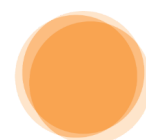


CHPs and Disability Housing: An Exploration of SDA

March 2022

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CHPs and Disability Housing: An Exploration of SDA

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DISCLAIMERS

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Acronyms

AIHW	Australian Institute of Health and Welfare
CHIA	Community Housing Industry Association
CHP(s)	Community Housing Provider(s)
LHA	Livable Housing Australia
LHDG	Livable Housing Design Guidelines
SDA	Specialist Disability Accommodation
SIL	Supported Independent Living
NCC	National Construction Code
NDIA	National Disability Insurance Agency
NDIS	National Disability Insurance Scheme

Introduction

Recent figures show that in Australia, over 4 million people have a disability,¹ which represents 18% of Australia's total population. Housing for people with disability is provided across different sectors, with community housing providers (CHPs), government, community organisations and now Specialist Disability Accommodation (SDA) providers playing a role.

Government funding for SDA through the National Disability Insurance Scheme (NDIS) became available in 2016 for NDIS participants with extreme functional impairment or very high support needs. SDA is intended to provide eligible NDIS participants with housing that increases their independence and maximises social and economic participation, while delivering value for money. A well-designed home in the right location can allow for more independent living arrangements, increased community connection and access to informal supports.² The SDA model of funding is designed to create a demand-driven market where individuals can make decisions about the property they will access with the SDA funding allocated in their NDIS plans.³

SDA design categories and building types

To enrol an SDA property with the National Disability Insurance Agency (NDIA), SDA providers submit information on the design category, building type, number of bedrooms, and location of the dwelling.⁴ New build SDA dwellings are enrolled with the NDIA in 1 of 4 design categories. Older SDA properties that don't have any special design features may be 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.

¹ AIHW (2020). 'People with Disability in Australia.' Australian Institute of Health and Welfare.
<https://www.aihw.gov.au/reports/disability/people-with-disability-in-australia/contents/summary>

² Oliver, S., Gosden-Kaye, E. Z., Winkler, D., & Douglas, J. M. (2020). 'The Outcomes of Individualised Housing for People with Disability and Complex Needs: A Scoping Review.' *Disability and Rehabilitation*, 1-15.
<https://www.tandfonline.com/doi/full/10.1080/09638288.2020.1785023>

³ Winkler, D., McLeod, J., Mulherin, P., Rathbone, A., and Ryan, M. (2020). 'Specialist Disability Accommodation (SDA) Explainer for Investors.' Summer Foundation and JBWere.
https://www.summerfoundation.org.au/wp-content/uploads/2021/02/2020_Winkler_SDA-Explainer-for-investors.pdf

⁴ NDIA (2022). 'Specialist Disability Accommodation.' National Disability Insurance Agency.
<https://ourguidelines.ndis.gov.au/supports-you-can-access-menu/home-and-living-supports/specialist-disability-accommodation>

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 don't impact the tenants and so that any noise the tenants make doesn't 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 five NDIS participants.

Larger Dwellings – properties that house more than five 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.

The NDIA estimates that up to 30,000 people with disability – or 6% of all NDIS participants – will be receiving SDA payments by 2025.⁵ As of 31 December 2021, there were 502,413 participants in the NDIS and over 18,900 SDA places enrolled with the NDIA, including 'in-kind' arrangements with state and territory governments.⁶ With only 16,972 NDIS participants receiving SDA funding⁷, however, supply is currently greater than available demand for SDA housing. According to the NDIA's estimate, over 13,000 NDIS participants who are eligible for SDA are yet to be identified.

Non-SDA housing is available for the 94% of NDIS participants who are not eligible for SDA. This includes public housing, social and affordable housing, housing provided by disability support organisations and the mainstream housing market.

As CHPs manage social and affordable housing, they play a key role in providing housing to people with disability right across Australia. In fact, four in ten social housing households in Australia accommodate one or more people living with disability.⁸ However, many older social housing properties are not specifically designed to meet the needs of people with disability. As such, there continues to be an urgent need for more accessible housing so that people with disability can live more independently.

⁵ Senate Community Affairs Legislation Committee (2021) 'Answer to Question on Notice, Social Services Portfolio, Additional Estimates. Question No: NDIA SQ21-000118'.

https://www.aph.gov.au/Parliamentary_Business/Senate_estimates/ca/2020-21_Additional_estimates

⁶ NDIA (2022). 'NDIS Quarterly Report to Disability Ministers: Q2 2021-2022.' National Disability Insurance Agency. <https://www.ndis.gov.au/about-us/publications/quarterly-reports>

⁷ NDIA (2022). 'NDIS Quarterly Report to Disability Ministers: Q2 2021-2022.'

⁸ AIHW (2019). 'National Social Housing Survey 2018: Key Results.' Australian Institute of Health and Welfare. <https://www.aihw.gov.au/getmedia/46555204-b4ca-4429-9d1a-a1797e6a06cd/aihw-hou-311.pdf.aspx?inline=true>

According to the Australian Building Codes Board, accessible housing is defined as properties that include features which enable people with a disability to live independently.⁹ In July 2010, the Livable Housing Design Guidelines (LHDG) were introduced by Livable Housing Australia (LHA).¹⁰ These guidelines provide useful information for incorporating design features into new construction or within an existing home undergoing renovation or refurbishment. There are 3 levels of certification: silver, gold and platinum, which range from the lowest level of accessibility and liveability (silver), though to the highest level of accessibility and liveability (platinum).¹¹

In April 2021, it was announced that the LHDG would become part of national housing regulations, with new minimum accessibility standards (that is, silver level of accessibility) becoming mandatory in the National Construction Code (NCC).¹² It is yet to be seen if these changes will be universally applied across Australia, as not every state and territory has committed to implementing the new code. Nevertheless, this change has been deemed as a breakthrough for accessibility – particularly for older Australians and people with disability – as it facilitates people staying in their homes for longer.

As of June 2019, there were over 500 CHPs across Australia.¹³ Despite this, research exploring the role of CHPs in providing accessible housing to people with disability is lacking.

While CHPs are also participating in the SDA market, a recent report released by the Summer Foundation and the Housing Hub showed that the development of SDA housing is largely dominated by other types of organisations such as private housing providers (40.3%) and not-for-profit disability service providers (21.0%).¹⁴ Only 11.3% were CHPs. To date, there is a lack of understanding as to why CHPs appear to be relatively absent in the SDA market.

