



**PEOPLE WITH DISABILITY  
AUSTRALIA**

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of our  
own**

# **Submission to the NDIS Evidence Advisory Committee**

**OCTOBER  
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# Copyright information

## *Submission to the NDIS Evidence Advisory Committee Consultation*

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# About PWDA

People with Disability Australia (PWDA) is a national disability rights and advocacy organisation made up of, and led by, people with disability.

We have a vision of a socially just, accessible and inclusive community in which the contribution, potential and diversity of people with disability are not only recognised and respected but also celebrated.

PWDA was established in 1981, during the International Year of Disabled Persons.

We are a peak, non-profit, non-government organisation that represents the interests of people with all kinds of disability.

We also represent people with disability at the United Nations, particularly in relation to the United Nations Convention on the Rights of Persons with Disabilities (CRPD).

Our work is grounded in a human rights framework that recognises the CRPD and related mechanisms as fundamental tools for advancing the rights of people with disability.

PWDA is a member of Disabled People's Organisations Australia (DPO Australia), along with the First People's Disability Network, National Ethnic Disability Alliance and Women with Disabilities Australia.

DPOs collectively form a disability rights movement that places people with disability at the centre of decision-making in all aspects of our lives.

'Nothing About Us, Without Us' is the motto of Disabled Peoples' International.

# Introduction

PWDA welcomes the opportunity to provide input to the NDIS Evidence Advisory Committee's (EAC) assessment of:

- Active passive trainers
- Assistance animals for autistic people or people with intellectual disability
- Psychiatric assistance dogs
- Seizure alert dogs
- Exercise physiology
- Smart home appliances (for cooking, cleaning and gardening).

PWDA's submission will address NDIS funding for assistance animals for Autistic people and people with intellectual disability, psychiatric assistance dogs, seizure alert dogs, and smart-home appliances, as beneficial, cost-effective, rights-affirming, and aligned with core NDIS objectives of safety, choice, independence, quality of life, and functional capacity enhancement. Although this submission does not explore these areas, we acknowledge the important role of active passive trainers and exercise physiology. We also recognise that other peak bodies and organisations, with their specialised expertise and evidence base, are better positioned to contribute meaningfully to the consultation process as subject matter experts on these supports.

While PWDA acknowledges the importance of published evidence to inform the EAC's assessment of supports, we are concerned about the lack of published research into the benefits of the above mentioned supports which incorporates the lived experience of people with disability, and the risks if the EAC were to rely heavily on published evidence.

PWDA believes the lived experience of people with disability must inform all decision-making on matters that affect people with disability. We urge the EAC to consider lived experience expertise when deciding what constitutes 'evidence' of effectiveness, safety and quality.

Currently data collection is limited as people with disability have historically been excluded or had little opportunity to actively participate in clinical research, much of the time due to inappropriate ethics requirements. Due to longstanding challenges and gaps in the collection of disability-related data, there is limited research on the use of assistance animals and smart home appliances and consequently the NDIS support lists are too medicalised and narrow in what has been considered 'evidence-based'.

Research and data collection should be co-produced with people with disability and their representative organisations as active partners. Qualitative feedback from people with disability and families and carers of people with disability should be highly sought and regarded when evaluating the value and benefits of funding supports, as outlined in PWDA's [NDIS Supports Rule Submission](#).

Basing policy on existing evidence is important, however this approach results in the exclusion of alternative therapies we know work in specific cases, or for some groups of people with disability.

## Discussion

# Assistance animals for Autistic people and people with intellectual disability

Assistance dogs aren't just pets — they're highly trained animals that help people with disability navigate daily life. For someone with autism, an assistance dog might help reduce anxiety in public spaces, interrupt self-harming behaviours, or provide calming sensory input. For someone with intellectual disability, a dog might assist with routines, offer emotional support, or help with tasks like opening doors or alerting others in emergencies.

However, the NDIS does not generally fund assistance animals for autistic people or people with intellectual disabilities, viewing these as day-to-day living costs. The NDIS

currently applies a narrow set of eligibility criteria for funding assistance dogs, limiting support to specific disabilities including hearing, vision physical disabilities and PTSD, but it may consider other types under specific circumstances.

To be funded, the dog must meet the NDIS's "reasonable and necessary" criteria, meaning it must be effective, beneficial, and good value for money compared to other options.

