



**NCCD**  
NATIONALLY CONSISTENT COLLECTION OF DATA  
ON SCHOOL STUDENTS WITH DISABILITY



# Imputing disability for the NCCD

Advice document | August 2021



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# Purpose of this document

The purpose of this document is to provide guidance to schools on decision-making for the inclusion of students with undiagnosed disability in the Nationally Consistent Collection of Data on School Students with Disability (NCCD).

This document should be used in conjunction with the current [NCCD Guidelines](#)<sup>1</sup>.

Questions about specific cases should be referred to the relevant [key contact](#)<sup>2</sup> within each education authority as listed on the NCCD Portal.

For students with diagnosed disability, schools should follow the NCCD Guidelines, rather than the guidance in this document.

## 1. Introduction

The NCCD assists schools to support all students with disability and to improve student outcomes, even if there is no formal diagnosis of disability.

The NCCD requires schools to count those students with disability where their condition has a functional impact on their ability to participate in schooling on the same basis as their peers, and who are receiving adjustment(s) to access education because of disability.

Where the disability does not have a functional impact on the student's ability to participate in learning, the student is not included in the NCCD. The NCCD does not count every student who is protected from discrimination under the *Disability Discrimination Act 1992* (DDA).

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<sup>1</sup> <https://www.nccd.edu.au/tools/nccd-guidelines-0>

<sup>2</sup> <https://www.nccd.edu.au/help-and-support/key-contacts>

## 2. Imputing disability for the NCCD

A proportion of students included in the NCCD have formal diagnoses of disability supported by medical or allied health professionals' diagnostic reports. However, there are cases where a student's disability has not been formally diagnosed and a school team 'imputes' disability for the purposes of the NCCD.

### What does 'imputing' disability mean for the NCCD?

A school team will impute disability when it believes, based on **reasonable grounds** and **supported by documented evidence**, that **undiagnosed disability is having a functional impact on the student's capacity to access and participate in education** on the same basis as their peers.

**Imputing disability is not equivalent to diagnosing disability.** School teams may impute disability based on the DDA definitions and, for the purposes of the NCCD, describe the disability in terms of the four broad categories: physical, cognitive, sensory or social/emotional. While the school team may identify characteristics of disability, a diagnosis can only be made by qualified medical or allied health professionals. School teams should take care to avoid labelling characteristics with a specific diagnosis.

If an educational adjustment(s) is made for a student with imputed disability they may meet the conditions for inclusion in the NCCD where:

- the student has been counted in the school's Census for the relevant year; and
- the student's impairment meets the DDA's definition of disability; and
- the student has been provided with an adjustment(s) for a minimum of 10 weeks of school education in the 12 months preceding Census Day<sup>3</sup> to address the functional impact of a disability; and
- the school holds supporting evidence collated over the relevant year including:
  - assessed individual needs
  - adjustment(s) provided
  - ongoing monitoring and review of the adjustment(s)
  - consultation with the student and/or parents, guardians or carers, or associates.

In this case, the **student with imputed disability must be included in the school's NCCD process on the same grounds as students with diagnosed disability.**

More information on the [legislation underpinning the NCCD](#)<sup>4</sup> is available on the NCCD Portal.

### 2.1 Why is a school team required to impute disability for the NCCD?

The NCCD Guidelines require schools to include all students who meet the NCCD criteria in the annual Census, this includes students for whom a school team imputes disability.

The decision to impute disability is important. Professional discussions within school teams, examination and moderation of evidence collated and the testing of assumptions ensure that the criteria used to reach a decision to impute disability are shared, agreed upon and supported with evidence.

<sup>3</sup> **Census Day** is the date on which schools identify the student population to count for the Schooling Census, which includes the NCCD.

<sup>4</sup> <https://www.nccd.edu.au/wider-support-materials/what-underpinning-legislation?parent=%2Funderstanding-nccd&activity=%2Fwider-support-materials%2Fwhat-nccd&step=0>

Failure to report all students who meet NCCD criteria in the annual Census may impact the Australian Government's accurate calculation of the student with disability loading for a school for that year.

The composition of a school team may vary and could include members external to the school staff, including specialist advisers, consulting teachers and allied health professionals engaged by the school's employing authority.

## 2.2 When would a school team impute disability for the NCCD?

A school team may impute disability at any time based on evidence held by the school and the adjustment(s) they provide in consultation with the student (or their associate) and parents, guardians or carers. The decision to impute disability should be made well in advance of the final reporting period in August. This is because the discussions and decisions on providing an educational adjustment(s) should occur throughout the school year, as per the NCCD model.