This survey explored the participation of CHPs in the disability housing market, to understand the challenges, barriers and opportunities for CHPs who are providing housing to NDIS participants who are funded for SDA. This survey asked providers to reflect on their experiences to date, and provide information on a range of issues, including:

- Confidence in the SDA market
- Challenges related to finding tenants and filling vacancies
- Impact of changes to the National Construction Code

The survey also asks providers to suggest possible changes to the SDA market.

⁹ ABCB (2018). 'Accessible Housing.' Australian Building Codes Board.
<https://www.abcb.gov.au/initiatives/accessible-housing>

¹⁰ Livable Housing Australia. 2017. "Livable Housing Design Guidelines." Available from
https://livablehousingaustralia.org.au/wp-content/uploads/2021/02/SLLHA_GuidelinesJuly2017FINAL4.pdf

¹¹ Livable Housing Australia. 2017. "Livable Housing Design Guidelines." Available from
https://livablehousingaustralia.org.au/wp-content/uploads/2021/02/SLLHA_GuidelinesJuly2017FINAL4.pdf

¹² Commonwealth Government (2021). 'Building ministers' meeting: Communique April 2021.'
<https://www.industry.gov.au/news/building-ministers-meeting-communique-april-2021>

¹³ AIHW (2020). 'Housing Assistance in Australia 2020.' Australian Institute of Health and Welfare.
<https://www.aihw.gov.au/reports/housing-assistance/housing-assistance-in-australia-2020/contents/social-housing-dwellings>

¹⁴ Aimers, N., Wellecke, C., Winkler, D., Rathbone, A., & Mulherin, P. (2021). 'Specialist Disability Accommodation Supply in Australia'. Melbourne, Australia: Housing Hub and Summer Foundation.
<https://www.summerfoundation.org.au/resources/specialist-disability-accommodation-supply-in-australia-november-2021/>

Method

This study involved a survey of CHPs across Australia to explore their participation in the disability housing market. PowerHousing and the Community Housing Industry Association (CHIA) sent the survey link to their members in January 2022. The survey closed on 11 February 2022. The survey consisted of three sections: 'About you', 'Disability Housing and SDA' and 'Changes and Opportunities'.

The survey took approximately 10-15 minutes to complete. Providers were advised that their participation was voluntary, that their responses were strictly confidential and that only aggregated data would be published. Quantitative results were analysed using *R*, while Excel was also used for the analysis of qualitative data.

Results

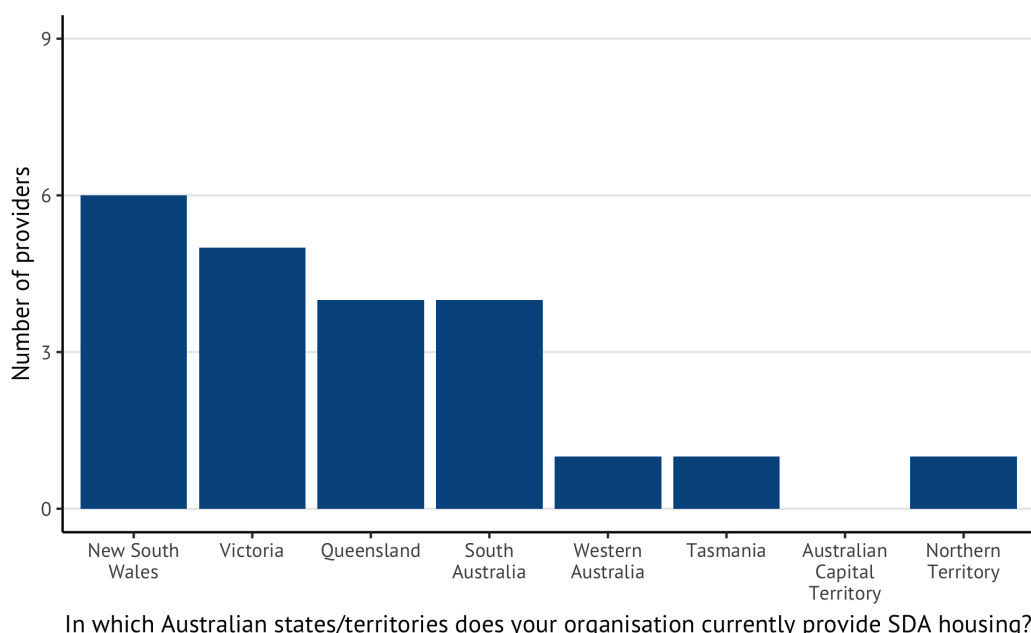
Description of participants

A total of 26 CHPs completed the survey. Of these, 50% ($n = 13$) were registered SDA providers. Almost all of the following analyses are based on these 13 SDA CHPs.

Location of CHP-provided SDA

New South Wales was the most common state in which respondents were currently providing SDA (46.2%). This was followed by Victoria (38.5%), Queensland (30.8%) and South Australia (30.8%). No respondent was currently providing SDA in the Australian Capital Territory. Refer to Figure 1.

Figure 1 – Number of respondents supplying housing in each state and territory in Australia ($n = 13$)



Note: Respondents were able to select multiple options.

SDA stock

Enrolled stock

Twelve of the 13 respondents (92.3%) who were registered SDA providers indicated that they currently have SDA stock enrolled with the NDIA. Only one respondent did not have any enrolled SDA stock. This provider also reported not having any interest in exploring SDA in the next two to three years.

Among the 12 respondents who reported having enrolled SDA stock, SDA dwellings comprised an average of 6.7% (range 1-31%) of all housing that they manage.

Eleven respondents also reported the number of SDA places they have. There was a large range in responses, with some respondents having less than 10 SDA places, while one provider reported having up to 1,000 SDA places. Combined, the providers had a total of 2,485 places for SDA tenants. These places can accommodate 14.6% of the 16,972 NDIS participants who are receiving SDA funding as of 31 December 2021.¹⁵

Vacancies

Of the 2,485 enrolled SDA places, 262 places (10.5%) are currently vacant. One provider reported having a vacancy rate of 35.4%.

