

Progress notes that pass an *NDIS* audit

What's changing in 2026, why your notes are now the evidence the NDIA actually sees, the failures that have cost providers millions — and a one-page checklist for your next note.



What's changing — and why it lands on your notes

2026 is the biggest change in NDIS provider regulation since the Scheme began. Three of those changes turn everyday progress notes from "admin" into your most important evidence.

01

Registration is becoming mandatory — starting with SIL

From **1 July 2026**, supported independent living (SIL) and platform providers must be registered with the NDIS Commission to keep delivering those supports — with an apply-by cut-off around **1 October 2026**. From 2027 this expands to personal care and daily-living supports, aiming for ~90% of providers registered (up from ~6% today).

Why it matters for notes: registration means certified audits against the Practice Standards — and an auditor builds their view of quality largely from your records. Your notes are the sample they read.

02

The NDIA is about to see your evidence

Today the agency has direct visibility over the evidence behind only ~10% of claims. A new digital-payments model is being introduced to connect each claim to the support that justifies it.

Why it matters for notes: every claim increasingly needs a note that justifies it on its face — the right support, the right duration, linked to a funded goal.

03

Audits now look for outcomes, not just paperwork

The shift most providers underestimate: auditors have moved to **outcomes-based evidence**. Tidy policies and a full folder of notes are no longer enough — you have to show the support is making a difference to the participant's goals.

Why it matters for notes: "what we did" is no longer the finish line. The strongest notes show what *changed*.

From activity to outcomes

If you take one thing from this guide: an auditor in 2026 is asking a harder question than "did the support happen?" They're asking "*is it working — and can you show me?*"

They build their picture from four places — your documents, your records, what they observe in the service, and what your workers and participants say. Your notes sit at the centre of three of those four. When all four agree, you pass. When your notes say less than your workers do out loud, that's a finding.

The 2026 test for a progress note: does it **link the support to a plan goal, justify the claim, and show movement toward that goal** (or a deliberate change of approach)? If yes, it's audit-ready. If it only records activity, it's a risk.



Where this is heading: documentation health at a glance — by worker, participant and service — so issues surface before an auditor finds them.

What the courts are actually penalising

The NDIS Commission now takes providers to the Federal Court — and the penalties have climbed fast. Read past the headline figures and a pattern emerges: in case after case, the failures the Court names are **risk-management, record-keeping and incident-reporting** failures.

\$2.5M

Lifestyle Solutions (Aust) Pty Ltd

Federal Court · Nov 2025 · record penalty to date

Violence and abuse went unmanaged in a SIL home. The provider admitted **96** NDIS Act breaches — and **1,811** breaches of the Reportable Incident Rules for not notifying serious incidents in time.

The lesson: \$500,000 of the penalty was for incident-reporting failures alone. Recording and escalating incidents on time *is* the obligation.

\$2.2M

Aurora Community Care Pty Ltd

Federal Court · Oct 2025 · death of a participant

Penalised following the death of participant Ankur Gupta. The Court found failures in identifying and managing risk and in delivering safe, appropriate supports — at the time, the highest penalty handed to a provider.

The lesson: courts treat risk that is not assessed, recorded and acted on as a breach in its own right — not just an unlucky outcome.

\$1.8M

LiveBetter Services Ltd

Federal Court · Apr 2024 · death of Kyah Lucas

After the death of Kyah Lucas, a 28-year-old Indigenous woman, the provider admitted **17** contraventions — including no formal risk assessment of the home before bathing supports, and no recorded worker training or competency checks.

The lesson: "we did train them" is only as strong as the record of it. Undocumented competency was treated as no competency.

~\$1.9M

Valmar Support Services Ltd

Federal Court · in relation to a participant's death

One of several seven-figure penalties imposed where the Commission alleged a provider failed to deliver supports safely and to meet its obligations to a participant.

The lesson: seven-figure penalties are no longer rare or reserved for the largest providers — the trend is up.