### Check with your school authority

Your school authority may have policies or procedures in regard to imputing disability. Please check with your school principal or the [NCCD key contact](#)<sup>5</sup> for your education authority before commencing your NCCD processes.

## 3. How does a school team impute that a student has disability for the NCCD?

To impute disability, the school team must have **reasonable grounds**, supported by evidence, to make such a judgement. The evidence demonstrates that the student's needs for adjustment(s) have been identified and arise from characteristics of disability.

Evidence may be drawn from a range of sources including, but not limited to, documents such as the student's personalised or individualised learning plan or behaviour management plan. The existence of these plans does not automatically equate to a student presenting with disability. However, they may provide indicators of imputed disability when they document the teaching and educational adjustment(s) made so that the student can access and participate in the learning on the same basis as their peers.

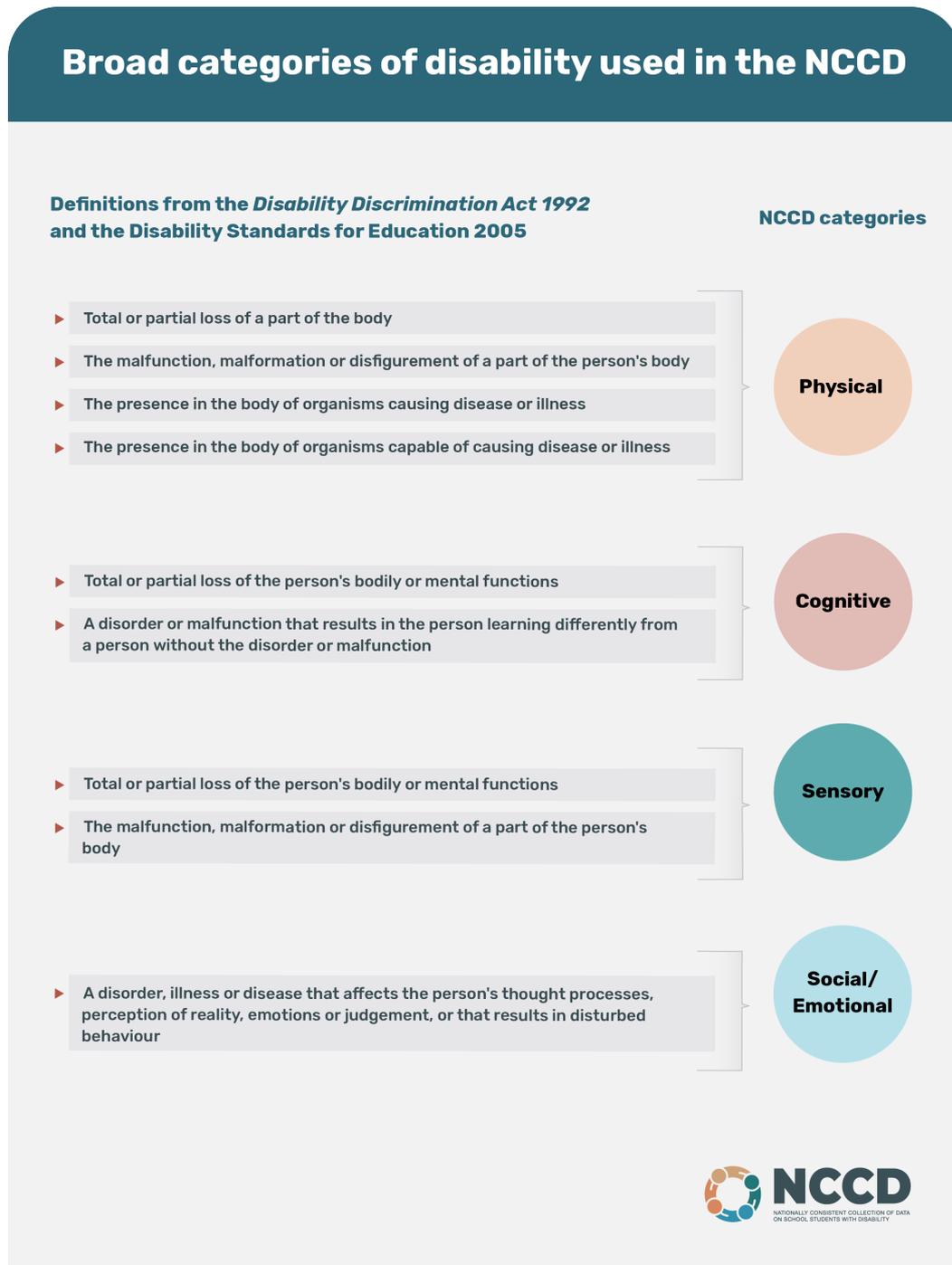
More information on [evidence requirements](#)<sup>6</sup> is available on the NCCD Portal.

