

**National Disability Insurance Scheme:  
An ordinary life at home**

**Spinal Cord Injuries Australia  
Policy and Advocacy Team Submission  
September 2021**

## National Disability Insurance Agency

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## Introduction

Spinal Cord Injuries Australia (**SCIA**) welcomes the opportunity to offer a submission on the National Disability Insurance Scheme's (**NDIS**) new Home and Living Policy (**H&L Policy**) to the National Disability Insurance Agency (**NDIA**). The development of the policy offers future opportunities for existing and prospective NDIS participants as well as all people with disability in Australia to secure alternative solutions to ensure that they feel safe, secure and well-connected in their homes.

## About Spinal Cord Injuries Australia

SCIA is a for-purpose organisation working for people living with spinal cord injury (SCI) and other physical disabilities. SCIA was founded by people with SCI over fifty years ago; people with disability make up over 25% of our staff, and the majority of our Board live with SCI. SCIA is a national, member-based organisation that serves 2,500 members made up of people living with disability, their family, carers, researchers, and other professionals in the sector.

SCIA's Policy and Advocacy Team provides individual and systemic advocacy, and supports self-advocacy. Our team aims to ensure that people living with SCI and other disabilities do not face barriers in exercising their independence and realising their human rights. Our team strives to achieve inclusivity and change for people with disability, their family members and carers. Individual advocates support advocacy clients across NSW, including in the Northern Rivers region.

SCIA's Community Services Team provide support coordination and plan management services to NDIS participants to support them achieve their goals, which often includes finding home and living supports and services that allow them to realise better outcomes in their daily lives.

This submission draws upon feedback from SCIA members, staff and clients on barriers to securing sustainable outcomes to meet NDIS participants' home and living goals. It is also informed by insight from SCIA's individual advocates, who provide assistance in internal reviews and Administrative Appeals Tribunal (**AAT**) appeals, and staff from the Community Services Team, who provide services to clients living in a range of housing, including group homes, specialist disability accommodation (**SDA**) and other options.

SCIA also a member of the SDA Alliance and supports the development of a diverse, well developed, sustainable SDA market, which complements a wider ecosystem of housing options for NDIS participants. SCIA also specifically supports the SDA Alliance's submission to this consultation. SCIA is also a member of the Building Better Homes Campaign and strongly supports the universal adoption and implementation of the Silver Level Standard of the Livable Housing Design Guideline in the construction of all new builds.

## Executive summary and recommendations

This submission does not directly engage with the consultation questions outlined in the NDIA's 'Consultation Paper: An Ordinary Life at Home', but rather adopts a holistic approach to identifying solutions to foster a well-developed system of supports, services and developments to improve home and living options for NDIS participants and all people with disability. The following recommendations offer a few pathways to enhance the H&L Policy's vision and ensure that the NDIA adopt a more collaborative, flexible approach to work side-by-side with participants, their families, mainstream housing service providers and others.

### **Recommendation 1:**

*The NDIA should regularly and independently consult participants to determine whether they have had genuine input and impact on the design of their NDIS plan's Home and Living goals, supports and services.*

### **Recommendation 2:**

*The NDIA should undertake a thorough research and consultation project investigating alternative models of support that presently exist or have been proposed and determine how NDIS funding could supplement supports and services in each model.*

### **Recommendation 3:**

*The NDIA should launch a national campaign to better educate service providers, NDIS participants and other stakeholders on the potential opportunities and innovation offered through Individual Living Options.*

### **Recommendation 4:**

*Participants should receive funding for targeted support coordination in their plans when a home and living goal is listed.*

### **Recommendation 5:**

*Training in home and living options should be targeted to different stakeholders and include training in understanding mainstream housing options outside of the NDIS via social and affordable housing to ensure stakeholders working directly with participants may make appropriate referrals.*

### **Recommendation 6:**

*Assertive outreach should be conducted to priority groups to ensure that all NDIS participants are informed of their home and living options and to identify scenarios in which it is appropriate to consider including a home and living goal in a participant's plan.*

