

The NDIS Rules (Support lists) Review

July 2025

About Us

Early Childhood Intervention Australia Victoria/Tasmania (ECIA VIC/TAS) is the peak body representing Early Childhood Intervention Services in Victoria and Tasmania. ECIA VIC/TAS members are drawn from a diverse range of sectors including Early Childhood Intervention, Early Childhood Education and Care, Pre-School Field Officers, students, and parents/carers/kin. We are the leading voice in Victoria and Tasmania for professionals, children and families accessing Early Childhood Intervention (ECI) supports. We advocate for all children and families to thrive, be included, and participate fully in family and community life.



ECIA VIC/TAS acknowledges the traditional custodians of the lands and pays respect to elders past and present. We pay respects to Aboriginal and Torres Strait Islander children, their families, and we commit to creating a future where every child is valued, safe and an empowered member of their community.

Introduction

ECIA VIC/TAS welcomes the opportunity to contribute to the *NDIS Rules (Support lists) Review*.

We acknowledge the Australian Government's ongoing commitment to ensuring high-quality services for all children, including those with disabilities and/or developmental delays, and their families.

As a membership-based organisation, ECIA VIC/TAS maintains close engagement with early childhood intervention professionals and the families they support. Through this connection, we gain firsthand insight into both the successes and ongoing challenges experienced under the NDIS. We actively promote evidence-informed, best-practice approaches, placing strong emphasis on whole-of-family support that recognises the critical role families play in a child's development and wellbeing.

The NDIS support list has helped build a more consistent understanding of what constitutes a NDIS support, while also reducing misunderstandings and disputes between families and providers. However, there are still opportunities for improvement, particularly in embedding a more child and family-centred approach to ensure the needs of children with disability and their families are properly recognised and addressed. Greater clarity and consistency in defining supports is also essential to reduce confusion, minimise misinterpretation, and enhance transparency across decision-making processes.



Sally Moore
Chief Executive Officer

Key Areas of Feedback

Embed a child and family focus

The current NDIS Rules (Support List) do not adequately reflect a child and family-centred approach. The structure and language of the Rules are primarily designed around individualised, adult-oriented disability support models, with limited recognition of the unique developmental needs of children or the central role families play in their care.

This stands in contrast to evidence-informed best practices in early childhood intervention (ECI), which emphasise a family-centred and capacity-building approach. For example, under the category *Assistive products for personal care and safety* in the 'In' list, the support is described as “*services to assess and prescribe, deliver, adjust and train a participant in the successful use of an assistive product.*” This framing focuses narrowly on the individual use of assistive technology, without acknowledging the critical role of families in supporting their child's use of such products in everyday routines. It also fails to consider whether the support is appropriate to the child's age and developmental stage.

We recommend that the Rules are better aligned with evidence-informed best practice in ECI and ensure that NDIS supports are more responsive to the needs of children and their families. Specifically, the Rules should:

- Recognise families as essential partners in a child's development and ensure supports are designed to strengthen their capacity.
- Ensure that supports for children are developmentally appropriate and family centred.
- Clarify that the purpose of NDIS funding for children is not just to address functional impairments, but to promote meaningful participation in everyday life, particularly in early learning, play, and community.

Provide clarity and consistency for replacement items

There is an urgent need for the NDIS Rules and associated guidance to be clearer, more consistent, and developmentally responsive. The current lack of clarity leads to unnecessary administrative burden, inefficient use of limited therapy funding, and delays in delivering essential supports to children. A more transparent and family-centred approach within the Rules would reduce these barriers and promote better outcomes for children and their families.

The below ‘real-life’ case illustrates how ambiguity in the NDIS Rules can result in delays, inefficiencies, and wasted resources.

A four-year-old non-verbal child was assessed by a speech pathologist and found to respond well to the Augmentative and Alternative Communication (AAC) app Proloquo2Go trialed on the therapist’s iPad. Based on this, the therapist recommended a cost-effective solution: purchasing an iPad and the Proloquo2Go app for the child — a total cost of approximately \$1,000, significantly less than alternative AAC devices costing upwards of \$5,000.