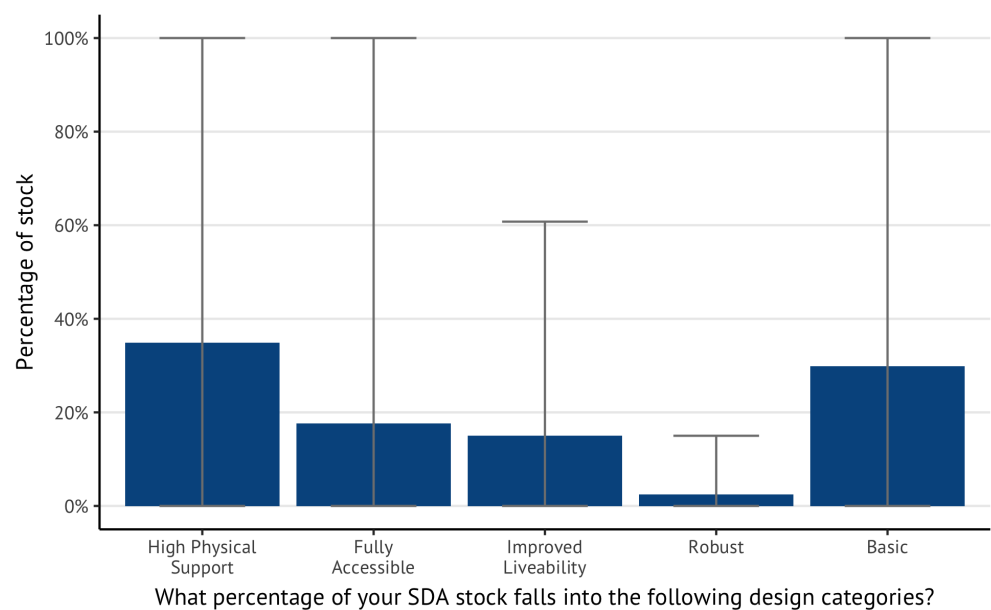
Design categories

Figure 2 shows the distribution of design categories in respondents' SDA stock. The blue bars show the average percentage for each design category – these averages can indicate the distribution of design categories in a typical SDA portfolio among CHPs. The grey bars show the minimum and maximum percentages reported across individual respondents, thus indicating the amount of variation between providers' portfolios.

High Physical Support was on average the most common design category at 34.9%, followed by Basic design at 29.9%. However, there was a large degree of variation for these two design categories among respondents, with some respondents reporting not having any High Physical Support SDA dwellings while others had allocated 100% of their SDA stock to this design category. Robust SDA was the least common design category, comprising on average only 2.5% of all respondents' SDA stock. Even the respondent with the highest percentage of Robust SDA had allocated only 15% of their stock to the Robust design category.

¹⁵ NDIA (2022). 'NDIS Quarterly Report to Disability Ministers: Q2 2021-2022.'

Figure 2 – Average percentages and range of SDA design categories (n = 12)

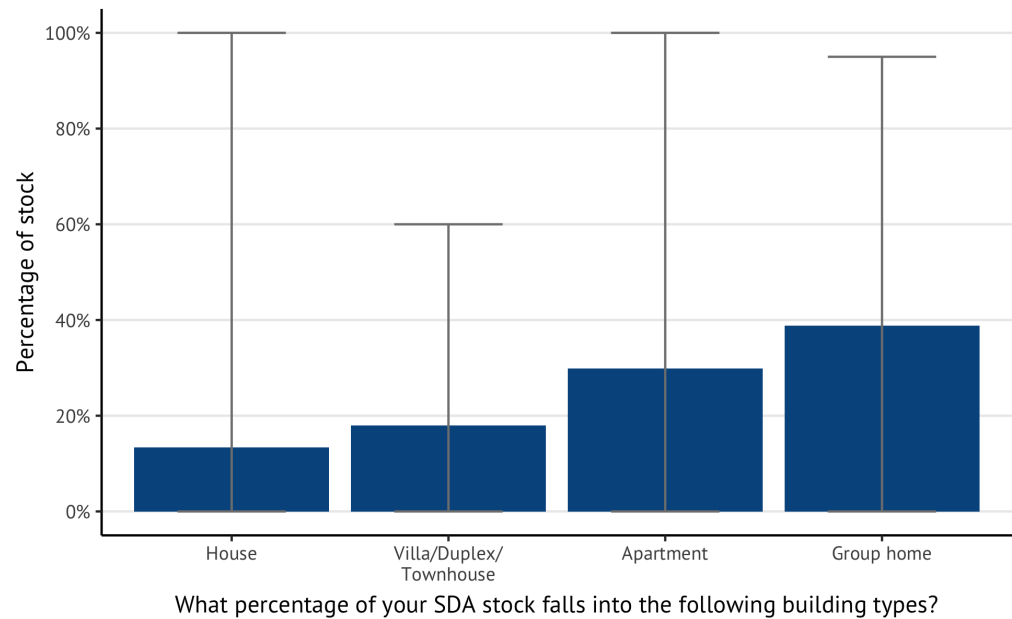


Note: Blue bars indicate the average percentage; grey bars indicate the range of percentages across respondents.

Building types

Figure 3 indicates the percentage of respondents’ SDA stock for each building type. Group homes were the most common building type, comprising on average 38.8% of respondents’ SDA stock. This was followed by apartments at 29.8%. However, there was again a large degree of variation between providers for both apartments and group homes, as indicated by the grey bars.

Figure 3 – Average percentages and range of SDA building types (n = 12)



Note: Blue bars indicate the average percentage; grey bars indicate the range of percentages across respondents.

