



Summer Foundation statement on the new Specialist Disability Accommodation Operational Guidelines

On 5 August 2022, the NDIA released new Specialist Disability Accommodation (SDA) Operational Guidelines (OG), which includes criteria for living alone with onsite shared support (OSS). These new guidelines are restrictive and will mean many people who are able to live alone and access shared onsite support will need to navigate additional hurdles to access a model of support which promotes independence and delivers value for money for participants and the NDIS. Many people who successfully use this model would not be eligible if they were to apply today under these OG.

“The example (in the SDA OG) is not accurate to the way OSS works in real life. It does not mention the communication that happens with tenants and OSS to work out what suits people.”

Hannah*, tenant and NDIS participant

Specialist Disability Accommodation Operational Guidelines, August 2022, page 12 - 13¹, which can be [viewed here](#) state:

When we consider whether shared onsite support is right for you, we'll look at your individual support needs. We'll also need to make sure:

- *you can use technology to call for assistance*
- *you need an average of at least 1.25 hours (daytime) and 1 hour (overnight) ad hoc supports, in addition to any extra rostered 1:1 hours*
- *you can usually wait up to 60 minutes for unplanned support without this becoming a risk to your safety and wellbeing*
- *you understand the risks of living alone.*

¹ Specialist Disability Accommodation Operational Guidelines, August 2022, page 11 - 13, [link](#)

The new OG significantly limits participants' choice and control to live in an arrangement of housing and support where clustered SDA is complemented by an offering of shared support. SDA determinations which enable a participant to live alone, and to access a model of shared support, should be made based on individual need, functional capacity and what is reasonable and necessary for the participant. The legislation² requires that support must be reasonable and necessary and participants then have choice over the support they wish to access with their plan funds. This new criteria is a departure from the legislated approach of choice over supports. Participants highlighted that the way these OG are written, they may deter someone considering this arrangement as they do not accurately describe the flexibility of OSS and take a paternalistic approach to risk instead of supporting participants in making their own choices.

"(If I read these OG before using OSS) I would feel very very nervous. I wouldn't think I'd be able to do it"

Sally*, tenant and NDIS participant

Any guideline which prescribes who is able to live independently and share a portion of supports, needs to enable flexibility and opportunity for individual needs. This should include:

1. Use of technology and support strategies to call for assistance
2. Flexibility in the component of funding shared, in addition to day-to-day or planned supports
3. Clarification of potential wait times for day-to-day supports that are unplanned and not emergency

The NDIA should ensure that participants have the information they need to understand the risks of living in all housing situations, no matter if that is on their own in SDA, with others in SDA or in any other public, social or private housing arrangement.

"What is missing is the triage system. If I wasn't in SDA and just looking... that would make me quite nervous if I was reading it. It doesn't state anywhere that these are prioritised dependent on need. E.g. Make a coffee vs being in pain. Emergency situations are prioritised."

Alex*, tenant and NDIS participant

² National Disability Insurance Scheme Act 2013 (Cth), [link](#)

*Names have been changed for anonymity

Recent research by the Summer Foundation has demonstrated the significant benefits of SDA with shared onsite support to tenants, providers and the NDIS. Tenants highlight the benefits of living alone with shared onsite support, including privacy, autonomy, 24/7 flexible support and more choice and control over their space and time than in other settings.³ SDA tenants report higher overall health (60%), greater community integration (73%) and on average required 2.4 hours less support per day.⁴ Research included interviews with onsite shared support providers and tenants in apartments found that wait times were typically less than 15 minutes with some up to 30 minutes and a 1-off exceptional case reported as 40 minutes.⁵

Australia is a signatory to the UN Convention on the Rights of Persons with Disabilities, which protects the rights of people with disability to “be able to live independently, to be included in the community, to choose where and with whom to live and to have access to in-home, residential and community support services” (Article 19). This is in line with the NDIS Act 2013 which commits to the principle that people with disability have the “capacity to determine their own best interests and make decisions that affect their own lives”.⁶

“If it was not for onsite shared support, I would need 24/7 1:1, and 2:1 at times. And even then, having 24/7 1:1 support would leave me at risk if a support was not to turn up to work and I couldn't find a replacement. Not only would this be detrimental to me, it would also be detrimental to the NDIS. I would be concerned that the new guidelines would exclude people like me who are perfectly suited to this model of shared support.”

Lindsay*, tenant and NDIS participant

³ Summer Foundation, 2022, On-site shared support in Specialist Disability Accommodation Discussion paper, [link](#)

⁴ Summer Foundation and LaTrobe University, 2022, The positive impact of Specialist Disability Accommodation, research summary, April, [link](#)

⁵ Winkler, D; Finis, Carolyn.; D’Cruz, Kate; Mulherin, Peter.; de Costa, Monique.; Rathbone, Alecia.; Condi, Amelia.; Douglas, Jacinta. Support in Specialist Disability Accommodation (SDA) Apartments (2022). Melbourne, Australia: Summer Foundation, [link](#)

⁶ National Disability Insurance Scheme Act 2013 (Cth), [link](#)

*Names have been changed for anonymity