In March 2025, PWDA, in collaboration with the Australian Autism Alliance, released a [joint statement](#) calling for a National Assistance Animal Framework, citing overwhelming stakeholder support (94%) for:

- Uniform Public Asset Tests (PAT)
- Standardised accreditation
- National ID cards for assistance animals, and
- Higher training and accessibility standards.

In PWDA's experience, assistance animals offer the opportunity for people with disability to achieve greater independence and inclusion, but inconsistent laws, processes and understanding have contributed to inaccessibility and discrimination. Limiting assistance dogs to a narrow set of conditions is arbitrary and outdated.

The NDIA conducted a systematic review (November 2023) analysing 23 studies, including both quantitative and qualitative data, on assistance dogs and pet dogs with individuals with autism.<sup>1</sup>

The quantitative findings indicate improvements in adaptive functioning, mental health, child safety, family outcomes, and social/emotional regulation.<sup>2</sup>

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<sup>1</sup> NDIS. "Assistance Dogs for people with autism" (2024). <https://dataresearch.ndis.gov.au/research-and-evaluation/market-stewardship-and-employment/assistance-dogs-people-autism>

<sup>2</sup> Ibid

Qualitative feedback from families highlighted enhanced social interaction, better emotional regulation for children, and reduced parental stress — though pet dogs provided some of the same benefits.<sup>3</sup>

A 2024 longitudinal UK evaluation involving over 300 participants demonstrated that placements of assistance dogs led to sustained improvements in quality of life for children and adults with autism or physical disability, manifesting as greater independence, stronger human-animal bonds, and more positive family dynamics.<sup>4</sup>

Although targeted research on intellectual disability is less abundant, assistance animals are documented to provide broad support across multiple domains — mobility, daily functioning, alerting and social engagement — applicable to individuals with intellectual disability. <sup>5</sup>[https://link.springer.com/rwe/10.1007/978-3-031-40858-8\\_74-1](https://link.springer.com/rwe/10.1007/978-3-031-40858-8_74-1)

PWDA urges the EAC to look beyond clinical research and assess assistance animals using the same criteria as music and art therapy. The recent government-ordered review of the evidence behind the use of music and art therapy, led by health economist Stephen Duckett, found art and music therapies can be effective and even life-changing for some people with disability.

The outcome of that review provides a useful example of how lived experience expertise should be applied to the use of assistance animals for Autistic people or people with intellectual disability.

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<sup>3</sup> Ibid

<sup>4</sup> Emily Showsmith, CABI Human-Animal Interactions. “*The impact of living with assistance dog placements on quality of life in children and adults with autism spectrum disorder or a physical disability*” (2024) <https://www.cabidigitallibrary.org/doi/pdf/10.1079/hai.2024.0014>

<sup>5</sup> Tiffani J. Howell, Springer Nature Link. *Role of Assistance Animals in Disability*. (2025) [https://link.springer.com/rwe/10.1007/978-3-031-40858-8\\_74-1](https://link.springer.com/rwe/10.1007/978-3-031-40858-8_74-1)

We agree with the Duckett report's recommendation "that the NDIS Evidence Advisory Committee develop a process for making decisions where there is a poorly developed evidence base."<sup>6</sup>

## Why funding assistance animals aligns with the NDIS

### Promotes Independence and Social Participation

- Assistance dogs enable individuals with autism or intellectual disability to navigate public spaces, independently manage routines, and engage socially, reducing reliance on paid or informal carers.<sup>7</sup>

### Strengthens Mental Health and Wellbeing

- Studies show significant gains in emotional regulation, reductions in anxiety and self-harming behaviours, and improved sleep patterns — all of which contribute to mental health and reduce broader service needs.<sup>8 9</sup>

### Benefits Families and Caregivers

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<sup>6</sup> Dr Stephen Duckett, NDIS. *Independent review into art and music therapy*. (2025) <https://dataresearch.ndis.gov.au/research-and-evaluation/decision-making-access-and-planning/independent-review-art-and-music-supports>

<sup>7</sup> Fiona Bridger, Achieve Australia. *Benefits of animal companies to people with disability*. (2023) <https://www.achievaustralia.org.au/en/stories/benefits-of-animal-companions-to-people-with-disability>

<sup>8</sup> Paula Galvany-Lopez, MDPI. *The Impact of Dog-Assisted Therapy Among Children and Adolescents with Autism Spectrum Disorder: A Systemic Review*. (2024) <https://www.mdpi.com/2227-9067/11/12/1499>

