

What is in a form? Examining the complexity of application forms and administrative burden

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Abstract

Analysis of the welfare state emphasises that access to social security support is a key component of the relationship between the state and the citizen. Recent literature has identified administrative burden as a concept that helps us to understand an emerging dynamic between the state and the citizen, where citizens must deal with increasingly onerous administrative ‘costs’ in order to access services or support from the state. Increased administrative burden has been identified at many stages of access to social security support and government services. Burdens are often talked about in general terms, that is, the amount of administrative complexity associated with a particular welfare service. In this paper, we look at how administrative burden can be found in even the smallest unit of administration—application forms. Taking a form from the Australian National Disability Insurance Scheme (NDIS), we contribute to the growing literature on application forms and administrative burden by developing a framework to assess the complexity of questions on an application form. We show that in areas where citizens lives are complex, questions on forms can constrain the capacity of citizens to accurately represent their circumstances and, in turn, constrain their ability to gain access to support.

KEYWORDS

administrative burden, disability support, government forms, social security, welfare state

1 | INTRODUCTION

Despite challenges to modern welfare states, social care services remain some of the largest areas of government spending, demonstrating the durability of the underpinning logic that government's should provide for the needs of citizens (Carey & Crammond, 2017; Esping-Anderson, 1990; Pavolini & Ranci, 2008; Williams et al., 2012). However, inequities in provision and access of social care services are a persistent issue (Marmot, 2012). Many barriers have been examined, from sufficiency of services to their cultural and social appropriateness (Anttonen, 2012; Carey & Crammond, 2017). Indeed, access to these services is mediated by a wide range of factors.

One of the first steps in gaining access to most services provided by government is to fill out some type of form. In fact, forms play a critical role in access to public programs. Yet, because they are often thought of as an innocuous piece of the social security system, they receive very little analytical attention. However, in a variety of different ways forms play a critical role in shaping the wider accessibility to services and other government entitlements (Meers, 2020). At the most basic level, correct completion of a form is necessary for access. In this sense, they can act as a filtering mechanism that limits access to people based upon whether they meet the relevant criteria within the form. They can also be overwhelming for potential applicants, and thus deter people who are eligible from applying.

One strand of public administration research that highlights the importance of forms is the growing literature on administrative burden. Increasingly administrative burden is being recognised as a means by which access to government supports and services can be constrained (Herd & Moynihan, 2019). This paper adds to the growing literature on administrative burden by developing a framework to evaluate question complexity on forms. We focus on one form in particular, and the role it plays in gaining access to one of the largest social service reforms in recent decades—the Australian National Disability Insurance Scheme (NDIS). In this paper, we examine the very first step in accessing the scheme—completing the NDIS eligibility form—in order to examine the ways that seemingly innocuous parts of the welfare system may be exclusionary and create inequitable administrative burden, which some individuals can navigate better than others.

2 | BACKGROUND

Administrative burden as a concept is well understood at an abstract level, with a growing body of research applying it in more concrete empirical contexts (Herd & Moynihan, 2019). This is evident across the recent work on administrative burden in a number of different national contexts, including Australia (Carey et al., 2020), Belgium (Jilke et al., 2018), Pakistan (Masood & Nisar, 2021), and South Africa (Heinrich, 2016). Across these different contexts, the concept has been used to highlight unequal distribution of administrative burdens, and the concept is particularly useful for thinking about application process for people who may be resource disadvantaged, as administrative burden can amplify those disadvantages.

In the United States, administrative burden has been identified as a constraint in accessing Medicaid (Moynihan et al., 2016). Moynihan et al. (2016, p. 510) find that overall levels of administrative burden are associated with service take-up among the general population and among children. They find that this is true across multiple aspects of accessing services, with higher service take-up when applications have fewer questions, have lower expense reporting burden, and do not require an interview (Moynihan et al., 2016, p. 510).

Early work on administrative burden defined the concept in relation to ‘an individual’s experience of a policy’s implementation as onerous’ (Burden et al., 2012). This definition highlights the overall level of burden that state-based administration and bureaucracy places upon citizens in a more general manner, and that these burdens can take a variety of forms. In addition to thinking about administrative burden in a general sense, later definitions have identified different types of administrative burden. More complex definitions have raised three types of costs in public settings (Moynihan et al., 2015):

1. **Learning costs:** people need to seek information about the existence of programs and eligibility criteria;
2. **Compliance costs:** the time, effort, and financial costs of meeting administrative demands;
3. **Psychological costs:** stigma can arise from unpopular programs, experience of disempowerment, loss of autonomy, stress, and frustration.

Each type of administrative burden can provide insights about specific ways that citizens can fail to access programs that they are entitled to. They can also be used to more subtly understand inequalities in the administrative burden experienced by different citizens when they try to access a program.

Often compliance and learning costs are not distributed equally, and thus can place unequal burdens on people seeking to access a service or program. The way that these costs are unequally distributed can have normative implications (Carey et al., 2021; Cook, 2021b), and this is a central theme we explore in our discussion section. As identified by Carey et al. (2021) in this symposium, we also highlight that social capital is an important moderator of learning and compliance costs. This is because some groups seeking to access supports may be more challenged to meet certain learning costs than others (Christensen et al., 2020). For example, people with psycho-social disabilities may face additional challenges accessing information. Similarly, if a reporting requirement involves an online component, it is more burdensome for members of the community who do not have stable access to the internet.

3 | APPLICATION FORMS

The increasing recognition of the significance of forms in accessing government support has resulted in a growing body of scholarship undertaking form-led analysis (for examples, see Cook, 2021a; Meers, 2020). Existing form-led analysis has highlighted the critical role that forms play in filtering information in the welfare state, and how this can shape the choices that individuals make in the services that they apply for. To date, form-led analysis has tended to focus on the overall difficulty of applications, or the ways in which specific questions can constrain access to support (Meers, 2020).

This paper develops a typology to interpret the complexity present in different questions on a form. We show how the complexity of some questions can be linked to different forms of

administrative burden, and in turn, how the complexity embedded within questions can be different depending on individual's circumstances. This has implications for equity in access for those completing forms, which connects back to existing literature which identifies how application processes can be more suited to the middle class (Carey et al., 2021).

The value of understanding forms extends beyond understanding access to government services. Forms are often the mechanism through which the changes in our lives are recorded, such as in marriage or birth, and so represent a key feature of the relationship between the state and the citizen. For example, in outlining the significance of the paperwork he completed when his mother died, Graeber notes that 'without those forms, neither my mother, nor any of the other people cremated at his establishment, would be legally—and hence socially—dead' (Graeber, 2016, p. 50).

As such a critical mechanism of the relationship between individuals and the state, the completion of forms is of deep significance. Yet there is little literature on the complexity of forms, especially in relation to how individuals completing forms might perceive the difficulty of the specific questions being asked. However, it is often through individual questions that forms can become overly burdensome for individuals, as 'even when forms are complex, even bafflingly complex, it's by an endless accretion of very simple but apparently contradictory elements, like a maze composed entirely of endless juxtaposition of two or three very simple geometric motifs' (Graeber, 2016, p. 52).

