

Specialist Disability Accommodation Pricing and Payments Framework Review Submission

Parent To Parent (P2P) welcomes the opportunity to provide a submission regarding the review of the Specialist Disability Accommodation Pricing and Payments Framework (the *Framework*).

Parent to Parent is a collaborative not for profit organisation celebrating its 20th year. As an independent host provider we offer people with a disability, their families and the community, advice as well as support coordination, fund management, planning for the future and linking to services. Core to this has been our coordination and capacity building work with people with disabilities and their families through life transitions. P2P is also the State Office for Inclusion Australia.

Moving into independent living is an area of particular interest for P2P and our families. It is complicated, and one of the major milestone for any person, and is not limited to people with a disability. The *Framework* must uphold the rights of people with disability in accordance with the United Nation Convention of the Rights of People with Disability (2006) (CRPD) and underlying principles of the National Disability Insurance Scheme (NDIS), including enabling people with disability to maximise independent lifestyles and full inclusion in community.

In reference material and discussions with key stakeholders, it appears the *Framework* has not yet met its goal of stimulating specialist housing supply that delivers on outcomes for participants. This is evident by P2P members struggling to find such needed accommodation, and discussions with industry peers. An inherent lack of confidence and confusion around investment is being displayed by participants, service providers and investors inhibiting the role out and future success of the SDA initiative.

The pricing basis of the “location factor” could be considered problematic, with blanket pricing of regions not taking into account substantial variations in land prices within the region. This financial modelling for investors makes accessibility and inclusion in established areas unattractive. More affordable locations in larger green field or new housing subdivisions display a lack of necessary infrastructure re transport & community facilities and are not where participants would like to live. This is not conducive to the choice and control ideal that is being strived for by the NDIS. The pricing model means value for money is most likely to be found in fringe communities, away from the social infrastructure and regularity of services required for the cohort of people eligible for SDA.

It is our concern that uncertainty for investors / developers around the continuation of future SDA payments with pricing reviews will limit the innovation and options for people disabilities. An unstable environment in retaining tenure of a person’s home, is not the ideal situation for any person and is undignified. This uncertainty is also making the banking sector reluctance to partner with investor or individuals due to the instability of future payments or unclear funding prior to the construction of dwellings. The “build it and they will come” model is clearly not enough to encourage

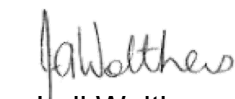
the investment in the sector. Pricing and Payments Framework can not stand in isolation of the broader SDA operational guidelines and rules. The investment financial modelling changes seen in the latest update favouring shared accommodation goes against previous indications of the 1 and 2 bedroom apartment model. Even with the attractive pricing models of the high level SDA design categories (robust & high physical support) investors are extremely reluctant to produce SDA housing to realize that high build costs for those design categories falls short of the the majority of suitable participants in that location only require Fully Accessible housing leaving the investor with a major shortfall on investment.

Investors need to be clear before proceeding they are building the right SDA Housing type for a participant prior to construction commencing. The nature of retrospective SDA approvals being conducted once a dwelling is completed is limiting. Coupled with the uncertainty of a suitable participant eligibility, there is a sense of disconnect between people and the housing options that may be available to them or restricted by poor planning. P2P are also concerned that there has been insufficient consultation with people currently identified likely to be eligible for SDA housing. The pricing and payment model may mean they have a pathway to homeownership but this may be prevented by an existing supply in available SDA in their region that a developer is unwilling to negotiate a ownership pathway.

In terms of the payment structure, we would encourage the NDIS to follow a more logical pathway to SDA eligibility, consultation with participants to encourage home ownership as a first option, and matching with an SDA provider to assist in the development of SDA dwelling to meet their needs and codesign innovation and value in the design from the outset.

Parent to Parent has submitted more detailed explanations and suggestions as part of the roundtable process. Please do not hesitate to contact P2P on 1800 777 723 if you would like to discuss further any aspects of this submission.

Yours Sincerely,



Jodi Wolthers
CEO