

Initiatives to Deliver the Housing in the "NDIS Home and Living Plan."



MC Two Submission to NDIA Consultation

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Broad, diverse and extensive actions will be required to deliver on the aspirations outlined in the National Disability Insurance Agency (NDIA) consultation paper, "[An Ordinary Life at Home](#)" for the National Disability Insurance Scheme (NDIS) Home and Living Plan. This is particularly true for the housing component defined in the "Where I live" and "Who I live with" themes (The other two themes are "Who supports me" and "The things I use") (P13).

This paper identifies what is needed by contrasting the current system with the NDIA's vision for the future.

When that is done for housing, five strategic initiatives are proposed in this paper:

1. Leverage other Government housing programs for "the Other 94%"
2. Add a whole of community approach to the NDIS individual approach
3. Engage the expertise of the Housing and Homeless sectors
4. Develop a new SDA funding mechanism
5. Reach agreements with State/Territory Governments to redevelop their SDA Stock

NDIA's Vision

NDIA's vision is one where people with disability live ordinary lives in ordinary homes and are included in their communities (P.4). That vision is based on the United Nations Convention on the Rights of Persons with Disabilities (CRPD) (P.13). Broadly the NDIA seeks a system where participants have the ability to make choices equal to others (P.13). However, the NDIA does acknowledge that participant's vision needs to be achievable (P.6) and that its own reach is limited by the NDIS Act (P.13).

A Good Housing System for People with Disability

While the NDIS is framed around choice, for most people with disability including NDIS participants, the housing they occupy is dictated by one or more other factors.

These include:

- The **level of support** needed and the impact of that on housing requirements
- The type and level of **funding** secured
- The available or emerging **supply** of stock
- Their **financial capacity** or the financial capacity they can access

A comprehensive and robust housing system for people with disability will have a number of components, each of which needs to work. Fortunately, there is a proven practice in each area, albeit perhaps in different funding streams and/or in different parts of the country.

A sound housing system for people with disability will include the following elements:

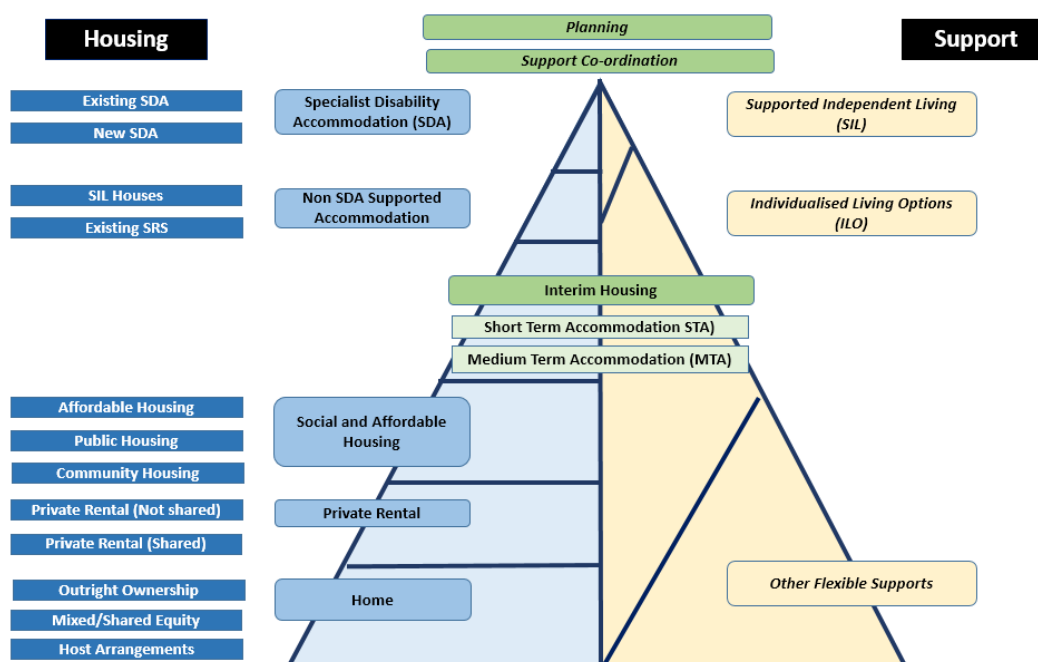
- **Information and assistance** including both general and localised information about available and potential options and help to access if required
- **Resourcing and Facilitation**, including education and secondary consulting for participants and providers as well as engagement with developers bringing new housing options (preferably proven in other settings) to local areas
- **Support and Co-ordination** that is understandable, informed, adequate and responsive
- **Interim and Transitional Housing** including short, medium-term accommodation and transition supports for both NDIS participant and their family
- **Buildings** that have contemporary configuration (including aggregation), are designed to meet the needs of the person with disability, are located to provide access to transport and services for participants and staff and have the equipment and technology required
- **Funding** that delivers reasonable cost contemporary housing at scale in a timely and reputable manner and that can address unaffordable rental costs
- **Housing management** that is informed and responsive

