Submission to the Joint Standing Committee on the National Disability Insurance Scheme

Inquiry into the Integrity of the National Disability Insurance Scheme

Submitted by: Self Manager Hub

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About Self Manager Hub

Self Manager Hub is a peer-led organisation that promotes and supports self-management and self-direction so that people with disability can lead the lives we choose. Our community includes NDIS participants and nominees who self-manage, use a plan manager, directly employ workers, engage independent workers, and use flexible and individualised arrangements to direct their own supports.

This submission draws on a survey of 40 community members connected to Self Manager Hub, conducted in April 2026. Respondents included 19 participants and 21 nominees.

Quotes in this submission are reproduced exactly as provided by respondents, including spelling and punctuation.

Executive summary

The strongest message from this survey is that self-management and self-direction are a critical part of the integrity solution.

The evidence gathered by Self Manager Hub suggests that:

- provider overcharging and unfair charging practices are common;
- claim rejections are often unclear and difficult to challenge;
- audits and payment reviews are frequently experienced as punitive, confusing, and procedurally unfair;
- many participants and nominees do not have access to clear, consistent, and easy to understand information about what NDIS funds can be used for;
- self-management and self-direction are essential to independence, dignity, safety, flexibility, and value for money;
- self-managers often detect inappropriate billing and prevent waste that may otherwise go unnoticed.

This survey points to a serious imbalance in current integrity settings. Too often, participants and families are carrying the burden of compliance, while also being exposed to provider overcharging, inconsistent decision-making, and integrity responses that feel disproportionate and inaccessible.

Self Manager Hub submits that reforms to strengthen scheme integrity have had serious negative impacts on participants and that significant work is required by the agency to improve procedural fairness, transparency of decision-making, and to protect self-management and self-direction.

Survey snapshot

The quantitative findings are set out below.

Survey question	Result
Respondents who said it is **extremely important** to be able to make their own decisions about how to spend NDIS funds	38 of 40, 95%
Respondents who said a person or provider had tried to charge them for something unfair or not disclosed	24 of 40, 60%
Respondents who said they had an NDIS claim rejected without a fair reason	15 of 40, 37.5%
Respondents who said they had been subjected to a difficult audit or payment review	16 of 40, 40%
Respondents who said the NDIA had questioned or removed their ability to self-manage or plan-manage without a fair reason	11 of 40, 27.5%
Respondents who said they had received clear and easy to understand information about what NDIS funds can be used for	13 of 40, 32.5%
Respondents who said they had **not** received clear and easy to understand information	22 of 40, 55%
Respondents who were unsure whether the information had been clear	5 of 40, 12.5%

These figures show that rigid integrity measures are adversely impacting participants and nominees trying to manage supports lawfully, responsibly, and in good faith.

Response to the terms of reference

1. The nature and extent of non-compliance, including fraud and sharp practices, in the NDIS

The survey suggests that one of the most visible integrity issues affecting people who self-manage or use plan management and self-direct their supports is provider sharp practice, especially overcharging, hidden charges, double charging, and charges that were not properly agreed to or disclosed.

60 per cent of respondents said a provider or individual had tried to charge them for something they did not think was fair or had not been told about.

Respondents described:

> *"A physiotherapist was charging the maximum NDIS rate in the pricing guide, while their standard rate was much lower. I informed them the ACCC did not allow this and insisted they charge me at the standard rate as I was paying upfront. They did so reluctantly."*

> *“Large provider allied health services) routinely overcharging/double charging us, requiring participant/nominee to constantly have to verify everything with a fine tooth comb and ask them to correct issues.”*
>
> *“We had started psychology for our son and the first bill was $270 when NDIS was paying $199 at the time. When I questioned they said that was the rate for NDIS participants. I paid it and cancelled all other appointments with them”*
>
> *“Every monthly invoice was wrong, charging for shifts that did not occur, putting credits against account from other participants.”*

These responses show that some of the clearest examples of non-compliance and unfair practice are occurring in provider billing and charging.

The survey also suggests that self-management is itself an important integrity safeguard because self-managers are actively checking invoices, comparing charges against services delivered, and disputing inappropriate claims.

