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The Specialist Disability Accommodation Landscape in Queensland

DRAFT Report - April 2021

Dr Grace Bitner, Coral Gillett & Professor Michele Foster

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Glossary

ABS	Australian Bureau of Statistics
ABN	Australian Business Name
ABR	Australian Business Register
MMM	Modified Monash Model (geographical region measuring remoteness)
NDIA	National Disability Insurance Agency
NDIS	National Disability Insurance Scheme
SA4	Statistical Area 4 (geographical region defined by the Australian Bureau of Statistics)
SA3	Statistical Area 3 (geographical region defined by the Australian Bureau of Statistics)
SDA	Specialist Disability Accommodation
Service District	Geographical boundary that defines an area where the NDIA operates

Executive Summary

The introduction of the National Disability Insurance Scheme (NDIS) has significantly changed both the disability service and support sector, and disability housing landscape. Since the introduction of Specialist Disability Accommodation (SDA) funding to the scheme in July 2016, the SDA market has, and continues to, rapidly evolve and change. Unlike the service and support sector however, the SDA sector is not able to be as "…responsive to short-run changes in market dynamics" (National Disability Insurance Agency, 2020b) due factors such as relatively long lead times associated with the planning and construction process, and its fixed geographical nature - which limits its ability to meet changing geographical demand like other supports or services. For these, and other reasons, access to reliable data is a critical part of ensuring alignment between the supply and demand sides of the market.

This draft report - which captures Phase 1 of a larger research project investigating the SDA market in Queensland from a range of vantage points – was designed to provide greater clarity around the current - and where available - future SDA marketplace in Queensland. In addition to SDA supply and demand information drawn directly from recently released NDIA data, there are also insights into some key features of the SDA provider marketplace.

Provider Marketplace

Notable features of the current Queensland provider marketplace based on collection and analysis of data relating to the current provider list:

- Only 65 providers of SDA in Queensland have ever been active - which represents a mere 11% of the currently registered providers[1];
- The majority (55%) of registered providers obtained the ABN's associated with their business name after July 2013; and
- The majority of SDA registered providers (61%) operate on a 'for-profit' basis (i.e., do not have a charitable status associated with the ABN associated with their provider name).

Specialist Disability Marketplace

In responding to calls for more information surrounding the current, and future, disability accommodation marketplace, a series of custom maps and tables also provide a reliable snapshot of the current market and how it is functioning. Key findings included:

- Uneven distribution has resulted in notable lack of current and 'pipeline' investment in SDA in regional and remote parts of Queensland. Overall, identified development was confined to zones that represented less than 10% of the total geographical areas of Queensland;
- 21 of the state's total 26 Indigenous communities are located in areas identified as having no current SDA, and none identified as in the 'pipeline';
- 46% of the 80 SA3 regions in Queensland have no SDA registered in the improved liveability category and none identified as being in the 'pipeline' despite over 50 participants currently being identified as currently seeking this type of accommodation;

[1] Note the number of providers listed on the provider list that was used for this research does not match the number (604) stated in the Quarterly Report to Disability Ministers for Q2 of 2020-2021.

- 81% of 80 SA3 regions in Queensland currently have no SDA registered in the robust category with none identified as being in the 'pipeline'; and
- A market emphasis on delivering 'high physical support' and 'fully accessible' properties which - when viewed alongside the previously identified areas of lack - highlights challenges associated with ensuring adequate supply of the necessary type of accommodation in the required locations.

The emerging picture at this stage is of a market characterised by a number of clear 'mismatches' between supply and demand. The long lead times associated with the design, development, building, and approval process are a significant confounding factor at play in attempts to match supply and demand. Further, participant's ability to move residences, which is central to their ability to exercise choice and control, can change the demand profile at any time. This potential for change on the demand side, along with the significant lead times associated with the supply side, has the potential to continue to frustrate attempts to align supply and demand in the marketplace.

These early findings also raise the question as to whether the risk-reward profile in certain regional and remote areas, and within some categories, is sufficient to attract investment? The findings also mirror recent findings of the Queensland Productivity Commission which proffered that the lack of available options in some regional and remote areas of Queensland indicate that:

> While solutions should aim to support competitive market outcomes, alternative commissioning models may be necessary to facilitate the delivery of reasonable and necessary supports to participants in some areas (Queensland Productivity Commission, 2020, p. 318)

The level of market stewardship required is a further issue raised by these findings, particularly in relation to participants living in underserviced areas, and how they might be afforded access.

In responding to the findings of this initial stage - alongside other contextual information such as the recommendations outlined above by the Productivity Commission - there is an emerging case for looking at different ways to approach the complex problem of matching supply and demand. For example, the introduction of minimum accessibility standards, while not creating 'turnkey' ready SDA[2], has the potential to create tens of thousands of new dwellings a year in Queensland[3] that are more easily modifiable to suit a range of individual abilities and needs. Such a solution also has the potential to also help with issues identified here where development is concentrated in certain regions and locales, as the standard would require all new dwellings - regardless of location - to comply. Overall, given the current challenges emerging, it is clear that this is a timely juncture to begin considering a range of new ways to deal with these complex problems.

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[2] The level of accessibility afforded, and alignment with SDA required features, would depend both on the standard adopted and the type of SDA being built.

[3] This is based on Australian Bureau of Statistics building approval data for the total number of dwelling units in all new residential buildings approved in Queensland (public and private sector). Total number of approvals was 33,029 in the 2018/19 financial year, and 30,058 in 2019/20 (Australian Bureau of Statistics, 2020).

Introduction and Context

A central driver of the National Disability Insurance Scheme (NDIS) was the intent to fulfil Australia's obligations under the United Nations Convention on the Rights of Persons with Disability (CPRD) (United Nations, 2007) which, amongst other rights, predicates that:

> Persons with disabilities have the opportunity to choose their place of residence and where and with whom they live on an equal basis with others and are not obliged to live in a particular living arrangement (United Nations, 2007Article 19a)

A core component of the NDIS is the determination of individualised funding to enable choice and control of services and supports for persons with disability. In recognition of the environmental enablers required to meet personal goals and aspirations, the NDIS also currently provides funding for Specialist Disability Accommodation (SDA), that is deemed to be 'reasonable and necessary' [("National Disability Insurance Scheme (Specialist Disability Accommodation) Rules 2020," 2020; "National Disability Insurance Scheme Act ", 2013)]. Necessarily, the objectives of the NDIS rely on diverse and robust markets to fulfil these objectives (Reeders et al., 2019, p.iii).

The National Disability Insurance Agency (NDIA), an independent statutory agency established under the NDIS Act 2013, is responsible for implementation of the Scheme. The NDIA has processes in place in relation to the registration and auditing of providers registered under the scheme. Unfortunately, publicly available information for NDIS participants on providers and organisations can be limited, thereby complicating decisions about availability and choice. From the provider perspective, emerging research indicates a need for access to reliable and timely data about participants (and their needs) in order for the market to be able to respond effectively. For example, a joint submission prepared by a large group of SDA organisations into the state of the SDA market in Australia identified a distinct lack of "…useful data…" available "…to the market about the profile of demand and supply to date" (Ability SDA et al., 2018, p. 43).

In Queensland, disability accommodation service providers, and individuals with disability face unique challenges associated with "…vast distances, extreme remoteness, and areas of low population density" (Queensland Productivity Commission, 2020, p. 319). More than half of the Queensland population resides outside of the greater Brisbane metropolitan area, which is a notably greater proportion than seen elsewhere in Australia[4]. It is estimated that 14,133 NDIS participants (16.8% of the total number of participants) were based in rural and remote areas of Queensland (NDIS, 2021, p. 249). Within this, 1,444 Queensland NDIS participants were classified as residing in remote and very remote locations, 679 of whom live in very remote locations (NDIS, 2021, p. 249). Further, the recent draft report on the NDIS market in Queensland produced by the Queensland Productivity Commission, has highlighted "the proportion of participants with SDA in their plans but who are seeking a dwelling is more than double that nationally" (Queensland Productivity Commission, 2020, p. 238).

[4] https://www.qld.gov.au/about/about-queensland/statistics-facts/facts

In view of the issues outlined above, a multi-phased research project was designed with the broad intent of developing a clearer understanding of the features and functioning of the current SDA marketplace in Queensland. The overall project comprises two main phases as detailed below, with this draft report addressing phase 1 only.

- **Phase 1**
  a) An analysis of characteristics of the Specialist Disability Accommodation *provider* marketplace, using key data such as how the provider market has developed since the NDIA rollout and key market demographic features (e.g., the proportion of market registered as for- and not-for-profit and data surrounding active and inactive providers); and
  b) More detailed analysis of the SDA market in Queensland, with the aim of developing an understanding of how the market is functioning in terms of *diversity, quantity*, and *distribution* (geographical) of SDA stock. This phase used quantitative data sourced directly from the NDIA, and the Australian Bureau of Statistics (ABS), translating it into an accessible snapshot of the marketplace.

- **Phase 2**
  Phase 2 is currently in progress. It involves semi-structured interviews with a range of key stakeholders including registered providers, peak body and advocacy group representatives, and scheme participants. This will provide further context to the preceding stages and aid in the identification of challenges and opportunities for the marketplace in Queensland.

Methodology

The main study aims were to identify and document the defining features of the current SDA marketplace in Queensland and to understand how it is functioning. This includes the identification of current challenges and opportunities facing the sector. Specifically, the aims of the multi-phased study are:

Phase 1 –

a) To expand current understandings of the SDA *provider* landscape in Queensland; and
b) To improve understandings of how the SDA market in Queensland is currently functioning in terms of *diversity, quantity*, and *distribution* (geographical) of accommodation.

Phase 2 - Building on the work undertaken in Phase 1, to identify current challenges and opportunities facing the sector through consultation with a range of key stakeholders.

The following sections outline the methods and approaches employed in each phase.

Phase 1a

Data collection and screening

Queensland SDA provider lists were downloaded from the NDIA website on the 11th of February 2021 (NDIA data set current as at 31st December 2020).

Data included:

- Provider name;
- Head office location (suburb);
- Provider phone number;
- Website;
- Email address;
- Head office address; and
- Post code.

Additional data were obtained using the Australian Business Register (ABR) "Name Lookup" tool, including:

- Australian Business Number
- Name type (entity name or trading name)
- ABN status (active or cancelled)

- State; and
- Postcode[5]

The ABN lookup tool also contained a 'match' function which would identify any discrepancies between the name searched and the results return. Any match score less than 100% was manually checked in order to identify the closest match[6]. Other discrepancies such as postcodes listed in the NDIA provider list and those returned through the ABN search, along with results that had an ABN with an inactive/cancelled status were also investigated. In 18 instances a 100% match was not made using the ABN tools. In these cases, the website listed on the NDIA provider listing was checked for further information which could help identify the correct ABN. This process resulted in four providers listed on the NDIA provider list where a matching ABN was not identifiable. These four providers were excluded from the study.

Following this the "Advanced ABN Lookup" tool was used to gather the following data:

- Trading name(s) and Business name(s) (where applicable);
- Entity type (i.e., Australian Public Company, Individual/Sole Trader etc.);
- Tax concession status and Charity Type (where applicable);
- Date of ABN activation; and
- ABN status change date (where applicable).

Several registered providers listed were either duplicates (e.g., there were eight separate listings for a single provider) or were associated with multiple listings (i.e., different business / trading names but common ABN). For this reason, a final filter was undertaken to remove any listings which shared the same ABN as this had the potential to impact on the output data (i.e., having four listings for the same charitable organisation would increase the number of businesses identified as charities). In total, there were 34 duplicates identified, excluding these duplicates and the four providers which did not return a matching ABN, the original list of 630 providers was reduced to 592 different unique entities.

Data Analysis

The following information was extracted from the data:

- Year of business/trading/entity name registration;[7]
- Breakdown of providers registered in each business type; and
- Data pertaining to providers registered as charities or public benevolent institutions.

The results from this stage are discussed in phase 1a findings section.

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[5] Note: State and postcode were collected for the purposes of cross-checking with details from the NDIA provider list.

[6] 79 of the 630 providers listed did not achieve a 100% name match score. Of these 79, 43 returned a 97% match score or higher and were typically resulting from minor differences in punctuation or the use of shortened words.

[7] Where the name listed on the NDIS provider list is a trading name or business name rather than the ABN entity name, the date used for this data set is the registration date of the trading / business name, not of the original ABN.

