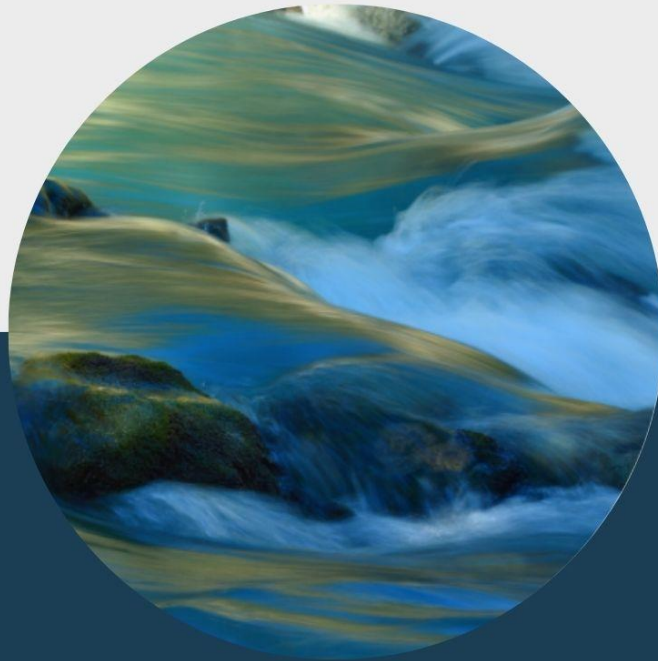


**SUBMISSION
ANAO DRAFT
2025-26
ANNUAL AUDIT
WORK PROGRAM
APRIL 2025**



OTSi

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ABOUT OTSI

OT Society Incorporated for Invisible Disabilities (OTSi) is a national society whose purpose is to enable Occupational Therapists who work alongside people with hidden and invisible disabilities, to reduce barriers to full participation in our world as active citizens of Australia. Our focus is on ensuring access to resources, opportunities, and supports for people of all ages with invisible disabilities, including access to Occupational Therapy. OTSi has a strong voice in systemic advocacy and policy direction, as well as enabling individuals to build better lives.

Invisible & Hidden Disabilities

The term ‘hidden and invisible disability’ is an umbrella term and acknowledges that the impacts of hidden and invisible disability are often poorly misunderstood or overlooked. We commit to shining a light on the impact of invisible and hidden disabilities alongside people who experience them, and to work to address barriers to active participation, and barriers to societal recognition and understanding. OTSi approach underscores the importance of empathy and awareness in interactions and accommodations, to build a more inclusive world.



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INTRODUCTION

The Occupational Therapy Society for Invisible and Hidden Disabilities (OTSi) welcomes the opportunity to provide a submission to the *Australian National Audit Office Draft 2025–26 Annual Audit Work Program*. OTSi is supportive of a strong audit program examining aspects of the care economy, and disability and mental health programs. In this submission we provide rationale for supporting a range of proposed audits and look forward to contributing to the audit schedule.

AUDITS FOCUSED ON THE ADMINISTRATION OF THE NATIONAL DISABILITY INSURANCE SCHEME (NDIS)

In 2024, the passage of the NDIS Amendment Bill heralded the most significant changes to the NDIS since inception. The reform agenda to implement changes is expansive, and concern has been raised regarding the scale and pace of current reforms. A recent call to government to slow the pace of reform to enable considered planning and change-implementation, was signed by over 250 organisations nationally, including all of Australia's disability representative organisations [[Campaign Statement: Take the Time for Codesign - Protect NDIS Participants' Safety and Wellbeing - Every Australian Counts](#)]. The concerns focus on the potential safety -impact on disabled people, and access to essential disability supports. OTSi supports a strong audit schedule focused on the National Disability Insurance Agency (NDIA), and the delivery and governance of the NDIS, to ensure strong evidence unpinning future administration of the Scheme as the reform agenda proceeds.