### **Recommendation 7:**

*The NDIA should collaborate with other stakeholders and invest in transitional accommodation options for people with newly acquired disabilities.*

### **Recommendation 8:**

*The Minister for the NDIS should use the Disability Reform Ministers' Meetings to forward the NDIA's Home and Living Policy and work collaboratively with state and territory jurisdictions on developing a*

*greater range of options for medium and long-term social and affordable housing solutions that respond to the needs of NDIS participants not eligible for SDA or SIL.*

**Recommendation 9:**

*The NDIA should better coordinate and collaborate with state and territory housing authorities to ensure there is a transparent, operational data-sharing information system and liaison officers can provide assistance in resolving interfacing issues swiftly.*

## 1. The purpose of the NDIS's new Home and Living Policy

SCIA is excited by the prospect of the development of an NDIS H&L policy that is founded upon consultation and co-production with people with disability. The significant role of the policy and its facilitation by the NDIA will assist in fostering a well-developed housing and service delivery ecosystem across all areas in Australia that offers numerous, innovative solutions to suit the needs and goals of NDIS participants and all people with disability. It also aligns with Section 3(1)(a) of the *National Disability Insurance Act 2013* (Cth) in ensuring that the Australian Government meet its obligations to people with disability under the *United Nations Convention Rights of Persons with Disabilities* to fulfil their right to accessible housing, an adequate standard of living and independence.<sup>1</sup>

Fostering an inclusive society by promoting home and living solutions beyond segregated settings, such as group homes, is a priority that SCIA has already set out in past submissions.<sup>2</sup> SCIA is hopeful that the NDIA can take a proactive approach in developing alternatives that suit the home and living goals of individuals with NDIS plans, and offer future opportunities for all people with disability, including those not receiving NDIS supports.

This involves recognising the H&L Policy within the wider context of challenges to securing long-term accessible housing across Australia. The wider issue of a lack of affordable and social accessible housing coupled with interfacing issues and a lack of clarity on funding agreements between the NDIA and housing authorities in states and territories has resulted in a significant number of NDIS participants living in limbo, unable to secure appropriate housing or home modifications to meet their needs. To truly give effect to the aspirations of the H&L Policy the NDIA needs to recognise its wider role in collaborating with housing authorities and providers to provide better information, encourage market development, foster transparent data-sharing arrangements and ensure that no NDIS participant falls within the gaps.

## 2. The present situation and other issues

The NDIA's consultation paper provided a sound overview of many of the issues that SCIA is aware of in presenting barriers for NDIS participants to live an ordinary life at home. While the focus of this submission will be on developing future-looking solutions, it is important to recognise and elaborate on specific issues affecting home and living for people with disability.

### 2.1. The forgotten participant

While this issue was variously referenced throughout the consultation paper, a fundamental issue affecting NDIS participants' realisation of their home and living goals is the lack of consultation between them, NDIA planners and delegates and service providers in setting out the supports that best meet their needs. This issue is particularly endemic for participants receiving funding for Supported Independent Living (SIL). While the NDIA testified before the Joint Standing Committee on the NDIS in its inquiry into SIL that their operational guidelines reflect their "intent is to ensure that participants not only are more involved in the process of creating the roster of care",<sup>3</sup> time and again we have heard from SCIA members, individual advocacy clients and SCIA Community Services' clients,

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<sup>1</sup> See Articles 9(1)(a) and 28 of the *United Nations Convention on the Rights of Persons with Disabilities*.

<sup>2</sup> For example, see SCIA Policy and Advocacy Team Submission, 'Promoting Inclusion', Submission to the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, June 2021, p. 8.

<sup>3</sup> Joint Standing Committee on the NDIS, *Report into Supported Independent Living*, Commonwealth of Australia, May 2020, p. 52.

that participants have little to no genuine input in establishing their roster of care. As one advocate described, “**the participant is an afterthought**”.

