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To: [NDIS Consultations](#)
Subject: Submission to NDIS Supports Consultation: Clarification and Support for Disability-Specific App Funding
Date: Saturday, 26 July 2025 9:52:30 PM

To Whom It May Concern,

I write to bring to your attention several inconsistencies and operational challenges regarding the funding of disability-specific mobile applications through the NDIS. These challenges are significantly impacting the clinical delivery of supports, particularly for participants with intellectual and neurodevelopmental disabilities.

1. Inconsistencies in NDIS Guidelines and Messaging

There is a notable contradiction between documents outlining what constitutes an NDIS-funded support. For instance:

- In the 'Supports that are not NDIS supports' guidance, it is stated that "Dating or relationship services including virtual reality, match makers or Apps" and "Mastermind coaching including Apps and software" are excluded from funding. These exclusions relate to general wellness or lifestyle-focused services.
- However, the FM Application for Replacement Support document allows for the selection of "App for accessibility or communications" as a replacement support, which implies that certain types of apps - specifically those related to disability - are indeed eligible for consideration under the Scheme.

This inconsistency has led to widespread confusion, including incorrect messaging from Local Area Coordinators (LACs) and planners who advise participants and families that "apps are not funded", without acknowledging the critical distinction between general-purpose and disability-specific applications. This messaging undermines informed decision-making and obstructs timely access to evidence-based support.

2. The Role and Necessity of Disability-Specific Apps in Functional Capacity Building

As an Occupational Therapist working extensively with participants who have intellectual and neurodevelopmental disabilities, I have observed significant functional benefits from using disability-specific applications. These applications utilise automated prompting for routines and task initiation, and incorporate both visual elements, such as pictorial schedules, and auditory features including text-to-voice functionality.

These apps have contributed to increased participant independence by improving task initiation and routine adherence. This has, in turn, resulted in reduced reliance on support workers and mitigated caregiver burnout within informal support networks.

The positive clinical outcomes I have observed confirm that these applications are actively addressing impairments associated with reduced functional capacity - aligning precisely with the core intent of the NDIS.

3. The Economic and Administrative Burden of the Replacement Support Process

Under the current process, submitting a Replacement Support Application (RSA) for an app subscription frequently incurs an administrative burden. In practice, the Occupational Therapist completing the application often bills hours equal to, or greater than, the cost of the app's subscription itself. This inefficiency results in funds being consumed in

procedural overheads rather than functional supports.

Moreover, participants often abandon the application process entirely due to the effort required or misinformation received. This leads to missed opportunities for early and effective intervention.

4. Clarifying What Constitutes a ‘Reasonable and Necessary’ App

The existing policy framework lacks clear criteria to distinguish between lifestyle/wellness apps (which are understandably excluded) and essential disability support tools. We urge the NDIA to provide the following:

- Explicit inclusion criteria for disability-specific apps that meet the ‘reasonable and necessary’ threshold
- A published list of app types that fall under “App for accessibility or communications”
- Clearer guidance for LACs and planners to prevent dissemination of inaccurate information

Disability-specific applications that support communication, behaviour regulation, task initiation and completion, and routine represent low-cost, high-impact solutions that contribute to participant independence and the cost-effectiveness of funded supports.

5. Value for Money

Disability-specific apps represent excellent value for money in many cases. A single annual subscription can achieve outcomes that would otherwise require multiple hours of paid support worker time each week. For instance, where participants are unable to follow multi-step instructions due to impairments in cognitive flexibility or working memory, the use of a structured visual schedule app enables independent task completion and reduces paid support needs.

These outcomes are measurable, durable, and consistent with the objectives of the Scheme to increase social and economic participation and decrease long-term support dependence.

Recommendations

To resolve the current ambiguity and ensure equitable access, I recommend that the NDIA:

1. Formally acknowledge disability-specific apps as fundable under the ‘Communication and information equipment’ or ‘Therapeutic supports’ categories where they meet functional outcome criteria.
2. Issue updated guidance for LACs and planners differentiating clearly between excluded general apps and eligible disability-specific applications.
3. Streamline the process for app funding to avoid costly administrative duplication, possibly via an approved apps list or self-managed funding pathway.

Thank you for your attention to this important matter.

Yours faithfully,



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