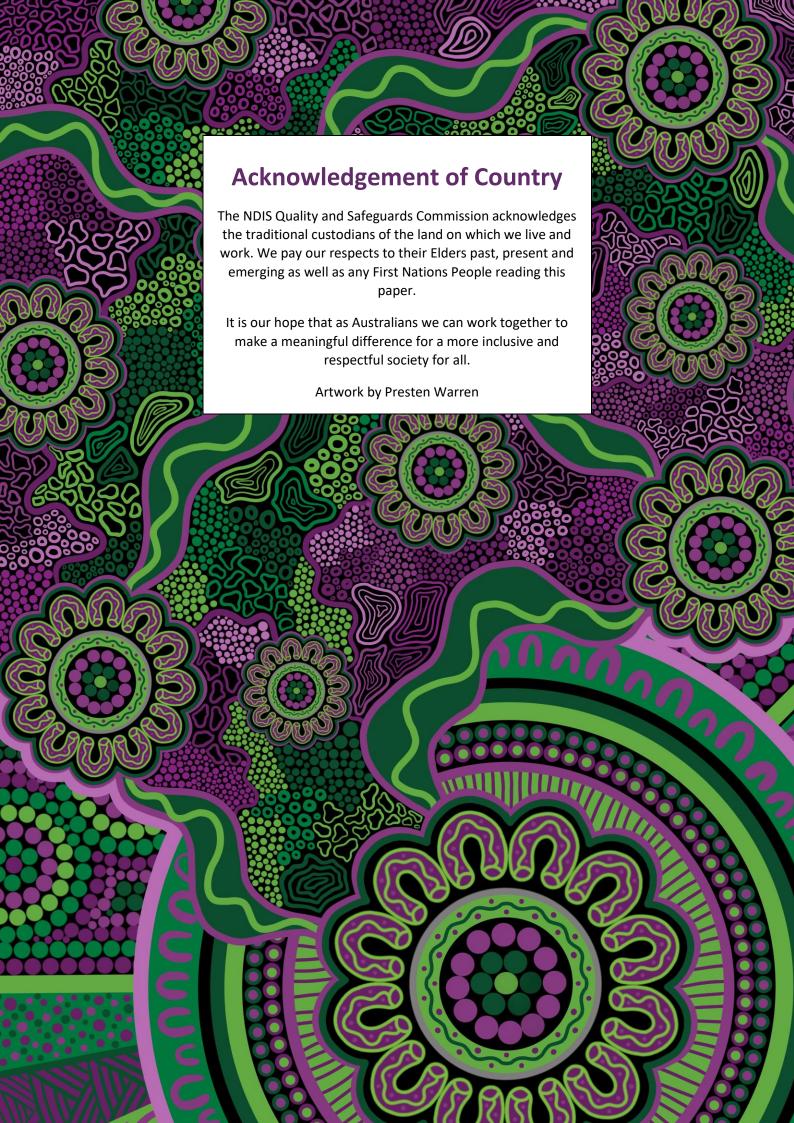


Mandatory Registration of Supported Independent Living (SIL) and Support Coordination

What we heard July 2025



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Executive summary

This report is prepared by the NDIS Quality and Safeguards Commission (NDIS Commission). The NDIS Commission upholds the rights of NDIS participants and oversees provider quality.

In this report, we share what we heard from people across Australia during national consultations on proposed mandatory registration reforms focussed on Supported Independent Living (SIL) and support coordination.

The report explains why we need the changes, what they aim to do, and how they might affect participants and providers. It includes feedback from 447 individuals and organisations. Most people supported better safeguards, but there were also concerns, like the risk of losing trusted supports and the extra pressure the changes might put on small providers.

We've also included key risks, suggested practical solutions, and set out what we plan to do next to make sure the changes are fair, clear, and focused on the needs of participants.

Many responses came from providers who are currently unregistered. This makes sense as they are the ones who would be most directly affected by the proposed changes.

What we wanted to know

We asked for feedback on the changes and how we plan to introduce mandatory registration for SIL and Support Coordination providers.

We were especially interested in how these changes might affect NDIS participants and their access to supports, and providers and how they manage the transition to mandatory registration.

Who we heard from

We talked to a range of people, including:

- participants and their supporters;
- workers;
- providers;
- peak bodies; and
- other government agencies.

We received:

- **413 survey responses** (85 responses from participants and their supporters, and 326 responses from providers); and
- 34 submissions (from participants, community organisations and the disability sector, providers and provider peak bodies, auditors and workforce and carer representative organisations).

