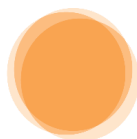




Specialist Disability Accommodation Provider Experience Survey

June 2022



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Acronyms

| | |
|-------------|--------------------------------------|
| AAT | Administrative Appeals Tribunal |
| AT | Assistive Technology |
| SDA | Specialist Disability Accommodation |
| SIL | Supported Independent Living |
| NDIA | National Disability Insurance Agency |
| NDIS | National Disability Insurance Scheme |
| OOA | On-site Overnight Assistance |

Executive Summary

Participants in the National Disability Insurance Scheme (NDIS) who have an extreme functional impairment and/or very high support needs may be eligible for funding for Specialist Disability Accommodation (SDA). SDA is housing designed to meet the needs of eligible participants by increasing their independence, general wellbeing, and social and economic participation. SDA policies and payments create a demand-driven market, where private capital finances the build of SDA, and where NDIS participants who have SDA funding in their NDIS plans make decisions about where they want to live.

The National Disability Insurance Agency (NDIA) estimates that up to 6% of all NDIS participants, or over 30,000 people, are likely eligible for SDA funding.¹ Nearly 6 years after the rollout of SDA payments, it was anticipated by now that SDA providers would simply need to advertise their vacancies, and that NDIS participants with SDA funding in their plans would apply to become tenants. It was also expected that the real and available demand for SDA – participants with the funding in their plans – would be approximating the predicted 30,000 participants eligible for SDA. As of March 2022, however, only 17,693 people have SDA funding allocated in their plans, meaning that real and available demand for SDA is approximately 12,000 people less than expected.² The stark difference between expected and real demand is a challenge to SDA providers and investors who have committed to a pipeline of SDA properties and now face uncertainty over whether they will be able to tenant their properties. Further, a lack of information about the housing needs and preferences of the remaining 12,000 people is making it difficult for SDA developers and investors to make informed decisions about the SDA they should supply.

The stability of the market is also being undermined by rising vacancies in New Build SDA. With over 2,600 new SDA due to enter the market in the next few years,³ the risk that many will remain empty is increasing. These concerns are not an indication that the predicted demand of 30,000 people eligible for SDA funding was an overestimation. Rather, the mismatch between supply and demand is due in part to systemic issues. One such issue is a lack of ‘demand activation’, being the need to identify the remaining SDA eligible participants, support them to understand their housing options and articulate their needs and preferences. Other systemic issues include NDIA decision-making and administrative inefficiencies.

In the last 12 months, a growing body of anecdotal and survey evidence has emerged that indicates that administrative issues at the NDIA may be contributing to challenges in the market. Many participants are experiencing long delays and frustrations when trying to access SDA funding.⁴ SDA providers are reporting rising vacancies and low confidence in the SDA market.⁵ Investment fund managers financing SDA providers also point to a lack of effective market

¹ Commonwealth of Australia (2021). *Senate Community Affairs Legislation Committee: Answers to questions on notice*. Social Services Portfolio. NDIA SQ21-000118.

<https://www.aph.gov.au/api/qon/downloadattachment?attachmentId=be23f5a1-fbba-41f9-a389-e3cb9737563a>

² NDIA (2022). *NDIS quarterly report to disability ministers: Q3 2021-2022*. National Disability Insurance Agency. Figure P. 1. <https://www.ndis.gov.au/about-us/publications/quarterly-reports>

³ Ibid, Table P. 10.

⁴ Skipsey, M., Winkler, D., Cohen, M., Mulherin, P., Rathbone, A., Efstathiou, M. (2022). *Housing delayed and denied: NDIA decision-making on Specialist Disability Accommodation*. Public Interest Advocacy Centre and Housing Hub. <https://apo.org.au/node/317588>

⁵ Aimers, N., Rathbone, A., Winkler, D., Wellecke, C., & Mulherin, P. (2022). *CHPs and disability housing: An exploration of SDA*. Housing Hub and Summer Foundation. <https://apo.org.au/node/317170>; Winkler, D., Aimers, N., Rathbone, A., Douglas, J., Wellecke, C., Goodwin, I., & Mulherin, P. (2021). *Specialist Disability Accommodation provider experience survey*. Housing Hub and Summer Foundation. <https://apo.org.au/node/316937>

stewardship by the NDIA.⁶ These issues are creating a supply and demand imbalance – the number of empty SDA properties is rising far quicker than the number of participants receiving SDA funding.

In order to understand current market sentiment and highlight key areas of concern from the SDA provider perspective, the Housing Hub conducted a survey of SDA providers in April 2022. In total, 28 providers completed the survey and reflected on their experiences of providing SDA. Between them, these providers were offering 1,281 places for tenants in their 671 New Build SDA dwellings. Together, they had committed over \$1.5 billion in capital to build new SDA properties, accounting for nearly half of the total value of the SDA market.⁷ Key findings of the survey and recommended actions for the NDIA are provided below.

Key findings

- **48.2%** of providers said it takes **at least 6 months** to fill a single vacancy (compared to **29.7%** of providers in the 2021 *SDA Provider Experience Survey*)
- **63.0%** said it takes **at least 6 months** to fill all vacancies in a project/development (compared to **56.8%** in 2021)
- Providers reported that it is **taking longer to fill vacancies** than last year
- **77.8%** said the time taken by the NDIA to make SDA decisions is **extremely challenging** (compared to **73.0%** in 2021)
- **81.5%** were receiving less than anticipated income for some of their SDA (compared to **83.8%** in 2021)
- 9 providers reported they were owed over **\$2.1 million** in SDA payments from the NDIA for more than **90 days** (compared to 9 providers reporting they were owed over **\$3.7 million** for more than 90 days in 2021)

Recommendations

1. **Improve clarity on the demand side of the SDA market** – Providers and investors need more transparency on current and anticipated demand for SDA. To this end, the NDIA should provide more detailed information on demand profiles, such as publishing the required building type and design category alongside desired location for participants currently seeking SDA. This should also include the NDIA's expectations of future demand.
2. **Use the available supply of SDA** – NDIS participants need to be approved for funding to move into the hundreds of vacant SDA properties currently on the market.
3. **Enhance the quality of SDA funding decisions** – SDA approvals should align with participants' needs and preferences to prevent lengthy appeals and prolonged vacancies.
4. **Enhance the transparency of SDA funding decisions** – The Home and Living Panel should provide explanations for funding decisions made, as well as clear criteria around the eligibility for different funding types and the evidence required.

⁶ Madhavan, D., Mulherin, P., Winkler, D. (2021). *Specialist Disability Accommodation (SDA) investor think tank: Findings and recommendations*. Summer Foundation. <https://apo.org.au/node/313679>

⁷ Calculated based on the number of enrolled SDA (excluding 'in-kind' arrangements with state governments) multiplied by an approximate cost per dwelling: 6,858 dwellings * \$500,000 per dwelling = \$3.43 billion.

5. **Improve communication of SDA funding requests and approval processes** – Providers should have access to officers in the NDIA that act as a point of contact for an NDIS participants' SDA application. Whilst maintaining the privacy of the NDIS participant, providers could work with this contact person to help progress SDA applications and resolve any issues as they emerge.
6. **Reduce decision-making times for housing and support funding** – The Home and Living Panel should commit to clear timeframes for making funding decisions, including a target of 10 days for requests from priority cohorts, such as participants in hospital, or participants in a high risk situation in residential aged care. It should track and regularly publish data on the time taken to make these decisions – from the date the SDA request is made to when it is communicated to the participant.
7. **Clarify the process of requesting housing and support funding** – The Home and Living Panel should publish the steps in the process of requesting funding, from the participant's perspective.
8. **Ensure SDA payments are accurate and paid on time** – SDA providers should receive the correct amount of payments in a timely manner to help reduce financial risks. This could partly be achieved by the NDIA enhancing the efficiency and reducing the processing times for ongoing administrative tasks, such as plan reviews and service bookings.
9. **Release vacancy data** – To alleviate investor and provider concerns about escalating vacancy rates, the NDIA should release detailed vacancy data in *SDA Quarterly Reports*. This should include breakdowns by building type, design categories, occupancy, and location. NDIA observations on vacancy trends and expectations of future vacancies should be provided to help inform supply and increase market stability.

Introduction

The lives of thousands of people living with disability are being transformed with access to Specialist Disability Accommodation (SDA), funded through the National Disability Insurance Scheme (NDIS). Research shows that a well-designed SDA home in the right location can allow for more independent living arrangements, improved wellbeing, greater community connection and access to informal supports.⁸ SDA funding provides housing payments for people with 'extreme functional impairment or very high support needs' in order to help maximise their wellbeing and independence.⁹ NDIS participants found eligible for SDA can use their funding to choose a dwelling that meets their SDA budget from a registered provider to suit their needs and preferences. This market-based model is designed to deliver better and more person-centred housing outcomes for people with very high and complex disability support needs.

In order to receive payments, registered SDA providers must enrol their dwellings with the National Disability Insurance Agency (NDIA). To enrol SDA, providers submit information on the building type, occupancy, design category, number of bedrooms and location of the dwelling (see Appendix A).¹⁰ In 2018, the NDIA stated that SDA payments were expected to total approximately \$700 million per year when the SDA policy was fully implemented.¹¹ According to SDA investment fund managers, the SDA market could grow to be worth in excess of \$12 billion,¹² once the 6% of all NDIS participants expected to be eligible for SDA – approximately 30,000 people – have this funding in their NDIS plans.¹³

As of March 2022, there were 301 registered and active SDA providers in the market. There were over 6,858 enrolled SDA dwellings, equating to at least 19,000 places for NDIS participants. There were also a further 2,612 new SDA being built around the country, equating to over 4,500 places.¹⁴ Despite the expected future size of the market, the market value is only around \$3.5 billion to date.¹⁵ And while expected demand is 30,000 people, only 17,693 participants had SDA funding allocated in their plans as of March 2022 and only \$248 million of the expected \$700 million had been allocated.¹⁶ Moreover, an analysis of line items payments for 12 months to March 2022 shows that SDA payments had been made for only 11,752 participants, despite the 17,693 with SDA funding in their plans.¹⁷ The stark difference between expected and real demand is a challenge to SDA providers and investors trying to make informed decisions about the SDA they should supply.

⁸ Douglas, J., Winkler, D., Oliver, S., Liddicoat, S., D'Cruz, K. (2022). Moving into new housing designed for people with disability: Preliminary evaluation of outcomes. *Disability and Rehabilitation*.
<https://www.tandfonline.com/doi/full/10.1080/09638288.2022.2060343>

⁹ NDIA (2022). *Specialist Disability Accommodation: Operational guideline*. National Disability Insurance Agency.
<https://ourguidelines.ndis.gov.au/supports-you-can-access-menu/home-and-living-supports/specialist-disability-accommodation>

¹⁰ Ibid.

¹¹ NDIA (2018). *SDA provider and investor brief*. National Disability Insurance Agency.
<https://blcw.dss.gov.au/media/1099/ndia-specialist-disability-provider-update.pdf>

¹² Madhavan et al. (2021). *Specialist Disability Accommodation (SDA) investor think tank: Findings and recommendations*. Summer Foundation.

¹³ Commonwealth of Australia (2021). *Senate Community Affairs Legislation Committee: Answers to questions on notice*. Social Services Portfolio. NDIA SQ21-000118.
<https://www.aph.gov.au/api/qon/downloadattachment?attachmentId=be23f5a1-fbba-41f9-a389-e3cb9737563a>

¹⁴ NDIA (2022). *NDIS specialist disability accommodation 2021-22 quarter 3 report*. National Disability Insurance Agency, Table 6.
<https://data.ndis.gov.au/media/3430/download?attachment>

¹⁵ Assumption: \$0.5 million per enrolled dwelling (6,858), excluding in-kind. NDIA (2022). *NDIS quarterly report to disability ministers: Q3 2021-2022*. National Disability Insurance Agency.

¹⁶ Ibid.

¹⁷ NDIA (2022). *Average support line item payments: March 2022*. National Disability Insurance Agency.
<https://data.ndis.gov.au/media/3426/download?attachment>

Anecdotal evidence received from SDA market stakeholders has indicated that some providers are under significant financial pressure due to challenges they are facing. In order to document these concerns, in 2021 the Housing Hub conducted the first *SDA Provider Experience Survey*.¹⁸ The survey uncovered a range of commercial challenges, including rising vacancies, delayed payments from the NDIA and problems finding tenants. Since then, additional survey data has been released that continues to highlight challenges in the market, including low provider confidence.¹⁹ Similarly, investment fund managers raising capital to finance SDA providers highlight a lack of appropriate market stewardship from the NDIA, as well as an emerging supply and demand imbalance.²⁰

The potential for costly vacancies in SDA dwellings is a risk accepted by SDA providers and investors, but when vacancies are prolonged and more widespread than anticipated, it poses considerable financial risk. This in turn negatively affects market confidence and undermines the stability of the SDA market. The NDIA's *Pricing Arrangements* for SDA assumes a vacancy rate of 3-7% for SDA with 1-3 residents, and 3-10% for group homes with 4 or more residents.²¹ The NDIA's SDA Finder webpage, however, indicates over 600 vacancies in SDA nationally,²² while both the Housing Hub and Nest property listing sites indicate there are over 1,000 vacancies in SDA.²³ Reporting vacancies on all 3 of these sites is voluntary for SDA providers, so it can be surmised that the real number of vacancies is higher. Despite the high number of vacancies, as of March 2022 there were 4,746 participants with SDA funding in their plans who were seeking an SDA dwelling.²⁴ While this appears to show there are participants with SDA in their plans seeking housing, it is important to note that only 2,088 of this number are not currently living in SDA²⁵ and it is understood that a large proportion of these people have already identified an SDA property they wish to live in and are awaiting funding decisions relating to support that will enable them to move in. Therefore, the high vacancy rates cannot be attributed to insufficient demand. Instead it suggests issues with funding decisions and administrative inefficiencies at the NDIA.

Another factor demonstrating a lack of demand activation of SDA that is compounding the vacancy risk is the low amount of SDA funding currently allocated in NDIS plans (\$248m compared to an estimated \$700m when all 30,000 SDA eligible participants are identified). This amount also indicates that the 17,693 participants approved for SDA payments are receiving on average just over \$14,000 each per year. This means that the average participant receiving SDA funding cannot afford to move into any New Build SDA, other than an Improved Liveability group home for 5 residents.²⁶ The average participant only receives enough funding to live in either group homes or older Existing and Legacy stock. Given that payments for Legacy stock cease 5-10 years after enrolment,²⁷ and that there are currently over 1,600 places in Legacy SDA,²⁸ the Agency will need

¹⁸ Winkler et al. (2021). *Specialist Disability Accommodation provider experience survey*. Housing Hub and Summer Foundation.

¹⁹ Aimers, N., Rathbone, A., Winkler, D., Wellecke, C., & Mulherin, P. (2022). *CHPs and disability housing: An exploration of SDA*. Housing Hub and Summer Foundation. <https://apo.org.au/node/317170>; Aimers, N., Wellecke, C., Winkler, D., Rathbone, A., & Mulherin, P. (2021). *Specialist Disability Accommodation – Supply in Australia: November 2021*. Housing Hub and Summer Foundation. <https://apo.org.au/node/314855>

²⁰ Madhavan et al. (2021). *Specialist Disability Accommodation (SDA) investor think tank: Findings and recommendations*. Summer Foundation.

²¹ NDIA (2022). *NDIS pricing arrangements for Specialist Disability Accommodation 2021-22*. National Disability Insurance Agency. <https://www.ndis.gov.au/providers/housing-and-living-supports-and-services/specialist-disability-accommodation/sda-pricing-and-payments>

²² Available at: <https://www.ndis.gov.au/participants/home-and-living/specialist-disability-accommodation-explained/sda-finder>

²³ Listings include dwellings that are yet to be completed. Nest is available at: <https://gonest.com.au/> Housing Hub is available at: <https://www.housinghub.org.au/>

²⁴ NDIA (2022). *NDIS quarterly report to disability ministers: Q3 2021-2022*. National Disability Insurance Agency. Table P. 12.

²⁵ Ibid.

²⁶ Improved Liveability (no OOA), group home, 5 residents: \$13,862 per participant. NDIA (2022). *NDIS pricing arrangements for Specialist Disability Accommodation 2021-22*. National Disability Insurance Agency.

²⁷ NDIA (2021). *NDIS pricing arrangements for Specialist Disability Accommodation 2021-22*. National Disability Insurance Agency.

²⁸ NDIA (2022). *NDIS quarterly report to disability ministers: Q3 2021-2022*. National Disability Insurance Agency. Table P. 4.

to increase funding amounts for a large proportion of participants to enable them to move into New Build SDA in coming years. Moreover, there are at least 2,612 new SDA dwellings currently being built, including over 4,000 places in SDA for 1-3 residents,²⁹ meaning vacancy rates are likely to increase across all New Build SDA given current average payment amounts.

Delayed decision-making by the NDIA's Home and Living Panel is also contributing to prolonged vacancies. Data from the Agency reveals that 4,990 applications for housing and associated supports were completed by Home and Living Panels in the quarter to March 2022. Of these, 45% were completed in over 60 days. In addition, 4,759 applications were still open with the Panel, and of these, 24% had been open for over 90 days.³⁰ A recent report by the Public Interest Advocacy Centre and the Housing Hub also presents findings on decisions, wait times, and systemic issues with NDIA decision-making for SDA funding.³¹ It finds that for 172 participants assisted by the Housing Hub to request SDA funding, only 26% received an initial NDIA decision that aligned with their request, with a median wait time of 96 days. Many of those who did not receive the funding they had requested pursued an internal NDIA review with a median wait time of a further 99 days for a decision. Participants who still did not receive the funding they requested could then submit an appeal to the Administrative Appeals Tribunal (AAT). These reviews are costly, time-consuming, and stressful for all involved and further extend an already lengthy process.

To better understand the ongoing challenges facing SDA providers, the Housing Hub created this report, the second iteration of the *SDA Provider Experience Survey* in April 2022. Similar to the first iteration of this survey released in May 2021,³² it aimed to understand the experiences of SDA providers, including the commercial risks they face when operating in the SDA market.

