# National Disability Insurance Scheme

**Application for a review of a reviewable decision**

This form can be:

* Downloaded from the [NDIS Website](https://www.ndis.gov.au/participants/reasonable-and-necessary-supports/decision-review/application-review-reviewable-decision.html) and lodged in person, by mail or email to [enquiries@ndis.gov.au](mailto:enquiries@ndis.gov.au)
* Completed by a National Disability Insurance Agency (NDIA) officer at your local office, over the phone or in-person

# Part A – Applicant information

The NDIS Act states some NDIA decisions can be reviewed. These are known as

*Reviewable Decisions*.

A list of NDIA reviewable decisions are listed in Appendix 1 at the end of this form. They include, for example:

* NDIS access
* The funding and provision of reasonable and necessary supports
* Nominee appointments
* Parental responsibility recognition.

Providers may seek a review of a decision not to register them or a decision to revoke their registration.

A person may request a review if they are directly affected by an NDIA decision.

The request for review must be made within three months of receiving the reviewable decision notice.

A request for review may be made by:

1. sending or delivering a written request to the NDIA; or
2. making an oral request, in person or by telephone or other means, to the NDIA.
3. completing and lodging this form in person, by mail or email to [enquiries@ndis.gov.au](mailto:feedback@ndis.gov.au)

# Part B – About You

|  |  |
| --- | --- |
| Name: | [full\_name] |
| Mr/Ms/Miss/Mrs: | [title] |
| Participant number:  (for participants) | [ndis\_number] |
| Address: | [address] |
| Home contact number: | [home\_phone\_number] |
| Work contact number: | [mobile\_phone\_number] |
| Mobile: | [mobile\_phone\_number] |
| TTY: | N/A |
| Email: | [email\_address] |

### Preference for contact (circle one): ~~Phone~~ email Only fill in this box if you are the participant’s nominee:

|  |  |
| --- | --- |
| Nominee name: | [full\_name] |

**Only fill in this box if someone is helping you. For example, a family member, a carer or advocate.**

|  |  |
| --- | --- |
| Representative name: | [full\_name] |
| What is your relationship to this person: |  |
| Organisation (if any): |  |
| Postal address: | As above |
| Home contact number: | As above |
| Work contact number: | As above |
| Mobile: | As above |
| TTY: |  |
| Email: | As above |

**Representative preference for contact (circle one): phone email**

# Part C – What are the grounds for this review?

## What is your request for review about?

#### As per section 99(1) of the NDIS Act, I am requesting a decision review about: “*a decision to approve the statement of participant supports in a participant’s plan”.*

#### *My initial NDIS plan (dated 17th December 2020) underestimates my functional challenges and is not appropriately supportive for my disabilities. As confirmed in my psychologist’s report, I have Level 2 ASD and substantial difficulties.*

#### *The goals in my plan are reflective of discussions held at our planning meeting, but the cost categories and amounts are not reflective of those discussions, will not support me sufficiently to achieve the agreed goals.*

#### *Further, these supports do not take into consideration the reports from my specialists. Not doing so is in direct breach of the National Disability Insurance Scheme (Supports for Participants) Rules 2013, Part 3.2: “That evidence may include: (a) published and refereed literature and any consensus of expert opinion”.*

#### *Nor does it take account of the impact on my family. Not acknowledging this is in direct breach of the National Disability Insurance Scheme Act 2013, Section 4(12): “The role of families, carers and other significant persons in the lives of people with disability is to be acknowledged and respected.”*

*Following formal, written expert opinions from my specialists, I would like my annual budget to be amended to support the agreed goals as listed in the table below.*

#### *Further, I would like the funds that were allocated to “Improved Relationships” be moved to “Capacity Building”, so that I can have choice and control over the psychologist I see. Not allowing this is in direct breach of the National Disability Insurance Scheme Act 2013, Section 4(8): “People with disability have the same right as other members of Australian society to be able to determine their own best interests, including the right to exercise choice and control, and to engage as equal partners in decisions that will affect their lives, to the full extent of their capacity.”*