As such, it is promising to see the person-centred focus envisioned in the H&L Policy through changing the conversation and expanding supports for decision-making. However, determining whether participants have had true input into the design of supports and services in their plans to achieve their home and living goals cannot be measured solely through the introduction of ‘journey maps’ and other tools to assist with decision-making. Participants, their families and carers are the true experts in the impact of their disability/ies and in defining their goals and their own assessment of the degree and impact of their input in achieving the best outcomes is the best measure of whether the NDIA is achieving its intent as set out in the H&L Policy and operational guidelines.

**Recommendation 1:** *The NDIA should regularly and independently consult participants to determine whether they have had genuine input and impact on the design of their NDIS plan’s Home and Living goals, supports and services.*

## 2.2. Service providers

The consultation paper identified the specific difficulties for participants living in ‘closed system SIL homes’, in which a single provider is both the property/tenancy manager as well as the SIL provider. This presents significant concerns about conflict of interest and participants becoming further marginalised if their housing security is compromised when they wish to make a complaint about their SIL provision.

Another issue that has arisen, particularly since the beginning of the COVID-pandemic are barriers presented when a participant’s housing provider denies on-site access to NDIS-funded service providers to deliver services within a participant’s home. Across some housing providers there exists on-the-ground confusion as to liability issues, appropriate accreditation and NDIS worker-screening checks, which are issues that may arise when services are delivered by external providers on their properties. This has left participants in a very awkward position, whereby they effectively face the prospect of losing their housing security unless they choose a service provider approved by their housing provider (in some instances this provider may be offering this service too). This undermines their choice and control in the decision-making process in determining the right providers to best facilitate their supports and services. The NDIA needs to take the lead in ensuring that service providers cooperate together, when necessary, to implement participants’ plans as agreed and outlined by participants and their support persons. The closed SIL system needs to be opened up to allow for greater participant driven flexibility that may not align with a typical SIL service provision model.

## 2.3. The housing crisis in regional areas

For many people living in regional areas across Australia, the present situation is easily characterised as a housing crisis. SCIA’s Northern Rivers Advocacy team is highly concerned by the present lack of coordination between authorities in ensuring that NDIS participants and other people with disability living in rural and regional areas have sufficient access to housing that meets their needs.

The existing stock of accessible private properties and the distinct lack of investment in new SDA in regional and rural areas, including in northern NSW, leaves many NDIS participants living in these locations with little option beyond securing social housing and potentially applying for appropriate home modifications from state and territory housing authorities. Additionally, support coordinators operating in regional and rural areas have insufficient knowledge in exploring alternative H&L options.

It results in many NDIS participants resorting to living in group homes, even when it does not align with their goals or their families' interests.

There needs to be a coordinated approach to housing in these areas, particularly with regard to coordinating a transparent, person-centred approach with mainstream housing services. This should also be a specific focus in the NDIA's development of a position statement on remote service delivery in 2021-2022, as part of its work on its Rural and Remote Strategy.<sup>4</sup>

#### 2.4. A lack of information supports

Many of the H&L Policy's themes revolve around acknowledgement of the lack of information supports that exist to ensure that NDIS participants are fully informed of the range of home and living solutions that are available and may suit their specific needs and goals. The significance of this issue cannot be understated. However, it is important to recognise that achieving the vision of the policy requires significant investment in funding, training, creating toolkits and promotional materials, fostering peer networks and adaptive, reliable information pathways.

The following case study from an SCIA member illustrates many of the issues NDIS participants encounter in finding suitable home and living solutions, particularly when encountering new stages in their lives, including moving out of the parental home for the first time.

##### Lucy<sup>5</sup>

Lucy is the mother of an adult NDIS participant, Tom, who has been living in the family home before deciding to move to a local SDA property. Lucy became aware of SDA approximately 4 years ago, however on approaching plan managers, support coordinators, NDIA staff and others, no one had any knowledge of SDA: "They wouldn't know. No, definitely not. You don't get advice - they don't live it. You don't get advice, those people aren't experienced in disability, the ones I've met...it's you that has to dig for the knowledge and have...an excellent support coordinator".