<sup>5</sup> <https://www.nccd.edu.au/help-and-support/key-contacts>

<sup>6</sup> <https://www.nccd.edu.au/wider-support-materials/what-evidence-nccd-based-upon>

### 3.1 Does the student have imputed disability that is defined under the DDA and described under the NCCD broad categories of disability?

The DDA (Section 4) definitions of disability align broadly to the NCCD categories of disability as follows.



[PDF version of this infographic<sup>7</sup>](#) can be found on the NCCD Portal.

<sup>7</sup> [https://www.nccd.edu.au/sites/default/files/categories\\_of\\_disability.pdf](https://www.nccd.edu.au/sites/default/files/categories_of_disability.pdf)

Some students are affected by multiple disability categories, both diagnosed and imputed. NCCD reporting requires schools to identify which disability category has the greatest impact on the student's education and is the main driver of adjustment(s) to support the student's access to and participation in education.

### Does the student have disability?

It can be challenging for school teams to identify the underlying drivers that determine whether the school is providing adjustment(s) to a student due to disability or in response to other external factors or circumstances. Factors such as social disadvantage, family disruption, linguistic background or ineffective instruction do not necessarily equate to disability.

A good test of your confidence in the judgement is to ask, 'If we were challenged to explain our decision would we feel we had reasonable grounds and documentation to support our judgement?'

## 3.2 Has the student (or their associate) and their parents, guardians or carers been consulted?

The Disability Standards for Education 2005 require that a school **must** consult with the student or an associate of the student (their representative) before providing reasonable adjustment(s) to address identified concerns.

The NCCD Guidelines recommend that schools should consult with parents, guardians or carers before making an adjustment(s), where possible. Students and their families have valuable knowledge and experience that can assist education staff to make good decisions including:

- observations of the student's access, participation and achievement at school that supports imputed disability
- knowing what is challenging for the student at school and what would assist their participation
- historical or current diagnostic information from allied health professionals
- additional evidence of disability that would impact the student's learning including assessments or reports provided from previous schools.

Consultation may be challenging, particularly if family members do not wish to participate in discussions or are sensitive to the suggestion that their child has a disability. When preparing for these conversations, highlight the student's strengths and how the school will build upon these strengths.

Consider the following:

- Who is best placed to lead the discussion, and who will participate? For example, a classroom teacher may have the closest relationship with the family and provide a familiar bridge for less familiar participants such as a learning support teacher or specialist.
- Can the student or their associate be included in the discussion to offer first-hand information?
- Focus on the needs of the student and the functional impact the imputed disability has on their participation and learning.
- Highlight the positive impact of any educational adjustment(s) and illustrate how they would be reasonable and effective.
- Focus on the long-term outcomes for the student.
- Include any evidence that supports the decision to impute disability.
- Clarify that the school team is not providing a diagnosis and, if appropriate, encourage them to consult with a qualified practitioner.

- Clarify the obligations of the school under the Standards and clarify the role of the NCCD, the type of data collected and how it is used.

Schools should be sensitive to cultural differences and the needs of families when communicating about disability. If consultation is not possible, or where parents, guardians or carers refuse to accept imputed disability, the NCCD Guidelines are clear that the school must proceed to impute disability if reasonable grounds exist and the student meets the NCCD criteria.

Schools must document evidence of consultation with parents, guardians or carers – or provide evidence of attempts to consult, or documented reasons for not doing so.

#### Useful information for parents

- [NCCD fact sheet<sup>8</sup>](#) (translated into a range of languages)
- [Disability Standards for Education: A practical guide for individuals, families and carers<sup>9</sup>](#)

#### Useful resources for teachers

- [Communicate with students, parents, guardians and carers<sup>10</sup>](#)

### 3.3 Is the adjustment(s) provided attributable to disability or the result of factors other than disability?

Students encounter challenges at school for a broad range of reasons, from the short-term impacts to sustained and long-term adjustment(s) due to disability. The key to imputing disability for the NCCD is to first determine why the adjustment(s) are being provided and if they are directly attributable to support for imputed disability.