#### *I would like my Core Support to be plan-managed, my Support Coordination to be plan-managed, and my Capacity Building to be plan-managed.*

| ***Category*** | ***Goals Agreed in Planning Meeting*** | ***Justification & Evidence*** | ***Initial Requested budget*** | ***Current*** | ***Revised Budget*** |
| --- | --- | --- | --- | --- | --- |
| *Plan Management* |  |  |  | *$1,485* | *$1,485* |
| *Support Coordination* | *36 hours* | *My main carer (my mother) has 3 children all with additional needs, plus her own disabilities. She is trying to maintain a part-time job, contributing to the economy. Capacity to provide much-needed respite for my carer and the careful set up of supports for my first plan to meet my particular complex needs. This will ensure ongoing sustainability of care for myself. We request that this is plan-managed not NDIA-managed.* | *36 hours = $3,605* | *$2,403* | *$3,605* |
| ***Core*** | | | | | |
| * *STA / in-home support* | *I would like a support worker to provide me with opportunities for community participation, independence and daily living skills within my home and out in the community* | *I have been funded STA but zero hours of support workers.*  *Please see attached psychologist report (page x, paragraph y) and Carer’s statement.* | *8 hrs/week = $23,363* | *$3,485* | *8 hrs/week = $23,363* |
| *My home will be clean and maintained. Mum will have the supports she needs to build my capacity to work towards my goals.* | *I have been funded STA but zero hours of support workers.*  *Please see attached GP letter of support (page x, paragraph y), Uniting Integrated Family Services (page x, paragraph y), and Carer’s Statement.* |
| * *Level 1 and Level 2 Assistive Tech* |  | *My OT recommended items of low-risk assistive technology which were also ignored (please see attached OT report - page x, paragraph y).* | *$2,050* | *$400* | *$1,500* |
| * *Social group* |  | *My psychologist also recommended (in their letter of support) access to social and community youth programmes, these again have not been funded. Please see attached psychologist report (page x, paragraph y), and Social Group Quote.* | *$1,800* | *$0* | *4 x $450 = $1,800*  *(incl report)* |
| * *Parent training/ counselling* | *I would like to access family counselling to improve my family relationships.*  *I would like to access family counselling to improve my family relationships.* | *I have been allocated Therapy Assistant - Level 1 (x 2 hours per week) – according to my FOI case notes, this support is intended to “implement strategies at home and in the community provided by OT and Behavioural interventions.” And also to “provide parents with training they require to support Jackson in the home and the community.”*  *Therapy Assistants are not qualified to train parents or provide family counselling in a complex home environment. Further, these hours are not enough intervention to help me succeed in my home and community goals.*  *Further, as I am due to move in partially with my father, the entire family will need counselling and mediation support to ensure this significant transition is managed appropriately.*  *Please see attached psychologist report (page x, paragraph y), and Parent Training quote.* | *$3,000* | *$0* | *$3,000* |
| *My separated family is considerably dysfunctional and I have major sibling relationship issues due to disability dynamics between us. My parents are struggling with strategies on how to manage us. We have not been provided budget for family counselling.*  *Note funding this is in direct breach of the National Disability Insurance Scheme Act 2013, Section 5(f)(iii): “strengthen, preserve and promote positive relationships between the child and the child’s parents, family members and other people who are significant in the life of the child.”* |
| ***Capacity Building***  ***(Improved Daily Living)*** | *Therapists will provide me with support and strategies as I build my capacity to engage with others.* | *I have been allocated just one hour of allied health therapy per week – to cover all three disciplines: OT, psych and speech therapy. One hour a week is not enough, given my functional challenges.*  *Please see recent attached speech therapist report outlining my significant pragmatic language challenges (page x, paragraph y). And also, attached psychologist report (page x, paragraph y).*  *In response to the suggestion by the NDIA delegate, it is unreasonable for me to “use hours flexibly from OT hours included.”* | *See below for breakdown.* | *$10,996* | *See below for breakdown.* |
| * *OT* | *I will have an assessment by an occupational therapist who will provide me with strategies to learn organisational skills.* | *I have been allocated just one hour of allied health therapy per week – to cover OT, psych and speech therapy. One hour per week is not enough to cover all disciplines, nor the assessment.*  *Full functional assessment due to be completed Feb/March 2021.*  *Please see OT report page x, paragraph y).* | *Fortnightly = $7,380*  *(incl travel time + 2 hours reports)* | *$0* | *Fortnightly = $7,380*  *(incl travel time + 2 hours reports)* |
