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# Submission Template

## Improving the National Rental Affordability Scheme – Consultation Paper

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Please upload completed submissions by **5pm AEST, 21 December 2016** to [engage.dss.gov.au](http://engage.dss.gov.au)

### Instructions for completing the Submission Template

- Download and save a copy of the template to your computer.
- You **do not** need to respond to all of the questions.
- Please keep your answers concise and relevant to the topic being addressed.

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**Name of organisation:** AnglicareSA Housing Ltd

**Stakeholder Category:** Tenancy Manager , Community Housing Provider

**State/Territory:** South Australia

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## Possible areas of improvement

Refer to section 4 of the Consultation Paper for further background information in relation to the questions below.

### General reforms to the NRAS process

**Discussion Question 1)** What provisions in the NRAS Regulations could be changed/simplified in order to provide further clarity, reduce red tape and improve the overall efficiency of the Scheme?

The requirement to have independent valuations on 1<sup>st</sup>, 4<sup>th</sup> and 7<sup>th</sup> year may be removed. After the 1<sup>st</sup> year valuation, the NRAS CPI rate for the applicable city could be applied automatically to market rent once entered in system.

### Strengthening documentary requirements

**Discussion Question 2)** What documentation should approved participants be required to provide to the Department to support the information obtained in relation to:

- an allocation (such as market rent valuations); and
- lodgement of the annual Statement of Compliance (such as rents charged, household income and occupancy records)?

It would streamline submissions for compliance if a TDA was required to be submitted only if there has been a change in occupancy, or a change in circumstance for an occupancy during the NRAS year. Possibly supplying a TDA every other year or every 3 years would be an option?

If there has been no change in tenancy, then there should be no further need for signing of the Privacy Form which is attached to the TDA each year. Once signed at beginning of tenancy and uploaded, it can apply for the whole NRAS period

### Introducing discretion to correct errors

**Discussion Question 3)** Are there circumstances under which the Department should consider allocating a dwelling even when the applicant has not met all of the conditions of reservation?



**Discussion Question 4)** Under which circumstances should the Department consider issuing an incentive even when the approved participant has not met all of the conditions of allocation but issuing an incentive is still in the best interests of the Scheme?

Where the affordable rental housing is in an area earmarked for industry growth and has State Govt requirements to have incentives in place for migration to that area. eg Regional centres, low socio-economic regions

### Improved transparency for investors

**Discussion Question 5)** While there is no legal relationship between the Department and NRAS investors, how might the Department keep investors informed of the status of their dwelling and related incentive?

N/A

### Major non-compliance

**Discussion Question 6)** Under what circumstances should the Secretary consider revoking an NRAS allocation?

Only where blatant disregard of the Regulations as determined and evidenced by the housing regulator or court of law.

**Discussion Question 7)** Under what circumstances should the Secretary consider offering withdrawn/revoked allocations to other existing approved participants?

N/A

### Role of substituted dwellings

**Discussion Question 8)** What are the issues the Department should consider when determining if one dwelling can be substituted for another?

The properties should only be substituted like for like. For example, same number of bedrooms, same rental value



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### Other comments

General comments or feedback on other issues