

## ENABLING EFFECTIVE SUPPORTED INDEPENDENT LIVING

Supported Independent Living (SIL) services are for a small group of people who typically require substantial levels of NDIS supports and for whom it is important to ensure that accommodation requirements do not restrict their choice and control. Currently, all SIL providers are experiencing major delays in receiving payments for accommodation services provided to participants. Many are also having the serious cash flow issues arising from this compounded by inadequate vacancy management funding arrangements. Taken together, these two issues risk the viability of providers supplying this crucial component of NDIS services. Their failure will produce very adverse consequences for overall NDIS outcomes.

Alliance20 notes the work underway by the NDIA and while hopeful for improved SIL processes, secured independent living remains complex, cumbersome and inefficient. Alliance20 has suggested solutions ranging from changed processes to better links across funding requirements, handling of vacancies and planning timeframes.

### BACKGROUND

It is recognised that Supported Independent Living (SIL) support (that is, supported accommodation) is generally the most complex and costly service provided under the NDIS. Therefore, in terms of participant planning and funding and administration, detailed SIL processes are required for participants and service agencies. However, current processes for both SIL approvals and renewals are overly complex and unclear for providers and participants.

### CURRENT ISSUES

- There is no transparent process detailing assessments and other documentation required for new participants to be eligible for SIL.
- While it is recognised that SIL is a 'last resort' housing option, there is no established criteria for matching participants to different living/housing solutions.
- The process to fill vacancies is inefficient resulting in financial burden for providers.
- Non-emergency plan reviews are not prioritised, meaning that adding SIL funding, or support coordination to explore housing options is delayed until scheduled plan reviews and these delays often last many months.
- The time taken to implement and trial alternative housing options prior to being able to access SIL funding, could place participants in emergency circumstances.
- The SIL quoting tool/process does not allow for a whole-of-life view of needs and needs to be better linked with other funded and non-funded supports.
- Benchmarks used in the quoting process are not transparent.
- Quoting of SIL and other supports separately means that other supports may be overlooked, leaving the SIL provider responsible for unfunded supports.

- The NDIA can make changes to the SIL quote without informing the participant of the implications to the participant's whole-of-life weekly schedule. This leaves the provider in a situation where they are required to inform the participant and their family that supports have not been funded, rather than the NDIA informing participants and their families of NDIA decisions.
- The NDIA SIL quoting tool is time consuming and expensive to complete.
- Annual SIL plan reviews are not required for most participants as their support needs do not change year to year
- There is no clear link between SIL and Specialist Disability Accommodation (SDA) processes, so where SDA funding will reduce the need for support, the SIL model does not capture this dependency

## **IMPACT STATEMENT**

### **IMPACT FOR PARTICIPANTS**

- For participants where SIL is the most viable housing option, not having a clear path to SIL funding can cause delays and frustration.
- Without clear criteria to match, participants with very similar disability and lifestyle circumstances, but dealing with different NDIA planners or Local Area Coordinators (LACs), can receive different NDIS assessment outcomes.
- The rigidities around SIL funding reduce the options for participants to trade off choices around accommodation arrangements and other supports.

### **IMPACT FOR PROVIDERS**

- SIL providers cannot get confirmation from the NDIA that the participant will receive SIL funding prior to submitting a SIL quote and subsequently providers are reluctant to commit resources to navigate the NDIS on behalf of the participant. Often participants also do not have support coordination funding to assist with SIL processes.
- SIL providers that need to rent property have to carry rental and vacancy costs as the NDIS may not approve adequate SIL funding for a viable client cohort.
- Participants can't understand why providers won't commit to them, and therefore can blame the provider for NDIA decisions.
- Participant SIL quotes can be edited by the NDIA, which may mean:
  - the accommodation provider must increase the use of informal supports;
  - increased dependency on the guardian to provide support; or
  - providers must make changes to the participant's timing schedule which will impact other support services not incorporated in the SIL quote.

### **IMPACT FOR THE MARKET**

- Without a direct link between SIL and SDA it is impossible to guarantee the financial viability of some client cohorts. This reduces the opportunity to access rental properties that may be more appropriate to a participant's need to be in certain geographical regions

- Support trade-offs between SDA and SIL funding are not visible to the NDIA and therefore this funding relationship is not considered.
- Other agencies are investing in new build SIL accommodation that is reliant on participants having appropriate SDA funding and these agencies are asking the accommodation provider to manage and accept the risk that clients may not get SDA funding.
- Overall, the financial implications of the rigidities in the existing arrangements will result in limited options for accommodation being available for people with disabilities. The consequence of this will be poorer outcomes for participants and higher costs for providing the necessary supports.

## PROPOSED SOLUTIONS

Consideration should be given to:

- Clearly defining the participant requirements for each type of housing solution, i.e.:
  - The clinical assessments required
  - Case study examples to demonstrate participant classifications
  - Specify participant criteria to receive SIL funding
- Integrating SIL quoting with whole-of-life weekly schedule planning:
  - Include all formal and informal supports
  - Include all linking mechanisms between services (eg define exactly how much transport is required)
  - NDIA to present draft SIL and whole-of-life schedule to participant and/or guardian for acceptance/approval prior to finalisation
- Simplifying the SIL quoting process:
  - Provide a more user friendly interface for inputting participant schedules
  - For participants with no significant change in needs – renew automatically on the 'My Plan' expiry date for up to three or more years
- Linking SDA and SIL funding:
  - Clearly define the criteria that warrants a participant receiving SDA
  - Guarantee any support services determined by a trade-off between SIL and SDA funding.
- Building vacancy consequences into quoting processes. For example, SIL funding for an individual has a formulation that triggers increases whenever the accommodation has a vacancy. This removes the implication that an individual's funding for a SIL placement is unviable should something beyond their control occur, such as someone else leaving the accommodation.
- Changing planning timeframes for people relying on SIL. As identified in Issue No 3, people reliant on SIL have long term needs that are not suited to annual planning arrangements. Revised arrangements that better balance accountability with longer term needs and supports would be beneficial to planning around provision of SIL services.