| * *Therapy Assistant (Level 2)* | *I will increase my social and communication skills and be able to engage with adults, peers and my family* | *I have been funded STA but zero hours for support workers. Given I am suffering from disability-related anxiety which is escalating, I need 8 hours of community-based and in-home support per week plus 4 hours further of therapy assistance per week.*  *My psychologist also recommended (in their letter of support) access to social and community youth programmes, these again have not been funded. Please see attached psychologist report (page x, paragraph y), Social Group Quote and OT report page x, paragraph y).* | *4 hrs/week = $20, 132* | *$0* | *4 hrs/week = $20,132* |
| * *Psychology/ Counselling* | *I would like stay connected with supports already in place.* | *Funding for my preferred psychologist is now locked away in “Improved Relationships”. This strips away my choice and control of my preferred supports.* | *Fortnightly = $5,575* | *$0* | *Fortnightly = $5,575* |
| *I will attend school regularly and engage with my teachers* | *My disability-related anxiety begins well before the school gates. It is a disability-related issue, not a department of education or department or health issue.*  *The role of a counsellor or regular psychologist, in addressing my disability-specific challenges, is different to that of a specialist in Behaviours of Concern. The two roles can not be amalgamated.*  *Due to my disabilities, I have anxiety-induced school refusal. It is escalating. My preferred therapist is no longer accessible due to the categories NDIS are funding. I need significant psychological, social and communication support to ensure my school refusal does not become permanent - this has not been allocated in the budget.* |
| *I will be supported by a counsellor who will help me to build strategies to attend school regularly* | *See above point.* |
| * *Speech* | *I will increase my social and communication skills and be able to engage with adults, peers and my family* | *I have been funded STA but zero hours for support workers. Given I am suffering from disability-related anxiety which is escalating, I need 8 hours of community-based and in-home support per week plus 4 hours further of therapy assistance per week.*  *My psychologist also recommended (in their letter of support) access to social and community youth programmes, these again have not been funded. Please see attached psychologist report (page x, paragraph y), and Social Group Quote.*  *I have recently undergone a Pragmatic Speech assessment and found to have severe Pragmatic Language Disorder (please see speech therapy report page x, paragraph y).* | *Fortnightly = $5,044* | *$0* | *Fortnightly = $5,044* |
| * *Assessments* | *I will have an assessment by an occupational therapist who will provide me with strategies to learn organisational skills.* | *I have been allocated just one hour of allied health therapy per week – to cover OT, psych and speech therapy. One hour per week is not enough to cover all disciplines, nor the assessment.*  *Full functional assessment due to be completed Feb/March 2021.* | *8 hours = $1,552* | *$0* | *8 hours = $1,552* |
| *Capacity Building*  *(Improved Relationships)* | *None* | *See above comments under Psychology above. The role of a counsellor or regular psychologist, in addressing my disability-specific challenges, is different to that of a specialist in Behaviours of Concern. The two roles can not be amalgamated.* | *$0* | *$6,228* | *None*  *(psychology budget above)* |
| *Increased Social and Community Participation (CB Social Community Civic)* | *I will increase my social and communication skills and be able to engage with adults, peers and my family* | *I have been funded STA but zero hours for support workers. Given I am suffering from disability-related anxiety which is escalating, I need 8 hours of community-based and in-home support per week plus 4 hours further of therapy assistance per week.*  *My psychologist also recommended (in their letter of support) access to social and community youth programmes,that directly engages my special interest - these again have not been funded. Please see attached psychologist report (page x, paragraph y), and Social Group Quote.*  *I have recently undergone a Pragmatic Speech assessment and found to have severe Pragmatic Language Disorder (please see speech therapy report page x, paragraph y).*  *Please see attached quote for video production course.* | *$320* | *$0* | *$320* |
| ***TOTAL*** |  |  |  | ***[funded\_supports\_total]*** | ***$74,756*** |

