

EXECUTIVE SUMMARY

FINAL REPORT NO. 417

Specialist Disability Accommodation in the social housing sector: Policy and practice



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Publication Date March 2024

DOI [10.18408/ahuri8129801](https://doi.org/10.18408/ahuri8129801)

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ISBN

978-1-922498-85-4

Key words

Disability housing, social housing sector, people with disability, assistive technology

Series

AHURI Final Report

Number

417

ISSN

1834-7223

Publisher

Australian Housing and Urban Research Institute Limited
Melbourne, Australia

DOI

10.18408/ahuri8129801

Format

PDF, online only

URL

<https://www.ahuri.edu.au/research/final-reports/417>

Recommended citation

Crowe, A., James, A., Peaty, G., Malbon, E., and Ellis, K. (2024) *Specialist Disability Accommodation in the social housing sector: Policy and practice*, AHURI Final Report No. 417, Australian Housing and Urban Research Institute Limited, Melbourne, <https://www.ahuri.edu.au/research/final-reports/417>, doi: 10.18408/ahuri8129801.

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Acknowledgements

This material was produced with funding from the Australian Government and state and territory governments. AHURI Limited gratefully acknowledges the financial and other support it has received from these governments, without which this work would not have been possible.

AHURI Limited also gratefully acknowledges the contributions, both financial and in-kind, of its university research partners who have helped make the completion of this material possible.

The authors acknowledge the work of Mike Kent, Angus Buchanan, Gemma Carey and Celia Green who participated in earlier stages of this project.

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Executive summary

Key points

- **Specialist Disability Accommodation (SDA) is a support program provided by the National Disability Insurance Scheme (NDIS) for Australians with extreme functional impairment or very high support needs to access specialist housing solutions.**
- **Research respondents overwhelmingly viewed the program as a positive contribution to the delivery of housing for people with disability. It was recognised that the program was still in a maturation phase and that there remained scope for improvement.**
- **Interactions between the social housing sector and the SDA program are complicated. State and territory government roles need to be further defined. Community housing providers (CHPs) have specialist knowledge and skills that could be leveraged to improve delivery of, and access to, SDA.**
- **The application process—described by participants and their support teams as exclusionarily complex—shapes access to SDA and impacts the ability for people with disability to meet their Home and Living goals.**
- **Central tenets of choice and control are constrained by the need to ensure that all SDA provisions are ‘reasonable and necessary’ (NDIS 2019). Subjectivity around this phrase results in opaque and inconsistent decision-making, and undermines participant outcomes and housing provider confidence.**
- **Assistive technology is not well integrated into the SDA program, despite sound evidence that it supports Home and Living goals and offers a cost-saving mechanism.**

Specialist Disability Accommodation (SDA) is a support program provided by the NDIS for Australians with extreme functional impairment or very high support needs to access specialist housing solutions. Prior to the SDA program, many people with disability lived in group homes, with parents or family, or in institutional settings (Bostock, Gleeson et al. 2001; Priest and Bruno 1990). People living in these housing arrangements lacked independence and autonomy, and had little choice in where or with whom they lived. Collectively, these factors resulted in very poor housing outcomes for people with disability (Beer, Faulkner et al. 2011; Beer, Flanagan et al. 2019). In response, the SDA program aims to provide people with disability choice and control in relation to where, and with whom, they live (NDIA 2022a). Through the provision of specially designed housing, the program aims to empower NDIS participants by increasing independence, maximising social and community participation, and transitioning away from congregate living arrangements (COAG 2021; NDIS 2021a; Winkler, Aimers et al. 2021).

The SDA program is structured to create a demand-driven market, where recipients have more agency in the properties they can access. It is considered one of the largest social-impact investment opportunities in Australia, with the potential to generate long-term stable returns to investors while delivering appropriate housing solutions for people with extreme functional impairment and very high support needs (Winkler, McLeod et al. 2020). A core goal of the program is to encourage investment and growth of appropriate housing supply, while reducing reliance on public funding mechanisms. By leveraging the financial resources, skills and expertise available within the mainstream economy, the anticipated outcome of the program is to increase the diversity of adequate, affordable and appropriate accommodation available to people with disability across a range of locations (Beer, Flanagan et al. 2019).