In this way, seemingly simple questions on forms can escalate to make a form complex. Meers (2020) highlights this issue through the example of the restriction imposed on forms to access long-term social housing in the United Kingdom. Meers (2020) showed that a restricted set of possible options on a form resulted in people having less time in housing support than they were legally entitled to. In such cases, forms can represent a type of 'policymaking by other means' (Herd & Moynihan, 2019), where access to services or support is fettered despite the citizen having a legal entitlement to the service.

Questions can also be framed in ways that limit the ability of the person completing them to input their answer. This is often the case when the circumstances of a person do not directly align with the question which is being asked. For example, a person experiencing homelessness does not have a straightforward answer to a question about their residential or postal address. This means that they cannot provide the appropriate input to the form, and consequently cannot complete the form. We develop a novel typology to consider the inputs on forms, using the categories of *simple*, *notionally simple*, and *complex*.

4 | THE NATIONAL DISABILITY INSURANCE SCHEME

The NDIS was passed with bipartisan commitment in legislation in 2013, after a significant community campaign (Thill, 2015). Under the NDIS, approximately 500,000 individuals who have a significant and permanent disability will receive personalized funding budgets from which to buy services and supports that meet their needs (just under 10% of Australia's 4.4 million people with disability) (Collings et al., 2016; Productivity Commission, 2011). The goal is to give participants greater choice and control to people with disability.

Although sometimes characterised as universal, the NDIS is targeted in that eligibility is restricted to individuals who meet certain criteria, including age and level of impairment (Carey & McLoughlin, 2016). Targeted welfare programs introduce an added layer of complexity into application processes, because individuals must demonstrate that they meet the relevant

eligibility criteria. For governments, these criteria may enable a more rigorous assessment of eligibility, but they can reduce the transparency of eligibility for people who might wish to access support.

Previous research has highlighted that administrative complexity is a central feature of the NDIS (Carey et al., 2020; Commonwealth Government, 2020), with implications for equity within the scheme (Carey et al., 2021; Malbon et al., 2019). This is true in terms of both gaining access to the scheme as an applicant, and also in using the services available once a person gains access to the scheme; and there is already strong evidence that complexity of the NDIS system presents an issue for both participants and potential applicants (Dickinson et al., 2021).

Eligible individuals can apply to be an NDIS participant through the NDIA, which is the main administrator body for the scheme. Individuals must complete an 'access form' which details basic demographic details and disabilities experienced. Although the form may appear simple, it makes assumptions about people's circumstances (e.g. that they have access to internet, a stable home address, a mobile phone number) (NDIA, 2020). Along with this form, applicants must compile evidence from their health and medical practitioners, other service providers, and government agencies to build a case for eligibility. The application form for NDIS applicants is worthy of attention given that NDIS application outcome appeals are commonplace. In the 2019–2020 reporting period, 1780 outcome appeals were lodged, and in 65% of appeals, application decisions were changed (AAT, 2020). In the remainder of this paper, we focus our analysis explicitly on this first access form of the NDIS, how it contains burdens, and, as a result, how it can create inequities in accessing the scheme.

5 | THE COMPLEX LIVES OF NDIS APPLICANTS

Consideration of the additional layers of complexity facing NDIS applicants is relevant in consideration of NDIS form complexity. The NDIS does not provide data on homelessness, education levels, income, or employment for participants or applicants. However, to demonstrate the importance of some of the issues related to complex situations we highlight with the application, we identify the prevalence of people with disability among populations living in those complex situations.

In 2021, the Australian Digital Inclusion Index found that the national level of people experiencing high levels of digital exclusion was 11% (Thomas et al., 2021); among those 11%:

- 23% have a disability;
- 38% have not completed a secondary education;
- 31% are in the lowest income quintile;
- 21% are currently unemployed; and
- 22% are not in the labour force (Thomas et al., 2021, p. 5).

On the challenges of actually undertaking the reading and writing necessary to complete the form, currently in Australia 9.5% of people with a disability need assistance with reading or writing tasks (ABS, 2019), and there is evidence that receiving assistance with reading or writing is associated with obtaining the Disability Support Pension in Australia (Hong, 2019).

In relation to housing, 8.3% of people in Australia accessing Specialist Housing Services report a disability (AIHW, 2020) (this figure employs a definition of disability where a person needs assistance with some form of daily activity, meaning that it likely underestimates persons with

psychosocial forms of disability [Paterson, 2018]). Rates of homelessness for people with psychotic disorders nationally are at least 10 times higher than the general population based upon the National Survey for people living with psychosis (Paterson, 2018, p. 13).

6 | METHODOLOGY

The analysis of forms that govern access to social services is a small but growing area of research that this paper contributes to (for examples, see Cook, 2021a; Meers, 2020). In this study, we examine what the primary point of contact with the NDIS might look like for an applicant. We examine three key questions related to the form.

1. How complex is the form?
2. What level of administrative burden do applicants face?
3. What different types of administrative burden are present in the different sections of the form?

Commonly multiple forms of evidence are evaluated when undertaking component of document analysis. Depending on the type of document analysis conducted, there are also often a range of criteria through which documents are compared. For this study, one crucial document for accessing disability support in Australia is examined—the NDIS application form (NDIA, 2020). We explore a variety of different factors related to administrative burden within this one particular form. In doing so, we make a trade-off between the breadth of material covered to go into depth on analysing the specific challenges presented by individual questions on the form.

There are strong theoretical reasons for undertaking such a granular analysis. The first and most compelling is that the form itself represents a key feature of accessing support, without completing it applicants cannot be admitted into the scheme. The second reason is that although forms are often innocuous, they are a key mechanism that underpins the functioning of any welfare state (Herd & Moynihan, 2019). They are a critical site where the state collects information from citizens, and yet at the same time, their deeply impersonal nature and rigid structure means that they can be hard to complete for those with more complex lives. By focusing on one form, we can unpack very specific components, which provide wider insights about forms in general and how they can act as a barrier to access. Notably, by concentrating on just one form, it allows us to highlight just how many ways access to support can be constrained by a seemingly innocuous piece of the process. This also allows us to provide in-depth commentary on specific questions, which can be challenging to do in a more wide-ranging analysis.

For the analysis of the complexity within the form, we undertook an analysis of a single document, concentrating on the content of questions on the application. We evaluate the size of the application and the complexity of the different parts within it. Using a typology of question complexity which we created for this purpose, one researcher coded the questions into the categories, and this was reviewed by the two other researchers. There were no disagreements on the coding. The questions were coded into three categories:

1. **Simple:** There is only one possible answer for the question, and no ambiguity around the answer even for individuals with complex circumstances.
2. **Notionally simple:** In normal circumstances, the question only has one (simple) answer, but the complex circumstances of a person may mean that they cannot give a single straightforward answer.

3. **Complex:** The question is complex because it may have multiple answers for a person, and the parts they emphasise in their response depend on how they read the question.

An example of a *simple* question from the form is a person’s date of birth. Each person has only one date of birth.

