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**2020 Federal Budget Submission**

Since the National Disability Insurance Scheme (NDIS) began in 2013, NDS has been providing advice on how its design and implementation could be improved. In this submission, we again provide ideas and recommendations to help deliver the world class disability support system that Australia is expecting. It is important that the many stakeholders work collaboratively in order to make this happen.

Over the course of 2019, there has been a renewed focus on increasing the proportion of people with disability in employment, particularly through the work of the NDIS Participant Employment Taskforce and the recent release of its Participant Employment Strategy[[1]](#footnote-1). This is an important step in the development of the NDIS.

Unfortunately there is much still to do. Over the period 2015 to 2018[[2]](#footnote-2), the labour force participation of people with disability was static at 53% (in 2018, it was 84% for people without a disability). One bright note was that the proportion of people with profound or severe disability working full-time in 2018 was 11.4%, up from 7.9% in 2015. Disappointingly, the number of DSP recipients reporting wage earnings also continues to decline. As of March, the number of DSP recipients reporting wage earnings was down by 1,100 (7.9%) since June 2018.

NDS acknowledges that this ongoing decline could be arrested, in part, by the NDIA’s commitment to increasing the proportion of participants in employment to 30% by 2023 (up from its current rate of 22 per cent). We support this initiative.

On a less positive note, there is much to do to deliver on other aspirations outlined in the National Disability Strategy. It is a sound document, which is due to expire next year. A new strategy to replace it must have a stronger reporting mechanism to hold all governments accountable for delivering it and be backed by sufficient funding to produce real change.

NDS’s Federal Budget submission identifies priorities for action that would:

* improve the implementation of the NDIS
* increase employment opportunities for people with disability
* drive the creation of a more inclusive society for people with disability.

**Complete the task of implementing the NDIS**

After almost six years of difficult, cumbersome and expensive implementation, full transition to the NDIS is getting closer. Unfortunately, this does not mean the issues that are problematic for participants, their families and carers, and service providers have all been resolved.

In a speech at the National Press Club in mid-November, Minister Stuart Robert spoke of the NDIS being “about 80 per cent there, with 20 per cent left to go” and outlined six priorities to help deliver the last 20 per cent:

* quicker access and quality decision making
* increased engagement and collaboration
* market innovation and improved technology
* a financially sustainable scheme
* equitable and consistent decisions
* improve long-term outcomes.

Initiatives to address these priorities will help deliver the scheme. In this submission, NDS makes recommendations on four practical actions that will make a difference, particularly to help ensure there is sufficient supply of high-quality supports to meet demand. These are:

* establish an industry fund to build and support supply
* resolve pricing problems
* create a partnership with the provider sector to focus on practical solutions
* urgently work with providers to identify short and medium-term solutions for participants living in remote and very remote areas.

1. **Address supply problems through an industry fund**

The supply of high-quality supports is failing to meet demand. NDS’s 2019 State of the Disability Sector Report[[3]](#footnote-3) indicated that in the last financial year, 62% of organisations responding to the Annual Market Survey said they were having extreme or moderate difficulty in recruiting disability support workers and 34% were having difficulty in retaining them. In regard to therapists and psychologists, the figures were 80% or higher regarding the difficulty in recruiting these allied health professionals, and approaching 50% for retaining them.

The Workforce Strategy released prior to the last Federal election had not been developed in partnership with the sector, listed a number of old initiatives and is not ‘owned’ by the sector. We need a new strategy, but it must be built upon extensive consultation with providers.

Disability service providers have substantial work to do to operate within the new regulatory framework of the NDIS Commission. The preparedness of providers for this new environment varies substantially, depending on the jurisdiction/s in which they have been operating. The systems in some jurisdictions did not require independent third party verification, had no formal process for the approval of restrictive practices and no requirement to report on their use. Implementing changes required by the new regulatory system poses significant administrative burden and cultural change costs on many providers.