What we heard

 People said SIL and Support Coordination providers play a vital role in participants' lives, offering both practical help as well as emotional and social support;

- many were worried that these providers might leave the NDIS if the proposed changes went ahead;
- despite those concerns, most people supported the goal of improving service quality and participant safety. These goals were seen as important and worthwhile;
- as the consultation was mostly about getting feedback to help plan how changes would be rolled out, we did not provide full details about what the changes would involve;
- as a result, people said they needed more information and clearer communication about the transition process;
- some key details, like how the changes would work in practice, were missing or unclear;
- providers especially felt uncertain about what would be expected of them, when things would happen, and why; and
- even though we shared some timing information, many still felt confused about next steps.

Four common themes came through in the feedback:

- 1. **Cost pressures**: Many unregistered providers were worried about how much it would cost to meet the new requirements. They also raised concerns about the extra administration work and general uncertainty about the overall cost of compliance.
- 2. Fairness and flexibility in registration requirements: People stressed the need to consider differences between providers, like their size, location, type of service, and existing accreditations. There were specific concerns for providers:
 - a. offering culturally sensitive and trauma-informed services, and
 - b. those in rural and remote areas, where audits may be hard to access and expensive.
- 3. **Keeping current supports in place**: Participants and their supporters were concerned that if their trusted provider couldn't meet the new requirements, they'd lose access to that support. Finding a new provider can take a lot of time and effort, and starting over can be stressful and disruptive.
- 4. **Need for clearer information about the transition:** Both participants and providers said they don't yet have enough information about how the changes will work, when they will happen, or how they will be affected. They asked for clear, consistent and accessible information to help them prepare.

Suggestions from providers to improve the transition process included:

- adapting the process to suit different types of providers;
- offering financial help to cover registration and audit costs;
- allowing more flexible timelines and ways to meet the requirements; and
- recognising existing professional memberships or accreditations when deciding who needs to register.

Next steps

We will hold more targeted consultations with those most affected by the changes. What we have heard in this round will help shape how the NDIS Commission plans and rolls out the new requirements.

Glossary

Choice and control: A participant has the right to make their own decisions about what is important to them and to decide how they would like to receive their supports and who from.

Conflict of interest: When a person or organisation has an opportunity to put what will benefit them (their own interests) ahead of the interests of the person they are supporting. In the NDIS, this can mean limiting a participant's choice or influencing their decisions unfairly.

Current registration model: The current requirements and rules for NDIS providers to register with the NDIS Commission.

NDIS (National Disability Insurance Scheme): A national program that supports people with disability. It's run by the National Disability Insurance Agency (NDIA).

NDIS Practice Standards: The quality rules registered providers must meet to deliver supports and services under the NDIS.

Mandatory registration: The requirement for NDIS providers to be registered with the NDIS Commission to deliver identified classes of supports. We are consulting on how to apply this requirement to three additional classes of support: Platform Providers, Supported Independent Living (SIL) and Support Coordination.

Market (NDIS Market): A collection of providers offering products and services to participants.

Participants (NDIS Participants): People who apply and meet the eligibility criteria for the NDIS.

Support Coordinator: A Support Coordinator or Specialist Support Coordinator delivers Support Coordination services. Support Coordination helps NDIS Participants make the best use of the supports in their plan.

Supported Independent Living (SIL): A type of home and living support that provides support and/or supervision of daily tasks to help people live as independently as possible.

Supporter of an NDIS participant: A carer, guardian or family member of an NDIS Participant.

Worker: An individual who delivers NDIS funded supports or services to an NDIS Participant. A worker may be a NDIS provider or employed or engaged by a NDIS provider (registered or unregistered).

Background

On 16 September 2024, then Minister for Government Services and the NDIS, the Hon Bill Shorten, announced that Platform Providers, support coordinators, and Supported Independent Living (SIL) providers would need to register with the NDIS Quality and Safeguards Commission (NDIS Commission). This decision was made to improve the quality and safety of services provided to NDIS participants.

Why the reforms are needed

Several major reviews have shown serious issues in the way NDIS services are being delivered, including risks to participants' safety and quality of care. These reviews include:

- the <u>Disability Royal Commission</u> found serious cases of abuse and neglect within the NDIS and called for stronger rules, especially in areas like personal care, accommodation, and support coordination;
- the <u>2023 Independent Review of the NDIS</u> found the registration process should be more consistent and should depend on the level of risk involved in the service – not just who is delivering it;
- the <u>Own Motion Inquiry</u> into support coordination and plan management found that while these services can be helpful, there have been complaints about poor quality, payment issues, and dishonest behaviour; and
- the <u>NDIS Provider and Worker Registration Taskforce</u> in 2024 said SIL and home and living supports are higher risk. They recommended providers of these supports be registered under the current registration system.