Date of birth (DD/MM/YYYY)	
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A person’s residential address is an exemplar of the *notionally simple* category—most people have a single residential address which can be specified with the appropriate information, but for others, they might have none or multiple. There is no space to explain this on most forms, and so a person cannot input an appropriate answer to that question.

Current home address (include state and postcode)	
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An example of a *complex* question is:

Primary disability: (This is the disability that has the most impact on your daily life)	
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This question is complex, because many people with disability hold multiple diagnosis and it is open-ended what a person might describe as having the most impact on their daily life, and it is highly subjective how people might determine the impact that each disability has. Deciding on the disability to list as a primary disability is highly contingent on the evaluation that the individual completing the form makes, which shapes their input. A question that is complex can still have a straightforward answer for most people; the key point is that it might be complicated for some people.

Questions that are ambiguous in the content they are asking about can also shift from being *simple* or *notionally simple* into being *complex*. That ambiguity can also arise when definitions are not shared by everyone in the same way, especially when differences are cultural in nature. For example:

Do you have another family member who is, or is seeking to become, an NDIS participant?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, please provide their name:	

Because definitions of the family vary across society and cultures, a question about family members might be interpreted in different ways. It is unclear if a person should include their nephew on an application based upon this question. If everyone had the same conception of who counted as family, the answer to the question would be simple. But the interpretive aspect adds an additional layer of complexity to the question, and the person answering it must anticipate what the question is actually asking. This can result in the person being unsure which input to place onto the application.

There is extensive evidence that for many people living with a disability in Australia, their circumstances are complex (e.g. in relation to housing and accessing technology). Fitting those complexities into the form may represent a barrier to applying for the NDIS. We engage in a critical reading of this form based upon different strands of literature that has already identified that complexity. The typology enables us to highlight the ways in which the form may be more complex than a surface-level reading might suggest, and through this, the ways that the application process may be more challenging for individuals with complex circumstances. For example, a question about a person’s contact number may have a complex answer if they do not have a single point of phone contact.

In addition to the analysis of the complexity of the form, we also discuss the types of administrative burden present when undertaking the application. This is undertaken through the rubric of the three types of administrative burden identified by Moynihan et al. (2015) (i.e. learning costs, compliance costs, and psychological costs).

Our analysis looked at the overall form, covering the structure and length of the form, as well as a summary of the types of questions using the *simple*, *notionally simple*, and *complex* coding frame outlined above. We then looked at specific parts of the form, noting what each section requires and the ways in which the form may be more complex than it initially appears. Finally, we analysed the types of administrative burden present across the form. We identified the types of information required across the entire application, and then these were analysed for the presence of burden that would be experienced for applicants successfully submitting the application. Given the overall range of different types of burden that might be drawn out of the form, this section of the analysis should be treated as demonstrative rather than exhaustive. A copy of the NDIA Access Request form (NDIA, 2020)—the form we analyse—is supplied in Appendix A, and coding and analysis of the form is supplied in Appendix B.

7 | FINDINGS

7.1 | The overall form

Before looking at each section of the form in detail, we provide an overview of the form and its complexity as a whole. The application form is nine pages long, and contains eight separate sections. There are 41 questions that the applicants fill in. In addition to the questions that the applicant completes, there are 22 questions in the professional assessment section which can be completed by a health or education professional to support the application. The length of the application form is already a potential challenge for some people. This is especially true for individuals who might have a cognitive impairment, experience difficulty with reading, or who have a low level of literacy. This directly impacts the 9.5% of people with a disability need assistance with reading or writing tasks (ABS, 2019). This aligns with the *compliance cost* form of administrative burden, and is discussed below in more detail.

Because the form requires specific technical medical information in some parts, a potential applicant needs to read the form and comprehend what those requirements are. Understanding this terminology on the form can represent both a learning cost and a compliance cost. It is a learning cost because it requires additional learning to understand the specific requirements, and can be a compliance cost to complete this component of the form for those with complex circumstances.

Examining the share of questions which are notionally simple helps to understand the gap between the perceived difficulty of completing the form on the side of the form designer, and the experienced difficulty of completing the form by the applicant. As can be seen in Table 1, 39.0% of the form is notionally simple to complete, but for many may actually represent a complex answer. Instead of only 14.6% of the application being complex, more than half of the application (53.7%) has the potential to be complex for some applicants (see Appendix B for coding).

The category of notionally simple is particularly important. These questions are the sites where there may be a wide gap in perceived complexity between the person constructing the form, who might perceive only 14.6% of the form as complex, and the applicant who might find it significantly

TABLE 1 Questions as a share of application

Type	Number	Share of application
Simple	19	46.3%
Notionally simple	16	39.0%
Complex	6	14.6%
Total	41	100%

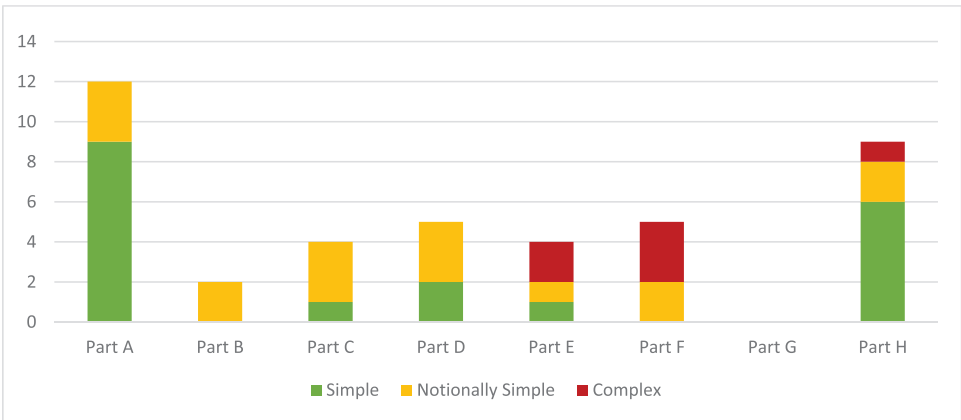


FIGURE 1 NDIS form sections by complexity. The form analysed in the paper is the NDIA Access Request Form (Version 8.1) (NDIA, 2020); the full form is available in Appendix A [Colour figure can be viewed at wileyonlinelibrary.com]

more complex (as high as 53.7%). This suggests that on top of being a long application form, there are additional layers of information that the applicant must process in order to complete the form.

7.2 | The individual sections on the form

In this section, we look at each individual section of the form in detail. There are eight sections to the application form, which deal with the personal details of the applicant, as well as their medical information.

Figure 1 shows the proportion of each section found to be simple, notionally simple or complex (see Appendix B for detailed coding). Part A, B, C, and D of the form only contain simple and notionally simple questions. Part E, F, and H of the form are on the whole more complicated; these sections of the application contain all of the questions coded as complex (part G has no questions).

7.2.1 | Part A

Part A contains 12 questions related to the basic personal and contact details of the applicant. Most of this part of the form is simple to answer, with questions like name and date of birth only

having a single answer. Of the 12 questions in this section, nine were coded as simple, and three as notionally simple.