Phase 1b

Data Collection

Data relating to the current specialist disability accommodation marketplace in Queensland were sourced from:

- The NDIS Quarterly Report to Disability Ministers for Q2 of 2020-2021 (published February 2021, with data current at 31 Dec 2020), Appendix P: Specialist Disability Accommodation, (with data identified at statistical area level SA4); and
- The "Data Downloads" section of NDIA website as referenced at the end of Appendix P (p.550) was used to obtain data at the statistical area level SA3.

Data translation and analysis

These data were analysed and translated into the tables and maps contained in findings - phase 1b section of this report. The process of translation for the maps utilised the statistical area boundaries obtained from the Australian Bureau of Statistics in ArcGIS format and importing them into vector-based graphics software for the purpose of overlaying statistical data. The analysis and findings of this process are discussed in detail in this report.

Phase 2

Phase 2, currently in progress, involves semi-structured interviews with a range of industry stakeholders including experienced registered providers, peak body and advocacy group representatives, and scheme participants. This stage will provide valuable contextual information which is intended to frame and inform the findings of the preceding stages.

Findings – Phase 1a

SDA Providers in Queensland

The NDIA outlines the intent behind SDA as being "to provide eligible participants with housing that increases their independence and maximises social and economic participation, whilst delivering value for money" (National Disability Insurance Scheme, 2019, p. 7). The information available to individuals and families regarding registered providers includes – the group/s that the provider is registered for; provider name; head office location (suburb); phone number; website; email address; head office address and postcode.

Within the Queensland registered provider list (current as at 31 December 2020) of 630 'Specialist Disability Accommodation' providers, a total of 137 (22%) list their head office location as Queensland (by postcode).

Active Providers

Data identifying which providers are currently active is not currently available publicly. The following high-level data have been provided, however, which is useful in contextualising the provider data:

Table 1: Registered providers: Specialist Disability Accommodation (QLD, as at 31 December 2020)

	Providers active in 2020-21 Q2			Cumulative number of providers that have been <u>ever</u> active	Total number of Registered providers
	Active in 2020-21 Q2 <u>*and*</u> at some point prior	Providers active <u>*for the first time*</u> in 2020-21 Q2 *(i.e., newly active providers)*	Total active in 2020-21 Q2		
Individual/ sole trader			2	3	
Company/ organisation			45	62	
Total	**36**	**11 (23% of total active)**	**47**	**65 (11% of total)**	**604[8]**
Comparison with National data:					
National				***298 (36% of total)***	***839***

Source: Quarterly Report to Disability Ministers for Q2 of 2020-2021, p281-284; p 529

Despite a total of 604 Specialist Disability Accommodation providers currently identified as registered in Queensland[8], only 65 are identified as having <u>ever</u> been active, representing 11% of the total number of providers currently registered. This is less than a third of the national average – with 34% of registered Specialist Disability Accomoodation providers having been identified as ever being active.

[8] As mentioned previously, this number differs to the number of providers on the list utilised in Phase 1a.

Businesses Registered after July 2013 (commencement of national pilot program)

The NDIS officially began national rollout in select pilot sites in July 2013. While this report is focused on the Queensland landscape, given the clear intent and timeline for eventual rollout in Queensland it is helpful to look at the proportion of providers who acquired the ABN associated with their provider name after this date. As Figure 1.4 illustrates, the majority (55%) of SDA providers registered the ABN associated with their provider name after this date.

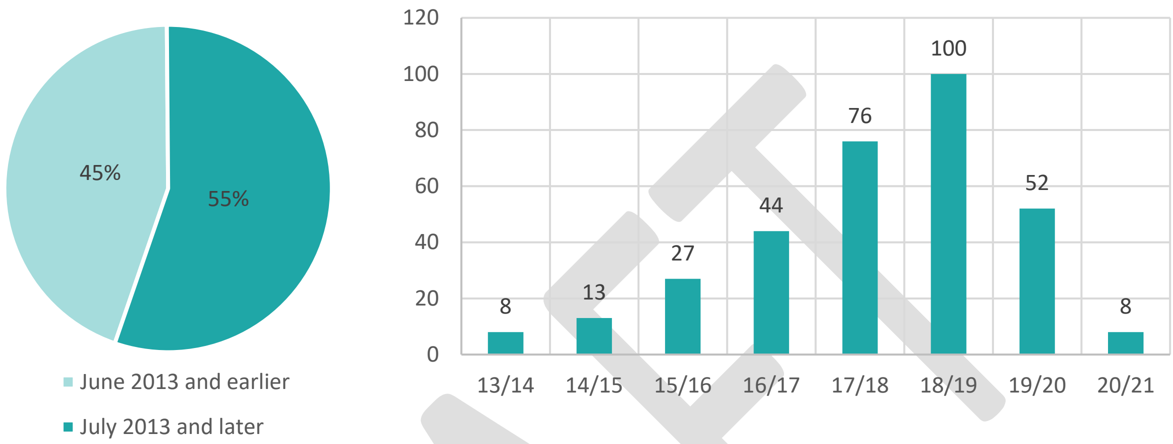

Figure 1 Qld SDA provider business by financial year ABN registered

Businesses Registered after July 2016 (commencement of Queensland rollout)

The NDIS began a progressive rollout in Queensland in selected sites in July of 2016. Funding for Specialist Disability Accommodation also was introduced at this time. Within the list of providers registered in Queensland, 280 (47% of providers) acquired the ABN associated with their provider name after 1st of July 2016, and 55% acquired the ABN associated with their provider name after 1st of July 2013.

Market Analysis

Figure 2 below summarises the business type distribution of the current[9] Queensland Specialist Disability Accommodation registered providers. As mentioned previously, these statistics encompass listed registered providers, 89% of whom have reportedly never been active in providing Specialist Disability Accommodation under the NDIS. Key points include:

- The majority of the SDA provider market (61%) operates as 'for-profit' (i.e., does not have a charitable status associated with the ABN associated with their provider name);
- Australian private companies represent 42.2% of the market;
- Australian public companies represent 23% of the market;
- Other entities represent 17.4% of the market;

[9] Based on the QLD registered provider list available on the NDIA website (current as at 31 December 2020); ABN search data related to these registered providers conducted during March 2021; and data provided as appendices to the NDIS Quarterly Report to Disability Ministers for Q2 of 2020-2021 (published February 2021, with data current at 31 Dec 2020).

- Individual / Sole traders represent 6.6% of the market;
- Trusts represent 8.1% of the market;
- Government entities represent 1% of the market; and
- Partnerships represent 1.7% of the market.

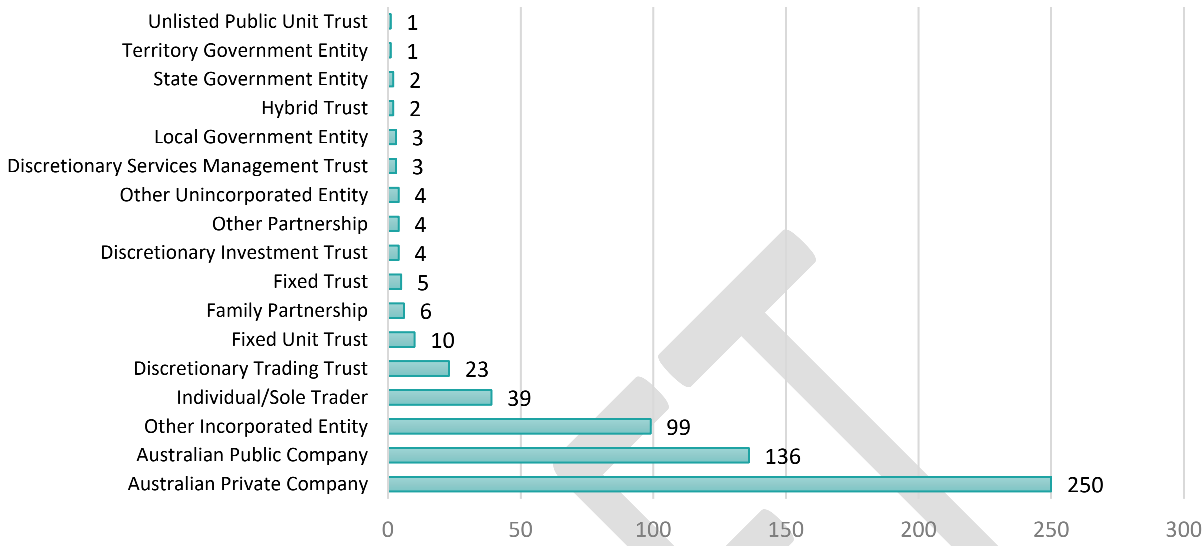

Figure 2 Qld SDA providers by type of business entity listed in ABR

Figure 3 below summarises the proportion of the market that have a charitable status associated with their ABN.

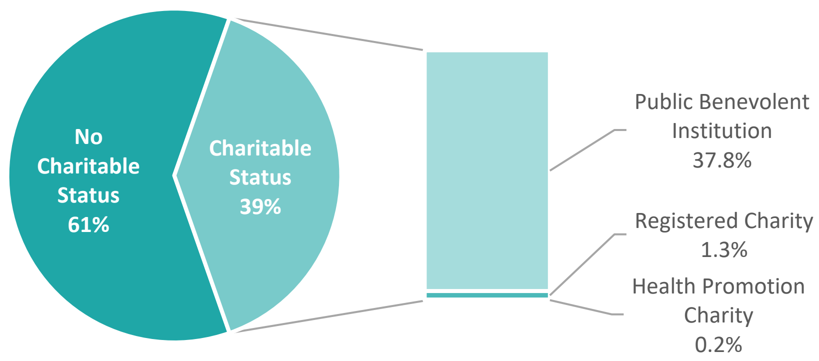

Figure 3 Qld SDA providers by charitable status

Phase 1a: Data Limitations

The following limitations apply to data presented here:

- **Provider active status unknown:** As only 11% of current providers have ever been active, the data here only reflects the market makeup of those companies who at one stage had intent to operate in the marketplace. As such, identification of the providers who have *ever been active* in the market would facilitate a more comprehensive understanding of the market.
- **Complex business structures:** These data do not necessarily fully capture certain market complexities, such as large businesses with multiple arms.

Findings – Phase 1b

SDA Market Overview

Prior to September 2020 (NDIS, 2020), the Specialist Disability Accommodation Data publicly released by the NDIA was limited to the Statistical Area 4 (SA4) level. In September of 2020, the NDIA began releasing SDA data at the Statistical Area 3 (SA3) level. Following this, updated and expanded data sets were released at the beginning of 2021, based on data extracted on the 31st of December 2020 (NDIS, 2021). The shift from SA4 to SA3 level was significant in the Queensland context as certain single SA4 regions such as, 'Queensland Outback' (315) are as large as 118,318,272 hectares, which represents 68%[10] of the total Queensland land mass.

This section of the report presents the translation of key aspects of the data into maps and custom tables to provide an easily accessible snapshot of the key feature of the SDA landscape in Queensland.

Specifically, the following report section:

- Maps the quantity and distribution of currently enrolled SDA dwellings;
- Maps the quantity and distribution of participants identified by the NDIA as currently seeking SDA;
- Maps the quantity and distribution of unfinished (unenrolled) new build SDA; and
- Overlays the identified areas of need against the current dwellings in progress to identify areas of potential under- and over-supply.

[10] Data from the Australian Bureau of Statistics, accessed via: https://itt.abs.gov.au/itt/r.jsp?RegionSummary&region=315&dataset=ABS_REGIONAL_ASGS2016&geoconcept=ASGS_2016&measure=MEASURE&datasetASGS=ABS_REGIONAL_ASGS2016&datasetLGA=ABS_REGIONAL_LGA2019&regionLGA=LGA_2019&regionASGS=ASGS_2016

Key Maps

The following key maps show the Queensland Statistical Area (SA) geographic boundaries. Black outlines indicate the borders of Statistical Area 4 (SA4), and green lines indicate Statistical Area 3 (SA3) boundaries.

