



**Community Housing**  
INDUSTRY ASSOCIATION

# Good Foundations

*Engaging with registered Community Housing Organisations (CHOs) to expand their work will effectively and efficiently deliver better housing for NDIS participants.*

A Submission to the NDIS Review

By the Community Housing Disability Network (CHDN) an initiative supported by the Community Housing Industry Association (CHIA)

July 2023

## Executive Summary

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This paper argues that engaging with registered Community Housing Organisations (CHOs) can effectively and efficiently deliver better housing for NDIS participants. The registered Community Housing sector has proven expertise in housing people with disabilities and should be further engaged to secure more and better housing for NDIS participants. The paper also discusses the background of the NDIS Review, the housing needs of people with disabilities, the role of the NHHA, federal housing initiatives, the impact of housing on support demand, and the current state of registered Community Housing Organisations. The paper concludes by highlighting the different types of housing providers for NDIS participants and their strengths and weaknesses.

How can engaging with registered Community Housing Organisations improve housing for NDIS participants?

1. Expertise in transplanting proven programs: Registered CHOs have the expertise to successfully implement and adapt proven housing programs from other jurisdictions]. This means they can bring in innovative and effective housing solutions to meet the specific needs of NDIS participants.
2. Access to government-funded housing programs: Registered CHOs often act as an entry point to all social housing programs, including those funded by the government. This means they can provide NDIS participants with access to a range of housing services and assistance.
3. Extensive experience in housing people with disabilities: Registered CHOs manage a significant number of tenancies that include at least one person with a disability]. They have extensive expertise and commitment to housing for people with disabilities, making them well-equipped to provide tailored support and accommodations.
4. Community building and inclusion: Registered CHOs prioritize community building and social inclusion.. They have programs and initiatives in place to promote the inclusion of people with disabilities in their housing communities, fostering a sense of belonging and support.
5. Favourable performance and low vacancies: Registered CHOs have a proven track record of managing housing with high approval levels, low vacancies, and infrequent turnover This means they can provide stable and secure housing options for NDIS participants.

Engaging with registered CHOs allows for the utilization of their expertise, access to government-funded programs, and their commitment to housing people with disabilities. This can lead to improved housing outcomes for NDIS participants, ensuring they have access to affordable, safe, and suitable housing options..

## Introduction

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Registered *Community Housing Organisations* (CHOs) can build on their existing provision and expertise to play a more central role in meeting the challenges of housing National Disability Insurance Scheme (NDIS) participants.

The NDIS confronts large unmet demand (with the NDIA Consultation Paper: An Ordinary Life at Home identifying<sup>1</sup> that 76,000 NDIS participants were seeking new or improved housing) and inadequate supply (including a large proportion of ageing group houses). In the face of this, five key challenges confront efforts to improve the housing system for NDIS participants:

- Unmet program targets
- Inappropriate existing stock
- Inadequate management

- Complex pathways
- Poor engagement with non-NDIS housing programs.

The Government funded and regulated Registered Community Housing sector has deep, proven expertise in establishing and sustaining the housing of people with disability, including many NDIS participants. This track record includes effectively delivering a diverse range of sustainable housing projects and complex housing assistance programs. As such, there is a strong case for the NDIS to deepen their engagement with the registered Community Housing Organisations to efficiently and effectively secure more and better housing for NDIS participants.

In this submission we have outlined the current disability housing system, provided information about the sector, explained the role it could play in the system and made recommendations for the review to consider. These include specific roles that the sector could take and broader recommendations to improve the system.

We look forward to engaging further with the review. There is also an open invitation to attend the Community Housing Disability Network to discuss the submission or housing issues more generally. Please contact [joanna.forman@communityhousing.com.au](mailto:joanna.forman@communityhousing.com.au).

## Background

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### NDIS Review

The NDIS Review is looking at the design, operations and sustainability of the NDIS. It is also considering ways to make the market and workforce more responsive, supportive and sustainable. An overarching goal of the Review is to put people with disability back at the centre of the NDIS. It aims to help restore trust, confidence and pride in the NDIS.