**When was the decision made?** (Please state date, month and year).

[plan\_start\_date]

**Why do you want the decision reviewed?**

#### Describe why you want the decision reviewed. Are there facts you feel have not been taken into account or properly looked at? Is there any additional information we may not have considered at the time?

#### *Due to my autism, I am currently suffering from severe anxiety – which significantly effects my daily functioning in the following key areas:*

#### *Difficulty transitioning in new (or even familiar) environments;*

#### *Social deficits/language disorder that creates daily communication challenges;*

#### *Hypersensitivity to a change in routine;*

#### *Inhibits my ability to leave my room, resulting in me avoiding community outings, avoiding my friends and regular school refusal.*

#### *impacts my ability to be independent and a contributing member at home and in my community.*

#### *My anxiety seems to be escalating. Along with CoVid stressors, I suffered a bad experience at my previous local school and my disabilities have caused me to react to the stress in a disproportionate manner.*

*~~I~~ avoid leaving my room at home and there is a significant risk that I will continue to refuse to attend school. I am aware that I am facing permanent school-refusal and social isolation if I do not get adequate disability-related supports now. My mother and father worked together to ensure my previous school accepted me again (they initially refused), and I am due to move in partially with my father for zoning purposes. I will need additional support for this significant transition to my home life, and my father will likely need additional parent training.*

*I do not require a Behaviour Management Plan. I require the support of the NDIS to trust the expert opinions contained in my reports and the impact statement from my mother. My experts know me as a person, my challenges; and the supports I need to work towards achieving my goals so I can become more independent and live a more ordinary life.*

*I have attached a new report by my Speech Therapist confirming I have Severe Pragmatic Language Disorder. This is a considerable barrier to my ability to: participate in the community, maintain meaningful relationships and contributes to my anxiety and feeling unsafe.*

*Please also refer to the above table which lists the goals and supports agreed upon in my initial NDIS planning meeting, and the budget that was allocated – there is an obvious mis-match~~.~~*

**How has it affected you?** (Please tell us how the decision has affected you?)

*I have autism, ADHD, severe anxiety, oppositional and challenging behaviours, and more recently due to CoVid and school issues: depression, self-harm and suicide ideation.*

*In my home, I find it difficult to know what to do, when it needs to be done, why it needs to be done and how it is to be completed. I currently need to be instructed, step by step on what to do to complete the task. This includes assistance to dress, bathe, brush teeth, wash hands and assistance with any planning or organisational tasks. I find the tasks quite overwhelming, not knowing what to do, deciding where to put things, and remembering where things are.*

*My specialists confirm that I need support with mobility, communication, social interaction, learning, self-care, restrictive eating, self-management.*

*I am now in adolescence which is bringing with it additional challenging behaviours and anxieties, all related to my disabilities, which is having significant impact on my relationships with my family and peers.*

*I also currently don’t understand the importance of personal hygiene and will not shower for a week, and will often forget to change my underwear. I also often sleep in my day clothes.*

*My parents are separated. I currently live with my mother and my two brothers – Max (11 years old also has ASD, ADHD and challenging behaviours), Fletcher (4 years old is currently being assessed). I am due to move in partially with my father soon to ensure I’m residing within my preferred school’s zone. This change in routine is going to be very stressful to myself, my brothers and my parents.*

*My mother works part-time, she has been diagnosed with ASD, ADHD and PTSD, as well as depression, anxiety and arthritis. She also suffers from stress-related incapacitating migraines and unable to leave her bed for whole days. My father is worried about looking after me because he struggles with structure and routine, keeping his house maintained and looking after himself, both physically and mentally. We do have very similar characteristics with our executive functioning difficulties, anxiety and emotional regulation challenges. Dad gets overwhelmed very easily and procrastinates. He suffers from severe anxiety and depression. I know that both of my parents really struggle to support us.*

*Finances at home are strained as mum can only work reduced hours and her job is low-paying. In addition, my dad recently became unemployed, so he is not paying child support.*

*My specialists (including psychologist and paediatrician) recognise that due to my disabilities, I am now at risk of permanent school refusal and social isolation. My difficulty in leaving my room and my inability to attend school is not something I choose to do. My whole body, mind and instincts are screaming at me that it is dangerous. This is a purely disability-driven reaction. I need significant support, allowing me choice and control, to overcome it.*

*The budget allocated to me has created significant barriers and stress to myself and my family. My mother is particularly concerned because she is scared for my future. My parents cannot fund the supports I require.*

**What outcomes are you seeking?** (Please tell us what you expect from this review?)

*I would like my budget modified with the supports listed in the table above, so that I have at least a chance of attaining my goals.*

***Why these supports meet the REASONABLE & NECESSARY criteria:***

***Does it support you to achieve your NDIS Plan Goals?***

*YES – the initial plan underestimated my functional challenges and was not sufficient to help me achieve my goals. The proposed new plan is.*