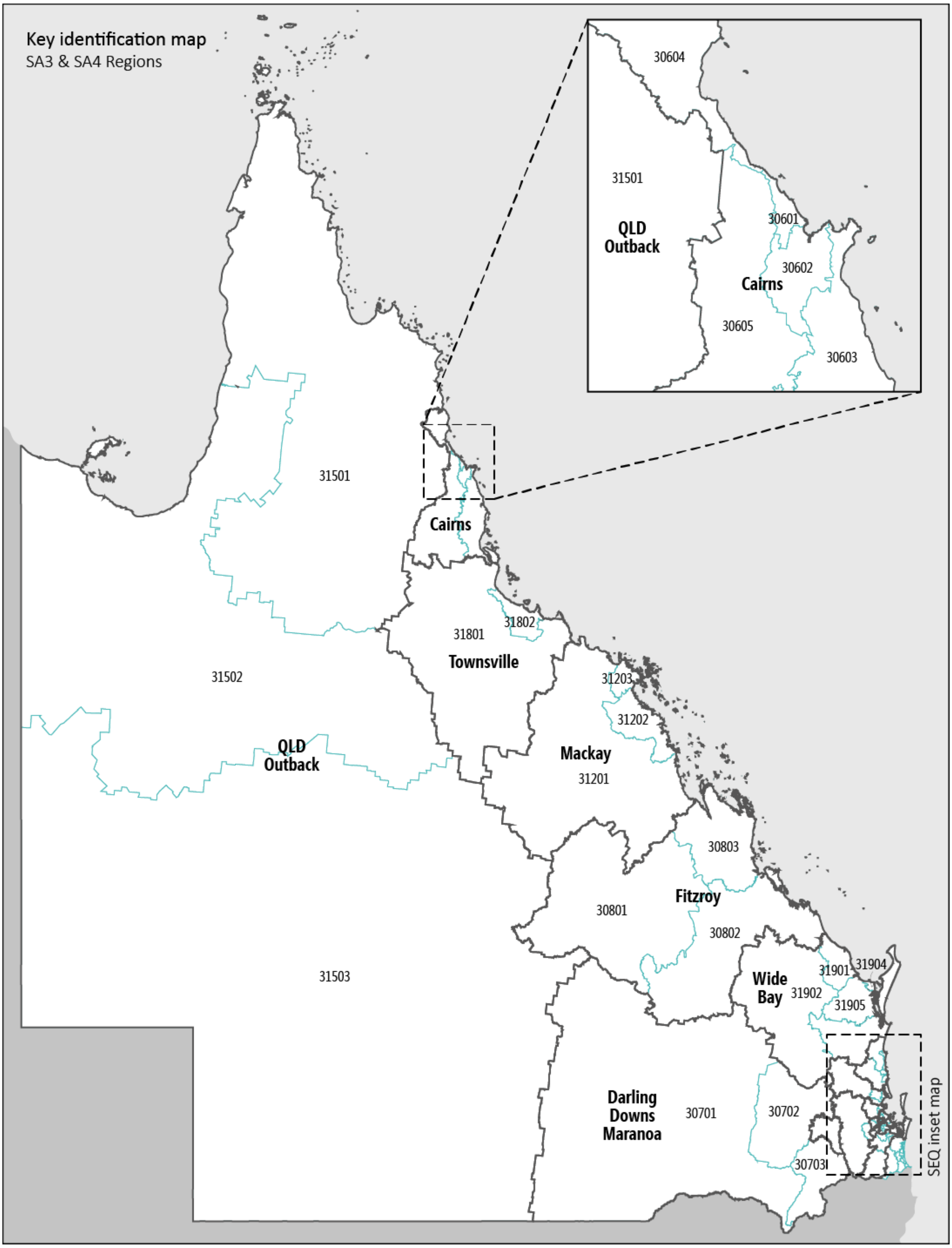

Figure 4 Queensland SA3 and SA4 region boundaries

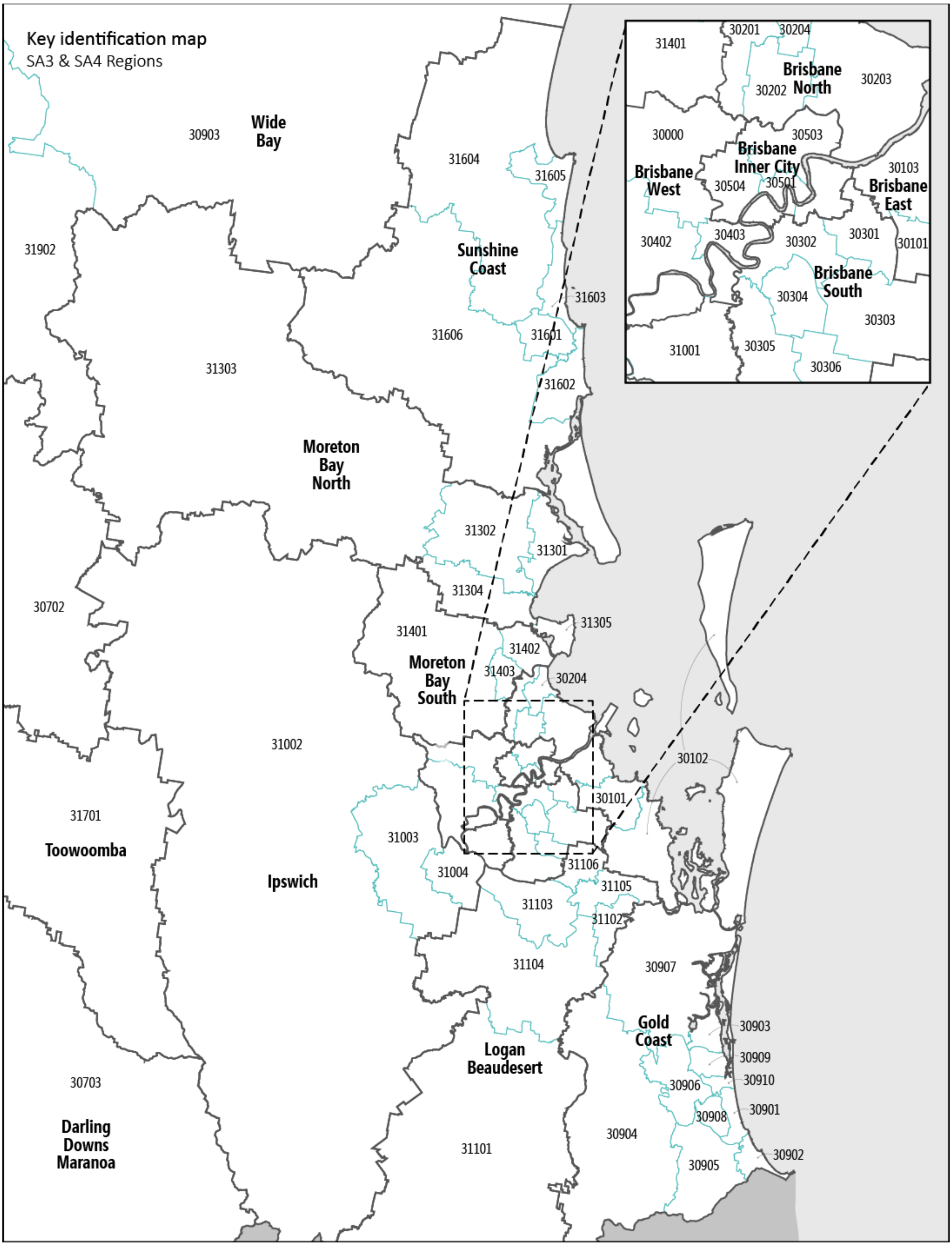

Figure 5 South East Queensland SA3 and SA4 region boundaries

Mapping Regions and Service District Overlap

While the NDIA Specialist Disability Accommodation data used in this report are categorised according to Statistical Areas SA3 & SA4, other data made available by the NDIA (National Disability Insurance Advisory, 2020) are categorised according to service district [for example through the ‘data and insights’ (National Disability Insurance Agency, 2020a) page and the ‘explore data’ tool (National Disability Insurance Advisory, 2020)] – this difference limits the usefulness of some of the data and comparative potential.

The map below illustrates the differences between the Australian Bureau of Statistics Statistical Areas (shaded regions) and the NDIA Service Districts (regions outlined in red).

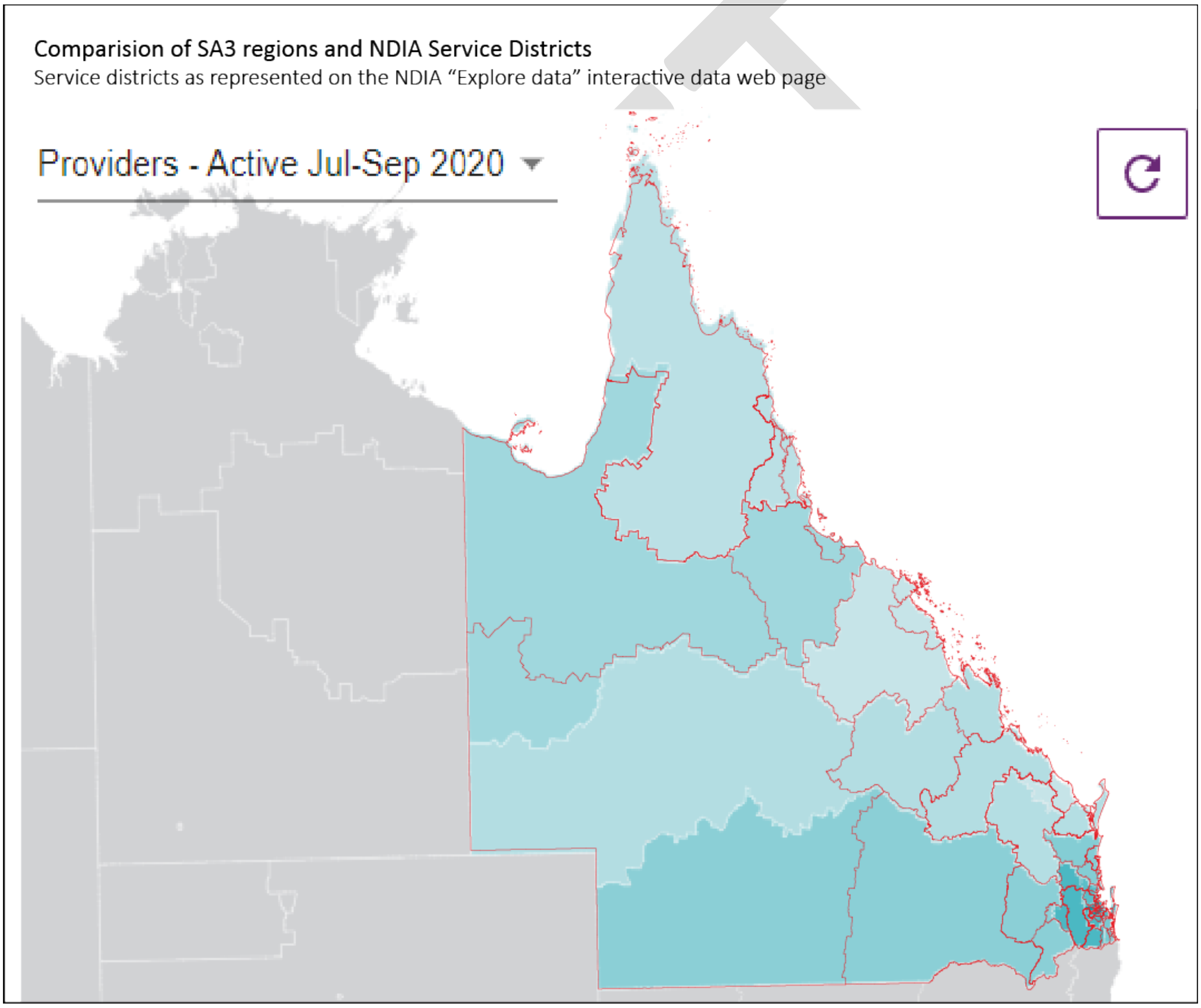

Figure 6 SA4 Region boundaries overlayed with NDIA service districts

Number of Enrolled SDA Dwellings

The following maps show the number, and geographic distribution, of currently enrolled SDA *dwellings* in Queensland.