SIL participants are especially at risk of harm because group home settings can be isolating. The NDIS Taskforce noted that some providers have been found to target participants with large funding plans, then deliver poor quality services and abandon those participants once funding runs out.

There is also not enough oversight of Support Coordination. Several reviews, including the Tune Review, the Disability Royal Commission, and the NDIS Review, have shown how poor support coordination practices have led to harm, isolation, and poor-quality supports.

What is changing

Registration will become mandatory for:

- Platform Providers;
- Support Coordinators; and
- SIL providers.

Providers will be required to adhere to the NDIS Practice Standards Core Module, and Specialist Support Coordination Module where relevant.

These changes will be introduced gradually, to make sure providers and participants have time to adjust.

What the reforms aim to achieve

Mandatory registration aims to make NDIS services safer and more consistent. The main goals are:

- **Stronger safeguards**: All providers must meet minimum standards and are subject to regulatory oversight;
- Improved quality and consistency: There will be clearer expectations for provider competence. Providers will need to show they are capable and reliable; and
- **Greater transparency and accountability**: It will be clearer to see who is delivering services and how they are doing it.

The NDIS Commission will work closely with providers and others in the sector to make sure the process is fair, clear, and gives everyone enough time to adapt.

Consultation approach

To support the rollout of mandatory registration reforms, the NDIS Commission asked for public feedback in late 2024. We wanted to understand how best to implement the changes. We consulted utilising the following approaches:

- SIL and Support Coordination: We released a <u>public consultation paper</u> explaining the
 proposed changes to make registration mandatory for all SIL and Support Coordination
 providers. People were invited to give feedback by filling out an online survey or sending a
 written submission, which closed in March 2025; and
- Platform Providers: Separate consultations were held for these providers, including a
 consultation paper with the option to provide written submissions or respond to a survey, as
 well as a series of consultative forums held in early 2025. These results will be shared in a
 separate report.

Consultation questions can be found at Appendix A.

Who we heard from

We believe that good reforms need input from the people most affected.

Most survey responses came from providers who deliver SIL and/or Support Coordination. Some responses were submitted by NDIS participants and their supporters, including carers, guardians, and family members.

We received:

- 413 survey responses; and
- 34 written submissions.

The tables below provide more information about the 413 survey responses.

Table 1. Total number of respondents. Survey data.

Total number of respondents	
Participants and their supporters	85 (21%)
Providers	326 (79%)

Table 2. Participants and their supporters characteristics. Survey data.

Participants and their supporters characteristics	
Carer, guardian, or family member	61 (72%)
NDIS participant	24 (28%)

Table 3. Provider characteristics: Services provided. Survey data.

Provider characteristics: Services provided	
Support Coordination	267 (82%)
Supported Independent Living (SIL)	13 (4%)
Support Coordination and SIL	46 (14%)

Table 4. Provider characteristics: Registration status. Survey data.

Provider characteristics: Registration status	
Registered	121 (37%)
Unregistered	205 (63%)

Written responses

We received 34 written submissions including:

- 26 submissions from a range of people and organisations including:
 - community organisations and the disability sector;
 - providers and provider peak bodies;

- participants;
- auditors; and
- workforce and carer representative organisations.
- 8 direct emails that disagreed with the idea of mandatory registration. These emails did not respond to the consultation questions and are not included in the analysis.

Most providers who gave a written submission were registered, except for some sole traders.

Analysis approach

All comments from the survey and written submissions were carefully reviewed using a structured approach to analysis. You can read more about how this was done in <u>Appendix B</u>.

What we heard

Considerations for mandatory registration

Understanding the benefits of mandatory registration

Some people, especially providers and carers, guardians and family members of participants, supported the idea of making registration mandatory. They felt it would improve the overall safety and quality of the NDIS.

They understood that all providers, not just those who choose to register, would need to meet standards, be audited, and follow set rules.

Providers saw this as a way to fix current gaps in oversight.

Workforce groups strongly supported registration happening sooner rather than later.

"It will ensure all providers meet quality and safeguard requirements, so my son is safer."

- Supporter on behalf of a NDIS participant survey response

"[The changes provide] more accountability from fraudulent people."