The Review involves two parts:

- Part 1 examines the design, operations and sustainability of the NDIS.
- Part 2 examines ways to build a more responsive, supportive and sustainable market and workforce.

In mid-2023, the NDIS Review team began gathering possible solutions to achieve better housing and living outcomes for NDIS participants. This paper seeks to contribute to that process of solution finding.

### People with Disability

The Australian Institute of Health and Welfare (AIHW) identified that there are 4.4 million people with disability in Australia, of which 1.9 million are 65 or older <sup>2</sup>. The types of disability identified were sensory and speech, intellectual, physical, psychosocial and head injury. People may have more than one disability that may impact their ability to access and sustain housing.

Accessible housing is not just needed by Australians with mobility disabilities. [It] assists people with sensory, intellectual or cognitive disabilities." (Australian Human Rights Commission 2020) <sup>3</sup>

The AIHW further identifies that people with disability between 15-64 are twice as likely to be in financial stress than those without a disability, with about 750,000 of those under 65 receiving the Disability Support Pension (DSP) <sup>4</sup>. This means that one of the main barriers to housing for people with disability is a lack of financial resources, both income and assets.

# Housing

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## Housing for People with Disability

Housing for people with disability, including NDIS participants, is complex and interlinked. This complexity is compounded as many people with disability require support. In many instances, this support is funded by the NDIS.

The housing that people with disability live in can be grouped into Specialist Disability Accommodation (SDA), Non-SDA Supported Accommodation, Social and Affordable Housing, Private Rental, At Home, and interim options. In many cases, people with disability may live in inappropriate housing, such as in Residential Aged Care (RAC), hospitals, homelessness services and prisons. Because people with disability are frequently unable to access the housing they are eligible for, they are often displaced into other, less appropriate housing options.

A larger proportion of people with disability live in housing stress at a higher rate than people without disability.

Fifty-nine per cent of survey respondents said access to affordable and accessible housing and accommodation was a major or severe issue." (National Disability Strategy Consultation Report 2019) <sup>5</sup>

11.2 per cent of Australians with disability were living in unaffordable housing compared to 7.6 per cent of people without disability." (University of Melbourne, 2019) <sup>6</sup>

Therefore, to be equitable, housing assistance priorities and targets should include a focus on people with disability.

## National Housing and Homelessness Agreement (NHHA)

Government-funded housing assistance, including for people with disability, is framed mainly through the National Housing and Homelessness Agreement (NHHA), which governs the provision of around \$1.6 billion each year to states and territories to improve Australians' access to secure and affordable housing across the housing spectrum <sup>7</sup>. Registered Community Housing Organisations deliver a range of housing services and assistance that come within this agreement, though they are not signatories and have no role in its development, delivery or review.

The Productivity Commission review of the NHHA <sup>8</sup> identifies that the objective of the NHHA was to contribute to improving access to affordable, safe and sustainable housing across the housing spectrum, including preventing and addressing homelessness and supporting social and economic participation. When the review considered NHHA's role in housing people with disability, it concluded <sup>9</sup> that the NHHA is not meeting and has not contributed to meeting the governments' requirements under Australia's Disability Strategy to increase the availability and accessibility of affordable housing for people with disability, and for people with disability to have choice and control over their housing. The Review specifically proposed <sup>10</sup> commissioning a housing Targeted Action Plan under Australia's Disability Strategy.

## Federal Housing Initiatives

The current Federal government has made a number of housing commitments which could if designed appropriately drive improvements to housing for people with disability. These include

- the development of a ten year national housing and homelessness plan consultation on which is due to start in 2024
- funding programs to support additional social and affordable rental housing. The most significant, the Housing Australia Future Fund should if passed require homes to be built to at least silver standard. However, people with disability are not separately identified as a group for which housing is targeted
- an independent advisory body - the national housing supply and affordability council. As it stands the membership does not require expertise or experience in housing for people with a disability.