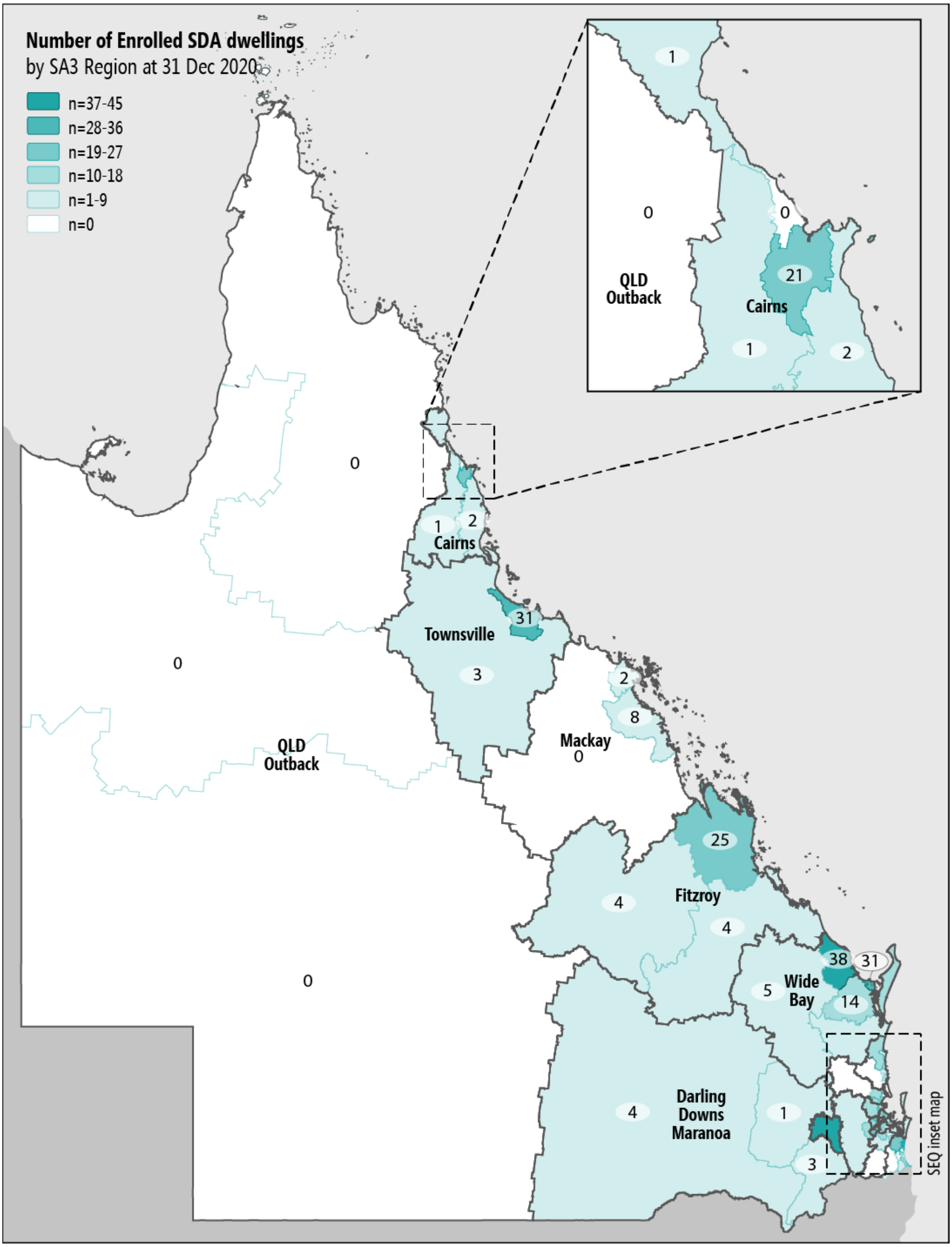

Figure 7 Number of enrolled SDA dwellings (Queensland)

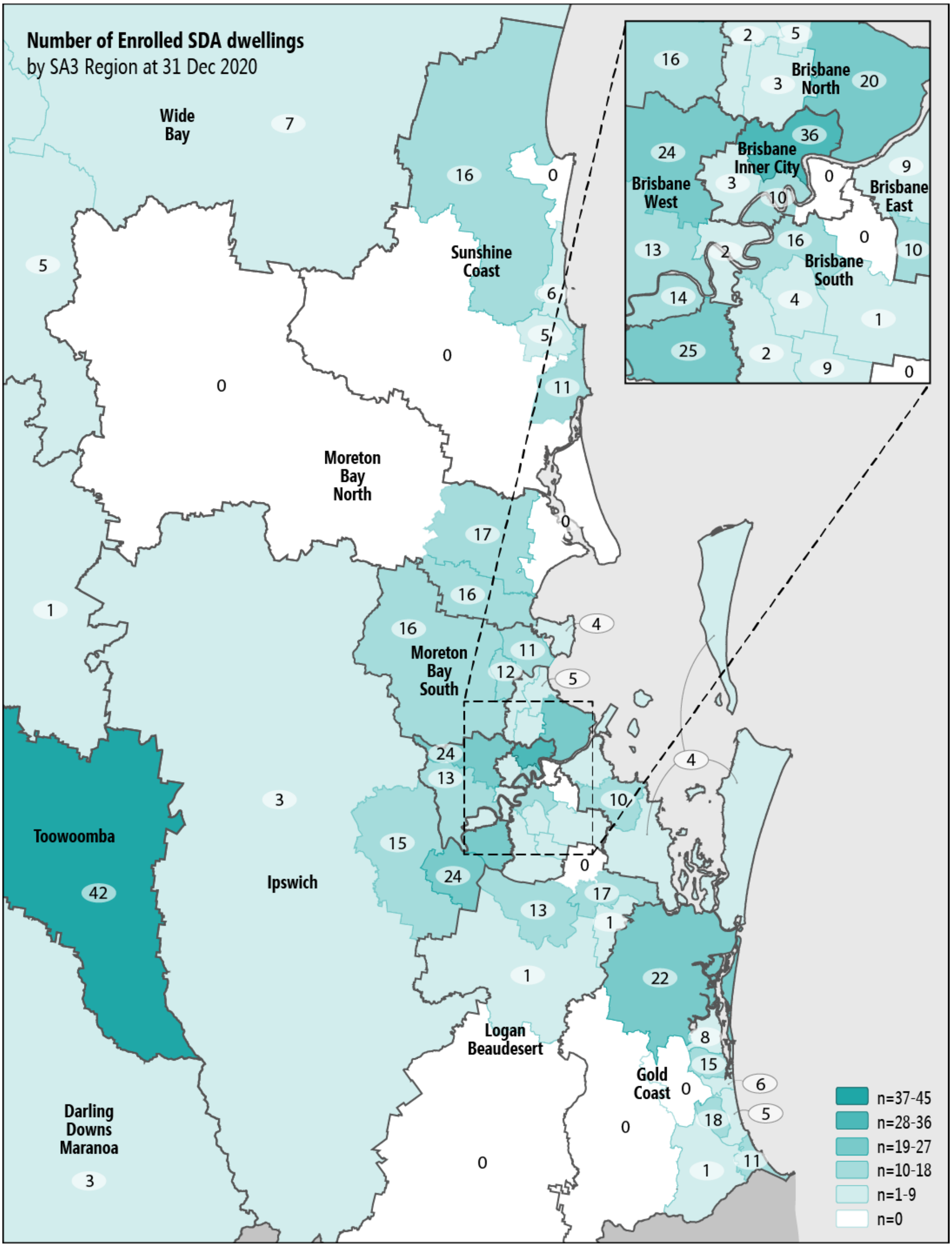

Figure 8 Number of enrolled SDA dwellings (Southeast Queensland)

The following table shows the total numbers of enrolled SDA dwellings by design category and build type.

Table 2: Number of enrolled SDA dwellings by SA3 Region as at 31 December 2020

			By Design Category					By Build Type				
SA4 Region	SA3 Region		Basic	Improved Liveability	High Physical Support	Robust	Fully Accessible	Existing	Legacy	New Build	New Build (Refurbishment)	**Total Dwellings**
301 Brisbane - East	30101	Capalaba	5	3	0	0	2	7	0	3	0	10
	30102	Cleveland - Stradbroke	1	1	1	1	0	2	0	2	0	4
	30103	Wynnum - Manly	0	2	5	1	1	4	0	5	0	9
302 Brisbane - North	30201	Bald Hills - Everton Park	0	1	0	0	1	0	1	1	0	2
	30202	Chermside	0	3	0	0	0	0	0	3	0	3
	30203	Nundah	9	1	10	0	0	9	1	10	0	20
	30204	Sandgate	1	0	3	0	1	5	0	0	0	5
303 Brisbane - South	30301	Carindale	0	0	0	0	0	0	0	0	0	0
	30302	Holland Park - Yeronga	0	1	15	0	0	4	1	11	0	16
	30303	Mt Gravatt	0	0	0	0	1	1	0	0	0	1
	30304	Nathan	1	2	0	0	0	1	2	0	0	3
	30305	Rocklea - Acacia Ridge	2	0	0	0	0	2	0	0	0	2
	30306	Sunnybank	6	3	0	0	0	9	0	0	0	9
304 Brisbane - West	30401	Centenary	0	0	14	0	0	14	0	0	0	14
	30402	Kenmore - Brookfield - Moggill	0	0	13	0	0	12	0	1	0	13
	30403	Sherwood - Indooroopilly	0	2	0	0	0	0	2	0	0	2
	30404	The Gap - Enoggera	1	20	3	0	0	19	0	5	0	24
305 Brisbane Inner City	30501	Brisbane Inner	0	0	10	0	0	0	0	10	0	10
	30502	Brisbane Inner - East	0	0	0	0	0	0	0	0	0	0
	30503	Brisbane Inner - North	3	2	19	0	12	5	0	30	1	36
	30504	Brisbane Inner - West	2	1	0	0	0	3	0	0	0	3
306 Cairns	30601	Cairns - North	0	0	0	0	0	0	0	0	0	0
	30602	Cairns - South	1	1	4	0	15	8	0	13	0	21
	30603	Innisfail - Cassowary Coast	0	0	0	0	2	2	0	0	0	2
	30604	Port Douglas - Daintree	1	0	0	0	0	1	0	0	0	1
	30605	Tablelands (East) - Kuranda	0	1	0	0	0	0	1	0	0	1
307 Darling Downs - Maranoa	30701	Darling Downs (West) - Maranoa	0	0	1	0	3	0	0	4	0	4
	30702	Darling Downs - East	0	1	0	0	0	1	0	0	0	1
	30703	Granite Belt	1	2	0	0	0	1	2	0	0	3
308 Fitzroy	30801	Central Highlands (Qld)	0	0	0	0	4	4	0	0	0	4
	30802	Gladstone - Biloela	1	2	0	0	1	4	0	0	0	4
	30803	Rockhampton	3	7	2	0	13	16	2	6	1	25
309 Gold Coast	30901	Broadbeach - Burleigh	4	0	1	0	0	4	0	1	0	5
	30902	Coolangatta	1	0	7	0	3	1	0	10	0	11
	30903	Gold Coast - North	3	0	0	0	5	8	0	0	0	8
	30904	Gold Coast Hinterland	0	0	0	0	0	0	0	0	0	0
	30905	Mudgeeraba - Tallebudgera	0	0	0	1	0	0	0	1	0	1
	30906	Nerang	0	0	0	0	0	0	0	0	0	0
	30907	Ormeau - Oxenford	0	1	16	1	4	8	0	14	0	22
	30908	Robina	0	0	18	0	0	0	0	18	0	18
	30909	Southport	1	9	3	0	2	1	2	10	2	15
	30910	Surfers Paradise	0	2	4	0	0	6	0	0	0	6
310 Ipswich	31001	Forest Lake - Oxley	3	9	0	11	2	24	0	1	0	25
	31002	Ipswich Hinterland	0	0	0	0	3	0	0	3	0	3
	31003	Ipswich Inner	4	2	5	3	1	7	0	8	0	15
	31004	Springfield - Redbank	0	6	16	0	2	5	1	18	0	24

