indicate that budget method settings are still being tested through participant assessment and budget modelling activities. AMPARO asks the Department to please clarify whether CALD participants are included in this testing cohort and whether outcomes will be analysed by cultural and linguistic background. Given the longstanding absence of robust CALD participant data within the NDIS, it is important that potential inequities are identified and addressed before the budget method is finalised rather than after implementation.

2. ***What questions and feedback do you have about the draft participant plan template?***

AMPARO Advocacy is concerned that the new planning framework introduces a significant and overwhelming amount of new conceptual information for participants to understand, including the distinction between flexible and stated supports, 18 support categories, multiple funding methodologies, funding adjustments and offsets, and separate processes for variations and reassessments.

For participants with limited English proficiency, or limited literacy in either English or their first language, understanding how their plan has been constructed will become increasingly difficult. AMPARO therefore strongly recommends that participant plans include:

- a plain-language explanation of how the budget was calculated;
- a clear description of any offsets, adjustments or assumptions applied;
- an explanation of how informal supports were considered;
- a summary of the participant's assessed support needs and how these translated into funding outcomes;
- a clear distinction between flexible and stated funds; and
- information about review and appeal rights.

AMPARO also recommends that participant-facing documents, including support needs assessment reports and participant plans, be routinely available in translated and Easy Read formats at no cost to the participant. Translation should not be limited to consultation materials. Participants should be able to receive the documents that directly affect their rights and supports in a format and language they can understand. Again, this is consistent with the Government's obligations under Article 4(1)(h) (General Obligations), Article 9(1)(b) and Article 9(2)(a), (f) and (h) (Accessibility), and Article 21 (Freedom of expression and opinion, and access to information) of the UN Convention on the Rights of Persons with Disabilities.

In addition, AMPARO supports greater involvement of bicultural workers and community-based supports in plan implementation discussions. Professional interpreters and bicultural workers perform distinct but complementary roles. Qualified interpreters are essential to ensure accurate, independent and confidential communication throughout assessment, planning, implementation and review processes. Wherever possible, interpreters should hold recognised certification or accreditation appropriate to the language and context.

While interpreter provision is essential, effective participation often requires more than direct translation. Bicultural workers can assist participants to navigate unfamiliar disability concepts, understand planning decisions, engage with providers, and build confidence to exercise choice and control. Their role is to complement, rather than replace, professional interpreter services and help ensure that participants can engage with the Scheme in culturally responsive and meaningful ways.

Plan variation and reassessment rules

AMPARO Advocacy supports moving more day-to-day plan changes to the lighter-touch variation pathway, provided this does not come at the cost of timely access for participants who face practical barriers to supplying evidence quickly. Targeted assessments and plan variations both rely on reports or quotes from medical and allied health professionals. CALD communities (particularly newer arrivals, regional and remote CALD populations, and participants without an established relationship with a GP or allied health provider) often face higher practical barriers to obtaining this evidence quickly, including cost, provider availability,

and language barriers at the referral stage itself. This is a fairness and timeliness issue distinct from the assessment process and is particularly acute for variations sought for urgent or crisis reasons. AMPARO Advocacy strongly recommends the rules build in reasonable flexibility to evidence requirements, and clear guidance for NDIA staff, where these barriers are affecting a participant's ability to respond within expected timeframes.

AMPARO also recommends the Department provide clear guidance about what evidence will be accepted for plan variations, including circumstances where participants may face barriers obtaining specialist reports or quotes within required timeframes. This is particularly important for participants living in regional and remote areas, participants from refugee and migrant backgrounds, and participants who require interpreting support to navigate health and disability systems. The consultation materials indicate that plan variations will generally rely on evidence such as updated quotes and reports but provide limited detail about how evidentiary requirements will be applied in practice.

