

**Carers Australia Submission to
the Department of Health, Disability and Ageing on
NDIS Rules: New Framework Planning**



March 2026

About Carers Australia and our feedback

Carers Australia welcomes the opportunity to provide feedback on the *NDIS rules: Public consultation on new framework planning*.

Carers Australia is the national peak body representing Australia's 3 million unpaid carers providing unpaid support to family and friends with a disability, mental illness, chronic condition, terminal illness, alcohol or drug dependence, or age-related frailty.¹ Our vision is an Australia that values and supports all carers, where all carers have the same rights, choices, and opportunities as other Australians to enjoy optimum health, social and economic wellbeing and to participate in family, social and community life, employment, and education.

Carers Australia supports the intent of the new framework planning of ensuring the NDIS is fairer, more transparent, sustainable and person-centred, and the new rules improve the experience of participants and help them get the most out of their NDIS plans and to live the lives they choose.

Family and friend carers of people with disability are critical to the sustainability of the NDIS. They are also central to helping participants get the most out of their plans and to live the lives they choose. Carers must not be overlooked or treated as an optional add-on in the new framework planning. To be aligned with the guiding principles of the *National Disability Insurance Scheme (NDIS) Act 2013*, the new framework planning needs to explicitly recognise the important role of family and friend carers in the lives of people with disability.

Carers Australia supports the four-step process of the new framework plans – preparing for a support needs assessment (Step 1), undertaking the support needs assessment (Step 2), building a plan (Step 3), and using a plan (Step 4). However, a key concern we have is how a participant's disability support needs will be assessed (the Support Needs Assessment) under the new framework planning. Step 2 is pivotal to a participant's plan and funding, but as currently described, it does not adequately involve the input of carers.

Carers Australia recommends that governments explicitly include carers in the new framework planning rules by:

- seeking and recording carer input throughout the assessment and planning process
- seeking verification of assessment reports with participants and carers to ensure accuracy before building a plan and to reduce reliance on replacement assessments
- subsequently updating the NDIS Guidelines to explicitly include carers, aligning them with the new planning rules and the NDIS Act.

These changes are in the interest of the future sustainability of the NDIS. They will also better deliver supports for people with disability, improve their lives and their carers, and this is in the interest of all Australians.

Including carers is essential for NDIS Act alignment

One of the general principles guiding actions under the NDIS Act 2013 is 'The role of families, carers and other significant persons in the lives of people with disability is to be acknowledged and

¹ Parliament of Australia. 2010. Carer Recognition Act 2010. [Federal Register of Legislation - Carer Recognition Act 2010](#).

respected' (Section 4(12) and 4(12A)).² Another is that 'people with disability and their families and carers should have certainty that people with disability will receive the care and support they need over their lifetime' (Section 4(3)).

The Act also requires that, in giving effect to the objectives of the Act, regard is given to the *Carer Recognition Act 2010* (Sections 3(3)).

To be aligned with the NDIS Act, the new framework planning needs to explicitly recognise carers of people with disability. There needs to be processes in place for routinely seeking and recording carer input throughout the assessment and planning process. Having in place processes to systematically collect information from carers will help ensure assessments reflect the participant's support context and this will strengthen both the accuracy of assessments and sustainability of plans.

The rules should have clear pathways for responding promptly to changes in circumstances, including those that affect a carer's capacity to provide informal support (for example, a carer with a recent diagnosis of an illness may not be able to care in the same capacity while undergoing treatment). There should also be mechanisms for ongoing evaluation and review of the planning process, including feedback from participants and carers, to refine the approach over time.

The NDIS Guidelines, which provide the framework for decision-making, equally need to explicitly recognise carers. The new framework planning rules will require the Guidelines to be updated providing an opportunity to include carers. Where participants have a carer they should have an opportunity to provide input (it should not be optional). The Guidelines should be aligned with the rules and reflect the NDIS Act principles and the Carer Recognition Act.

Explicitly include carers in Support Needs Assessments (Step 2)

As the Factsheet – Step 2: Preparing for a support needs assessment states³, the support needs assessment involves a NDIA assessor meeting with participants to understand their daily life, disability support needs and preferences. An accurate assessment of a participant's support needs requires input from key people in their life, including family and friend carers.

The rules currently state that participants will have the option of their nominee, family member or advocate attending when they complete their support needs assessment. The guidance on this step also notes that the assessor will check the information with the participants, and their nominee, family member or advocate if in attendance, to make sure it is correct. The outcomes of the assessment (documented in a support needs assessment) will be shared with participants who in turn can share it with a nominee family member or advocate.

While Carers Australia notes that participants can choose to have a nominee, family member or advocate attend the support needs assessment (noting that the term carer is not used), as currently drafted, there is no expectation that they will be part of the assessment process (let alone be considered integral to the process).⁴ However, carers often hold key information about the circumstances and support needs of the person they care for, including the level of informal support required and the informal support available to the participant.

² Australian Government. 2013. [National Disability Insurance Scheme Act 2013](#).

³ Department of Health, Disability and Ageing. 2026. [New Framework Planning Rules: Step 2 – The Support Needs Assessment \(Fact Sheet\)](#).