311 Logan - Beaudesert	31101	Beaudesert	0	0	0	0	0	0	0	0	0		0
	31102	Beenleigh	1	0	0	0	0	1	0	0	0		1
	31103	Browns Plains	2	0	6	0	5	8	0	5	0		13
	31104	Jimboomba	0	0	0	0	1	0	0	1	0		1
	31105	Loganlea - Carbrook	2	5	8	2	0	3	1	13	0		17
	31106	Springwood - Kingston	0	0	0	0	0	0	0	0	0		0
312 Mackay	31201	Bowen Basin - North	0	0	0	0	0	0	0	0	0		0
	31202	Mackay	2	3	0	0	3	8	0	0	0		8
	31203	Whitsunday	0	2	0	0	0	2	0	0	0		2
313 Moreton Bay - North	31301	Bribie - Beachmere	0	0	0	0	0	0	0	0	0		0
	31302	Caboolture	0	5	3	8	1	8	2	7	0		17
	31303	Caboolture Hinterland	0	0	0	0	0	0	0	0	0		0
	31304	Narangba - Burpengary	0	0	8	4	4	9	0	7	0		16
	31305	Redcliffe	0	1	1	0	2	0	1	1	2		4
314 Moreton Bay - South	31401	The Hills District	1	4	8	0	3	5	0	11	0		16
	31402	North Lakes	1	0	8	0	2	1	0	10	0		11
	31403	Strathpine	0	9	1	0	2	11	0	1	0		12
315 Qld Outback	31501	Far North	0	0	0	0	0	0	0	0	0		0
	31502	Outback - North	0	0	0	0	0	0	0	0	0		0
	31503	Outback - South	0	0	0	0	0	0	0	0	0		0
316 Sunshine Coast	31601	Buderim	0	2	2	0	1	1	1	3	0		5
	31602	Caloundra	1	0	5	0	5	3	0	8	0		11
	31603	Maroochy	0	1	5	0	0	1	0	5	0		6
	31604	Nambour - Pomona	4	4	2	5	1	11	2	2	1		16
	31605	Noosa	0	0	0	0	0	0	0	0	0		0
	31606	Sunshine Coast Hinterland	0	0	0	0	0	0	0	0	0		0
317 Toowoomba	31701	Toowoomba	11	16	10	1	4	13	7	20	2		42
318 Townsville	31801	Charters Towers - Ayr - Ingham	2	1	0	0	0	3	0	0	0		3
	31802	Townsville	4	8	6	2	11	18	2	9	2		31
319 Wide Bay	31901	Bundaberg	8	14	3	5	8	17	3	17	1		38
	31902	Burnett	1	3	0	0	1	4	1	0	0		5
	31903	Gympie - Cooloola	0	7	0	0	0	7	0	0	0		7
	31904	Hervey Bay	9	2	1	2	17	15	0	16	0		31
	31905	Maryborough	2	2	3	4	3	11	0	2	1		14
		QLD TOTAL	105	174	250	51	152	358	35	326	13		732

Source: Quarterly Report to Disability Ministers for Q2 of 2020-2021 - Tables P. 17 & P.18 (additional to appendix P, p 550)

The main points to highlight from the maps and tables above include:

- **Basic:** Represents 14.3% of the current market total.
- **Improved Liveability:** Represents 23.8% of the current market total. In total, 37 of the 80 regions have no improved liveability SDA currently enrolled.
- **High Physical Support:** Represents 34.2% of the current market total. In total, 42 of the 80 SA3 regions have no high physical support SDA currently enrolled.
- **Robust:** Represents 6.9% of the current market total. In total, 65 of the 80 SA3 regions have no robust SDA currently enrolled.
- **Fully Accessible:** Represents 20.8% of the current market total. In total, 42 of the 80 SA3 regions have no fully accessible SDA currently enrolled.

There are currently no enrolled dwellings in the Queensland Outback region and a further 10 SA3 areas also have no enrolled dwellings in any category.

Data Limitations

Number of dwellings vs. number of resident places: The available data relating to the number of resident places in currently enrolled SDA dwellings includes a category for dwellings with a maximum of 6+ residents (reflecting 'legacy stock'). As this category could theoretically contain a range of values over 6, it is not possible to identify the exact number of resident places in currently enrolled SDA dwellings. This lack of specificity can frustrate meaningful comparisons between data sets.

Number of Participants Seeking SDA Dwellings

The following maps show the number, and geographic distribution, of participants who have SDA approved in their plan and are currently identified as seeking SDA.

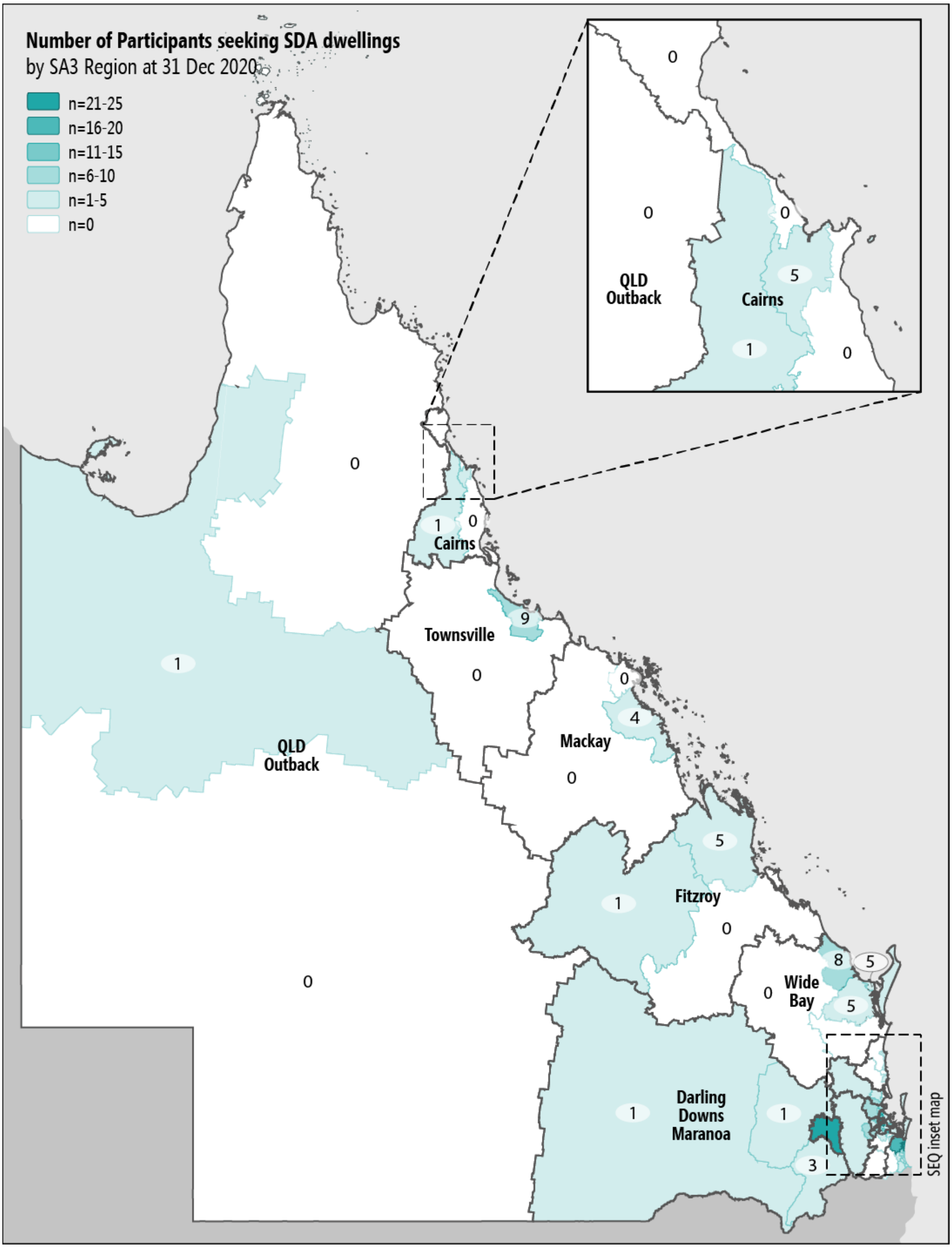

Figure 9 Number of participants seeking SDA dwellings (Queensland)

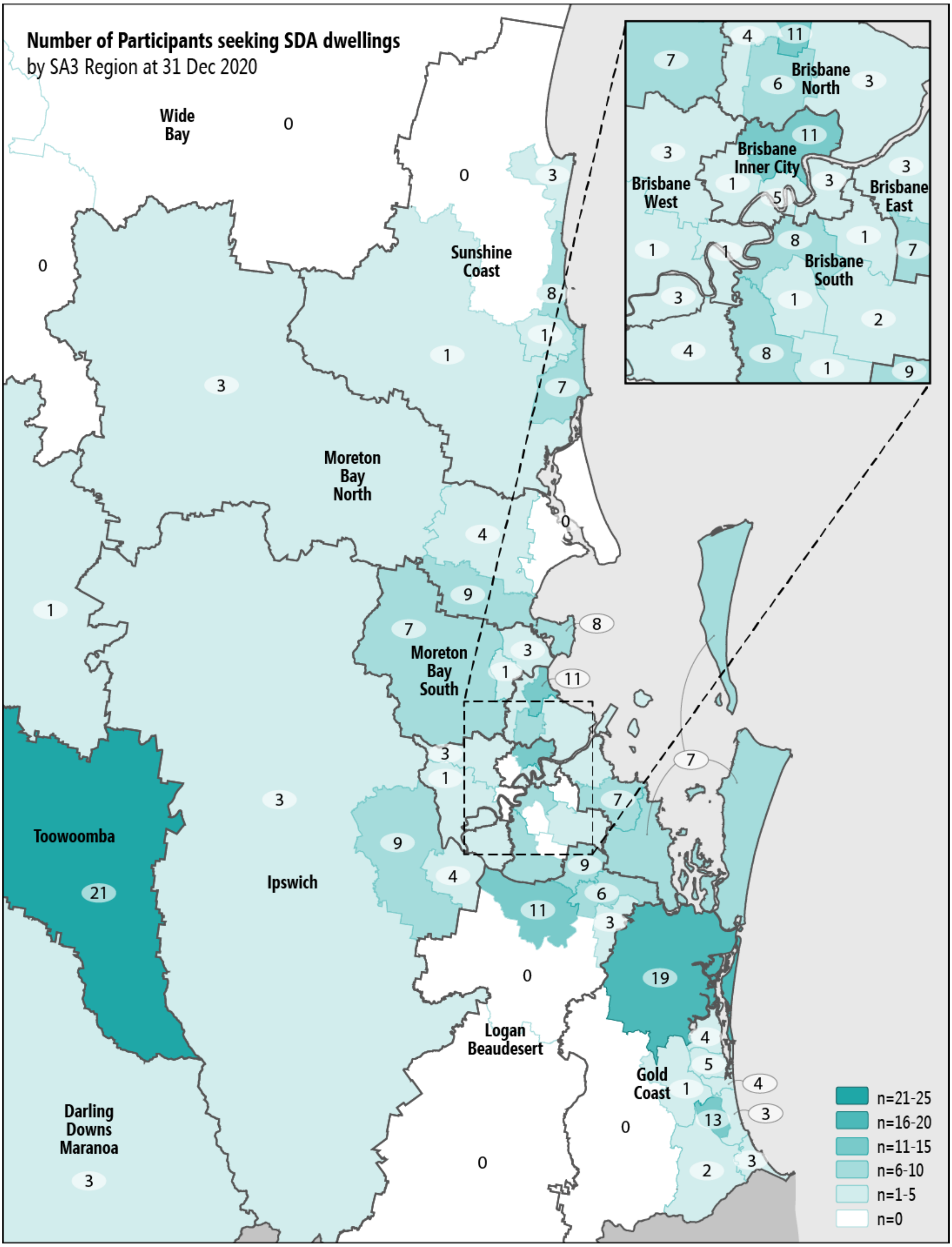

Figure 10 Number of participants seeking SDA dwellings (Southeast Queensland)

The following table shows the total numbers of participants who are seeking SDA by design category, as well as their current status (i.e., whether they are not currently housed in SDA and seeking an SDA dwelling, or whether they are currently housed in SDA and seeking an alternative SDA dwelling).