- Supporter on behalf of an NDIS participant survey response

"Mandatory registration will address these issues by enforcing consistent compliance with robust standards, improving workforce capabilities, and fostering participant-centred outcomes. As outlined in your consultation paper, it is essential to align all providers to meet NDIS Practice Standards, ensuring no provider operates outside the regulatory framework."

- Peak body written submission

"Given the vulnerability of most participants who live in SIL services, as well as the extent of the financial commitment under the NDIS to these services, it is critically important that these services be delivered by quality, registered providers." - NDIS provider written submission

The need to maintain continuity of support arrangements

While many people supported change, they were also concerned about losing their current providers. Some providers, especially small businesses or sole traders, were worried they might not be able to afford the administrative costs of registration and doing audits. If these providers stop working, participants may lose their SIL or Support Coordination providers.

"There will be many providers that won't be able to afford registration which will result in participants losing their current, familiar and preferred provider/s and they will have to find new providers that they may not feel comfortable with."

- Supporter on behalf of an NDIS participant survey response

"I am now faced with having to find a new SC for my son who won't know my son, who more than likely hasn't got lived experience. My choice to find the person people best suited to support my son and offered guidance will be taken away as this SC is a mum to a complex child herself, she only has a small amount of clients and won't be able to afford registration so she's already said she will not be a SC any longer."

- Supporter on behalf of an NDIS participant survey response

"I worry my sole trader unregistered support coordinator will decide to leave the industry rather than register as it is an extra unpaid burden on them."

NDIS participant survey response

"[Our organisation] believes that market stability and the continuity of supports must be safeguarded to prevent disruptions, while capacity building and provider readiness will be essential to ensure compliance without compromising service availability."

- NDIS provider written submission

Participants said it often takes time and effort to find the right provider, especially for SIL or Support Coordination. Once these trusted relationships are in place, they can be an important support. Practically, they often also help to find health services and navigate systems. Any change that may put those relationships at risk needs to be carefully considered.

"After changing support coordinators several times and jumping through a ton of hoops, I have finally landed on one that really helps me, and I would prefer there not be a chance that I lose them. This support coordinator has been extremely thorough in making sure I get the help I need, and making sure every service I use is beneficial and helping me improve."

NDIS participant survey response

"[Our] members have expressed concerns about losing trusted providers who are either unwilling or unable to comply with registration requirements. The option to access providers that best suit an individual's budget and goals is crucial and life-changing."

Peak body written submission

The importance of maintaining choice and control

People said it is important that participants can still choose who supports them. Some were worried that mandatory registration might reduce the number of smaller or more personalised providers who deliver more tailored and consistent support, with lower risks of conflict of interest. This could limit options, especially for people with complex needs. People said that future changes should support a wide range of providers to maintain access to options that meet participant's individual needs.

Others said mandatory registration would actually strengthen choice, because participants will know that all providers are safe and accountable.

"NDIS participants deserve more autonomy and the ability to tailor their own support care, particularly with existing supports which would be majorly disruptive if this change were to take place."

- NDIS participant written response

"There are participants who are aging or nearing the end of their life that are happy and content with their current supports and they deserve the human right to live out the rest of their days with the support they choose."

- Supporter on behalf of an NDIS participant survey response

"Participants' ability to select providers may be further restricted if smaller, community-based providers cannot meet the new registration standards."

- NDIS provider written submission

"Concerns that mandatory registration will reduce participant choice are unfounded. Choice and control are only meaningful when participants have access to safe, transparent, and high-quality providers. A system that allows unregistered providers to continue operating without oversight does not enhance choice, it exposes participants to unnecessary risk."

- NDIS provider written submission

Minimising cost and administrative burden to support providers

Many providers, especially smaller ones, said the cost and administrative burden of registration and meeting the quality standard for registration is too high. Even though the audit process is meant to be proportionate to the size and scale of an organisation and the type of support provided, many said it may still be difficult for smaller providers to manage registration. There was a strong view that the registration requirements need to be flexible enough to support providers with varying capacities, experience, services offering and resources. Some suggestions included:

- flexible payment plans for auditing;
- more hands-on help with the process; and
- recognising existing professional memberships or training.

"For SC the cost - please consider the costs for SOLE TRADERS in comparison to COMPANIES. As a sole trader the costs are harder to manage than a company and this is one of the reasons I have not registered - I cannot afford the costs."

- NDIS provider survey response

"The cost for businesses should be able to be spread across periods of time."

NDIS provider survey response

"Clear guidelines and criteria should be communicated to ensure compliance and minimise confusion. It's important to offer training and resources to help smaller providers or those without formal qualifications meet the requirements."