⁴ Australian Government Department of Health, Disability and Ageing. 2026. [New framework planning](#).

Not including carers in support needs assessments risks assessors not capturing the full picture of a participant's support needs or understanding of a carer's functional capacity to provide support and care and an incomplete picture is likely to result in inadequate or poor assessments. Inadequate assessments of support needs will *not* improve the experiences or lives of participants. Also, an inadequate assessment that creates a budget and plan that shifts the distribution of formal and informal care (a decision that could be made without a carer's input) could negatively affect the wellbeing of a carer and, in turn, their capacity to continue to care. This would have implications for the quality of informal care provided and the sustainability of the NDIS.

On this point, the World Bank Group⁵ recently noted that, 'the well-being of caregivers has been largely overlooked' in policy discussions on the relative effectiveness of various care models. It is important that a whole of care system perspective is taken when designing and implementing policies. This includes considering how the different components (formal and informal care) interrelate and how changes in one area could affect other areas (and people).

The rules note that the NDIS Review recommended a new support needs assessment process that is 'consistent, holistic and person-centred'⁶. The new support needs assessment process fails on the 'holistic' criteria by not ensuring that where participants have a carer that they are given an opportunity to provide input into the support needs assessment. And arguably, where carer input is not considered, the new support assessment process would also fail on the 'person-centred' criteria because the outcomes would not necessarily improve the lives of participants.

"When dealing with NDIS you have to present your case as if they have no information about your child whatsoever. Despite annual reports stating that my daughter needs constant supervision they always need this explained. I can never assume that they know what my daughter's needs are. Which is ridiculous since she has been receiving support for about 8 years now." Anonymous, Carer Wellbeing Survey 2025.

Carers' role in the Personal and Environmental Circumstances Questionnaire

The Personal and Environmental Circumstances Questionnaire (PECQ), which is part of the Support Needs Assessment in Step 2, should also have input from carers. Again, this is about ensuring assessors get a complete picture about a participant's personal and environmental context including their living arrangements, employment and/or learning, and informal support.

Carers are a key source of information on day-to-day context and can provide additional insights where needs fluctuate or communication is difficult, and they can support accuracy, completeness and cultural safety during PECQ administration. Properly engaging carers will ensure PECQ aims are achieved and reduce the risk of overlooking critical environmental and social determinants.

⁵ The World Bank Group, *Why Should We Care About Care? The Role of Informal Childcare and Eldercare in Ageing Societies*. p. 9.

⁶ Department of Health, Disability and Ageing. 2026. [New Framework Planning Rules: Step 2 – The Support Needs Assessment \(Fact Sheet\)](#). p. 2.

Recent analysis of service-usage data from Kismet, a health tech company that operates as a plan manager for the NDIS, found that 34% of participants were using less than half of their allocated budget.⁷ The large underspending among a third of participants may suggest a misalignment between plans and people’s support needs (it may also mean that formal services are not available). There will, however, be implications for both participant’s support needs and the level of informal care; and insights from both participants and carers will be important for assessing support needs.

“Caring for a daughter who has serious behaviors of concern is very challenging especially as we get older. Not only is it becoming harder to cope with behaviors, but it is also almost impossible to cope with the NDIA, which simply doesn’t get our daughter’s disability.” Anonymous, Carer Wellbeing Survey 2025.

“The biggest impact to my caring role has always been dealing with the NDIS to make sure my son’s plan is in line with what he needs and deserves for supports.” Anonymous, Carer Wellbeing Survey 2025.

Carer capacity and future availability

It is essential that assessors record carer’s capacity and expected availability to provide support in the short, medium and longer term. Without this information, plans risk being built on inaccurate assumptions that a carer can continue to provide the same level of informal support. This can lead to plans that unintentionally and inappropriately rely on carers whose circumstances may change significantly, such as those managing their own health conditions or receiving a new diagnosis that will reduce their ability to provide care. Ensuring that carer capacity is explicitly documented will support more realistic and sustainable plans, better safeguard participants, and uphold the NDIS Act’s principles recognising and respecting the role of families and carers.

“As I am getting older, and my husband’s disability is getting worse, I find that being a sole carer is becoming more demanding for me and a lot more difficult. My health and strength are not as good as it used to be, but I feel that I have to manage regardless of the difficulties, and find that the red tape around accessing services is a big problem that perhaps should be addressed by the government bodies.” Anonymous, Carer Wellbeing Survey 2025.

Informal supports identified by a participant during the PECQ semi-structured interview should also be confirmed with the carer. Plans should not rely on unverified assumptions that a carer can continue providing certain supports; for example, a participant may state that their carer will manage all transport needs, even though the carer may be elderly, have vision or mobility

⁷ Akyol & Gibbons, e61 Institute, 2026. [NDIS Budget Utilisation Note](#).

limitations, or lack the financial means to continue doing so. Carers should have the opportunity to clarify what support they can provide, and the NDIA should formally consider a carer's functional capacity and personal circumstances when determining the extent of informal support. It is important to note that participant consent should not be required solely to confirm with a carer whether they can undertake the tasks attributed to them, noting that consent would still apply to other forms of involvement. This safeguard is essential to avoid placing unrealistic expectations on carers and to ensure that participant plans are safe, equitable and sustainable.