In this section, the three questions related to the applicant’s home and postal address have the potential to be complex for applicants who have complicated housing situations:

Current home address (include state and postcode)	
Postal address (include state and postcode)	<input type="checkbox"/> As above <i>If different to current home address:</i>

The structure of these questions assumes that the applicant has stable housing, and that it is easy for the applicant to clearly state their address. For those with complex housing arrangements, it is not possible to write on the form that they may have multiple addresses or no stable address. Yet many Australians with a disability are either homeless or at risk of homelessness (Paterson, 2018). For those with complex housing situations, receiving mail can be an issue, and although later in the form there is an option for how the NDIA can best contact the participant, applicants should be able to flag issues with their postal address when they provide this response.

7.2.2 | Part B

Part B contains two questions about the applicant giving consent for their information being collected by the NDIA and being used in the application. It also asks about the information being used as part of the process to implement an NDIS plan if the applicant is successful. Both questions are coded as notionally simple, because providing the consent requires the applicant to check a box that denotes understanding about the privacy implications of lodging their application. There are two reasons that they can be considered to have some issues that might be more complex. The first is in relation to understanding where an applicant’s data might be given, and the second relates to understanding how an NDIS plan is constructed.

Part B: Your privacy and consent to collect and share your information

The National Disability Insurance Agency (NDIA) collects personal information to help us determine whether you can access the NDIS. As a participant, the NDIA will also collect and use your information to help develop and implement your NDIS Plan and do other things related to the NDIS.

In addition to collecting certain information from you, we may contact your service providers, health and medical practitioners and other government agencies to request the provision of personal and health information about you which will help us to determine whether you meet the access requirements for the NDIS and, if so, to provide supports to you under the NDIS.

If you live in Shared Supported Accommodation, (e.g. a home shared with other people with disabilities that includes shared support from paid staff), we may also disclose your personal information to personnel employed within the group home to enable the Agency to collect further personal information about you in order to support the development of your NDIS plan if you become a participant.

Please note that if you do not consent to the collection of your personal information, the NDIA may not be in a position to determine whether you meet the access requirements for the NDIS or develop your NDIS Plan if you become a participant. More information about the collection, use, disclosure and storage of your personal information by the NDIA can be accessed on our online Privacy Notice and Privacy Policy at www.ndis.gov.au/privacy or by contacting the NDIA.

Do you consent to the NDIA collecting your information including from these third parties, for the purposes of determining whether you meet the access requirements for the NDIS and to help develop or implement your NDIS Plan if you become a participant?	<input type="checkbox"/> Yes, I consent OR <input type="checkbox"/> No, I do not consent.
The Australian Government Department of Human Services (including Centrelink and Medicare)	<input type="checkbox"/> Yes, I consent My CRN is: <input type="text"/> OR <input type="checkbox"/> No, I do not consent. I will provide the information myself.
How would you like us to contact you?	<input type="checkbox"/> Home phone (insert number): <input type="text"/> TTY (if applicable): <input type="text"/> <input type="checkbox"/> Mobile phone (insert number): <input type="text"/> <input type="checkbox"/> Email (insert address): <input type="text"/>

There is a link on the digital version of the application form to a longer discussion of the privacy policy for applicants, which lists the reasons the NDIS might disclose participant data to third parties. Reading and understanding the specific legal aspects of the privacy policy represents a form of learning burden.

On a more practical level, there is an issue with consenting to information being used to develop and implement an applicant’s NDIS plan. Specifically, the participant needs to properly understand the process through which the plan is constructed, and how that information might be used as part of the process.

7.2.3 | Part C

Part C contains four questions related to the applicant’s preferences for how the NDIA can contact the applicant. Only one of these four questions was coded as simple (if the applicant needed the support of an interpreter), with the other three questions being coded notionally simple.

Does the person require assistance with self-management because of their disability? <input type="checkbox"/> No , does not need assistance	<input type="checkbox"/> Yes , needs special equipment <input type="checkbox"/> Yes , needs assistive technology <input type="checkbox"/> Yes , needs assistance from other persons: (physical assistance, guidance, supervision or prompting)
If yes, please describe the type of assistance required:	

The range of options is sufficient for those in straightforward circumstances, but for those which are more complex, it becomes more difficult to specify which is the ‘best’ option, as all may present some form of challenge. Each has a certain requirement of stability and/or access. Applicants need to have a phone number—this requires the resources to maintain a stable phone number. Email requires access to the internet, and regular access to ensure that the applicant can check their emails for any correspondence. As mentioned above, any letters require a stable postal address, which may not be the case for those with complicated housing situations.

7.2.4 | Part D

Part D contains five questions related to if the applicant has a parent, legal guardian, or representative. The three questions coded as notionally simple again are challenging for those who lack stability.

7.2.5 | Part E

Part E relates to the applicant’s carers and family members and their contact number. A question which may seem simple for designers (a contact number) is potentially more complex when an applicant has multiple carers (e.g. parents who have separated) or limited access to a phone.

The question about whether your carer will be taking part in the planning conversation is complex as the carer may have a role in helping the applicant prepare for the planning conversation without being present. Alternatively, the applicant may have multiple carers, and may wish to have them all present.

7.2.6 | Part F

Part F relates to the applicant’s disability or need for early intervention support that the applicant must complete themselves. The final question requires the applicant to either ask a professional to provide an assessment that summarises their level of impairment or to provide evidence of their disability based upon ‘25 different’ types of tests or assessment that the applicant may have previously undertaken (there is an additional option to submit extra documentation under a cat-

egory titled other, although it is unclear what types of assessment or test that the applicant could submit under this label). Knowing which health professionals to use, gaining access to them, and covering cost for assessments are all administratively burdensome.

7.2.7 | Part H

Part H deals with the legal obligations a person is undertaking by submitting the application. We have coded the section as containing six simple questions, two notionally simple questions, and one complex question. However, on a different reading there is an inherent degree of complexity in asking questions of a legal nature for any individual, especially with regard to obligations under the law, as truly understanding issues of a legal nature requires some knowledge of how the law operates in practice.

The questions in this section are simple in the way that they ask the applicant—for example ‘I understand that giving false or misleading information is a serious offence’—but the answer to these questions is actually very complex. First of all, in cases where an applicant has attempted to simplify complex information, there is the potential for that simplification to be judged as ‘misleading’. Secondly, to fully understand this obligation the applicant (and the person helping them with their application) needs to know and understand the legal application of the term *false or misleading information*.

8 | DISCUSSION

Our analysis of the application form highlights the overall complexity of the NDIS application form, and the challenges individuals might have in being able to correctly input the required information. In this section, we return to Herd and Moynihan’s three types of administrative burden and discuss the degrees to which they are present across different types of questions.

Table 2 provides a short summary of the conceptual relationship between types of burden and question complexity. This is a summary in line with the theoretical relationships between the different types of burden and questions, and there are exceptions to the summaries provided. However, in general, these are helpful ways to think about the prevalence of burden across the types of questions, and align with the questions on the form we have analysed. For example, there is minimal learning burden associated with supplying a date of birth or a phone number. The challenge for supplying a phone number may be more around not having one rather than understanding what is being asked (i.e. around *compliance burden* rather than *learning burden*).