One finding that will inevitably be made by the Disability Royal Commission is that the quality and safety of some supports delivered by some providers are substandard. Investment is needed in those cultural and practice changes that will deliver better and more appropriate supports for people with disability and minimise occurrence of violence, abuse, neglect and exploitation. This needs to be owned and led by the sector, working with people with disability to develop and deliver the required resources.

Market stewardship is often mentioned as a critical element in the NDIS but provider engagement is surprisingly minimal. The Agency has responsibility for this, together with the Department of Social Services. State and territory governments have an interest in this issue, as does the NDIS Commission. Providers represent the supply side of the market; their knowledge and future plans must be drawn upon to undertake market stewardship in a comprehensive manner.

A subset of the stewardship needed is to have a strong understanding of the viability of the sector and subsectors. This viability research is not currently being undertaken in a systematic way. A tool, such as the one available to some health providers, should be developed to assist small and medium providers to understand the costs associated with the supports they provide and to model alternatives (with funded assistance to do so).

NDS recommends that an industry fund of $100M be established to support three-years of industry-led initiatives to bolster the supply of high-quality supports. Decisions about the use of the fund should be made through a collaborative arrangement between the Federal Government and provider peaks.

1. **Resolve pricing problems or introduce independent price setting**

NDS’s State of the Disability Sector Report indicates that 52% of respondents are worried they won’t be able to provide NDIS supports at current prices. This is a concerning figure for a scheme that has been in place for almost 6 years. After this time, it is, in our view, reasonable to say that the Agency has failed to address some major problems in its pricing strategy.

The above results were obtained soon after the Agency announced the Temporary Transformation Payment (TTP) of an additional 7.5% being able to be charged on attendant care and community and centre-based support, decreasing by 1.5% per year. A subsequent pulse survey of providers in October indicated the proportion of providers reporting they are worried they won’t be able to provide NDIS services at current prices had risen to 76%, a considerably higher proportion than the earlier 52%. The non-inclusion of the TTP loading in plans has damaged the confidence of providers.

**Temporary Transformation Payment for Attendant Care and Community Participation supports**

From 1 July 2019, providers of attendant care and community and centre based activities have access to a higher support price limit through a Temporary Transformation Payment (TTP). The TTP is a conditional loading to assist providers with any costs associated in transitioning to the NDIS.

In 2019–20, the TTP is set at 7.5 per cent on the relevant level 1 support item and will reduce by 1.5 per cent each year thereafter.

The TTP support item number is the support base number with the addition of the letter T. These support item numbers are outlined in the NDIS Support Catalogue 2019–20, effective 1 July 2019.

Providers will need to comply with the following requirements if they wish to claim the higher TTP price limits:

* publish their service prices
* list and keep up-to-date their business contact details in the Provider Finder
* participate annually in an Agency-approved market benchmarking survey.

The TTP is similar to and replaces the Temporary Support of Overheads but is of a higher value and is in place for a longer period.

***The TSO will be obsolete as of 1 July 2019 and providers are encouraged to adopt the higher valued TTP*** [emphasis added] and conditions for claiming.

Before claiming the TTP price limit, providers and participants must discuss and agree to any proposed changes.[[4]](#footnote-4)

All existing participant plans were indexed by the NDIA on the assumption that all registered providers would charge at the TTP-included price caps on eligible supports.

The disability sector assumed that plans developed for participants post 1 July 2019 would be funded to enable participants to purchase their NDIA-determined ‘reasonable and necessary’ supports at the TTP-included price caps. Unfortunately, this is not the case. Participant plans are funded at base prices (the TTP of 7.5 percent is not factored into the funding allocation).

As a result, and despite the NDIA encouraging providers to “adopt the higher valued TTP”, to do so requires participants to agree to purchase fewer hours of support than what has been determined as reasonable and necessary. Participants and providers should not be put in this position.

Making it more difficult for providers is the fact that some participants are being told by planners, support coordinators and plan managers to refuse to pay the TTP-included prices.

As a result, and as noted above, the proportion of providers now reporting they are worried they won’t be able to provide NDIS services at current prices sits at 76. The non-inclusion of the TTP loading in plans has clearly damaged the confidence of providers.

