Response to NDIS Home and Living Consultation Paper:

# An Ordinary Life at Home

This response to the Home and Living Consultation Paper comes from AccessAccom, an SDA provider operating in NSW.

Generally

The vision and rhetoric of the Consultation paper are laudable and if they were being delivered on the ground then there would be a lot of happy participants.

Our first and major concern is the huge disparity between the title of the Consultation- An Ordinary Life at Home- and the operational outcomes on the ground. An Ordinary Life at Home is a commendable concept and one that all our clients aspire to when they apply to live in our accommodation, however, participants are constantly being denied an ordinary life when their eligibility for SDA is considered and approved, but their choice and control is completely ignored.

It is not in any way normal for some-one who has been working and independent all their lives to be provided funding for shared housing and told that this is value for money irrespective of Participant preferences and what would be a reasonable expectation of a normal life. It is disingenuous of the NDIA to issue a consultation paper referring to a normal life and the ability for some people to live on their own when in their day-to-day operations they dictate that all people should share with strangers who are also disabled whenever, in their words- there is no evidence that a Participant

can’t share.

We would also put in a plea for the Agency to substantially improve its operational administrative and IT processes as a priority so that fundamental things such as correspondence is not lost and is dealt with without weeks of delays from the “Enquiry” system and the random erroneous decision making at the enquiry stage is eliminated by providers being able to contact the correct people direct.

# Vision

The Vision again refers to ordinary lives in ordinary homes and included in the community – ”An Australia where disability doesn’t limit where, how or who you live with”.

Currently ‘disability’ is limiting people to shared housing rather than a choice of being able to live alone if that is the choice of the participant.

The assumption that people who live alone will need “dedicated 1:1 supports 24 hours a day “ is

erroneous and extreme and in our experience does not represent the needs of any of our clients.

# Choice and Control

The document also states that by strengthening the Scheme, the NDIS will enable participants to have more choice and control over their lives, again this is not being borne out in reality. Participants frequently have their funding cut on review and are denied their choice of accommodation.

Scheme sustainability is emphasized although in practice this is being used as an excuse for cost cutting without considering best outcomes for the client in the long term, even though there is widespread support in the Australian Community for fully funding the NDIS

Another statement on the first page says that the intention is to create a Scheme “helping you to live ordinary lives, in ordinary homes, in ordinary communities”

AccessAccom is a provider of various types of SDA including of apartments which are integrated into mainstream housing developments. We can’t think of anything more ordinary, and yet applicant after applicant is currently being told that they have funding to live in a shared house of two or three people. That is not an ordinary life.

Page 14 states- “We want your home to be a place to help you experience an ordinary life in your chosen community. To do this you need to have choice and control over where, how and who you live with”.

One of the options given here is living alone. However, this option is not being respected with the

current operational outcomes for applicants. They are being told that it’s not VFM to be supported to live alone and that VFM always trumps choice and control. These determinations are being made without reference to the actual support costs in the type of clustered housing that has been selected as a preference and which may be more efficient in terms of shared support costs

The life cycle approach referred to on page 18 is also not being respected with mature independent people who have had a catastrophic injury being expected to suddenly accept to live an ‘ordinary life’ in a shared house.

So in summary, our experience is that currently participants are being denied the dignity of living alone and the reasons given are “ there is no evidence that they can’t share” and it’s not VFM.

# Policy

The Paper states that the new Policy will allow Providers enough time for changes to be made in the market (page 5) – however no announcement or warning was provided in 2020 when the policy of providing funding for participants to live alone was suddenly stopped after investment decisions had been made and millions of dollars committed and spent.

We would also question why SIL funding is being denied to participants who live in clustered apartment settings as they clearly share supports at different times of the day and in particular overnight.

# Conflict of Interest

We share concern over the conflict of interest when housing, support and support coordination are provided by the same organization and would urge the NDIA to mandate that these services should all be provided to a Participant by different organizations thus providing true independence. In our experience there is a much better service for Participants when getting independent Coordination of Supports than when this service is provided by the current housing/support provider.