²⁹ NDIA (2022). *NDIS specialist disability accommodation 2021-22 quarter 3 report*. National Disability Insurance Agency, Table 6, 7.

³⁰ NDIA (2022) *NDIS quarterly report to disability ministers: Q3 2021-2022*. National Disability Insurance Agency, p. 64.

³¹ Skipsey et al. (2022). *Housing delayed and denied: NDIA decision-making on Specialist Disability Accommodation*. Public Interest Advocacy Centre and Housing Hub.

³² Winkler et al. (2021). *Specialist Disability Accommodation provider experience survey*. Housing Hub and Summer Foundation.

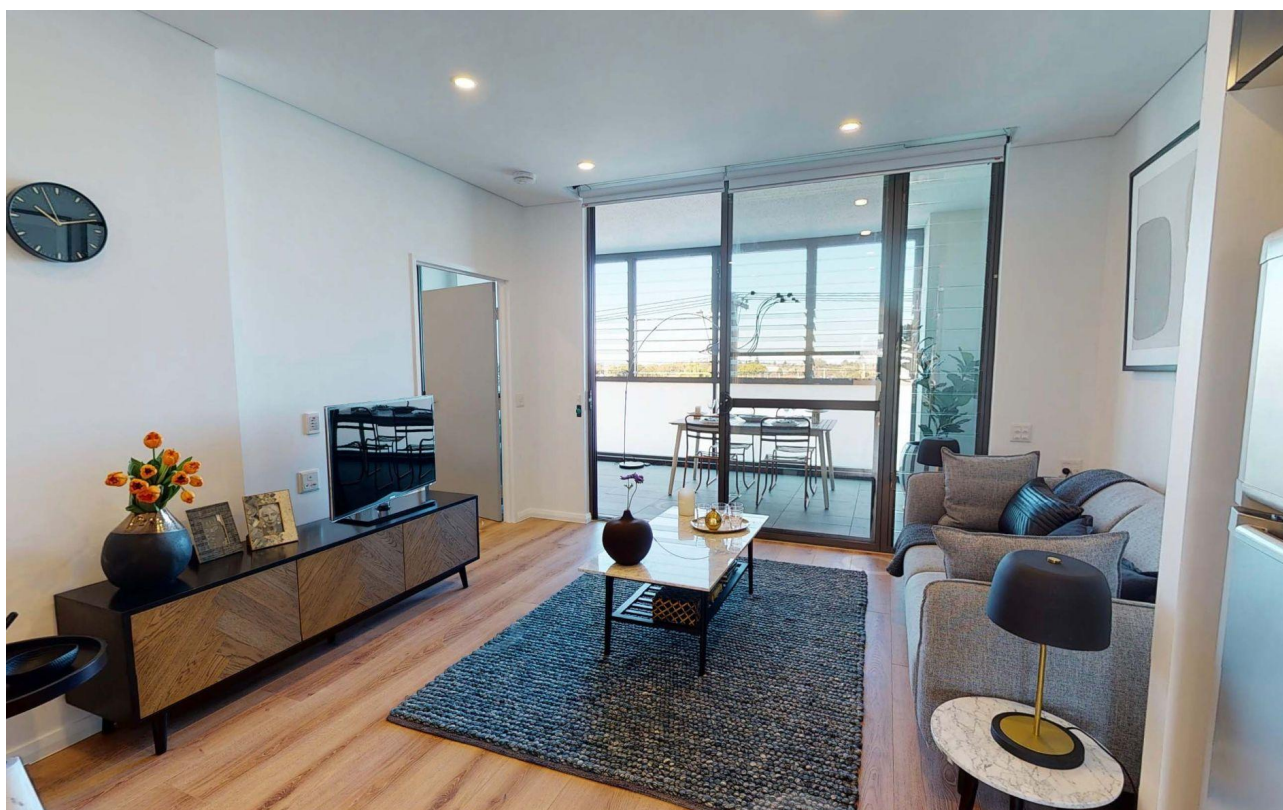
Method

This study involved an online survey of SDA providers in Australia, and followed similar methods to the previous provider experience survey.³³ Providers were recruited via email as well as social media posts on LinkedIn. Providers' email addresses were drawn from multiple sources, such as the NDIS list of SDA providers, Housing Hub housing providers, and PowerHousing Australia membership. The survey was conducted on QuestionPro and remained open for 3 weeks, from 11 April 2022 to 3 May 2022.

The survey consisted of 32 questions and took approximately 15 minutes to complete. Survey questions were similar to the previous survey,³⁴ and asked providers to reflect on their experiences in the SDA market, including:

- Challenges related to vacancies and leasing SDA
- Financial risks, including securing the timely payment of SDA funds by the NDIA
- Navigating NDIA SDA processes once tenants have moved in

Two open-ended questions also invited respondents to suggest improvements to the SDA market and reflect on what was working well in the market. Providers were advised that their participation was voluntary, their responses were strictly confidential, and only aggregated data and de-identified open responses would be published. Quantitative and qualitative data were analysed using Excel. For respondents who had also participated in the 2021 *SDA Provider Experience Survey*, changes in their responses to vacancy and financial risks were also investigated.



³³ Winkler et al. (2021). *Specialist Disability Accommodation provider experience survey*. Housing Hub and Summer Foundation.

³⁴ Ibid.

Results

Sample

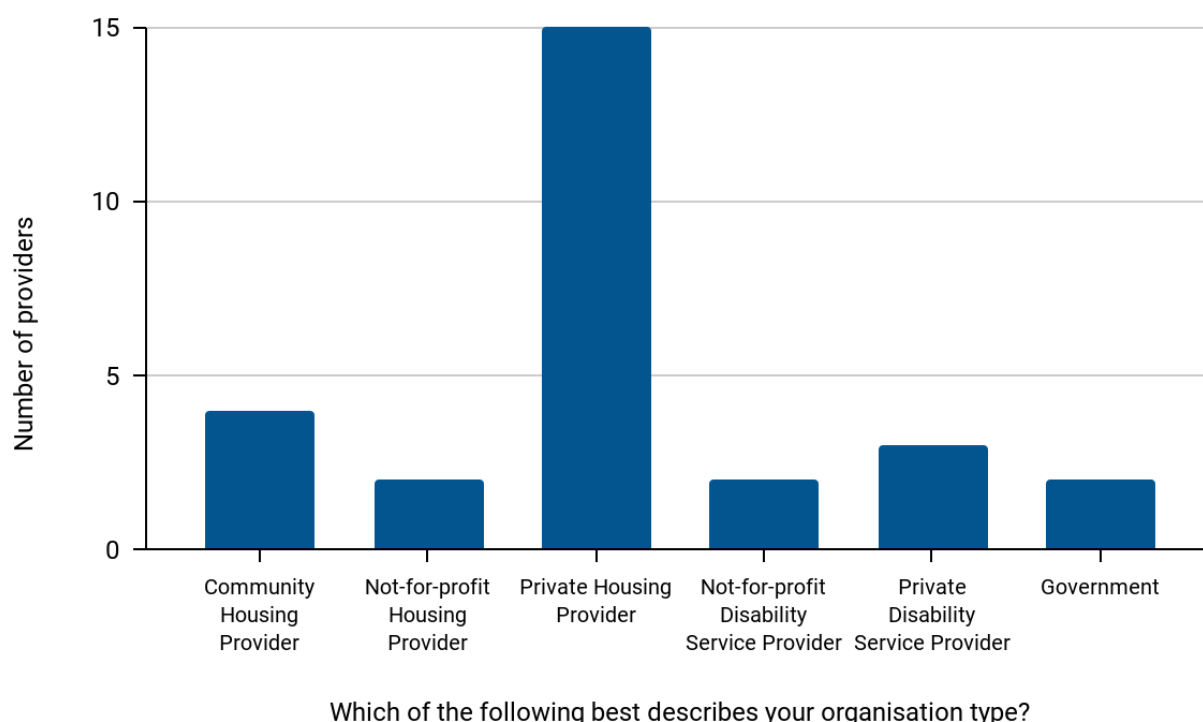
A total of 41 SDA providers attempted the survey. Of those, 4 responses were duplicates,³⁵ and 9 responses provided insufficient information to be included.³⁶ These responses were excluded from data analysis, leaving a final sample of 28 respondents. The descriptive statistics for responses are presented below.

Description of the sample

Organisation type

As can be seen in Figure 1, over half of the organisations were private housing providers (53.6%). This was followed by a smaller number of community housing providers (14.3%) and private disability service providers (10.7%). The survey also included perspectives from government SDA organisations (7.1%), which were not represented in the 2021 *SDA Provider Experience Survey*.³⁷

Figure 1 – Organisation type of respondents (n = 28)



Enrolled New Build SDA dwellings and places

Nationally, 2,543 New Build SDA dwellings were enrolled with the NDIA as of March 2022.³⁸ The 28 providers in this survey reported supplying a combined total of 671 enrolled New Build SDA dwellings with 1,281 SDA places. Therefore, survey respondents provide more than one-quarter (26.4%) of all New Build SDA dwellings in the market.

³⁵ That is, the same organisation completed the survey twice.

³⁶ That is, they only provided information about their organisation but did not respond to key questions assessing commercial risks.

³⁷ Winkler et al. (2021). *Specialist Disability Accommodation provider experience survey*. Housing Hub and Summer Foundation.

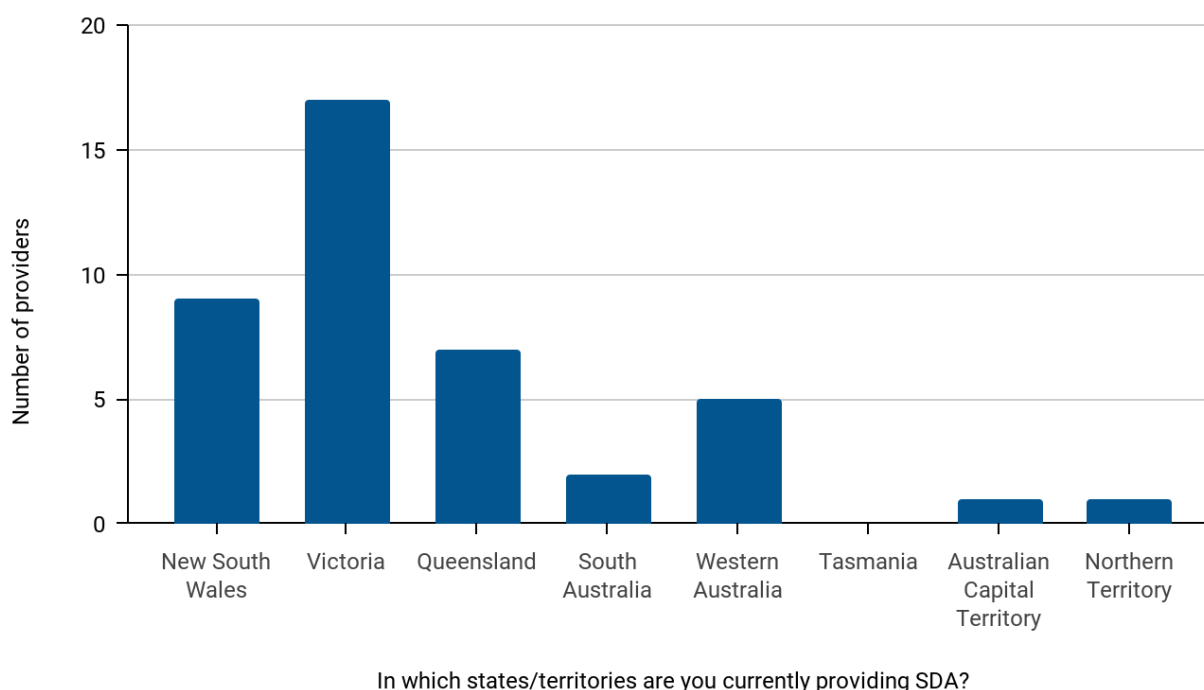
³⁸ NDIA (2022). *NDIS quarterly report to disability ministers: Q3 2021-2022*. National Disability Insurance Agency. Table P. 4.

Location

Respondents were providing SDA in almost all jurisdictions (see Figure 2). The majority of respondents reported that they currently supply SDA in Victoria (60.7%), followed by New South Wales (32.1%), Queensland (25.0%), and Western Australia (17.9%). Very few respondents were supplying SDA in South Australia (7.1%), the Northern Territory (3.6%) and the Australian Capital Territory (3.6%). No respondents were currently supplying SDA in Tasmania.

The distribution of respondents' SDA supply is largely consistent with the national distribution of SDA dwellings. According to the NDIA, the states with the most national SDA supply are New South Wales and Victoria, and those with the least supply are the Northern Territory, Tasmania, and the Australian Capital Territory.³⁹ However, only a few respondents in this survey were supplying SDA in South Australia, even though this state has the third most SDA supply in Australia according to the NDIA.⁴⁰ SDA providers in South Australia may be underrepresented in the current survey, and/or SDA providers in South Australia may on average have a higher number of SDA properties enrolled.

Figure 2 – Number of respondents supplying SDA housing in each state and territory in Australia (n = 28). *Note: Respondents were able to select multiple options.*



³⁹ NDIA (2022). *NDIS quarterly report to disability ministers: Q3 2021-2022*. National Disability Insurance Agency. Table P. 4.

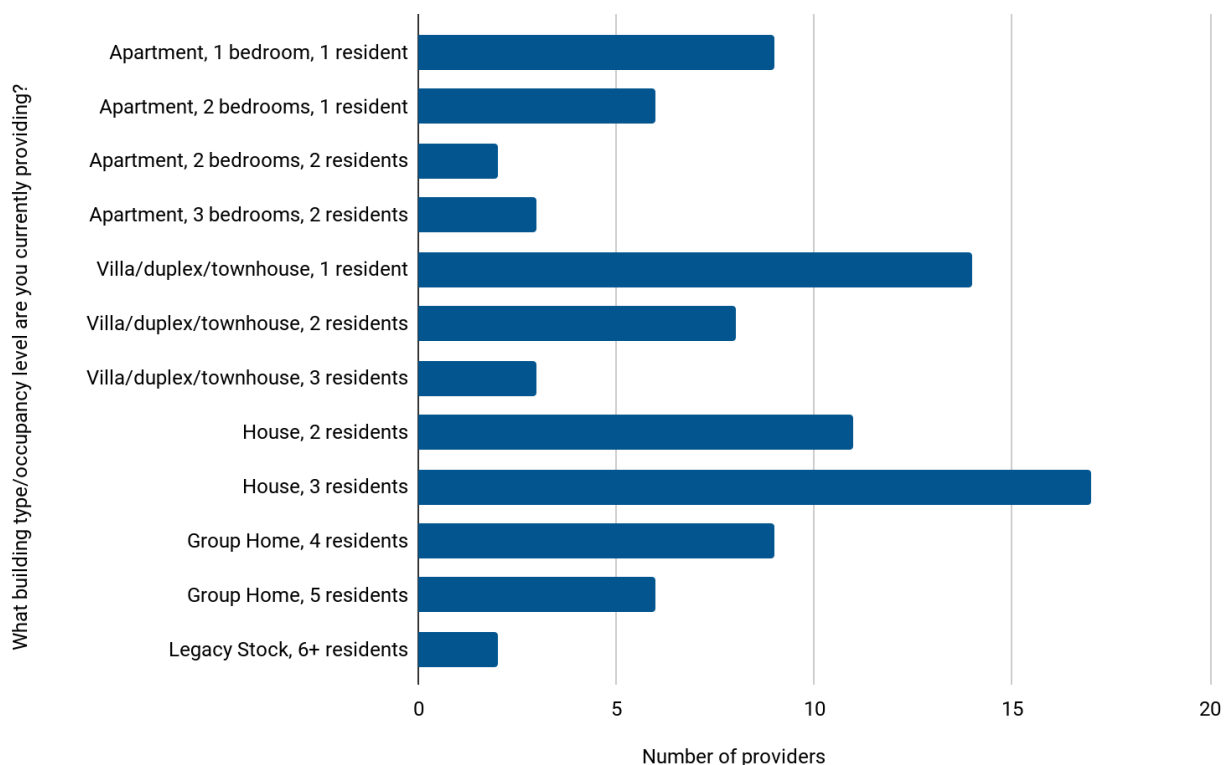
⁴⁰ Ibid.

Building type

As shown in Figure 3, the most commonly supplied dwelling types by respondents were 3 resident houses (60.7%), 1 resident apartments (53.5%) and 1 resident villa/duplex/townhouses (50.0%). This is consistent with the SDA supply report released in November 2021, where 1 resident apartments and 1 resident villa/duplex/townhouses were found to be the dominant build types in the SDA pipeline.⁴¹ The current survey found that Legacy stock for 6+ residents and 2 resident apartments with 2 bedrooms were supplied by the least number of survey respondents (7.1% each).

Figure 3 – Number of respondents supplying each building type and configuration (n = 28).

Note: Respondents were able to select multiple options.