The TTP arrangements pose two questions. Firstly, does the legislation allow for participants to be funded at levels that do not allow them to purchase all of their eligible ‘reasonable and necessary’ supports at the price caps which the NDIA encouraged providers to charge? Secondly, is it ethical to do this? NDS does not believe participants should have to receive fewer hours of support in order for providers to charge the prices they need to in order to operate in the NDIS market at this time.

The Agency has begun consulting with the sector on prices for the next financial year with the release of an Issues Paper. Major problems need to be addressed through this process including: payment for the use of a vehicle to travel between participants; more flexibility in pricing for group supports; inadequate assumptions in the NDIS Cost Model for Disability Support Workers; and pricing for isolated locations and regional areas.

If these pricing matters are not addressed in time for the next financial year, further consideration must be given to NDIS pricing being set by an independent body. On this issue, we note that both the Productivity Commission and the Joint Standing Committee on the NDIS, in separate reports at different times, have recommended that the NDIS Quality and Safeguards Commission be given responsibility for price setting for the NDIS.

1. **Partner with providers to develop practical improvements to systems and processes**

The 2019 State of the Disability Sector Report shows there is room for improvement in relationships between the sector and governments. Only 55% of disability service providers which were operating prior to 2015 believe policy reforms are heading in the right direction. 58% of all organisations agree there are too many ‘unnecessary’ rules and regulations; and 68% do not think the NDIS system and processes are working well.

Disappointingly, only 22% agree that the NDIA has a high level of respect for disability service providers.

Provider relationships with the NDIS Commission differ by location, reflecting the state-by-state NDIS roll out. In general, responses suggest the Commission has made a good start in establishing itself as a contemporary regulator. A better picture of this relationship will emerge over time.

Providers are critical of Local Area Coordination (LAC), with only 13% of respondents agreeing they are working well.

The sector is carrying millions of dollars of debt associated with payment problems (largely associated with Supported Independent Living and Specialist Disability Accommodation). It should not have reached this level before it was seen to be a priority for resolution.

A response to this disturbing picture of dysfunction is needed. Providers do not feel their concerns about how the NDIS is operating are given sufficient attention, they are not kept informed about changes being planned or implemented, their opinions regarding priorities for action are not sought, and their ideas for solutions for problems are not encouraged.

A genuine partnership between the Agency, the NDIS Commission and providers needs to be established in order to identify and prioritise the systems and processes that need overhauling and to propose pragmatic and efficient solutions. Providers cannot be expected to continue to carry the excessive administrative burden of operating in the NDIS.

NDS sees a need to re-invigorate existing engagement between providers, the NDIA and the NDIS Commission. These arrangements should be supplemented with a group that has an operational focus and is tasked with finding pragmatic solutions to inefficient and costly systems and processes and mechanisms to implement them quickly.

1. **Work with providers to identify and implement immediate actions to improve the supply of supports to participants in remote areas**

NDS has long argued the need for different approaches to implementing the NDIS in remote communities (for both Indigenous and non-Indigenous participants). The utilisation of plans of participants living in remote communities lags well behind that of participants living in other parts of Australia. Current NDIS implementation is not working well due to factors that include:

* inadequate prices to cover the cost of delivering supports in remote and very remote communities
* small number of active service providers
* staff shortages
* the cost of travel of providers is high and not adequately covered by funding arrangements
* inconsistency in the NDIA’s approach to providing funding for transport
* limited ability to fund costs for informal supports when participants need to travel
* participants expressing their right and desire to stay on country which limits their access to supports
* the time needed to establish trusting relationships within remote communities
* staff turnover
* inadequate arrangements to deal with crises, including provider of last resort arrangements
* tension between individualized and community approaches
* cultural capacity of staff (compounded by high staff turnover)
* language barriers
* limited access to some communities during the wet season
* little new Specialist Disability Accommodation being constructed.