AMPARO also asks the Department to please consider how changes in informal support will be handled under longer plans. Informal support is recorded through the PECQ and used to offset in-home and community supports funding, and plans may now run for up to five years. The plan variations fact sheet lists crisis situations, health and safety risks, new information and targeted funding changes as reasons for a variation but does not identify changes in informal support arrangements. Because informal support arrangements are proposed to influence funding through offsets applied to in-home and community supports, changes to those arrangements can have a direct impact on whether a participant's plan continues to reflect their actual support needs.

For many CALD families, informal care arrangements can change quickly. For example, through carer illness or burnout, a family member returning overseas, changes in migration status, or changes in who lives in the household. **AMPARO recommends that NDIA guidance explicitly recognise significant changes in family or household circumstances, including the loss of key informal supports due to migration, relocation, illness, caring responsibilities or family breakdown, as circumstances that may warrant a plan variation or reassessment.** This would ensure an offset applied at the start of a plan does not keep reducing funding after that support is no longer available.

NDIS supports rules

AMPARO Advocacy welcomes the clarification that NDIS supports can be purchased from retail, hardware and pharmacy stores rather than only from specialist disability providers. This is a practical and timely benefit for participants in areas with limited disability-specialist provider coverage, including some newly arrived and regional CALD communities. The consultation materials state that participants will be able to purchase NDIS supports from a broader range of mainstream retailers, which may improve accessibility and reduce practical barriers to obtaining supports.

AMPARO Advocacy's feedback on the removal of replacement supports and the proposed Interpreting and Translation Supports category is provided below.

AMPARO Advocacy also notes that commonly requested replacement items, including smart devices and communication applications, are proposed to be incorporated into the new support framework rather than accessed through replacement support arrangements. This change may be difficult for participants to understand, particularly where participants have previously sought these items through replacement support processes. The Department should clearly explain these changes through translated, Easy Read and community-facing

materials, including practical examples of how participants can access these supports under the new framework.

General Questions

AMPARO Advocacy has previously raised concerns with the NDIA about the accessibility of consultation processes for CALD communities. While we recognise efforts to provide information in alternative formats, it is not clear from the consultation materials how participants can access community-language resources or participate in consultation activities using a language other than English. Greater visibility of these options would support more inclusive participation by CALD communities.

Meaningful consultation requires that people can both access information and provide feedback in ways that are linguistically and culturally appropriate. Without clear information about available language supports, there is a risk that the views of CALD participants, families and communities will be under-represented in the development of the new framework planning rules.

AMPARO also notes that the consultation paper lists the ways to provide feedback as a written submission, online questions, a video response (including in Auslan), email or a phone call. The consultation materials do not explicitly identify options such as providing feedback in a language other than English, accessing interpreting support, or participating in community-language engagement activities. AMPARO recommends that future new framework planning consultations and communication products clearly explain all available accessibility supports and participation pathways, including interpreting services, translated resources and opportunities for in-language engagement through trusted multicultural and community organisations.

5. NDIS Supports

1. Are the proposed support categories clear?

AMPARO Advocacy supports reducing the number of support categories from 36 to 18 and moving to purpose-based descriptions. Broader, plain-language categories should be easier to explain in translated and Easy Read materials, which is particularly important for participants from CALD backgrounds. The proposal to move from 36 categories to 18 broader categories responds to concerns raised in previous consultation that the current Rules are complex and difficult to navigate for *all* participants.

Of further concern, the supports categories are not yet presented consistently across the consultation materials. The NDIS Supports Consultation-paper lists 18 categories, but the mapping at Attachment 1 numbers categories up to 20 and includes an early childhood category and a short-term respite category that do not appear in that list. Category numbers also differ between consultation documents. For example, Interpreting and Translation Supports is category 10 in the new framework planning materials and category 12 in the mapping table in Attachment 1. Category names also vary, including references to "Therapy supports", "Therapy support" and "Therapy".