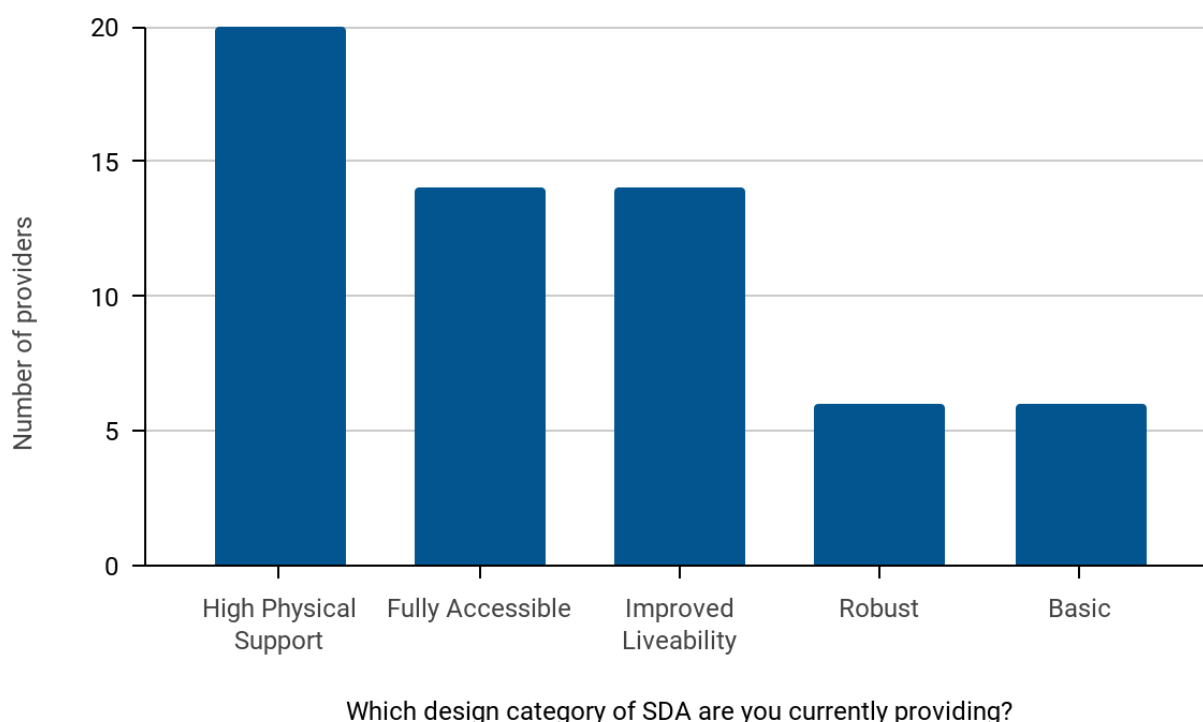
⁴¹ Aimers et al. (2021). *Specialist Disability Accommodation – Supply in Australia: November 2021*. Housing Hub and Summer Foundation.

Design category

Respondents were also asked to indicate which design categories of SDA they are currently providing (see Figure 4). The majority of respondents selected High Physical Support (71.4%), followed by Improved Liveability (50.0%) and Fully Accessible (50.0%). Less than a quarter of respondents provided Robust (21.4%) and Basic (21.4%).

This differs slightly from the design categories reported by the NDIA,⁴² where Basic design is the most commonly supplied design category across all enrolled SDA dwellings in Australia. This suggests that providers of Existing and Legacy stock are underrepresented in this survey. However, the distribution of the other design categories is overall comparable to NDIA data, with High Physical Support being one of the most commonly supplied design categories, and Robust being the least supplied category.

Figure 4 – Number of respondents supplying each design category of SDA housing (n = 28).
Note: Respondents were able to select multiple options.



Committed capital to New Build SDA

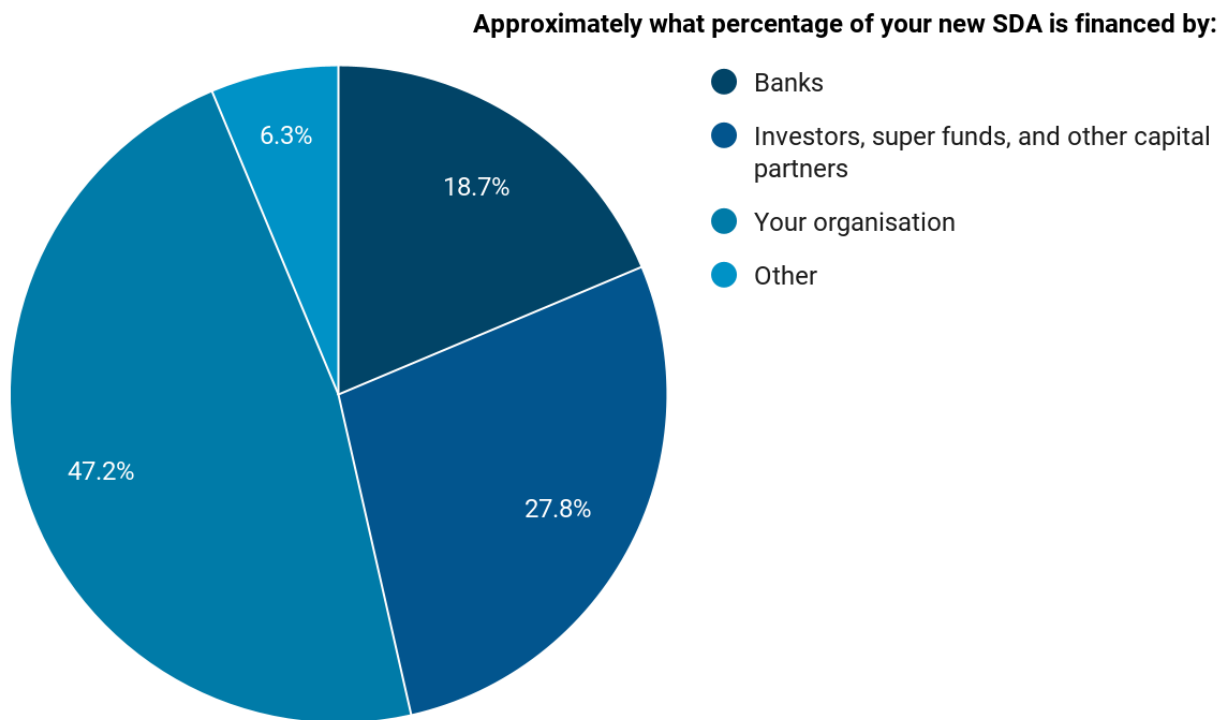
Twenty-six respondents reported the amount of capital they have committed to building new SDA. Together, these respondents have committed a total of \$1,532,238,888 (approximately \$1.5 billion). There was a large variation between individual respondents in the amount of capital committed – the highest amount reported was \$750 million, while 3 respondents indicated not having committed any capital to new SDA. However, 2 out of these latter 3 respondents reported supplying New Build SDA dwellings, so these respondents have likely invested capital in new SDA but did not disclose the amount in this survey.

⁴² NDIA (2022). *NDIS quarterly report to disability ministers: Q3 2021-2022*. National Disability Insurance Agency. Table P. 5.

Financing of New Build SDA

Funding sources for new SDA were also explored in this survey. As can be seen in Figure 5, an average of 47.2% of respondents' New Build SDA was funded by their own organisation, making this the primary funding source. On average, less funding was supplied by investors, super funds, and other capital partners (27.8%), or banks (18.7%). Respondents were also offered the option to indicate other sources of funding – these made up an average of 6.3% of funding for new SDA and were composed of grants and fundraising.

Figure 5 – Average percentage of funding sources for New Build SDA (n = 28)



Challenges related to vacancies and leasing SDA

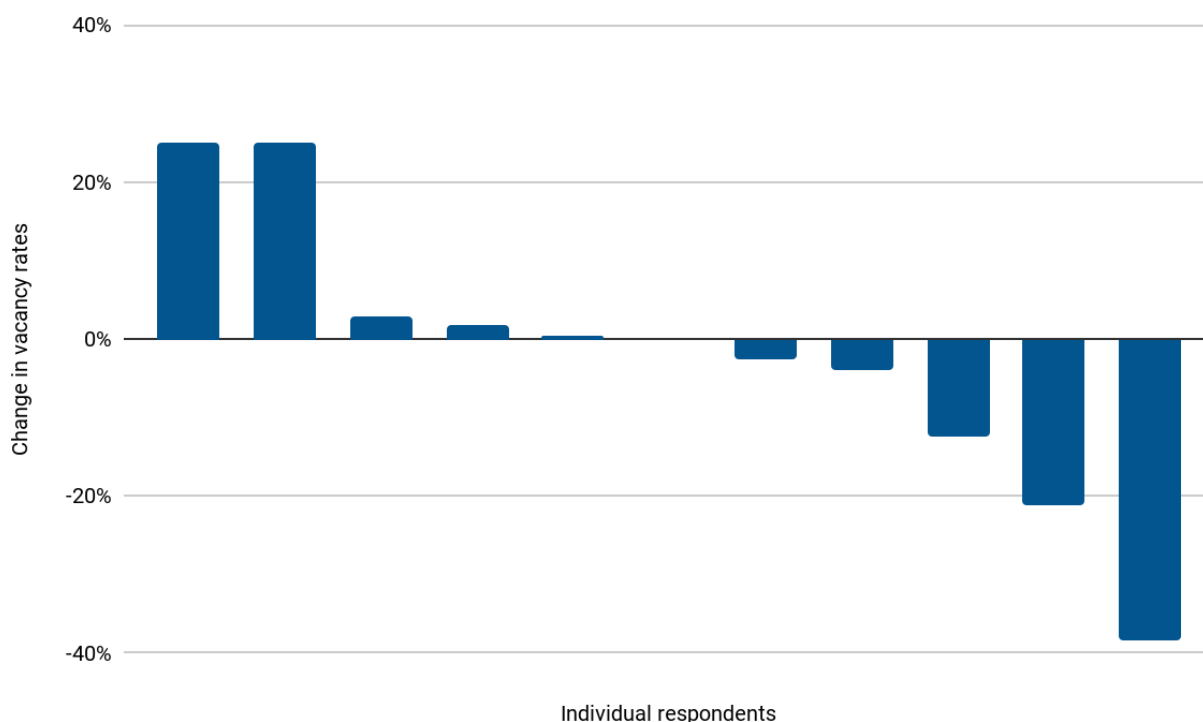
Vacancy rates for New Build SDA

Out of the 1,281 New Build SDA places that respondents had enrolled with the NDIA, almost a quarter (22.1%; 283 places) were reported to be vacant.

Changes in vacancy rates between 2021 and 2022

Eleven respondents have reported their vacancies in New Build SDA in both the 2021 and 2022 *SDA Provider Experience Survey*. For these respondents, changes in their vacancy rates from 2021 compared to 2022 could be investigated (see Figure 6). Almost half of the respondents (45.5%) experienced an increase in their vacancy rates. Of these, 2 respondents had vacancy rates that were 25 percentage points higher in 2022 compared to 2021. Three respondents experienced much smaller increases in their vacancy rates and one respondent did not experience any change in their vacancy rate. The remaining respondents (45.5%) experienced a reduction in their vacancy rate of between 3 to 38 percentage points.

Figure 6 – Individual changes in vacancy rates in New Build SDA between 2021 and 2022. Each bar represents the change in vacancy rates for one respondent. Positive percentages indicate an increase in a provider's vacancy rate; negative percentages indicate a decrease in a provider's vacancy rate (n = 11).

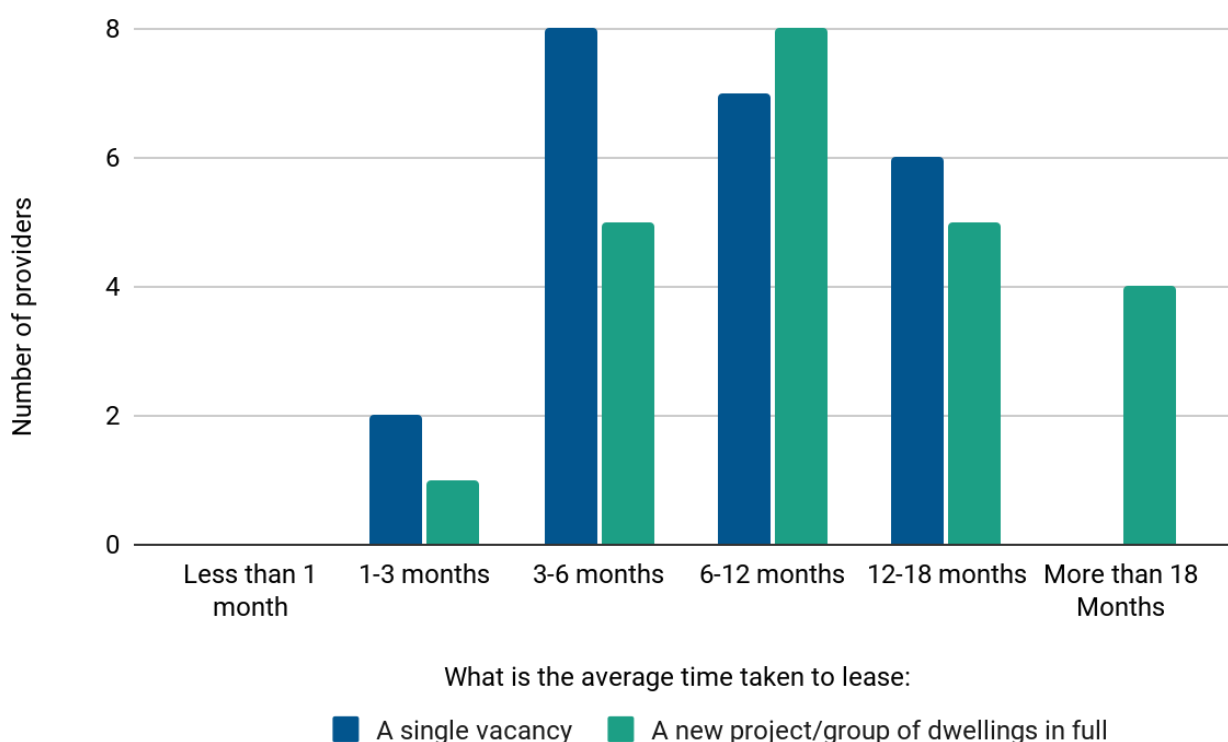


Time taken to lease SDA properties

Figure 7 presents the average time taken to fill a single vacancy (from time of tenant moving out to when a new tenant moves in), and the average time taken to lease a new project/group of dwellings in full (from time of advertising to all dwellings being filled). The most common time length to lease a single vacancy was 3-6 months, reported by almost one-third of respondents (29.6%). Almost half of the respondents (48.2%) reported that it generally took more than 6 months to fill a single vacancy (compared to 29.7% of respondents in last year's *SDA Provider Experience Survey*).⁴³ No respondent in the current survey reported that it generally took less than 1 month.

In comparison, the most common time length to lease a new project/group of dwellings in full was 6-12 months (29.6%). The majority of respondents (63.0%) reported it generally took more than 6 months (which is an increase compared to 56.8% in last year's *SDA Provider Experience Survey*).⁴⁴ Four respondents in the current survey (14.8%) indicated it generally took more than 18 months, and no respondent indicated it took less than 1 month to lease a new project/group of dwellings in full.

Figure 7 – Average time taken for respondents to fill a single vacancy and a new project or group of dwellings in full (n = 23). *Note: Four respondents selected 'not applicable'.*



⁴³ Winkler et al. (2021). *Specialist Disability Accommodation provider experience survey*. Housing Hub and Summer Foundation.

⁴⁴ Ibid.

Changes in the time taken to lease SDA properties between 2021 and 2022

Nine respondents have reported the time it took to fill single vacancies and the time it took to fill a new project/group of dwellings in full in both the 2021 and 2022 *SDA Provider Experience Surveys*. The changes that these respondents have experienced since last year are presented below.

The majority of the respondents (66.7%) experienced an increase in the time taken to fill a single vacancy (i.e., it became slower to fill vacancies), while the remaining one-third of respondents reported no change (see Figure 8). No respondents reported a reduction in the time taken to fill a vacancy.

Figure 9 shows the individual changes that each respondent had experienced. As can be seen, of the respondents who experienced increased timeframes to lease a single vacancy, 4 reported an increase from '3-6 months' to '6-12 months'.

Figure 8 – Percentage of respondents with no change, an increase, and decrease in the time taken to fill a single vacancy between 2021 and 2022 (n = 9)

