

# Submission National Disability Insurance Scheme Amendment (Securing the NDIS for Future Generations) Bill 2026

## About us

ECIA VIC/TAS represents more than 500 professionals and stakeholders working with children aged 0–9 years with developmental delay, developmental concerns, or disability. The submission responds to the National Disability Insurance Scheme Amendment (Securing the NDIS for Future Generations) Bill 2026 and focuses on implications for children, families, and early childhood intervention (ECI) services.

## Summary

ECIA VIC/TAS submission supports a sustainable NDIS for children with significant and permanent disability now and into the future. Supports for children must be flexible, evidence-based and responsive to their needs as they grow and develop. Children must be viewed in the context of their family when support budgets are being constructed and reviewed.

## Executive Summary

Reform must not create service gaps for children and families. ECIA VIC/TAS warns that children are already experiencing significant barriers to accessing timely support, including long wait times, navigating complex service systems with little support, and increasing developmental vulnerability. Transition arrangements between NDIS and Thriving Kids must be transparent, coordinated, and implemented gradually to prevent children falling through service gaps.

There are a number of reports evidencing children and families are struggling.

The evidence shows:

- Only around half of Australian children are developmentally on track at school entry.
- Developmental vulnerability is increasing.
- Vulnerability is higher among disadvantaged, First Nations, CALD, rural and remote communities.
- Children with disability experience higher rates of exclusion from early childhood education and care.

## Recommendations

ECIA VIC/TAS members are seeking:

1. Clear communication to families and providers during this time of transition
2. Opportunities for consultation with providers and families
3. Plans that reflect a child/family need that do not limit access based on caps to categories
4. Reviewed NDIS processes to reduce wasting of funds
5. Assessments completed in all natural settings a child engages in to obtain a complete and comprehensive picture of both the child and family functioning.
6. Reports completed by allied health/ECI professionals working with the child and family considered during assessment, eligibility and budget building
7. Assessments are completed by suitably qualified and trained practitioners
8. The family or their representative are able request a re-assessment as soon as needs change
9. The assessment and reassessment processes must be designed to be culturally safe, psychologically safe and build trust
10. Families must be able to access NDIS funded services as soon as they meet eligibility requirements based on functional need, not following exhaustion of all other service options
11. The impact of compounding family complexities and vulnerabilities be considered when building plans
12. A comprehensive workforce strategy that links tertiary study to long term employment in place
13. Attraction and retention strategies to ensure stability of the workforce
14. High quality paid student placements within the ECI sector with provider reimbursements covering the true cost of hosting students
15. Development of nationally consistent competencies across disciplines to ensure best practice approaches
16. Fund the true cost of collaboration across disciplines and sectors
17. Risk proportionate registration building on existing mechanisms for all disciplines
18. Simplification of the auditing process and requirements to reduce fiscal and time costs

## **Child safety and quality depend on services being delivered in natural settings**

The safety of children should be central to the provision of all NDIS funded supports. ECIA VIC/TAS argue that early childhood intervention services delivered in homes, early learning settings and communities are critical to:

- identifying child safety concerns early,
- supporting family wellbeing,
- monitoring vulnerability and exclusion,
- strengthening participation and inclusion.

ECIA VIC/TAS members report that reductions in travel funding have substantially reduced outreach services. Pricing arrangements should adequately fund outreach and travel to support evidence-based practice in natural environments.

## **The early childhood intervention workforce is under significant pressure**

The proposed reforms risk weakening the specialised early childhood intervention workforce required to support children with significant disabilities and their families. Government should develop a comprehensive workforce strategy covering attraction, retention, paid placements, competency frameworks, supervision and professional development.

Members report:

- increasing reliance on less experienced practitioners
- declining retention of experienced clinicians
- reduced capacity for supervision and mentoring
- financial pressures limiting student placements and graduate programs
- stagnant pricing structures that do not reflect the cost-of-service delivery

## **Family wellbeing must remain central to NDIS policy**

The submission presents evidence that many families of children with disability experience:

- limited social participation,
- reduced workforce participation,
- high caring responsibilities,
- barriers to community inclusion and advocacy.

ECIA VIC/TAS expresses concern that proposed interpretations of "reasonable and necessary" supports may place greater expectations on families without recognising the substantial caring load they already carry. Core supports that enable family functioning, community participation and caregiver sustainability should be preserved, be flexible and responsive as needs change.

### **Assessment and planning processes must be holistic and flexible**

Planning should be needs-based, family-centred and responsive to changing circumstances rather than driven by standardised funding categories or narrow assessment tools.

The submission raises concerns about:

- excessive reliance on functional capacity assessments
- assessments that fail to consider the child's full family and environmental context
- funding caps that may effectively prescribe support levels without regard to individual need
- delays caused by requiring families to exhaust other service options first

ECIA VIC/TAS argues that assessments should:

- occur across all environments where a child lives, learns and plays
- incorporate evidence from treating practitioners
- consider intersecting vulnerabilities
- avoid creating additional trauma through repeated reassessment

### **Reform risks disproportionately affecting vulnerable families**

ECIA VIC/TAS submission highlights concerns that the proposed framework does not adequately account for overlapping and compounding vulnerabilities or disadvantage. Assessment and planning frameworks should explicitly recognise cumulative vulnerability and whole-of-family circumstances including:

- Aboriginal and Torres Strait Islander peoples
- CALD backgrounds
- family violence
- housing insecurity and poverty
- rural and remote location
- child protection involvement
- disability within the family

## Greater flexibility is needed in reassessments and funding periods

Reassessment processes and funding periods should support flexibility and continuity of care. The submission supports NDIS sustainability reforms but argues that sustainability cannot be achieved solely through tighter eligibility, planning and funding controls. Long-term sustainability depends on maintaining early childhood intervention quality, supporting families, strengthening the workforce, and ensuring children receive timely, flexible and evidence-based supports during a period of major system transformation.

The organisation is concerned that proposed reassessment arrangements:

- increase NDIA control
- reduce family capacity to seek reassessment
- limit responsiveness to changing needs
- may disadvantage families facing crises or communication barriers

Similarly, rigid funding periods are reported to create:

- interrupted care
- administrative burden
- difficulties participating in longer-term programs
- reduced service flexibility

Long-term sustainability depends on maintaining early childhood intervention service quality, supporting families, strengthening the workforce, and ensuring children receive timely, flexible and evidence-based supports during a period of major system transformation.