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National Disability
Insurance Agency

NDIS Quarterly report to disability ministers

31 March 2023



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Introduction

Key highlights for Quarter 3, 2023–24

Crackdown on fraud

In February 2024 the Federal Government announced the \$83.9 million Crack Down on Fraud program. The program will further support the work of the multi-agency Fraud Fusion Taskforce (FFT).

The FFT works to safeguard the Scheme's integrity by enhancing the systems in place to detect and prevent fraud and non-compliant activity. The Crack Down on Fraud program will optimise National Disability Insurance Scheme (NDIS) resources and ensure that honest participants who depend on the Scheme are better supported into the future.

Key highlights for Quarter 3, 2023–24

Participant outcomes

Improvements in outcomes for choice and control continue to highlight the difference the NDIS is making for participants, families and carers.

- **41%** of participants aged 15 years and older who have been in the Scheme for 2 years or more reported increased participation in community and social activities – a relative increase of **19%**
- Participation in work has more than doubled from **10%** at baseline to **22%** at latest reassessment for participants aged 15 to 24 years who have been in the Scheme for 2 years or more
- For participants who have been in the Scheme for 2 years or more, there has been a 5 percentage point increase in parents and carers reporting paid employment, from **46%** at baseline to **51%** at latest reassessment, slightly above the 2023–24 target of 50%
- More than three-quarters of all participants aged 15 years and older who have been in the Scheme for 2 years or more reported the NDIS has helped them to have greater choice and control in their lives. There has been a 10 percentage point increase, from **67%** at entry to the Scheme to **77%** at reassessment, exceeding the 2023–24 target of **75%**.

Key highlights for Quarter 3, 2023–24

Growing a diverse workforce

The Agency is continuing work to enhance the inclusion, diversity and engagement of our workforce.

In January, the NDIA established the Office of Agency Accessibility and Inclusion, which is dedicated to driving a culture of accessibility and inclusion within the NDIA. The Office will improve the accessibility of Agency systems, processes and supports for staff to continue building a more inclusive culture.

To enhance inclusion and to meet growing demand, the National Contact Centre (NCC) also continues to expand its workforce, adding 149 roles in the quarter across internal and outsourced operations. The insourced NCC again exceeded disability workforce inclusion targets with 43% of operational staff identifying as having disability, and 55% as having lived experience of disability.

The NDIA has also appointed Adjunct Professor Janine Mohamed as NDIS DCEO First Nations. Janine is a proud Narungga Kurna woman from South Australia, based on Wurundjeri Country. Janine will lead work on improving access and outcomes for First Nations people with disability.

These changes demonstrate our strong commitment to better support both staff and participants by ensuring the NDIA workforce embraces culture and diversity. This will help us reflect the communities we serve and create a more inclusive and welcoming Agency for participants.

Scheme financial experience

Scheme financial experience is monitored against expectations outlined in the 2022–23 Annual Financial Sustainability Report (AFSR). The AFSR was published by the NDIA in December 2023.

While growth has started to stabilise, payments for participant supports and participant numbers have continued to increase and are above June 2023 projections in the 2022–23 AFSR.

Total Scheme expenses for the 9 months to 31 March 2024 were \$30.9 billion (on an accrual basis). This result is a relative improvement of 0.2% compared to the last quarter, at which time payments were higher than budgeted by 1.9%. The main drivers of this difference are:

- **Number of participants** – the total number of Scheme participants at 31 March 2024 was **649,623**, which included 277,427 participants aged between 0 and 14 years. Of participants aged between 0 and 14 years, 96,012 had developmental delay and 136,209 had autism. Participants aged between 0 and 14 years represented 43% of Scheme participants.
- **Average payment per participant** – the average payment per participant for the 9 months to March 2024 was lower than the previous quarter, down to **1.8%** higher than expectations, an improvement from 2.1% in the December 2023 quarter.

The NDIA continues to examine available data to understand the key risks to financial sustainability of the Scheme. They include:

- Plan inflation decreasing, with an annualised rate in the quarter to 31 March 2024 down to 7.5%, the lowest rate since September 2021. This continues a downward trend observed since September 2022
- A positive shift in spending behaviours, with a 14% reduction in participants at risk of overspending.

The NDIA is optimistic the NDIS is on track to reach National Cabinet's agreed annual growth target of 8% by 1 July 2026, with changes in legislative and policy settings arising from NDIS Review recommendations anticipated to lead to moderation in NDIS growth.

Resolving participant requests

Since late 2023, the NDIA has received a larger than average volume of requests from participants asking for a change to their NDIS plan.

The National Disability Insurance Agency (NDIA) is experiencing higher than usual volumes of calls, emails, and in-person support requests from participants, leading to some delays. To address this, the NDIA is:

- Establishing a dedicated team to prioritise urgent plan reviews based on participant risk factors
- Recruiting more planners and NCC staff to meet the increasing demand
- Increasing the number of staff supporting participant escalations
- Making enhancements to our computer system to improve efficiencies and participants' experience
- Improving communications with plan managers and support coordinators about the important roles they play in supporting participants to use their NDIS supports appropriately.

Participants can continue to use their plan funding flexibly and are encouraged to work with their early childhood partner or local area coordinator if requiring help. Importantly, participant plans will continue irrespective of any delays in contact.

Participant safety is our number one priority and carefully reviewing participant requests for changes to their plan includes looking at any integrity risks. The NDIA will continue to work with the disability community and support participants to help manage risks such as providers misusing plan funds, using plan funds too quickly, and lack of supporting evidence.

Key areas of improvement

Reform for Outcomes, Disability Royal Commission and NDIS Review.

The NDIS continues to be life-changing for thousands of Australians, but we know that, for others, it is not working as well as it could and should be.

The NDIA recognises genuine change is needed to ensure the NDIS works for all people with disability. That's why we're working hard to make the NDIS stronger, but it will take time to get it right.

There are several reform efforts underway, including those pending Federal Government direction and decision, namely the \$732.9 million commitment in the 2023-24 Federal Budget to Reform for Outcomes initiatives.

The NDIA's work will also respond to recommendations and outcomes from the:

- Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability
- NDIS Review and National Disability Insurance Scheme Amendment (Getting the NDIS Back on Track No. 1) Bill 2024.

Key areas of improvement

Many of the ideas about how to make the NDIS stronger have come from the disability community.

Following engagement with the disability community, the NDIA has established and is delivering a co-design program across key initiatives to improve outcomes for participants including:

1. Participant pathway
2. Assessment and budgeting
3. Supporting children on the NDIS
4. Navigator function
5. Participant services
6. Psychosocial disability
7. Home and living
8. Integrity
9. Workforce capability and culture
10. Participant safety.

Key areas of improvement

Reform for Outcomes update

In the 2023–24 Federal Budget, the Government committed \$732.9 million to improving outcomes for participants and ensuring the effectiveness and sustainability of the Scheme for future generations. The Agency has been progressively establishing this program of work in collaboration with people with disability and the disability community.

Independent living: Improve the consistency of Supported Independent Living (SIL) decisions

This participant centric initiative aims to support consistent, equitable and quality home and living decisions that are aligned with the best interests of participants and their families. The NDIA is improving the way we assess applications for home and living funding as well as how we communicate with participants requesting independent living supports in their review or planning meeting. Most home and living applications are now reviewed as part of a Complex Assessment Meeting that incorporates a specialist home and living delegate. The NDIA has observed a stabilisation in the number of participants new to SIL over the past 12 months, reducing by more than 30%.

Better planning: Plan over-utilisation

The NDIA has implemented a proactive contact model with participants who are at risk of overspending their plans, where we work with participants to ensure their spending remains on track and to reduce the risk of plan exhaustion. This has resulted in a positive shift in spending behaviours, with a 14% reduction in the number of participants at risk of overspending their plan.

Early investment: Plan reassessments

The Agency has seen an increased number of participants transition from the NDIS. This is in part from work aimed to identify those who have benefited from early investment NDIS supports through plan reassessment. Figures show the number of participants aged 7–14 (mostly with developmental delay) transitioning from the Scheme has increased from less than 3% per annum 12 months ago to an average of more than 6% per annum over past 2 months.

Key areas of improvement

Co-design

Co-design working groups continue to meet and progress short term priorities including plan flexibility, plan management resources, home and living, workforce capability, and fraud and compliance.

The NDIA is engaging the Disability Representative and Carer Organisations forum and Independent Advisory Council on future co-design topics and activities for the second half of this year.

Strengthening our commitment to the success of co-design initiatives, evaluation of previously prioritised co-design projects (CALD, participant safety, supported decision making, home and living, information gathering for access and planning, First Nations strategy) will also commence shortly.

The Co-design Advisory Group will be working with an independent partner to evaluate NDIA co-design processes over the coming months. Along with evaluation we will also be expanding our co-design work to include the outcomes of the NDIS Review and the changes proposed in the NDIS legislation.

Minister for the NDIS the Hon. Bill Shorten MP introduced NDIS legislation to Parliament on 27 March 2024. This legislation will create the building blocks needed to start making the NDIS stronger.

The NDIA will ensure the implementation of any legislative change passed by Parliament is guided by the disability community, including the considered development of supporting rules.

The NDIA is keenly focused on humanising the NDIS for a better participant experience and ensuring the Scheme is there for the future. The NDIA will continue to listen and work with the disability community and take the time needed to ensure the changes made are the right ones and will transition to new arrangements in a careful and considered way over time.

Key areas of improvement

Fraud and integrity

The NDIA continues to make significant strides in the detection and prevention of fraud and non-compliance. Our ability to do this has been enhanced by the continued work with the multi-agency Fraud Fusion Taskforce (FFT) and investment made by the Federal Government to the Crack Down on Fraud program.

This investment enabled a significant uplift in systems and capabilities. As a result, the NDIA has already implemented an initial 5 capability uplifts:

1. Piloting of myGov for the mobile app
2. Implementation of stronger payment scrutiny for all outbound payments
3. Monitoring of claims against expired plans to protect participant safety
4. Increased pre-payment checks on cash reimbursements
5. A campaign focused on participants that are unable to be contacted.