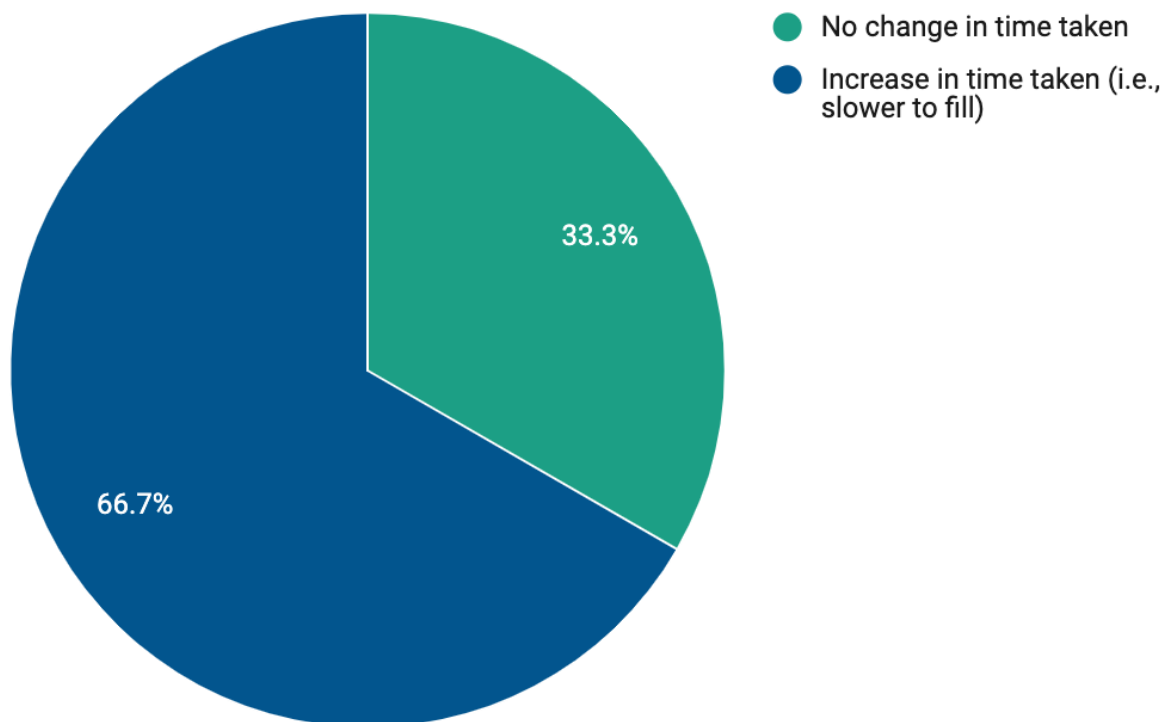
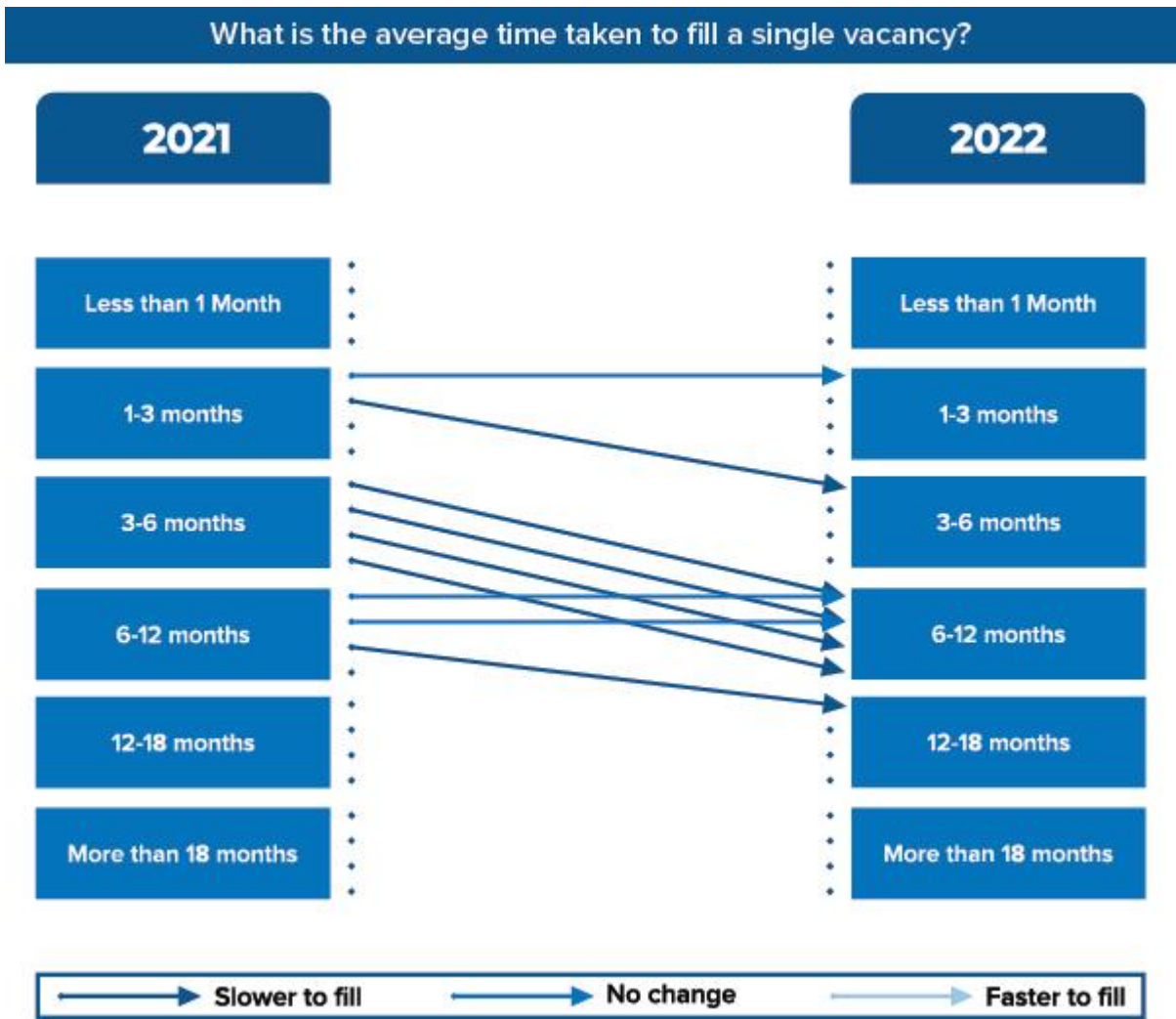


Figure 9 – Individual changes in the time taken to fill a single vacancy between 2021 and 2022. Each line represents the change experienced by one respondent (n = 9).



The time taken to fill a new project/group of dwellings in full increased for 66.7% of respondents (that is, it took longer to fill vacancies) and decreased for 22.2% of respondents (that is, vacancies were filled faster), while 11.1% of respondents experienced no change in the time taken (see Figure 10). Of the respondents who experienced an increase in the time taken, 2 reported a jump from '6-12 months' to 'more than 18 months' (see Figure 11).

Figure 10 – Percentage of respondents who reported no change, an increase, and decrease in the time taken to fill a new project/group of dwellings in full between 2021 and 2022 (n = 9)

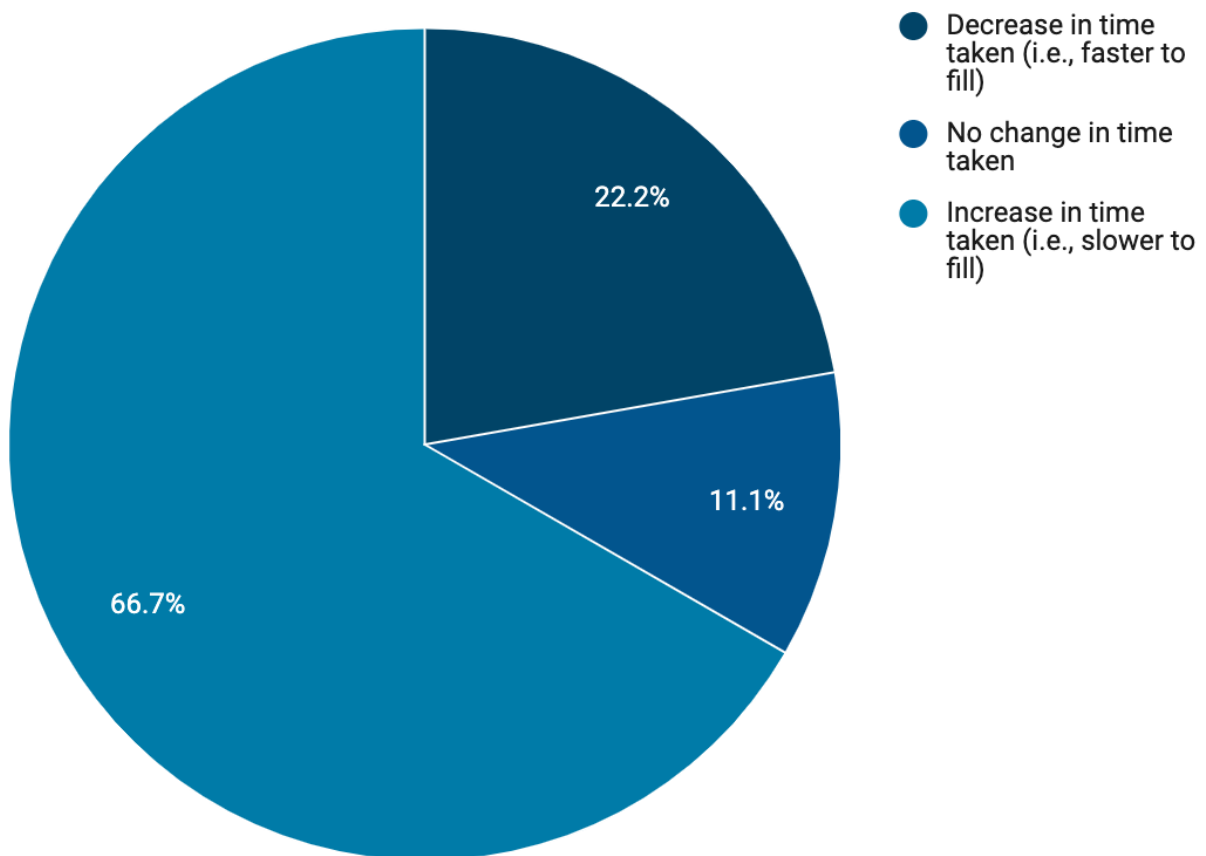
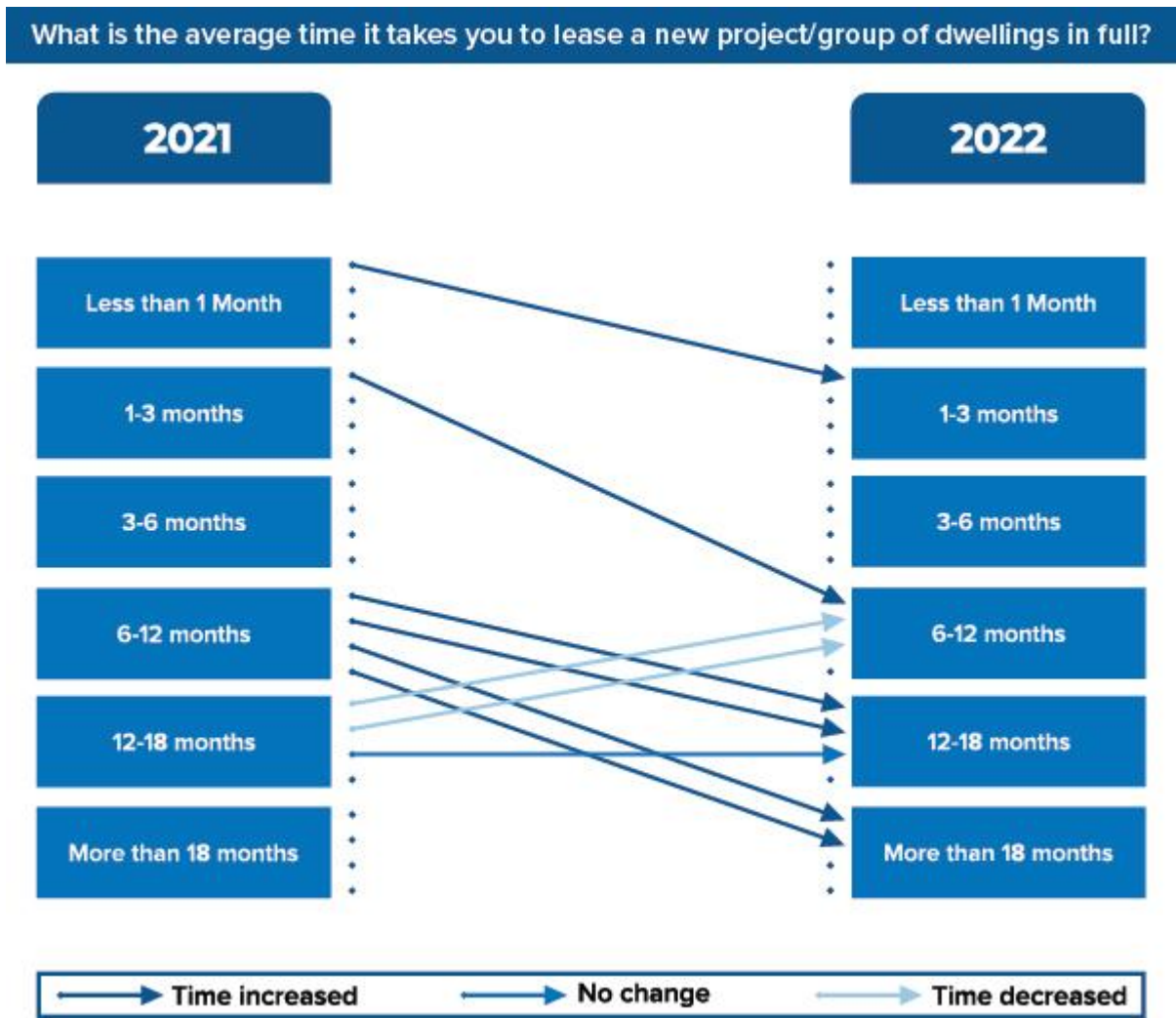


Figure 11 – Individual changes in the time taken to fill a new project/group of dwellings in full between 2021 and 2022. Each line represents the change experienced by one respondent (n = 9).



Challenges related to finding tenants

Providers were asked to reflect on how challenging different aspects of finding SDA tenants were (see Figure 12). The most challenging aspect was finding NDIS participants with the right level of SDA in their plan, with almost two-thirds of respondents reporting this aspect as ‘extremely’ challenging (63.0%). This was consistent with findings from the 2021 *SDA Provider Experience Survey*,⁴⁵ indicating that it remains a key challenge in the market to match SDA funding levels in participants’ plans with SDA supply.

The second most challenging aspect was assessing the SDA eligibility of potential tenants, which was rated as ‘moderately’ or ‘extremely’ challenging by almost half (48.1%) of respondents. It was promising to note that this aspect, however, together with ‘finding tenants who are interested in moving’ and ‘assessing the suitability of tenants for a particular model of housing and support’, appears to have become slightly less challenging compared to last year.⁴⁶

Figure 12 – The extent of various challenges associated with finding tenants (n = 27)

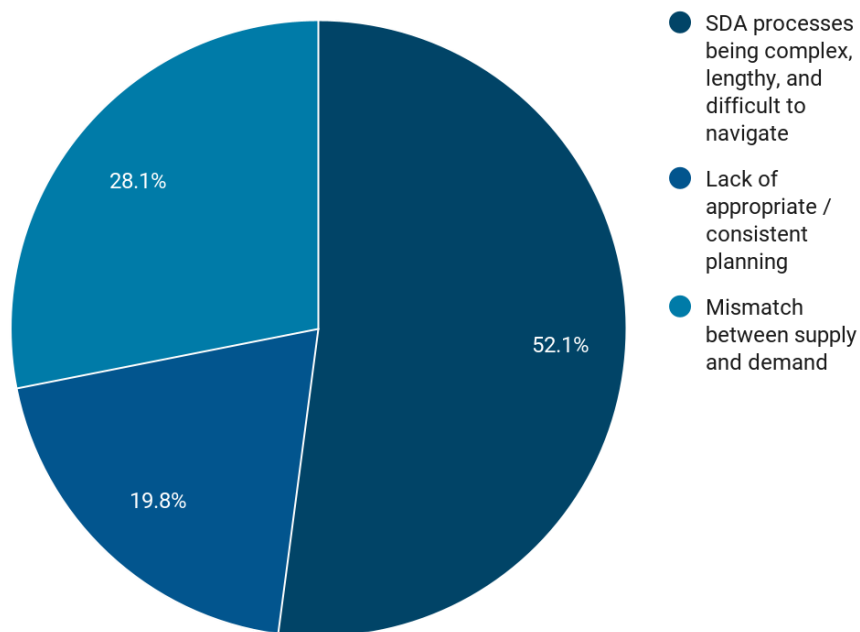
| How challenging are the following aspects of finding tenants for your SDA? | | | | | |
|--|-----------------|----------------------|----------------------|------------------------|-----------------------|
| | Not challenging | Slightly challenging | Somewhat challenging | Moderately challenging | Extremely challenging |
| Finding tenants who are interested in moving | 22.2% | 22.2% | 25.9% | 7.4% | 22.2% |
| Finding tenants with the right level of SDA in their NDIS plan | 7.4% | 3.7% | 3.7% | 22.2% | 63.0% |
| Assessing the SDA eligibility of potential tenants | 18.5% | 11.1% | 22.2% | 22.2% | 25.9% |
| Assessing the suitability of tenants for a particular model of housing and support | 14.8% | 22.2% | 29.6% | 22.2% | 11.1% |

⁴⁵ Winkler et al. (2021). *Specialist Disability Accommodation provider experience survey*. Housing Hub and Summer Foundation.

⁴⁶ Ibid.

Respondents were also given the opportunity to identify the main barriers to finding tenants in an open-ended question, as well as expand on the challenging aspects highlighted in Figure 12. A thematic analysis identified 3 overarching themes. These areas were 'SDA processes being complex, lengthy, and difficult to navigate', 'mismatch between supply and demand' and 'lack of appropriate/consistent planning' (see Figure 13).

Figure 13 – Themes identified from reported barriers to finding tenants (percentage of responders whose response aligned with an identified theme).



The first theme – ***SDA processes being complex, lengthy and difficult to navigate*** – was highlighted as the most common challenge (52.1%). Respondents explained that it was difficult for potential tenants who are SDA eligible to apply for SDA and obtain an SDA approval, with SDA funding processes described as being complex, lengthy and inflexible. These difficulties were reported to also extend to support approvals. As a consequence, potential tenants face delays in getting SDA approved in their plans. Lengthy delays (as long as 10 months) for identified tenants to move into properties have meant properties are sitting empty.

In addition, respondents also highlighted delays for SDA providers in accessing SDA funds. For example, issues with accessing funds after plan reviews as well as issues with service bookings were reported to have left respondents with no income for 2 to 3 months.

The theme also included a lack of transparency and communication with the NDIS, particularly with SDA participants receiving limited information regarding their SDA decisions. A lack of linkage and cooperation among stakeholders and a lack of clarity around NDIA and SDA processes added to the sense of confusion, making it difficult to find SDA tenants.

“Process for tenants to get SDA in their packages is difficult.”

“Once [a] tenant is in the dwelling and they have a plan review getting the new funding approved and getting access to the funds through a new service booking taking 2 to 3 months with no money coming in.”

– SDA Providers

The second theme contributing to difficulties finding SDA tenants was an apparent **mismatch between supply and demand** (28.1%). Respondents emphasised that there seemed to be insufficient demand for SDA, leading to a lack of enquiries and difficulties finding tenants in the right locations. This was partly attributed to a lack of knowledge and awareness about SDA as well as uncertainty around potential tenants' SDA eligibility. For example, respondents reported that the lack of education for support coordinators about SDA meant that some NDIS participants were unaware of SDA housing or had been told it was too hard to apply for. Responses aligned to this theme also referred to the difficulty of matching tenants' needs with the design level of dwellings, compatibility between tenants, and the location of supply and demand. Some respondents reported that funding for prospective tenants to live in single resident apartments was often not approved, which led to lengthy legal appeals processes and providers being anxious about their investment in single resident dwellings in the pipeline.

“Tenancy matching. Had one apple upset the entire cart!”

“Locations where land is available & investors can afford to build aren't always where the tenants would like to live.”