One respondent stated:

> *“If it had been agency-managed, that error would not have been picked up! It is because I look at EVERY invoice before I pay.”*

This is a significant point for the Committee. Participants and nominees who self-manage are often preventing misuse of scheme funds by closely monitoring charges. Any integrity framework that weakens self-management risks weakening one of the most practical, real-world checks on inappropriate billing.

The survey also identified concerns about claims being wrongly rejected on the NDIS portal, or routine payment issues being escalated in ways that felt disproportionate and accusatory.

Respondents reported:

> *“It was just rejected on the portal - there is no explanation on the portal and no one to ask about it! I tried calling NDIS but the person over the phone said they are unable to see why claims get rejected. So, there is literally NO ONE to discuss a rejected claim with!”*
>
> *“An invoice was blurry! Rather than ask for it to be resubmitted the payment integrity team cancelled the claim all together and it took a manual claim, a complaint via our federal minister and 6 weeks to get it rectified.”*
>
> *“They have a 'reason', but it was incorrect.”*

These responses indicate that current integrity settings risk conflating genuine fraud with routine administrative problems, interpretation disputes, or system failures. That weakens confidence in the integrity system and creates harm for participants acting lawfully. For people with disability and families self-managing NDIS funding, having a claim incorrectly rejected means being out of pocket for that cost – which may be thousands of dollars. NDIA do not prioritise fixing incorrect integrity interventions against self-managers, so people with disability and families risk being forced to pay thousands they may not have or lose access to critical supports due to non-payment.

2. The impacts of non-compliance on NDIS participants and their families

The impacts described by respondents were serious and wide-ranging. They included:

- financial stress
- delayed reimbursement
- inability to pay workers on time
- fear of using plan funds
- reduced flexibility
- distress, anxiety, and loss of trust
- threats to continuity and safety of support arrangements
- reduced independence and quality of life

The survey makes clear that self-management, plan management, and self-direction are central to independence and wellbeing.

95 per cent of respondents said it was extremely important that they be able to make their own decisions about how to spend their NDIS funds.

Respondents said:

> *"The only way we have ANY support is because of the flexibility self-management provides to use independent workers we have selected (locally) and trained ourselves."*
>
> *"There is no independence when someone else makes decisions for you."*
>
> *"I want to be able to choose who I employ and the terms under which I employ them."*
>
> *"If they take away our ability to self-manage, we would most likely have to go to a provider and lose his current staff, we would have no guarantee of consistent staff, and no guarantee that the staff sent to him would be able to communicate with him, which would be a recipe for disaster, and most likely see him being heavily drugged to manage his behaviours of concern."*

These are powerful statements. They show that self-management and self-direction are not simply administrative preferences. For many participants and families, they are the only workable way to access secure safe, reliable, and individualised supports.

Respondents also described real harm arising from audits, payment reviews, and integrity responses.

40 per cent of respondents said they had been subjected to a difficult audit or payment review.

Respondents said:

> *"Terrifying. It's an intrusive process - almost like they're questioning your integrity and it's guilty until proven innocent. I don't like the attitude that people with disabilities are the reason the NDIS is in trouble! We are not the cause of the problems within the NDIS."*
>
> *"We are now too scared and concerned of NDIA/LAC actions and behaviour to effectively use plans or even contact the NDIA for anything, even simple advice or support, in case we are accused of doing something wrong"*
>
> *"They broke me."*
>
> *"We had to pay out of pocket till apparently simple problem fixed."*
>
> *"We had to fund wages ourselves Scared to book services in case NDIA doesn't repay."*

This evidence shows that current integrity processes can have harmful impacts on participants. Participants and families may become afraid to use their plans flexibly, even where the support is lawful and necessary, because they fear retrospective penalties, claim refusal, or threats to self-management.

That impacts on how the NDIS can deliver essential supports and choice and control for participants.

3. The effectiveness and adequacy of successive government policies to improve scheme integrity, safeguard participants, and tackle non-compliance

The survey evidence suggests that current integrity settings are not adequately balanced.

Respondents broadly supported the need for accountability and safeguards. However, many described the system as lacking clear rules, procedural fairness, and accessible communication.

Only 13 of 40 respondents, 32.5 per cent, said they had received clear and easy to understand information about what their NDIS funds can be used for. By contrast, 27 respondents, 67.5 per cent, said they had not received clear information or were unsure.