The NDIA continues to build on its targeted compliance activity by regularly monitoring and responding to incorrect or unusual claims made by providers. The NDIA has continued working with providers to raise awareness of their responsibilities and to educate them on how to be compliant when claiming.

The Crack Down on Fraud program will result in an increase in activity over the coming quarter, as hundreds of providers are either stopped from claiming, banned by the NDIS Commission or prosecuted.

The NDIA is working hard to make sure NDIS participants and providers find it easier to get it right and harder to get it wrong.

Section 1:

Participants and their plans



1

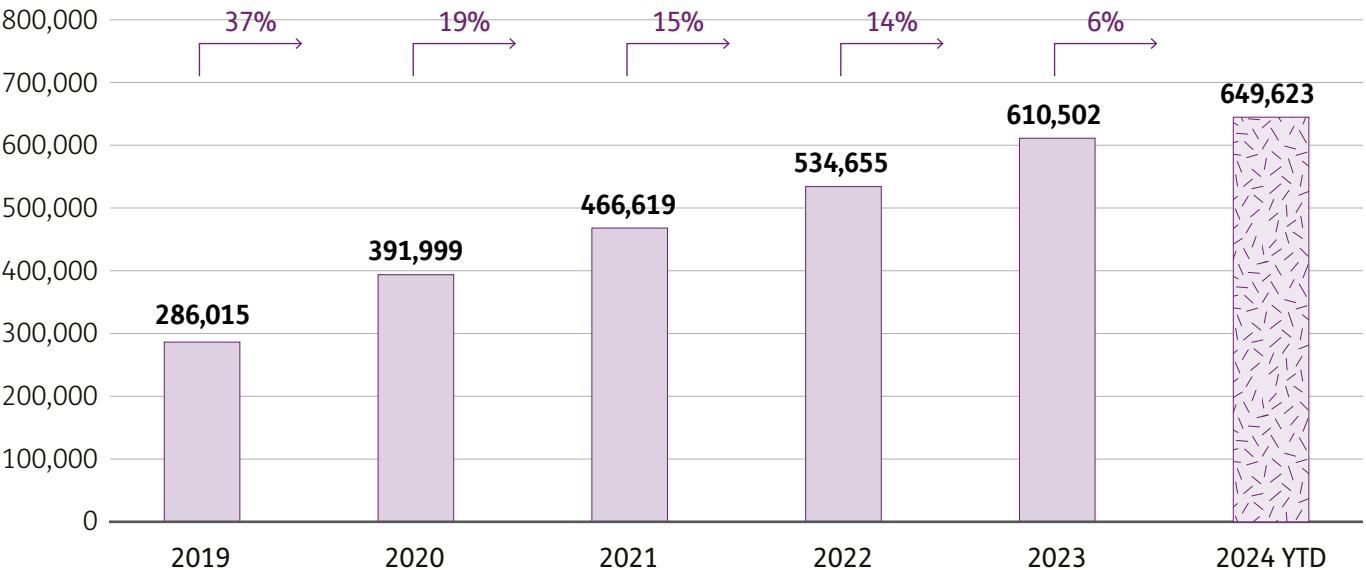
1.1 Number of participants in the Scheme



More than 649,000 participants are receiving support from the NDIS.

At March 2023, **649,623** participants had approved plans.¹ This represents a 0.5% net increase from last quarter (a net increase of 3,174 participants since December). The quarterly increase is lower than recent quarters due to processing volumes being temporarily impacted by adaptation to the new computer system.

Active participants with approved plans and percentage increase over time for years ending 30 June²



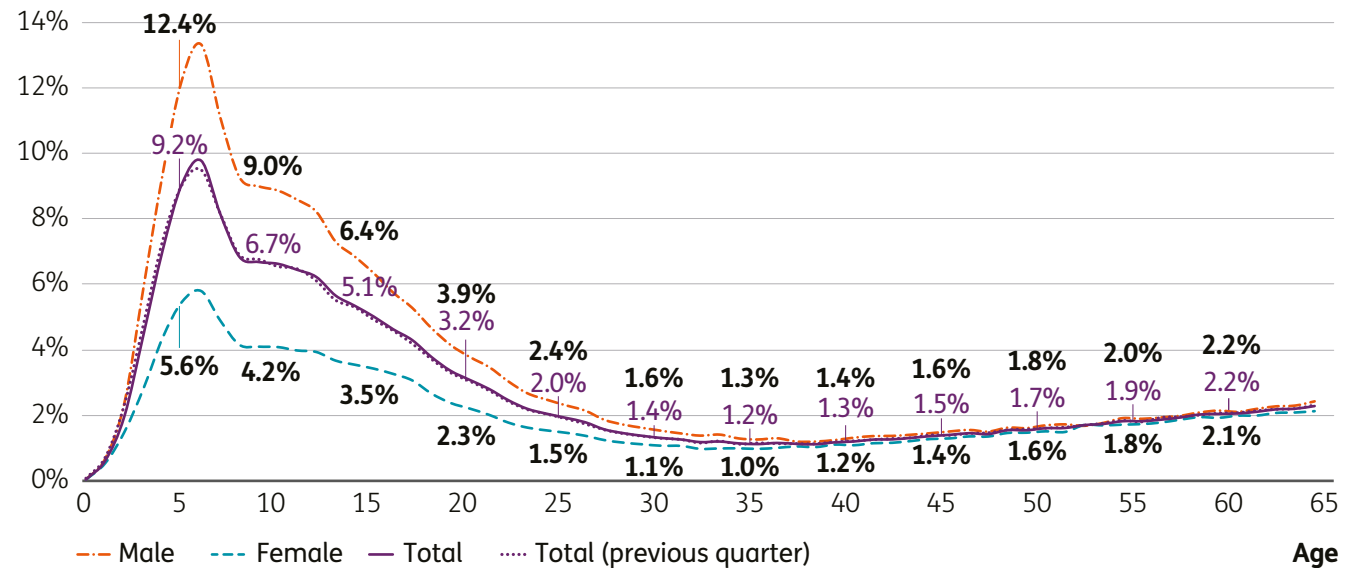
¹ 51,689 participants with approved plans have left the NDIS in the period between 1 July 2013 and 31 March 2024.
² This is the net increase in the number of active participants in the NDIS each period noting some participants have left the NDIS.

1.2 Participation rates

The number of NDIS participants as a proportion of the Australian population peaks between the ages of 5 and 7, with approximately 12% of 5 to 7 year-old males and 6% of 5 to 7 year-old females being NDIS participants.

- NDIS participation rate varies by age and gender.
- Peaks at roughly 10% between the ages of 5 and 7, declines to around 1% by age 35, and rises to 2% by age 56.
- Over half of all NDIS participants are aged 18 or under.
- Participation rates for males and females differ considerably at younger ages.
- This difference is largely due to the higher prevalence of autism and developmental delay in males.
- Participation rates up to age 4 have slightly decreased from the last quarter, while rates for ages 5 and above have remained similar, with a slight increase at age 6.

Participation rates³



³ There were 9,622 participants aged 0 to 64 years with a gender of "Other" at 31 March 2024. The participation rates for this group are included within the total rates.

1.3 Participant characteristics

The NDIA continues to monitor the number of participants entering the NDIS who identify as First Nations Peoples, Culturally and Linguistically Diverse (CALD), and participants who are from remote and very remote areas.

Of the **7,905** participants entering and receiving a plan in the quarter:

- **11.6%** were **First Nations peoples**⁴
- **7.4%** were **CALD**⁵
- **2.1%** were from **remote and very remote areas**⁶

The NDIA has co-designed a new CALD strategy and action plan for 2024-28, that was released at the end of April 2024.⁷

The NDIA is committed to co-design a new First Nations Strategy. Since December 2023, the NDIA has established a First Nations group that will lead the NDIA's work to improve access and outcomes for First Nations people with disability.

The total proportion of First Nations participants in the Scheme has increased slightly to 7.9% from 7.8% last quarter.

The NDIA continues to focus on current and new initiatives to support First Nations Peoples and remote participants understand, access, navigate, and utilise the Scheme. Exploration is underway to test alternative commissioning approaches to help address thin markets and improve access to supports in remote areas. To build on the NDIA's work to date, a Deputy CEO First Nations has been appointed and a First Nations Branch has been established to lead the NDIA's work to improve access and outcomes for First Nations participants. CALD and remote participation are similar to that observed in previous reports.

⁴ This compares to 8% of the Australian population identifying as First Nations Peoples who have a need for assistance. Source: Census of Population and Housing 2021 ("Need for Assistance" variable), Persons Place of Usual Residence, by Indigenous Status.

⁵ The percentage of CALD participants excludes participants who identify as First Nations Peoples. Further, the NDIA published extra analysis on CALD participants in the September 2021 quarterly report (<https://www.ndis.gov.au/about-us/publications/quarterly-reports>). The analysis indicated that it is likely that CALD participants are joining the NDIS but have not been identified as CALD in the data collected, rather than a large number of CALD people with a disability not currently being in the NDIS. With the introduction of the new computer system, the opportunity to collect improved data on participants should allow better identification of CALD participants.