“SDA developed for customers not yet registered for SDA, however their eligibility is often different to what was assumed.”

“Participants [are] unaware of SDA housing.”

– SDA Providers

The third theme identified was a ***lack of appropriate and consistent SDA funding*** (19.8%), which directly impacts supply and demand of SDA. Responses aligned to this theme referred to SDA approvals often being inconsistent with NDIS participants' goals, needs, and preferences. Respondents had also observed inconsistencies in SDA funding decisions across different NDIS participants. This was reported to lead to participants receiving incorrect funding levels or not being allocated any SDA funding in their plans. Respondents expressed feeling pressure to lease their SDA to participants with incorrect funding to fill their vacancies, despite this resulting in financial losses. This has reportedly led to a feeling of discouragement in the market.

“Tenants who have challenging behaviours who receive an IL [Improved Liveability] plan when it needs to be Robust. Time consuming as [the] plan has to be appealed by the SCs [Support Coordinators] as an IL plan is not practical for other housemates.”

“NDIS does not approve funding level consistent with tenant application.”

“NDIA expectation that SDA providers negotiate / drop SDA income expectation to fill vacancy, feasibility won't stack up. Discourages / dampens market.”

– SDA Providers

Challenges related to filling SDA vacancies

Challenging aspects of filling SDA vacancies were also explored in this survey (see Figure 14). The time taken by the NDIA to make decisions about SDA and decisions about support appeared to be the 2 most challenging aspects, which were seen as 'extremely challenging' by 77.8% and 66.7% of respondents respectively. In comparison, slightly fewer respondents reported these aspects as 'extremely challenging' in last year's *SDA Provider Experience Survey* (73.0% and 54.1% respectively).⁴⁷

Identified tenants having received an SDA determination that did not align with their housing preference, or the evidence provided, was rated by 63.0% of respondents as 'extremely challenging'. Almost two-thirds of respondents (61.5%) also reported that working with support teams to gather quality evidence for SDA determinations was 'somewhat challenging' or 'moderately challenging'.

Recent changes to 'Concierge' funding, getting home modifications and assistive technology (AT) in participant plans, and working with support providers to set up on-site overnight assistance (OOA) and associated funding were reported as not challenging by 38.5%, 34.6%, and 26.9%, respectively. These aspects appeared to have become slightly less challenging since last year's survey.⁴⁸

⁴⁷ Winkler et al. (2021). *Specialist Disability Accommodation provider experience survey*. Housing Hub and Summer Foundation.

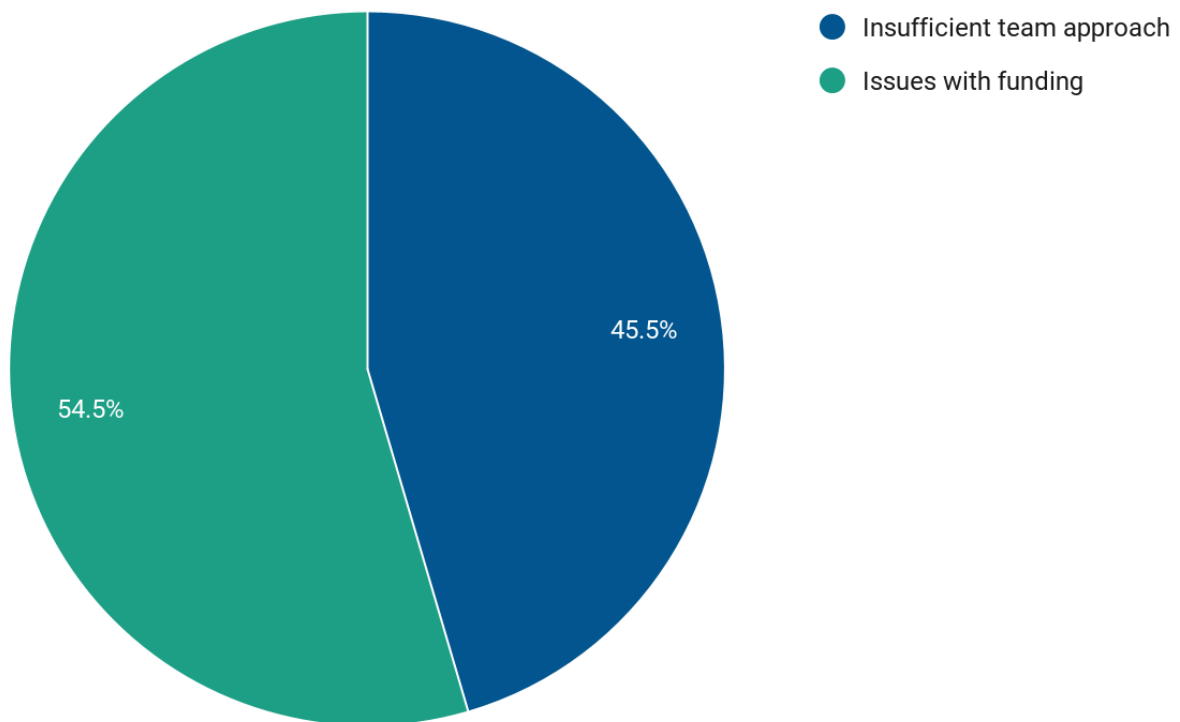
⁴⁸ Ibid.

Figure 14 – The extent of various challenges associated with filling SDA vacancies (n = 26-27)

| How challenging are the following aspects of filling vacancies in your SDA? | | | | | |
|--|-----------------|----------------------|----------------------|------------------------|-----------------------|
| | Not challenging | Slightly challenging | Somewhat challenging | Moderately challenging | Extremely challenging |
| Time NDIA takes to make SDA decisions | 0.0% | 3.7% | 0.0% | 18.5% | 77.8% |
| Time NDIA takes to make support decisions | 0.0% | 7.4% | 0.0% | 25.9% | 66.7% |
| Time NDIA takes to make decisions about funding for assistive technology | 14.8% | 11.1% | 14.8% | 25.9% | 33.3% |
| Logistics associated with tenants moving in | 11.1% | 33.3% | 14.8% | 29.6% | 11.1% |
| Recent changes to 'Concierge' funding | 38.5% | 11.5% | 19.2% | 11.5% | 19.2% |
| Working with support teams to gather quality evidence for SDA determinations | 7.7% | 19.2% | 26.9% | 34.6% | 11.5% |
| Identified tenants have received an SDA determination that is not aligned to their housing preference or the evidence provided | 3.7% | 7.4% | 14.8% | 11.1% | 63.0% |
| Working with SIL providers to set up OOA and associated funding | 26.9% | 19.2% | 19.2% | 19.2% | 15.4% |
| Getting home modifications and assistive technology (AT) in their plans | 34.6% | 7.7% | 15.4% | 23.1% | 19.2% |

Respondents were also given the opportunity to identify additional challenging aspects to filling vacancies in an open-ended question. A thematic analysis identified 2 overarching themes. The most commonly identified theme was 'issues with funding' (54.5%), followed by 'insufficient team approach' (45.5%; see Figure 15).

Figure 15 – Themes identified from reported barriers to filling vacancies (percentage of responders whose response aligned with an identified theme)



The first identified theme related to **issues with funding** (54.5%). Aligned responses referred to insufficient funding amounts to cover costs and fill vacancies, as well as having to adjust to ongoing changes to funding models. Providers reported feeling like they have no recourse when NDIS funding changes, leaving them with losses. This theme also included reports of SDA service agreements being cancelled after an SDA plan is updated, requiring SDA providers to spend unnecessary time on re-establishing a quote and agreement.

“SDA providers are not really in a position to do anything but take the losses.”

– SDA Provider

The second theme relating to the challenges of filling vacancies was an **insufficient team approach** (45.5%). This mainly referred to the need for various stakeholders, such as high-quality support coordinators and support providers, to work collaboratively, which was reported as not sufficiently recognised by NDIA processes. Respondents also reflected on the challenges associated with high staff turnover among support providers and the resulting shortage of support staff.

“Having good Support Coordinators to assist in Plan Reviews and day to day support issues [is] extremely challenging.”

“As noted earlier the team of people involved in making housing decisions is not recognised by the NDIA and how a truly long term good housing outcome is determined. It requires a highly qualified team and process to provide the right housing choices.”

– SDA Providers

Support providers

Eleven out of twenty-seven respondents (40.7%) reported that they have SDA dwellings that are no longer sustainable for support providers to continue to provide tenants' support due to prolonged vacancies. A total of 28 dwellings were reported to be unsustainable.

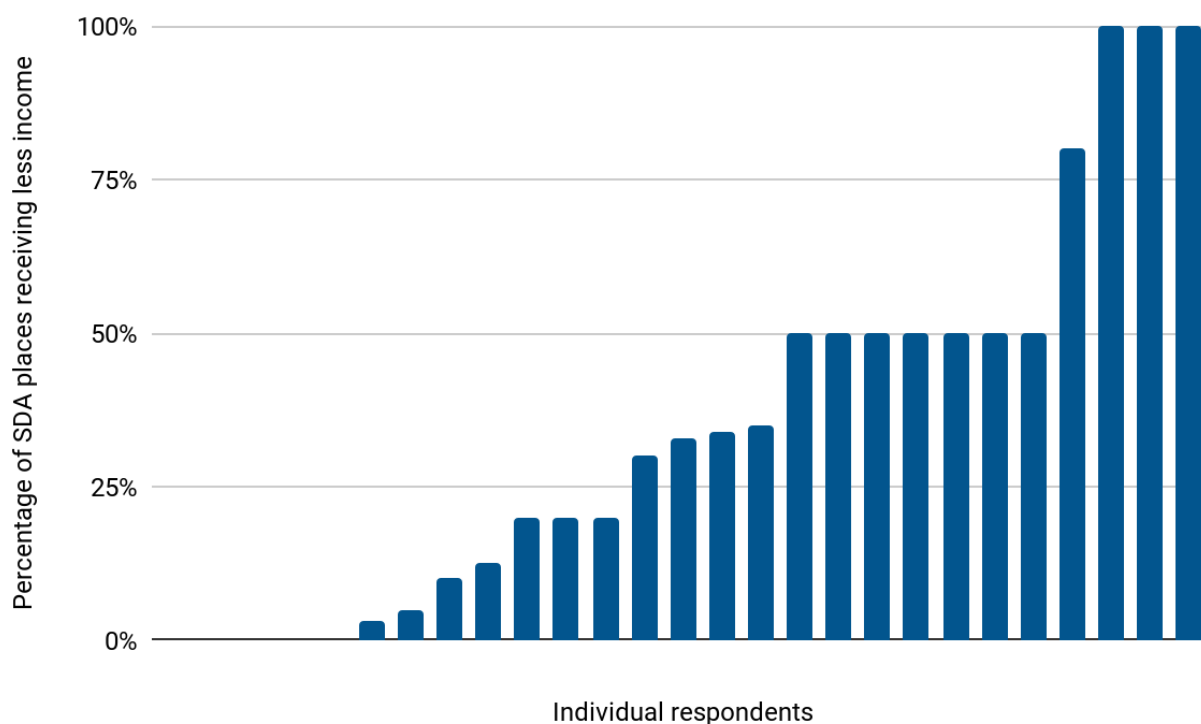
Financial risks

The survey asked respondents to reflect on financial risks in the market, including the SDA income they receive and overdue payments by the NDIA. These questions were answered by almost all respondents (n = 27).

SDA income

Respondents were asked to indicate the percentage of their SDA places that are receiving less than the anticipated income (that is, they received a lower rate of SDA payments than the dwelling was enrolled for). Most respondents (81.5%) indicated they are receiving less than the anticipated income for at least some of their SDA (compared to 83.8% in last year's *SDA Provider Experience Survey*).⁴⁹ Only 5 respondents (18.5%) reported that none of their SDA places received less than anticipated income. However, the percentage of SDA places receiving less than anticipated income varied strongly between respondents – see Figure 16 for a breakdown of the percentages reported by each respondent. As can be seen, 1 provider reported 3%, 7 providers reported 50% and 3 providers reported 100% of their SDA places received less than the anticipated income. Across all respondents, the median percentage of SDA places receiving less than the anticipated income was 33%.

Figure 16 – Percentages of SDA places receiving less than anticipated income. Each bar represents the percentage of SDA places reported by 1 respondent (n = 27).

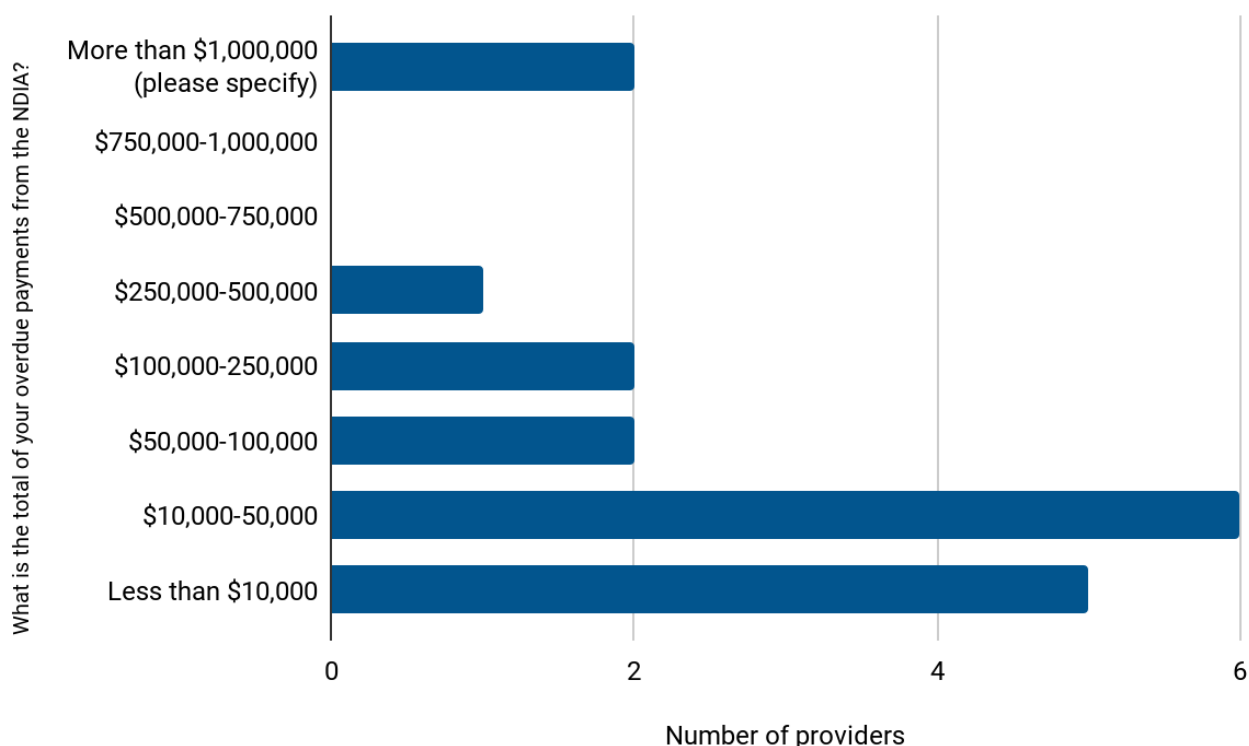


⁴⁹ Winkler et al. (2021). *Specialist Disability Accommodation provider experience survey*. Housing Hub and Summer Foundation.

Overdue payments from the NDIA

The majority of respondents (70.4%, n = 19) reported that the NDIA owes them SDA payments for NDIS participants living in their properties. Eighteen respondents indicated the total of these overdue payments (see Figure 17). The most common amount was \$10,000-\$50,000, which was reported by one-third of respondents (33.3%). This was followed by more than a quarter of respondents (27.8%) who were each owed less than \$10,000. No respondents reported being owed more than \$500,000, with the exception of 2 providers (11.1%) who were owed more than \$1,000,000 (\$1.1 and \$1.3 million each).

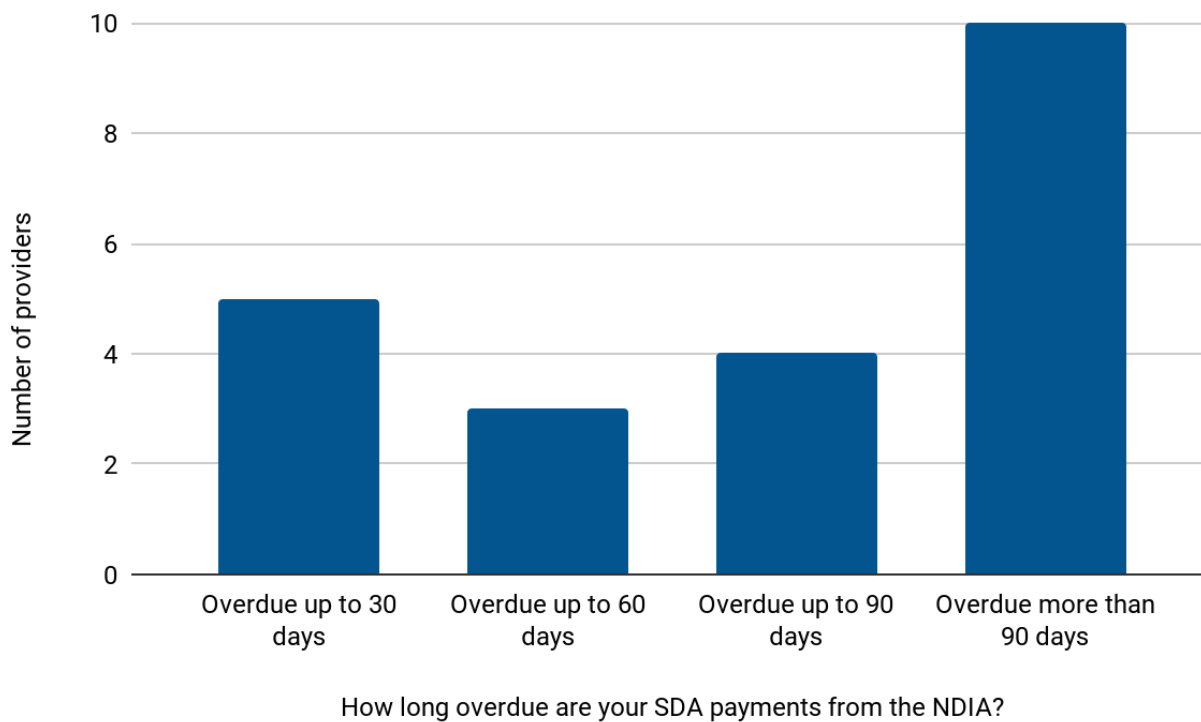
Figure 17 – Number of respondents indicating the total amount of overdue payments from the NDIA (n = 18).