NDIS provider survey response

"There are good reasons why many independent support coordinators choose not to register. Among these are the complicated process, very burdensome audits, and high monetary cost, all of

which are too onerous."

- NDIS provider written submission

Broader safeguarding and quality assurance beyond registration

There was strong support for mandatory registration, with many respondents seeing it as a valuable step toward strengthening the NDIS. Many people said that registration is just one part of improving quality and safety. They called for:

- outcome-based assessments;
- clearer qualification standards;
- consistent, high-quality auditing;
- · comprehensive quality frameworks; and
- better enforcement of the rules.

"In addition to registration, SIL providers should be required to uphold standards of quality, safety, human rights and supported decision-making in their services."— Peak body written submission

"Ensuring the quality (and consistency) of auditors who can complete registration reviews"" – NDIS provider survey response

Tailored strategies for First Nations and CALD communities

People said the registration process needs to work for First Nations and Culturally and Linguistically Diverse (CALD) communities. That includes:

making audits culturally safe;

- investing in the local workforce;
- adjusting timelines for remote service delivery; and
- co-designing solutions with local communities to ensure reforms are practical, respectful, and effective.

A number of submissions called for investment in cultural mapping¹ to ensure auditing processes meet community needs and are based on language, culture, law/lore and ethics.

"Rural and remote locations may end up with no or limited supports, access to technology can hinder registration and compliance especially in remote/rural First Nation locations, consider one off funding for registration transition. Diverse companies may not be able to meet requirements, but we need diverse providers delivering supports that are ethnically and culturally appropriate."

NDIS provider survey response

"[we recommend that] all SIL auditors are required to have cultural competency training and remote NT experience. [We also recommend the NDIS Commission] develop a 'cultural competency accreditation' for NDIS auditors to ensure they understand the realities of remote First Nations service delivery."

- Advocacy organisation written submission

"[Our organisation] also acknowledges the unique challenges faced by people in regional and remote communities, including First Nations peoples, when accessing services designed to meet their individual needs... the already fragile markets in these areas are at risk of being disproportionately impacted should smaller Supported Independent Living (SIL) providers and Support Coordination organisations exit the market. Such departures could exacerbate existing service gaps and hinder efforts to ensure equitable access for all."

- Peak body written submission

Considerations for regional and remote service delivery

Mandatory registration may be more difficult in regional and remote areas. Consultation found that regional and remote areas face systemic challenges that make mandatory registration particularly complex. Regional and remote areas are more likely to experience workforce shortages, limited access to professional development opportunities, higher operational costs, and reduced economies of scale that make compliance more challenging and expensive.

We heard that regional and remote services often rely on local knowledge, community connections and informal support networks that may not be easily replicated by larger, more distant providers. Providers stated that these local connections are crucial for effective service delivery and participant wellbeing.

¹ Cultural mapping is the process of Indigenous placemaking. Indigenous landscapes are alive with local stories, practices, relationships, memories, and rituals that constitute places as meaningful locations.

"My support coordinator's small rural business cannot afford the registration fee. We have been unable to find a registered coordinator in our remote location in past 2 years."

- NDIS provider written submission

Proposed transition arrangements

Responding to proposed transition timeframes

We asked providers and participants about what they might need to get ready for mandatory registration. We wanted to make sure changes are introduced gradually and thoughtfully.

During consultation, we sought feedback on appropriate timeframes. We proposed giving providers 3 months to register (from a future date) and 12 months to pass quality audit.

People had mixed views on whether the proposed transition timeframes are achievable. Some thought the timeframes were fair, while others were unsure or disagreed.

Common concerns included:

- cost, complexity and increased workload;
- not enough clear information; and
- limited resources.

"The suggested timeframes - 3 months for registration application and 12 months for audit completion - may be unrealistic for providers who need to overhaul their business practices, policies, and procedures to comply with the new requirements."

NDIS provider survey response

"I consider the timeframes are appropriate and the current approach extremely generous and supportive."

- NDIS provider survey submission

"The proposed 3-month application and 12-month audit timelines are unrealistic for providers in remote areas."

- NDIS provider written submission

Clarity and transparency about how participants will be impacted

People said clear and timely communication was essential to support a smooth transition. They noted that greater clarity will help both providers and participants feel more prepared and confident. In particular, we heard people wanted:

- more details about how the changes will be introduced;
- · detailed guidance; and
- clear timelines.

Clear communication from the NDIS Commission was viewed as key to avoiding confusion, supporting service continuity, and building trust during the transition.

"There is a significant lack of detail and transparency in the transition arrangements, which could lead to confusion and misinformation among participants."