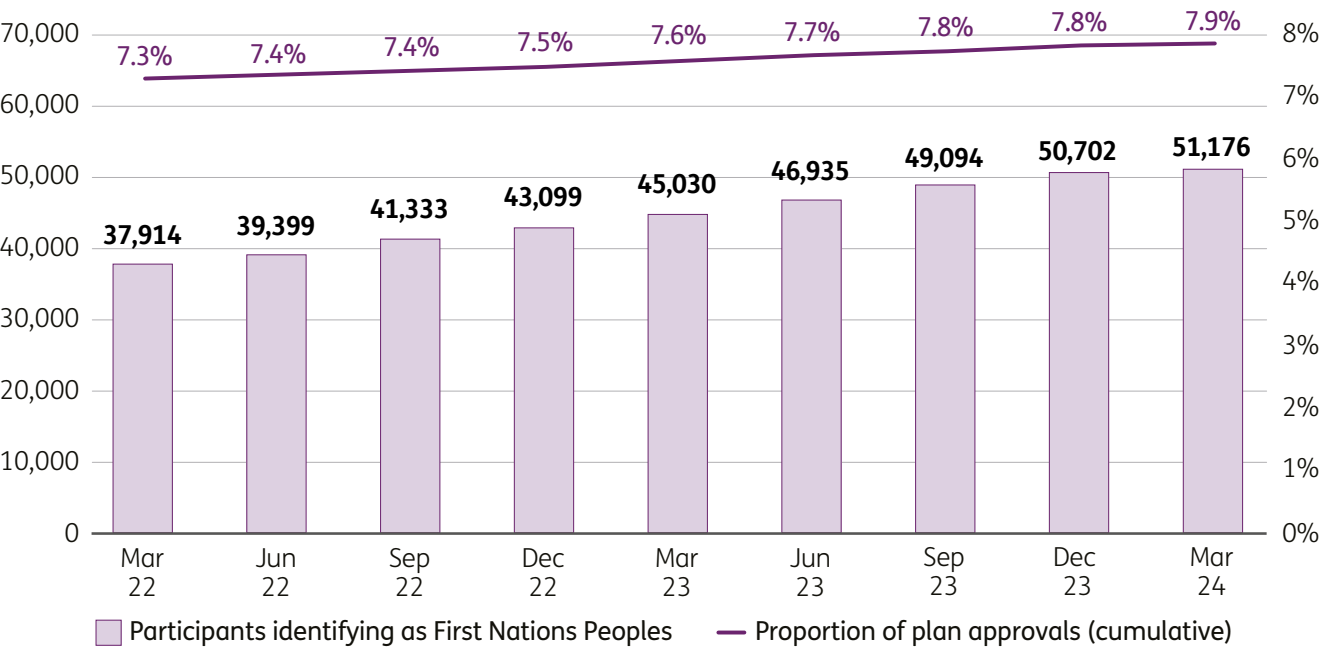
⁶ This compares to 2% of the Australian population living in remote or very remote areas. Source: Census of Population and Housing 2021, Persons Place of Usual Residence, by Remoteness Area.

⁷ Further information on these strategies can be found here: <https://www.ndis.gov.au/about-us/strategies/first-nations-strategy> and <https://www.ndis.gov.au/about-us/strategies/cultural-and-linguistic-diversity-strategy>



1.3 Participant characteristics

Cumulative number and proportion of First Nations⁸



⁸ <https://data.ndis.gov.au/explore-data> has detail on numbers of CALD participants and remote and very remote participants.

Section 2:

Participant and family/carer outcomes



2

2.1 Participation in work and community and social activities^{9,10}

Participation rates in community and social activities have increased, while the overall rate of participation in work is stable.

Participation in community and social activities

Participants who have been in the Scheme for at least 2 years have seen their community and social participation increase, since they first entered. Specifically, comparing responses at the most recent plan reassessment (between 2 and 7 years after entry) with responses at Scheme entry¹¹:

- **Six** percentage point increase from **33%** to **39%** for participants aged 15 to 24 years
- **Nine** percentage point increase from **35%** to **44%** for participants aged 25 to 34 years
- **Seven** percentage point increase from **35%** to **43%** for participants aged 35 to 44 years
- **Six** percentage point increase from **35%** to **41%** for participants aged 45 to 54 years
- **Five** percentage point increase from **35%** to **40%** for participants aged 55 to 64 years
- **Six** percentage point increase from **36%** to **42%** for participants aged 65 years and older
- **Seven percentage point increase from 35% to 41% for participants aged 15 years and older.**

The overall result of 41% compares to a 2023–24 target of 46%. In general, the increase in participation in community and social activities has improved the longer participants have been in the Scheme.

⁹ This section compares baseline indicator results when participants entered the Scheme, with results measured at the most recent participant plan reassessment for each respondent. Trial participants are excluded.

¹⁰ The participant age reported in this section is as per their latest plan reassessment.

¹¹ Figures have been rounded to the nearest whole percentage; differences are calculated from unrounded metrics.

2.1 Participation in work and community and social activities

Participation in work

The percentage in a paid job for those in the Scheme for at least 2 years continues to be relatively stable overall. However, the percentage in a paid job and the change by number of years in the Scheme differs by age group. For instance, the largest percentage increase was for participants in the 15 to 24 age group, consistent with participants entering the workforce for the first time. The percentage in a paid job remains stable or declines for all other age bands. Specifically, comparing responses at the most recent plan reassessment (between 2 to 7 years after entry) with responses at Scheme entry¹²:

- **Eleven** percentage point increase from **10%** to **22%** for participants aged 15 to 24 years¹³
- **Two** percentage point increase from **27%** to **29%** for participants aged 25 to 34 years
- **One** percentage point decrease from **28%** to **27%** for participants aged 35 to 44 years
- **Two** percentage point decrease from **25%** to **23%** for participants aged 45 to 54 years
- **Four** percentage point decrease from **19%** to **15%** for participants aged 55 to 64 years¹⁴
- **Five** percentage point decrease from **13%** to **8%** for participants aged 65 years and older¹⁵
- **Two percentage point increase from 21% to 23% for participants aged 15–64 years.**

¹² Figures have been rounded to the nearest whole percentage; differences are calculated from unrounded metrics.

¹³ Some of the increase is due to participants leaving school and starting work. As the Scheme matures it will be possible to analyse the extent to which the percentage gap increases.

¹⁴ Some of the decrease for older age groups is due to participants retiring from the workforce.

¹⁵ Ibid.

2.2 Perceptions of whether the NDIS has helped

Participants have positive perceptions across most domains and different age groups. However, the percentage of positive responses varies by domain and age group.

At each plan reassessment, participants are asked whether the NDIS has helped with areas related to each domain. For these questions, longitudinal change is measured from first plan reassessment, since the Scheme has not had an opportunity to help at baseline. Results shown in this section compare responses provided at the first plan reassessment with those from later reassessments, for participants entering the Scheme since 1 July 2016 and who have been in the Scheme for at least 2 years.

These questions have been updated from October 2023, to allow more meaningful analysis of participant and family/carer perceptions.

2.2 Perceptions of whether the NDIS has helped

Participant choice and control

The choice and control metric for participants aged 15 and over is based on the question “Has the NDIS helped you have more choices and more control over your life?”.

Positive perceptions of whether the NDIS has helped with choice and control have increased for the latest reassessment compared to the first reassessment across all age bands. Older participants tend to have higher levels of satisfaction than the 15 to 24 age group. Specifically, the percentage who think that the NDIS has helped them have more choices and more control over their life showed¹⁶:

- **Nine** percentage point increase from **61%** to **70%** for participants aged 15 to 24 years
- **Eleven** percentage point increase from **66%** to **77%** for participants aged 25 to 34 years
- **Ten** percentage point increase from **69%** to **79%** for participants aged 35 to 44 years
- **Ten** percentage point increase from **70%** to **80%** for participants aged 45 to 54 years
- **Ten** percentage point increase from **71%** to **81%** for participants aged 55 to 64 years
- **Twelve** percentage point increase from **71%** to **83%** for participants aged 65 years and older
- **Ten percentage point increase from 67% to 77% for participants aged 15 years and older.**

The overall result of 77% of participants aged 15 years or older with positive perceptions of whether the NDIS has helped with choice and control compares to a 2023–24 target of 75%.

¹⁶ Figures have been rounded to the nearer whole percentage; differences are calculated from unrounded metrics.



2.2 Perceptions of whether the NDIS has helped

Other “Has the NDIS helped?” questions

For children aged from birth to before starting school, results have improved across all domains. The figure below shows the percentages responding positively at first assessment and at latest reassessment, as well as the change between the 2 time points.

“Has the NDIS helped?” – participants aged from birth to before starting school¹⁷

Domain	First assessment %	Latest reassessment %	Percentage point change
Daily living: child’s development	91	94	+3
Daily living: access to specialist services	92	95	+3
Choice and control (child’s ability to communicate what they want)	83	87	+4
Relationships (fitting into family life)	77	83	+6
Social, community and civic participation (fitting into community life)	63	70	+7

Improvements were slightly stronger for fitting into family and community life (although results for these domains started off at a lower level and hence had more scope to improve).

For children aged from starting school to age 14, results are generally less positive than for the younger age group but show stronger improvement over time.

¹⁷ Figures have been rounded to the nearer whole percentage; differences are calculated from unrounded metrics.



2.2 Perceptions of whether the NDIS has helped

The figure below shows the percentages responding positively at first assessment and at latest reassessment, as well as the change between the 2 time points.

“Has the NDIS helped?” – participants aged from starting school to age 14¹⁸

Domain	First assessment %	Latest reassessment %	Percentage point change
Daily living (independence)	62	74	+12
Lifelong learning (access to education)	42	52	+10
Relationships (with family and friends)	51	61	+10
Social, community and civic participation (social and recreational life)	46	54	+8

18 Figures have been rounded to the nearer whole percentage; differences are calculated from unrounded metrics.

2.2 Perceptions of whether the NDIS has helped

For young adults aged 15 to 24 years, Figure below shows the percentages responding positively at first assessment and at latest reassessment, as well as the change between the 2 time points.

“Has the NDIS helped?” – participants aged 15 to 24¹⁹

Domain	First assessment %	Latest reassessment %	Percentage point change
Choice and control	61	71	+9
Daily living	61	72	+12
Relationships	50	55	+5
Home	23	22	–1
Health and wellbeing	44	51	+8
Lifelong learning	36	38	+2
Work	18	18	0
Social, community and civic participation	55	63	+8

The largest improvement over time in the Scheme has been observed for the daily living domain (+12 percentage point increase). Strong improvements have also been observed for choice and control (+9), relationships (+5), health and wellbeing (+8) and social, community and civic participation (+8). Lifelong learning showed a marginal increase (+2), and there was a slight decline for home while there was no material change for work.

¹⁹ Figures have been rounded to the nearer whole percentage; differences are calculated from unrounded metrics.



2.2 Perceptions of whether the NDIS has helped

For participants aged 25 years and over, perceptions tend to be more positive than for those aged 15 to 24, and the older adult group also shows a stronger improvement over time. Figure below shows the percentages responding positively at first assessment and latest reassessment, as well as the change between the 2 time point.