Of the respondents that indicated they were owed SDA payments from the NDIA, more than half (52.6%) reported that these payments were overdue by more than 90 days (see Figure 18). Of these, 9 respondents disclosed the amount they were owed by the NDIA. This revealed that the total amount overdue by more than 90 days was in excess of \$2 million (\$2,162,289). This is somewhat lower than the amount of money that was reported as overdue by more than 90 days in last year's *SDA Provider Experience Survey* (\$3.7 million across 9 respondents).⁵⁰

⁵⁰ Winkler et al. (2021). *Specialist Disability Accommodation provider experience survey*. Housing Hub and Summer Foundation.

Figure 18 – Number of respondents indicating the length of their overdue SDA payments from the NDIA (n = 18). *Note: Respondents were able to select multiple options.*



Of the respondents who reported being owed money by the NDIA, 18 respondents indicated possible reasons for these overdue SDA payments. On average, 84.7% of the overdue payments were believed to be caused by slow administration by the NDIA (for example, the NDIA processing applications and requests slowly). All respondents indicated that this slow administration accounted for at least 50% of their overdue payments, which represents an increase since the 2021 *SDA Provider Experience Survey*.⁵¹ In addition, 33.3% of overdue payments were believed to be caused by administrative errors by the NDIA (for example, the NDIA not paying the correct rate), with a third of respondents indicating that at least 50% of their overdue payments were due to this reason.

Changes in overdue payments by the NDIA between 2021 and 2022

Six respondents have reported the amount of overdue payments by the NDIA in both the 2021 and 2022 *SDA Provider Experience Survey*. For these respondents, changes in the amount they were owed could be investigated. As can be seen in Figure 19, the majority of respondents (66.7%) did not experience any change in the amount of money they were owed by the NDIA. Most of these respondents were owed significant amounts by the NDIA in both 2021 and 2022 (see Figure 20), with one respondent being owed more than \$1 million in both years (noting that this provider has a large number of SDA properties). One respondent (16.7%) experienced an increase in overdue payments from ‘\$500,000-\$750,000’ to ‘more than \$1 million’. One respondent (16.7%) reported a reduction in the amount owed by the NDIA.

⁵¹ Winkler et al. (2021). *Specialist Disability Accommodation provider experience survey*. Housing Hub and Summer Foundation.

Figure 19 – Percentage of respondents with no change, an increase, and decrease in the amount of money they were owed between 2021 and 2022 (n = 6)

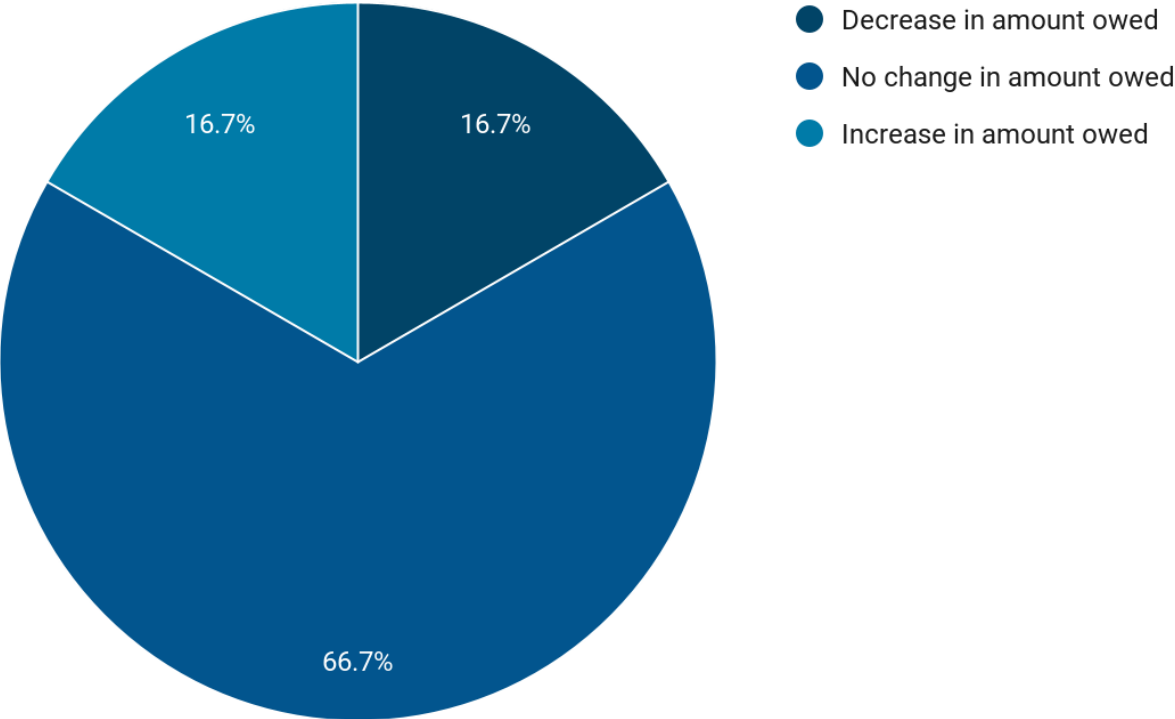
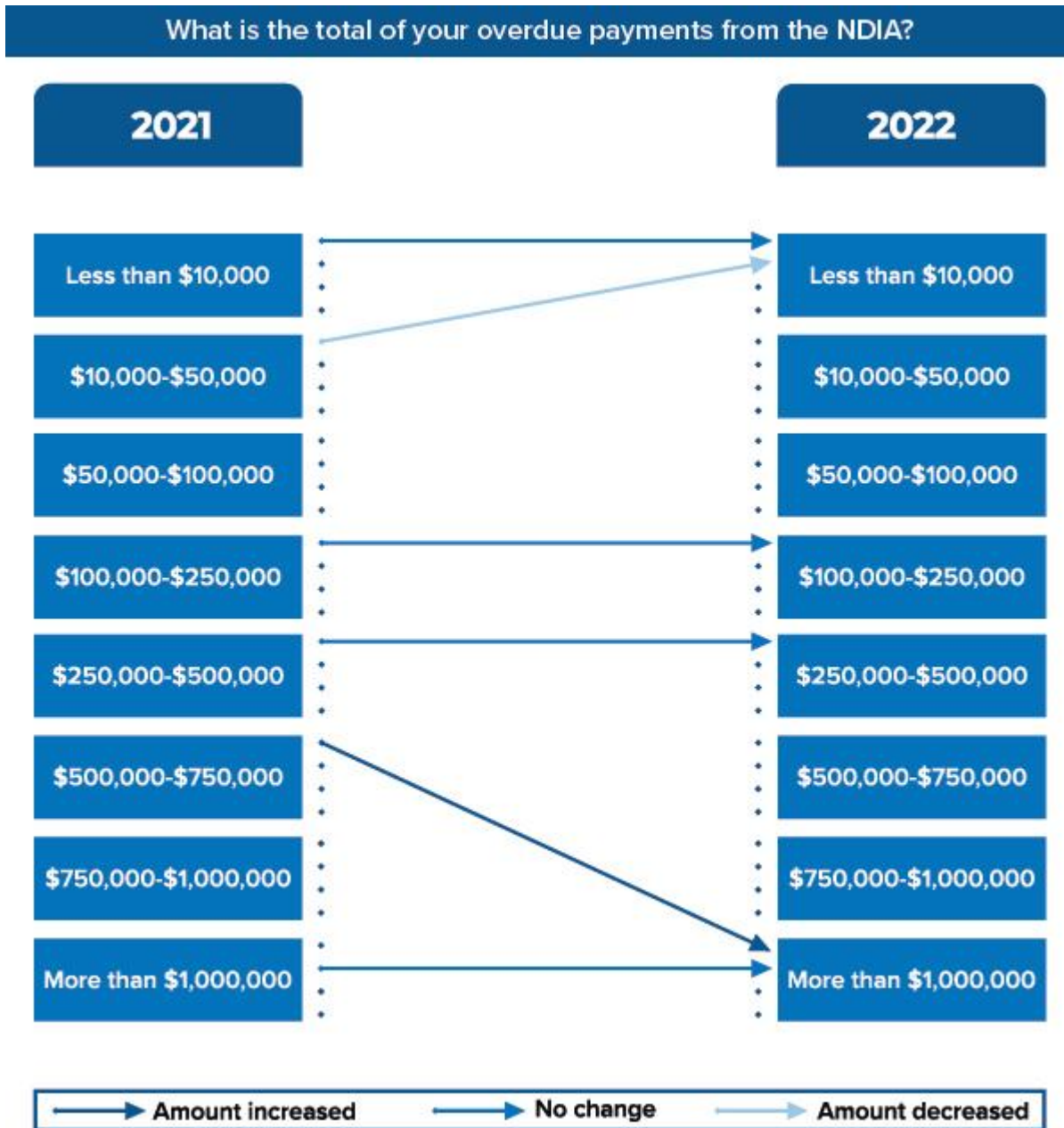


Figure 20 – Individual changes in the amount of payments each respondent was owed by the NDIA between 2021 and 2022. Each line represents the change experienced by one respondent (n = 6).



Challenges once tenants have moved in

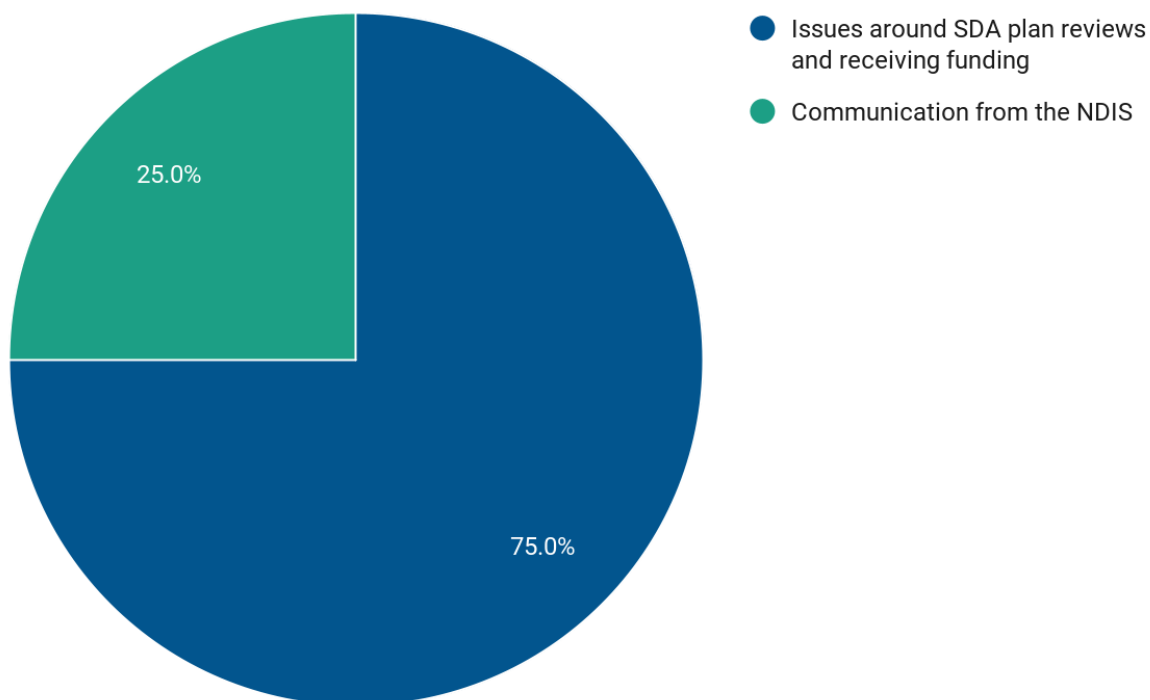
Respondents were asked about a range of challenges experienced once tenants have moved into their SDA properties (see Figure 21). Most frequently reported as 'extremely challenging' issues were NDIS plans expiring (52.0%), securing the payment of SDA funds (48.0%), issues with service bookings (36.0%) and changes in tenants' circumstances, including NDIS plan reviews (32.0%). Over two-thirds of respondents indicated that issues related to the tenancy (68.0%) were 'slightly challenging' or 'somewhat challenging'. Almost half of respondents indicated that issues with the OOA provider (48.0%) were 'not challenging', making this the least challenging aspect.

Figure 21 – Extent of various challenges once tenants have moved in (n = 25)

| How challenging are the different aspects of business once tenants have moved in? | | | | | |
|---|-----------------|----------------------|----------------------|------------------------|-----------------------|
| | Not challenging | Slightly challenging | Somewhat challenging | Moderately challenging | Extremely challenging |
| Securing the payment of SDA funds by the NDIA | 12.0% | 4.0% | 24.0% | 12.0% | 48.0% |
| NDIS plans expiring | 0.0% | 8.0% | 16.0% | 24.0% | 52.0% |
| Issues with service bookings | 12.0% | 8.0% | 16.0% | 28.0% | 36.0% |
| Issues within the tenancy that you need to get involved in | 16.0% | 36.0% | 32.0% | 8.0% | 8.0% |
| Issues with the on-site overnight assistance (OOA) provider | 48.0% | 24.0% | 8.0% | 12.0% | 8.0% |
| Changes in tenants' circumstances, including NDIS plan reviews | 16.0% | 4.0% | 24.0% | 24.0% | 32.0% |

In an open-ended question, respondents were given the opportunity to identify additional challenging aspects after tenants have moved into SDA housing. A thematic analysis identified 2 overarching themes. These were 'issues around SDA plan reviews and receiving funding' and 'communication from the NDIS'. Two-thirds of respondents (75.0%) identified issues around SDA plan reviews and receiving funding as being a challenge (see Figure 22).

Figure 22 – Themes identified from reported challenging aspects after tenants have moved into SDA housing (percentage of responders whose response aligned with an identified theme)



The first identified theme was **issues around SDA plan reviews and receiving funding** (75.0%). This mainly referred to plan reviews being slow or SDA funding not being renewed after a plan review, which can lead to delays for providers in being able to access SDA funds and create new SDA service agreements. Respondents also reported that they had experienced significant delays in receiving SDA funding due to administrative errors. Frustration with the NDIA was also voiced, with 1 respondent urging the NDIA to deliver on the promise by the government that no one would be worse off under the NDIS than under the previous funding schemes offered by states and territories.

“The main thing is participants having their plans reviewed and the NDIA not renewing the SDA - why does their data system not link the SIL to the SDA where it exists?”

“NDIA owed us money for over 12 months (approx. 10% of the annual rent). There was no dispute just slow to grasp the issue which was an agency stuff up.”

– SDA Providers

The second theme was **communication of key information from the NDIS** (25.0%). This mainly referred to the need for SDA providers to have more information on NDIS statistics and SDA eligibility. It was also suggested that the NDIA review and release price reviews earlier.

“Understanding and release of information from NDIS on numbers and details of SDA eligibilities.”

– SDA Provider

Changes to the SDA market

Respondents were asked to propose one change they would like to make to the SDA market. The proposed changes were grouped thematically. They are presented in Figure 23 and include:

Activating SDA demand and increasing certainty for SDA investment decisions (37.5%).

It was suggested the NDIA increase the number of NDIS participants with active SDA funding in their plans to move closer to the estimated 30,000 people eligible for SDA in order to match the supply being created in the market. This also included improving and clarifying the eligibility criteria for single resident dwellings. Once SDA funding is activated in a participant's plan, the funding should be automatically rolled-over following plan reviews and increased following price reviews to ensure SDA providers continue to receive the appropriate payment.

“Why would you build more when the supply of funded participants is so weak?”

– SDA Provider

Clarifying and reducing the timeframe of SDA approval processes (33.3%). Respondents stated that they wanted the NDIA to commit to a clear timeframe for processing SDA and support applications. This timeframe should be shorter than current processing times, with respondents suggesting a turnaround of 7-10 days.

“Service delivery standard of 10 days for all SDA and SIL decision making.”

– SDA Provider

Increasing transparency and choice in SDA processes (16.7%). It was recommended that the NDIA be more transparent in its SDA assessments and approval decisions. This included providing an explanation of the decisions made and basing assessments on the evidence provided. It was also highlighted that housing and support should be separated and that participants should be allowed to choose where and with whom they would like to live. This is in line with the *SDA Operational Guidelines*, which specify that NDIS participants should be able to choose separate providers for their SDA property and support services.⁵²

“Process for approvals to be improved & explanation of decisions made provided.”