While searching for possible options for SDA via the Housing Hub website, Lucy found it very difficult to find suitable accommodation, within a desired location as the market was so limited. During a regular check of the site, Lucy discovered a new build that was suitable for Tom and "then it sort of snowballed from there". The process was longwinded and involved finding the right support persons to put in the SDA application, OTs and a specialised support coordinator: "I stumbled across this particular support coordinator who has all the knowledge in the world about every single thing. And of course, she's bombarded now...You just have to have someone with the knowledge". The application was approved within six weeks, which according to Lucy was highly uncommon. Due to the impact of COVID-19, the construction was delayed, but Tom is due to move in on completion.

Describing the process overall, the Lucy outlined: "It's a hard slog. The house is the easy part, the building is the easy part. It's getting the supports in place and actually getting the application in, it's a lot of hard work...The key is, you have to find a support coordinator who is familiar with writing housing reports...Otherwise you're set for failure!".

Lucy and Tom's story illustrates the multiple challenges to successfully securing the right home and living solution. First, Lucy had to take the initiative to instigate the SDA application process and include

<sup>4</sup> National Disability Insurance Scheme, 'Rural and Remote Strategy', 30 July 2021, <https://www.ndis.gov.au/about-us/strategies/rural-and-remote-strategy> [accessed on 5 September 2021].

<sup>5</sup> Lucy and Tom are pseudonyms.

a home and living goal in Tom's plan, seek appropriate information supports by finding a specialised support coordinator and identifying relevant property developments. We support the H&L Policy's focus on professional development of support coordinators, NDIA planners, Local Area Coordinators (LACs) and Community Connectors, however this should be bolstered by targeted H&L support coordination funding that becomes an integral aspect of the exploratory and design phase of identifying and achieving appropriate solutions. This will be further discussed in Section 3.2.

### **3. Alternative solutions**

This section will explore and make recommendations for other solutions that could assist in addressing many of the issues identified in the consultation paper. These include consideration of alternatives in home and living solutions, improving the ecosystem of information supports, exploring transitional accommodation options and re-defining the role of the NDIA and Minister of the NDIS in collaborating with a whole-of-government approach to housing reform across Australia to improve outcomes for all people with accessibility needs in the home.

#### **3.1. Better understanding participants' model of supports**

There needs to be greater investment in considering innovative home and living solutions for NDIS participants living across Australia and greater flexibility in thinking what will work for different participants and their families.

Individual Living Options (ILOs) present an exciting opportunity for NDIS participants to consider alternatives to the typical housing arrangements on offer. However, it is also evident that there is very little knowledge among participants and stakeholders in the disability sector outside of Western Australia about the potential for ILOs. While the NDIA have recently held information sessions on ILOs, there needs to be a far wider ranging coordinated effort to familiarise people outside of Western Australia about their application to NDIS participants living in other states and territories. Additionally, there needs to be greater market stewardship from the NDIA in encouraging service providers to consider establishing ILOs within their service models.

Additionally, the NDIA needs to canvas alternative home and living solutions and the reasons why existing participants opt for certain models of supports over others. For some participants, they have indicated that what they truly seek is peace of mind, knowing that support is on hand when needed. As such, home and living solutions need to integrate greater consideration of core funding for on-call overnight services as a necessary service that may allow a greater number of participants to consider living independently if they wish. This is a model that provides access to a local support worker or nurse who is available overnight to assist someone in their home with any ADL supports they might need. Participants are charged a daily overnight monitoring fee to access the service and are then charged for any callouts. It is a service model that is already in operation and provides peace of mind for participants who live by themselves in the community knowing they have access to overnight backup support if needed. It's a much more cost-effective model than what is provided currently through other overnight accommodation support and can be offered to a larger number of people within a defined geographical area.

Additionally, reform of SIL should consider greater investment in concierge models of SIL and how they may achieve different outcomes to 'traditional' models of SIL supports that better suit participants' choice and control. Further, the NDIA should consider other arrangements such as self-initiated cooperative arrangements between participants or a group of people with disability living in a similar local area, utilising shared services.