## Housing Impact on Support Demand

There has been considerable work by groups such as Disability Housing Futures Group identifying that better housing reduces costs and provides better outcomes<sup>11</sup>. Other work focussed on specific housing interventions, such as home modifications, has confirmed this<sup>12</sup>. Consequently, from a NDIS system perspective, the cost and impact of housing initiatives needs to be evaluated and resourced as a component of a range of interventions, including support and transport costs, not simply as a property investment.

## Housing for NDIS Participants

The National Disability Insurance Agency (NDIA), in its Consultation Paper: An Ordinary Life at Home, promotes the aspiration that people with disability should have access to home and living opportunities that are on an equal basis to others<sup>13</sup>. It identified that, in limited circumstances, the NDIS may fund Specialist Disability Accommodation (SDA) for people with a housing need, an extreme functional impairment and high disability support needs. It also identifies that the NDIS may fund temporary accommodation, including Short Term Accommodation (STA) and Medium Term Accommodation (MTA).

The NDIS Quarterly Report for March 2023 identifies that there were 592,059 participants in the Scheme<sup>14</sup>. 22,680 of these participants were identified as being active with Specialist Disability Accommodation (SDA) supports (which includes participants with SDA funding who are not currently living in SDA)<sup>15</sup>. In addition to SDA, the NDIS funds home modifications<sup>16</sup>.

All Governments have agreed on what the NDIS is responsible for and what other government agencies or services are responsible for. These roles and responsibilities are documented in the Council of Australian Governments (COAG) Applied Principles and Tables of Services (APTOS)<sup>17</sup>.

## Registered Community Housing Organisations

Registered Community Housing Organisations are Government regulated charitable organisations that re-invest any surplus into new housing and better services. They are regularly assessed against service, governance and financial standards. This may not be the case for unregistered organisations. The National Regulatory System for Registered Community Housing (NRSCH) regulate most of Australia, while WA and Victoria maintain their own complementary regulatory systems<sup>18</sup>.

The most recent NRSCH report reveals that 312 registered Community Housing Organisations managed over 106,000 tenancies, with over 22,600 new tenancies created in the reporting year<sup>19</sup>. The Victorian Housing Registrar regulates 21,000 tenancies in 10 housing associations and 35 housing providers<sup>20</sup>.

The NRSCH also noted that registered Community Housing Organisations managed 1,849 SDA properties or approximately 32% of all 5,706 SDA dwellings in the regulated States and Territories<sup>21</sup>. Housing Assistance in Australia 2022 reported that more than 30,000 or 30% of households in accommodation

managed by Registered Community Housing Organisations included at least one person with a disability<sup>22</sup>. As such, community housing represents a large body of housing providers with extensive expertise and commitment to housing for people with disability.

Community building and inclusion is at the core of registered Community Housing Organisations. For example, it is a topic in a Good Practice Guide developed by the Victorian housing regulator citing the example of registered Community Housing Organisation's social inclusion program<sup>23</sup>.

## The Community Housing Industry Association (CHIA)

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The Community Housing Industry Association (CHIA), the federated peak body that most Registered Community Housing Organisations belong to, reported that their 100 members managed 120,000 social and affordable housing tenancies with more than 5,991 dwellings in the development pipeline<sup>24</sup>. CHIA State and Territory affiliates include CHIA NSW, CHIA Victoria, CHIA QDL, CHIA SA, CHIA NT, CHIA ACT, and Shelter Tasmania. CHIA also is working towards an agreement with Shelter WA.

More than a quarter of all households housed by registered community housing organisations include people with disability. Registered community housing organisations embrace and have a regulatory obligation to both engage with their tenants (including people with disability) and to encourage their social and economic participation.

CHIA is building on its commitment to deliver more and better housing for people with disability by facilitating the establishment of the Community Housing Disability Network (CHDN). The purpose of the CHDN is to set up a network of community housing organisations (CHOs) and other stakeholder representatives that are committed to sharing insights, experience, and expertise, in order to develop solutions / responses that will improve non-market and influence housing options for people with disability while also influencing mainstream housing practice and design<sup>25</sup>.