*Please see attached report from OT, Speech Therapist and Psychologist for expert opinion on why these supports are reasonable and necessary for my individual, disability-related needs.*

***Does it assist your social and economic participation?***

*YES*

*This increase in budget for therapies and supports will strengthen me mentally, and empower me with practical strategies. This in turn will reduce the impact of my disabilities long-term, assist me to return to school and to gain the confidence to venture out into the community.*

*This will reduce my future reliance on government benefits and the NDIS, and facilitate social participation and increasingly facilitate opportunities for economic participation. Please see attached reports from OT, Speech Therapist and Psychologist.*

***Is it value for money?***

*YES*

*The lifetime cost of person with autism is estimated to be $1.9 to $3.2 million.*

*SOURCE:* [*https://www.autismspeaks.org/science/science-news/lifetime-costs-autism-average-millions*](https://www.autismspeaks.org/science/science-news/lifetime-costs-autism-average-millions)

*$74,756 of therapy, in a year critical for my development, is investment to reduce this longer-term financial burden. The proposed therapies are necessary at home and in the community, to strengthen me mentally and give me strategies to increase my independence and reduce my long-term reliance on government benefits and the NDIS, and further to reduce my burden on formal and informal supports.*

*I hope to manage my disabilities and be able to return to school and the community as soon as possible. I do not currently feel strong enough and my anxiety is too overwhelming. I am aware that permanent school-refusal is very stressful to my parents, not conducive to my long-term mental health and increases my long-term dependency on the government.*

*Without support now, during my formative adolescent years, I am at risk of never being able to live independently.*

*Using the NDIS’s preferred keyworker model, psychology, speech therapy and OT are specialist supports recognised for their positive impact on many disabilities. Support workers and therapy assistants will work on goals and strategies implemented by my more expensive specialists. This model is recognised to be cost-effective.*

*My psychologist, speech therapist and OT know my NDIS goals and have strategies to help me achieve them.*

***Is it effective, beneficial and current good practice?***

*YES*

*Using the NDIS’s preferred keyworker model, psychology, speech therapy and OT are specialist supports recognised for their positive impact on many disabilities. Support workers are cheaper than the specialists, and will work on the goals and strategies implemented by my specialists. This is a model that is well recognised to be cost-effective.*

*I had begun to feel a noticeable improvement in my psychosocial strength because I felt safe with my therapist and am able to connect and engage, which is a very difficult for me. It is imperative for my progression that I am able to see the therapists of my choice, who through ongoing therapy, collaboration and a care plan, will reduce the barriers I currently face that impacts my functional capacity.*

***Is the expectation of families/carers/informal supports/community too high?***

*YES*

*My parents are separated. I currently live with my mother and my two brothers – Max (11 years old also has ASD, ADHD and challenging behaviours), Fletcher (4 years old is currently being assessed). This is likely to change soon as I am due to move in partially with my father to ensure I’m residing within my preferred school’s zone. This change in routine is going to be very stressful to myself, my brothers and my parents.*

*My mother works part-time, she has been diagnosed with ASD, ADHD and PTSD, as well as depression, anxiety and arthritis. Some days, I know that my parents really struggle to support us.*

*Finances at home are strained as mum can only work reduced hours and her job is low-paying. In addition, my dad recently became unemployed, so he is not paying child support.*

*My specialists (including psychologist and paediatrician) recognise that I am at risk of permanent school refusal and social isolation. My inability to attend school is not something I choose to do. My whole body, mind and instincts are screaming at me that it is too dangerous to attend my local school. This is a purely disability-driven reaction. I need significant support, allowing me choice and control, to overcome it.*

***Is it the NDIS responsibility?***

*Yes, mydisabilities are lifelong.*

*Given evidence of my disabilities and their life-long nature, the requested supports are most appropriately provided through NDIS, rather than through other service systems already available under Australian law.*

*See separate reports from:*

* *OT (page x, paragraph y)*
* *Speech Therapist (page x, paragraph y) and*
* *Psychologist (page x, paragraph y)*

# Part D – Further information

## Supporting information

#### Please attach copies of any documents you think may help us to review this decision. For example letters, references, emails. If you don’t have any, can you tell us what information you think we need to get?