Existing measures of NDIS participant outcomes are vague and do not capture the broad range of lived outcomes experienced by NDIS participants. OTSi strongly supports an audit focused on the measurement of NDIS participant outcomes. OTSi seeks that a broad range of participant outcomes are examined, including factors that relate to Agency decision-making and correlate with adverse outcome such as participant complaints, harm, or death. This would include adverse outcomes as a result of funding cuts, or extensive AAT/ART proceedings. Further, exploring positive outcomes such as decreased participant reliance on acute systems; sustained housing; and increased community engagement is imperative to understand the impact of the NDIS. These outcomes do not currently appear to be measured not are not publicly available.

OTSi supports the draft audit program proposed by the ANAO and regard this audit schedule as essential to stabilise and support the NDIS, and to ensure a high standard of scheme governance:

National Disability Insurance Agency

- Design and implementation of the Participants, Platforms and Processes Program
- Funding of assistive technology supports under the National Disability Insurance Scheme
- Governance of the NDIS Fraud Fusion Taskforce
- Management of National Disability Insurance Scheme participant critical incidents
- Market stewardship of the care and support economy
- Measuring National Disability Insurance Scheme participant outcomes

In addition, OTSi supports the proposed Services Australia audit **Management of automated decision making** and highlight the relevance of this audit to NDIS reform. The NDIA has stated an intention to commence new assessment and budget-setting processes set to commence in September 2025. It appears these new processes will commence without research or trialling. The extent of automated or algorithm-based decision-making is unclear. It is essential that ANAO audit existing systems of automated decision-making and that the learnings are applied to NDIS processes at this critical point of Scheme reform.

ADDITIIONAL AUDITS THAT CAN ENHANCE THE SUPPORT AND SERVICES OFFERED TO PEOPLE LIVING WITH DISABILITIES

OTSi supports an ANAO audit into **Primary Health Networks' administration of Commonwealth funding**.

The effective administration of Commonwealth funding by Primary Health Networks (PHNs) is essential to ensuring that primary health care services are delivered efficiently, equitably, and in alignment with national health priorities. Given the substantial public investment in PHNs, regular, independent auditing of their financial practices is necessary to uphold transparency, accountability, and public trust. An audit would assess whether PHNs are allocating and managing funds in a manner that responds to the specific health needs of local communities, while also evaluating the effectiveness of governance arrangements and the efficiency of their operations.

An evidence-based audit would not only provide clarity around current performance but also support ongoing reforms aimed at strengthening service delivery and ensuring the long-term effectiveness and integrity of the PHN program.

OTSi supports an ANAO audit into **the coordination and targeting of mental health funding**

Auditing the coordination and targeting of mental health funding is essential to ensure that government investments are delivering the intended outcomes effectively and equitably. The review of the National Mental Health and Suicide Prevention Agreement (NMHSPA) highlights several systemic challenges, including fragmented service delivery, overlapping responsibilities between levels of government, and inconsistent allocation of resources. These issues hinder the ability to provide timely, needs-based care and undermine accountability.

Moreover, the absence of comprehensive data and transparent performance monitoring makes it difficult to assess whether funding is reaching high-need populations or contributing to improved mental health outcomes. An audit would identify inefficiencies, reveal duplication or gaps in service delivery, and support reforms that align funding with strategic priorities such as early intervention, regional equity, and culturally appropriate care—including for Aboriginal and Torres Strait Islander communities. By auditing coordination and targeting efforts, the government can drive better integration across jurisdictions, strengthen accountability, and ensure mental health investments yield meaningful and measurable benefits for all Australians.

OTSi supports an ANAO audit into **the administration of the Disability Support Pension**

The Australian Government should audit the administration of the Disability Support Pension (DSP) to ensure the system is fair, transparent, and functioning as intended for those who rely on it. Concerns have been raised about inconsistent eligibility assessments, lengthy processing times, and a lack of support for individuals navigating the application process. An independent audit would help identify inefficiencies, assess whether current practices align with policy objectives, and ensure that public funds are being used effectively. Importantly, it would also help restore confidence in the system by ensuring that the most vulnerable Australians are receiving the support they need in a timely and equitable manner.