8.1 | Learning based burden

Like the application for any government support payment, there are some basic requirements that fit under the category of learning-based burden. The applicant must first find out about the existence of the scheme, and evidence shows that knowledge about the scheme itself is socially stratified (Cortese et al., 2021; Hui et al., 2018). After finding out about the NDIS, they must then make at least a preliminary determination that they might be eligible for the scheme. To do this, they must learn some basic facts about who is eligible for the NDIS and ensure that they at least might meet those criteria. After they make that determination, they must then work out how they might start the process of applying for the scheme. Evidence suggests that knowledge about the NDIS, whether a person might be eligible, and the application process varies considerably across different segments of the population, with some evidence from NDIS service providers

TABLE 2 Types of burden and question complexity

Type of burden	Simple	Notionally Simple	Complex
Learning	Generally simple questions align with things like personal details so applicants tend to understand and know this information before commencing an application.	The challenge in answering notionally simple questions is not usually from learning-based burden. People will mostly understand what they are being asked. It is only through trying to work out or identify solutions people will experience learning burden.	Complex questions have a high degree of learning-related burden associated with them given that they are often highly interpretive. Often a core part of providing a favourable response is tied to learning the correct way to frame a response.
Compliance	Compliance burden related to individual simple questions is generally low. They become burdensome through the volume that is present on a form.	Compliance can be a significant issue for notionally simple questions because a person's circumstances may limit their ability to provide an answer on the form (i.e., comply with its request for information).	Answering complex questions on a form can be challenging to comply with given that they can ask about more detailed situations which are hard to summarise. Supporting those answers can also require detailed evidence and this can produce compliance burden.
Psychological	There is minimal psychological burden created by simple questions, these are questions that are straightforward to answer and do not ask open personal questions	The added complexity in a person's circumstances that shifts a simple question into the notionally simple category means that they have a higher potential to produce psychological burden.	Because complex questions rely heavily on how individuals position themselves, and require a high degree of performance in line with the question, they have a higher potential to produce psychological burden through the way people are made to positions themselves.

suggesting that there were issues with the accessibility of information for families from culturally or linguistically diverse communities (Cortese et al., 2021; Hui et al., 2018; Purcal et al., 2018, p. 16).

In terms of question complexity, a core requirement for successfully completing the application is for the applicant to familiarise themselves with the relevant categories on the form and the questions which they must answer. At least 16 are notionally simple, but have the potential to be complex for an applicant to respond to. Satisfactorily answering these questions requires the applicant to either have a neat answer or to attempt to come up with a workaround solution to place as an answer on the form—and it is at this point the learning-based burdens can transition into compliance-based burdens (discussed below). Notably though, the challenge in notionally simple questions is in how they can be answered, not in understanding what is being asked.

8.2 | Compliance-based burden

The most prevalent form of administrative burden present in the NDIS application form is the compliance-based burden. Compliance-based burden is present in the form in a number of differ-

ent ways. As noted above, the most basic manner is the overall length of the form. Completing the application form is not a small undertaking, with a minimum of 41 different questions to respond to for an application to be completed, as well as the collection of medical evidence to support the application.

The application form requests a high volume of supporting documentation. These include submitting documentation related to the various assessments of disability or reports in relation to a person's disability, with 25 specific documents being listed, and an open option of 'Other'. Although the applicant is not required to submit each assessment, they must determine which of the 25 documents are relevant to them and any additional documentation they should submit through the open category of Other. If the applicant can navigate this part of the form, obtaining the required evidence can be challenging and can often have financial costs (Dickinson et al., 2021, p. 17). The applicant is also reliant on a health professional to provide *supportive* information on the application (i.e. information that will help meet the compliance burdens). Other research has found that this documentation also needs to highlight the needs of the applicant on their worst, rather than best, day, if they're going to gain access and appropriate supports (Mavromaras et al., 2018; Warr et al., 2017). For applicants with multiple conditions, or with complex diagnoses that are continuing to evolve over time, this can impact their applications. For example, in a recent study an NDIS recipient discussing issues with their application noted how they 'had several learning disabilities e.g. audio processing, dyslexia, anxiety but not until ASD was diagnosed did we get any help' (Dickinson et al., 2021, p. 17). Notably, the burdens associated with these issues are not equally distributed, nor is the capacity to meet them, and for some applicants they will need a strong support network to help them complete their application (Christensen et al., 2020).

As is highlighted above through the discussion of various potentially complex dimensions to the form, there is a degree of assumed stability that applicants need in order to respond to some questions. This can be understood as a type of compliance burden, as it is a necessary prerequisite to comply with the requirements of the application. This is where the notionally simple category helps to identify the increased levels of compliance burden present for applicants with more complex lives.

8.3 | Psychological-based burden

Finally, there are also psychological-based burdens for applicants. These psychological-based burdens relate to how the applicant must position themselves within the form. These are particularly prominent in complex questions, which often involve a deeper interpretive element around how an individual positions themselves.

A central part of the application involves the applicant demonstrating the level of need that they have for assistance. This positions the applicant in a deficit model of disability (Carter et al., 2015), where they are required to perform their needs for support. Although the scheme does exist to provide support for people in need, there needs to be an understanding that there can be issues with applicants being made to *perform* their disability: in particular, to perform it as a source of negative impact in their life, and as a source of *stable* negative impact. Deficit models of disability are known to be harmful to individuals (Carter et al., 2015).

The application has an underlying assumption about consistency (both in lived circumstances and disability-related needs). The assumption of uniformity of the experience of a disability is a significant issue in the application, for example:

Released by the NDIA on
By
NDIA Office:



Access Request Form

Complete this form to request to become a participant in the National Disability Insurance Scheme (NDIS). You must provide proof of age, residence (including citizenship or visa status) and disability (or your need for early intervention supports) with this Access Request Form. We cannot make a decision on your access request without this information.

If you have questions about this form, need help to complete it or would like more information about the NDIS, please contact us:

Phone: 1800 800 110

TTY: 1800 555 677

Speak and Listen: 1800 555 727

Internet Relay: Visit <http://relayservice.gov.au> and ask for 1800 800 110

Email: NAT@ndis.gov.au

Please return the completed form to:

Mail: GPO Box 700, Canberra, ACT 2601

Email: NAT@ndis.gov.au or

In person: take it to your local NDIA office

Here, there is no scope for the person to respond that they are able to cope on a good day, but may need assistance on a bad day. This is important when considered in conjunction with an expectation of performativity of disability and of negative performativity in particular. Strengths-based approaches to disability highlight the benefits to individuals who position themselves in a positive light and try to understand themselves as independent and capable (Carter et al., 2015). The application form demands that they do the opposite to receive the support that they are entitled to. In that sense, the application encourages the applicant to see themselves through (damaging) a deficit lens. Moreover, if things go wrong with the form (i.e. an application is rejected) the overall complexity of the form can make it unclear why the application was unsuccessful. This issue reflects longer trends where accessibility to schemes for people with complex needs can be opaque, and therefore hard for people to contest outcomes that they think are unfair (Cowan & Halliday, 2003).