<sup>9</sup> Kerri E. Rodriguez, *Frontiers in Psychiatry*. Volume 15, (2024) <https://www.frontiersin.org/journals/psychiatry/articles/10.3389/fpsyg.2024.1355970/full>

- Assistance dogs provide respite for caregivers, foster positive family interactions, and alleviate parental stress, contributing to family cohesion.<sup>10, 11</sup>

### Cost-Effectiveness and Long-term Value

- Assistance dogs offer long-term support over many years, potentially reducing the need for ongoing support staff or therapy.<sup>12</sup>

## Recommendation 1. The EAC should recommend funding of Assistance animals for Autistic people or people with intellectual disability by:

- a. Explicitly recognising assistance dogs for autism and intellectual disability under NDIS guidelines as reasonable and necessary supports.
- b. Expanding funding eligibility to include all functional roles of assistance dogs proven to benefit individuals, ensuring public access and inclusion.
- c. Promoting the implementation of standardised accreditation and Public Asset Tests (PAT) compliance in line with the national framework endorsed by PWDA and stakeholders.

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<sup>10</sup> NDIS. "Assistance Dogs for people with autism" (2024). <https://dataresearch.ndis.gov.au/research-and-evaluation/market-stewardship-and-employment/assistance-dogs-people-autism>

<sup>11</sup> Emily Showsmith, CABI Human-Animal Interactions. "The impact of living with assistance dog placements on quality of life in children and adults with autism spectrum disorder or a physical disability" (2024) <https://www.cabidigitallibrary.org/doi/pdf/10.1079/hai.2024.0014>

<sup>12</sup> Fiona Bridger, Achieve Australia. *Benefits of animal companies to people with disability*. (2023) <https://www.achieveaustralia.org.au/en/stories/benefits-of-animal-companions-to-people-with-disability>

# Psychiatric assistance dogs (PADs)

PADs are defined as service dogs specifically trained to assist individuals with mental health conditions such as PTSD, anxiety, depression, bipolar disorder, and schizophrenia. They perform specialised tasks to support mental and emotional well-being, beyond companionship or emotional support.

NDIS funding for PADs is limited to people with PTSD but only if it's the sole diagnosed psychiatric condition, and eligibility is strict, requiring the dog to be professionally trained and meet specific NDIS criteria. Funding is only available if the dog is an eligible assistance animal that is effective and beneficial for your disability, supports NDIS goals, and you can provide strong evidence that other supports have been insufficient. The dog must be fully trained, pass a Public Access Test, and the cost must be a reasonable and necessary NDIS support.

Therefore, people with complex mental health conditions, who would significantly benefit from the assistance of a PAD are currently excluded.

PADs provide life-changing benefits for people with disability including a reduction in anxiety and depression. A 2019 UK/Australian study of 199 PAD owners living with mental health disorders found:

- 94% reported anxiety reduction through tactile stimulation
- 71% noted dogs “nudging/pawing to bring them back to the present”
- 45% used dogs for deep pressure techniques
- Many reported reduced suicidal attempts, hospitalisations, and medication use; others noted improved therapy attendance. <sup>13</sup>

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<sup>13</sup> Janice Lloyd, *Frontiers in Veterinary Science*, Volume 6, (2019). *Psychiatric Assistance Dog Use for People Living With Mental Health Disorders*. <https://www.frontiersin.org/journals/veterinary-science/articles/10.3389/fvets.2019.00166/full>

- These dogs enable increased independence, confidence in public settings, and facilitate access to education, work, and transport. <sup>14 15</sup>

## Why funding assistance dogs aligns with the NDIS

### Independence and Social Inclusion

- Dogs help individuals engage with community life when symptoms would otherwise mean isolation. They reliably support routines and confidence.

### Mental Health Outcomes

- Clinical input confirms dogs reduce dissociation, anxiety, trauma triggers, and enhance daily functioning. This improves quality of life and reduces reliance on high-level interventions.