The presence of disability, diagnosed or imputed, does not automatically imply that the student is included in the NCCD. The NCCD counts students receiving educational adjustment(s) for a cognitive, physical, sensory or social/emotional condition that has a **functional impact on the student's access and participation in education**.

The following questions may be helpful when the school team is determining whether to impute disability. They are not to be considered as essential criteria, but may contribute to the decision-making process.

#### School-based data and/or observations

- Do you have school-based data showing that the student is not achieving outcomes consistent with the range of achievement for their age group, despite receiving, at a minimum, quality differentiated teaching practice?
- Is the student's growth in literacy and/or numeracy significantly or substantially below expectations for a student of that age or stage of development? Have you ruled out other external factors that may account for this discrepancy, for example, extended period of absence?
- Does the student's level of literacy and/or numeracy have a functional impact on their ability to participate in learning on the same basis as their peers?
- Does the student have significant difficulty understanding or using language in different conditions that might suggest oral language or hearing concerns?
- Does the student present with visual difficulties, for example, find near (or far) work difficult to see, or obscure a part of their vision in order to focus and concentrate better?

<sup>8</sup> <https://www.nccd.edu.au/tools/fact-sheet-parents-guardians-and-carers>

<sup>9</sup> <https://www.nccd.edu.au/for-parents-guardians-and-carers>

<sup>10</sup> <https://www.nccd.edu.au/wider-support-materials/communicate-students-parents-guardians-and-carers>

- Is the student's hearing or vision inconsistent throughout the day?
- Does the school team have evidence that the student may be presenting with signs of an underlying social/emotional disability that is having a functional impact on their learning?

#### **Consultation with others**

- Has the student and their associate, or parents, guardians or carers, disclosed that they suspect the student may have a disability?
- Has the student's schooling history provided any evidence of adjustment(s) to address the functional impact of imputed disability?
- Has the student been unwell for an extended period of time with a condition that has a functional impact on their learning? Has the student scheduled or attended medical appointments, but a diagnosis has not yet been determined?

#### **Intervention**

- Has the student participated in an evidence-based intervention for at least 10 weeks and not made progress that would be expected of a child of that age/stage of development?
- Has the student required ongoing support from the school wellbeing team/counsellor/psychologist/community based mental health service for at least 10 weeks in the last 12 months of schooling?
- Has the student received support from an external provider, resulting in the collaborative identification of adjustment(s) to be implemented by the school team, but with no diagnosis made at the time of collection?
- Is there supporting evidence from school-based ongoing monitoring and review of student achievement?

#### **Other**

- Has the school team discounted other external factors that may necessitate the provision of educational adjustment(s) but are not disability related? These could include targeted learning programs for students for whom English is an additional language or dialect (EAL/D), absenteeism, transience, external factors such as family disturbance and neglect, or environmental events such as bushfires.

### **3.4 When a school team might impute disability**

Although this is not an exhaustive list, these are some common circumstances where a school team might impute disability.

- The school has evidence that the student requires educational adjustment(s) arising from disability but a formal diagnostic process has not been undertaken.
- There is new presentation of disability that is only beginning to have a functional impact on learning, for example, a degenerative condition or social/emotional challenges.
- The student is experiencing persistent and ongoing learning difficulties and the school is not yet sure if this is due to an underlying specific learning disorder. Lack of progress cannot be attributed to other factors, for example, teaching quality or ad hoc, as opposed to targeted, intervention.
- The student has been unwell for an extended period but medical specialists have not yet been able to determine the cause.
- Limited opportunities to access qualified specialists have meant that there has been no diagnosis.
- The student's parents, guardians or carers are unable to, or have chosen not to, seek a diagnosis for the child.

### 3.5 When a school team might not impute disability

There are some circumstances where a school will make an adjustment(s) to support a student without disability. Based on these circumstances alone, a student would not be included in the NCCD, despite the school making adjustment(s) to support their learning.

- English as an additional language or dialect (EAL/D)
- Refugee background
- Absenteeism or school refusal
- Environmental impacts (for example, family disruption, natural disasters)
- Bullying
- Neglect
- Being a carer
- Out-of-home care
- Transience
- Temporary incapacity for less than 10 weeks (for example broken limb) or remediation after a period of illness
- Ineffective instruction
- Challenging behaviours not related to disability
- Socio-economic
- Cultural disadvantage

**In situations where these circumstances result in imputed disability, the school's evidence must clearly relate to the imputed disability, not the circumstance.**

## 4. Do you have sufficient evidence that the adjustment(s) identified is designed to support the identified category of disability?