Table 3: Number of participants seeking an SDA dwelling by SA3 Region as at 31 December 2020

SA4 Region	SA3 Region		Not Defined	Improved Liveability	High Physical Support	Robust	Fully Accessible	**Total participants seeking SDA**	% Participants seeking SDA	In SDA dwelling	In SDA dwelling, seeking alternative	Not currently in SDA, seeking dwelling	**Total Participants with SDA need**
			Participants seeking SDA by Design Category							Participants with identified SDA needs by status			
301 Brisbane - East	30101	Capalaba	0	2	1	3	1	7	26%	20	2	5	27
	30102	Cleveland - Stradbroke	0	2	1	3	1	7	47%	8	1	6	15
	30103	Wynnum - Manly	0	0	1	0	2	3	15%	17	0	3	20
302 Brisbane - North	30201	Bald Hills - Everton Park	0	3	0	0	1	4	33%	8	3	1	12
	30202	Chermside	0	1	3	0	2	6	43%	8	1	5	14
	30203	Nundah	0	0	1	1	1	3	9%	32	1	2	35
	30204	Sandgate	0	0	8	0	3	11	34%	21	1	10	32
303 Brisbane - South	30301	Carindale	0	0	1	0	0	1	50%	1	0	1	2
	30302	Holland Park - Yeronga	0	2	4	0	2	8	31%	18	3	5	26
	30303	Mt Gravatt	0	1	1	0	0	2	40%	3	0	2	5
	30304	Nathan	0	0	1	0	0	1	6%	17	0	1	18
	30305	Rocklea - Acacia Ridge	1	2	4	1	0	8	62%	5	0	8	13
	30306	Sunnybank	0	0	0	0	1	1	6%	15	0	1	16
304 Brisbane - West	30401	Centenary	0	0	1	0	2	3	14%	19	0	3	22
	30402	Kenmore - Brookfield - Moggill	0	0	0	0	1	1	5%	18	1	0	19
	30403	Sherwood - Indooroopilly	0	0	0	0	1	1	10%	9	0	1	10
	30404	The Gap - Enoggera	0	3	0	0	0	3	9%	30	2	1	33
305 Brisbane Inner City	30501	Brisbane Inner	1	1	2	1	0	5	33%	10	2	3	15
	30502	Brisbane Inner - East	0	0	2	1	0	3	60%	2	0	3	5
	30503	Brisbane Inner - North	0	2	7	0	2	11	33%	22	5	6	33
	30504	Brisbane Inner - West	0	0	1	0	0	1	13%	7	0	1	8
306 Cairns	30601	Cairns - North	0	0	0	0	0	0	0%	5	0	0	5
	30602	Cairns - South	0	0	3	1	1	5	11%	40	0	5	45
	30603	Innisfail - Cassowary Coast	0	0	0	0	0	0	0%	9	0	0	9
	30604	Port Douglas - Daintree	0	0	0	0	0	0	0%	3	0	0	3
	30605	Tablelands (East) - Kuranda	0	0	1	0	0	1	20%	4	0	1	5
307 Darling Downs - Maranoa	30701	Darling Downs (West) - Maranoa	0	0	1	0	0	1	20%	7	0	1	8
	30702	Darling Downs - East	0	1	0	0	0	1	13%	4	0	1	5
	30703	Granite Belt	0	0	1	1	1	3	14%	19	0	3	22
308 Fitzroy	30801	Central Highlands (Qld)	0	0	0	0	1	1	20%	4	0	1	5
	30802	Gladstone - Biloela	0	0	0	0	0	0	0%	11	0	0	11

Table 3: Number of participants seeking an SDA dwelling
by SA3 Region as at 31 December 2020

SA4 Region	SA3 Region		Participants seeking SDA by Design Category: Not Defined	Improved Liveability	High Physical Support	Robust	Fully Accessible	**Total participants seeking SDA**	% Participants seeking SDA	Participants with identified SDA needs by status: In SDA dwelling	In SDA dwelling, seeking alternative	Not currently in SDA, seeking dwelling	**Total Participants with SDA need**
	30803	Rockhampton	0	0	3	0	2	**5**	6%	81	1	4	**86**
309 Gold Coast	30901	Broadbeach - Burleigh	0	0	1	0	2	**3**	23%	10	0	3	**13**
	30902	Coolangatta	0	1	1	0	1	**3**	30%	7	0	3	**10**
	30903	Gold Coast - North	0	0	1	0	3	**4**	36%	7	1	3	**11**
	30904	Gold Coast Hinterland	0	0	0	0	0	**0**	0%	0	0	0	**0**
	30905	Mudgeeraba - Tallebudgera	0	0	1	0	1	**2**	50%	2	0	2	**4**
	30906	Nerang	0	0	0	0	1	**1**	50%	1	0	1	**2**
	30907	Ormeau - Oxenford	1	5	10	0	3	**19**	40%	29	7	12	**48**
	30908	Robina	0	2	7	0	4	**13**	76%	4	6	7	**17**
	30909	Southport	0	1	2	0	2	**5**	21%	19	2	3	**24**
	30910	Surfers Paradise	1	0	3	0	0	**4**	50%	4	1	3	**8**
310 Ipswich	31001	Forest Lake - Oxley	1	1	0	0	2	**4**	10%	37	0	4	**41**
	31002	Ipswich Hinterland	1	0	1	0	1	**3**	50%	3	0	3	**6**
	31003	Ipswich Inner	0	2	1	4	2	**9**	6%	141	1	8	**150**
	31004	Springfield - Redbank	0	1	2	0	1	**4**	8%	47	2	2	**51**
311 Logan - Beaudesert	31101	Beaudesert	0	0	0	0	0	**0**	0%	12	0	0	**12**
	31102	Beenleigh	0	1	1	0	1	**3**	50%	3	0	3	**6**
	31103	Browns Plains	0	2	4	1	4	**11**	26%	32	4	7	**43**
	31104	Jimboomba	0	0	0	0	0	**0**	0%	6	0	0	**6**
	31105	Loganlea - Carbrook	1	2	2	0	1	**6**	26%	17	0	6	**23**
	31106	Springwood - Kingston	0	1	6	0	2	**9**	64%	5	0	9	**14**
312 Mackay	31201	Bowen Basin - North	0	0	0	0	0	**0**	0%	0	0	0	**0**
	31202	Mackay	0	0	4	0	0	**4**	16%	21	2	2	**25**
	31203	Whitsunday	0	0	0	0	0	**0**	0%	2	0	0	**2**
313 Moreton Bay - North	31301	Bribie - Beachmere	0	0	0	0	0	**0**	0%	0	0	0	**0**
	31302	Caboolture	0	1	1	0	2	**4**	11%	32	0	4	**36**
	31303	Caboolture Hinterland	0	0	1	1	1	**3**	75%	1	1	2	**4**
	31304	Narangba - Burpengary	0	0	2	1	6	**9**	26%	26	4	5	**35**
	31305	Redcliffe	0	1	4	0	3	**8**	35%	15	0	8	**23**
314 Moreton Bay - South	31401	The Hills District	0	1	4	0	2	**7**	37%	12	2	5	**19**
	31402	North Lakes	0	1	0	1	1	**3**	38%	5	1	2	**8**
	31403	Strathpine	0	1	0	0	0	**1**	7%	14	0	1	**15**
315 Qld Outback	31501	Far North	0	0	0	0	0	**0**	0%	1	0	0	**1**
	31502	Outback - North	0	0	0	0	1	**1**	50%	1	0	1	**2**
	31503	Outback - South	0	0	0	0	0	**0**	0%	0	0	0	**0**

316 Sunshine Coast	31601	Buderim	0	0	1	0	0	1	7%	13	1	0	14
	31602	Caloundra	0	2	3	0	2	7	26%	20	0	7	27
	31603	Maroochy	0	0	7	0	1	8	44%	10	1	7	18
	31604	Nambour - Pomona	0	0	0	0	0	0	0%	32	0	0	32
	31605	Noosa	0	0	1	0	2	3	100%	0	0	3	3
	31606	Sunshine Coast Hinterland	0	0	0	0	1	1	14%	6	0	1	7
317 Toowoomba	31701	Toowoomba	2	6	7	3	3	21	10%	181	8	13	202
318 Townsville	31801	Charters Towers - Ayr - Ingham	0	0	0	0	0	0	0%	13	0	0	13
	31802	Townsville	0	0	7	1	1	9	18%	41	3	6	50
319 Wide Bay	31901	Bundaberg	0	0	7	1	0	8	13%	53	3	5	61
	31902	Burnett	0	0	0	0	0	0	0%	16	0	0	16
	31903	Gympie - Cooloola	0	0	0	0	0	0	0%	21	0	0	21
	31904	Hervey Bay	0	0	1	0	4	5	15%	29	2	3	34
	31905	Maryborough	0	0	3	0	2	5	21%	19	2	3	24
		QLD TOTAL	9	52	144	25	88	318	18%	1447	77	241	1765

Source: Quarterly Report to Disability Ministers for Q2 of 2020-2021 - Tables P. 22 & P.23 (additional to appendix P, p 550)

The above tables provide an overview of the participants who have SDA approved in their plan that have been identified by the NDIA as currently seeking SDA. The total percentage of participants with SDA approved in their plans currently seeking SDA across all Queensland regions is 18%. However, this varies significantly across regions, with some regions such as Noosa (31605) having as high as 100% of approved participants seeking SDA.

Data Limitations

These data represent the number of participants who have SDA approved in their plan and are identified by the NDIA as seeking SDA (as at 31 Dec 2020). It does not include:

- Participants who have applied for SDA in their plan and have not yet received approval;
- Individuals who have not been approved for SDA but may still be seeking housing; and
- Anticipated future demand for SDA.

Given the long lead times associated with housing development and construction, there remains a need for reliable projections of demand.

Number of Unfinished (Unenrolled) New Build SDA dwellings

In early 2021, the NDIA released data on the number of 'Unfinished (Unenrolled) New Build SDA Dwellings' for the first time. This "SDA pipeline data is based on information collected by the NDIA from SDA providers who are building properties they intend to enrol as SDA at a later date"[11]. This data is represented in the following maps, which show the number and geographic distribution of resident places that are 'in the pipeline'.

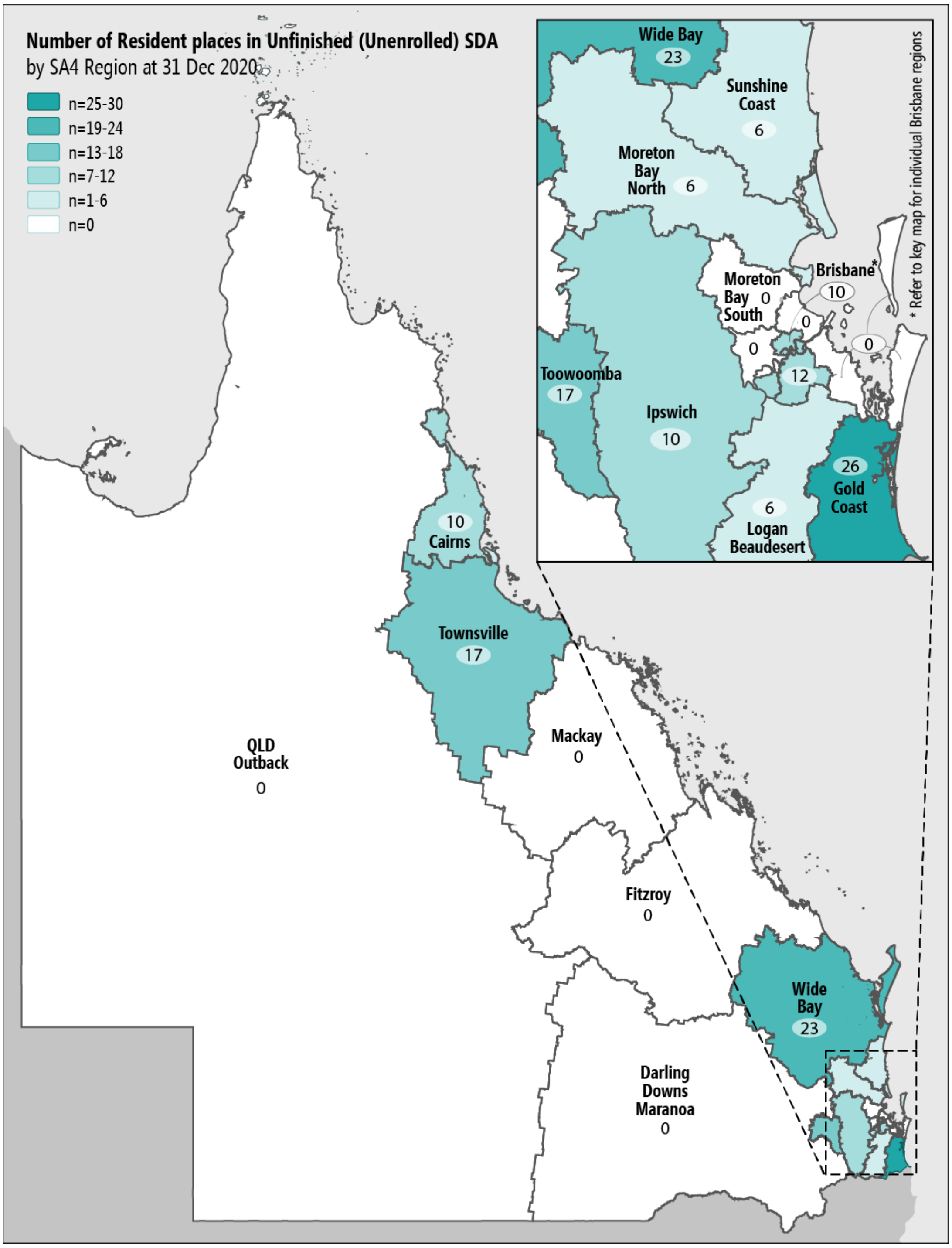

Figure 11 Number of resident places in unfinished (unenrolled) new build SDA dwellings (Queensland)

[11] Source: "Definitions" section of the SDA data available for download via the NDIA web page in excel format.