Processes could be more efficient, transparent and effective

Several aspects of the current draft rules risk limiting the accuracy, transparency and effectiveness of Step 2, particularly around how carer's knowledge about a participant's disability support needs and circumstances are considered.

1. Carer presence is optional and report input is late

The Step 2 fact sheet frames family/carer involvement in the support needs assessment as optional and states that participants receive a copy of the support needs assessment report after it has been submitted to the NDIA delegate. This arrangement increases the risk of inadequate assessments/errors and the need for a replacement assessment.⁸

2. No pre submission verification of the report

The NDIS Act (S32L) requires the assessment to use the assessment tool (S32L(2)), and for a needs assessment report to be prepared and provided to the CEO, with a copy sent to the participant (S32L(6), (6A)).⁹ As currently framed, there is no pre-submission confirmation step with the participant (and, with consent, their carer) to verify factual accuracy of the report prior to plan-building. This sequencing has the potential to undermine accuracy and efficiency and could reduce confidence in the process.

3. Efficiency and fairness

Reliance on replacement assessments to correct errors is inefficient and potentially stressful for participants. A front-loaded verification step is more consistent with the new framework planning objectives of fairness, consistency and transparency.

Participants and carers should be informed when a plan assessment is being initiated, including how and when they will be contacted. Many carers miss calls from private numbers or fail to understand or relay important information, leaving both the participant and carer unprepared for the assessment process. Similar issues arise where letters or emails are overlooked or not received. Clear, accessible, and reliable communication protocols are essential to ensure participants and carers are aware of assessment appointments in advance and can participate meaningfully in the process.

⁸ Department of Health, Disability and Ageing. 2026. [New Framework Planning Rules: Step 2 – The Support Needs Assessment \(Fact Sheet\)](#).

⁹ Australian Government. 2013. [National Disability Insurance Scheme Act 2013](#).

Recommendations for Step 2 rules and practice

1. Invite carers to be part of the support needs assessments

Assessors should proactively invite the participant's carer(s) to attend support needs assessments. Carers should also be able to provide input to the support needs assessments through flexible modes of engagement, including in-person, phone or video.

2. Pre submission verification of assessment reports with participants and, where appropriate, carers, to ensure accuracy before plan building

Before submitting the Support Needs Assessment Report to the NDIA delegate, the assessor should review the Report with the participant and their carer, ensuring that the information provided is accurately captured in the Report and any points of disagreement are clearly recorded. Participants should also be offered the option of a plain-language summary of the report.

3. Use of carer input to reduce reliance on replacement assessments, delivering a more efficient and accurate pathway to plan development

Introducing a pre-submission verification process where the assessor reviews the draft assessment report with the participant and their carer, could reduce the need for replacement assessments and makes the overall NDIS planning process more efficient and effective.

Replacement assessments should be a last resort and only used when a pre-submission accuracy check has already taken place or when genuinely new and material information emerges.

These changes directly support the objectives of the new framework planning rules on fairness, consistency, transparency, and person-centred decision-making; and align with the legislative requirements of Section 32L of the NDIS Act.¹⁰

Summing up

The proposed changes will benefit NDIS participants, carers, and the sustainability of the NDIS. They will improve accuracy and fairness and result in more complete, context-rich assessment reports. Planning processes will be more efficient with fewer replacement assessments and faster plan finalisation. The changes should also strengthen trust and transparency by clarifying the roles of participants and carers and providing assurance that key information is used to build plan budgets.

¹⁰ Australian Government. 2013. [National Disability Insurance Scheme Act 2013](#)

About Carers

Our definition of a carer aligns with the Carer Recognition Act 2010:

Section (1) For the purpose of this Act, a carer is an individual who provides personal care, support and assistance to another individual who needs it because that other individual:

- a) has a disability; or
- b) has a medical condition (including a terminal or chronic illness); or has a mental illness; or
- c) is frail and aged.

Section (2) An individual is not a carer in respect of care, support and assistance he or she provides:

- a) under a contract of service or a contract for the provision of services; or
- b) in the course of doing voluntary work for a charitable, welfare/community organisation; or
- c) as part of the requirements of a course of education or training.

Section (3) To avoid doubt, an individual is not a carer merely because he or she:

- a) is the spouse, de facto partner, parent, child or other relative of an individual, or is the guardian of an individual; or
- b) lives with an individual who requires care.

Carers Australia also recognises carers who provide unpaid care for people experiencing drug and substance issues.

Key Statistics



3 million carers across Australia *



11.9% of people in Australia are carers *



11% of carers are aged under 25 years (391,300); an increase of 60% since 2018*



30% of primary carers cared for 40 hours per week or more*



4.6% of all people in Australia (1.2 million people) are primary carers, those who provide the most informal care support to a family member or friend *



43.8% of primary carers have disability themselves*

Source: * [Australian Bureau of Statistics. 2022. Survey of Disability, Ageing and Carers](#)

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