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| **Barriers to living a good life**[[5]](#footnote-5)  Many barriers to living a good life on the Lands for Anangu and Yarnangu relate to geographic remoteness. They included lack of infrastructure, transport and support services. Culturally responsive services require a committed, consistent workforce that is well oriented and supported. Workers need to listen, respond and act. Broader community problems – such as poverty, violence and substance misuse – also limit people’s ability to live a good life. Systemic failures result from a lack of understanding and recognition of the particular difficulties and problems experienced by Anangu and Yarnangu living on the NPY Lands. |

These problems are compounded in many areas by problems including:

* poor community infrastructure
* inadequate and overcrowded housing
* lack of accommodation for visiting staff
* inadequate and expensive transport
* shortage of income to meet basic needs.

Delivering supports in remote and very remote communities is complex, often difficult, and expensive. The NDIA’s Community Connectors Program is a welcome initiative—it needs to be well-supported by the NDIA and evaluated.

The NDIA has both a Rural and Remote Strategy and an Aboriginal and Torres Strait Islander Strategy. Both Strategies are pitched at a high level and are clearly ineffective at getting supports to participants where they live in these remote environments.

Solutions are needed now. The communiqué from the December meeting of the Disability Reform Council (DRC) indicates that some projects will be implemented to address thin markets.

NDS urges the Agency and governments to draw on the immense knowledge of providers of disability supports, together with those that provide community and/or health services, state governments and other individuals. Short-term, pragmatic approaches to getting supports to participants in remote areas need to be implemented immediately while longer-term ones are found. To make it happen, the Agency will have to adopt different systems and processes, and have greater flexibility in its approaches. Providers need to be involved in the monitoring of whether improvements are being achieved.

**Assist more people with disability with their employment goals**

As noted in the introduction of this submission, the participation rate of people with disability in the workforce remains static—at 53%. This is despite the commencement of the new Disability Employment Services (DES) contract, the continued transition of supported employment to the NDIS, and significant investment in the economic participation of people with disability through a number of Information, Linkages and Capacity Building (ILC) grants.

As of 30 June 2019, 238,327 people with disability were on the DES caseload. Of this group, only 27.4 per cent were in post-placement support. While it is heartening to see the significant increase (approximately 30 per cent) of people now connected to DES, it is concerning that the number of individuals in sustainable employment has not increased accordingly.

Supported employment has been operating under difficult conditions, waiting on arrangements for the full transition to the NDIS to be announced (notably on pricing), a decision on a new wage tool to be made, and their ongoing viability supported. Recent announcements shed some light on arrangements over coming years, with many providers continuing to be concerned about their ability to continue to employ people with disability who require significant support.

Driving greater employment of people with disability begins during school. Investment during those formative years is an essential prerequisite to driving long-term improvements to the employments outcomes of people with disability.

1. **Implement the NDIS Participant Employment Strategy**

The NDIS Participant Employment Strategy 2019-2022 needs investment to help it meet the goal of 30% of NDIS participants of working age in paid employment by mid-2023, up from the current 24%.

Of the Strategy’s five key focus areas, number one seeks an increased rate of participant employment goals and aspirations in NDIS plans. This will require investment in the training and supervision of planners and LACs to ensure they use an ‘employment first’ approach for people with disability of working age. The quality of planning is a critical influence on the outcomes for participants.

1. **Broaden eligibility for School Leaver Employment Supports (SLES) and Eligible School Leavers (ESL)**

Currently, School Leaver Employment Supports are only available to NDIS participants leaving year 12. Similarly, the Eligible School Leaver (ESL) cohort is restricted to students in their final year of school.

In order to ensure more consistent and equitable provision of supports for young people with disability, eligibility for SLES should be extended to students leaving school after years 10 and 11.

NDS recommends that eligibility for SLES and ESL be extended to all NDIS and DES participants aged 14 to 25 years. In order to recognise the additional barriers to employment for ESL participants, they should be automatically funded at level 4.