Respondents described this clearly:

> *“There is conflicting information between the support lists, the price guides and support catalogue.”*
>
> *“Information is constantly changing, ridiculously long, contradictory and confusing, and seeking clarity or asking questions or for assistance with this from NDIA/partners is a horrific experience EVERY time.”*
>
> *“The only way I know about the October 2024 changes is because of online groups and forums. The NDIS communication is appalling.”*
>
> *“There should have been a training module from the get-go when your funding is approved. Constant changes to the funding do & don't is confusing & a pain to keep on top of, especially when NDIS is not very good at disseminating information”*

This suggests that current information remains too inconsistent, too inaccessible, and too difficult to apply confidently in real life.

The survey also raises concerns about procedural fairness when the NDIA questions self-management.

11 respondents said the NDIA had questioned or taken away their ability to self-manage or plan-manage without a fair reason.

Respondents described being accused of fraud, subjected to unexplained restrictions, or threatened with loss of self-management:

> *“Questioned my ability. Was accused of fraud in relation to claiming superannuation guarantee as per the ATO regulations. Was told it was still fraud even after I explained I had sought the advice of the NDIS (in a SMH workshop), the ATO and a superannuation accountant!”*
>
> *“We received a new plan that suddenly had transport agency managed so we couldn’t even pay for a taxi.”*
>
> *“The auditor then stated "If you can't manage it we can make you NDIA managed." I said that sounded like a threat”*

> *"Written information stated that I could resubmit the claim but there was a risk of having self management removed for repeated non compliant claims."*

Taken together, these responses indicate that current integrity approaches are often being experienced as coercive, opaque, and poorly tailored. In our view, this undermines participant confidence, is harmful and must be addressed.

4. Legislative or other reforms required to strengthen scheme integrity

Self Manager Hub submits that reforms should strengthen integrity without undermining self-management and self-direction.

Based on the survey evidence, we recommend the following.

1. Protect self-management and self-direction from arbitrary removal

The NDIA should not remove or restrict self-management or plan management without:

- clear written reasons
- disclosure of the evidence relied on
- an opportunity for the participant or nominee to respond
- reasonable timeframes to provide information
- access to review rights.

2. Make claim rejections transparent, reviewable, and easy to resolve

Participants and nominees should receive a clear written explanation whenever a claim is rejected, delayed, or held. They should be able to speak with a decision-maker who can explain the reason and correct mistakes quickly.

3. Focus integrity efforts more strongly on provider sharp practices

The Committee should recognise provider overcharging, double charging, hidden fees, and poor invoicing as major integrity issues. Compliance settings should not focus on participants while provider billing problems remain widespread.

4. Recognise self-management and self-direction as part of the integrity solution

Self-managers frequently identify overcharging and inappropriate billing before public funds are spent. Policy settings should acknowledge that self-management can strengthen scheme integrity by increasing scrutiny and accountability of providers.

5. Improve the clarity, consistency, and accessibility of guidance

Rules about what NDIS funds can and cannot be used for should be simpler, clearer, and applied and communicated consistently across the NDIA, planners, partners, call centres, payment integrity teams, and plan managers. Guidance must also be accessible and responsive to the realities of self-management, direct employment, and individual circumstances.

6. Make audits and payment reviews proportionate and trauma-informed

Audits and payment reviews should be procedurally fair, use reasonable timeframes, accessible communication, plain language, and a genuine opportunity to respond. Minor administrative errors should be expected from time to time and treated fairly and in a supportive and educative way.

7. Ensure integrity processes do not place participants at risk

Where payment delays affect worker wages, continuity of support, or participant safety, urgent escalation processes should be available.

8. Co-design integrity reforms with people who self-manage and self-direct their supports

Participants and nominees with lived experience of self-management and self-direction should be directly involved in shaping future integrity reforms. They are often best placed to identify real risks, practical safeguards, and the unintended consequences of poorly designed compliance systems.

Conclusion

This submission highlights a clear message from our community.

Self-management and self-direction are a critical part of the integrity solution. They help participants and nominees detect overcharging, monitor value for money, and build safe and effective supports. At the same time, many respondents described integrity systems that were confusing, punitive, and distressing.

The Committee should ensure that reforms to improve integrity do not shift power away from people with disability and our families or punish those who are acting in good faith. A stronger integrity framework must target provider non-compliance and sharp practices, while improving procedural fairness for participants and protecting the central NDIS principles of choice and control.