“Has the NDIS helped?” – participants aged 25 and over²⁰

Domain	First assessment %	Latest reassessment %	Percentage point change
Choice and control	69	80	+11
Daily living	73	84	+12
Relationships	53	63	+10
Home	31	36	+5
Health and wellbeing	52	62	+10
Lifelong learning	30	33	+3
Work	19	20	0
Social, community and civic participation	60	70	+11

From the figure on the left, the largest improvements over time in the Scheme have been observed for daily living (+12), choice and control (+11), relationships (+10), health and wellbeing (+10), and social, community and civic participation (+11). By contrast with the younger adult group, there was an improvement for the home domain (+5) for the older adult group.

Similar to the younger adult group, lifelong learning showed a marginal increase (+3) and there was no material change for work.²¹

Results continue to improve with time in Scheme

Responses tend to become more positive the longer a participant has been in the Scheme.

While these results are encouraging, the analysis also indicates there are areas where outcomes could be improved. For example, for participants aged 25 and over, after at least 2 years in the Scheme, only 20% agreed that being in the NDIS had helped them find a suitable job, almost unchanged from their first plan reassessment.

²⁰ Figures have been rounded to the nearer whole percentage; differences are calculated from unrounded metrics.
²¹ Noting that the education and housing systems have a major role to play in the lifelong learning and home domains.

Section 3:

Participant experience



3

3.1 Participant Service Guarantee²²

The PSG sets clear timeframes for key NDIS processes.

In the March 2024 quarter, performance against the range of PSG measures has been impacted by the adaptation to the new computer system and processes, as well as the significantly higher than average number of participants seeking a review of their NDIS plans. Performance was measured for 10 PSGs, with one meeting the PSG timeframes. It is acknowledged that PSG performance is not meeting the guarantee across the areas of Access, First Plans, Plan Reassessments and Reviewable Decisions. The NDIA has implemented a remediation plan to address the timeframes and improve the participant experience and PSG performance measures.

The plan includes increasing the number of planners and NCC staff; triaging urgent plan reviews and participant escalations; prioritising first plans, unscheduled reassessments and targeted scheduled reassessments. The plan also aims to increase the number of staff performing these activities and ensures that staff productivity continues to grow as they become more proficient with the new system.

²² <https://www.ndis.gov.au/about-us/policies/service-charter>

3.1 Participant Service Guarantee

PSG	Service type	Description of the service being guaranteed	Service Guarantee	Performance in the March 2024 quarter ²³
2	Access	Make an access decision, or request for more information, after an access request has been received	21 days	49%
4	Access	Make an access decision, or request for additional information, after more information has been provided.	14 days	53%
6	Planning	Approve a participant's plan, after an access decision has been made (excludes those Early Childhood Approach that have received initial supports)	56 days	55%
7	Planning	Approve a plan for ECA participants, after an access decision has been made	90 days	98%
8	Implementation	Offer to hold a plan implementation meeting, after the plan is approved.	7 days	80%
11	Plan reassessment ²⁴	Commence facilitating a scheduled plan reassessment, prior to the scheduled reassessment date	56 days	65%
12	Plan reassessment ²⁵	Decide whether to undertake a Participant Requested Plan reassessment, after the request is received	21 days	21%
13	Plan reassessment ²⁶	Complete a reassessment, after the decision to accept the request was made	28 days	63%
14	Plan variations	Amend a plan, after the receipt of information that triggers the plan amendment process	28 days	63%
17	Reviewable decisions	Complete an internal Review of a Reviewable Decision, after a request is received	60 days	20%

²³ For the March 2024 quarter, performance is measured from available data on processes and dates on the new computer system. Milestones being built into the new computer system will improve the capture of performance data.

²⁴ Excludes reassessments initiated prior to migrating service processes to the new computer system.

²⁵ Ibid.

²⁶ Ibid.

3.2 Hospital discharge

The NDIA is continuing to focus on the safe and timely discharge of NDIS participants from hospital.

The NDIA is working with the Commonwealth, State and Territory governments on a continued commitment to improving the safe and timely discharge of NDIS participants from hospital. In the March 2024 quarter:

- The NDIA target of contacting NDIS participants within 4 days of the NDIA being notified of a participant's admission was achieved for **78%** of participants in the March 2024 quarter, an improvement from **75%** in the December 2023 quarter.
- The average number of days between a NDIS participant being medically ready for discharge and being discharged was **21 days** in the March 2024 quarter, consistent with the December 2023 quarter. Overall, the discharge of participants has improved over the last 12 months, from **30 days** in the March 2023 quarter.

3.3 Complaints, Review Requests and AAT Cases

The NDIA is seeing a decrease in the number of RoRD cases as well as the number of Administrative Appeals Tribunal (AAT) cases, while the number of complaints are higher compared to previous quarters.

Complaints^{27,28,29,30}

Complaints may be lodged by participants or their representatives, or by others including members of the public, other government agencies or community organisations.

The NDIA maintains a service standard under which it aims to resolve 90% of complaints within 21 days after they are received. In the last 3 quarters, the Agency has experienced higher than usual levels of contact from participants, which has resulted in increased volumes of complaints.

In February 2024 the NDIA released a new NDIS Enquiries, Feedback and Complaints Policy that aims to:

- Provide a feedback process that is easy to understand and follow
- Help address issues that are raised with the NDIA sooner and better
- Support people to feel safe to share their experiences with the NDIA
- Listen and respond to those who share their feedback to improve the delivery of the NDIS.

²⁷ In the 'My Customer Requests' tile launched in October 2019, it is possible to record multiple related parties as the source of a complaint and in some cases both participants and providers or other parties are linked to a single case. Previously, the single source was often recorded as a participant regardless of whether a provider was associated with the complaint.

²⁸ The numbers of complaints reported for the most recent quarter may still increase to the extent there is a lag in data collection.

²⁹ Numbers may change as complaints reporting in the new computer system is refined including identifying complaints lodged via multiple channels.

³⁰ The historical number of complaints reported prior to the June 2023 QRDM has changed due to Participant Critical Incidents being reported separately from the June 2023 QRDM onwards, see later in the section for further details.

3.3 Complaints, Review Requests and AAT Cases

Participant complaints as a proportion of active participants averaged 5.9% over the 2 quarters to June 2022, then improved to 4.7% by the December 2022 quarter. The participant complaint rate then increased each quarter from June 2023 to December 2023, and increased further to 11.0% in the March 2024 quarter, with complaints lodged by representatives increasing more so than complaints directly from the participants. While the trend of increasing participant complaints may continue in the short term, the national rollout of the new computer system, and continuous improvement of processes, will improve services and help to reduce complaints in future periods.

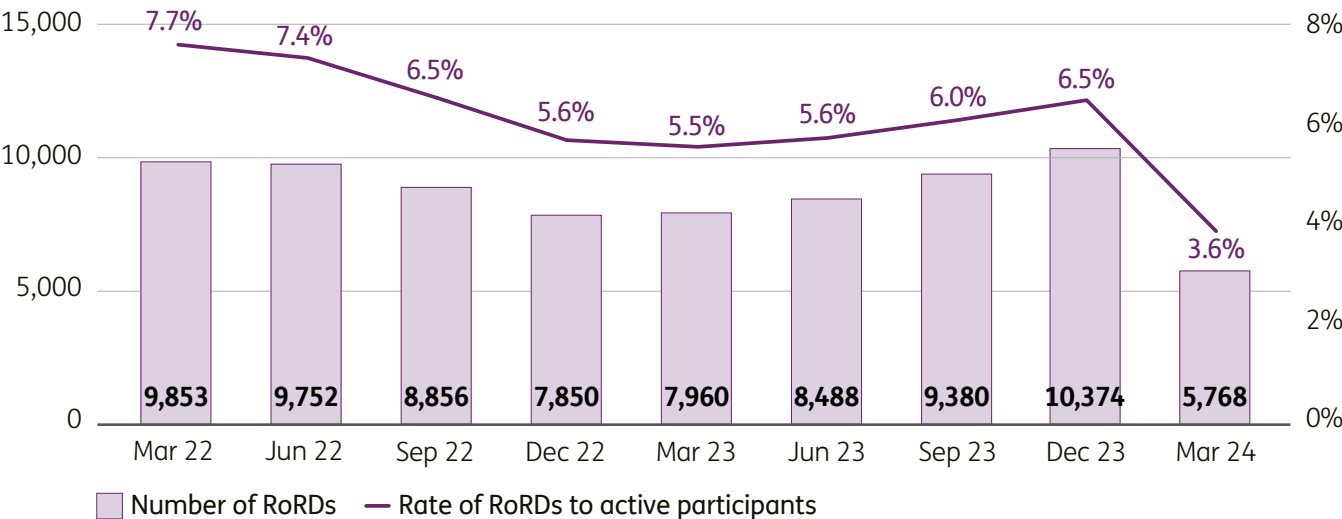
848 complaints were received from providers over the quarter, which is equivalent to 7.7% of registered providers making a complaint and is an increase on previous quarters. A further 482 complaints were received from other sources in the March 2024 quarter.

3.3 Complaints, Review Requests and AAT Cases

Review of a Reviewable Decision (RoRD)

The number of RoRDs as a percentage of active participants has decreased from 7.7% in the March 2022 quarter to 3.6% in the March 2024 quarter. The number of RoRDs for decisions in the December 2023 quarter is higher than reported at 31 December 2023, and the number of RoRDs for the March 2024 is low; the retrospective change and the low count for March are attributed to adaptation to the new computer system and processes, and the number of RoRDs for the March 2024 quarter are expected to increase.

Requests for a RoRD by date of decision



3.3 Complaints, Review Requests and AAT Cases

Administrative Appeals Tribunal (AAT)

If a person is not satisfied with the outcome of their review, they may apply to the AAT for review of a decision made by a reviewer. The NDIA is committed to acting as a model litigant in the AAT as required by the Legal Services Directions 2017. In doing so, the NDIA works with applicants and their legal representatives to resolve their matters as early as possible in the AAT process.^{31,32}

There were 681 new AAT cases in the March 2024 quarter, relating to 680 participants. The number of new AAT cases (as a proportion of active participants) has decreased since the March 2022 peak of 1.21% to 0.42% in the March 2024 quarter.

