



NDIA Home and Living Consultation

'An Ordinary Life at Home' Submission to the National Disability Insurance Agency

Feedback and Comments from Civic Disability Services

9th September, 2021

Overview

This document has been compiled in response to the request for feedback from the National Disability Insurance Agency (NDIA) on its Home and Living Consultation paper, 'An Ordinary Life at Home', released in July 2021.

Civic is a trusted and established service provider operating in New South Wales. Founded by parents more than 60 years ago, Civic provides accommodation, employment and group supports, as well as clinical and support coordination services to more than 750 clients across Greater Sydney, predominantly supporting those with an intellectual disability. Within the home and living space, Civic provides Specialist Disability Accommodation (SDA), Supported Independent Living (SIL), Individual Living Options (ILO), aged care and drop in support services, partnering with other providers including social and community housing providers.

With a significant interest in the provision of home and living support services under the National Disability Insurance Scheme (NDIS), Civic believes it is critical to provide feedback on the development of the proposed Home and Living Policy.

In compiling this feedback, Civic has consulted with a number of home and living clients, all of whom are Participants within the Scheme. Some of this feedback is included in this document. In other instances, Civic has supported clients to provide feedback directly to the NDIA using the available online survey. Civic has also conducted a review of the paper internally and has attended an NDIA-hosted consultation webinar.

Vision

Civic agrees with and supports the overall vision of the paper, for people with disability to live ordinary lives in ordinary homes and to be included in the community. Civic, like many other service providers, strive daily towards this goal.



Impact on Established SIL Models

The tone of the paper is extremely negative towards established SIL providers and SIL models. The use of language such as 'invisible', 'impersonal', 'institutional' and 'built for convenience' in referencing this model discredits the rewarding outcomes being achieved by clients and their providers on a daily basis. The language will naturally put offside those who the Agency needs to work with, who know their clients best and who can support the NDIA and their clients in achieving the vision of the paper.

The paper references 'contemporary group homes of between 2 and 4 people'. Civic is interested to understand better the difference between a group home of four, and a group home of five that the NDIA believes makes the former 'contemporary'. Civic is also interested to understand, given the financial strains on the NDIA SIL model and pressures on funding / Scheme sustainability, how a two-to-three person model can be justified financially given the fact that costs for supports will be shared across a smaller number of individuals.

Civic Client, currently residing in a SIL environment

"I am happy at my home at the moment. I am happy because I have Rosa, Candice, Donna, Christina, Sabrina, Lyndsey, Derek and Evans. And Charles, I know he only does wake overs but I know if I need help I can come see him. I have anxiety all the time and they help me.

"I would not like to live independently right now because I am scared."

The paper also references prioritising the support of participants who live in 'institutional / group home settings with five or more residents to start looking at what an ordinary life looks like for them, within their budget.' Many of these individuals have been living with their housemates for more than 10 years, are elderly, and are supported to achieve outcomes and roles in the community of importance to them. Civic would recommend the NDIA acknowledge that this is the case in many instances.

With the recent news that Disability Services Australia (DSA) has gone into administration, NDIA will also need to consider and financially account for the impact the above strategy will have on providers with a high number of SIL model homes of five or more tenants. The above



strategy will inevitably lead to vacancies and a need for providers to restructure the viability of established models, which will risk the financial stability of many service providers. To support the NDIA in this strategy, providers will need the NDIA to address the SIL pricing issues introduced in the 19-20 Price Guide and further offer financial support to ensure the continuation of services where established five person models are disrupted. With the current SIL pricing limits, any vacancy impact, reducing a five person model to a four person model will have an untenable impact unless vacancies are absorbed, which then impacts Scheme sustainability.

Civic Client, currently residing in a SIL environment

“I often talk about what happens when I get older and what it was like when I moved between houses before. Sometimes when I’m upset I talk about moving but I don’t think I can live by myself.”

Informal Supports

The paper places an emphasis on supports provided by family and friends as well as the NDIA. The majority of our home and living clients are aged between 40 and 79, placing parental age at between 70 and 100. In many instances, families are facing their own health crises and are unable to support those they have been caring for for 40+ years. In these instances, informal supports are simply not in place. Placing an emphasis on informal support, will need to be balanced with the acceptance that these supports are not established in all instances, and that many participants will continue to rely on more formal, stable supports.

Further, the case studies and examples cited in this paper are all for individuals aged 27 or under with little to no reference to the large cohort of individuals with disability aged 40+.

