
ACTA Submission to the New Framework Planning and NDIS Supports Consultation

Submission Date: October 2026

For enquiries, contact Murray Coates or Daniel Urrutia at:
info@communitytransportaustralia.org.au



ACTA

Australian Community Transport Association

About ACTA

The Australian Community Transport Association (ACTA) is the national peak body representing community transport providers across Australia. Established in 2011, ACTA unites organisations from every state and territory, QLD, NSW, TAS, SA, VIC, ACT, NT, and WA; giving the sector a strong, coordinated national voice. As a not-for-profit company limited by guarantee, ACTA is dedicated to advancing equitable, sustainable, and accessible community transport services nationwide.

ACTA has a proven track record of leading large-scale, complex sector reform and cutting-edge projects. As the key architect behind the development and national trial of the National Community Transport Pricing Model (NCTPM), delivered in partnership with the Department of Health, Disability and Ageing, the University of South Australia – UniSA (As of now, the University of Adelaide), and 31 pilot organisations, ACTA has demonstrated capability in sector-wide engagement, governance, and system change.

Summary of Recommendations

R1	ACTA recommends expanding the PECQ to explicitly assess participants' transport access, travel frequency, right of choice, and social participation needs. A multidimensional assessment must recognise transport as an essential enabler of physical and mental wellbeing, independence and community inclusion, ensuring these supports are appropriately assessed and funded.
R2	ACTA recommends incorporating average and median distance into transport needs assessments and NDIS pricing arrangements. The Department should draw on the National Community Transport Pricing Model (NCTPM) to establish an evidence-based pricing approach that reflects actual delivery costs, prevents inappropriate funding caps and safeguards equitable access to community transport.
R3	ACTA recommends that the Department publish accessible budget calculation guidance, practical examples and clear funding rules, including specific provisions for community transport. Participants must be able to understand how their transport funding is calculated, what services are covered and how provider charges are determined, supporting informed choice, financial transparency and equitable access.
R4	ACTA recommends that the Department explicitly include community transport within NDIS Support Category 13 and replace rigid fortnightly funding allocations with flexible, needs-based arrangements. Funding must reflect actual travel time, distance, frequency and individual support requirements, with mechanisms to accommodate changing needs and safeguard participants' access to healthcare, employment and social participation.

ACTA thanks the Department of Health, Disability and Ageing for the opportunity to respond to the consultation on New Framework Planning and NDIS Supports.

Drawing on feedback from ACTA members across all states and territories, this submission reflects the community transport sector's collective views, concerns and recommendations. The following responses highlight the critical issues and practical considerations ACTA encourages the Department to take into account when further refining and co-designing the new framework.

Support needs assessment rules

- **What parts of the support needs assessment process need more explanation?**

ACTA acknowledges the comprehensive four-part needs assessment framework, comprising the Core Needs Assessment, Personal and Environmental Circumstances Questionnaire (PECQ), Targeted Assessments and Assessed Categories of NDIS Supports.

However, ACTA is concerned that the PECQ does not adequately capture participants' social participation, right of choice, and broader mobility needs. While it considers household arrangements, it overlooks access to transport, vehicle availability, frequency of travel and participation in community activities, including social groups, outings and gatherings.

Transport is essential to maintaining independence, social connection and wellbeing. It enables participants to attend medical appointments, access allied health and therapeutic services, participate in employment, education and community activities, and maintain social relationships. Failing to assess these needs risks underestimating the support participants require to access essential services, maintain their health and wellbeing, and remain active and connected within their communities.

Recommendation 1 – Embed transport and social participation needs into the PECQ

ACTA recommends expanding the PECQ to explicitly assess participants' transport access, travel frequency, personal preferences and social participation needs. A multidimensional functional assessment must recognise transport as an essential enabler of physical and mental wellbeing, independence and community inclusion, ensuring these supports are appropriately assessed and funded.

-
- **What questions and feedback do you have about the draft template support needs assessment report?**

ACTA recommends further developing the transport section of the draft Support Needs Assessment Report by capturing the average and median travel time and distance required to meet participants' needs.