The decrease was due, in part, to:

- The early assessment initiative with the implementation of a case manager-led and participant-focused approach to dispute resolution of AAT matters
- Expanding internal legal capability to manage more AAT cases in-house, ensuring participants have direct engagement with an internal lawyer, where possible
- The Independent Expert Review trial, which was one of the alternative dispute resolution initiatives introduced to reduce the AAT case backlog and improve dispute resolution processes.

Since June 2022, these initiatives have contributed to the resolution of 8,825 AAT cases.

³¹ As part of the AAT process, it is not uncommon for new requests to be made and for new evidence to be provided by applicants while their matters are in progress. This contributes to NDIS decisions being varied in the AAT.

³² Further information about the AAT process can be found on the AAT website: <https://www.aat.gov.au/apply-for-a-review/national-disability-insurance-scheme-ndis/can-we-help>

3.4 The NDIS National Contact Centre

The NCC provides personal and high-quality services and information about the NDIA for people with disability, their family and carers, and service providers.

In the March 2024 quarter, the NCC experienced a substantial increase in volume of calls. 416,415 calls were offered this quarter, which is a 43.5% increase year on year and 27.3% increase since prior quarter. The NCC continued to answer all calls without using call blocking. The average speed of answer increased to 7 minutes and 20 seconds. This included the wait time for callers who chose to use the NCC's virtual hold feature, which offers an automatic call back when a Service Officer is available. A continued focus on quality of service and the use of technology such as virtual hold sustained customer satisfaction at 89%.

Other contact types including email and webchat also saw increased demand leading to an overall workload increase of 26.8% year on year which was 14.7% above forecast expectations.

The higher call workloads reflected increased requests for reviews of participant plans, which grew year on year from 15% to 32%. Requests from providers for increased funding for participants has been a growing trend.

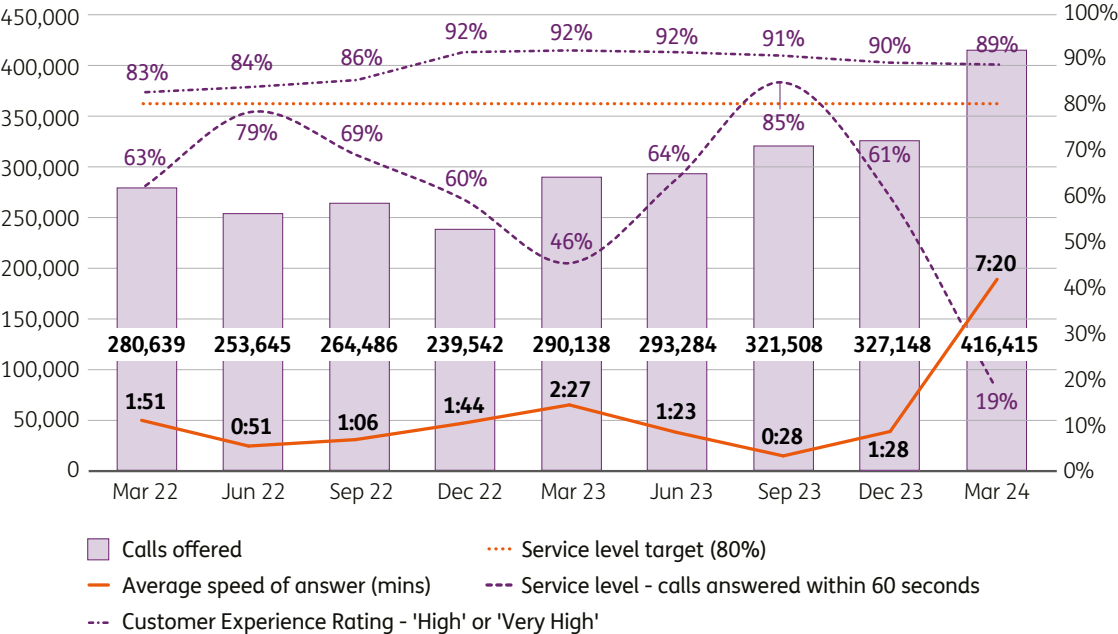
The NCC has introduced new scripting to guide callers on evidence for plan reviews, increasing call complexity and handle time by 14% year on year in Q3. To meet growing demand, 149 roles were added this quarter across internal and outsourced operations. The NCC continues to exceed disability workforce inclusion targets with 43% of staff identifying as having a disability and 55% having lived experience of disability.

The NCC has delivered the following results for the quarter:

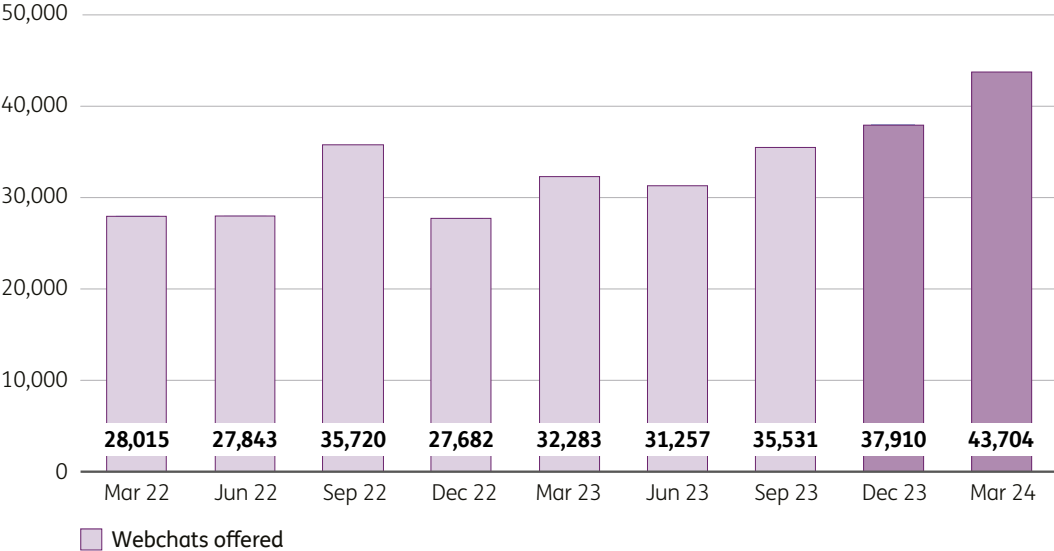
- Customer experience remained strong, with **89.4%** of post call survey respondents scoring their experience with the NCC as 'High' or 'Very High'
- **416,415** calls were offered, a 27.3% increase from previous quarter and a 43.5% increase year on year, exceeding forecast by 25.3%
- **43,704** webchats were offered, a 15.3% increase from previous quarter and a 35.4% increase year on year, exceeding forecast by 25%
- **248,679** emails were received in Q3, an increase of 2.2% year on year and 38% of emails were responded to in 2 business days.

3.4 The NDIS National Contact Centre

Telephony grade of service, average speed of answer, call volume and customer experience results



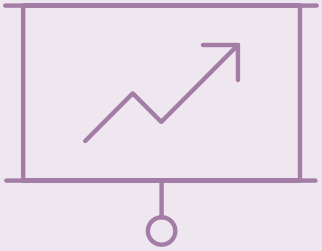
Webchats offered volume³³



³³ From Q2 2023–24, the volume of webchats offered have been estimated as a result of reporting issues with the Agency's new webchat functionality that was implemented in November 2023. The Agency has identified instances where a webchat was offered but not connected to a contactor or no contact was received from the requestor. These instances were removed to estimate the webchat volume.

Section 4:

Providers and the growing market



4

4.1 Support categories



The provider market continues to grow.

The largest support categories are Core support for daily activities, Core support for social and community participation, and Capacity Building for daily activities.

\$39.5bn billion in support has been provided in the 12 months to 31 March 2024.³⁴ The largest support categories are Core daily activities (52% of total payments), Core social and community participation (23% of total payments), and Capacity Building daily activities (13% of total payments). Core daily activities includes participants in SIL. \$10.2 billion of the \$20.5 billion payments on core daily activities in the 12 months to 31 March 2024 was for payments related to participants in SIL.

Total payments from 1 April 2023 to 31 March 2024

Support category	Total payments (in \$m)	% of total payments
Core – daily activities	20,482	51.8%
Core – social and community participation	9,028	22.8%
Core – consumables & transport	1,484	3.8%
Capacity Building – daily activities ³⁵	4,981	12.6%
Capacity Building – other	2,526	6.4%
Capital	1,015	2.6%
Total³⁶	39,524	100.0%

³¹ This represents total payments on a cash basis (including payments made under in-kind arrangements). On an accrual basis, total payments were \$40.5 billion.

³² Includes therapy services.

³³ Total includes \$8 million of payments with no support category.

4.2 Plan management types

The majority of participants are choosing to use a plan manager.

Participants indicate their preferred plan management type. As this decision is made at the “support category” level, a participant may end up opting for a combination of plan management types.

In the March 2024 quarter, a minority (9%) chose to have their plan entirely managed by the Agency, while the majority (63%³⁷), prefer to engage a plan manager for some or all of their plan. It was reported that 29% of participants plan to self-manage all or part of their plan. The NDIA continues to support participants in deciding whether self-management is right for them and have recently released an updated guide³⁸ to self-management. The guide explains the benefits of self-management, roles and responsibilities and how to self-manage effectively.

The indication of intended use of plan management type(s) at the planning stage is not binding, and therefore may differ from the plan management type(s) that is ultimately used. The following section reports on the actual plan management type(s) used.

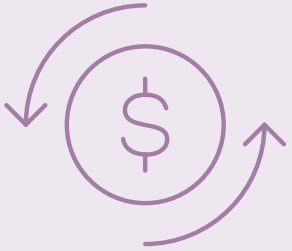
Active providers and payments by plan management type in the March 2024 quarter

Plan management type	Payments ³⁹ made to active providers (\$b), and proportion of total payments	Number of active providers ⁴⁰
Agency-managed	3.3 (33%)	8,786
Plan-managed	5.7 (56%)	183,147
Self-managed	1.1 (11%)	51,857
Total	10.1	205,367

37 This figure excludes participants that have opted to have part of their plan self-managed.
38 <https://www.ndis.gov.au/participants/using-your-plan/self-management#guide-to-self-management>
39 Includes cash and in-kind payments.
40 Active providers refer to those who have received payment in the quarter for supporting NDIS participants. The count of active providers excludes providers with an invalid Australian Business Number (ABN).