### Value for Money

- One-time investment in a dog's training can delay or reduce expensive crisis care or constant human support, delivering long-term financial and personal dividends. Reduced need for hospitalisation and medication; less human-care dependency. <sup>16</sup>

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<sup>14</sup> Ibid

<sup>15</sup> Justice and Equity Centre. (2022). *The NDIA's faulty guidelines on assistance animals are forcing people to battle for critical support.* <https://jec.org.au/disability-rights/a-fairer-ndis/the-ndias-faulty-guidelines-on-assistance-animals-are-forcing-people-to-battle-for-critical-support/>

<sup>16</sup> Janice Lloyd, Frontiers in Veterinary Science, Volume 6, (2019). *Psychiatric Assistance Dog Use for People Living With Mental Health Disorders.* <https://www.frontiersin.org/journals/veterinary-science/articles/10.3389/fvets.2019.00166/full>

<sup>17</sup> Justice and Equity Centre. (2022). *The NDIA's faulty guidelines on assistance animals are forcing people to battle for critical support.* <https://jec.org.au/disability-rights/a-fairer-ndis/the-ndias-faulty-guidelines-on-assistance-animals-are-forcing-people-to-battle-for-critical-support/>

## **Recommendation 2. The EAC should recommend funding of psychiatric assistance dogs for a broader spectrum of mental health disorders by:**

- a. Acknowledging psychiatric assistance dogs as eligible supports under “reasonable and necessary” criteria.
- b. Broaden the definition of “assistance animal” to explicitly include PADs trained for mental health conditions such as anxiety, depression, bipolar disorder, OCD, and schizophrenia — aligning with Disability Discrimination Act definitions.
- c. Amending Operational Guidelines to fund training, registration, and ongoing needs for psychiatric assistance dogs.
- d. Adopting National Training Standards through a unified public access and accreditation framework, as per PWDA and the Australian Autism Alliance’s [joint statement](#).
- e. Monitoring outcomes: collect data on mental health improvements, social participation, and cost savings — to refine policy.

## **Seizure alert dogs**

Seizure alert or response dogs (SADs) are trained service animals that either predict an impending seizure or assist during and after a seizure by performing specific tasks such as activating an alarm, fetching medication, positioning their handler safely, or summoning help.

While current NDIS funding focuses primarily on guide, hearing, and autism assistance dogs, there is growing evidence of the unique benefits SADs offer to individuals with epilepsy or seizure-related conditions.<sup>18</sup>

Clinical evidence from the 2024 EPISODE study (Epilepsy Support Dog Evaluation) conducted in the Netherlands found that adding a seizure dog to standard care for people with severe, medically refractory epilepsy significantly reduced seizure frequency, from 115 to 73 seizures per 28 days, and improved quality of life.<sup>19</sup>

Commissioned by the Dutch Ministry of Health, the study aimed to inform a reimbursement decision for seizure dogs by evaluating their effectiveness beyond traditional care. The results indicate that seizure dogs are a beneficial intervention for this population.

Anecdotal and qualitative data show dogs provide early alerts (70–85% reliability) up to 5 hours before a seizure, improving safety and enabling timely intervention. Handlers report fewer injuries, regained freedom, improved community participation, restored employment and study potential.<sup>20</sup>

## Why funding seizure alert dogs aligns with the NDIS

### Promotes independence

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<sup>18</sup> Epilepsy Foundation. *Seizure Dogs* (2027) <https://www.epilepsy.com/recognition/seizure-dogs>

<sup>19</sup> Valerie van Hezik-Wester. Neurology, March issue (2025) Effectiveness of Seizure Dogs for People With Severe Refractory Epilepsy. <https://www.neurology.org/doi/10.1212/WNL.000000000209178>

<sup>20</sup> Amelie Catala. Plos.org. (2018) *Dog alerting and /or responding to epileptic seizures: A scoping review.* <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0208280>

- Seizure alert dogs enable participants to live more autonomously by providing early warnings and support during seizures, reducing reliance on constant human supervision.

### **Enhances safety and reduces risk**

- These dogs can prevent injuries by alerting individuals before a seizure occurs, allowing them to move to a safe position or notify others.

### **Supports community participation**

- With the confidence and security provided by a seizure alert dog, participants are more likely to engage in education, employment, and social activities.

### **Delivers value for money**

- Over time, seizure alert dogs can reduce the need for paid support workers, emergency services, and hospital admissions — making them a cost-effective support.

### **Improves health and wellbeing:**

- The presence of a trained dog can reduce anxiety, improve mental health, and provide emotional reassurance, especially for people with frequent or unpredictable seizures.

### **Fulfils the NDIS commitment to reasonable and necessary supports**

- When prescribed by health professionals and trained by accredited providers, seizure alert dogs meet the criteria for supports that are effective, evidence-based, and disability-related.