The following table shows the total numbers of 'Unfinished (Unenrolled) New Build SDA', grouped according to the number of dwellings, the number of resident places, and broken down into design category.

Table 4: Unfinished (unenrolled) new build SDA dwellings
by SA4 Region and Design Category as at 31 December 2020

SA4 Region		No. Dwellings: Basic	Improved Liveability	High Physical Support	Robust	Fully Accessible	**Total no. Dwellings**	No. Resident Places: Basic	Improved Liveability	High Physical Support	Robust	Fully Accessible	**Total no. Resident Places**
301	Brisbane - East	0	0	0	0	0	0	0	0	0	0	0	0
302	Brisbane - North	0	0	0	0	0	0	0	0	0	0	0	0
303	Brisbane - South	0	0	8	0	4	12	0	0	8	0	4	12
304	Brisbane - West	0	0	0	0	0	0	0	0	0	0	0	0
305	Brisbane Inner City	0	0	8	0	2	10	0	0	8	0	2	10
306	Cairns	0	0	4	0	0	4	0	0	10	0	0	10
307	Darling Downs - Maranoa	0	0	0	0	0	0	0	0	0	0	0	0
308	Fitzroy	0	0	0	0	0	0	0	0	0	0	0	0
309	Gold Coast	0	0	20	0	1	21	0	0	22	0	4	26
310	Ipswich	0	0	1	0	2	3	0	0	2	0	8	10
311	Logan - Beaudesert	0	0	2	0	0	2	0	0	6	0	0	6
312	Mackay	0	0	0	0	0	0	0	0	0	0	0	0
313	Moreton Bay - North	0	0	2	0	0	2	0	0	6	0	0	6
314	Moreton Bay - South	0	0	0	0	0	0	0	0	0	0	0	0
315	Queensland - Outback	0	0	0	0	0	0	0	0	0	0	0	0
316	Sunshine Coast	0	0	0	0	2	2	0	0	0	0	6	6
317	Toowoomba	0	0	0	0	5	5	0	0	0	0	17	17
318	Townsville	0	0	13	0	1	14	0	0	13	0	4	17
319	Wide Bay	0	0	4	0	4	8	0	0	11	0	12	23
	QLD TOTAL	0	0	62	0	21	83	0	0	86	0	57	143

Source: Quarterly Report to Disability Ministers for Q2 of 2020-2021 - Table P.10 (p 543) & Table P.21 (additional to appendix P, p 550). Number of resident places based on calculation of maximum number of residents listed for each dwelling.

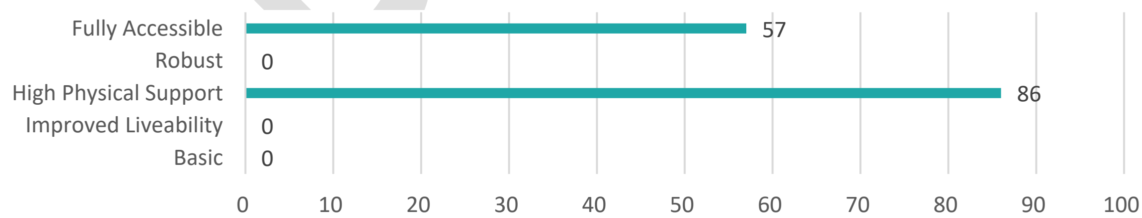

Figure 12 Number of resident places in unfinished (unenrolled) new build SDA by design category

As the preceding table and graph illustrate, there is a complete absence of unfinished/unenrolled dwellings in the pipeline in the 'improved liveability' and 'robust' categories. Similarly, the data indicate a distinct lack of development outside of the Cairns, Townsville, and Southeast Queensland regions. In total, listed development was constrained to less than 10% of the total geographical areas of Queensland.

Data Limitations

- **Supply side data limitations:** The 'Unfinished (Unenrolled) New Build SDA Dwellings' data were released for the first time by the NDIA in early 2021 with the following caveat:

  > "This data is intended for the purpose of SDA market oversight only and there is no guarantee from the NDIA that all the dwellings listed will be enrolled as SDA. There may also be under-construction properties which will be enrolled as SDA which are not represented in the data."

  As a result, these data may not necessarily capture all of the SDA dwellings currently under construction. For example, the 31 December 2020 data set identifies a total of 83 "Unfinished (Unenrolled) New Build SDA Dwellings" including a total of 143 resident places. In comparison, the most recent report by The Summer Foundation (2021) estimates a total of 366 dwellings in development in Queensland (as at 10 November 2020) which contain a total of 520 Resident Places (The Summer Foundation, 2021, p. 2).

Undersupply / shortfall of SDA dwellings

The following map shows the number and geographic distribution of resident places in 'Unfinished (Unenrolled)' new build SDA dwellings in relation to the total numbers of identified individuals seeking SDA in each region[12].

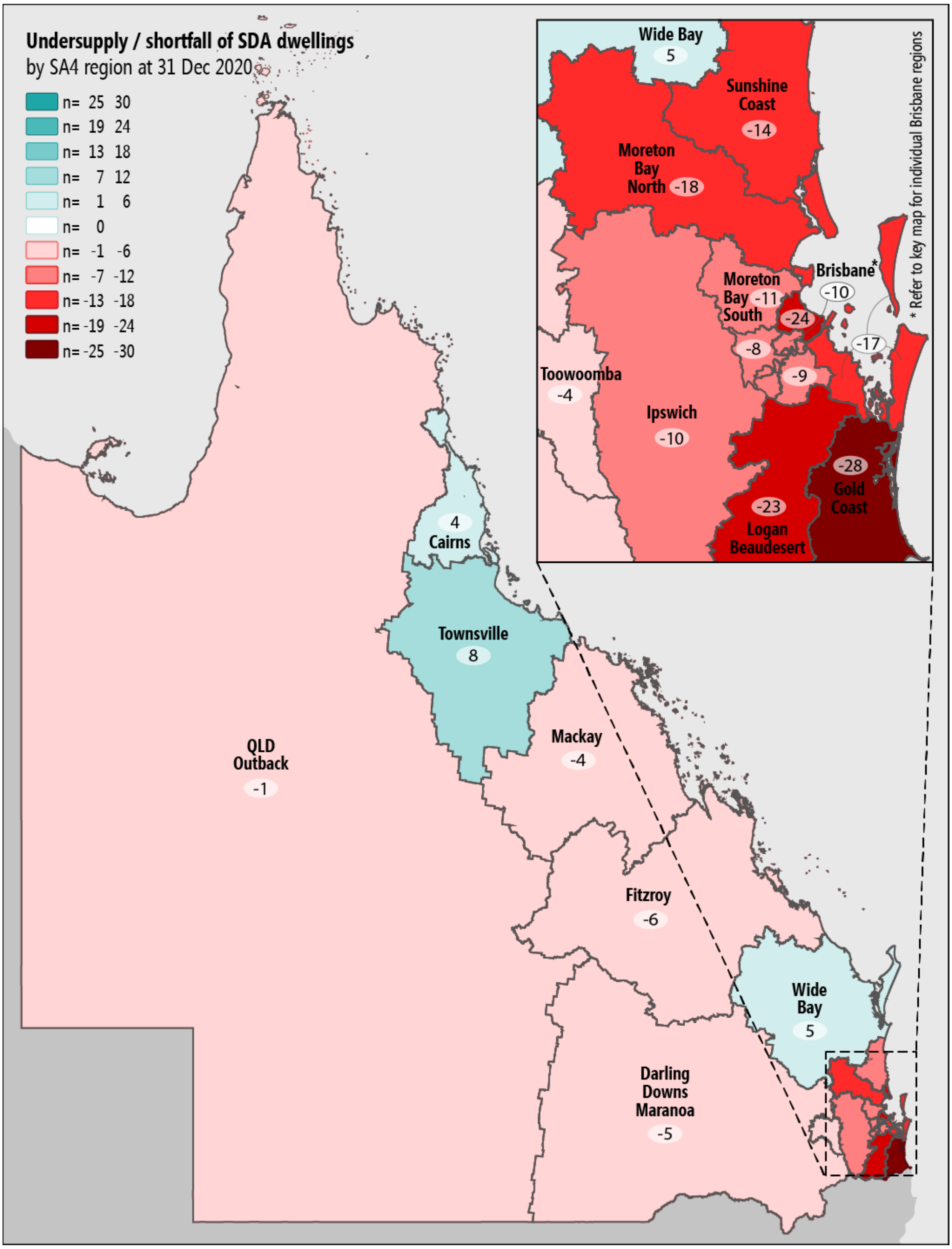

Figure 13 Total undersupply / shortfall SDA dwellings (Queensland)

[12] The number of identified participants seeking SDA subtracted from the number of resident places in unfinished / unenrolled SDA.

As the preceding map uses totals, it needs to be noted that issues of matching supply and demand also extends into 'type' of dwelling. This detail is captured in the table and chart below, which show the number of participants seeking SDA subtracted from the number of resident places in unfinished /unenrolled SDA ('in the pipeline'), by design category and region.

Table 5: Undersupply / shortfall
by SA4 Region and Design Category as at 31 December 2020

SA4 Region		No. participants identified as seeking SDA subtracted from no. resident places in unfinished / unenrolled SDA					
		Not Defined	Improved Liveability	High Physical Support	Robust	Fully Accessible	**Total Shortfall per region**
301	Brisbane - East	0	-4	-3	-6	-4	**-17**
302	Brisbane - North	0	-4	-12	-1	-7	**-24**
303	Brisbane - South	-1	-5	-3	-1	1	**-9**
304	Brisbane - West	0	-3	-1	0	-4	**-8**
305	Brisbane Inner City	-1	-3	-4	-2	0	**-10**
306	Cairns	0	0	6	-1	-1	**4**
307	Darling Downs - Maranoa	0	-1	-2	-1	-1	**-5**
308	Fitzroy	0	0	-3	0	-3	**-6**
309	Gold Coast	-2	-9	-4	0	-13	**-28**
310	Ipswich	-2	-4	-2	-4	2	**-10**
311	Logan - Beaudesert	-1	-6	-7	-1	-8	**-23**
312	Mackay	0	0	-4	0	0	**-4**
313	Moreton Bay - North	0	-2	-2	-2	-12	**-18**
314	Moreton Bay - South	0	-3	-4	-1	-3	**-11**
315	Queensland - Outback	0	0	0	0	-1	**-1**
316	Sunshine Coast	0	-2	-12	0	0	**-14**
317	Toowoomba	-2	-6	-7	-3	14	**-4**
318	Townsville	0	0	6	-1	3	**8**
319	Wide Bay	0	0	0	-1	6	**5**
	QLD TOTAL	**-9**	**-52**	**-58**	**-25**	**-31**	**-175**

Source: Calculations made based on data presented in the Quarterly Report to Disability Ministers for Q2 of 2020-2021 - Table P.12 (p 548) & Table P.21 (additional to appendix P, p 550)

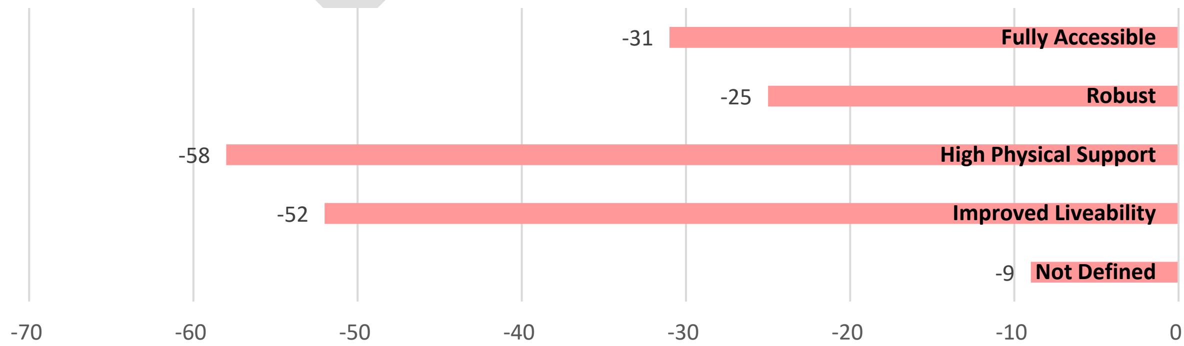

Figure 14 Shortfall / undersupply of SDA by design category

Data Limitations

As data utilised in this section brings together data from earlier sections, the previously stated limitations apply here also.