1. **Incorporate additional school to work transition supports into the NDIS**

NDS runs the Ticket to Work initiative which is designed to improve outcomes for young people with disability as they transition from school to adulthood. Ticket to Work brings together multiple stakeholders including families, educators, employment services and employers to work collaboratively. Ticket to Work:

* builds the capacity of key stakeholders
* supports sector collaboration with mainstream supports
* provides opportunities for students with disability to improve their employability

Ticket to Work networks have assisted 1,500 students with significant disability into the workforce. The Ticket to Work model is tested and its success verified. It represents a relatively simple and highly cost-effective means for significantly increasing the numbers of young Australians with disability in open employment. A recent Commonwealth inquiry into school to work transition specifically recommended that the Australian Government support the [Ticket to Work model](https://www.aph.gov.au/Parliamentary_Business/Committees/House/Employment_Education_and_Training/School_to_WorkTransition/Report).

Employment opportunities for these young people require a coordinated response with individual support, preparation and mediation of relationships with employers at a local level. The Ticket to Work model supports coordination between mainstream and disability supports and ensures reduced duplication.

NDS recommends that in order to enhance the employment opportunities of young people with disability, that:

* NDIS intermediaries are funded to provide community-based coordination, strengthening the interface between mainstream and NDIS supports to create employment opportunities for young people.
* fund a Technical Assistance Centre to:
  + champion the model
  + train and support both mainstream and disability services/support to implement evidence based practices that improve employment outcomes
  + promote innovation and best practice and develop resources
  + ensure quality and continual improvement through research, assessment, and the collection and analysis of data to ensure continuing improvements.

1. **Recalibrate the DES Risk Adjusted Funding Model**

The DES risk adjusted funding model is impeding the ability of DES providers to produce long-term positive outcomes for their participant cohort.

NDS recommends, as a matter of urgency, that the Risk Adjusted Funding Model be reviewed or ‘recalibrated’ at the 18 month mark of the current contract. This is necessary to ensure appropriate supports are available to participants that enhance their longer-term employment outcomes.

1. **Fund the updating of DES Information Technology and Cyber Security**

To be eligible to tender for future contracts service providers will need to implement an Information Security Management System (ISMS) and be accredited to ISO 27100 by August 2021. This is in addition to the National Disability Service Standards and the NDIS Quality and Safeguarding Framework.

NDS recommends that the cost of development, implementation and accreditation be subsidised by the Government in a manner similar to the current funding of the audit costs for accreditation under the National Disability Service Standards.

1. **A sector transformation fund enabling disability enterprises to expand their service support model**

Recent government NDIS employment initiatives (i.e. the Participant Employment Strategy and the proposed pricing framework) have emphasised that Disability Enterprises must broaden the types of employment supports they provide and the settings in which they provide them.

NDS recommends the government release additional funding for targeted structural adjustment funding or similar for Disability Enterprises, to assist them in introducing innovative support options and building on options which have already been developed.

1. **NDIS prices sufficient to provide support to supported employees**

The NDIA has released a pricing framework for supported employment, currently scheduled to be introduced from July 2020. The framework has received a mixed reception from the sector as there are concerns it will not cover all the costs associated with supported an employee. A new pricing framework should not result in job losses.

NDS urges the NDIA to allow the cost of the assessment of on the job support needs to be claimed by the provider. As these will generally be a one-off cost, they could be priced in a manner similar to the current Supported Employment Start-Up Fee.

In addition, NDS recommends that a mechanism to determine the shortfall in employer cost coverage due to an employee’s reduced productive output (the Productive Output Gap) be developed and paid to the provider. This is a real cost of operating a business that employs a significant proportion of supported employees.

1. **Securing the future of Disability Enterprises through increased procurement**

DSS has previously contracted NDS to deliver a range of social procurement initiatives. This funding has assisted NDS’s BuyAbility Procurement service to give Disability Enterprises opportunities to access government and commercial/ corporate purchasing with tangible benefits for people with disability working in Disability Enterprises, both social and economic.

To ensure government policy boosts employment participation of people with disability, it is imperative that Disability Enterprises remain strong and viable into the future. Government procurement is a proven way to achieve this goal.