Therefore, initiatives to improve housing should be framed to address the barriers to housing in one or more elements of the housing system.

Housing for NDIS participants

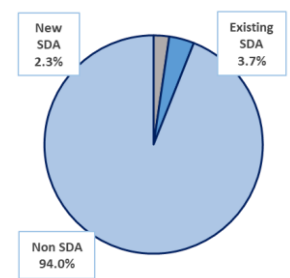
Generally, housing for NDIS participants can be framed in two sections: housing and support. Planning and support co-ordination provide direction. The housing can be grouped into Specialist Disability Accommodation (SDA), Non-SDA Supported Accommodation, Social and Affordable Housing, Private Rental and At Home. The supports are broadly made up of Supported Independent Living (SIL) for the highest need, the emerging Individualised Living Options (ILO), and other supports. Interim options (both short and medium-term accommodation) combine both housing and support. Planning and Support Co-ordination provides direction.

Diagram: Housing for NDIS Participants



Specialist Disability Accommodation (SDA)

SDA, housing for those with the highest support needs, is only available to about 6% of NDIS participants. While there is a great deal of focus on developing new SDA, this will only represent about half of the supply with much existing stock continuing to be used. A large proportion of the existing stock is group homes for five or more residents, which the NDIA has identified as potentially institutional (P.11). The biggest owners of SDA are State Governments.



Non-SDA Supported Accommodation

The rollout of the NDIS has fostered the development of SIL Houses, which broadly sit outside of NDIS housing policy. These new Non-SDA Supported Accommodation options operate alongside the existing privately-run housing such as Supported Accommodation Services (SRs) that have housing and support delivered by a single provider.

Social and Affordable Housing

Most NDIS participants will be eligible for social housing comprising public housing (managed by the Government) and community housing (managed by regulated, not for profit organisations). However, The paper identifies insufficient accessible and affordable private market and social housing rental (P.11).

Some State/Territory Governments are currently developing new social housing at scale, which, in a small number of cases, includes housing for NDIS participants. It should also be noted more than 10% of existing social housing tenants are likely to have or be eligible for the NDIS. Also, affordable housing, framed at 75% to 80% of market rent, is largely unaffordable to NDIS participants except where the housing is shared.

Private Rental

Private rental is broadly unaffordable for NDIS participants to live alone. However, more options become available if the housing is shared, especially where market rent can be paid for the shared space (including through ILO).

At Home

Overall, NDIS participants and their families are poorer than the general population and have a lower level of home ownership. Where people live at home, it is often with their families, typically to an older age than for those without disability. There are a small number of successful mixed and shared equity programs, but these are not currently funded to grow at scale. The ILO is expected to generate growth in host arrangements.

NDIA's Proposed New Approach

NDIA has a market stewardship role that includes monitoring, evaluation, oversight and, where necessary, intervention. The NDIA has acknowledged that not enough has been done to encourage new models of home and living (P.18). Indeed more people have moved into group homes than moved out (P.13). Closed system options such as SIL homes have been introduced (P.11). Additionally, there has also been a lack of access to Capital or Fixed supports such as SDA, Assistive Technologies (AT) and home modifications (P.12).

The NDIA notes that funding responsibility accessible and affordable accommodation outside of SDA is with other Government Agencies (mainly State/Territory Governments). This includes social housing, tenancy support, homelessness services and housing for out-of-home care and people in custodial settings (P.9 & P.10).