- NDIS Participant written response

"There is not enough information out there to know the impact of these transition arrangements."

- Supporter on behalf of an NDIS participant survey response

Factoring in the cost of registration for a fair transition

Many people said the cost of audits should be considered when planning the transition. Respondents saw this as a valuable opportunity to ensure providers, particularly small businesses or sole traders, are well-supported to meet the new requirements. Many called for clear strategies to support the cost, such as guidance, templates and financial support or cost-reduction measures, to help maintain a diverse and sustainable provider market.

"The transition arrangements will not change the significant cost associated with providers becoming registered."

- Supporter on behalf of an NDIS participant survey response

"I agree with the registration, but make it affordable."

NDIS participant survey response

Setting timeframes for the transition

While some respondents felt that the transition arrangements would allow enough time for providers and participants to adjust to the changes, they emphasised the need for realistic and well-supported timelines. Some providers were unsure if the timeframes for the transition were enough as they do not fully understand what is involved to become registered and how long that usually takes. They also worried about the time taken in finding auditors and getting registration approved.

"I would rather a slower and clearer transition with an identified timeframe that reduces the impact to the workers and therefore quality of service we receive."

- Supporter on behalf of an NDIS participant survey response

"There is time for us to support our family member to seek a registered provider and will ensure the oversight that was lacking preciously."

- Supporter on behalf of an NDIS participant survey response

"We appreciate the introduction of a transition period, but providers will need clear and realistic timeframes to align operations with the new standards. Many organisations, particularly small and regional providers, may require extended implementation periods to ensure compliance without service disruptions."

- Peak body written submission

Some providers felt that the transition period should happen faster, particularly for SIL providers. This was because of the high-risk nature of SIL supports and the need to ensure measures are put in place so that participants accessing services are safeguarded from the risk of exploitation as soon as possible.

"Given the known issues and concerns about quality of care and risk of exploitation, and because these issues and the need to address them has been on the agenda since December 2023 (when the NDIS Review report was released), and flagged prior to this in the Disability Royal Commission Report in September 2023, the delay of action is already too late and a twelve month transition from implementation leaves too many people at risk."

- NDIS provider written submission

"[Our] organisation is concerned that the risk of extended timeframes needs to be managed at other organisation so to prevent unintended negative impacts on participants."

- Peak body written submission

Ensuring providers are well informed and prepared

Many people said more detail is needed to help providers get ready. They want:

- clear explanations of what is required;
- regular updates;
- consistent messages (to avoid confusion); and
- information about costs and how changes affect already registered providers.

There is an opportunity for us to strengthen understanding and confidence in the changes by providing timely, consistent updates. Some respondents also noted the need for us to be proactive in communication to reduce conflicting messages and ensure everyone receives accurate, up-to-date guidance to help plan for the changes effectively.

"Clearer communication is crucial to ensuring that all providers, regardless of size, can successfully meet the new requirements without disrupting services to NDIS participants."

- NDIS provider survey response

"It's hard to tell what is fact and what is rumour. Apart from a timeframe, what are the transition arrangements? How can I say how they will affect me if I have no idea what they are?"

- NDIS provider survey response

"The transition arrangements must include detailed, step-by-step guidance on compliance expectations."

NDIS provider written submission

Minimal impacts for already registered providers

Some providers said the changes would have little or no impact on them because they are already registered. Many of these providers supported the changes and want to see improvements in the sector.

"The proposed transition arrangements are expected to have minimal direct impact on the organisation as an existing registered provider of these services."

- NDIS provider written submission

"I am already registered and unsure if this brings any changes to my current registration."

NDIS provider survey response

Supports and information needed to prepare for implementation of mandatory registration

We know that mandatory registration of SIL and Support Coordination will affect how some participants and providers deliver or receive support. To help everyone prepare, we asked what kinds of information and support would be most helpful during this transition.

What participants told us

Participants and their supporters who responded to our survey said they need clear and accessible information to feel ready for the changes (see Table 5).

The most common support request was for clear, easy to understand guides explaining the registration process and what it means for participants. Many also wanted a timeline outlining key dates, along with information on how to provide feedback, updates from their current providers, and access to a dedicated helpline. Some respondents also mentioned webinars, case studies, and help with choosing between registered providers, while a smaller number said they did not need any additional support.

These findings will be considered in how we support people ensuring we provide accessible and practical resources to help participants navigate the changes.