~200

providers & individuals banned via the
Fraud Fusion Taskforce

660

investigations underway; dozens
referred to court

2,500+

providers disrupted for incorrect or
non-compliant claims

Penalty amounts, dates and findings are summarised from publicly reported NDIS Quality and Safeguards Commission media releases and Federal Court outcomes; figures are approximate and may be subject to appeal. Shared here respectfully and for general awareness of regulatory direction — not as legal advice, and not to suggest any single tool would have changed these outcomes.



7 things that make a note fail an audit

1

It records activity, not outcomes against a goal

"Took James to the shops" proves nothing about why, which funded support, or which goal. Tie every note to the support purpose and the goal it advances — and note the result.

2

It's vague or subjective

"Had a good day" is an opinion. "Prepared lunch with one verbal prompt, then washed up independently" is evidence. Write what you observed, specifically.

3

It can't stand alone

A note that leans on what the regular team "just knows" fails when a stranger — the auditor — reads it cold. Date, time, duration, who was present, what was delivered, and the outcome all belong on the page.

4

The support claimed doesn't match the support recorded

If the claim says two hours of community access but the note reads like 40 minutes at home, that's a clawback risk — and an easier one to spot as claim-level visibility increases.

5

Incidents and risks are buried — or the loop isn't closed

Auditors want the full cycle: the incident, the response, the investigation, and the change in practice. Recording the event but not the learning — or reporting it late — is a common, avoidable, and now expensive finding.

6

It's late, unsigned, or edited without a trail

Notes written days later, or without a clear author and time, lose evidentiary weight. Same-shift entries with a clean audit trail are far stronger.

7

It uses the wrong kind of language

Labels and judgements ("manipulative", "attention-seeking") are red flags. Use respectful, person-first, behaviour-based descriptions.

The anatomy of an audit-ready note

Every strong note answers six questions. A missing one is exactly where your risk sits.



Context

Date, time, duration, location, who was present — the support is real and verifiable.



Purpose

The funded support and the plan goal it serves — reasonable, necessary, goal-linked.



What you did

The specific support delivered — so the claim matches the activity.



What you observed

Factual, objective detail — the participant's response and any change.



Outcome / progress

Movement toward the goal — the 2026 focus.



Actions / follow-up

Risks, escalations, next steps — duty of care and continuity.

Before & after (synthetic example — no real participant data)

BEFORE — RAISES QUESTIONS

"Saw Sam today. Good session. Went out for a bit and got some things done. Bit tired after."

AFTER — AUDIT-READY

"14/03/2026, 10:00-12:00, community access (2 hrs), supporting Sam's goal to build independence in daily living. Travelled by bus to the shops; Sam chose items from a written list and paid with one verbal prompt (down from three last week). Calm throughout; no incidents. Outcome: growing independence with money handling. Next: practise self-checkout. Recorded same shift."



● IF YOU DELIVER SIL

The four new SIL Practice Standards

Alongside mandatory registration, the Commission has introduced a new SIL module — four standards SIL providers will be audited against, layered on the existing Core Module. In draft they cover:

- **Supported decision-making** — evidence participants are genuinely supported to make their own choices.
- **Safeguarding** — how risks in shared accommodation are identified, recorded and acted on.
- **Practice governance** — oversight of frontline practice and quality, not just policies on a shelf.
- **Agreements** — clarity about tenancy, housing and support arrangements.

All four are evidenced, in large part, through day-to-day records — decisions supported, risks noted and escalated, practice reviewed. Good notes are how you demonstrate them.

● IN PLAIN ENGLISH

What documentation auditors check

- **Person-centred & goal-linked** — support connects to the participant's goals and choices.
- **Safe** — risks, incidents and restrictive practices identified, recorded and escalated, loop closed.
- **Accountable** — a clear, contemporaneous, attributable record that justifies the claim.
- **Consistent** — the whole team documents to the same standard, so quality doesn't depend on who's on shift.

Consistency is the quiet one. A single great note doesn't pass an audit — a representative *sample* does. The goal is a floor every worker clears, every time.

What NDIScribe does

NDIScribe is purpose-built for the NDIS, and it works where the record is made. Every note is checked against the Practice Standards *as it's written* — so it's right before it's saved, not discovered months later by an auditor. Here's what it does — from the moment of capture to a paid claim.