– SDA Provider

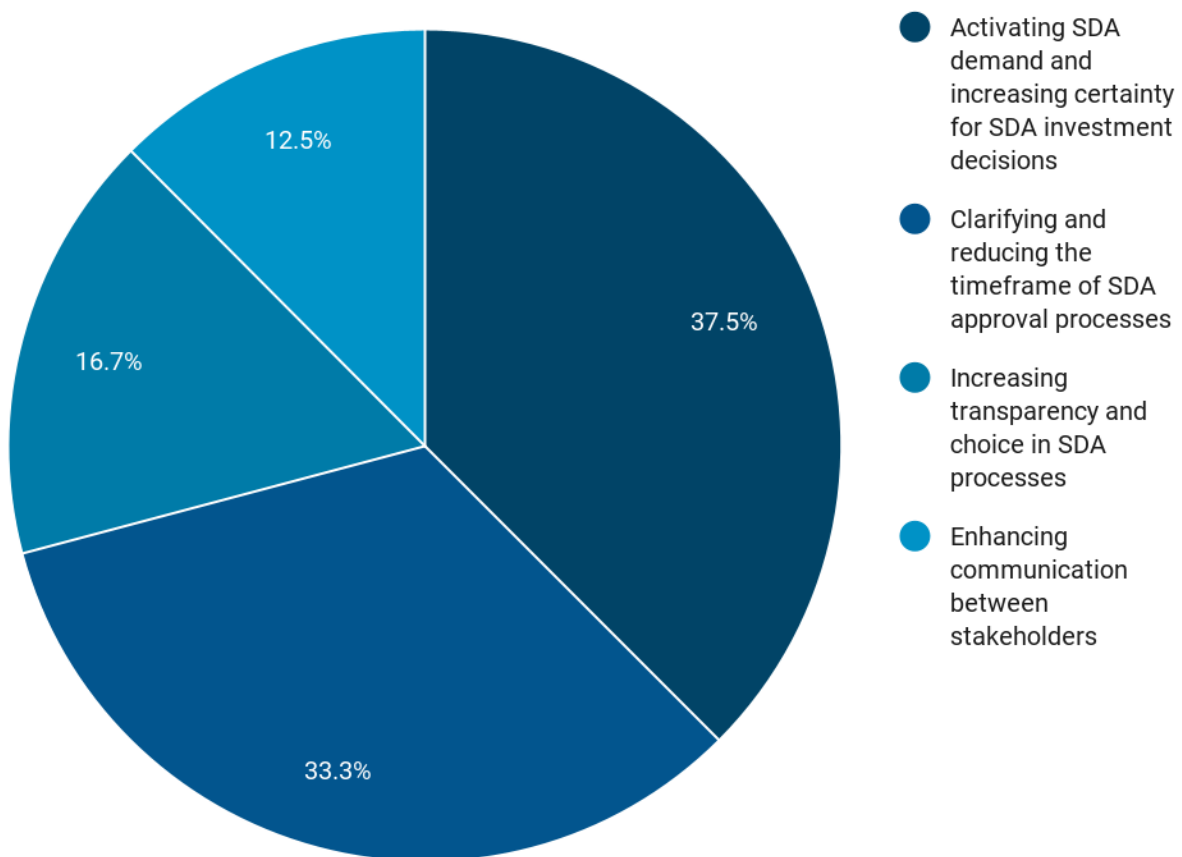
Enhancing communication between stakeholders (12.5%). Direct communication with the NDIA could be improved by giving SDA providers access to a dedicated staff member to resolve issues as they occur. This staff member should be sufficiently trained in the rules and regulations relating to SDA. It was also suggested that the NDIA develop a digital interface allowing relevant stakeholders with consent to track a participant's SDA application status.

“Create a ‘participant journey’ with a digital interface that relevant stakeholders with consent can access (e.g., Participant, Support Coordinators, SIL Providers, SDA Providers can view status and understand where a person is at).”

– SDA Provider

⁵² NDIA (2021). *Specialist Disability Accommodation: Operational Guideline*. National Disability Insurance Agency, p.18

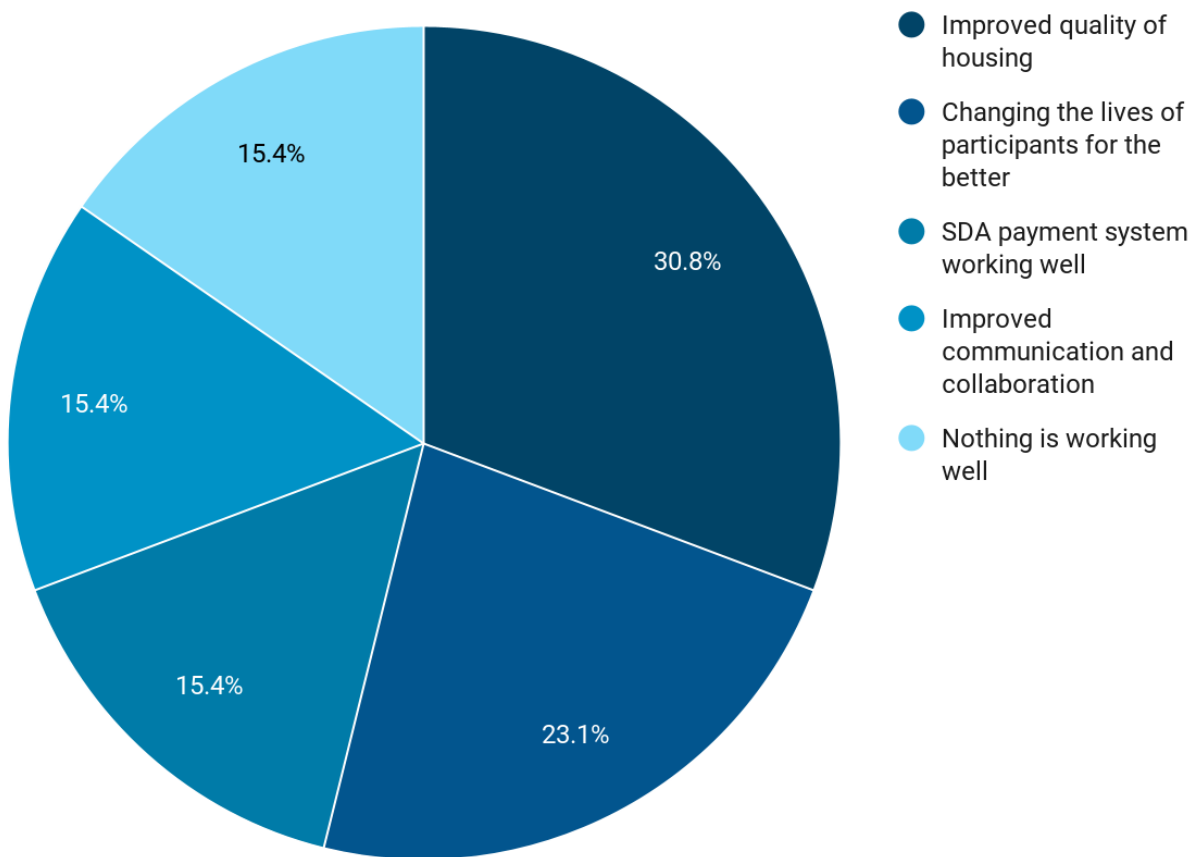
Figure 23 – Themes identified from reported changes to the SDA market (percentage of responders whose response aligned with an identified theme)



Current strengths of the SDA market

Finally, respondents were asked to indicate aspects of the SDA market that were working well (see Figure 24). Responses were analysed thematically, resulting in 5 overarching themes. While some respondents expressed that ‘nothing is working well’, other themes included ‘improved quality of housing’, ‘SDA payment system working well’, ‘improved communication and collaboration’ and ‘changing the lives of participants for the better’.

Figure 24 – Themes identified from reported aspects of the SDA market that are currently working well (percentage of responders whose response aligned with an identified theme)



The first theme was **improved quality of housing** (30.8%). This referred mainly to improvements in the construction of new properties, and that housing is now better able to meet participant needs. This was partly attributed to increasing opportunities for innovation and collaboration, as well as more clarity around building requirements.

“The market is continuing to mature, with opportunities for innovation and collaboration between residents, guardians and families, SDA providers and SIL’s.”

– **SDA Provider**

The second theme was **changing the lives of participants for the better** (23.1%). This referred to the sense of satisfaction experienced by providers that they are positively impacting the lives of participants and helping them to achieve their goals.

“We are getting young people out of aged care which is satisfying.”

– **SDA Provider**

The third theme was that the **SDA payment system is working well** (15.4%). This referred mainly to improvements in the system such that, once NDIS payments are locked in, the automatic payments are running smoothly.

“Payment claims process works well once everything is in place.”

– SDA Provider

The fourth theme was that there is **improved communication and collaboration** between different stakeholders (15.4%). Respondents also valued receiving high-quality support from some NDIA officers, particularly in the SDA enrolment team.

“SDA enrollment team is responsive, and dwelling enrollment is efficient.”

– SDA Provider

The fifth theme was that **nothing is working well** (15.4%). Some respondents referred to the frustration around NDIS processes being difficult for families to understand, and that the reclassification of properties when transitioning to NDIS has been misleading.

“Not much! However slowly families are now working their way through understanding what SDA can do for their loved one.”

– SDA Provider

Discussion

This report presents findings from the second iteration of the *SDA Provider Experience Survey*. Like the first iteration of the survey, the report aimed to understand the experiences of SDA providers, including: (1) challenges related to vacancies and leasing SDA, (2) financial risks, including securing the timely payment of SDA funds by the NDIA, and (3) navigating the NDIA's SDA processes once tenants have moved in. Respondents were also given the opportunity to suggest changes to the SDA market and indicate what is working well in the market.

A total of 28 SDA providers shared their experiences in this survey. Together, these providers have enrolled 671 New Build SDA dwellings, and so supply over a quarter of all New Build SDA in Australia. In total, the respondents have invested over \$1.5 billion in capital to build new SDA, accounting for nearly half of the total value of the SDA market.⁵³ As such, the findings of this survey reflect the experiences of SDA providers with a significant market share. It is therefore important for the NDIA to consider and act on the concerns and suggestions revealed in this report.

One key concern raised by the respondents relates to vacancy risks in New Build SDA. Almost a quarter (22.1%) of the enrolled new SDA places reported in this survey were vacant. Most respondents in this survey supplied SDA dwellings for 1-3 residents, for which the NDIA's *Pricing Arrangements* assume a vacancy rate of 3-7%.⁵⁴ This suggests that vacancy rates in the SDA market are substantially higher than what is estimated and built into the Pricing Arrangements. SDA dwellings also appear to be standing vacant for a significant amount of time. Respondents reported it often took more than 3 months to fill a single vacancy and more than 6 months to lease a new group of dwellings in full, and these timeframes appear to have increased since last year. These findings are consistent with previous research, which has long identified vacancies as a key challenge in the SDA market.⁵⁵ When compared to the current state of the mainstream rental market, the difference is stark.⁵⁶ The ongoing – and potentially escalating – nature of this issue may dampen investors' confidence and providers' willingness to operate in the market. It is critical that the reasons for these vacancies are identified, acknowledged and addressed to ensure the market remains a viable option for providers and investors.

Delayed decision-making by the NDIA's Home and Living Panel for SDA funding and associated supports appear to be a contributing factor to prolonged vacancies. Findings of this survey indicate that the amount of time the NDIA takes to make SDA and support decisions was extremely challenging for at least two-thirds of respondents, making this one of the most challenging aspects of filling SDA vacancies. Indeed, the latest *NDIS Quarterly Report* reveals that out of nearly 5,000 applications completed by the Home and Living Panel in the 3 months to March 2022, 45% were completed in over 60 days, and only 4% in under 14 days.⁵⁷ Research also indicates that for some

⁵³ Calculated based on the number of enrolled SDA (excluding "in-kind" arrangements with state governments) multiplied by an approximate cost per dwelling: 6,858 dwellings * \$500,000 per dwelling = \$3.43 billion.

⁵⁴ NDIA (2021). *NDIS pricing arrangements for Specialist Disability Accommodation 2021-22*. National Disability Insurance Agency. <https://www.ndis.gov.au/providers/housing-and-living-supports-and-services/specialist-disability-accommodation/sda-pricing-and-payments>

⁵⁵ Winkler et al. (2021). *Specialist Disability Accommodation provider experience survey*. Housing Hub and Summer Foundation; Winkler, D., McLeod, J., Mulherin, P., Rathbone, A. and Ryan, M. (2020). *Specialist Disability Accommodation (SDA) explainer for investors*. Summer Foundation and JBWere. <http://summerfoundation.org.au/wp-content/uploads/2020/12/SDA-Explainer-for-investors-web.pdf>

⁵⁶ Burke (2022). *Australia faces national rental crisis as vacancy rate falls again*. Sydney Morning Herald. <https://www.smh.com.au/property/news/australia-faces-national-rental-crisis-as-vacancy-rate-falls-again-20220404-p5aap4.html>

⁵⁷ NDIA (2022). *NDIS quarterly report to disability ministers: Q3 2021-2022*. National Disability Insurance Agency, p. 64.

participants, the NDIA takes approximately 3 months to make an initial SDA funding decision.⁵⁸ This may explain why it often took respondents in this survey at least 3 months to fill a single vacancy. Unsurprisingly, respondents recommended that the NDIA reduce decision-making timeframes for SDA and support applications, with some respondents suggesting a turnaround of 7-10 days. This is consistent with current advocacy movements in the market, with close to 140 leading disability, health and housing organisations calling upon the NDIA to process housing and support approvals within 10 days.⁵⁹ Urgent reaction to these calls is needed to ensure that providers can fill their vacancies and NDIS participants who are eligible for SDA can swiftly move into appropriate housing.

Another factor contributing to vacancies is the insufficient activated demand for SDA. Consistent with the findings from the 2021 *SDA Provider Experience Survey*, respondents again expressed concern that not enough NDIS participants have SDA in their plans.⁶⁰ This is demonstrated by the fact that only 17,693 out of the estimated 30,000 eligible NDIS participants have SDA funding approved in their plans as of March 2022.⁶¹

Even when NDIS participants receive funding approvals, the funding often does not align with their needs and preferences or what is being supplied in the SDA market. For example, almost two-thirds of respondents indicated that it was extremely challenging to find tenants with the right SDA level in their plans, and that it was extremely challenging to fill vacancies when identified tenants receive a determination that is inconsistent with their preferences or the evidence provided. A lack of approvals for single resident dwellings was reported, which is particularly noteworthy as single resident dwellings are the most common build types in the SDA pipeline across Australia⁶² and were commonly provided by the respondents in this survey. These findings are again consistent with previous research.⁶³ Due to inconsistent SDA funding decisions, NDIS participants often need to pursue lengthy appeals processes,⁶⁴ which further prolongs an already slow decision-making process. Providers may also feel forced to take losses (that is, leasing an SDA dwelling at a lower rate) as they cannot afford to wait to find another tenant. Providers who are consequently anxious about their investment decisions in the market may withdraw from building further SDA dwellings.

Activating the demand side of the SDA market and ensuring consistency in approvals, including enhancing the transparency and communication of funding decisions, are important steps towards increasing provider certainty for SDA investments.

Once vacancies have been filled, financial risks are an ongoing challenge SDA providers face when operating in the SDA market. The majority of respondents indicated they were receiving less than anticipated income for at least some of their SDA, which typically affected one-third of their SDA places. Over 70% of respondents also reported they were owed SDA payments by the NDIA, with more than half reporting they had payments that were overdue by more than 90 days.

⁵⁸ Skipsey et al. (2022). *Housing delayed and denied: NDIA decision-making on Specialist Disability Accommodation*. Public Interest Advocacy Centre and Housing Hub.

⁵⁹ Downto10days Campaign (2022). Available at: <https://www.downto10days.org.au/our-mission>

⁶⁰ Winkler et al. (2021). *Specialist Disability Accommodation provider experience survey*. Housing Hub and Summer Foundation.

⁶¹ NDIA (2022). *NDIS quarterly report to disability ministers: Q3 2021-2022*. National Disability Insurance Agency; Commonwealth of Australia (2021). *Senate Community Affairs Legislation Committee: Answers to questions on notice*. Social Services Portfolio. NDIA SQ21-000118. <https://www.aph.gov.au/api/qon/downloadattachment?attachmentId=be23f5a1-fbba-41f9-a389-e3cb9737563a>

⁶² Aimers et al. (2021). *Specialist Disability Accommodation – Supply in Australia: November 2021*. Housing Hub and Summer Foundation.

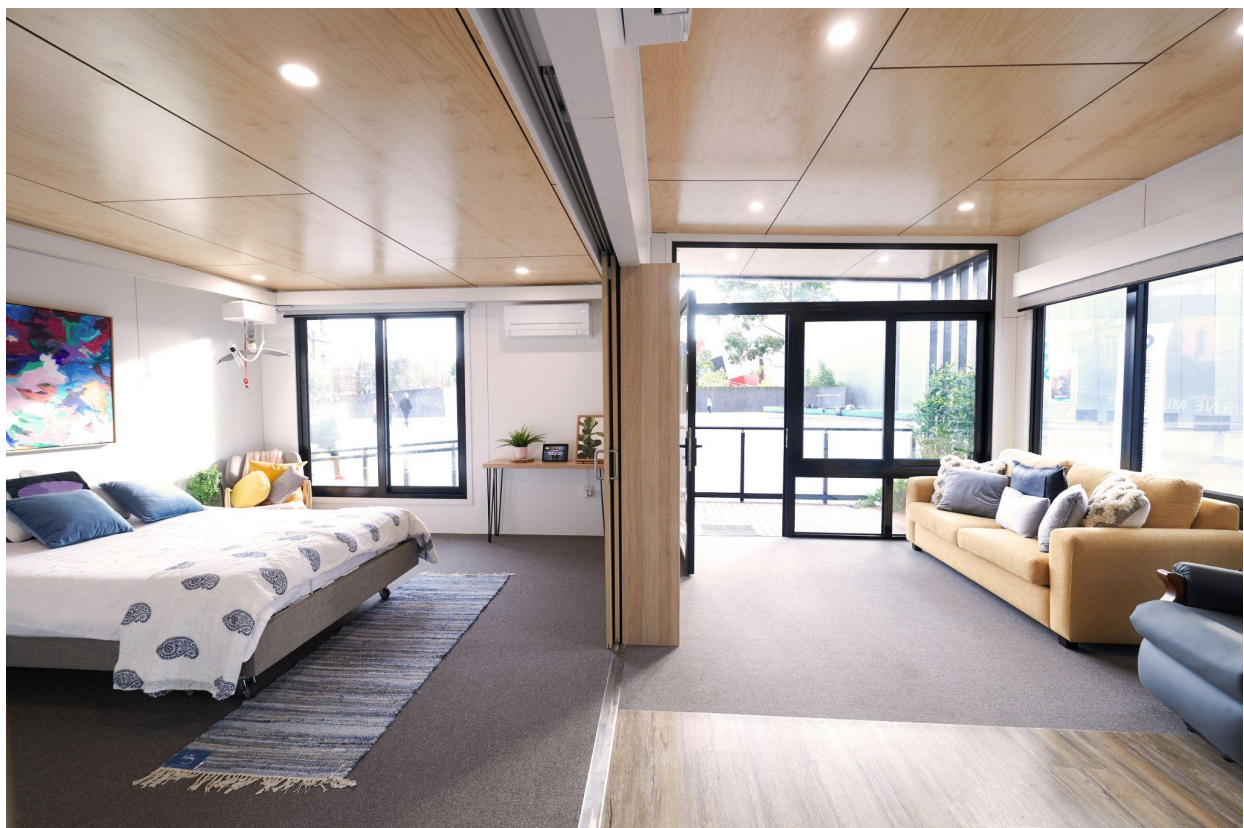
⁶³ Aimers et al. (2022). *CHPs and disability housing: An exploration of SDA*. Housing Hub and Summer Foundation; Winkler et al. (2021). *Specialist Disability Accommodation provider experience survey*. Housing Hub and Summer Foundation.