## **Recommendation 3. PWDA urges the EAC to act and make this support more accessible to those who need it by:**

- a. Amending NDIS Assistance Animals Guideline to include seizure alert dogs as a funded category.
- b. Recognising seizure alert and response dogs as legitimate supports under the NDIS.
- c. Clarifying the funding pathway so people know what evidence is needed and how to apply.
- d. Streamlining the process, reducing delays and uncertainty.
- e. Supporting training and upkeep costs, so people aren't left out due to financial barriers.

## **Smart home appliances for cooking, cleaning and gardening**

The NDIS funds personal domestic supports under "Assistance with Daily Life" for tasks like cleaning, laundry, or gardening — but only if directly related to a participant's disability and not covered by informal support. Similarly, smart home tech fits under "Assistive Technology." Items under \$1,500 might be fast-tracked; higher-cost tech needs more assessment and justification.

### Smart-Home Appliances:

- Enable daily task completion (cooking, cleaning, gardening)
- Increase capacity to live autonomously with fewer supports. For example, smart door locks, lighting, and irrigation systems allow participants to handle gardening,

home access, and safety remotely, reducing physical strain and reliance on others.

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- Are cost-effective as they may reduce need for personal care, home modifications, and incident response
- A 2024 global scoping review covered 100 peer-reviewed papers examining assistive kitchen tools — robotic aids, smart cooking systems, and AI support — highlighting their potential for enhancing independence and nutrition among older adults and people with disability.<sup>22</sup>

## Why funding smart home appliances aligns with the NDIS

### Promotes independence

- Smart appliances allow participants to perform daily tasks like cooking, vacuuming, or watering the garden without needing physical assistance.

### Enhances safety

- Devices such as smart ovens, induction cooktops, and robotic mowers reduce the risk of burns, falls, or injury — especially for people with mobility, cognitive, or sensory impairments.

### Supports community and home participation

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<sup>21</sup> Luu Vinh. *Smart Home Technology for NDIS participants*. (2025) <https://www.tonish.com.au/post/smart-home-technology-for-ndis-participants>

<sup>22</sup> Rongbo Hu. International Symposium on Automation and Robotics in Construction. (2024) *Trends, Challenges and Opportunities in Assistive and Robotic Kitchen Technologies for Aging Society: A Scoping Review*. [https://www.iaarc.org/publications/fulltext/072\\_ISARC\\_2024\\_Paper\\_110.pdf](https://www.iaarc.org/publications/fulltext/072_ISARC_2024_Paper_110.pdf)

- By enabling people to manage their own homes, smart appliances help participants remain active in their communities and maintain stable, independent living arrangements.

### **Delivers value for money**

- Over time, smart appliances can reduce the need for paid support workers or home care services, making them a cost-effective investment.

### **Improves health and wellbeing**

- Being able to cook healthy meals, maintain a clean home, and enjoy gardening contributes to better physical and mental health.

### **Aligns with assistive technology principles**

- These devices meet the NDIS definition of assistive technology — helping people do things they otherwise couldn't do safely or independently.

## **Recommendation 4. Make smart home appliances genuinely accessible under the NDIS by:**

- a. Explicitly listing smart-home devices (e.g., voice-activated kettles, smart vacuums) under Assistive Technology guidelines.
- b. Clarifying eligibility criteria and funding pathways, so planners, NDIA staff, and participants know what's covered and why.
- c. Streamlining approvals, especially for items under \$1,500, with quick approvals based on standard evidence of disability-related need.
- d. Supporting tech training for participants, plus funding for installation and programming of devices.

# Conclusion

PWDA supports introducing and broadening funding of assistance animals for Autistic people or people with intellectual disability, psychiatric assistance dogs, seizure alert dogs and smart home appliances for cooking, cleaning and gardening.

Access to assistance animals and smart home technologies is a fundamental human right for people with disability, enabling autonomy, safety, and dignity in daily life. The NDIS must recognise that these supports are not luxuries but essential tools that uphold the right to live independently and participate fully in the community. Broadening eligibility, access and funding for these supports ensures equity and inclusion for people with disability.



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For individual advocacy support contact PWDA between 9 am and 5 pm (AEST/AEDT) Monday to Friday via phone (toll free) on **1800 843 929** or via email at [pwd@pwd.org.au](mailto:pwd@pwd.org.au)

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