**Recommendation 2:** *The NDIA should undertake a thorough research and consultation project investigating alternative models of support that presently exist or have been proposed and determine how NDIS funding could supplement supports and services in each model.*

**Recommendation 3:** *The NDIA should launch a national campaign to better educate service providers, NDIS participants and other stakeholders on the potential opportunities and innovation offered through Individual Living Options.*

### 3.2. Sharing knowledge, promoting information supports and assertive outreach

As Lucy and Tom's story illustrated above in Section 2.4, information has often proven to be the difference between securing successful home and living solutions or not. It is not surprising that most of the consultation paper's questions centre on information, referral pathways and developing peer support networks as this area needs significant investment.

Support coordinators play a significant role in participants and their families' lives and how well they are able to maximise their funding to get the right supports in place. They are often trusted individuals and a first point of contact for participants if they encounter difficulties. As such, when a participant identifies a home and living goal in their plan, it is paramount that they feel personally supported to investigate their range of options and have specialist, relevant knowledge behind them that specifically informs their decision-making and application processes. This is particularly important when a participant does not have access to communication channels such as the internet due to their level of computer literacy or due to their geographical location. As such, targeted support coordination ensures that people receive consistent, relevant information and assistance and do not have to rely on a referral that may not be relevant to their circumstances. Having a person to communicate with provides reassurance, who has the right training, experience and knowledge to assist in their housing journey is critical when securing a home and living solution that best suits their needs as well as the needs of their informal support persons. In many cases, information packages and materials on the range of options available are simply not enough.

Further to need for funding for targeted support coordination, there is a very great need for better training across all NDIS stakeholders in the range of home and living options available to NDIS participants and to people with accessibility needs who may not be eligible for an NDIS plan. This theme was identified in the H&L Policy, however its significance cannot be understated. Training of all stakeholders is vital as having the right information early on in a person's housing journey is crucial. This should involve both mandatory and voluntary public training sessions targeted to Local Area Coordinators, support coordinators (general and specialised), NDIA Planners, Community Connectors, leaders in peer networks, disability advocacy organisations and others. It also includes training stakeholders in understanding mainstream housing services so that they may make the appropriate relevant referrals when necessary. Streamlining training programs will also ensure consistency of information delivered to participants.

Assertive outreach to specific groups to learn more about the range of available home and living options should also be a priority for the NDIA moving forward. These groups include, among others, people making major transitions (including from hospital back home or following release from a custodial setting); participants who may be affected by domestic violence; some First Nations participants; some participants from a culturally and linguistically diverse background; young people on the school to work pathway; and participants with low computer literacy.

**Recommendation 4:** Participants should receive funding for targeted support coordination in their plans when a home and living goal is listed.

**Recommendation 5:** Training in home and living options should be targeted to different stakeholders and include training in understanding mainstream housing options outside of the NDIS via social and affordable housing to ensure stakeholders working directly with participants may make appropriate referrals.

**Recommendation 6:** Assertive outreach should be conducted to priority groups to ensure that all NDIS participants are informed of their home and living options and to identify scenarios in which it is appropriate to consider including a home and living goal in a participant's plan.

### 3.3. Transitional accommodation

One area that has not been directly addressed by the H&L Policy is the transitional housing pathway for many NDIS participants anticipating discharge or release from institutional settings, such as hospital, aged care facilities or custodial settings.

For those with an acquired disability presently in hospital or in rehabilitation centres, it is very difficult to find the most appropriate home and living situations for participants and their families. Their needs may evolve over time as they adjust to new developments in their life, including integrating assistive technology into their daily routine or determining which home modifications are most appropriate for them. As such, there needs to be investment in transitional accommodation settings that may initially be offered as a product-based service. These settings would integrate 'trailing' home and living solutions and offer different assistive technology or models of support. These type of accommodation settings could also offer opportunities for informal support persons to train in the use of assistive technology or in caring routines if they wish to live and provide support in the home to their family member or friend in the future. This could be integrated into the exploratory and design phase of participants' individual plans as a fixed support to determine the best home and living option to meet the participant and their families' needs in the long-term, without having to make continual changes to plans.