Section 5:

Financial sustainability



5

5.1 Total payments



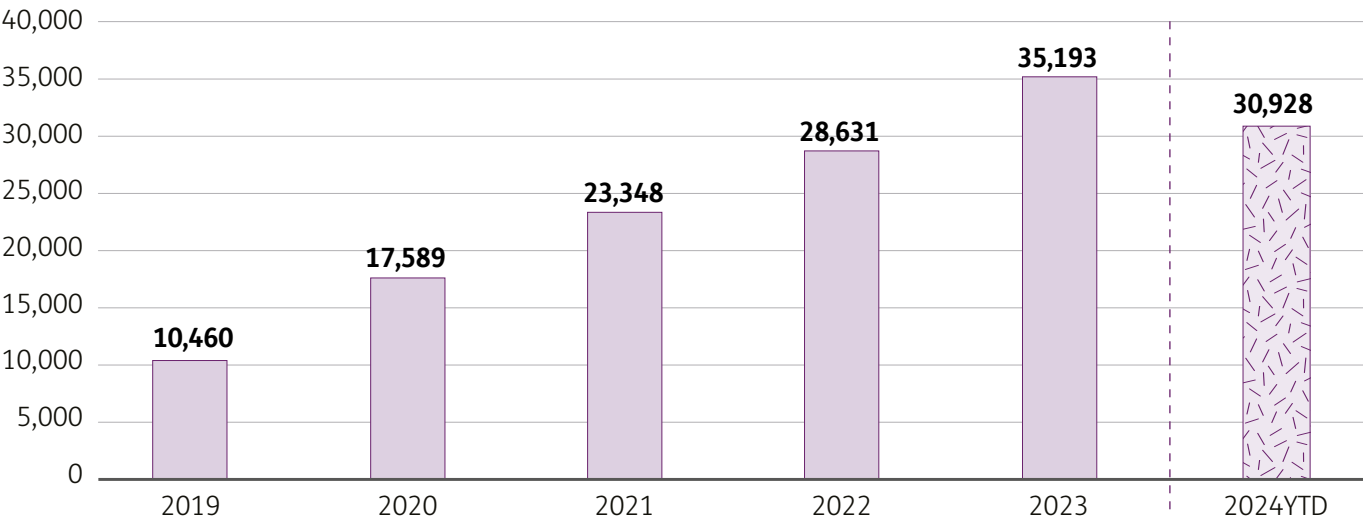
A financially sustainable Scheme achieves participant outcomes across their lifetimes, and is affordable now and into the future.

Total Scheme payments⁴¹ continue to increase due to both increased participant numbers and higher average cost per participant.

Total payments in the year to 30 June 2023 were \$35.2 billion, while the payments in the 9 months to 31 March 2024 were \$30.9 billion.⁴²

The increasing number of participants benefitting from the Scheme contributes to the increase in payments.

Total payments (\$m) for financial years ending 30 June



⁴¹ Total Scheme costs are presented by financial year on an accrual basis, sourced from the NDIA Financial Accounts. The Scheme costs figure is made of total Scheme expenses, less Scheme grant payments, write-downs and write-offs.

⁴² This compares to \$25.7 billion in the 9 months to 31 March 2023.

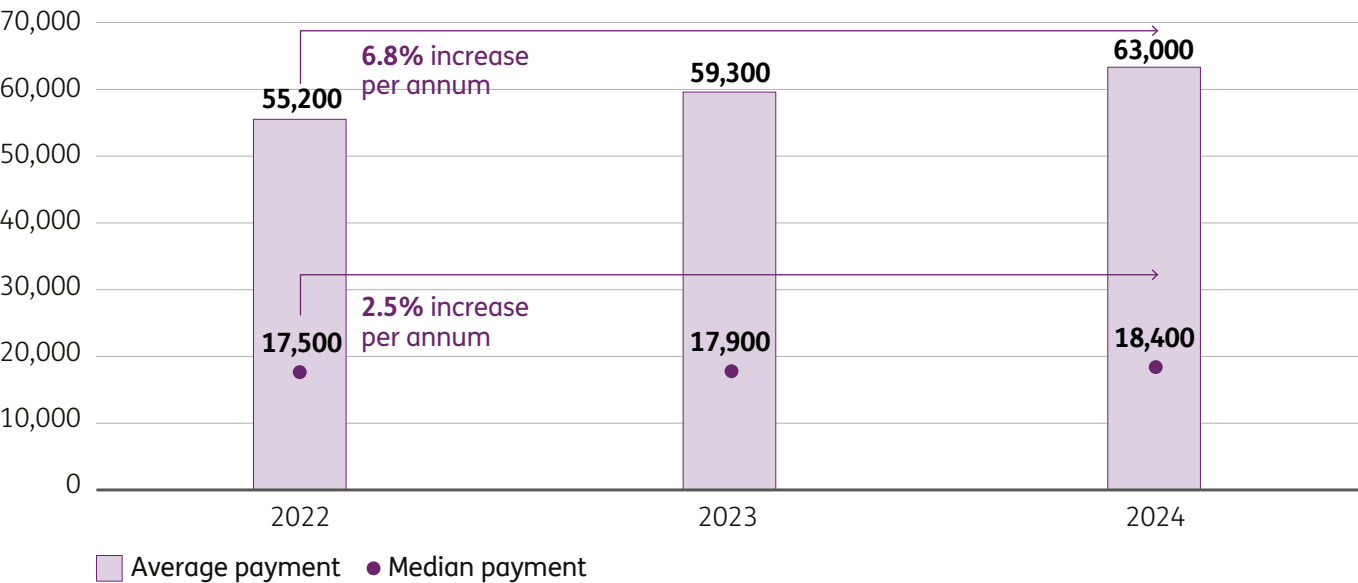
5.2 Average and median payment trends

Average and median payments per participant have increased by 6.8% and 2.5% per annum respectively over the last 2 years.

Both the average (mean) payment per participant and the median payment per participant provide useful information. In the NDIS, the average payment is much higher than the median payment because there is a skewed distribution with a small number of participants receiving very high cost supports, and a large number receiving low cost supports.

Trends in average and median payments per participant between 1 April 2022 and 31 March 2024 indicate that average payments have increased by 6.8% per annum, and median payments have increased by 2.5% per annum.

Average and median payments for years ending 31 March



5.3 Average plan budget trends

Average plan budgets have also increased over time for all participants. A bigger increase was observed for participants in SIL.

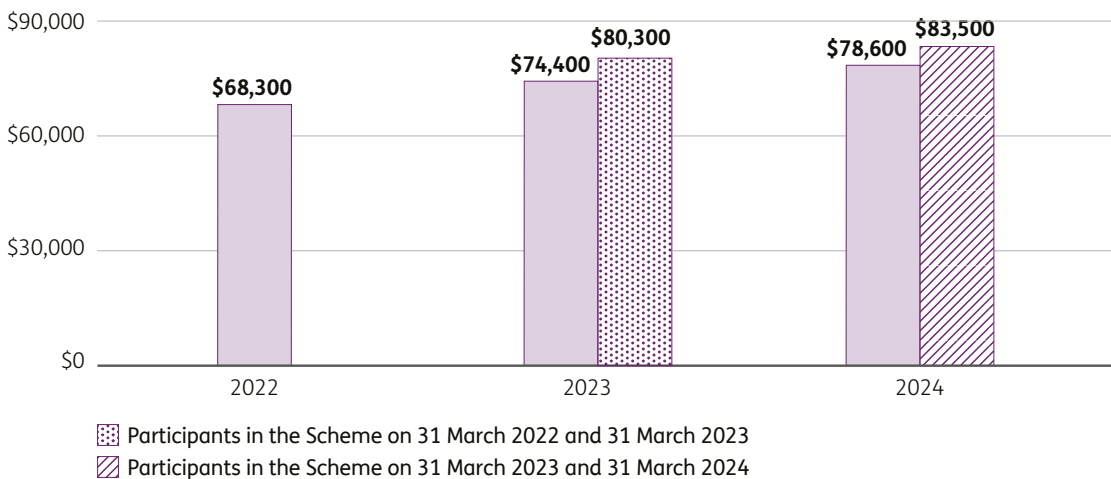
In addition to average payments increasing over time, average plan budgets have also increased over time, for both participants in SIL and not in SIL.

Specifically, over the 2 year period to 31 March 2024:

- Average plan budgets have increased by 7.3% per annum for all participants
- Average plan budgets have increased by 12.3% per annum for participants in SIL
- Average plan budgets have increased by 4.6% per annum for participants not in SIL.

Average plan budgets of participants continuing in the Scheme are higher than the overall average. For example, for these existing participants who were in the Scheme at 31 March 2022 and at 31 March 2023, the average plan budget increased from \$68,300 to \$80,300 (17.6%).

Average annualised plan budgets for years ending 31 March

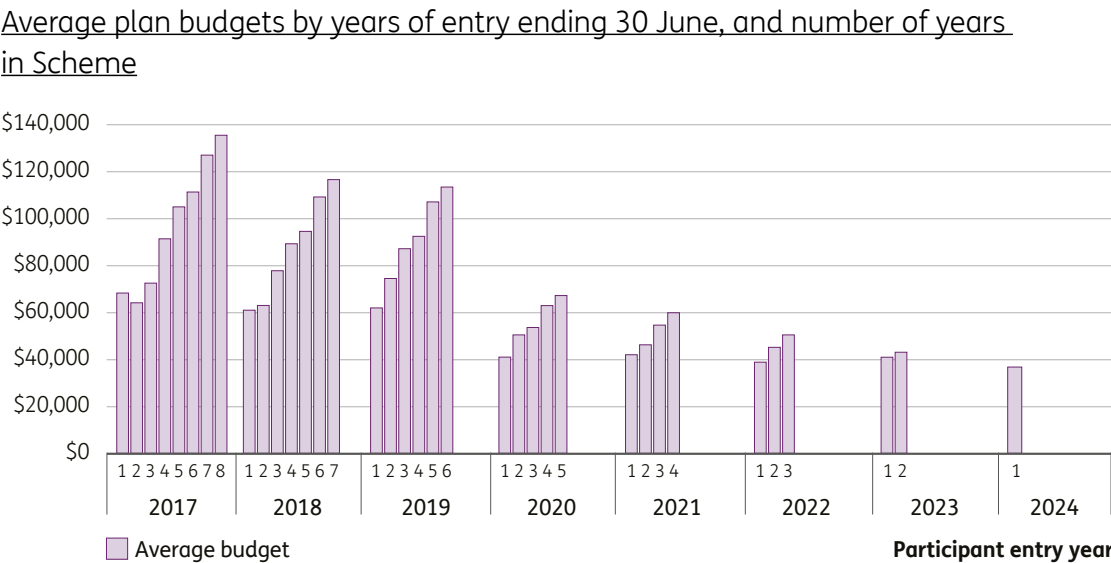


5.3 Average plan budget trends

As the mix of participants (across various characteristics) has changed over time, understanding trends in average plan budgets for the same group of participants over time is important.