Committed capital

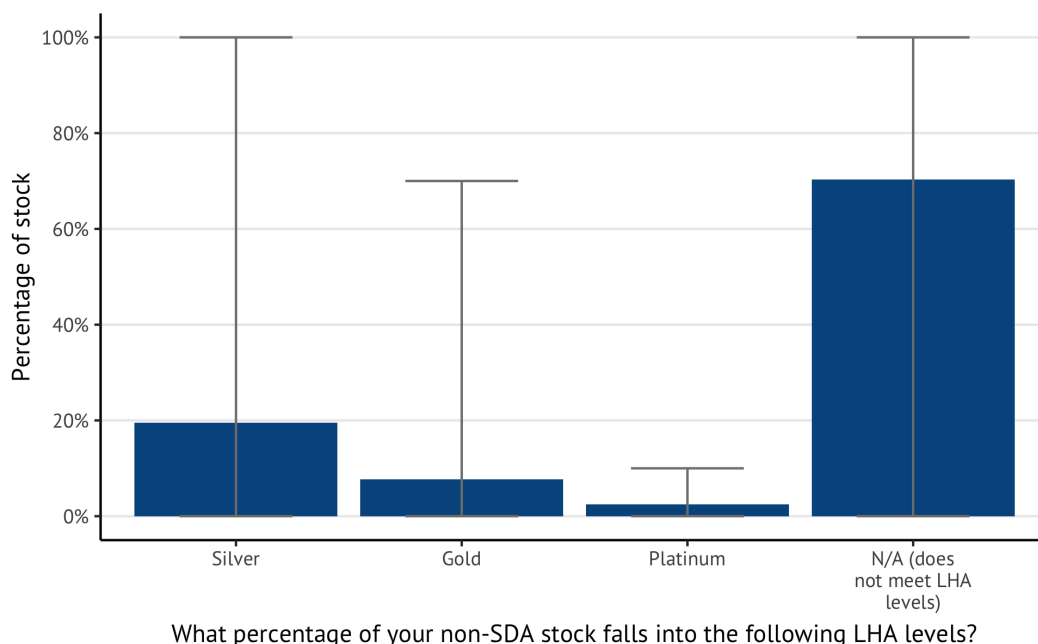
Seven providers reported the amount of capital they have committed to building SDA. The amount varied widely between providers, with the lowest amount committed being \$1.8 million and the highest amount being \$210 million. The combined total amount of capital committed across the seven respondents was \$323.8 million.

Accessibility of non-SDA stock

Providers were also asked to indicate the percentage of their non-SDA stock that meets the Livable Housing Design Guidelines (LHDG; see Figure 4). As with the above analyses, these percentages are based only on responses from CHPs who were registered SDA providers.

As can be seen, the majority of non-SDA dwellings (70.3%) did not meet any of the LHDG, though there was again a large degree of variation between responses. The most common design level was silver at 19.5%, and the least common design level was platinum at 2.5% of reported dwellings. It can be expected that the percentage of non-SDA dwellings that meet the LHA silver level will increase as minimum accessibility standards are introduced to the NCC in 2022.

Figure 4 – Average percentages and range of non-SDA following LHA levels ($n = 11$)

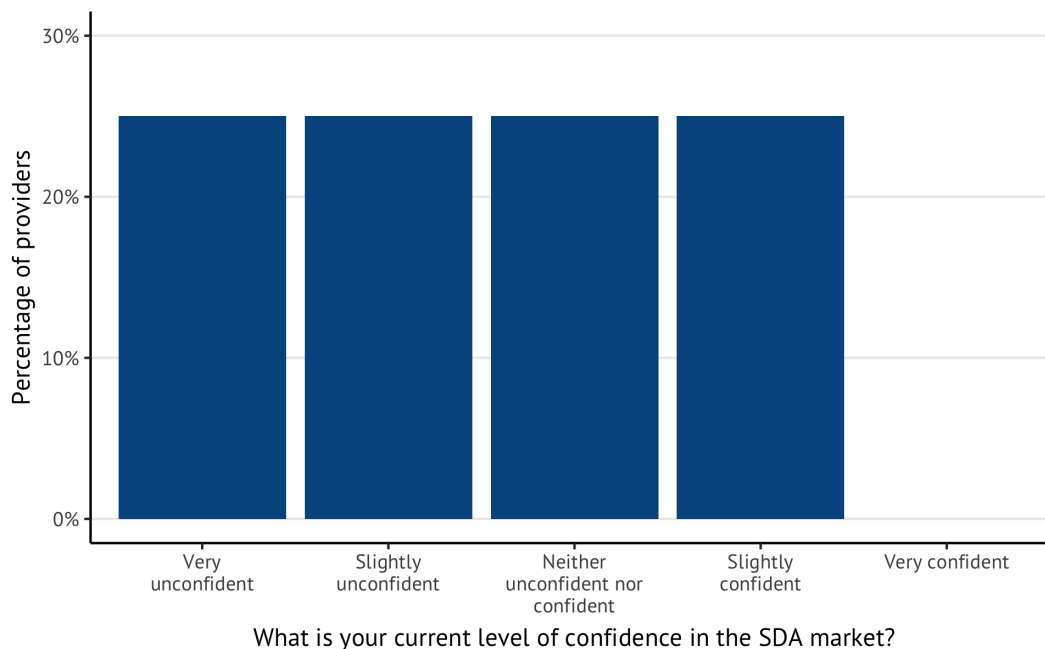


Note: Blue bars indicate the average percentage; grey bars indicate the range of percentages across respondents.

Provider confidence in the SDA market

Providers were asked to indicate and discuss their current level of confidence in the SDA market. As can be seen in Figure 5, half of all respondents reported being very or slightly unconfident. Only 25% of respondents indicated being slightly confident, and no respondent felt very confident in the SDA market.

Figure 5 – Provider confidence in the SDA market ($n = 12$)



Explanations of providers' confidence levels were analysed thematically and three themes emerged to explain unconfidence in the SDA market. The first theme was **lack of market stewardship by the NDIA** ($n = 10$). This included unclear and complex policy and processes, SDA decisions not aligning with participant eligibility and evidence, lengthy decision timeframes, lack of transparency about funding decisions, lack of reliable demand data, lack of service innovation, lack of separation between SDA and SIL to promote independent living for people with disability and lack of demand activation by the NDIA which causes issues such as vacancy risk.

“Changing and inconsistent NDIS policies and operational processes have caused unforeseen levels of vacancy in new-build SDA, hampered service innovation, and resulted in many poor outcomes for people with disability, and CHP SDA Providers who had committed to support SDA delivery. At a programmatic level for our company, the planning, service design and implementation of SDA operations continues to be fraught.”

“[There is] no security that a participant will be available once properties have been completed.”

- SDA community housing providers

The second theme was the **impact of Covid-19** (n = 2), particularly on property development and vacancy rate.

“We have had two SDA apartments on the market for almost 12 months, while there has been interest we have been unable to tenant them. Challenges have been [due to] COVID restrictions...”

