

## On the NDIS and its Typical Support Packages

Since the early development of the NDIS there has been indications of Typical Support Packages (TSPs). The Agency keeps them pretty secret: attempts to get information via Freedom of Information or as evidence in AAT reviews have all failed.

The NDIS website makes a few mentions of TSPs. They are as follows.

- Its [How do we identify and describe a support in your plan? Web page](#) (1/7/2022) says only “When we assess your support needs and identify what supports to consider in your plan, we use ... the Typical Support Package for people aged 7 years and older.”
- Its [Fair for everyone, both today and for future generations web page](#) (24/5/2023) says:

We use Typical Support Packages to help us do this. The Typical Support Package gives us an indication of what supports we'd usually expect to include in your plan, based on your situation and disability support needs.

Each support in your plan must be reasonable and necessary, but they also need to be reasonable and necessary as a package of supports. We approve your whole plan, not the individual supports in your plan in isolation. The Typical Support Package helps guide this validation process.

The Typical Support Package also helps to guide the consistency of our decision making process. We use these to check your overall plan to make sure that all your supports make sense together, and that your support types and amounts will complement each other to help you fulfil an ordinary life.

- Its [\*How do we decide what reasonable and necessary supports to include in your plan? web page\*](#) (1/7/2022) says:

To help us work out what supports to consider for people aged 7 years and older, we also use a 'Typical Support Package'. We worked with people with disability, professionals and subject matter experts to develop the Typical Support Package.  
It helps us work out the types of supports we'd usually expect to include in your plan. It's based on your situation and support needs.

We then amend the supports suggested by the Typical Support Package to include more, less or different supports if we need to. ...

- According to Google, the other pages that mention TSPs are:
  - <https://www.ndis.gov.au/media/3128/download>
  - [\*Is the support value for money?\*](#)
  - <https://www.ndis.gov.au/media/5387/download>
  - <https://ourguidelines.ndis.gov.au/media/1651/download>
  - <https://ourguidelines.ndis.gov.au/media/1542/download>
  - <https://www.ndis.gov.au/media/3579/download>

More recently, the NDIS Review mentioned TSPs - see <https://www.ndisreview.gov.au/resources/reports/what-we-have-heard-report/defining-reasonable-and-necessary>

## What you told us is not working

From what you told us we understand:

- ...
- It is not clear to participants how 'Typical Support Packages' have been put together or how they have been used.
- ...

From what we can see, it's not just the participants for whom TSPs are "not clear", it is everyone. This lack of transparency, contrary to the Minister's and the Agency's stated goals of "transparency", is unacceptable.

The NDIS Review is asking for commentary on this.

Some points of notice follow.

1. The NDIS was founded on the promise of providing individualised support plans. The TSP concept is the complete opposite. One questions whether the NDIS using TSP in planning is even legal.
2. The government and the NDIA claim they want to be transparent and build trust. The conduct around TSPs is the opposite.
3. There is no co-design or community consultation about TSPs.
4. There is no discernible validation of TSPs. The NDIA should not use unvalidated methods in NDIS plan development.
5. In relation to autism, which has spectrum in its full name, there needs to be very clear indications that anything like a TSP recognised and

respects the spectrum nature of autism. There is no discernible indication that the reasonable and necessary recognition and respect exist in the NDIA's TSPs for autistic NDIS participants.

## **Proposed principles**

A4 does not suggest solutions. The only solutions that work are solutions created by the people who implement them: anyone asked to implement someone else's idea or solution will "implement" for failure to show that their own idea was better. It may be possible to get around this effect by having solution implementers design a solution that they feel is theirs, a solution they own ... hopefully with input and approval/agreement from stakeholders.

It is likely that the NDIS needs systematic support for its planning processes and decisions.

As a starting point for NDIA officials to develop a solution that they own, that they feel committed to, A4 offers the following guiding principles for an automated system that supports NDIS planning.

1. Participant quality of life and well-being should be central to the NDIS planning process. Planning must respect and address the needs of all participants; it cannot be based on any notion of "typical" participant or participants.
2. The plan validation process should respond to all an applicant's goals and support request.
3. Information from a) the participant's goals and support requests, b) the comprehensive list of all a participant's available diagnoses and conditions, c) all a participant's available functional assessments and relevant recommendations, must be recognised and addressed in planning.
4. A participant's plan validation process should aim to identify gaps in support needs. It may need some implicit goals relating to diagnoses, combinations of conditions, and pointers from functional feature of the individual. If a common goal for a diagnosis, condition, or functional characteristic is omitted, there should be a formal reason recorded.
5. Systems need to learn from experience. The effectiveness of supports in previous plans for the individual must inform forward planning. A NDIS plan must not do the same thing and expect a different outcome (it can keep, doing the same thing if it works – that is called support). This requirement implies that the success of plan elements will be measured, reported, and reviewed.
6. The "individual" aspect of support systems is essential; there is no place in the NDIS for "typical" anything.
7. The methods used in the system need to be agreed with representative bodies and stakeholders. They need to be subject to continuous improvement (that is measured and reported).

Yours sincerely

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