Key findings

Access to appropriate housing is crucial for upholding the dignity, wellbeing and overall quality of life for individuals with extreme functional impairments. This study underscores robust endorsement for the SDA program, which enables people with disability to secure housing that is both well-designed and strategically located. Nevertheless, various impediments to accessing and delivering SDA pose challenges that impact the program's effectiveness.

Social housing and the SDA program

Interactions between the social housing sector and the SDA program are complex. The market stewardship function of the SDA program sits within the remit of the Commonwealth government, which creates ambiguity around the role of the state and territory governments within the program, and around housing for people with disability more broadly.

Consequently, roles adopted by state and territory governments are not nationally uniform. Initially a core developer of SDA, some Community Housing Providers (CHPs) are pausing delivery of SDA. Simultaneously, there is recognition in the SDA sector of the unique skills that CHPs can offer through their extensive knowledge of the program, as well as the expertise to produce good housing outcomes for tenants with high and complex needs. CHPs argued that this role is not recognised, and that they are shouldering the financial risk associated with SDA delivery until late in the development stage, with a potentially negative impact on smaller providers.

Communication channels between the National Disability Insurance Agency (NDIA) and the social housing sector are limited, which amplifies risk for CHPs and affects decisions relating to the delivery of dwellings under the program. This constraint also impedes the planning decisions of state and territory governments—particularly regarding the reform of disability and housing policies at the state and territory level. This limitation has significant implications for NDIS participants with high needs who are ineligible for SDA funding and depend on state government intervention. Despite recent improvements, data provided by the NDIA continued to be viewed as unreliable, inaccurate or not detailed enough to fully inform investment decisions. Consequently, challenges persist in identifying housing need and mitigating vacancy risk—both of which hinder SDA development. The lack of data granularity further complicates the identification and matching of NDIS participants with appropriate SDA dwellings.

SDA program processes are complex

The complexity of the SDA program represents a significant barrier for applicants. The research found a dearth of information and education for NDIS participants in navigating the program, including the process of applying for, finding and securing appropriate SDA. As a result, informal support networks shoulder a significant portion of the workload associated with negotiating and interpreting the program and its processes on behalf of NDIS participants. The lack of education and awareness about the SDA program often leads families to mistakenly perceive group homes as the sole alternative.

Functional capacity assessments (FCAs) and the resulting reports are an essential component of SDA funding outcomes. The quality of these reports depends on the knowledge of individual occupational therapists (OTs) and their familiarity with NDIS processes and protocols. Our findings show that knowledge of the SDA program differs nationally and between support coordinators—as a result, not all applicants are afforded equal access. A need for greater standardisation of the SDA application process was observed. At the same time, it is critical that standardisation does not compromise the allied health process. This outcome relies on the consistency and transparency of decision-making by the NDIS when assessing applications for SDA funding.

Finding suitable SDA for NDIS participants requires thorough knowledge of the available options, clear communication, and a focus on the participants' preferences. The NDIS has structured the SDA program as a marketplace. However, there is no centralised database that NDIS participants can search for vacancies. Instead they must traverse websites of third-party entities, some of which may be unknown to the participant. Therefore, the search for SDA differs across states and territories, and between metropolitan and regional areas. This exacerbates a process that is already complicated and difficult to navigate.

Insufficient information, support and education on how to navigate the SDA program, coupled with the potentially difficult decision to transition into SDA, can create an emotionally complex experience for participants and their families.

Funding decisions are inconsistent

The SDA program is designed as an individualised, participant-led funding model. The program attempts to balance empowering NDIS participants with choice and control against the 'reasonable and necessary' criteria used to inform NDIA decision-making. Specifically, the subjective nature of 'reasonable and necessary' has resulted in a lack of transparency and consistency in SDA funding determinations, which has undermined both participant outcomes and provider confidence. Panels and interviews conducted as part of this research found evidence of inappropriate determinations made in contradiction of clinical evidence provided, and without justification. Examples were cited of participants with similar housing needs receiving very different funding outcomes. As a result, the SDA program often falls short in achieving the desired outcomes for NDIS participants—specifically relating to the aspiration to live alone.

SDA funding approvals that do not meet the needs of NDIS participants can result in lengthy, costly and complex appeals processes, which also carry tangible health and wellbeing repercussions for people with disability. For housing providers—CHPs, in this case—delivering appropriate housing solutions becomes a challenge, increasing vacancy risks and ultimately affecting the delivery of SDA.