Members will participate in the selected project development through:

- Taking a leadership role
- Contributing expertise at the network face to face meetings and through additional feedback forums
- Assisting with consultation
- Contributing funds to commission research expertise (optional where considered necessary)
- Participating in post-project communication activities.

The operations of CHDN are currently being facilitated by KPMG on a pro bono basis.

The CHDN currently has a mixture of registered community housing organisations and other organisations with relevant expertise.

Soon after its establishment in 2023 the CHDN members identified four initial areas of work:

- **Capability - Sector Capability Resources Project** - To develop greater capability within community housing organisations (CHOs) to offer services to people with disability and support them to navigate through the system
- **Communication - Core Business Paper** - To provide a document that everyone can draw from to educate those within government and others about the role CHOs can play in housing people with disability
- **Analysis - Data Resources Project** - To collect information on people with disability, housing stock and levels of accessibility, issues they have been dealing with, management strategies and areas for learning

- **Engagement - Consultation Forums** - To engage with people with disability to inform them about the work of community housing organisations and the CHDN and seek feedback including on the initial initiatives.

## Housing Provider Types

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NDIS participants may receive housing and housing services and assistance from a diverse range of housing providers, including registered Community Housing Organisations. Each has different strengths and weaknesses. These include:

- Community housing organisations
  - Extensive experience in housing people with disability
  - Strong links to support providers
  - Proven track record in delivering housing, including with private capital
  - Subject to robust government regulatory system
  - Work across all parts of the housing system
- Specialist Disability Accommodation (SDA) Providers - Non-CHOs
  - Have access to capital at scale
  - Often have limited engagement with support providers
  - Sometimes have a poor understanding of the broader NDIS system
  - May lack knowledge of the impact of disability on housing design and operations
- Non-SDA Supported Housing Providers
  - Includes both established providers (e.g., Supported Residential Services [SRs] in Victoria) and new models (e.g., SIL Houses)
  - Offer integrated support
  - Have good access to capital
  - Have been subject to significant public and regulatory criticism<sup>26</sup>
- Disability Support Providers
  - Have a strong understanding of the support services available and provided
  - May be conflicted as a support provider
  - Often have limited experience in tenancy and property (asset) management expertise
  - Typically, have limited access to capital
- Public Housing
  - Are a large-scale provider of housing for people with disability
  - In the case of Victoria, are one of the largest owners of SDA in Australia
  - Typically hold large portfolios of older outdated stock for people with disability
  - May lack the financial and operational capacity to redevelop their portfolios
- Private Rental Owners
  - Part of a very large provision of housing for people with disability
  - A large proportion of owners have limited expertise and small portfolios of properties
  - Stock is often old and with poor accessibility
  - Often have a poor understanding and engagement with the NDIS
  - Private rental is typically managed by real estate agents who often have limited experience in housing people with disability and understanding of the support systems they utilise, including the NDIA
- Private Owners
  - Rate of home ownership is likely to be lower for NDIS participants than those without NDIS

- Mixed and shared ownership schemes are and have been used by registered community housing organisations
- The SDA program includes an owner occupant option

Optimising the mix of housing provider types resourced to assist NDIS participants is central to delivering the best housing outcomes for participants in the most efficient, effective and timely way.

## Overcoming Barriers to Housing

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Registered Community Housing organisations have a range of proven programs and functions that they can apply to address the barriers across all parts of the NDIS housing system including but extending beyond the provision of affordable and accessible housing.

### Responding to unmet program targets

Several Government initiatives that impact NDIS participants have failed to meet their projections and targets. For example:

- The Specialist Disability Accommodation (SDA) program, which is currently completing a SDA Pricing Review<sup>27</sup>, has a NDIA identified target of housing 28,000 people growing from 17,500 already housed with a previous projection<sup>28</sup>. It was projected that by 2022 25,000 would be housed by.
- NDIS Quarterly Reports<sup>29</sup> reveals that, by the end of 2022, only 22,069 participants were in an SDA dwelling or had SDA funding (with some of these participants not residing in Enrolled or In-Kind SDA dwellings).
- The Young People in Residential Aged Care (YPIRAC) Strategy<sup>30</sup> committed to no people under 45 living in Residential Aged Care by 2022. At the end of that year, NDIS Quarterly Reports<sup>31</sup> indicated 48 people under 45 remain in Residential Aged Care in 2022.