- SDA community housing provider

The third theme was **financial concern** (n = 2) that the SDA market was not financially viable due to reasons such as the SDA price guide not being reflective of the actual costs involved in the current climate, such as the cost of land.

‘Further to the operational issues, unforeseen cost increases in land and construction have impacted the feasibility of some pipeline projects developed under current SDA Pricing Arrangements, particularly in the absence of information from the NDIA about exactly what type of SDA is required and where. Over the long term, we assume the environment will stabilise as it must.’

- SDA community housing provider

Challenges related to finding SDA tenants

Providers were asked to rate the extent to which certain aspects of finding SDA tenants are challenging – see Figure 6. The most challenging aspect was finding tenants with the right level of SDA funding in their plans, with 83.4% finding this aspect ‘moderately’ or ‘extremely’ challenging. This was followed by assessing the SDA eligibility of potential tenants and assessing the suitability of tenants for a particular model of housing and support, both of which were reported to be ‘moderately’ or ‘extremely’ challenging by 75% of respondents.

Figure 6 – Extent of various challenges associated with finding SDA tenants (n = 12)

	How challenging are the following aspects of finding tenants for your SDA?				
	Not challenging	Slightly challenging	Somewhat challenging	Moderately challenging	Extremely challenging
Assessing the suitability of tenants for a particular model of housing and support	0.0%	16.7%	8.3%	33.3%	41.7%
Assessing the SDA eligibility of potential tenants	0.0%	16.7%	8.3%	25.0%	50.0%
Finding tenants with the right level of SDA funding in their NDIS plans	0.0%	0.0%	16.7%	16.7%	66.7%
Finding tenants who are interested in moving in	8.3%	8.3%	33.3%	25.0%	25.0%

Providers were also asked to describe any other challenges they are facing in relation to finding SDA tenants. These responses were analysed thematically and four themes emerged. The first was **lack of cohesive relationships between parties involved in the SDA journey** ($n = 5$) – particularly between SDA and SIL providers, due to a lack of separation between housing and support being offered to tenants. The second theme was **lack of market stewardship by the NDIA** ($n = 3$) – including limited demand data available, issues with demand activation and the SDA Finder website not advertised or utilised well.

“We are aware of the high number of young people with a disability living in aged care [but we] cannot identify these people.”

- SDA community housing provider

Other challenges to finding SDA tenants mentioned by some providers were **complexity and compatibility between tenants** ($n = 2$) and **location of tenants** ($n = 1$), particularly in regional areas.

“Working with tenants in group households. Just because they share a disability does not mean people want to share accommodation.”

- SDA community housing provider

Challenges related to filling SDA vacancies

Challenges associated with filling SDA vacancies are split into two separate figures below. As can be seen in Figure 7, over 90% of respondents reported that the time the NDIA takes to make funding decisions about SDA and supports was ‘moderately’ or ‘extremely’ challenging. No respondent reported that these two aspects of filling SDA vacancies are not challenging.

Figure 7 – Extent of various challenges associated with filling SDA vacancies ($n = 12$)

	How challenging are the following aspects of filling vacancies in your SDA?				
	Not challenging	Slightly challenging	Somewhat challenging	Moderately challenging	Extremely challenging
Logistics of tenants moving in	16.7%	16.7%	16.7%	41.7%	8.3%
Time NDIA takes to make decisions about funding for assistive technology	8.3%	0.0%	33.3%	16.7%	41.7%
Time NDIA takes to make support decisions	0.0%	0.0%	8.3%	25.0%	66.7%
Time NDIA takes to make SDA decisions	0.0%	0.0%	8.3%	8.3%	83.3%

Similarly, 91.6% of respondents reported that they find it 'moderately' or 'extremely' challenging that identified tenants have received an SDA determination that is not aligned with their housing preference and evidence provided (see Figure 8). This was followed by working with support teams to gather quality evidence for SDA determinations, which was reported to be 'moderately' or 'extremely' challenging by 75% of respondents. Encouragingly, half of all providers reported that recent changes to 'Congierge' funding were 'not' or only 'slightly' challenging.

Figure 8 – Extent of various challenges associated with filling SDA vacancies ($n = 12$)

	How challenging are the following aspects of filling vacancies in your SDA?				
	Not challenging	Slightly challenging	Somewhat challenging	Moderately challenging	Extremely challenging
Getting home modifications and assistive technology (AT) in their plans	25.0%	16.7%	25.0%	16.7%	16.7%
Working with Supported Independent Living (SIL) providers to set up on-site overnight assistance (OOA) and associated funding	16.7%	16.7%	16.7%	25.0%	25.0%
Identified tenants have received an SDA determination that is not aligned with their housing preference and evidence provided	8.3%	0.0%	0.0%	33.3%	58.3%
Working with support teams to gather quality evidence for SDA determinations	0.0%	0.0%	25.0%	41.7%	33.3%
Recent changes to 'Congierge' funding	41.7%	8.3%	16.7%	8.3%	25.0%

Providers were asked if there are any other aspects that are challenging to filling SDA vacancies. Using thematic analysis of these responses, two other challenges were identified.

The first challenge related to the **funding system**, which participants ($n = 7$) described as being confusing and a key challenge. This included delays in assessments or service reviews for funding decisions and receiving funding. Respondents also spoke about challenges related to gaps between funding expectations and what participants are funded for, including participants receiving funding for shared rather than independent living.

“When SDA funding in NDIS plan stipulate participants have to share, so they are not having the ability to be independent and allowed to occupy a property on their own.”

“[...] always a gap in what the category funding price guide is towards what the participant is actually funded for.”

- SDA community housing providers

Two respondents expressed that a **better planning pathway** is needed. It was reported that the planning pathway to support desired long-term housing outcomes needs to be better understood and supported by all stakeholders, including the NDIA, support coordinators and SIL providers.

“The journey for individuals is not well understood in achieving their desired housing outcomes. Support Coordinators etc are often in crisis mode and dealing with the here and now and want a house immediately which is just not possible. A better planning pathway on the journey needs to be supported by the NDIA.”

- SDA community housing provider

Challenges once tenants have moved in

The most challenging aspect reported once tenants have moved in were issues with service bookings, with 75.0% of respondents classifying this aspect as ‘extremely’ challenging. NDIS plans expiring and securing the payment of SDA funds by the NDIA were also reported to be ‘moderately’ or ‘extremely’ challenging by 66.6% and 50.0% of respondents, respectively. Encouragingly, the majority of providers did not find issues with the on-site overnight assistance provider (75.0%) or issues within the tenancy that they need to get involved in (58.3%) as challenging.