Consistency in category names and numbering is particularly important for clarity and accessibility. Participants, family members, advocates, interpreters and bilingual workers often rely on translated and simplified materials to understand NDIS processes. Where different names or numbers are used across documents, it will be difficult to determine whether materials are referring to the same support category. AMPARO recommends that the Department adopt a single set of category names and numbers and use these consistently across the final Rules, participant plans, support needs assessment reports and all participant-facing and translated materials.

2. Are there areas where further explanation, examples or guidance would be helpful?

AMPARO Advocacy welcomes the inclusion of examples within each support category. We suggest further explanation and examples would be helpful in three areas.

Culturally relevant examples

The In-home and Community Supports category explicitly refers to participation in "community, cultural, civic, social and recreational activities". AMPARO welcomes this inclusion and recommends that guidance materials include examples that reflect the diversity of participants' lives and communities. Examples relevant to participants from CALD backgrounds may include support to participate in cultural and faith-based events, language-group activities and community celebrations. Examples such as these help participants, families and support workers understand that support for community participation is not limited to mainstream recreational activities.

Decision-making support

The In-home and Community Supports category also includes "assistance with decision making". AMPARO notes that decision-making may occur in different ways across cultures and communities. In many CALD families, participants may seek advice from family members, elders or trusted community members when making important decisions. Guidance should explain how decision-making supports can recognise these relationships and cultural practices while maintaining the participant's rights, preferences and autonomy.

The Attachment 1 mapping

The Attachment 1 mapping is the primary tool provided to help participants understand how current support categories align with the proposed support categories, and participants are specifically encouraged to review it. However, in its current form it is a detailed, legalistic table that many participants, families and support workers may find difficult to navigate, particularly when using translated materials. AMPARO recommends the development of a plain-language version, including translated and Easy Read formats, organised around the questions participants are most likely to ask. For example: "I currently receive support for X. Where will it sit under the new categories?" Such a resource would help participants understand the practical impact of the proposed changes and support a smoother transition to the new framework.

3. Are there particular support types where more guidance may be needed?

AMPARO Advocacy considers two support types would benefit from additional guidance.

Interpreting and translation supports

The current Rules describe this support as interpreting and translation needed "as a result of their disability". The proposed description removes that qualifier and instead refers to independent communication in "personal, social, cultural, civic or community activities where translation and interpretation is needed".

AMPARO asks the Department to clarify:

- whether this change is intended to broaden the category to include spoken community-language interpreting, or whether it remains limited to disability-related communication needs such as Auslan;
- how the category relates to any existing NDIA arrangements for funding language interpreting outside participant plans; and
- how need for this support will be identified through the support needs assessment process, given funding for the category is proposed to be linked to assessed need.

Without clear guidance, participants, providers and NDIA staff will apply different interpretations to this category, generating inconsistency and tremendous confusion among all stakeholders. Further still, participants with limited English proficiency will likely face particular challenge understanding eligibility requirements or effectively or fairly challenging inconsistent decisions.

Smart devices and communication applications

The consultation paper proposes that commonly requested replacement supports, including tablets, smart phones, smart watches and communication applications, may instead be included in participant plans where they meet the relevant requirements. However, those requirements are not explained in the consultation materials.

AMPARO Advocacy recommends that guidance be issued that clearly explains the eligibility requirements, assessment pathway and evidence requirements for these supports. As a matter of fairness and proper process, participants should be able to understand (1) what information will be considered, (2) what evidence may be required and (3) how decisions will be made.

The consultation materials also indicate that communication-related assistive technology forms part of the proposed assessment framework. However, it is not clear how eligibility for smart devices and communication applications will be assessed in practice.

As noted earlier in this submission, AMPARO Advocacy anticipates that CALD participants will likely face additional barriers obtaining assessment evidence, including limited access to allied health professionals who can assess communication needs in a participant's first language. Departmental guidance should also clarify how language and cultural factors will be considered when assessing communication-related supports, particularly where a communication application or device needs to function in a participant's preferred language to be effective.