Registered Community Housing Organisations regularly deliver housing projects in partnership with private developers and investors in close consultation with people with disability and support providers.

- The Home4Life consortia, led by two registered Community Housing Organisations, BlueCHP and Home in Place, successfully delivered one of the largest tranches of SDA housing over 330 people with disability, relocating out of outmoded accommodation centres in the Hunter in NSW<sup>32</sup>.
- The Sanctuary project is being developed by Whitestone Group in partnership with community housing provider Home in Place, and disability support provider Catholic Care Broken Bay is an example of a successful collaboration between a private developer and investors with a registered community housing organisation and a support provider<sup>33</sup>.
- A range of shared and mixed equity programs have been developed and delivered by registered Community Housing Organisations including Singleton Equity Housing Program<sup>34</sup> and Housing Choices Australia's Mixed Equity Program<sup>35</sup>.

### Responding to inappropriate existing stock

Much of the existing housing occupied by people with disability is outdated or in poor condition. For example:

- Existing SDA, predominantly groups houses, has been identified as "non-contemporary" in the NDIA Home and Living Consultation Paper<sup>36</sup> and equated to "congregate living" by the NDIS



Quality Safeguard Commission in its Own Motion Inquiry into Aspects of Supported Accommodation in the NDIS <sup>37</sup>.

Registered Community Housing Organisations are leading the way in redeveloping existing group homes and developing new housing configurations.

- Housing Choices, a national registered community housing organisation, is leading the development of contemporary well-located housing for NDIS participants through its St Albans project. This property comprises seven one, two and three-bedroom apartments across three levels and includes car and bicycle parking. The ground floor dwellings are designed to meet NDIS Specialist Disability Accommodation standards. All dwellings are designed to Livable Housing Australia's Silver Level, 5 Star Green Star and 7 Star NatHERS ratings<sup>38</sup>.
- CHC, an ACT based registered community housing organisation, redeveloped an outdated legacy property to create eight new SDA townhouses for people with disability with severe physical disability in its Ash project<sup>39</sup>.

### Responding to inadequate management

Providing housing and housing services to people with disability can be complex. This complexity increases with the policy separating housing and support endorsed by the NDIA. Because registered community housing organisations have championed and pioneered the separation of housing and support over decades they have well developed systems for consultation, collaboration and co-operation. Unfortunately, many newer providers have little expertise in housing people with disability and poor collaboration with support providers increasing the risk on failure to integrate housing and support.

- Registered community housing organisations have long proven track records of managing housing with high approval levels matched with low vacancies and infrequent turnovers. The Victorian Housing Registrar reported favourable performance for community housing organisations in 2022 including an occupancy rate of 96%, outstanding rent of less than 1.9% and that 87% of long term tenancies maintained in the year<sup>40</sup>.

### Responding to complex pathways

Many people with disability, their families and carers find navigating the housing services system difficult.

- This [accommodation] is a complex part of the NDIS to navigate on an individual basis. The market is dominated by large providers, both for SIL and SDA, and there are complex arrangements for how funding arrangements work. It is likely to be a daunting, if not an almost impossible, task for people living in group homes and their supporters to navigate individually if they wish to explore new home and living arrangements. (NDIS Quality and Safeguards Commission)<sup>41</sup>

Registered Community Housing Organisations have the expertise in successfully transplanting proven programs from other jurisdictions.

- Common Ground is a housing model which adopts a permanent, supportive housing solution to end homelessness which was introduced to South Australia by Common Ground Adelaide in 2006. In 2015 Common Ground Adelaide joined forces with Housing Choices Australia, a registered community housing organisation <sup>42</sup>.

