
PODC Submission on the NDIS Supports List and Replacement Supports

Submission to: National Disability Insurance Agency (NDIA)

Re: Review of Funded Supports List and Replacement Support Policies

From: Parents of Deaf Children (PODC)

www.podc.org.au | info@podc.org.au

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1. About PODC

Parents of Deaf Children (PODC) is a New South Wales-based organisation that has supported families of Deaf and hard of hearing (DHH) children for over 60 years. We advocate for access, inclusion, and the right of every Deaf child to develop language, identity, and connection in a way that reflects their needs.

Since the rollout of the NDIS, PODC has supported hundreds of families through the planning process, helping them navigate access to technology, therapy, and inclusive supports. We have seen firsthand the extraordinary impact these tools can have on a Deaf child's life — and the devastation when they are denied.

2. Overview of Concerns

PODC welcomes the opportunity to provide feedback on the NDIS supports list and the treatment of replacement supports, particularly for Deaf and hard of hearing participants. We are concerned that recent shifts in funding practice — including the reclassification of essential access tools as “non-routine” — are resulting in:

- Unjustified delays
- Denials of previously approved supports
- Burdensome administrative processes
- A growing gap between functional need and approved supports

This disproportionately impacts Deaf and hard of hearing participants, who often rely on specific tools to access language, communication, therapy, and community life.

3. Key Issues Identified in NDIA Data

Between July 2024 and January 2025, NDIA data shows:

- 611 requests for replacement supports were submitted
- 67 requests (11%) came from participants with hearing loss, although they represent only 3% of participants
- Only 167 were approved
- 64 were denied
- 380 (62%) remained unresolved at the time of reporting

“These requests were often for technology to support communication, such as tablets or watches that assist with awareness of time and transitions.”

— NDIA Participant Funded Supports Report, Section 2.5, p. 22

This overrepresentation highlights a significant unmet need and suggests a misalignment between policy interpretation and the real-world access needs of Deaf participants.

4. Access vs Support: A Clarification

Many of the tools now subject to replacement review — including tablets, smartwatches, vibrating alert devices, and AAC-enabled phones — are not general support items. They are:

- Communication access tools (e.g., Auslan, captioning, AAC)
- Safety tools (e.g., vibration alerts, wearable timers)
- Social and community participation tools (e.g., video calling with peers, mentors, or therapists)
- Visual regulation supports for non-verbal or semi-verbal children

Delaying or denying these tools is not a neutral act — it denies functional language access, especially for Deaf children who may not use spoken language or auditory cues.

5. Rights and Obligations

Access to communication is a recognised human right under the UN Convention on the Rights of Persons with Disabilities (Articles 9 and 21) and is a core priority under Australia’s Disability Strategy 2021–2031.

The continued delay or denial of access-related tools contradicts these commitments — and risks reinforcing the very inequities the NDIS was created to address

6. Recommendations

a) Reinstate routine funding for replacement of access-related technology

Where an item was previously funded and is still required for access to communication, safety, or regulation, its replacement should not require extensive new justification.

b) Create a distinct access category in the supports list

The current categories do not adequately capture communication access or language rights. A dedicated access category would support fairer decisions for Deaf and hard of hearing participants.

c) Use functional justifications, not impairment-based assumptions

Replace assumptions about severity or device use with practical questions:

- What does this tool allow the participant to do?
- How does this support participation, connection, or safety?
- What is the impact of not having it?

d) Ensure timely decision-making for technology-related requests

With 62% of requests still unresolved, urgent improvement is needed. Language access, therapy attendance, and daily regulation are time-sensitive — not discretionary.

7. Family Impact and Real-World Examples

Families supported by PODC have shared stories of both life-changing access and the severe setbacks caused by delays or denials. These are not hypothetical — they are the lived experiences of our community:

- One family shared how a smartwatch allowed them to silently alert their Deaf teenager during a shark alarm at the beach. The teen was swimming far from shore and could not hear warnings — the watch enabled immediate, safe communication.
- A child who previously felt isolated and disengaged was able to connect with online Deaf community groups through their iPad. For the first time, they participated in real-time conversation, accessed captioning, and immersed themselves in visual language.
- One family reported using their device to stream Christmas celebrations with Auslan interpreting via VRI, ensuring their child could be part of cultural and family traditions.
- Others have used their devices to access Deaf-specific psychology services with remote interpreting, enabling them to receive culturally and linguistically appropriate mental health care.
- A young Deaf person was able to attend a community workshop with live captioning displayed on their iPad — making the content fully accessible for the first time.

These examples reflect how these devices are used every day to:

- Access therapy and peer support
- Maintain safety in public spaces
- Participate in culture, family, and identity
- Prevent language deprivation
- Improve wellbeing, confidence, and autonomy

These are not discretionary supports — they are lifelines.

8. PODC's Position and Commitment

PODC believes that access is not optional — it is a human right. Denying or delaying tools that enable Deaf children to connect, communicate, and participate equally in community life is not aligned with the values of equity or inclusion.

We have seen the enormous benefits of these technologies — and the distress caused when they are removed. We will continue to advocate for systems that respect the lived experience of our families and uphold every child's right to participate, connect, and thrive.

9. Call to Action

We urge the NDIA to:

- Meet with PODC and sector representatives to improve processes around access-based supports
- Reconsider the placement of commonly used communication tools on the “out” list
- Acknowledge that for Deaf and hard of hearing participants, access technology is not a supplement — it is a necessity

We will continue gathering family stories and impact statements to inform future consultation.