The same documented evidence identified in [Examples of evidence to support a student's inclusion in the NCCD](#)<sup>11</sup> is required for **all** students who are included in the NCCD, whether they have a formal diagnosis or their disability has been imputed<sup>12</sup>.

The evidence will reflect a wide range of practices in schools to support the educational needs of students. Each school's evidence will be contextual and reflect individual student needs and the school's learning and support processes and practices. The school should collect evidence over time to determine that the student has an imputed disability. This includes evidence in **the four general areas**:

- assessed individual needs of the student
- adjustment(s) being provided to the student to address their learning needs associated with disability – this includes support provided within quality differentiated practice
- ongoing monitoring and review of the adjustment(s)
- consultation and collaboration with the student/their associate and/or parents, guardians or carers.

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<sup>11</sup> <https://www.nccd.edu.au/tools/examples-evidence-support-students-inclusion-nccd>

<sup>12</sup> <https://www.nccd.edu.au/tools/examples-evidence-support-students-inclusion-nccd>

Evidence collected for a student with imputed disability may include the following.

- Results of summative school and/or standardised assessments, collected over an extended period, documenting an ongoing learning or socio-emotional need arising from disability, for example:
  - records of behaviour incidents
  - reading assessments
  - numeracy assessments
  - end of unit assessments
  - diagnostic or early detection screening tests
  - progress data
  - rating scales (completed by parent/carer/guardian, teacher and/or student or their associate)
- Documentation showing limited student response to targeted intervention over time, for example:
  - school-based observations/assessments
  - notes from parent/carer/guardian meetings or interviews
  - notes from student/associate interviews
- Parental observations and reports
- Reports that identify the functional needs of a student due to disability, for example:
  - personalised/individualised learning plans
  - behaviour support plan
  - safety plans
  - health plans
  - risk assessments

School teams may consider recording evidence using the [student summary](#)<sup>13</sup> template available on the NCCD Portal.

## 5. Case studies on the NCCD Portal

A collection of student case studies illustrating examples of [imputed disability](#)<sup>14</sup> aligned to the NCCD process is available on the NCCD Portal.

The [case study professional learning](#)<sup>15</sup> modules are recommended for school team members new to the NCCD process. These modules guide educators through making decisions in regard to the NCCD process based on case studies that include imputed disability cases.

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<sup>13</sup> <https://www.nccd.edu.au/tools/student-summary-sheet>

<sup>14</sup> <https://www.nccd.edu.au/resources-and-tools/case-studies/topics/imputed-disability-27>

<sup>15</sup> <https://www.nccd.edu.au/resources-and-tools/professional-learning>

## 6. Next steps

When school teams are satisfied that they have reasonable grounds and documented evidence to include a student with imputed disability in the NCCD, they should proceed with the [NCCD process](#)<sup>16</sup> as they would for students with diagnosed disability.

School teams should refer to their school authority about procedures to escalate issues of concern relating to the wellbeing or access to education for students with disability.

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<sup>16</sup> <https://www.nccd.edu.au/process>

## 7. Frequently asked questions

### **How much data and/or evidence does a school need when making the decision to impute disability?**

The requirement to provide evidence for imputed disability is the same as for diagnosed disability. School systems deploy a range of tools to assist school teams to record and manage evidence. The NCCD Portal provides some optional [evidence templates](#)<sup>17</sup>.

### **Does the school team need to determine what disability the student is likely to have?**

No, only qualified medical or allied health professionals diagnose disability. School teams are required, however, to impute disability that aligns to an NCCD category of disability.

### **What if we get it wrong?**

Unlike a formal diagnosis, in imputing disability, school teams are only expected to reach an informed conclusion that is reasonable and supported by evidence. A moderation process, guided professional dialogue based on evidence, ensures decisions in relation to whether to include a student in the NCCD are consistent, reliable and defensible.

It is expected that schools ensure that team members have completed appropriate professional learning and are supported by the principal who has final approval on the decisions made by the team.

### **Once a school team has determined that a student has imputed disability, are they automatically included in the NCCD?**

No. In order for a student to be included in the NCCD, the disability must have a functional impact on the student's access and participation in learning that has led to the school providing documented educational adjustment(s) for a minimum of 10 weeks of school education in the 12 months preceding Census Day.