NDS recommends that the Commonwealth Government provide ongoing support for this important procurement initiative, including by expanding the opportunities for Disability Enterprises to procure work from government departments and agencies.

1. **Subsidise the increase in supported employee wages arising from the Review of the SES Award including the superannuation contribution**

The Fair Work Commission has recently delivered a landmark decision in the Review of the Supported Employment Services Award. A new wage fixing methodology for supported employees will be implemented which considers both the value of their work and their rate of productive output, with a new, higher, minimum wage rate of $3.50. The wage rates of a significant number of supported employees will increase.

NDS recommends that a time limited wage subsidy be available to providers to cover the additional costs and that it be available on a tapered basis over a period of three years.

The SES Award’s superannuation provisions for supported employees were increased to 9.5% or $15 per week, whichever is greater (up from 3% or $6). To be implemented from October 2020, it will add to the wage costs of many Disability Enterprises.

NDS recommends that the Government fully fund the increase in superannuation contributions for supported employees in Disability Enterprises.

1. **Extend the Pensioner Work Bonus to DSP recipients**

NDS and its membership have long advocated for the introduction of a ‘social wage’ that bundles the welfare benefits and wages of employees with disability. To achieve this, some modification of the DSP income test is required to ensure that employees retain more of their wages following any increase.

A logical way to immediately increase the wage of supported employees would be to extend the pensioner work bonus to people on the DSP, which would raise the income test threshold by $150 per week. Extending the work bonus to people on the DSP would remove a disincentive to work.

**Increase the impact of the National Disability Strategy**

Progress of the review of the National Disability Strategy has been slow. The current 10-year Strategy—ending in 2020—focuses on six areas: inclusive and accessible communities; rights protection, justice and legislation; economic security; personal and community support (which includes the NDIS); learning and skills; and health and wellbeing.

Problems with the interface between the NDIS and the health system have been ameliorated by decisions of the DRC, which in June agreed that a number of disability-related health supports are to be provided through the NDIS, and that governments will implement a Hospital Discharge Delay Action Plan to promote timely discharge of NDIS participants from public hospitals.

The DRC has since agreed the funding of Justice Liaison Officers (JLOs) in each state and territory to work across justice systems. The JLOs will provide a single point of contact for workers within each state and territory justice system, providing a coordinated approach to supporting NDIS participants in youth and adult justice systems. Targeted resources and training will also be developed to improve the coordination of supports for NDIS participants interacting with the justice system.

The Minister for the NDIS has flagged his interest in resolving other problems associated with interfaces between the NDIS and mainstream services.

1. **Develop coherent frameworks to drive change**

The coming year provides the opportunity to provide coherence and renewed activity to assisting people with disability to participate as equal citizens in Australian society. A new National Disability Strategy should be the centrepiece to a unified, national approach to improving the lives of people with disability, their families and carers, and to drive the shift in attitudes about the place people with disability have in our communities.

To do this, the Strategy requires a clear performance and accountability framework to ensure all sectors understand and do their part. In 2017, the Senate Community Affairs References Committee investigated and reported on the ‘Delivery of outcomes under the National Disability Strategy 2010-2020 to build inclusive and accessible communities’[[6]](#footnote-6). NDS is particularly pleased to see a recommendation targeted at improving accountability:

*The committee recommends that specific measurable goals for implementation of the National Disability Strategy 2010–2020 are created, are routinely monitored, and data is collected and reported biannually to the Disability Reform Council, the Office of Disability Strategy (if created) and presented to parliament.*

The review of the National Arts and Disability Strategy, which interfaces with the National Disability Strategy, should be finalised as soon as possible and include a number of funded initiatives.

The review of the National Disability Agreement (NDA)—a high-level agreement that defines the roles and responsibilities of the Commonwealth and the states and territories in relation to disability services—was completed by the Productivity Commission in February. Unsurprisingly, the Commission found the NDA no longer serves its purpose, has a weak influence on policy, and its performance targets show no progress in improving the wellbeing of people with disability. It recommended that a new agreement should promote cooperation, enhance accountability, and clarify responsibilities of governments.