Civic Client, currently residing in a SIL environment

“I would like to have more choice to have my brothers come and live with me”



An 'ordinary life'

The paper references 'flexible' home and living arrangements. Security and stability is often critical to our clients achieving their outcomes and improving quality of life and independence. Some of the 'flexible' models referred to in the paper do not appear to offer security and seem subject to frequent change, e.g. in the example host arrangement, the example cites a host family, a second back up host family, and a friendly neighbour, none of whom are related to or employed by the participant, and each of which could collapse under an informal model of support. This is at odds with the goal of the paper, to support 'an ordinary life'.

Civic Client, currently residing in a SIL environment

"I wasn't happy before and now I am. I like my home and all the things we do. Even though covid is horrible I still do lots of things and have friends. Before it wasn't like this."

Consideration for Established Systems and Processes

The paper references providers being supported to adopt the changes under the Home and Living Policy by allowing enough time for changes to be made in the market. Most 'experienced providers' have established, costly and complex systems in place that support them in navigating the current, equally complex NDIA claiming and funding submissions environment, and in rostering shifts according to documented supports. Any change to the policy that impacts the funding application and claiming process will result in extremely costly updates to systems, processes and training to staff. The statement that providers will be allowed time to adopt changes needs to be backed up with a thorough understanding of the true impact (financial, staffing, systems) of any change on providers.

SIL funding pressures and time consuming NDIA processes quashing innovation

The paper references wanting providers to offer more innovative and modern supports and accommodation for participants to start living ordinary lives. Sadly, providers' finances are stretched with a currently underfunded SIL model that does not afford many the opportunity to invest in innovation. Similarly, the bureaucracy and lengthy administrative delays inherent to the NDIA means that resource is consumed chasing payments for services provided, rather than affording time to invest in innovation and design. Finally, where providers do move to offer



innovative solutions, such as in the provision of on-site 24/7 support to those formerly living in residential aged care, the support funding is questioned and removed by the NDIA, and innovation therefore quashed. The continual bureaucracy, fighting and change leaves providers wary of pushing forward with un-funded 'innovative' services.

Civic Client, currently residing in a SIL environment

“I would like to understand NDIS more and why I sometimes don’t get what I want”

Conflict of Interest

On page 11 the paper references the lack of appropriate, affordable private market and social housing, or housing that can be modified, in reasoning why many remain in ‘closed system SIL homes’. Separating the housing and support provider (and support coordinator) will not fix the lack of appropriate and affordable housing.

The Paper goes on to reference conflict of interest when a participant chooses a support coordinator and SIL support provider from the same organisation. In our experience, many clients move their support coordination to their SIL provider following a period of trusting support. Civic would recommend the NDIA considers some allowance for those who choose to have a number of different services under the same provider.

The role of established and experienced providers in supporting Participants

Noting the omission of ‘providers’ on page 15, ‘We want you to feel supported by planners, support coordinators and Local Area Coordinators, and we will give them the information they need to build their knowledge and understanding of the choices available.’ While the NDIA is trying to emphasise the roles of S/Cs and LACs, the fact remains providers are trusted by clients and families to support them in exploration and design, in the provision of trusted supports and in supporting their achievement of their individual life goals. NDIA should acknowledge this in the future Policy and also support providers in this process.



Civic Client, currently residing in a SIL environment

“I want to live independent when I am ready. I am supported by Rosa, Luke, Candice, Derek, Bluewing and Evelyn to help me get ready.”

Exploration and Design

Civic fully supports the NDIA in its statement that all participants should be given access to exploration and design, not just those looking for ILO. Exploration and design supports providers and participants in working towards a sustainable home and living outcome.

Conclusion

Civic would like to thank the NDIA in conducting this consultation and welcomes the opportunity to provide the NDIA with feedback. Delivering safe and valued home and living supports is complex and it is crucial that all stakeholders are consulted in developing a new Home and Living Policy.

We will continue to advocate for the needs of our clients, who rely on the services we and others like us provide, and for whom we have a responsibility to not only sustain our services, but also strive to develop new, creative solutions that meet future needs. We hope that this Paper is an indication of the NDIA's intention to consult more broadly with providers as well as participants, to ensure decisions are made collaboratively, and to ensure that, when making decisions, repercussions are understood and accepted by all. Civic looks forward to working towards the vision of the Paper in partnership with the NDIA and all stakeholders.

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