#### 3.3.1. Medium term accommodation alternatives

As already discussed, there currently exists a severe shortage of appropriate housing or accommodation options for people with disability of any time duration – short-term, medium term and long-term. What is available comes from a disparate group of stakeholders, both private and public, crossing state and federal government agencies; all with differing eligibility criteria. Of itself, it is an incredibly difficult space to navigate for anyone in search of accessible accommodation.

Each year a not insignificant number people are traumatically injured with a spinal cord injury or acquired brain injury (sometimes both) requiring months of hospitalisation and rehabilitation. The majority of which will then be living with a significant disability for the rest of their lives. The majority of this cohort may not be able to return to their place of residence prior to their injury primarily because they now require accommodation built for level access and mobility impairment.

At this point in someone's life, after completing months of hospitalisation, they may be ready for discharge from hospital. Some may be eligible for the NDIS – dependent on age and functional severity. Some may be eligible for My Aged Care. Some will not be eligible for any formal funding supports. It is at this juncture where the difficulties lie in finding suitable pathways out of a hospital setting living with a newly acquired disability.

In terms of accommodation options, what is currently available for this cohort is very limited. There may be a small percentage able to return home after undergoing housing modifications to their home. But there will be a delay of potentially months before that is possible. For those eligible for the NDIS, there may be a possibility of eligibility to specialist SDA noting that it is only open to those with very significant functional impairment – 6.5% of all NDIS participants.

Legacy group homes provide SIL accommodation and care support with funding through the NDIS but it is only available to those needing 24-hour support. Also, this option is limited by vacancies that may exist, where the group home is located, and with little choice in who you live with.

Under the NDIS, there is also the possibility of access to medium-term accommodation (**MTA**). MTA as a funding source is limited to 90 days and to be eligible the participant must have evidence that they have a long-term housing solution they can move into at the conclusion of the 90 days, such as a tenancy agreement or evidence of approved modifications to the home or rental property, including an estimated date for completion.

Outside of the above funding sources, options for housing and accommodation are limited if you are in a position to be discharged from hospital or rehabilitation. For those with a need, who cannot return to their original place of residence, and that do not fit within the categories above there will almost certainly be an extended stay in hospital.

Options for social and community housing have very long waiting lists extending into years even if you receive priority status as someone with a disability. Even when people do receive priority status and become eligible for other subsidies, such as the Private Rental Subsidy in NSW, they encounter the same difficulties finding appropriate housing in the private rental market.

These issues are not new. They have existed for a long period of time even prior to the start of the NDIS. There is no one solution to fix the current crisis in providing suitable disability accommodation of any time duration.

One option is to look at what can be done to provide temporary or transitional accommodation that is flexible and will cater to the needs of people who are newly injured and in desperate need of being discharged from hospital for a time-limited duration.

If we look at what is available currently on the private rental market, the onus is on the individual to seek out accommodation that may fit their needs. They would then have to negotiate with the landlord to make any modifications needed in order to secure accommodation – be that short term or long-term. It is a very slow process and not well suited to someone discharging from hospital and coming to terms with life with a newly acquired disability.

The NDIS, with support and collaboration from other stakeholders including state and territory governments, could play an important role here in filling a gap that exists. As it stands, no stakeholder – government or NGO – provides purpose built temporary or transitional accommodation that could be utilised by someone newly injured. There is an absolute need for it. It would provide a pathway out of hospital in the short term, freeing up beds in specialised units for newly acute patients. It would give a degree of comfort to someone at a time when they are re-integrating into community life with a disability; it would be a pathway that provides a natural progression to more stable long-term options.