Figure on the left groups participants into cohorts based on the year participants entered the Scheme and shows the trend in average plan budgets based on the number of years they have been in the Scheme. For example, average plan budgets for participants who have entered the Scheme in the year ending 30 June 2018, increased from \$61,700 for their first year to \$117,100 for participants who have been in the Scheme for 7 years.

Average plan budgets for participants entering the Scheme in the year ending 30 June 2020 or later are lower relative to those entering the Scheme in earlier years. For example, those who entered the Scheme in year ending 30 June 2020, had an average plan budget of \$41,700 for their first year, compared to a first-year budget of \$68,300 for participants who entered in the year ending 30 June 2017. This reflects a changing mix of participants over time with the earlier years prioritising the transition of participants from existing Commonwealth, State and Territory government schemes into the NDIS. Conversely, in recent years there has been a growing proportion of younger participants entering the Scheme with disabilities such as developmental delay. Children, on average, have lower plan budgets than adults.



5.3 Average plan budget trends

Plan reassessments and plan budgets variations

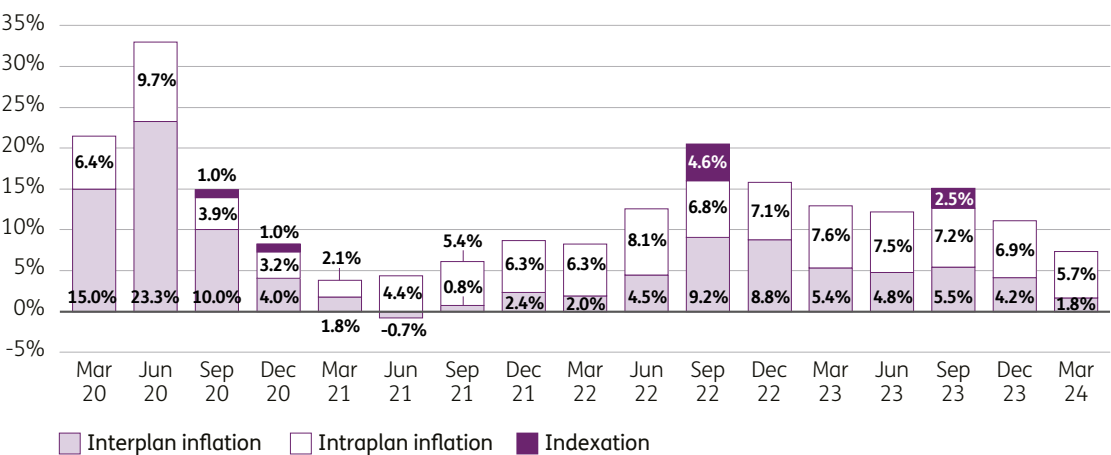
Plan reassessments result in plan budgets varying for a variety of reasons – for example, one-off Capital items in one plan and not the next. Another example is investment in Capacity Building (such as behavioural supports) resulting in less need for Core support over time. The NDIA has published an operational guideline on plan reassessments⁴³ that details the reasons a new plan could be different to a current plan.

Plan inflation

In the March 2024 quarter, total plan inflation was 1.8% (7.5% per annum). Of the 7.5% per annum total plan inflation in the quarter, 1.8% was due to changes at plan reassessment, and 5.7% was due to changes occurring within a plan between reassessments.

The plan inflation of 7.5% per annum in March 2024 compares with plan inflation of 11.2% per annum in December 2023 and 15.1% per annum in September 2023 (12.7% excluding indexation)^{44,45}. Inflation occurring at plan reassessment (interplan inflation) was 1.8% per annum, which compares with 4.2% per annum in December 2023, and 5.5% per annum in September 2023. Inflation occurring within a plan, between reassessments, (intraplan inflation) was 5.7% per annum, which compares with inflation of 6.9% per annum in December 2023, and 7.2% per annum in September 2023 (excluding indexation).

Annualised percentage change in plan budgets for active participants⁴⁶



⁴³ <https://ourguidelines.ndis.gov.au/your-plan-menu/changing-your-plan>
⁴⁴ The annualised calculation of inflation excludes the impact of plan indexation in July following the Annual Pricing Review. The impact of this indexation is then explicitly added to the annualised calculation which is a 2.5% one-off increase.
⁴⁵ The Annual Pricing Review saw price limit increases from 1 July 2023. Unspent portions of plan budgets were increased in line with new price limit to maintain the purchasing power of remaining plans. Due to this, there has been a one-off increase in intraplan and total inflation during the month of July 2023.
⁴⁶ There has been minor retrospective change between interplan and intraplan inflation due to improved identification of plan amendments.

5.3 Average plan budget trends

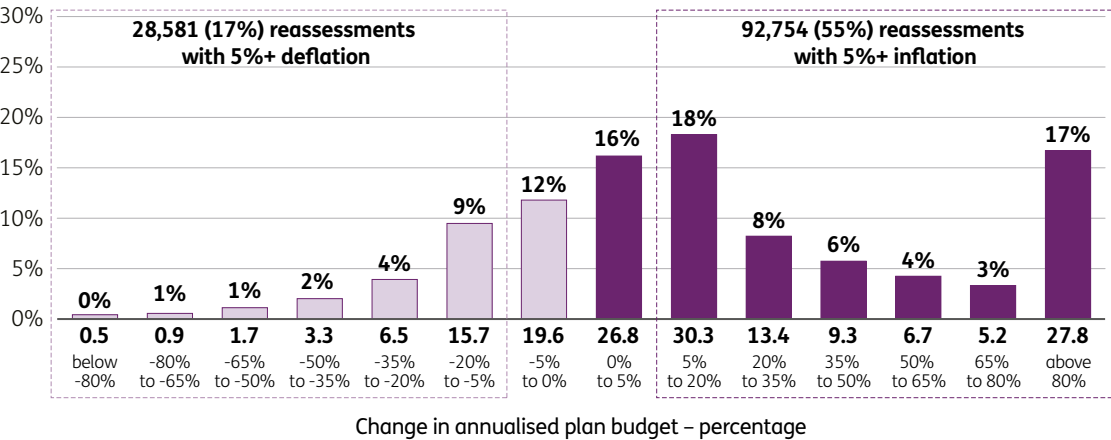
At the individual level, plan budgets can vary significantly. When looking at experience from 1 July 2023 to 31 March 2024, taking account of total plan inflation, plans were more likely to increase rather than decrease.

During the 9 month period to 31 March 2024, 24% of active participants had a plan reassessment. Of the plans reassessed:⁴⁷

- **55%** of plans increased at reassessment by more than 5% (compared to 57% in the year to 31 December 2023)
- **17%** decreased by more than 5% (compared to 17% in the year to 31 December 2023)
- **28%** remained within 5% (compared to 27% in the year to 31 December 2023).

Similar to the previous quarter, **17%** of the plans reassessed during these 9 months had their plan budget increased by more than 80%.

Distribution of the percentage change in annualised plan budgets for plans reassessed between 1 July 2023 and 31 March 2024⁴⁸



47 Numbers may add to more than 100% due to rounding.

48 The number of plan reassessments (in thousands) in each inflation percentage band is shown at the bottom of each bar in the chart. The corresponding percentage of plan reassessments in each band is shown at the top of each bar in the chart.

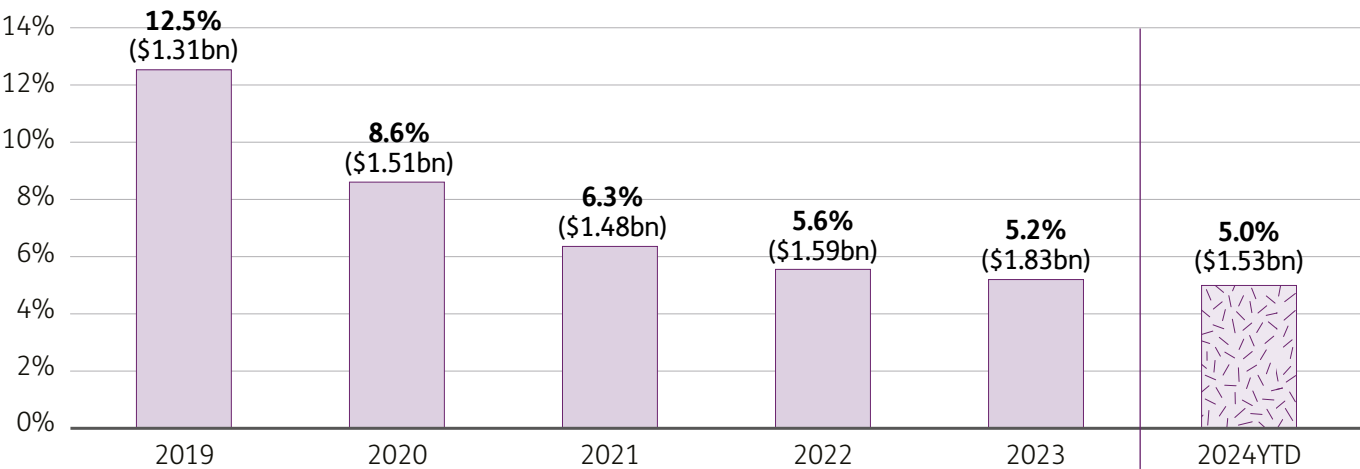
5.4 Operating expenses

Operating expenses per participant have reduced over the last 4 years.