Overall, using the framework for coding question complexity developed in this paper highlights how the potential complexity of the NDIS access form for individuals who must complete it far exceeds what those who designed it may anticipate. These increased levels of complexity can be a barrier to completing the form, and thus represent a potential barrier to accessing the NDIS. Notably, these points of complexity and potential barriers are not distributed equally among the population, and so the form centres the experiences and needs of the middle and upper class. Previous work has highlighted that this is a feature of personalisation approaches to service delivery, which also tend to provide outcomes that most benefit the middle class through the way that it is centred around their skills and experiences (Carey et al., 2019).

The issues related to variability in complexity raised by our proposed framework are consistent with emerging work on the privileging of the skills of the middle class in access to welfare services (Matthews & Hastings, 2013). Matthews and Hastings (Hastings & Matthews, 2015; Matthews & Hastings, 2013) argue that middle-class use of social services, and activism from these users, shapes social services to be tailored specifically for middle-class users. Where advocacy for users from lower classes is missing, it is less likely for services to meet those users' needs.

Elsewhere Carey et al. (2019) have observed that the design of personalisation schemes such as the NDIS privileges access to those in the middle class who are best able to navigate complex bureaucracy and withstand the administrative burden of application and maintenance of social support (Carey et al., 2021). Carey et al. (2019, p. 170) describe the NDIS as 'a system designed by and for those with the skills imparted by formal education and location in the middle-classes' (p. 170). In many cases, the notionally simple category is simple for the middle classes where their answers fit neatly into the question being asked, whereas for other groups with more complex lives, this category is actually complex. Furthermore, the learning, compliance, and psychological burdens present within the NDIS application form are likely to exceed in complexity beyond the expectations of the form designers. This provides an illustrative example of the ways in which the NDIS has been designed by the middle class, for the middle class.

More broadly, our analysis shows just how many burdens can be contained in a single form. Although administrative burden is often assessed or discussed as a 'whole of system' issue, our analysis demonstrates that significant burdens and barriers to access can exist at the individual level. This opens up discussion and analysis of single pieces of bureaucratic technology, and their impact on citizens, and equity.

9 | CONCLUSION

The relative innocuousness of forms means that they can slip under the radar, but they are a central part of the welfare state. Indeed, the form we have analysed is a critical part of a system that resulted in 1780 appeals related to application outcomes over just 1 year (AAT, 2020). There were likely outcomes for others that were not appealed or applications that went unsubmitted because people were unable to complete the application form.

As the concept of administrative burden makes clear, some forms are easier than others to complete. As complexity in a form grows, it can produce administrative burden. In this paper, we presented a framework for evaluating question complexity that can limit capacity to input answers into forms. Our analysis has highlighted the potential for notionally simple questions to actually require complex negotiation by citizens. We have highlighted that the ability to answer these questions is also connected to social inequality; those with more complex disadvantage are more likely to find it difficult to complete the form and be successful in their application. Critically, an unsuccessful outcome may not be tied to a citizen's eligibility for the program, rather their inability to successfully complete a form which does not make space for their lived experience and circumstances.

Although this paper has focused on the significance of just one form—the NDIS Access Request Form—it raises the importance of other forms in our lives and as mechanisms for administrative burden and exclusion. Many of the issues we have identified here are directly present in other forms to access social services, as well as the other forms that make up the fabric of our society, and we welcome the use of our framework in the analysis of other forms. One space that future research should examine in particular is the relationship between question complexity on application forms and the different types of administrative burden they produce.

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APPENDIX A

APPLICATION FORM

The form analysed in the paper is the NDIA Access Request Form (Version 8.1) (NDIA, 2020). See below for the full form:

Part A: Your details (the person wishing to become an NDIS participant)

Full name	
Date of birth (DD/MM/YYYY)	
Gender	<input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Unspecified
Are you of Aboriginal or Torres Strait Islander origin?	<input type="checkbox"/> No <input type="checkbox"/> Yes – Aboriginal <input type="checkbox"/> Yes – Torres Strait Islander <input type="checkbox"/> Yes – Aboriginal and Torres Strait Islander <input type="checkbox"/> Do not wish to disclose
Country of birth	
Language spoken at home	
Are you living in Australia permanently?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Current home address (include state and postcode)	
Postal address (include state and postcode)	<input type="checkbox"/> As above <i>If different to current home address:</i>
For Western Australia or Northern Territory only: What was your home address on 1 July 2014?	<input type="checkbox"/> Same as current home address above <i>If different to current home address:</i>
Are you an Australian Citizen?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If NO, what type of visa do you have?	<input type="checkbox"/> Permanent visa <input type="checkbox"/> Protected special category visa <input type="checkbox"/> Other including temporary visa (<i>please specify below</i>) Visa Type: <input type="text"/> Nationality: <input type="text"/> Passport Number: <input type="text"/>

Part B: Your privacy and consent to collect and share your information

The National Disability Insurance Agency (NDIA) collects personal information to help us determine whether you can access the NDIS. As a participant, the NDIA will also collect and use your information to help develop and implement your NDIS Plan and do other things related to the NDIS.

In addition to collecting certain information from you, we may contact your service providers, health and medical practitioners and other government agencies to request the provision of personal and health information about you which will help us to determine whether you meet the access requirements for the NDIS and, if so, to provide supports to you under the NDIS.

If you live in Shared Supported Accommodation, (e.g. a home shared with other people with disabilities that includes shared support from paid staff), we may also disclose your personal information to personnel employed within the group home to enable the Agency to collect further personal information about you in order to support the development of your NDIS plan if you become a participant.

Please note that if you do not consent to the collection of your personal information, the NDIA may not be in a position to determine whether you meet the access requirements for the NDIS or develop your NDIS Plan if you become a participant. More information about the collection, use, disclosure and storage of your personal information by the NDIA can be accessed on our online Privacy Notice and Privacy Policy at www.ndis.gov.au/privacy or by contacting the NDIA.

Do you consent to the NDIA collecting your information including from these third parties, for the purposes of determining whether you meet the access requirements for the NDIS and to help develop or implement your NDIS Plan if you become a participant?

☐ Yes, I consent

OR

☐ No, I do not consent.

You can give us consent to obtain information about your age, disability, and residence from Centrelink (below) or you can provide us with certified copies of the required documents yourself.

We cannot make a decision without this information.

**The Australian Government
Department of Human Services
(including Centrelink and Medicare)**

☐ Yes, I consent

My CRN is:

OR

☐ No, I do not consent.

I will provide the information myself.

Part C: How would you like the NDIA to contact you?

How would you like us to contact you?	<input type="checkbox"/> Home phone (insert number): TTY (if applicable): <input type="checkbox"/> Mobile phone (insert number): <input type="checkbox"/> Email (insert address):
How would you like to receive letters?	<input type="checkbox"/> Email <input type="checkbox"/> Post
Do you need an interpreter to help us talk with you?	<input type="checkbox"/> No <input type="checkbox"/> Yes If yes, specify language:
<input type="checkbox"/> Do not contact me directly. Instead, contact:	<input type="checkbox"/> My parent/legal guardian or representative (Part D) <input type="checkbox"/> Other (please specify):

Part D: Parent, legal guardian or representative details (if applicable)

Complete this section if you are filling out this form for:

- a person aged under 18 for whom you have parental responsibility, OR
- a person for whom you are a representative or a legal guardian.