Pricing arrangements need to reflect the true cost of delivery

The mismatch between the current price guide and the true cost of delivering SDA has a significant impact on the sector. Also, delayed payments from the NDIA have substantial financial implications for CHPs, particularly those with limited financial capacity. Extended wait times to secure overdue payments have implications for managing debt finance, SDA portfolio growth, new entrants and retaining current providers. The pass-back mechanism, a bilateral agreement to ensure the same net effect on scheme funding (NDIS 2016a), also hinders the substantial improvement required of 'Basic' SDA stock, as well as limiting the extent to which CHPs can leverage against this housing to reinvest in new SDA. Subsequently, the cost of dwelling upgrades is not feasible under the current pricing framework.

Assistive technology is not well integrated into the SDA program

This research underscores a critical gap in the integration of assistive technology (AT) within the SDA program. The lack of comprehensive AT inclusion across all design categories poses challenges for both SDA providers and recipients. Although some CHPs voluntarily integrate AT infrastructure into 'New Build' stock, this practice is not mandated in SDA policy. Retrofitting AT infrastructure post-build incurs substantial cost, which further complicates the issue.

Additionally, a misalignment exists between the NDIA's vision of AT (NDIA 2015) and the practical categorisation and funding of AT (NDIS 2022a; 2022b). The NDIA largely excludes AT designed for universal use from NDIS funding. This:

- contradicts the World Health Organization's (WHO) inclusive definition of AT
- limits access to transformative technologies for people with disabilities.

The NDIA's attempt to distinguish between AT exclusively designed for people with disabilities and 'mainstream' AT raises ethical and practical concerns that conflict with the NDIS's goals for choice, control and the principles outlined in the Convention on the Rights of Persons with Disabilities (CRPD) (United Nations 2006, Articles 9, 19, and 28).

Policy development options

Policy and practice opportunities exist to improve the efficacy of the SDA program while delivering significant wellbeing and quality-of-life benefits to people with disability nationwide. From a policy perspective, solutions exist to strengthen the SDA program, which is regarded as an important and necessary funding stream under the NDIS. For instance, policy change is needed to further support participants' rights to sole-occupancy housing outcomes, which would give NDIS participants genuine choice and control over their Home and Living goals. Policy also needs to ensure that the pricing of SDA accurately reflects the true cost of delivering SDA and establishes a funding mechanism for enhancing the quality and performance of 'Basic' SDA.

The onus is also on the NDIA to establish clearer guidance on state and territory government involvement in the program. Broadly, policy should further recognise the pivotal role of CHPs in the SDA program, particularly in regard to education, support and specialist tenancy management. This recognition should reflect the true cost of delivering and operating SDA. Additionally, the definition and application of AT (including 'mainstream' technologies) within the NDIS needs to be reviewed to mirror universal design principles and United Nations recommendations, ensuring its application to all SDA design categories.

Practice elements identified offer low-cost solutions to access and delivery barriers within the program that would have a positive impact on all stakeholders. These include:

- developing more accessible information and education pathways for NDIS participants
- establishing stronger communication channels between the NDIA and all SDA stakeholders
- continuing to improve the quality and granularity of demand data.

The NDIA must ensure that payments are accurate and timely, and that funding decisions are more transparent and consistent across applications. Implementing these recommendations concurrently will improve participant housing outcomes and improve the overall delivery of SDA.

The study

This research examines the interface between the social housing sector and SDA-funded dwellings, including NDIS participants' experience of accessing these homes and the extent to which they are equipped with AT. It also explores policy and practice opportunities available to improve the delivery of SDA.

Funded as part of AHURI's National Housing Research Program, this research used a qualitative research approach to understand the interaction between social housing and SDA, as well as the participant experience of SDA. A policy review of federal, state and territory government housing strategies, and of housing and service strategies for people with disability, identified the role of governments in the SDA program. The interaction of the SDA program with the social housing sector was explored through interviews with 22 individuals nationally working directly with NDIS participants, eight interviews with state and federal government representatives, and an online panel with 10 CHPs. Through Diverse Voices roundtables, 19 people with disability shared their views on SDA policy documents and accessing SDA. Finally, a second panel interrogated opportunities for policy and practice change to improve the delivery of, and participant access to, SDA.



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