However, the funding request was denied on the basis that “NDIS does not fund tablets.” The therapist was advised that to pursue the request as a replacement support, she would need to submit additional paperwork and reassessment. This process required a further five hours of therapy funding to rewrite the original report and complete the necessary forms — all to justify a low-cost, appropriate support that had already demonstrated success in a trial.

We recommend that the NDIS Rules and operational guidelines are clarified and streamlined to reduce delays, improve consistency in decision-making, and ensure children have access to the right supports at the right time, while preserving limited therapy funding for direct, impactful work with families. Specifically, this should include:

- A simplified process that provides a fast-tracked pathway for commonly prescribed items with clear developmental benefits, reducing administrative burden on therapists and families.
- Explicit guidance for planners and providers that reflects best practice early childhood intervention, including the importance of timely provision of supports for children.
- Clear criteria for when low-cost, mainstream devices can be considered reasonable and necessary supports, including as replacements.

Define supports clearly to reduce misinterpretation

The lack of clarity in how certain supports are defined within the Support Lists creates confusion and significant variability in interpretation and decision-making. There is a need to provide greater clarity of what items can and cannot be funded that uses clearer definitions, plain language, and examples to ensure children and families can access the supports they need with greater confidence and transparency.

Recommendation 25 of the NDIS Review Final Report¹ (2023) highlights the need for greater transparency and clarity in decision-making. Enhancing the clarity and interpretability of the Support Lists is critical to reducing administrative burden, improving participant experience, and ensuring more equitable access to essential supports.

For example, under the category *Early intervention supports for early childhood* in the 'In' list, the item '*a key worker for a child's family*' lacks sufficient detail and may be confusing for families. Without clear guidance on what constitutes a key worker can lead to inconsistent access and understanding. Clearer definitions and practical examples are needed to ensure families can confidently understand and advocate for the supports they are entitled to.

We recommend that the NDIS Rules (Support lists) provide clearer definitions and guidance for ambiguous support items including practical examples that reflect diverse participant circumstances, particularly for children and families. This should include:

- Simple and clear definitions, that account for different circumstances.
- Context-specific examples.
- Plain language explanations of commonly misunderstood or misinterpreted supports.
- Consistent application of definitions across planners, providers, and decision-makers to reduce confusion and variation in outcomes.
- Ongoing review of ambiguous terms with input from participants, families, and professionals to improve clarity over time.

¹ [Working together to deliver the NDIS. NDIS Review: Final Report](#)

Implementation of the Support Lists

As highlighted above, the inconsistent application of the implementation of the Support Lists brings about confusion and a lack of clarity for both families, providers and the agency. The result, administration burden, overuse of funds, and poorer outcomes for children and families.

ECIA VIC/TAS puts forward the following recommendations to implement the Support Lists.

1. Extensive training for all agency staff members on the following:
 - Best practice approaches as described as in the National Guidelines Best Practice in Early Childhood Intervention²
 - Training in what a quality service in early childhood intervention encompasses and how the items of the Support List can be applied
 - How the Support Lists interact with the NDIA Early Childhood Approach³
2. Training in the specific technologies that support children's communication and participation in all aspects of community life including:
 - The lost cost hardware available including iPads
 - The apps that are available only on low-cost devices such as iPads that support communication and participation
 - Items that promote physical inclusion in community
3. Updating of the Support Lists to include specific exceptions to the lists, such as iPads when loaded with specific communication apps such as Proloquo2go to enable a child to have a voice

² [ECI Best Practice Guidelines - Early Childhood Intervention Australia Victoria/Tasmania](#)

³ [Early childhood approach | NDIS](#)

ECIA VIC/TAS would like to thank all members for their contributions to this submission and their ongoing commitment to supporting children with developmental delay or disability and their families, thrive and participate in their communities.

This submission is available on the ECIA VIC/TAS website. Please visit www.eciavic.org.au