NDS endorses the recommendation of the Productivity Commission for a new NDA that sets out a single, strengthened national performance reporting framework, with progress towards the outcomes of the new NDA publicly disseminated via a new National Disability Report, to be tabled in Parliament every two years. A National Disability Report, tabled in Parliament, will help drive all jurisdictions to improve the access people with disability have to mainstream services. This should be implemented as a priority.

* **Commit to fully accessible education by 2020**

Children with disability require additional support in schools. NDS is pleased that the government has made progress on the implementation of a new funding formula for children with disability. As this new funding model is implemented, its impact needs to be monitored.

Additional funding, however, is only part of what is needed. The following measures should be implemented to accelerate compliance with the Disability Standards for Education by 2020:

* make adherence to the standards a mandatory part of school registration
* provide non-individualised funding to schools that is dependent on progress made towards disability action plans to ensure children with disability are welcome and supported in schools
* educate school communities about disability inclusion and benchmark inclusive education with progress on disability action plans published on the ‘my school’ website
* strengthen training for all teachers on the skills required to teach and include children with disability, and promote related professional development
* ensure specialist advice is available, such as how to modify the curriculum for a particular child, promote positive behaviour for children with disability and reduce the use of restrictive interventions
* establish joint planning between schools, families and the NDIA
* **Increase housing supply for people with disability**

The NDIS provides opportunities for substantial improvement in the quality of housing for thousands of people with disability eligible for the Scheme. Access to suitable, stable and affordable housing is critical to the wellbeing and employment of people with disability.

As part of the NDIS, Specialist Disability Accommodation (SDA) payments have started to flow. This should stimulate investment in housing for people with high and complex accommodation support needs (about 6 per cent of NDIS participants).

Many other NDIS participants will also be seeking affordable and accessible housing. NDS notes the COAG commitment in 2016 to “continuing to discuss potential reforms in this critical area, including efforts to improve housing supply and provide sustainable funding for homelessness services.” We also note the building ministers’ ongoing work on the costs and benefits of applying a minimum accessibility standard for private dwellings constructed in Australia. The introduction of such a standard is overdue.

The Commonwealth has a key role to play in encouraging the construction of affordable and accessible community housing for people with disability. Although the responsibility to address disability housing challenges is shared, the Australian Government can facilitate collaboration between all levels of governments, developers, community housing providers, disability providers, families and banks. Housing for people with disability needs to be on the agenda of all these groups.

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**National Disability Services** is the peak industry body for non-government disability services. It represents service providers across Australia in their work to deliver high-quality supports and life opportunities for people with disability. Its Australia-wide membership includes over 1000 non-government organisations which support people with all forms of disability. Its members collectively provide the full range of disability services—from accommodation support, respite and therapy to community access and employment. NDS provides information and networking opportunities to its members and policy advice to State, Territory and Federal governments.

1. <https://www.ndis.gov.au/about-us/strategies/participant-employment-strategy> [↑](#footnote-ref-1)
2. ABS, 2019, Disability, Ageing and carers, Australia: Summary of Findings 2018, viewed at <https://www.abs.gov.au/ausstats/abs@.nsf/0/C258C88A7AA5A87ECA2568A9001393E8?Opendocument> [↑](#footnote-ref-2)
3. <https://www.nds.org.au/news/state-of-the-disability-sector-report-2019-released> [↑](#footnote-ref-3)
4. Taken from the NDIS website, <https://www.ndis.gov.au/providers/price-guides-and-information/annual-price-review#temporary-transformation-payment-for-attendant-care-and-community-participation-supports> on 9 August 2019. The statement “providers are encouraged to adopt the higher valued TTP” has since been removed. [↑](#footnote-ref-4)
5. Walykumunu Nyinaratjaku: To Live a Good Life, NPYWC, p. 29 [↑](#footnote-ref-5)
6. Available at <https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Community_Affairs/AccessibleCommunities/Report>, viewed on 19 January 2018 [↑](#footnote-ref-6)