

## CHANGES TO SPECIALIST DISABILITY ACCOMMODATION (SDA)

Alliance20 supports the reforms announced as part of the 2018 SDA Pricing and Payment Framework Review<sup>1</sup>.

The Review provides a solid foundation for participants to exercise choice and control of where they live and with whom they live with whilst meeting their individual support needs.

Alliance20 has identified further improvements with SDA eligibility and long-term sustainability.

### BACKGROUND

Getting Specialist Disability Accommodation (SDA) right is critical for the provision of housing options for NDIS participants enabling supported independent living for people with very high support needs or extreme functional impairment. Significant improvements have been announced and are being implemented as part of the 2018 SDA Pricing and Payment review. Alliance20 welcomes the reforms, changes to SDA rules and operational improvements announced in February 2019:

- Updated 2018-19 Price Guide, confirming CPI adjustments
- Internal SDA Panel (of experts) to improve process of SDA eligibility providing a more timely and consistent SDA decision
- Revised SDA rules
- Removal of requirement for participants to exhaust all other options before they can have their eligibility for SDA considered
- Enable the NDIA to provide SDA funding in a plan even if a dwelling is not available or soon to be available.
- Provide quarterly updates on SDA data. The NDIA will continue to expand and update the data set SDA data in future reports.
- Establishment of the SDA Reference Group with the first meeting held in March 2019.

SDA continues to grow both in the number of participants and registered providers. As of **March 2019** SDA has ([COAG Disability Reform Council Quarterly Report](#)):

- 12,345 Active participants with SDA support (4.8% of all NDIS participants)
- \$127 mil in Annualised SDA Supports in active plans
- 2,986 enrolled dwellings
- 892 SDA registered providers

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<sup>1</sup> [Specialist Disability Accommodation Pricing and Payments Framework FINAL REPORT, KPMG 3 December 2018.](#)

## **CURRENT ISSUES**

1. Challenges remain for participants and SIL providers navigating through the SDA application process. There is no SDA Application form to simplify and clarify the application process. As a result this process continues to be onerous and challenging for many participants and adds to the service pressures that SIL providers experience.
2. Sector feedback indicates that SDA assessment process is still slow and inconsistent:
  - Navigating through the process remains a challenge
  - Inconsistent approaches between NDIS offices.
  - Gaps between policy and practice continues, particularly eligibility for participants with intellectual disability and/or very high support needs.
  - CALD participants find the planning and SDA assessment process challenging having significant impact on their access and full utilisation.
  - 'NDIS participants' and 'NDIS plan nominees' unsure of their roles and responsibilities to ensure supports are included in their NDIS plan.
3. Continuity of Support (COS) participants are not receiving SDA equivalent funding, even where they are living in SDA with NDIS participants. This impacts:
  - Choice and control for COS participants
  - Options available to COS participants, particularly where SDA is being replaced
  - By way of context, it is estimated that 7% of all participants in the NSW disability system at the point of transfer to the NDIS became COS participants.
4. Alliance20 strongly supports the changes that provide greater investor certainty, it should also be noted that SIL providers continue to experience service pressures with the vacancy process.

## **IMPACT STATEMENT**

### **IMPACT FOR PARTICIPANTS**

- The SDA eligibility policy/practice mismatch experience by participants with intellectual disability leads to an inconsistent and unclear engagement for participants. This is further compounded for CALD participants.
- Many NDIS planners continue to focus on 'extreme functional impairment' physical disability as being the only reason to include SDA in a participant's plan. This causes confusion in NDIS planning processes, creating confusion for participants, support coordinators, SIL and SDA providers.
- COS participants should be provided with the same choice and control as NDIS participants enjoy. COS participants should be provided with comparable SDA options as part of continuity of support.

## **IMPACT FOR PROVIDERS**

- The vacancy process is long and protracted and impacts the viability of services when there is a vacancy.
- Overall the SDA process remains complex and time consuming, adding to the pressures service providers are managing impacting on their capacity to deliver sustainable service options for participants.
- Better information for participants through planners and support coordinators would also inform providers when supporting existing participants through the SDA process.

## **IMPACT FOR MARKET**

Ongoing attention needs to be focused in:

- Long term SDA certainty for participants
- SDA eligibility remaining over the lifetime of participants
- Greater transparency in SDA pricing formula to ensure greater investor certainty and growth in supply in the market.

## **PROPOSED SOLUTIONS**

Consideration should be given to:

1. SDA Application and Assessment Process:
  - Streamlining the SDA application process with standardised application form. This would greatly simplify the SDA process for all participants, particularly CALD participants.
  - Greater transparency of assessment process for SDA.
2. Increased support for key stakeholders:
  - Education about roles and responsibilities participants and NDIS plan nominees.
3. COS Participants:
  - SDA equivalent funding options must be made available to eligible COS participants to enable reasonable accommodation options to be provided. This will:
    - Ensure COS participants are not placed at risk of becoming homeless;
    - COS participants can continue to live with NDIS participants;
    - COS participants will not be forced into aged care;
    - Appropriate choice and control with regards to living arrangements.
  - Consideration should be given to SDA equivalent funding for COS participants to be administered through NDIS. This would ensure greater consistency in funding approach and not have a duplicate system in place. Under this proposal DOH would reimburse NDIA for COS participants that are supported under the NDIS.