Figure 9 – Extent of various challenges for business once SDA tenants have moved in ($n = 12$)

	How challenging are the following aspects once tenants have moved in to your SDA?				
	Not challenging	Slightly challenging	Somewhat challenging	Moderately challenging	Extremely challenging
Issues with the on-site overnight assistance (OOA) provider	75.0%	16.7%	0.0%	8.3%	0.0%
Issues within the tenancy that you need to get involved in	58.3%	16.7%	16.7%	8.3%	0.0%
Issues with service bookings	16.7%	0.0%	8.3%	0.0%	75.0%
NDIS plans expiring	0.0%	8.3%	25.0%	8.3%	58.3%
Securing the payment of SDA funds by the NDIA	0.0%	16.7%	33.3%	16.7%	33.3%

Thematic analysis of an open-ended question identified two additional aspects that are challenging to providers once tenants have moved in.

First, **funding issues** ($n = 5$) were reported to remain an issue even after tenants have moved into an SDA property. This included issues regarding sourcing funding for home modifications, as well as issues with service bookings that are taxing and disrupting consistent cash flow. Respondents also noted that wrong funding determinations can result in damage to properties.

“Damage to SDA and related repair payments; for example where a person has only been approved for IL [Improved Liveability] but treatment of the dwelling indicates a need for Robust.”

“The SDA model of funding is flawed. Whilst the NDIA says that you have funding for life, the annual / 3 year renewal resulting in new service bookings creates significant cash flow issues and is taxing of resources that could be utilised better elsewhere.”

- SDA community housing providers

The second challenge related to a **lack of partnership and communication between stakeholders** ($n = 4$). These stakeholders included support providers, tenants, and the tenancy team. For example, respondents noted a lack of response to queries and that maintenance issues are often not reported. Expectations were also not always clearly communicated, leading to misunderstandings in the use of private funding and role confusion between stakeholders.

“SIL Providers moving tenant's in once SIL has been approved and not notifying Tenancy Team - Therefore they are making the offer of accommodation which is outside of their realm.”

“Again the reliability and ability to work in partnership with the SIL is vital.”

- SDA community housing providers

Changes to the SDA market

Providers were asked what changes they would make to the SDA market, if given the opportunity. Responses were analysed thematically and two main themes arose. Four providers stated that there is a need to **separate the provision of housing and support**.

“[The NDIS Quality and Safeguards Commission] must ensure separation of housing from supports and generally enforce requirements for conflicts of interest management.”

- SDA community housing provider

Six providers reported that there is a **need to improve NDIA processes**. This includes transparency regarding eligibility criteria, funding timelines, and decision-making.

“Clarity and responsiveness from NDIS in processes; quick processes; not changing the game to make it more difficult for people needing SDA - stick to the intent.”

- SDA community housing provider

Some respondents also commented on the need for more education generally for the sector, including for providers and support coordinators.

SDA pipeline

Providers were asked if they have a current pipeline of SDA dwellings. Pipeline dwellings were defined as SDA that is not enrolled, but is one of the following: land secured; waiting for building approval and/or finance approved; under construction; or pending enrollment with the NDIA. Eight respondents (66.7%) reported having a current SDA pipeline; four respondents (33.3%) did not have a current pipeline.

Reasons for not having a current pipeline were the high land and building costs, the uncertainty of finding SDA tenants, as well as focusing on other organisational priorities due to COVID-19. Two respondents also expressed an interest in developing future SDA dwellings; however, they were working with external developers to build SDA, or were currently waiting on government grants.

Number of SDA dwellings and places in the pipeline

Of the eight providers who indicated a current SDA pipeline, six providers reported the number of dwellings and five providers reported the number of places in their pipeline. The total reported pipeline was 304 SDA dwellings, with 663 places for SDA eligible tenants. The number of SDA pipeline places varied strongly across respondents, with the lowest number of places being 5 and the highest number being 500.

Future plans for SDA dwellings beyond the current pipeline

Of the eight providers who reported a current SDA pipeline, six providers indicated whether they have future plans for building more SDA dwellings. While half of the providers ($n = 3$) reported they were planning to build more SDA dwellings, the other half ($n = 3$) were unsure.

Impact of changes to the National Construction Code

Out of all survey respondents, 23 providers discussed the impact that the inclusion of minimum accessibility standards in the 2022 National Construction Code (NCC) will have on their organisation. Note that these respondents also included CHPs who were not registered SDA providers. Using thematic analysis, four themes were identified across the responses.

Almost half of respondents ($n = 11$) expressed that the minimum accessibility standards will have a **limited impact** on their organisation – partly because providers were reportedly already implementing accessible design standards in their developments.

"I believe it will be minimal, as we tend to go beyond existing requirements with the provision of adaptable and accessible units in our new builds."

- Community housing provider

Six providers believed that the new standards would have an impact on **costs and effort**. Respondents stated they might face increased costs, such as building costs, and that they may need to review existing building plans. This impact might be particularly noticeable for dwellings on smaller sites.

"[...] on sites that are tight it has the potential to make projects less viable I guess."

"There will be an increase in building costs."

- Community housing providers

Respondents also noted a **positive impact on the market and people with disability** ($n = 5$). For example, accessible housing design was reported to better meet the needs of people with disability, leading to increased liveability and tenant satisfaction. Respondents also believed that the minimum accessibility standards would be beneficial to their own organisation by improving clarity and easing decision making.

"I expect that our current tenants will be moved on to more suitable accommodation for their disability needs."

"[...] a very positive step to support tenants."

- Community housing providers

A small number of providers reported that they were **unsure** ($n = 1$) if the standards would have an impact on their organisation, or they believed the standards would **not be applicable** ($n = 3$) to their organisation. For example, some providers stated the standards will not be applicable because their organisation is not building new dwellings, or because they are located in a state that has not yet committed to the minimum accessibility standards.

"It will probably only impact on any new builds of which we aren't usually involved in."