Table 5. Information and supports that would help with transition arrangements for participants. Survey data

Information and support types	Percentage of survey respondents who selected each type*
Clear, easy-to-understand guides explaining the registration process and its impact on participants	66%
A timeline of the registration process and key dates for implementation	56%
Information on how to provide feedback or raise concerns during the transition period	49%
Regular updates from my current providers about their registration status and any potential changes to services	47%
A dedicated helpline to answer questions about the registration process and its implications	46%
Information sessions or webinars about the changes and how they might affect my supports	36%
Case studies or examples of how mandatory registration has affected participants in similar situations	31%
Assistance in understanding how to choose between registered providers	29%
I don't feel I need any additional support or information at this time	11%

^{*}Note: Respondents could select more than 1 support type

What providers told us

Providers who responded to the survey said they need clear, accessible guidance and consistent communication to get ready for mandatory registration (see Table 6).

The most common requests were for clear information on requirements and compliance, regular updates on the process and timelines, and dedicated channels to ask questions. Practical supports like templates, training, and workshops were also seen as helpful, though networking with other providers was a lower priority.

Table 6. Information and supports that would help with transition for providers. Survey data

Information and support types	Percentage of survey respondents who selected each type*
Clear guidance on registration requirements and compliance	79%
Regular updates on the registration process and timeline	70%
Dedicated support channels for questions and clarifications	67%
Access to templates and tools for policy development	64%
Training and workshops on meeting NDIS Practice Standards	58%
Networking opportunities with other providers going through registration	37%

^{*}Note: Respondents could select more than 1 support type

Many written responses from providers reflected the same desired supports and information that was outlined in the survey.

- "A dedicated liaison officer or task force to assist remote providers with navigating registration requirements and compliance processes."
- NDIS provider written submission
- "... establishing channels for participants, providers, and workers to provide feedback and ask questions about the changes, ensuring their concerns are heard and addressed."
- Peak body written submission
- "[The NDIS Commission should] establish regular consultation forums to assess the effectiveness of the transition approach."
- Peak body written submission

Workforce development and training

Providers said training will be important to lift service quality and meet NDIS Practice Standards. They asked for:

- help understanding the registration process;
- training to upskill staff; and
- workshops that suit different provider types (for example, large compared to small providers, metropolitan compared to rural and remote providers).

"Flexible and accessible training programs tailored to the unique challenges of delivering services in remote and culturally diverse contexts."

NDIS provider written submission

"Offer workforce development programs to upskill staff during the transition."

- NDIS provider written submission

Financial and administrative support

Costs and administrative requirements associated with registration were outlined by both participants and providers as key concerns with the changes.

Providers suggested:

- financial and/or administrative support;
- grants to help cover training and audit costs; and
- incentives to keep small and unregistered providers in the market.

"[Providers require] grant programs to offset training and audit costs, as well as incentives for providers to offer diverse programs aligned with participants' goals."

- NDIS provider written submission

"[Our organisation] acknowledges that the financial burden of registration may significantly impact some smaller providers and sole traders. A simple, low-cost registration process and clear cost modelling should be provided to assist participants and providers in planning and ensuring services are not disrupted."

Peak body written submission

The need for practice guidance and updated NDIS Practice Standards

Some providers stated they required guidance from the NDIS Commission to understand how to ensure their practices are compliant with the NDIS Practice Standards.

"The transition arrangements must include detailed, step-by-step guidance on compliance expectations."

NDIS provider written submission

Some providers also felt that the NDIS Practice Standards should be updated and modernised for the changing sector. They felt that these should be specific to the type of services that a provider delivers and consider the unique risks involved with each service type.

"The development of quality and practice frameworks specific to SIL is also crucial, as current standards do not sufficiently guide the delivery of high-quality, tailored supports.

Additionally, funding impacts must be considered, as the costs of registration."

- NDIS provider written submission

Recognising these concerns, in 2024, we consulted with over 800 stakeholders through online and in-person sessions across Australia, including:

- providers;
- workers;
- auditors;
- advocacy groups;
- industry representatives; and
- subject matter experts.

The consultation focused on:

- A review of the NDIS Practice Standards;
- Developing new Practice Standards specific to SIL; and
- Reviewing proposed options for the legal and practical separation of SIL and Specialist Disability Accommodation (SDA).

<u>Our Insights Report - Next Steps: Regulation for in-home and housing supports</u> reflects what we heard.

We are currently:

- undertaking a review the NDIS Practice Standards to improve the design and structure to enhance quality and competency expectations;
- developing a Quality Framework prototype with clear definitions and ways to measure quality; and
- developing new Practice Standards and Quality Indicators, specific to SIL in collaboration with people with disability.