You do not need to complete this section if you are just helping the person fill out this form.

NOTE: If you are a legally appointed guardian, you will need to provide your Proof of Identity (POI) and guardianship status to the NDIA. This information can be verified through the Australian Department of Human Services (Centrelink) using the CRN provided on page 2 (if applicable) or you can provide copies of two POI documents (or a 'Government issued photo card') and the guardianship document with this form.

Full name	
Relationship to person making request	
Phone (include TTY if applicable)	
How would you like to receive letters?	<input type="checkbox"/> Email Email address: <input type="checkbox"/> Post <input type="checkbox"/> Same address as person making request If different address, please provide details:
Do you need an interpreter?	<input type="checkbox"/> No <input type="checkbox"/> Yes If yes, specify language:

Personal-In-Confidence when complete OFFICIAL DOCUMENT—DO NOT COPY

Page 4 of 9

ARF: V 8.1 – 8 April 2020

Part E: Information about your carers and family members (if applicable)

Carer's full name	
Contact phone number (include TTY if applicable)	
Will your carer be taking part in the planning conversation?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you have another family member who is, or is seeking to become, an NDIS participant?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please provide their name:

Part F: Your disability, or need for early intervention supports

So we can determine whether you (or your child) meet the disability or early intervention access requirements (including developmental delay), you need to provide us with information about your disability or impairment.

Primary disability: (This is the disability that has the most impact on your daily life)	
Please list other disabilities (if any):	
Did you acquire your disability because of an injury?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are you seeking, or have you previously sought compensation related to your disability or injury?	<input type="checkbox"/> Yes <input type="checkbox"/> No

If you have undertaken one or more of the following assessments or reports in relation to your disability, please provide a copy with your Access Request Form.

- The Care and Needs Scale (CANS)
- Vineland Adaptive Behaviour Scales, 2nd Ed (Vineland-II)
- Diagnostic and Statistical Manual of Mental Disorders, 5th Ed (DSM-5) – Autism Spectrum Disorder
- Diagnostic and Statistical Manual of Mental Disorders, 4th Ed (DSM-4) – Autism Spectrum Disorder
- Childhood Autism Rating Scale (CARS)
- Adaptive Behaviour Assessment System (ABAS)
- Autism Diagnostic Observation Schedule (ADOS)
- Gross Motor Functional Classification Scale (GMFCS)
- Communication Function Classification Score (CFCS)
- Manual Ability Classification System (MACS)
- Diagnostic and Statistical Manual of Mental Disorders, 5th Ed (DSM-5) – Intellectual Disability
- Diagnostic and Statistical Manual of Mental Disorders, 4th Ed (DSM-4) – Intellectual Disability
- Clinical Evaluation of Language Fundamentals, 4th Ed
- Wechsler Preschool and Primary Scale of Intelligence, 3rd Ed (WPPSI-III)
- Wechsler Intelligence Scale for Children (WISC-IV)
- IQ test

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ARF: V 8.1 – 8 April 2020

Page 5 of 9

- Hearing Loss (Measured in decibels in better ear)
- Disease Steps
- Expanded Disability Status Scale
- Level of lesion
- ASIA Score
- Modified Rankin Scale
- Visual acuity level
- Visual field loss (horizontal and vertical)
- World Health Organisation Disability Assessment Schedule (WHODAS 2.0)
- Other

We need supporting information about your disability and the impact it has on your mobility, communication, social interaction, learning, self-care and/or ability to self-manage.

You can do this by:

☐ Providing us with copies of reports, letters or assessments from your health or education professional detailing your (or your child's) impairment and the impact it is has on daily life
OR

☐ By asking a professional to complete the section below:

Full name of professional (health or education)	
Professional qualification	
Phone	
Email	
Length of time you have known or treated the person making request?	
Primary disability and any secondary disabilities:	
Current treatment (if any):	
Is there any other treatment that is likely to remedy the impairment?	<input type="checkbox"/> Yes <input type="checkbox"/> No

1. Mobility/motor skills

Moving around the home (crawling/walking), getting in or out of bed or a chair, leaving the home and moving about in the community

Note: Assistance required does not include commonly used items such as glasses, walking sticks, non-slip bath mats, bathroom grab rails and hand rails installed at stairs

Does the person require assistance to be mobile because of their disability? <input type="checkbox"/> No, does not need assistance	<input type="checkbox"/> Yes, needs special equipment <input type="checkbox"/> Yes, needs assistive technology <input type="checkbox"/> Yes, needs assistance from other persons: (physical assistance, guidance, supervision or prompting)
If yes, please describe the type of assistance required:	

2. Communication

Being understood in spoken, written or sign language, understanding others and express needs and wants by gesture, speech or context appropriate for age

Does the person require assistance to communicate effectively because of their disability? <input type="checkbox"/> No, does not need assistance	<input type="checkbox"/> Yes, needs special equipment <input type="checkbox"/> Yes, needs assistive technology <input type="checkbox"/> Yes, needs assistance from other persons: (physical assistance, guidance, supervision or prompting)
If yes, please describe the type of assistance required:	

3. Social Interaction

Making and keeping friends, interacting with the community (or playing with other children), coping with feelings and emotions

Does the person require assistance to interact socially because of their disability? <input type="checkbox"/> No, does not need assistance	<input type="checkbox"/> Yes, needs special equipment <input type="checkbox"/> Yes, needs assistive technology <input type="checkbox"/> Yes, needs assistance from other persons: (physical assistance, guidance, supervision or prompting)
If yes, please describe the type of social interaction assistance required:	

4. Learning

Understanding and remembering information, learning new things, practising and using new skills

Does the person require assistance to learn effectively because of their disability? <input type="checkbox"/> No, does not need assistance	<input type="checkbox"/> Yes, needs special equipment <input type="checkbox"/> Yes, needs assistive technology <input type="checkbox"/> Yes, needs assistance from other persons: (physical assistance, guidance, supervision or prompting)
If yes, please describe the type of assistance required:	

5. Self-Care

Showering/ bathing, dressing, eating toileting, caring for own health (not applicable for children under two years of age)

Note: Assistance required does not include commonly used items such as non-slip bath mats, bathroom grab rails and hand rails installed at stairs

Does the person require assistance with self-care because of their disability? <input type="checkbox"/> No, does not need assistance	<input type="checkbox"/> Yes, needs equipment/ assistive technology <input type="checkbox"/> Yes, needs assistance from another person in the areas of: <input type="checkbox"/> showering/bathing <input type="checkbox"/> eating/drinking <input type="checkbox"/> overnight care (e.g. turning) <input type="checkbox"/> toileting <input type="checkbox"/> dressing
If yes, please describe the type of assistance required:	

6. Self-Management

Doing daily jobs, making decisions and handling problems and money (not applicable for children under 8 years of age)

Does the person require assistance with self-management because of their disability? <input type="checkbox"/> No, does not need assistance	<input type="checkbox"/> Yes, needs special equipment <input type="checkbox"/> Yes, needs assistive technology <input type="checkbox"/> Yes, needs assistance from other persons: (physical assistance, guidance, supervision or prompting)
If yes, please describe the type of assistance required:	
Signature of Professional	
Date	

Part G: Change of circumstances

The law requires you to tell the NDIA if a change of circumstances happens (or is likely to happen) that might affect your request to be a participant in the NDIS or, if you become a participant, that might affect your status as a participant or your NDIS Plan.

