26th June 2018

To Whom It May Concern,

#### Re: NDIS Specialist Disability Accommodation Pricing and Payments Framework Review

Ablelink is an independent provider of Support Coordination and we take the opportunity today to submit feedback of our experiences, to be considered as part of the KPMG review. At Ablelink, we are involved with a number of NDIS participants who are currently seeking SDA housing and are funded through their NDIS plans to explore housing options. Based on their support needs, current assessments and the SDA legislation, we believe most of these participants should qualify for SDA funding.

From our experiences in developing the formal ‘Housing Plans’ we have found that there is a complete lack of guidance from the NDIA as to what is required from a support coordinator when funded to explore housing options. There are no NDIA tools or templates, advice or detailed criteria to assist in developing an effective housing plan to determine SDA eligibility. As Support Coordinators, we interpret the SDA Rules and legislation to provide direction for participants to pursue the best housing solution possible, based on their suitability and preference. We coordinate assessments and reports with experienced and specialist therapists and collate all the evidence into a comprehensive housing plan to be considered by the NDIA. Despite the comprehensive work that goes into these plans and the clear suitability and eligibility of participants, we are not seeing any successful approvals of SDA for people wanting to live on their own. There is no clarity as to whether we are failing to demonstrate the best solution as described by SDA Rules, or whether it’s simply the most economical housing solution that is desired by the NDIA, i.e. group homes. The NDIS promotes choice and control and assures participants that they will receive funding for their reasonable and necessary supports, but this is not being evidenced within the SDA arena.

We currently have a participant who has SDA approved (pending quote) in their plan, but after 6 months has still not been given a classification of High Physical Support. The need for this design category has been comprehensively demonstrated and evidenced, yet the NDIA are refusing to specify the design category on her plan. This is preventing the participant from being able to move forward with their housing applications as providers will not make an offer without the full funding being confirmed.

The price guide appears to stipulate that a person with sufficient demonstrated needs will fit a category of funding. Then, under choice and control, the participant should be able to seek an appropriate SDA provider. The current processes being followed by NDIA are not reflective of this at all.

The system and processes for approving housing plans is also very unclear and not readily available to participants and providers. There is a distinct lack of knowledge by local NDIA planners about the SDA processes and they are honest in communicating this with us. As Support Coordinators, we are doing what we can to inform ourselves and the planners as best as possible.

We do not know if there are specific NDIA Delegates who are highly skilled for SDA decision-making or if there is a formal process for SDA approvals. Our experiences so far are demonstrating that the Housing plans can only be sent to the planner who was involved with the initial plan creation, regardless of their experience, knowledge of SDA or their reliability. This is a major issue for participants as their future is being handed over to these people who do not understand the requirements of this role and the process for making these highly important decisions.

As part of this review, we would ask that appropriate processes and guidelines are put in place to provide a solution to the following gaps:

* What is the process for submitting a completed housing plan? (ie who is it submitted to?)
* What is the process for considering and approving a housing plan? (ie does the sole responsibility sit with the planner? Or a delegate? Or a panel of housing experts?)
* What is the timeframe for considering an application and providing a response?
* What feedback is given in regards to a declined application? And are the reasons for the decline fair and reasonable? Can this be contested or appealed?
* If a quote for the SDA is provided within a housing plan (for those with conditional offers), will the SDA be included in the new plan rather than ‘quote required’?
* For those still seeking appropriate housing, will their approved design category for SDA be confirmed in their new plan? Participants require this information in order to know what type of housing they can be applying for.

If you require any further information or would like to discuss our submission or our experiences in any further details, please do not hesitate to call me on 0450 781 760.

Kind regards,



Jessica Stubbins

Founder & Support Coordinator