**Recommendation 7:** *The NDIA should collaborate with other stakeholders and invest in transitional accommodation options for people with newly acquired disabilities.*

### 3.4. Interfacing challenges and the role of the NDIA and Minister for the NDIS

While multiple stakeholders are involved in the development of home and living options for people living with disability in Australia, including those not receiving individual NDIS packages, the NDIA can take a leading role in facilitating dialogue between stakeholders and fostering a well-developed housing ecosystem to benefit all people with disability. In their role as market steward of the NDIS, and as custodian of a pillar of Australia's disability policy under the NDIS Act, the NDIA can have a significant role as facilitator in this process.

It was recently acknowledged by the Minister of the NDIS, the Honourable Linda Reynolds, that there have been “negative consequences [due to] the lack of state and territory provision for what the Productivity Commission called Tier 2. Or what [she refers to] as community-based support. Tier 2 was intended to provide people with or affected by a disability - who are not eligible to receive NDIS funded support - with information and referral services”.<sup>6</sup> Encouraging the development of community based support and accessible social and affordable housing is not the sole responsibility of state and territory governments. These systems of support and housing options also have a significant impact on NDIS participants and their families and the Minister for the NDIS and the NDIA should have a significant role in further developing these areas. This could be achieved via forwarding a reform agenda at the Disability Reform Ministers' Meetings. As part of these discussions, other developments that may impact home and living options for all people with disability, inside and outside the NDIS, such as the adoption of the Silver Level Standard of the Livable Housing Design Guideline by different state and territory governments, could also be further discussed.

The former Council of Australian Governments has agreed principles through which to determine funding responsibility for home and living solutions.<sup>7</sup> However, we know, after listening to advocacy clients' stories, this agreement has not necessarily been followed in practice. It also leaves a lot of doubt as gaps still exist in determining ultimate funding responsibility in multiple scenarios. As such, participants are caught between the NDIA and other agencies refusing to fund much needed supports and services for their home and living, with each citing ultimate funding responsibility resting with the other agency. This debate has led to numerous unnecessary internal reviews and appeals to the Administrative Appeals Tribunal. Whenever there is any doubt whatsoever about funding responsibility, delegates from the NDIA and the other relevant agencies should collaborate with the participant to find an interim solution, before clarifying a sustainable pathway forward. This requires a robust, transparent, information sharing system between agencies and liaison officers to respond quickly and flexibly in scenarios where a participants' housing situation may change rapidly due to unforeseen circumstances. Additionally, it would be very useful to keep an updated internal register of accessible property listings that could be shared between agencies to identify suitable properties for NDIS participants to consider.

**Recommendation 8:** *The Minister for the NDIS should use the Disability Reform Ministers' Meetings to forward the NDIS's Home and Living Policy and work collaboratively with state and territory jurisdictions on developing a greater range of options for medium and long-term social and affordable housing solutions that respond to the needs of NDIS participants not eligible for SDA or SIL.*

<sup>6</sup> Senator the Honourable Linda Reynolds, Minister for the NDIS, 'The future of the NDIS', National Disability Conference – Where to from here, 22 July 2021.

<sup>7</sup> Council of Australian Governments, 'Principles to determine responsibilities of the NDIS and other service systems', 27 November 2015.

**Recommendation 9:** *The NDIA should better coordinate and collaborate with state and territory housing authorities to ensure there is a transparent, operational data-sharing information system and liaison officers can provide assistance in resolving interfacing issues swiftly.*

#### 4. Conclusion

The development of a new H&L Policy is a significant development for all NDIS participants and it is hoped that existing participants, their families and carers and other stakeholders in the sector will continue to be involved in the co-production and implementation of the policy. The policy's success rests on its responsiveness to the needs of individual participants and their goals and adopting flexibility in recognising that there is no 'one-size fits all' solution for every situation.

The NDIA should strive to find innovative pathways for participants and prospective participants to enjoy safe and secure housing solutions, recognising its role in fostering a well-developed housing ecosystem in collaboration with other stakeholders, including state and territory governments, other government portfolios, building industry specialists, disability service providers and others.

If the Agency requires further information or has any queries about the content of this submission, please do not hesitate to contact SCIA.

Kind regards,

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