For example, you must tell us if your disability support needs change, you move house or overseas, or receive compensation relating to an injury.

You must tell us as soon as you reasonably can. You can do this in person, over the telephone or by letter, email or fax.

Part H: Signature

When I sign this Access Request Form:

- I certify that the information I have provided is true and correct and that I have given all of the information and documents that I have or can get that are required by this Access Request Form.
- I understand that giving false or misleading information is a serious offence.
- I understand that I am giving consent for the NDIA to do the things with my information set out in Part B and with the people I have indicated in Part D. I understand that I can withdraw my consent for the NDIA to do things with my information at any time by letting the NDIA know.
- I understand that I can access the NDIA's Privacy Notice and Privacy Policy on the NDIA website or by contacting the NDIA.
- I understand that if I have selected email under Part C as my preferred means of communication, that the NDIA may email me sensitive or confidential information. I understand that the NDIA cannot guarantee the security of the email once it leaves the NDIA system.
- I understand that my access to the following Commonwealth programs will cease (if applicable) if I become a participant in the NDIS:
 - Helping Children with Autism and Better Start
 - Mobility Allowance

Signature:

Date:

Full Name (please print):

If you have signed this Access Request Form on behalf of the person wishing to become an NDIS participant, please complete the details below. It is an offence to provide false or misleading information.

Full name of person completing this form (please print):

Relationship to person wishing to become an NDIS participant:

We may require you to provide evidence of your authority to sign on behalf of the person.

Question	Simple	Notionally Simple	Complex
PART A: Your Details			
Full Name	x		
Date of Birth	x		
Gender	x		
Are you of Aboriginal or Torres Strait Islander origin?	x		
Country of birth	x		
Language spoken at home	x		
Are you living in Australia permanently?	x		
Current home address (include state and postcode)		x	
Postal address (include state and postcode)		x	
For Western Australia or Northern Territory only: What was your home address on 1 July 2014?		x	
Are you an Australian Citizen?	x		
If NO, what type of visa do you have?	x		
PART B: Your privacy and consent to collect and share your information			
Do you consent to the NDIA collecting your information including from these third parties, for the purposes of determining whether you meet the access requirements for the NDIS and to help develop or implement your NDIS Plan if you become a participant?		x	
You can give us consent to obtain information about your age, disability, and residence from Centrelink (below) or you can provide us with certified copies of the required documents yourself. We cannot make a decision without this information: The Australian Government Department of Human Services (including Centrelink and Medicare)		x	
PART C: How you would like the NDIA to contact you			
How would you like us to contact you?		x	
How would you like to receive letters?		x	
Do you need an interpreter to help us talk with you?	x		
Do not contact me directly. Instead, contact:		x	
PART D: Parent, legal guardian or representative details (if applicable)			
Full name	x		
Relationship to person making request		x	
Phone (include TTY if applicable)		x	
How would you like to receive letters?		x	
Do you need an interpreter?	x		
PART E: information about your carer's and family members			
Carer's full name	x		
Contact phone number (include TTY if applicable)		x	

APPENDIX B

CODING OF FORM

The form coded and used in the paper is the NDIA Access Request Form (Version 8.1) (NDIA, 2020). The full coding is included below in Table 3.

TABLE 3 Coding of form

Question	Simple	Notionally simple	Complex
Part A: Your details			
Full name	×		
Date of birth	×		
Gender	×		
Are you of Aboriginal or Torres Strait Islander origin?	×		
Country of birth	×		
Language spoken at home	×		
Are you living in Australia permanently?	×		
Current home address (include state and postcode)		×	
Postal address (include state and postcode)		×	
For Western Australia or Northern Territory only: What was your home address on 1 July 2014?		×	
Are you an Australian Citizen?	×		
If NO, what type of visa do you have?	×		
Part B: Your privacy and consent to collect and share your information			
Do you consent to the NDIA collecting your information including from these third parties, for the purposes of determining whether you meet the access requirements for the NDIS and to help develop or implement your NDIS Plan if you become a participant?		×	
You can give us consent to obtain information about your age, disability, and residence from Centrelink (below) or you can provide us with certified copies of the required documents yourself. We cannot make a decision without this information: The Australian Government Department of Human Services (including Centrelink and Medicare)		×	
Part C: How you would like the NDIA to contact you			
How would you like us to contact you?		×	
How would you like to receive letters?		×	
Do you need an interpreter to help us talk with you?	×		
Do not contact me directly. Instead, contact:		×	
Part D: Parent, legal guardian, or representative details (if applicable)			
Full name	×		
Relationship to person making request		×	
Phone (include TTY if applicable)		×	
How would you like to receive letters?		×	
Do you need an interpreter?	×		
Part E: information about your carer's and family members			
Carer's full name	×		

(Continues)

TABLE 3 (Continued)

Question	Simple	Notionally simple	Complex
Contact phone number (include TTY if applicable)		×	
Will your carer be taking part in the planning conversation?			×
Do you have another family member who is, or is seeking to become, an NDIS participant?			×
Part F: Your disability or need for early intervention supports			
Primary disability: (This is the disability that has the most impact on your daily life)			×
Please list other disabilities (if any):			×
Did you acquire your disability because of an injury?			×
Are you seeking, or have you previously sought compensation related to your disability or injury?		×	
We need supporting information about your disability and the impact it has on your mobility, communication, social interaction, learning, self-care and/or ability to self-manage. You can do this by: Providing us with copies of reports, letters or assessments from your health or education professional detailing your (or your child's) impairment and the impact it is has on daily life; OR, By asking a professional to complete the section below:		×	
Part H: Signature			
When I sign this Access Request Form:			
I certify that the information I have provided is true and correct and that I have given all of the information and documents that I have or can get that are required by this Access Request Form.	×		
I understand that giving false or misleading information is a serious offence.	×		
I understand that I am giving consent for the NDIA to do the things with my information set out in Part B and with the people I have indicated in Part D. I understand that I can withdraw my consent for the NDIA to do things with my information at any time by letting the NDIA know.		×	
I understand that I can access the NDIA's Privacy Notice and Privacy Policy on the NDIA website or by contacting the NDIA.		×	
I understand that if I have selected email under Part C as my preferred means of communication, that the NDIA may email me sensitive or confidential information. I understand that the NDIA cannot guarantee the security of the email once it leaves the NDIA system.	×		

(Continues)

TABLE 3 (Continued)

Question	Simple	Notionally simple	Complex
I understand that my access to the following Commonwealth programs will cease (if applicable) if I become a participant in the NDIS: Helping Children with Autism and Better Start; Mobility Allowance			×
Signature	×		
Date	×		
Full name	×		
Total	19	16	6