### Responding to poor engagement with non-NDIS housing programs

The array of Government funded housing programs are often complex built around public and community providers as well as homelessness and other services. However, in most States and Territories

a single integrated access mechanism is operated for both public and community housing. Registered Community Housing Organisations are typically central to the delivery Government funded housing programs. In many jurisdictions, registered Community Housing Organisations act as an entry point to all social housing.

- In Victoria, a number of Registered Community Housing Organisations deliver Initial Assessment and Planning (IAP) services which are the entry point for application to all social housing and access to homelessness Services structured around the Opening Doors Framework

## The Way Forward

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In September 2021 CHIA, in its response to the consultation on the NDIS An Ordinary Life at Home, made a series of recommendations <sup>43</sup>:

1. That the NDIA set up an appropriately constituted advisory group to oversee the collection, analysis and publication of data about housing needs
2. The NDIA and/or DSS should commission research to demonstrate the benefits (including savings on support) that would be achieved through providing suitable housing
3. The NDIA should advocate for the housing needs of NDIS participants with government departments and agencies responsible for mainstream housing,
4. The NDIA and DSS should co-ordinate an expert group to help it develop a strategic response to the non-SDA housing challenge for NDIS participants in a process that could be driven by the Disability Reform Council
5. Measures to help NDIS participants in severe housing stress should be investigated, possibly through providing a top-up payment to bridge the gap between the market rent and what an individual can afford from their disability support payment
6. That the NDIS leverage the expertise of registered Community Housing organisation to assist people with disability and their families to navigate all part of the housing system including public and community housing, private rental, home ownership and disability focussed housing programs such Specialist Disability Accommodation (SDA) (Amended 2023)<sup>1</sup>.
7. NDIA with DSS should explore the potential for development of accessible housing registers in Australia through initial piloting in one State or Territory
8. The NDIA and DSS should support the development of a community housing industry standard for disability housing that defines minimum expectations through to what constitutes excellence
9. A national research centre on contemporary housing for people with disability should be established to measure outcomes, share technology and design innovations and promote best practice
10. The NDIA should be working with the States and Territories to support the redevelopment of their SDA assets where they are no longer fit for purpose

These recommendations are endorsed again as a constructive way forward.

In addition, we recommend the following to address issues raised in this submission:

- ensure that the proposed National Housing Supply and Affordability Council currently includes expertise in and experience of housing for people with a disability. CHIA has made this recommendation in its submission to the housing legislation package<sup>44</sup>.

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<sup>1</sup> Previous no 6 “There is significant opportunity to build the capacity of individual registered community housing organisations to play a market stewardship role by facilitating access to a broad range of housing providers.”

- That as part of the National Disability Strategy, a targeted housing action plan is prepared. The action plan should be integrated with the proposed National Housing and Homeless Plan
- That tenancy and asset management of (non self-provided) SDA becomes subject to appropriate regulation, similar to that of community housing managed homes.

## Conclusion

The NDIS Housing system is facing a number of large-scale and challenging barriers. Increasing engagement with and resourcing of registered Community Housing Organisations allows the NDIS to address these barriers more effectively, efficiently and timely.

## About

*This submission was compiled by the Registered Community Housing Disability Network (CHDN), an initiative of the Community Housing Industry Association (CHIA), with resourcing from KPMG and research and production assistance from Joseph Connellan of MC Two Pty Ltd.*

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<sup>2</sup> Australian Institute of Health and Welfare. "People with Disability in Australia, Summary." Australian Institute of Health and Welfare, 2 Oct. 2020, [www.aihw.gov.au/reports/disability/people-with-disability-in-australia/contents/summary](http://www.aihw.gov.au/reports/disability/people-with-disability-in-australia/contents/summary). Accessed 28 Apr. 2023.

<sup>3</sup> The Australian Human Rights Commission Submission in Response to the National Disability Strategy: Position Paper. 30 Oct. 2020.

<sup>4</sup> "People with Disability in Australia, Income Support." People with Disability in Australia - Income and Finance, Australian Institute of Health and Welfare (AIHW), 5 July 2022, [www.aihw.gov.au/reports/disability/people-with-disability-in-australia/contents/income-and-finance/income-support](http://www.aihw.gov.au/reports/disability/people-with-disability-in-australia/contents/income-and-finance/income-support). Accessed 28 Apr. 2023.