Note Copilot

A worker speaks or types what happened — on their phone, in any of 12 languages — and Note Copilot turns it into a clean, objective, structured progress note. The best evidence is captured in the moment, not reconstructed days later.



Audit Lens

Scores every note against the NDIS Practice Standards and shows, in plain language, exactly what's missing — the goal link, the outcome, the claim justification — before anyone signs off. In 2026 your notes are the evidence an auditor reads first.



The AI Advocate

Reviews a note and explains what would strengthen it — and answers plain-English questions about the Practice Standards and your own records with cited guidance, so every worker knows what good evidence looks like without trawling PDFs.



Reportable-incident clock

Logs incidents and runs the 24-hour and 5-day reporting clocks, escalating automatically. Late or unrecorded incidents drove a large share of recent penalties — this is how a team stays ahead of them.



Family updates

Turns a week of de-identified shift notes into a warm, clear weekly update email for a participant's family — so the people who care are kept in the loop, with privacy protected by default.



Claims that get paid

Checks that the support recorded justifies what's billed and catches claim errors *before* they reach PRODA — so payments hold up as the NDIA moves to connecting every claim to its evidence.



Documentation health, live

A dashboard of documentation quality by worker, participant and service — so gaps and risks surface for you and your managers before an auditor ever finds them.



One standard, whole team

Every worker, every shift, every language clears the same bar. Quality stops depending on who's on shift — which is exactly what an auditor's representative sample tests.



Built for the NDIS — and the 2026 bar

Plenty of tools store notes. The audit risk is in what those notes *say* — and that is the problem NDIScribe was built to solve, end to end.

- 1 Purpose-built for the NDIS — not a generic notes app.** Designed around the Practice Standards and Code of Conduct, in NDIS language, for NDIS audits. Hosted only in Australia, with privacy treated as a first-order requirement.
- 2 Prevention, not a post-mortem.** Quality is checked at the moment of writing, so problems are fixed in seconds — not found in a quarterly file review, or by an auditor.
- 3 Made for outcomes-based audits.** NDIScribe scores for the goal link and the outcome the 2026 standards demand — not just whether a field is filled in.
- 4 The failures that cost providers, caught early.** Late or unrecorded incidents drove a large share of recent penalties. NDIScribe helps surface reportable incidents and close the loop, on time.
- 5 Works alongside what you already run.** Keep your CRM or roster — Lumary, ShiftCare and the like. NDIScribe strengthens the record itself; it isn't a rip-and-replace.
- 6 One system, web and mobile.** Capture on the phone at the point of support; review and manage quality from the desktop — the same standard everywhere.

Notes that pass audits, claims that get paid, and an AI Advocate for every participant — **built only for the NDIS, hosted only in Australia.**

● USE THIS TODAY

Your audit-ready note checklist

Run a note past this before it's saved. Tick every box and it will stand up.

- ☐ Date, time, duration and location are recorded
- ☐ The funded support and the plan goal it serves are clear
- ☐ The activity recorded justifies the support being claimed
- ☐ It's specific and factual — an outsider could follow it
- ☐ It describes the participant's response and any change
- ☐ It shows movement toward the goal — or a considered adjustment
- ☐ Any incident or risk is recorded, escalated, and the loop closed
- ☐ Language is respectful, person-first, free of labels
- ☐ Written same-shift, attributed to an author, with a clean trail
- ☐ No information included that isn't needed for the support record



Want every note checked against this, as it's written?

That's NDIScribe — Note Copilot, Audit Lens and the AI Advocate, working together so every progress note is audit-ready the moment it's written, and every claim is one you can stand behind. Book a demo and we'll show you how it works on real NDIS notes — exactly where each one stands against the Practice Standards, and how your whole team gets to audit-ready by default.

[Book a demo →](#)

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General information about documentation practice, current as of mid-2026; not legal, clinical or compliance advice. Registration dates, penalties and the final Practice Standards are set by the NDIS Quality and Safeguards Commission and may change — confirm at ndiscommission.gov.au and with your approved quality auditor. NDIScribe helps you produce audit-ready records; it does not remove a provider's responsibilities or guarantee any audit outcome. © 2026 NDIScribe.