- Community housing provider

Other opportunities for CHPs

Respondents were asked to comment on perceived opportunities for CHPs in the area of disability housing more generally. Four providers noted that there was a need to **focus on people with disability who may not be eligible for SDA**, but who nonetheless have specific housing needs:

"Disability housing for residents that don't attract SDA is a forgotten group."

- Community housing provider

Some respondents emphasised the overall **opportunity for CHPs to also supply SDA** ($n = 4$).

"Definitely opportunities for larger organisations to diversify their operations and fill a gap in the market."

- Community housing provider

Discussion

This survey explored the participation of CHPs in the disability housing market, to understand the challenges, barriers and opportunities for CHPs who are providing housing to NDIS participants who are funded for SDA. This survey asked providers to reflect on their experiences to date, and to provide information on a range of issues, including:

- Confidence in the SDA market
- Challenges related to finding tenants and filling vacancies
- Impact of changes to the National Construction Code

The survey also allowed providers to suggest possible changes to the SDA market.

Of the 26 CHPs involved in this survey, 13 were registered SDA providers. Collectively, these providers reported to have 2,485 places for SDA tenants, which represents 14.6% of all people with SDA funding across Australia.¹⁶ To date, the combined total of capital committed in the SDA market by these providers was over \$323 million, which represents approximately 13.1% of the market share.¹⁷

The survey revealed that half of all CHPs that were registered SDA providers lacked confidence in the SDA market. Only 25% of respondents indicated being slightly confident, and no respondent felt very confident in the SDA market. Explanations of providers' confidence levels were analysed thematically and the lack of market stewardship by the NDIA was identified as the primary driver. Market stewardship issues that were identified include unclear and complex policy and processes, SDA decisions not aligning with participant eligibility and evidence, and lengthy decision timeframes. Also included was a lack of transparency about funding decisions, lack of reliable demand data, lack of service innovation, lack of separation between SDA and SIL to promote independent living for people with disability and lack of demand activation by the NDIA.

Provider confidence levels may also be attributed to the finding that some providers are carrying significant commercial risks. Over 10% of SDA places are vacant, with one provider reporting a vacancy rate of 35.4%. The resulting financial losses make building SDA housing riskier for providers, as they are not guaranteed to receive financial returns on their investments in a timely manner. This is consistent with another report that also found that vacancies pose one of the biggest financial risks to SDA investors.¹⁸

¹⁶ NDIA (2022). 'NDIS Quarterly Report to Disability Ministers: Q2 2021-2022.'

¹⁷ Calculated based on the number of enrolled SDA (excluding "in-kind" arrangements with state governments) multiplied by an approximate cost per dwelling: 4,921 dwellings * \$500,000 per dwelling = \$2.46 billion.

¹⁸ Winkler, D., McLeod, J., Mulherin, P., Rathbone, A., and Ryan, M. (2020). 'Specialist Disability Accommodation (SDA) Explainer for Investors.' Summer Foundation and JBWere.

https://www.summerfoundation.org.au/wp-content/uploads/2021/02/2020_Winkler_SDA-Explainer-for-investors.pdf

The findings of this survey suggest that inappropriate SDA determinations, together with lengthy and complex SDA processes, are the main reasons why providers experience difficulties finding tenants and filling vacancies. This is again consistent with previous research¹⁹. The majority of CHPs reported that finding tenants with the right level of SDA in their plans was ‘moderately’ or ‘extremely’ challenging, as was tenants receiving SDA determinations that do not align with their housing preference and evidence provided. As previous research has found,²⁰ there is often a mismatch between available SDA properties and the specific SDA payment approved in participants' NDIS plans. Specifically, there has been a common trend over the past 18 months for NDIS participants to experience difficulties securing funding for 1 resident dwellings, even with evidence showing this is needed. Moreover, some NDIS participants with SDA in their plans could have a ‘Basic’ level of SDA approved and are therefore living in legacy stock. This level of SDA funding does not allow the NDIS participant to move into new build SDA that has more appropriate design features. Another notable challenge in finding tenants and filling vacancies was the time taken by the NDIA to make SDA and support decisions. Collectively, these findings highlight that the NDIA needs to take a more active stewardship role in the SDA market. This should involve more efficient and timely processing of SDA and support applications that align with participant needs and preferences. It should also involve increased transparency regarding eligibility criteria and reasons surrounding the NDIA's decision making.

In addition to suggesting that the NDIA needs to make process improvements such as those mentioned above, providers emphasised the need for more education and training for NDIA staff and other SDA organisations, including SDA and SIL providers and support coordinators. This is again consistent with the findings of the previous research.²¹

Enforcing the separation of the provision of housing and support was also mentioned by some providers. Separate provision of housing and support services enables choice and control for SDA tenants, giving people the freedom to choose and change support providers without changing their dwelling. The NDIA requires that housing and supports be provided by separate organisations within SDA settings. In fact, the NDIS Quality and Safeguards Commission (2020) notes that “each participant’s right to exercise choice and control over other NDIS support provision is not limited by their choice of specialist disability accommodation dwelling” (p.38).²² However, as identified in the most recent SDA Supply in Australia report,²³ many SDA providers still report that their tenants’ choice of supports is in some way limited and therefore, does not align with NDIA policy. Many CHPs who responded to this survey provide places for SDA tenants in group homes, which is likely to explain the limited separation model used by some providers.

¹⁹ Winkler, D., Aimers, N., Rathbone, A., Douglas, J., Wellecke, C., Goodwin, I., & Mulherin, P. (2021). ‘Specialist Disability Accommodation Provider Experience Survey’. Melbourne, Australia: Housing Hub and Summer Foundation. <https://apo.org.au/node/316937>

²⁰ Ibid.

²¹ Ibid.

²² National Disability Insurance Scheme Quality and Safeguards Commission. (2020). NDIS practice standards and quality indicators (Version 3). <https://www.ndiscommission.gov.au/providers/ndis-practice-standards>

²³ Aimers, N., Wellecke, C., Winkler, D., Rathbone, A., & Mulherin, P. (2021). ‘Specialist Disability Accommodation Supply in Australia’. Melbourne, Australia: Housing Hub and Summer Foundation. <https://www.summerfoundation.org.au/resources/specialist-disability-accommodation-supply-in-australia-november-2021/>

While many CHPs will be affected by the changes to the NCC in 2022, almost half of providers reported that these changes will have a limited impact because the LHDG were already implemented in their developments. Interestingly, this appears to contradict the finding that only a small proportion (19.5%) of respondents' non-SDA stock is built to LHA silver level. Indeed, the majority of non-SDA dwellings (70.3%) reported by providers in this survey did not meet any of the LHDG. This could potentially indicate confusion among providers around the design requirements of the new minimum accessibility standards in the NCC, though it is also possible that the introduction of the minimum accessibility standards will be reflected when developments in their pipeline are completed. This may warrant further investigation.