<sup>5</sup> The Social Deck (2019) Right to opportunity: Consultation report to help shape the next national disability strategy – Full Report

<sup>6</sup> Aitken, Z. and Kavenagh, M. (12 May 2019) 'Why housing is a major public health issue for Australians with disability', Pursuit quoted in Australia's Disability Strategy 2021 – 2031

<sup>7</sup> "National Housing and Homelessness Agreement | Department of Social Services, Australian Government." [www.dss.gov.au](http://www.dss.gov.au), 28 Jan. 2022, [www.dss.gov.au/housing-support-programs-services-homelessness/national-housing-and-homelessness-agreement](http://www.dss.gov.au/housing-support-programs-services-homelessness/national-housing-and-homelessness-agreement). Accessed 27 June 2023.

<sup>8</sup> Page 48, Productivity Commission (PC). In Need of Repair: The National Housing and Homelessness Agreement Study Report. 2022.

<sup>9</sup> Finding 4.8., Productivity Commission (PC). In Need of Repair: The National Housing and Homelessness Agreement Study Report. 2022.

<sup>10</sup> Page 17, Productivity Commission (PC). In Need of Repair: The National Housing and Homelessness Agreement Study Report. 2022

<sup>11</sup> Disability Housing Futures. "Disability Housing Futures Modelling the Disability Housing Gap and Its Impact on Lifetime Support Costs." National Affordable Housing Group, Sept. 2017, [nahc.org.au/documents/DHF\\_Report\\_2\\_September\\_2017.pdf](http://nahc.org.au/documents/DHF_Report_2_September_2017.pdf).

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<sup>14</sup> Page 6. "NDIS Quarterly Report to Disability Ministers 31 March 2023." <https://www.ndis.gov.au/About-Us/Publications/Quarterly-Reports>, National Disability Insurance Agency (NDIA), 2023, [www.ndis.gov.au/media/6006/download?attachment](http://www.ndis.gov.au/media/6006/download?attachment). Accessed 26 June 2023.

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<sup>16</sup> "Home Modifications Explained | NDIS." [www.ndis.gov.au](http://www.ndis.gov.au), [www.ndis.gov.au/participants/home-and-living/home-modifications-explained](http://www.ndis.gov.au/participants/home-and-living/home-modifications-explained). Accessed 12 July 2023.

<sup>17</sup> Department of Social Service (DSS). "The Applied Principles and Tables of Support to Determine Responsibilities NDIS and Other Service | Department of Social Services, Australian Government." [www.dss.gov.au](http://www.dss.gov.au), [www.dss.gov.au/disability-and-carers-programs-services-government-international-disability-reform-ministerial-council-reports-and-publications/the-applied-principles-and-tables-of-support-to-determine-responsibilities-ndis-and-other-service](http://www.dss.gov.au/disability-and-carers-programs-services-government-international-disability-reform-ministerial-council-reports-and-publications/the-applied-principles-and-tables-of-support-to-determine-responsibilities-ndis-and-other-service). Accessed 2 May 2023.

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<sup>20</sup> Victorian Housing Registrar. "Registered Housing Agency Performance | Victorian Government." [vic.gov.au](http://vic.gov.au), 2020, [www.vic.gov.au/registered-housing-agency-performance](http://www.vic.gov.au/registered-housing-agency-performance). Accessed 16 May 2023.

<sup>21</sup> Page 10, National Regulatory System for Community Housing (NRSCH). Part 1 NRSCH Overview. Aug. 2022, [nrsch.gov.au/documents/members/key-documents/D22\\_2242628\\_\\_Part\\_1\\_-\\_NRSCH\\_Annual\\_Overview\\_2021-2022\\_FINAL\\_08092022.pdf](http://nrsch.gov.au/documents/members/key-documents/D22_2242628__Part_1_-_NRSCH_Annual_Overview_2021-2022_FINAL_08092022.pdf). Accessed 3 May 2023.

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