These measures are essential to aligning participant funding with the actual cost of transport delivery. Community transport providers calculate costs based on travel distance and functional individual support requirements. Without these considerations, funding arrangements risk imposing unrealistic per-trip caps, undermining service viability and limiting participants' access to essential transport.

The assessment must also inform NDIS pricing arrangements to ensure funding reflects the true cost of service delivery, particularly in regional, rural and remote communities.

Recommendation 2 – Align transport assessments, funding and pricing with actual delivery costs

ACTA recommends incorporating average and median distance into transport needs assessments and NDIS pricing arrangements. The Department should draw on the National Community Transport Pricing Model (NCTPM) to establish an evidence-based pricing approach that reflects actual delivery costs, prevents inappropriate funding caps and safeguards equitable access to community transport.

- **In what circumstances do you think a replacement assessment should be arranged? Are there additional circumstances that should be considered?**

No comment.

Budget method rules

- **Further information and details about the budget method calculations will be provided later in 2026 after more testing is done. What information would help participants understand how a budget is calculated?**

ACTA calls for clear, accessible and transparent budget calculations that enable participants, families, carers and providers to understand how funding is determined and applied.

To support this, ACTA members recommend the Department provide:

- Simple explanations of budget and pricing calculations, including how individual support needs influence funding.
- Accessible resources in plain English, translated languages, Auslan and alternative communication formats.
- Practical examples illustrating how participant budgets and transport costs are calculated.
- Clear guidance on inclusions and exclusions, outlining what supports can and cannot be funded.

Implementing the National Community Transport Pricing Model (NCTPM) would provide an independent, evidence-based pricing framework, improve transparency and help prevent excessive provider charges.

Importantly, community transport requires consistent policy definitions and transparent pricing rules. Participants must be able to understand their transport funding allocations, plan their travel needs and verify provider charges against their available funding.

Recommendation 3 – Make NDIS budget calculations transparent, accessible and consistent

ACTA recommends that the Department publish accessible budget calculation guidance, practical examples and clear funding rules, including specific provisions for community transport. Participants must be able to understand how their transport funding is calculated, what services are covered and how provider charges are determined, supporting informed choice, financial transparency and equitable access.

- **What questions and feedback to you have about the draft participant plan template?**

No comment.

Plan variation and reassessment rules

- **What feedback and questions do you have about plan variations and reassessments?**

No comment.

NDIS supports rules

- **What feedback do you have about changes to NDIS supports for old and new framework planning?**

ACTA welcomes the Department's efforts to simplify NDIS support categories and clarify stated and flexible funding arrangements. However, ACTA is concerned that Category 13 – Private Vehicle Transport does not adequately recognise the role of community transport or reflect the principles of the National Disability Insurance Scheme Act 2013, particularly the right of people with disability to participate fully in society and realise their physical, social, emotional and intellectual potential.

The proposed category overlooks the broader role of community transport in enabling access to healthcare, employment, education and social participation. ACTA considers that community transport should be explicitly recognised within this support category, with funding arrangements that reflect its distinct service characteristics.

Importantly, transport needs are not fixed. A standard fortnightly payment fails to account for fluctuations in travel frequency, distance and individual support requirements. Participants may require additional transport during periods of increased healthcare needs, employment commitments or social engagement. Restrictive funding arrangements risk forcing participants to choose between essential services and community participation.

ACTA advocates for a needs-based funding approach that considers average and median travel distance, frequency and individual circumstances, with sufficient flexibility to respond to changing needs over time.

Recommendation 4 – Recognise community transport and introduce flexible, needs-based transport funding

ACTA recommends that the Department explicitly include community transport within NDIS Support Category 13 and replace rigid fortnightly funding allocations with flexible, needs-based arrangements. Funding must reflect actual time required to support participants during the trip, trip distance, frequency and individual support requirements, with mechanisms to accommodate changing needs and safeguard participants' access to healthcare, employment and social participation.

What impacts do you think will be experienced as a result of removing replacement supports? What items or services will no longer be available?

No comment.