### **Will the school team need to impute a student's disability annually?**

Ideally, imputing disability will lead to a formal diagnosis. If not, disability can be imputed over several years. However, as individual needs and the functional impact of disability can change over time, the decision to include the student must be reviewed each year.

Key considerations when undertaking an annual review include:

- Has the student received a diagnosis since disability was imputed?
- Is there ongoing sufficient evidence of the imputed disability?
- Does the student require educational adjustment(s) at the same level previously identified?
- Does the evidence collected support the same category of disability?

A school may consider their role in supporting a formal diagnostic process when:

- they are concerned for a student's ongoing welfare
- there is a legal requirement to do so, for example, subject to mandatory reporting
- they are seeking special provisions for external examinations.

### **If the student has a personalised or individualised learning plan and receives adjustment(s) to support their learning, are they automatically included in the NCCD?**

No. Students receive adjustment(s) for various reasons that are articulated in individual plans. Only documented educational adjustment(s) that can be attributed directly to disability and meet all of the NCCD criteria can be counted as evidence for inclusion in the NCCD.

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<sup>17</sup> <https://www.nccd.edu.au/tools/nccd-evidence-templates>

### **Should a student be included in the NCCD if the student’s parents, guardians or carers do not agree that the student has disability?**

While agreement between all parties is optimal, the NCCD Guidelines require schools to count all students with disability or imputed disability regardless of the agreement of parents, guardians or carers.

### **What happens if the school team imputes more than one category of disability?**

For the purpose of the NCCD, schools are required to identify one category of disability only. This is the category for which the student has received the most significant adjustment(s) over a 10-week period in the last 12 months to address the functional impact of their disability. For example, if a student is imputed with social/emotional and cognitive disabilities but the school provides the majority of adjustment(s) to support the cognitive disability, the student would be categorised in the cognitive category for the NCCD.

### **If the school hasn’t provided adjustment(s) to a student due to their disability, for 10 weeks in the 12 months preceding Census Day, does it mean the school team can’t impute disability?**

The 10-week rule is a requirement for including a student in the NCCD. A school team cannot include the student in the NCCD unless they have evidence of 10 weeks of adjustment(s) in the 12 months preceding Census Day.

### **Where can school teams find information or advice on imputing disability or the NCCD process?**

The NCCD Portal provides a range of information to support school teams including the following:

- [NCCD Guidelines](#)<sup>18</sup>
- The [NCCD model](#)<sup>19</sup> including information on categories of disability, levels of adjustment and evidence
- [NCCD case studies](#)<sup>20</sup> including cases of [imputed disability](#)<sup>21</sup>
- Self-paced [professional learning modules](#)<sup>22</sup> on the *Disability Discrimination Act 1992*, the Disability Standards for Education 2005 and teacher judgement
- Resources for [parents, guardians and carers](#)<sup>23</sup>
- [Key contacts](#)<sup>24</sup>: government and non-government education authorities

### **Are there any key dates I need to be aware of when imputing disability for the NCCD?**

Yes, the key dates are the same for all students included in the NCCD. Data for students with imputed disability are reported as part of the standard NCCD process. National key dates are published on the [Portal home page](#)<sup>25</sup> and schools are advised to consult with their education authority for schedules within their state or territory.

### **Is imputed disability treated the same as diagnosed disability for the purpose of State, Territory and Commonwealth assurance activities?**

Yes, the evidence requirements for imputed disability and diagnosed disability are the same. Assurance activities verify the numbers of reported students with disability based on supporting documentation held at schools. These activities will aim to ensure the school has kept the evidence required under the NCCD Guidelines.

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<sup>18</sup> <https://www.nccd.edu.au/tools/nccd-guidelines-0>

<sup>19</sup> <https://www.nccd.edu.au/understanding-nccd>

<sup>20</sup> <https://www.nccd.edu.au/resources-and-tools/case-studies/>

<sup>21</sup> <https://www.nccd.edu.au/resources-and-tools/case-studies/topics/imputed-disability-27>

<sup>22</sup> <https://www.nccd.edu.au/resources-and-tools/professional-learning>

<sup>23</sup> <https://www.nccd.edu.au/for-parents-guardians-and-carers>

<sup>24</sup> <https://www.nccd.edu.au/help-and-support/key-contacts>

<sup>25</sup> <https://www.nccd.edu.au/>