A number of providers reported that inclusion of minimum accessibility standards will have a positive impact on their organisation, because the change will lead to better tenant outcomes and decision making. This aligns with LHA, who stipulate that the LHDG define "best practice standards, providing a common language and reference point for livable housing in design and construction".²⁴

While not all providers put forward opportunities for CHPs in the disability housing market, the opportunity to focus on people with disability who do not receive SDA funding was reinforced. The role of CHPs is critical in providing suitable and accessible housing for the vast majority (94%) of NDIS participants who are not eligible for SDA. The opening was highlighted for CHPs who are not registered SDA providers to step in, diversify their operations and use their expertise to deliver quality services for tenants. However, it is acknowledged that this may not occur until the NDIA implements change to SDA processes and takes a more active stewardship role in leading this emerging yet vulnerable market.

²⁴ Livable Housing Australia. 2020. "Livable Housing Design Guidelines." Available from <https://livablehousingaustralia.org.au/>

Appendix A: List of contributors who provided consent for publication

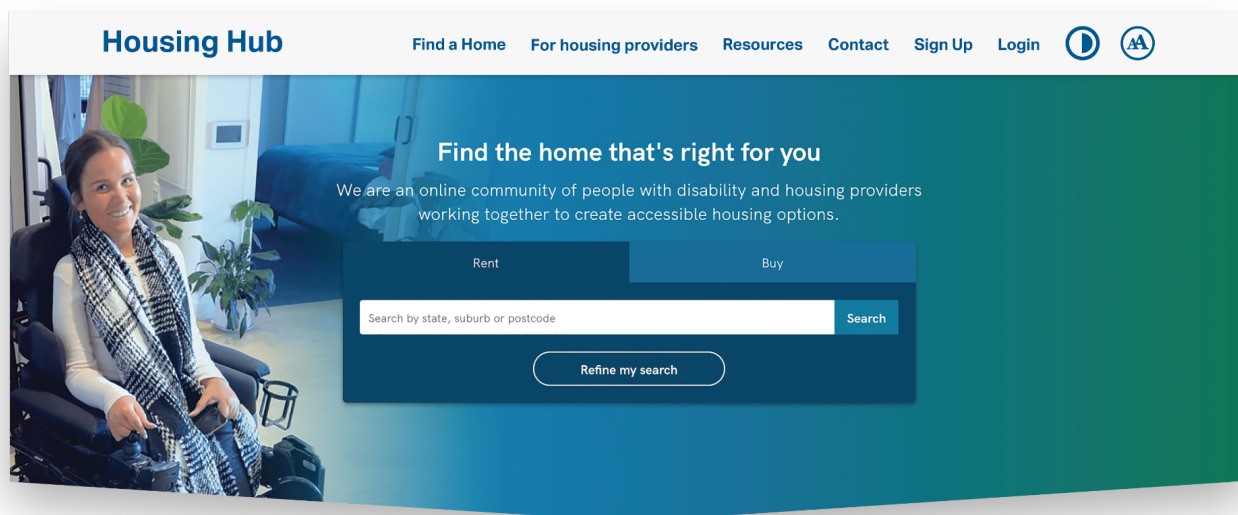
The Housing Hub and Summer Foundation sincerely thank all providers who participated in the survey. Below is a list of participants who have consented to be listed as a contributor to this survey.

1. AnglicareSA Housing Pty Ltd
2. BlueCHP Limited
3. Churches of Christ Housing Services Limited
4. Community Housing Central Australia
5. Community Housing Limited
6. Compass Housing Services
7. EACH Housing
8. Evolve Housing Ltd
9. Homes North
10. Homes Out West
11. Link Wentworth
12. Loddon Mallee Housing Services trading as Haven Home Safe
13. Metro Community Housing
14. Pacific Link Housing
15. Roseberry Qld
16. St Kilda Community Housing
17. United Housing Co-operative Ltd.
18. Uniting
19. Venture Housing Company Ltd
20. Wesley Mission

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 around 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're 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 includes a 'Suitability Score', which 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 11,200 new users and almost 82,000 page views every month – and around 700 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.

In 2017, with seed funding from the Australian Government Department of Social Services (DSS) Sector Development Fund, the first iteration of the Housing Hub was created by the Summer Foundation as a pilot project. 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 over 500 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

Ivanhoe

Rent SDA



7

Quiet home in the suburbs

Reasonable Rent Contribution as set by the NDIA

2 Bedroom

2 Bathrooms

1 Cars

House

Fully Accessible

Bedroom Only

Number of residents: 2


Posted 1 minutes ago Edited 1 minutes ago

Suitability Score

86%

My Preferences

Find a Home For housing providers Resources Contact



Zoom

Photos (7) Floorplan

Download application form

Download brochure

Print Listing

Suitability Score

86%

View score breakdown

My Preferences

Quiet home in the suburbs

Ivanhoe, VIC, 3079

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

*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

2 Bedroom

2 Bathroom

1 Car park

Bedroom Only

Available 23/04/2021

It all begins with a charming exterior, and once inside, original character details are perfectly weaved into the highly functional, single-level layout. A combination of polished floorboards, high ceilings and sash windows

[Read more](#)

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. Contact support@housinghub.org.au 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, email: support@housinghub.org.au

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>
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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 two housing demonstration projects for younger people with disability living in, or at risk of admission to, nursing homes. The first project featured two 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 1,300 housing providers listing both SDA and non-SDA properties.

The Summer Foundation is not an SDA provider or a registered NDIS provider, and does not own any SDA funded apartments.

The Housing Hub's Tenancy Matching Service currently works with three SDA providers to identify potential tenants for new SDA projects in the pipeline. Those providers are Summer Housing, Enliven Housing and Insitu Housing. So far the Tenancy Matching Service has supported over 640 NDIS participants to receive a housing offer in new SDA, including 85 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 an 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.