Next steps

While most people support the goals of mandatory registration, which include improving safety and quality of service, there are some concerns about how the transition will work in practice. This is especially true for:

- providers who are not currently registered, and
- participants who currently get supports from unregistered providers.

The need for clear information on the new requirements

A key theme across the consultation was the need for clear information. While consultation on mandatory registration is occurring, there has not been information on the exact timing of the changes. This has led to many respondents feeling unclear on exactly what is required, when changes will come into effect, and how the new rules will affect them or the people they support. Providing straightforward, practical guidance, along with regular updates will be an important next step in helping people prepare. This includes ensuring that providers of all sizes, can access the right information at the right time.

Working with providers, participants and the NDIA to ensure continuity of supports

We heard that support to prepare for the changes needs to go beyond information. Many providers raised cost as a major barrier to registration, especially when it comes to audits and the preparation needed to meet Practice Standards.

Without support, some providers may not register, which could lead to disruptions in service continuity for participants. We are committed to working closely with the NDIA, advocacy organisations and community services to ensure continuity of support and implementation approaches that support overall participant outcomes. We will also consider how practical tools such as templates, training, and education can support providers to prepare for changes.

Many participants and their supporters spoke about the value of long-standing, trusted providers, particularly those offering tailored or culturally safe supports. If these providers are unregistered and they choose not to register and leave the sector, the impact on participants could be significant. While some people expressed concerns about changes or loss of current providers, we also heard from stakeholders that registration can enhance the availability and sustainability of quality supports. Supporting participants to exercise informed choice making when navigating any transitions if unregistered providers choose not to register, will be an important focus during the changes.

Transition timeframe considerations

People had different views on the proposed timeframes. Some said they are reasonable, others flagged concerns, especially participants and providers in rural and remote areas.

A flexible approach, where possible, that considers different provider contexts, including geographic, cultural and operational challenges, will be important to get this right.

Communicating clearly and consistently throughout the transition process

Participants, their supporters and providers shared that they all want ways to remain connected to the NDIS Commission during the rollout of the changes. People want ongoing opportunities to ask questions, raise concerns and provide feedback. Setting up regular check-ins, support channels, and clear pathways for communication will help us identify emerging issues early and adapt the rollout as needed.

Making changes to the NDIS Rules

To reflect mandatory registration reform, the NDIS Provider Registration Rules will also be updated. These new rules will:

- include transition arrangements;
- give legal certainty to providers; and
- support a staged transition for already registered Support Coordination and SIL providers.

Prior to the legislative changes, we will undertake market readiness activities, working closely with key stakeholders such as the NDIA to ensure the sector is provided with sufficient lead time for the commencement of the reforms.

Appendix A - Consultation topics

The questions posed during consultation informed both the coding framework and thematic structure. These included:

- For participants, carers, guardians, and/or family members.
 - » Do you think the proposed mandatory registration changes for SIL and Support Coordination will impact the ways you access and receive these supports?
 - » Do you think the proposed transition arrangements will help manage these impacts?
 - » What support or information would be helpful to assist you to prepare for these changes?
- For providers:
 - » Please tell us about your organisation's current registration status and supports delivered.
 - » Do you think the proposed transition arrangements will help your organisation to meet the proposed mandatory registration changes for SIL and/or Support Coordination?
 - » What other considerations should be taken into account when implementing mandatory registration for SIL and/or support coordination?
- » Are the proposed transition timeframes (3-month application and 12-month audit completion) achievable for your organisation? What would impact your ability to meet these timelines?
- » What support or information would be helpful to assist you to prepare for these changes?

Appendix B - Analysis approach

The analysis involved the following steps:

- Data preparation and familiarisation
 - All qualitative responses were compiled, cleaned, and reviewed to ensure completeness.
- We undertook a familiarisation process to understand the tone, content, and scope of feedback across different respondent groups.
- Coding and thematic analysis
 - Responses were coded using specialised qualitative analysis software, allowing for efficient organisation and interpretation of large volumes of textual data.
 - A combination of inductive coding (allowing themes to emerge naturally from the data)
 and deductive coding (based on pre-identified consultation topics) was applied.
- Organisation of insights
 - Insights were categorised under three overarching themes, which aligned with the structure of the consultation and reflected the most common areas of feedback:
 - » What we heard about the potential impacts of mandatory registration.
 - » What we heard about the proposed transition arrangements.
 - » What we heard about supports and information needed to prepare for implementation of mandatory registration.
 - These categories provided a clear framework for capturing the breadth of views across all respondent types.