In addition to the money spent through participant plans on supports for participants, the NDIA receives funding for its operating expenses, including paying staff wages. NDIA operating expenses for the year ending 30 June 2023 was \$1.83 billion, and \$1.53 billion in the 9 months to 31 March 2024.⁴⁹

As a percentage of participant expenditure, operating expenses have decreased from 5.6% in 2021–22 to 5.2% in 2022–23. For the 9 months to 31 March 2024 the expense percentage decreased slightly to 5.0%. The Productivity Commission in their 2017 Study report⁵⁰ suggest a range of 7% to 10% as an appropriate benchmark for NDIA operating costs.

Operating expenses as a percentage of participant costs for years ending 30 June

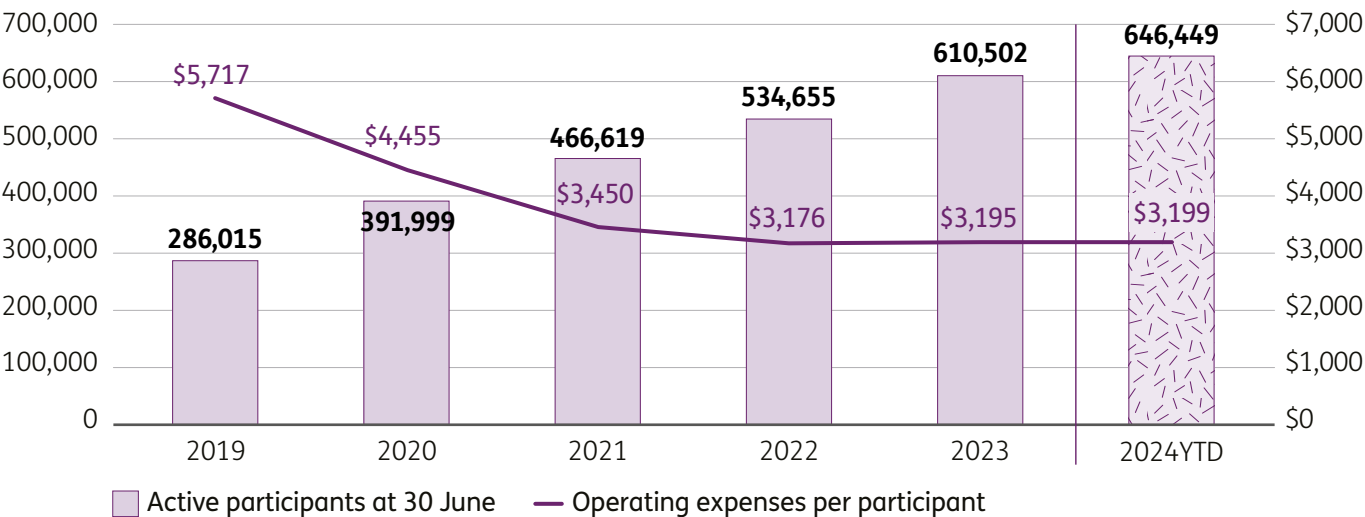


⁴⁹ Total operating expenses are based on an accrual basis.
⁵⁰ <https://www.pc.gov.au/inquiries/completed/ndis-costs#report>

5.4 Operating expenses

The annualised operating cost per participant has increased by 0.6% from \$3,176 in 2021–22 to \$3,195 in 2022–23. Annualised operating cost per participant for the 9 months to 31 March 2024 is slightly higher at \$3,242.

Operating expense per participant for years ending 30 June^{51,52}



51 The annualised operating cost per participant for 2024YTD is expected to drop given the seasonality in operating expenses.

52 The average number of participants is a simple average of the 2 periods (opening and closing) on active participants. Cost per participant uses these average participant numbers as the denominator.

Endnotes

- 1 51,689 participants with approved plans have left the NDIS in the period between 1 July 2013 and 31 March 2024.
- 2 This is the net increase in the number of active participants in the NDIS each period noting some participants have left the NDIS.
- 3 There were 9,622 participants aged 0 to 64 years with a gender of “Other” at 31 March 2024. The participation rates for this group are included within the total rates.
- 4 This compares to 8% of the Australian population identifying as First Nations Peoples who have a need for assistance. Source: Census of Population and Housing 2021 (“Need for Assistance” variable), Persons Place of Usual Residence, by Indigenous Status
- 5 The percentage of CALD participants excludes participants who identify as First Nations Peoples. Further, the NDIA published extra analysis on CALD participants in the September 2021 quarterly report (<https://www.ndis.gov.au/about-us/publications/quarterly-reports>). The analysis indicated that it is likely that CALD participants are joining the NDIS but have not been identified as CALD in the data collected, rather than a large number of CALD people with a disability not currently being in the NDIS. With the introduction of the new computer system, the opportunity to collect improved data on participants should allow better identification of CALD participants
- 6 This compares to 2% of the Australian population living in remote or very remote areas. Source: Census of Population and Housing 2021, Persons Place of Usual Residence, by Remoteness Area
- 7 Further information on these strategies can be found here: <https://www.ndis.gov.au/about-us/strategies/first-nations-strategy> and <https://www.ndis.gov.au/about-us/strategies/cultural-and-linguistic-diversity-strategy>.
- 8 <https://data.ndis.gov.au/explore-data> has detail on numbers of CALD participants and remote and very remote participants.
- 9 This section compares baseline indicator results when participants entered the Scheme, with results measured at the most recent participant plan reassessment for each respondent. Trial participants are excluded.
- 10 The participant age reported in this section is as per their latest plan reassessment.
- 11 Figures have been rounded to the nearest whole percentage; differences are calculated from unrounded metrics.
- 12 Figures have been rounded to the nearest whole percentage; differences are calculated from unrounded metrics.
- 13 Some of the increase is due to participants leaving school and starting work. As the Scheme matures it will be possible to analyse the extent to which the percentage gap increases.
- 14 Some of the decrease for older age groups is due to participants retiring from the workforce.
- 15 Some of the decrease for older age groups is due to participants retiring from the workforce.
- 16 Figures have been rounded to the nearest whole percentage; differences are calculated from unrounded metrics.
- 17 Figures have been rounded to the nearer whole percentage; differences are calculated from unrounded metrics.
- 18 Figures have been rounded to the nearer whole percentage; differences are calculated from unrounded metrics.
- 19 Figures have been rounded to the nearer whole percentage; differences are calculated from unrounded metrics.
- 20 Figures have been rounded to the nearer whole percentage; differences are calculated from unrounded metrics.
- 21 Noting that the education and housing systems have a major role to play in the lifelong learning and home domains.
- 22 <https://www.ndis.gov.au/about-us/policies/service-charter>
- 23 For the March 2024 quarter, performance is measured from available data on processes and dates on the new computer system. Milestones being built into the new computer system will improve the capture of performance data.
- 24 Exclude reassessments initiated prior to migrating service processes to the new computer system.
- 25 Exclude reassessments initiated prior to migrating service processes to the new computer system.
- 26 Exclude reassessments initiated prior to migrating service processes to the new computer system.
- 27 In the ‘My Customer Requests’ tile launched in October 2019, it is possible to record multiple related parties as the source of a complaint and in some cases both participants and providers or other parties are linked to a single case. Previously, the single source was often recorded as a participant regardless of whether a provider was associated with the complaint.
- 28 The numbers of complaints reported for the most recent quarter may still increase to the extent there is a lag in data collection.
- 29 Numbers may change as complaints reporting in the new computer system is refined including identifying complaints lodged via multiple channels.
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- 31 As part of the AAT process, it is not uncommon for new requests to be made and for new evidence to be provided by applicants while their matters are in progress. This contributes to NDIS decisions being varied in the AAT.
- 32 Further information about the AAT process can be found on the AAT website: <https://www.aat.gov.au/apply-for-a-review/national-disability-insurance-scheme-ndis/can-we-help>
- 33 From Q2 2023–24, the volume of webchats offered have been estimated as a result of reporting issues with the Agency’s new webchat functionality that was implemented in November 2023. The Agency has identified instances where a webchat was offered but not connected to a contactor or no contact was received from the requestor. These instances were removed to estimate the webchat volume.
- 34 This represents total payments on a cash basis (including payments made under in-kind arrangements). On an accrual basis, total payments were \$40.5 billion.
- 35 Includes therapy services.

- 36 Total includes \$8 million of payments with no support category.
- 37 This figure excludes participants that have opted to have part of their plan self-managed.
- 38 <https://www.ndis.gov.au/participants/using-your-plan/self-management#guide-to-self-management>
- 39 Includes cash and in-kind payments.
- 40 Active providers refer to those who have received payment in the quarter for supporting NDIS participants. The count of active providers excludes providers with an invalid Australian Business Number (ABN).
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- 42 This compares to \$25.7 billion in the 9 months to 31 March 2023.
- 43 <https://ourguidelines.ndis.gov.au/your-plan-menu/changing-your-plan>
- 44 The annualised calculation of inflation excludes the impact of plan indexation in July following the Annual Pricing Review. The impact of this indexation is then explicitly added to the annualised calculation which is a 2.5% one-off increase.
- 45 The Annual Pricing Review saw price limit increases from 1 July 2023. Unspent portions of plan budgets were increased in line with new price limit to maintain the purchasing power of remaining plans. Due to this, there has been a one-off increase in intraplan and total inflation during the month of July 2023.
- 46 There has been minor retrospective change between interplan and intraplan inflation due to improved identification of plan amendments.
- 47 Numbers may add to more than 100% due to rounding.
- 48 The number of plan reassessments (in thousands) in each inflation percentage band is shown at the bottom of each bar in the chart. The corresponding percentage of plan reassessments in each band is shown at the top of each bar in the chart.
- 49 Total operating expenses are based on an accrual basis.
- 50 <https://www.pc.gov.au/inquiries/completed/ndis-costs#report>
- 51 The annualised operating cost per participant for 2024YTD is expected to drop given the seasonality in operating expenses.
- 52 The average number of participants is a simple average of the 2 periods (opening and closing) on active participants. Cost per participant uses these average participant numbers as the denominator.



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