⁶⁴ Skipsey et al. (2022). *Housing delayed and denied: NDIA decision-making on Specialist Disability Accommodation*. Public Interest Advocacy Centre and Housing Hub.

Concerningly, most respondents who participated in the *SDA Provider Experience Survey* in 2021 and 2022 were owed the same amount of money in both years. This indicates that SDA providers are facing ongoing financial risks and highlights the need for the NDIA to address systemic issues that are contributing to overdue payments. Respondents in this survey reported that most of their overdue payments could be attributed to slow processing by the NDIA. Issues with service bookings, plan reviews and NDIS plans expiring were also highlighted as extremely challenging aspects once tenants have moved in and may be contributing to the difficulties securing SDA funds. The NDIA's systems for managing these ongoing administrative tasks need to be reliable and efficient, to reduce processing times and prevent further payment errors.

The SDA market holds the potential to improve the lives of tens of thousands of people with disability in Australia. Indeed, despite the current challenges in the market, respondents felt a sense of satisfaction operating in the SDA market, as it provides an opportunity to improve people's lives. Respondents also highlighted positive aspects and achievements in the market, including improvements in the quality of SDA dwellings and cooperation between stakeholders. While these are positive developments, the survey highlighted ongoing commercial challenges for SDA providers, with 15% of respondents stating that nothing was working well in the SDA market.

It is important for the NDIA to continue to steward the SDA market and address the commercial concerns identified in this survey to prevent further discouragement in the market. Addressing the identified concerns will help ensure that the market can fulfil its potential and remains a viable, long-term housing solution for people with disability. Specific recommendations for the NDIA to consider and implement are summarised below.



Recommendations

1. **Improve clarity on the demand side of the SDA market** – Providers and investors need more transparency on current and anticipated demand for SDA. To this end, the NDIA should provide more detailed information on demand profiles, such as publishing the required building type and design category alongside desired location for participants currently seeking SDA. This also includes the NDIA investigating and releasing expectations of future demand, such as the needs and preferences of the remaining 12,000 NDIS participants expected to be eligible for SDA.
2. **Use the available supply of SDA** – NDIS participants need to be approved for funding to move into the hundreds of vacant SDA properties currently on the market. To increase the number of NDIS participants who have SDA funding in their plans, the NDIA needs to raise awareness of SDA, build the capacity of NDIS participants to apply for SDA funding, make SDA funding decisions that align with participants' needs and preferences, and approve SDA funding requests faster and more accurately.
3. **Enhance the quality of SDA funding decisions** – SDA approvals should align with participants' needs and preferences to prevent lengthy appeals and prolonged vacancies.
4. **Enhance the transparency of SDA funding decisions** – The Home and Living Panel should provide explanations for funding decisions made, as well as clear criteria around the eligibility for different funding types and the evidence required.
5. **Improve communication of SDA funding requests and approval processes** – Providers should have access to officers in the NDIA that act as a point of contact for an NDIS participants' SDA application. Whilst maintaining the privacy of the NDIS participant, providers could work with this contact person to help progress SDA applications and resolve any issues as they emerge.
6. **Reduce decision-making times for housing and support funding** – The Home and Living Panel should commit to clear timeframes for making funding decisions, including a target of 10 days for requests from priority cohorts, such as participants in hospital, or participants in a high risk situation in residential aged care. It should track and regularly publish data on the time taken to make these decisions – from the date the SDA request is made to when it is communicated to the participant.
7. **Clarify the process of requesting housing and support funding** – The Home and Living Panel should publish the steps in the process of requesting funding, from the participant's perspective.
8. **Ensure SDA payments are accurate and paid on time** – SDA providers should receive the correct amount of payments in a timely manner to help reduce financial risks. This could partly be achieved by the NDIA enhancing the efficiency and reducing the processing times for ongoing administrative tasks, such as plan reviews and service bookings.
9. **Release vacancy data** – To alleviate investor and provider concerns about escalating vacancy rates, the NDIA should release detailed vacancy data in *SDA Quarterly Reports*. This should include breakdowns by building type, design categories, occupancy, and location. NDIA observations on vacancy trends and expectations of future vacancies should be provided to help inform supply and increase market stability.

Appendix A: SDA design categories and building types

To enrol an SDA property with the NDIA, SDA providers submit information on the design category, building type, number of bedrooms, and location of the dwelling.⁶⁵ New Build SDA dwellings are enrolled with the NDIA in 1 of 4 design categories. Older SDA properties that do not have any special design features have previously been enrolled as 'Basic', but this category is not available for New Build SDA. Design categories for New Build SDA are:

Improved Liveability – For tenants who find it difficult to see or understand things around them. Improved Liveability SDA is easy to move around in. Doorways, handles and switches are easy to see and it's often easy to see from one room through to the next.

Fully Accessible – For tenants with significant physical disability. Most often, people who are eligible for Fully Accessible SDA use a wheelchair to get around some or all of the time. There are no steps in a Fully Accessible home. Doorways are wide enough for a wheelchair. The bathroom is designed to be used by people who are sitting as well as standing and the kitchen often is too.

High Physical Support – For tenants who most often use an electric wheelchair to get around and/or a hoist to get in and out of bed and who need many hours of support every day. A High Physical Support home has all the features of Fully Accessible SDA, plus emergency back-up power and a ceiling that is strong enough for a ceiling hoist. It will often have an intercom that connects the tenant to a support worker who is close by. It may also have assistive technology that suits the needs of the tenant – this could include doors, lights and heating that can be controlled by voice or with a device.

Robust – For tenants who sometimes act in a way that may not be safe for them or the people around them. The walls, windows and other fittings in a Robust home aren't easily broken. Robust homes have good sound-proofing, so that sounds from outside do not impact the tenants and so that any noise the tenants make does not impact adjoining properties. The doors and windows are secure. A Robust home will also have a space where tenants or staff can go to keep safe.

In addition to their design category, SDA must be enrolled as one of the following building types:

Apartments – self-contained units that are part of a larger building complex.

Duplexes, Villas, Townhouses – semi-attached properties within a single land title.

Houses – detached low rise dwellings with gardens or courtyards.

Group Homes – houses that are home for up to 5 NDIS participants.

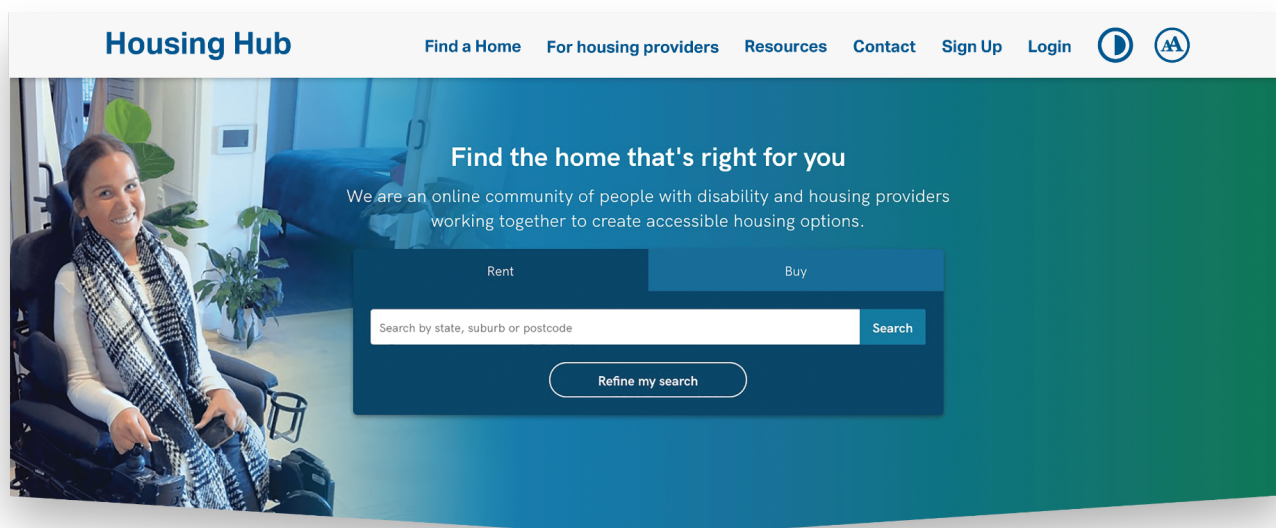
Larger Dwellings – properties that house more than 5 long-term NDIS participants. This is also called 'Legacy SDA'. Larger dwellings are only for participants who already lived in this type of dwelling before their first NDIS plan. SDA payments for Legacy stock cease 5-10 years after enrolment with the NDIA, meaning that a large number of Legacy dwellings will exit the scheme or be renovated or refurbished to enrol as New Build SDA over the coming years.

⁶⁵ NDIA (2022). *Specialist Disability Accommodation: Operational guidelines*. National Disability Insurance Agency.

Appendix B: About the Housing Hub

The Housing Hub is an online community of people with disability and housing providers working together to create accessible housing options.

The Housing Hub website – www.housinghub.org.au – lists properties for rent or sale that may be suitable for people with disability. With over 2,000 properties currently listed, the Housing Hub features all design categories of Specialist Disability Accommodation (SDA), as well as many other types of accessible housing.



Housing seekers can search through the listings, or create a housing seeker profile by answering a few questions about where they want to live, what type of home they are looking for, what features are required and who they would like to live with. The Housing Hub will then show the seeker listed properties that are a good match for their profile. Each listing is displayed with a 'Suitability Score' that tells the seeker just how good a match the property is to their preferences. When creating a profile, housing seekers can also elect to be automatically notified when a property is listed that is a good match for their profile.

Generalised data resulting from housing seeker profiles on the Housing Hub provides insights into the demand for accessible housing across Australia. With around 15,000 new users and 72,000 page views every month – and around 500 enquiries generated to property owners per month – the insights generated are significant. Sharing the data gleaned from these interactions with the housing market enables the needs and preferences of people with disability to shape future development.

The first iteration of the Housing Hub was created by the Summer Foundation as a pilot project in 2017, with seed funding from the Australian Government Department of Social Services (DSS) Sector Development Fund. In its first year, the Housing Hub expanded from a few small regions to include housing located in many states across Australia.

The Housing Hub team began providing tenant matching services in 2018. To date, our team has supported more than 680 people to access SDA funding and move into a new SDA home.

Resources

The Housing Hub website contains libraries of resources for housing seekers, supporters, and housing providers – including videos, guides, and templates.

To explore, go to: www.housinghub.org.au/resources

Services for housing seekers

The Housing Hub team provides a range of services to support housing seekers. Via workshops, resources, and the SDA Housing Advice Line (1300 61 64 63), we support people with disability to:

- Understand the range of housing options that may be available to them
- Find out more about Specialist Disability Accommodation (SDA)
- Think about where they may want to live, what type of home they want to live in and who they want to live with
- Find out from the NDIS if they are eligible for SDA funding

The screenshot displays the Housing Hub website interface. At the top, there's a navigation bar with 'Find a Home', 'For housing providers', 'Resources', and 'Contact'. The main content area features a property listing for 'Quiet home in the suburbs' in Ivanhoe, VIC, 3079. The listing includes a large photo of the property, a suitability score of 86%, and a 'My Preferences' button. Below the main listing, there's a detailed description of the property, including its features (2 Bedroom, 2 Bathrooms, 1 Car park) and a 'Suitability Score' breakdown. The property is described as a 'House' that is 'Fully Accessible' and 'Bedroom Only'. It is noted that the property will accept MTA funding instead of SDA funding for up to 90 days. The listing also includes a 'Download application form' button, a 'Download brochure' button, and a 'Print Listing' button. The suitability score is 86%, and there is a 'View score breakdown' button. A 'My Preferences' button is also present at the bottom right of the listing.

Quiet home in the suburbs

Ivanhoe, VIC, 3079

Reasonable Rent Contribution as set by the NDIA [More info](#)

2 Bedroom 2 Bathrooms 1 Car park

House Fully Accessible Bedroom Only

Number of residents: 2

Posted 1 minutes ago Edited 1 minutes ago

Suitability Score

86%

[My Preferences](#)

Quiet home in the suburbs

Ivanhoe, VIC, 3079

Reasonable Rent Contribution as set by the NDIA [More info](#)

2 Bedroom 2 Bathroom 1 Car park

Bedroom Only Available 23/04/2021

*Plus 100% of Commonwealth Rent Assistance

*Plus 100% of the SDA funding in your NDIS plan

This property will accept MTA funding instead of SDA funding for up to 90 days

[Read more](#)

Suitability Score

86%

[View score breakdown](#)

[My Preferences](#)

SDA Information

Services for housing providers and vendors

The Housing Hub website is an effective way for providers and vendors of accessible housing to connect with suitable tenants. Providers can manage listings for their properties without needing to engage a third party, and prospective tenants can communicate with providers directly.

Developments in the Housing Hub's interface have dramatically improved the experience for housing providers and vendors, reducing the time it takes to list properties and simplifying the process – particularly for organisations with multiple properties to list.

It is free to use the Housing Hub to create property listings and receive inquiries from prospective tenants.

Premium services




The Housing Hub offers a tenant matching service for SDA providers on a fee-for-service basis. Our team identifies prospective tenants who may be a good fit for the SDA design category and features of the property, then supports prospective tenants to secure SDA funding and, if they wish to, apply for a vacancy at the property.

Generalised data resulting from housing seeker profiles on the Housing Hub can build an understanding of the demand for accessible housing. With insights into what types of housing (and housing features) are desired in what locations, providers can build to address demand with greater certainty. The Housing Hub regularly releases data insights to the market, while more detailed analyses are available for a fee. See <https://www.housinghub.org.au/for-housing-providers> for more information.

For a fee, providers and vendors can promote a listing as a 'Featured Property'. Featured properties appear on the homepage of the Housing Hub website and are promoted to housing seekers via the Housing Hub's social media channels and via email to our subscriber list of more than 6,000 housing seekers.

For more information on the Housing Hub's services for housing providers and vendors see <https://www.housinghub.org.au/for-housing-providers> or contact the Housing Hub's Customer Solutions Lead [via email](#) or by phoning 0455 119 100.

Featured Homes

| | | |
|---|---|---|
|  <p>North Eastern Melbourne ☆</p> <p>Bundoora VIC</p> <p>3 3 2 Villa</p> |  <p>Sydney Sutherland ☆</p> <p>Kirrawee NSW</p> <p>1 1 1 Apartment</p> |  <p>Adelaide Central Hills ☆</p> <p>Unley SA</p> <p>3 2 2 House</p> |
|---|---|---|

Appendix C: The Summer Foundation's role in the SDA Market

The following content aims to provide clarity on any perceived conflicts of interest between the Housing Hub team, Summer Foundation policy and research projects, and Summer Housing.

Summer Foundation

The Summer Foundation is a not for profit, established in 2006, that is committed to resolving the issue of young people living in aged care. The Summer Foundation commissioned 2 housing demonstration projects for younger people with disability living in, or at risk of admission to, nursing homes. The first project featured 2 apartments in Abbotsford, Victoria in 2013. The success of this first project was replicated with 10 more apartments in the Hunter region of NSW in 2016. The co-located apartment model was developed to enable people with high support needs (including young people in residential aged care and younger people at risk of entering residential aged care) to be able to live in their own apartment and be co-located to enable the cost-effective provision of support.

People with disability also need ways to effectively connect with housing that may be right for them. Recognising this deficit in the accessible housing market, the Summer Foundation created the [Housing Hub website](#) and an associated [Tenancy Matching Service](#) in 2017. The Housing Hub website is an online platform that supports housing seekers and housing providers to connect and is free for both housing seekers and housing providers. Housing providers can choose to pay for premium listings and bespoke data reports. The Housing Hub has over 1,400 housing providers listing both SDA and non-SDA properties.

The Summer Foundation is not an SDA provider and does not own any SDA funded apartments.

The Housing Hub's Tenancy Matching Service currently works with 6 SDA providers to identify potential tenants for new SDA projects in the pipeline. Those providers are Summer Housing, Enliven Housing, Insitu Housing, Guardian Living, Specialist Disability Accommodation Pty Ltd and Your Choice SDA. So far, the Tenancy Matching Service has supported more than 680 NDIS participants to receive a housing offer in New Build SDA, including 88 younger people who were living in residential aged care. The Tenancy Matching Service is a social enterprise that operates on a cost recovery basis as part of the Summer Foundation's Housing Hub initiative.

Through the work of the Tenancy Matching Service, the Housing Hub team has witnessed hundreds of SDA eligible NDIS participants going without effective support for accessing housing due to a lack of specialist housing support coordinators. As a result, a trial of a Support Coordination Service for home and living supports has been established. This is being undertaken in partnership with Onside, a registered support coordination provider.

There are more than 15 different disability organisations providing shared support to tenants living in SDA apartments across Australia. The Summer Foundation is not a NDIS provider and does not have any influence on the selection of disability support providers in SDA-funded apartments.

The Summer Foundation's position is that we want to see a whole range of dwelling types and housing options so that NDIS participants have a real choice. We do not have a vested interest in any particular dwelling type and promote the benefits of a diverse market with flexible support arrangements, tailored to the needs of individuals.