Suzanne Robertson

President, Parents of Deaf Children

 info@podc.org.au

 www.podc.org.au



Media release from the Premier of South Australia

[Government overhauls WCH cochlear implant program, supports families impacted since 2006 | Premier of South Australia](#)

Culturally and linguistically diverse Australians Report 2022

[Culturally and linguistically diverse Australians Overview - Australian Institute of Health and Welfare \(aihw.gov.au\)](#)

What You Don't Know Can Hurt You: The Risk of Language Deprivation by Impairing Sign Language Development in Deaf Children

[What you don't know can hurt you: The risk of language deprivation by impairing sign language development in deaf children - PMC \(nih.gov\)](#)

Early Intervention Protocols: Proposing a Default Bimodal Bilingual Approach for Deaf Children

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7477485/>

Language acquisition for deaf children: Reducing the harms of zero tolerance to the use of alternative approaches.

<https://harmreductionjournal.biomedcentral.com/articles/10.1186/1477-7517-9-16>

Successful communication does not drive language development: Evidence from adult home sign.

<https://pubmed.ncbi.nlm.nih.gov/27771538/>

Deaf Children of Hearing Parents Have Age-Level Vocabulary Growth When Exposed to American Sign Language by 6 Months of Age

[https://www.jpeds.com/article/S0022-3476\(21\)00036-6/fulltext](https://www.jpeds.com/article/S0022-3476(21)00036-6/fulltext)

Education and health of children with hearing loss: the necessity of signed languages

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6796673/>

The Design and Validation of a Parent-Report Questionnaire for Assessing the Characteristics and Quality of Early Intervention Over Time

<https://academic.oup.com/jdsde/article/14/4/422/491307>

Acquisition of Sign Languages

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8570554/>

Describe, don't prescribe. The practice and politics of translanguaging

in the context of deaf signers

https://pure.hw.ac.uk/ws/portalfiles/portal/24265674/Describe_don_t_prescribe_The_practice_and_politics_of_translanguaging_in_the_context_of_deaf_signers.pdf

Education and health of children with hearing loss: the necessity of signed languages

<https://pubmed.ncbi.nlm.nih.gov/31656336/>

The effects of sign language on spoken language acquisition in children with hearing loss: a systematic review protocol

<https://pubmed.ncbi.nlm.nih.gov/24314335/>

Critical period for first language: the crucial role of language input during the first year of life

<https://pubmed.ncbi.nlm.nih.gov/26111432/>

Early Sign Language Exposure and Cochlear Implantation Benefits

<https://pubmed.ncbi.nlm.nih.gov/28759398/>

Understanding Language Deprivation and Its Role in Deaf Mental Health

<https://www.jstor.org/stable/26983957#:~:text=The%20book's%20content%20provides%20in,LDS%20affect%20the%20deaf%20population.>

Deaf Children Need Rich Language Input from the Start: Support in Advising Parents

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9688581/>

Language Deprivation Syndrome: A Possible Neurodevelopmental Disorder with Sociocultural Origins

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5469702/>

What you don't know can hurt you: The risk of language deprivation by impairing sign language development in deaf children

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5392137/>

Effects of Early Language Deprivation on Brain Connectivity: Language Pathways in Deaf Native and Late First-Language Learners of American Sign Language

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6761297/>

Responsibility in the Current Epidemic of Language Deprivation (1990-Present)

<https://pubmed.ncbi.nlm.nih.gov/32761503/>

Language Choices for Deaf Infants: Advice for Parents Regarding Sign Languages

<https://pubmed.ncbi.nlm.nih.gov/26603583/>

Discourses of prejudice in the professions: the case of sign languages

<https://pubmed.ncbi.nlm.nih.gov/28280057/>

The right to language

<https://pubmed.ncbi.nlm.nih.gov/24446945/>

Ensuring language acquisition for deaf children: What linguists can do

<https://gallaudet.edu/deafhealth/ensuring-language-acquisition-for-deaf-children-what-linguists-can-do/>

Language and Communication of Deaf and Hard of Hearing Children

<https://www.asha.org/practice-portal/professional-issues/language-communication-deaf-hard-of-hearing-children/>

The Language Experience and Proficiency Questionnaire (LEAP-Q): assessing language profiles in bilinguals and multilinguals.

<https://pubmed.ncbi.nlm.nih.gov/17675598/>

Early Language Acquisition and Adult Language Ability: What Sign Language Reveals About the Critical Period for Language G

<https://academic.oup.com/edited-volume/28159/chapter-abstract/212970837?redirectedFrom=fulltext>

Age constraints on first versus second language acquisition: evidence for linguistic plasticity and epigenesis

<https://pubmed.ncbi.nlm.nih.gov/14642540/>

Neurolinguistic processing when the brain matures without language.

<https://pubmed.ncbi.nlm.nih.gov/29406150/>

Age of acquisition effects on the functional organization of language in the adult brain

<https://pubmed.ncbi.nlm.nih.gov/21705060/>

Dinner Table Syndrome: A Phenomenological Study of Deaf Individuals' Experiences with Inaccessible Communication

https://www.researchgate.net/publication/342623540_Dinner_Table_Syndrome_A_Phenomenological_Study_of_Deaf_Individuals'_Experiences_with_Inaccessible_Communication

Should All Deaf Children Learn Sign Language?

<https://pubmed.ncbi.nlm.nih.gov/26077481/>

Language Deprivation Syndrome: A Possible Neurodevelopmental Disorder with Sociocultural Origins

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5469702/>

Rethinking the critical period for language: New insights into an old question from American Sign Language

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6818964/>