The comment on page 18 “You may even be able to access Support Coordination and specialist support with exploration and design, separate from the providers of home and living supports to reduce potential conflicts of interest” does not go far enough to avoid conflict of interest.

It should be a given that Support Coordination is separate and independent of the provider of accommodation or support.

# Sustainability

It is not surprising that a large portion of NDIS funds are attributable to SIL because this cohort would be the most functionally impaired group of participants. (5.4% of participants access SIL with 27% of total NDIS supports -page 12)

We would dispute that the SDA Pricing and Payments Framework actually states that living alone is more expensive than living with other people. We accept that the NDIS cannot afford to pay for the support required for all participants to live alone, and indeed many do not want to. The high cost of supports particularly applies to people needing 24/7 1:1 supports and should not be extrapolated to apply to all Participants who express a preference to live alone.

# Individual Living Options

While ILO s may be an interesting option for some participants, particularly those who have strong and extended family networks, there seems to be an over-reliance on ILOs to save money for the NDIA. In our experience families are usually completely burnt out by the time SDA becomes an option for them. Informal supports are often short-lived as others move on in their lives and are no longer able to commit to the support arrangements. An ILO may take up an unsustainable amount of time and resources in planning and supervision which should also be taken into consideration when evaluating realistic and sustainable options.

# Exploration and Design

Once a client gets to the point of applying for Specialist Disability Accommodation, they will already have been through a number of different steps to get to that point.

* They will have identified some housing goals in their NDIS plan
* They will have funding for Coordination of Supports to guide them through the options available to them to find solutions for their housing needs.
* They have considered various options and locations of accommodation and decided what is suitable for them to live an ordinary life.

Exploration and design support is therefore welcomed so that participants truly understand their options and should be extended so that Participants can visit a range of possible homes and meet a range of support providers.

Practical support should also be provided for disadvantaged people with no family support when they transition from such scenarios as long-term hospital, correctional or RAC situations. There has often been great trauma due to a spinal injury or stroke and if the participant has few resources, the costs of removals/furniture/white goods/kitchen equipment and linen create a great deal of stress for the participant.

# Decision Making

Support for decision making is welcomed, particularly for people with cognitive disabilities. We would however note that in our experience, decision making for those with no cognitive disabilities is not being respected with regard to their home and living choices. When applying for SDA the outcome is decided for them and their preferences are overridden by poorly assumed value for

money (VFM) considerations which are made in isolation of a holistic view of the total costs of support, accommodation and the longer-term benefits of good outcomes for the participant.

# Market Stewardship

Responsible market stewardship is welcomed. The delivery of new products in the property market has long lead times of 2-4 years and needs reliable demand and geographic data to allow best outcomes and confidence for investors. The recent and perceived over supply of HPS single occupancy apartments does not take into account that many investors/developers build and enroll dwellings at that level in order to provide flexibility on occupants but operate them at a lower income level.

# Home Automation

Support for funding home automation AT is welcomed and some thought should be given to streamlining pricing so that costs can be re-imbursed in a timely manner.

It is also recommended that staff are properly trained in the features of the Design Guide so that incorrect assumptions of what SDA providers are responsible to provide as a basic standard is more widely understood.

# Innovations

* A most useful innovation to help support participants to explore their home and living options would be Specialist Support Coordinators who are focused on accommodation outcomes and have an in-depth knowledge of all the options.
* The NDIA should support the development of peer support groups /mentors to guide participants through the process of looking at their options and hearing what has been possible for other participants with similar goals; disabilities etc.
* The time frames for processing accommodation requests, SDA applications, Requests for RORD should all be transparent, committed to and adhered to.
* Address the current lack of holistic consideration of combined costs of accommodation and support. These decisions may be made in the same team within the NDIA but are not considered together as a package. The SDA panel appears to make assumptions which are wholly inaccurate regarding the costs of support for a particular type of accommodation rather than looking at the shared support costs in clustered apartments for example.
* Develop the IT system to recognizes that SDA is a separate support (not a home modification) and that payments should not drop out during plan reviews.

Yours faithfully,

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