4. Are there any practical issues, or unintended impacts that need to be considered?

AMPARO Advocacy has three practical and rights-based concerns about the removal of replacement supports.

Requests already in the system. The consultation paper reports that, as at 17 July 2026, 2,072 replacement support requests were pending. AMPARO asks that the rules please include transitional arrangements so that requests lodged before the change takes effect are decided under the current process, and participants are not required to start again. **This is particularly important where participants have already invested time and resources obtaining supporting evidence, assessments or reports to support their application.** Without transitional arrangements being in place, bottlenecks and inefficiencies in the Department's decision-making system will be quickly generated, impacting the Department's resources and timeliness in which all participants access the services and supports they are entitled to.

Participants remaining on old framework plans. Most participants will stay on old framework plans for some time, with transition not expected to be complete until December 2030. The consultation paper indicates that smart devices and communication apps will be available as stated supports where they have been determined reasonable and necessary for a participant under old framework planning. However, we note the paper but does not explain how a participant on an old framework plan would seek that determination once the replacement supports process is removed. AMPARO Advocacy thus asks the Department to please set out a clear, accessible pathway for these participants, so the removal of replacement supports does not create uncertainty or a practical access gap for participants who remain on old framework plans during the transition period. The paper also reports that

1,439 requests (around 13%) were invalid applications. While the reasons are not given, this suggests the current process has been difficult for many participants to navigate. Any replacement pathway should be designed so that participants, including those with limited English proficiency, can use it without the same difficulty.

Communicating the change. Participants with limited English proficiency and/or from marginalised communities are less likely to hear about changes through standard written channels (such as this consultation process) and may continue to seek replacement supports after the process has closed. AMPARO recommends the change be communicated in community languages and through advocacy and community organisations, with enough notice before it takes effect. **Communication should include clear examples of what has changed, what participants need to do instead, and where they can seek assistance if they have questions about previously available replacement supports.** This recommendation is consistent with the Government's obligations under Article 4(1)(h) (General Obligations), Article 9(1)(b) and Article 9(2)(a), (f) and (h) (Accessibility), and Article 21 (Freedom of expression and opinion, and access to information) of the UN Convention on the Rights of Persons with Disabilities.

6. Closing

AMPARO Advocacy supports efforts to make the NDIS more transparent, consistent and easier for participants to navigate. However, reforms can only achieve these goals if they are equally accessible to all participants and inherently rights-based and consistent with the Objects of the *National Disability Insurance Scheme Act 2013* (Cth), notably Section 3(1)(a) that gives effect to Australia's obligations under the UN Convention the Rights of Persons with Disabilities. For people from culturally and linguistically diverse backgrounds, equitable participation requires more than translated documents. It requires assessment processes, funding approaches, communication strategies and consultation practices that recognise and respond to the realities of language, culture and migration. Here, we again highlight that around 25% of Australians with disability were born overseas, including 15% in a country where English is not the main language (Australian Institute of Health and Welfare, 2026), yet people from CALD backgrounds make up only around 8.7% of NDIS participants nationally (NDIS Reforms Impact Analysis, May 2026).

We encourage the Department to continue working with CALD communities and specialist multicultural organisations throughout the development, testing and implementation of new framework planning. AMPARO Advocacy welcomes further opportunities to contribute our expertise and the voice and experiences of the communities we support to help ensure these reforms deliver fair and inclusive outcomes for all participants.

Please contact AMPARO Advocacy on (07) 3354 4900 or info@amparo.org.au if you would like to discuss this submission further or explore opportunities for ongoing engagement with CALD communities as the reforms progress.

Kind Regards

Ange Boyd
Senior Systemic Advocate
AMPARO Advocacy
0493 342 559
ange@amparo.org.au

Dr Claire Brolan
Chief Executive Officer
AMPARO Advocacy
0494 655 031
claire@amparo.org.au