*Please find attached supporting documentation from:*

1. *Psychology - Okey Dokey Childhood Psychology (dated November 2020)*
2. *OT - Go Beyond Therapy - OT (dated October 2020) – includes recommended Assistive Technology. Full functional assessment due to be completed Feb/March 2021.*
3. *GP - Wicklow Avenue Medical Centre – family GP (dated December 2020)*
4. *Family - Uniting Integrated Family Services – family crisis support (dated Sept 2020)*
5. *Paediatrician - Kudos Paediatrics (dated November 2020)*
6. *Speech - AppleTree – Speech Therapy (dated January 2021)*
7. *Support Coordination - Reach Enhanced Care (dated January 2021)*
8. *Quote - Social group (downloaded 3rd Feb 2021,*

*https://www.icannetwork.com.au/res/uploads/2019/07/I-CAN-ONLINE-GROUP-MENTORING-2019-OVERVIEW-DETAILS.pdf)*

1. *Quote - Parent training/counselling*
2. *Quote - Increased Social and Community Participation (CB Social Community Civic)*

*Please let me know if you require any further documentation.*

**You can also write a letter to the NDIA and address it to PO Box 700 Canberra ACT 2601; telephone us on 1800 800110, or lodge your Application for review of a reviewable decision form at your local NDIS office.**

##### Personal information collected

The NDIA needs to collect some of your personal information so it can effectively conduct an internal review of a reviewable decision made under the *National Disability Insurance Scheme Act 2013*.

Just so you are aware, any personal information the NDIA collects is protected under the NDIS Act and the *Privacy Act 1988*.

You can also ask to see what personal information (if any) the NDIA has about you at any time, and you can get it corrected if your information is wrong.

##### Personal information use and disclosure

The NDIA will use your personal information to do an internal review of a reviewable decision made under the NDIS Act.

If you do not provide all of the information requested on this form, your request for an internal review may be delayed due to the NDIA not having enough information to consider the decision, which is under review.

The NDIA will not use any of your personal information for any other purposes, or disclose it to any other organisations, individuals or overseas recipients unless it is authorised by law or you give us consent.

The NDIA’s privacy statement describes

* how we will use your personal information;
* reasons why some personal information may be given to other organisations from time to time;
* how you can access the personal information we have about you on our system;
* how you may complain about a breach of the Australian Privacy Principles and how the NDIA will deal with your complaint; and
* how you can correct your personal information if it is wrong. You can [read the statement on the NDIS website](http://www.ndis.gov.au/privacy).

##### Personal information storage

**The NDIA uses an Australian Government computer system to store personal information. System users other than NDIA staff may at times be able to see your name when performing duties for their own programs but they are not permitted to record, use or disclose any information and they will not know if you become an NDIS participant. State or territory government officials may also have access to your personal information as part of the agreement between governments to assist the states and territories in their NDIS evaluation.**

**Appendix 1- Reviewable Decisions**

Each of the following CEO decisions is a ***reviewable decision***:

1. a decision a person does not meet the access criteria;
2. a decision not to specify a period under s 26(2)(b);
3. a decision to revoke a person’s status as a participant;
4. a decision to approve the statement of participant supports in a participant’s plan;
5. a decision not to extend a grace period;
6. a decision not to review a participant’s plan;
7. a decision to refuse to approve a person or entity as a registered provider of supports;
8. a decision to revoke an instrument approving a person or entity as a registered provider of supports;
9. a decision to make, or not to make, a determination in relation to a person;
10. a decision not to determine a child can represent themselves;
11. a decision to make, or not to make, a determination a person has parental responsibility for a child;
12. a decision to appoint a plan nominee;
13. a decision to appoint a correspondence nominee;
14. a decision to cancel or suspend, or not to cancel or suspend, the appointment of a nominee;
15. a decision to give a notice to require a person to take reasonable action to claim or obtain compensation;

(oa) a decision to refuse to extend a period;

(ob) a decision to take action to claim or obtain compensation; (oc) a decision to take over the conduct of a claim;

1. a decision to give a notice the CEO proposes to recover an amount;
2. a decision not to treat the whole or part of a compensation payment as not having been fixed by a judgement or settlement;
3. a decision not to write off a debt;
4. a decision under section 192 that the CEO is not required to waive a debt;
5. a decision under section 193 not to waive a debt;
6. a decision the CEO is not required to waive a debt;
7. a decision under section 195 not to waive a debt