The NDIA identifies that clear and easy to understand information and supports will be required to enable participants to consider all options (P.15). The NDIA's new approach will include early planning and option testing (P. 4). Support will be required from many people and organisations (P.4), including experienced providers (p.5). Specifically, it identifies that this will be a new approach for many planners, Local Area Coordinators (LACs), support coordinators, providers, families and others (P.16).

Budget will be more flexible, consistent, fair and transparent (P.16), with Home and Living as part of the overall budget (P.17). Fixed costs such as SDA, Assistive Technology (AT) and home modifications will continue to be set aside (P.17), and there will be an option to shift funds from Home and Living to Fixed Costs (P.17).

The NDIA will continue to fund SIL, ILO, SDA as well as Assistance with Daily Living (ADL), Short Term Accommodation (STA), Medium Term Accommodation (MTA), SDA (P.6) but will expand the funding of exploration and design beyond ILO (P.15). The NDIA proposes a range of housing options, including a new type, "Contemporary group houses", for 2 to 4 people (P. 4). It seeks to promote different options to closed system models such as SIL homes, large group homes, Aged Care, Legacy and Basic SDA (P.18).

Five initiatives

There will need to be a range of initiatives to ensure that as many as possible of the 76,062 participants with a "Where I Live" goal in their plan (P.12) can secure the housing they require. The five are proposed.

1. Leverage other Government housing programs for "the Other 94%"

Only about 10,000 additional participants are expected to be housed in an expanded SDA. The NDIA has identified that the primary responsibility for housing the remaining 65,000 with a housing goal in their plan, "the Other 94%", sits with other Government Agencies (mainly State/Territory Governments). However, in many cases, the cost of funding access to other proven programs will be more than offset by support efficiency secured in NDIS funded services. It may also be the only way participants can achieve the goals in their plan. In such circumstances leveraging existing housing programs to secure housing goals for NDIS participants is consistent with the NDIA's objectives and its commitment to flexible budgets.

2. Add whole of community approach to NDIS individual approach

The NDIA approach is framed around empowering individual consumers, but, in most cases, NDIS participants are not consumers in a housing market but are seeking subsidised access. Therefore it is important to resource community-level work to lead actions that can generate opportunities not available with individual consumer actions. This slow community development approach is already being explored in pilot work, albeit in an uncoordinated way.

3. Engage the expertise of the Housing and Homeless sectors

The paper proposes that planners, support coordinators, and Local Area Coordinators (LACs) will be supported to know and understand the choices and options (P.15). Staff in these services typically have a low level of localised housing knowledge. In contrast, local housing and homeless services have expertise in transferable programs and experience in housing NDIS participants but not resources to contribute to and deliver NDIS housing plans. Direct engagement and resourcing of these services can leverage their expertise for NDIS participants.

4. Develop a New SDA funding mechanism

In 6 years, SDA has delivered 3,200 of the projected 10,000 growth places, and not always what is needed. For example, group homes of five residents, which NDIA identifies as institutional (P.11), have been built. The NDIA proposes that funds can be shifted from Home and Living to Fixed Costs (P.17), potentially enabling the topping up of SDA payments. This will add complexity to a market with short supply. A new SDA funding methodology is needed to deliver contemporary housing at a reasonable cost and in a timely, reputable manner.

5. Reach an agreement with State/Territory Government to redevelop their SDA Stock

The NDIA is seeking to drive the redevelopment of larger and older SDA (which currently houses more than 12,000 participants) to promote different options to the "closed system" SIL homes, large group homes, Residential Aged Care (RAC), Legacy and Basic Stock SDA (P.18). State/Territory Governments own or hold equity in a large amount of older SDA. It would therefore be appropriate to seek SDA redevelopment agreements with individual State/Territory Governments. These developments could be articulated into the redevelopments and expansions of social housing.

Conclusion

Securing better housing is central to tens of thousands of NDIS participants achieving their goals. It is also central to securing the success of the NDIS and contributing to the Scheme's financial sustainability. To promote aspiration for better housing for NDIS participants without mechanisms to deliver it would be a cruel deception. The five initiatives outlined in this paper, while complex, could contribute significantly to the delivery of NDIA's vision of an ordinary life at home for NDIS Participants.

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