Phase 1b: Additional Data Limitations

In addition to the limitations identified previously for each data set, the following general limitations apply to all of the data in Phase 1b:

Geographic regions: Prior to September 2020 the available data released by the NDIA on SDA were limited to the SA4 level. Given the significant size of some SA4 regions in Queensland this constrained limited the usefulness of these data. While the provision of additional data at the SA3 level represents an improvement on previous releases, the following limitations still exist:

- **Not all data sets are available at SA3 level:** As the mapping illustrates, the data in relation to unfinished / unenrolled dwellings provided are at the SA4 level. These data were only released for the first time in February 2021, and it is hoped that future releases may include data at the SA3 level.
- **Size of SA3 areas in relation to cohort:** As the mapping illustrates, even at SA3 level, there are regions 30,708,217 hectares[13] in size which only contain a single individual identified as seeking SDA. For providers attempting to meet this demand, it is necessary to better understand where in a region this size the accommodation may be needed.
- **Service regions versus statistical areas:** As Figure 6 illustrates, there are notable differences between the ABS statistical areas and the NDIA service districts. As such, the provision of some data sets in relation to service districts, and other data sets in statistical areas, can prove a barrier to full utilisation of the data and drawing useful comparisons between them.

[13] SA3 region 31502 (QLD OUTBACK NORTH) Data source: https://itt.abs.gov.au/itt/r.jsp?RegionSummary&region=31502&dataset=ABS_REGIONAL_ASGS2016&geoconcept=ASGS_2016&measure=MEASURE&datasetASGS=ABS_REGIONAL_ASGS2016&datasetLGA=ABS_REGIONAL_LGA2019&regionLGA=LGA_2019&regionASGS=ASGS_2016

Discussion

The following section highlights some of the most significant findings to emerge from Phase 1.

Key Findings [Phase 1]

Provider Landscape

Specialist disability accommodation providers

Key features of the SDA provider marketplace indicated from the interpretation of available data include:

- The majority of registered providers (55%) created the ABN associated with their listed business name after July 2013 (the date that the NDIA pilot programs began roll out in Australia);
- There has been a clear bell curve associated with new provider ABN registrations which surged amongst Queensland providers following the start of the state rollout / introduction of SDA funding (July 2016), peaking in 2018 and dropping each year thereafter;
- Only 11% of the currently registered providers have ever been active – which is less than a third of the national average (34%); and
- The majority of registered SDA providers in Queensland operate on a for-profit basis (i.e., they do not have a not-for-profit or charitable status associated with the ABN associated with their registered name).

Whilst these findings hold some interest on their own, they are increasingly useful when viewed contextually against the findings of the following phases.

Disability Accommodation Landscape

Accommodation provision in regional and remote areas

As illustrated in this report, Queensland is characterised by areas of significant geographical size, some of which currently have little identified demand for specialist disability accommodation[14]. When compared to other services, SDA is unique in that it is by its nature fixed in location and unable to be moved to accommodate fluctuations in market demand. It also has relatively long lead times associated, with the design, development and building process often spanning years from beginning to end.

From a provider perspective, creating suitable accommodation to match the market needs in rural and regional areas requires finer grained information, as to where those with identified need are located and what their needs are, than in metropolitan centres (where both demand

[14] Note: It needs to be acknowledged that the current statistics around demand may not be an accurate reflection of actual need. The unmet need in these areas may be greater than these statistics indicate for a range of reasons including difficulties accessing professionals to aid in the creation of NDIA submissions and plans.

and supply are greater). The risk-reward profile for those seeking to build SDA regionally can also be significantly different to metropolitan areas. For example, if an individual residing in SDA in a metropolitan area elects to move to alternative accommodation the provider is more likely (statistically, by way of sheer population size) to find others to occupy the accommodation. In regional areas where demand is markedly lower, the risk of a property sitting vacant in the event of a resident moving can be seen to increase significantly.

The intersection between care and accommodation can also become more pronounced in regional and remote areas, where challenges associated with accessing necessary service provision [particularly for those requiring supported independent living (SIL)] can be greater.

Indigenous Communities

Queensland has the greatest number of Indigenous communities out of all the states and territories[15]. Of these communities, 21 of the total 26 in Queensland (Australian Government, 2021) are in very remote locations (MM7). The Qld Productivity Commission similarly highlighted the percentage of Queensland's Indigenous population that resides in remote and very remote areas (18% reside in MM6-7) is notably higher than other states such as Victoria (.5% reside in MM6-7) (Queensland Productivity Commission, 2020, p. 358). When combined with the fact that close to double (28%) of Indigenous NDIA participants live in rural and remote areas compared to non-Indigenous participants (16%) (Queensland Productivity Commission, 2020, p. 358), it becomes clear that a lack of SDA supply (both current and future pipeline) in regional and remote areas can disproportionally impact on Indigenous participants. The following map illustrates the distribution of the 26 communities across the state.

[15] Qld (26), NT (20), WA (10), SA (8) and ACT (0), Tas (0) and Vic (0) (Australian Government, 2021)

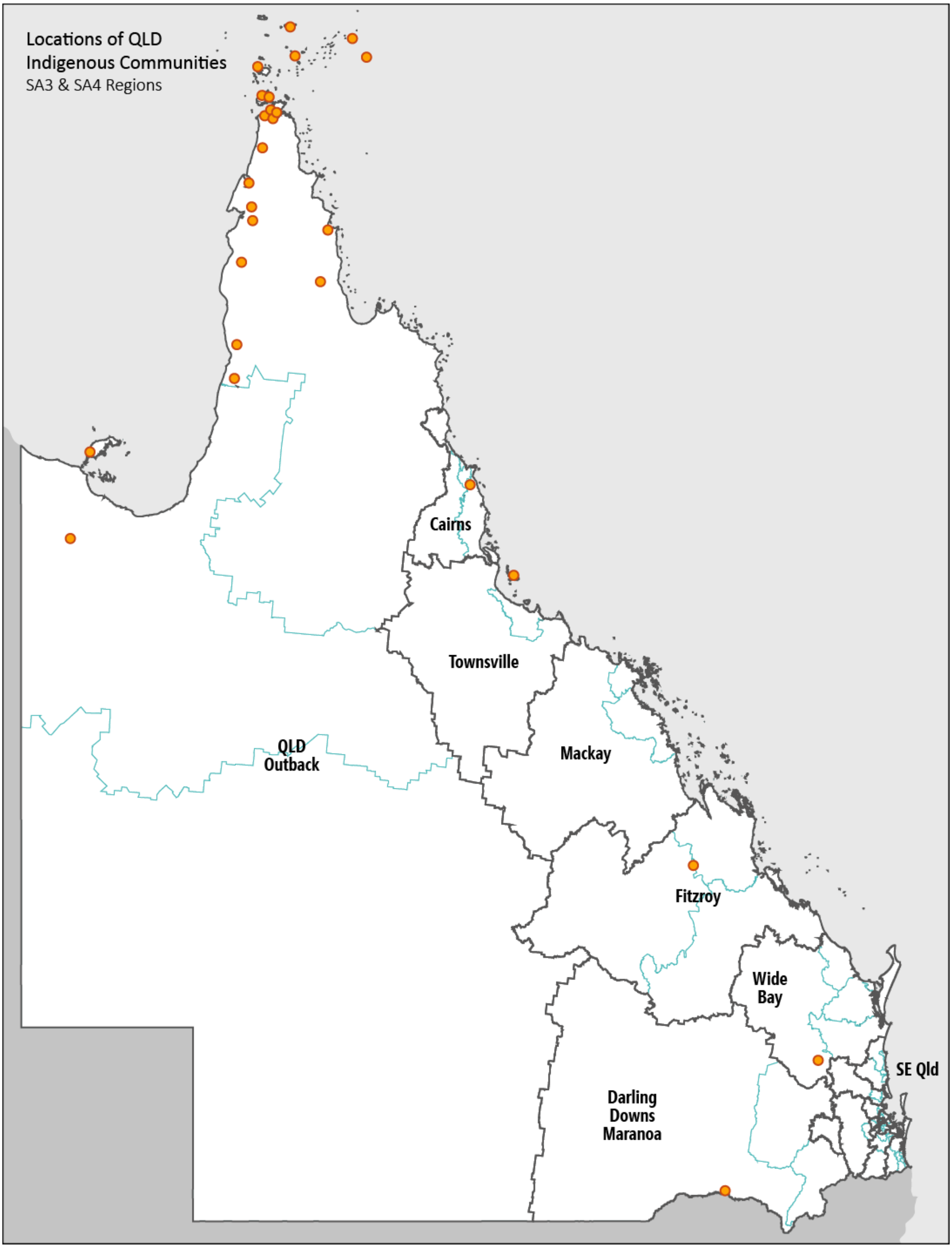

Figure 15 Queensland Indigenous communities relative to SA3 & SA4 statistical regions

Market mismatches

As touched upon, in addition to a need to match supply and demand in relation to *quantity* and *geographical distribution* of accommodation, there are additional factors which add levels of complexity to this marketplace:

- **Market focus on 'high physical support' and 'fully accessible' categories:** NDIA data presented here and other sources such as recent Summer Foundation survey data (The Summer Foundation, 2020, 2021) show a strong trend towards predominately building only two of the five types of SDA in Queensland. The lack of reported unenrolled/unfinished SDA in the 'improved liveability' and 'robust' categories supports this finding. Given that there are currently 86 participants in Queensland seeking this type of accommodation (with more expected to be approved for these accommodation types in the future) the gap between supply and demand in these categories is expected to continue to grow.
- **Mismatches between types of SDA across regions:** The lack of development in three out of the five categories is more pronounced when variations between the demand in certain regions is taken into account. For example, in the demand data, there are at least eight regions (potentially more if those in the 'non defined' category are factored in) where 50% or greater of the specified need is in the categories identified as not currently being built. In addition, there are two regions where 100% of the stated demand is within these categories.
- **Time as a market factor:** In addition to the factors listed above, time needs to be recognised as an important factor in relation to attempts to achieve market alignment, particularly:
    - **Lead times associated with building and development:** As touched upon, building and development projects generally have significant lead times associated (e.g., two to five years depending on the size and complexity of the project). As a result, reliable projections of future demand (including type and location) are critical in being able to deliver products that match market needs.
    - **Participant mobility over time:** Unlike previous disability accommodation schemes, participants in the NDIA have the ability to move locations as desired or needed. This ability for movement adds an extra layer of complexity in 'matching' the supply and demand sides of the market.

Recommendations

There are a number of clear 'mismatches' between what is currently available, or emerging, and what has been identified as needed in the Qld SDA marketplace. Phase 1 of the research has uncovered 'mismatches' happening both in relation to the *type* of accommodation (the 'what') and its geographical *location* ('the where').

It needs to be noted that in the hypothetical event that every individual seeking accommodation was able to be 'matched' with accommodation - the principle of 'choice and control' which underpins the NDIA means that individuals still have the ability to seek alternatives over time. This introduces an element of unpredictability for those attempting to 'match' supply and demand. Further, the natural time delays associated with building and construction projects adds additional complexity to this picture, necessitating that the question of 'when' be added to the already complicated process of matching 'what' and 'where'. In responding to these increasing layers of complexity, the following recommendations are focused on ways forward which have the potential to simplify, rather than add to, the complexity.

Recommendation for Reducing Complexity

Introduction of minimum accessibility standards

The introduction of minimum accessibility standards in the building code, a proposal which has recently been agreed by state and territory Building Ministers[16], has the potential to result in tens of thousands of accessible properties being created throughout Queensland every year[17]. While these are not expected to be 'turnkey ready' as SDA - many of the features inherent in them have the potential to facilitate cheaper and faster modification to suit individual needs. In addition to creating a strong pipeline of more easily (and economically) modifiable properties, it also has the ability to address the current problem of SDA development being concentrated within particular regions – as all new housing regardless of location would need to comply. This has the added potential of resulting in significant savings in relation to home modification works.

Recommendations for Improvements in Co-ordination

Continued improvement to data release surrounding SDA

As this report has highlighted, access to accurate and timely data is important for those attempting to match supply and demand within this market - particularly in areas characterised by low demand over large geographical areas. The recent Productivity Commission inquiry into the NDIS market in Queensland similarly highlighted that "to improve the functioning of the NDIS accommodation market in Queensland: − more granular

[16] Building Ministers' Meeting: Communique April 2021 ([Building Ministers' Meeting: Communiqué April 2021 | Department of Industry, Science, Energy and Resources]())
[17] Note: the level of accessibility of these depends on the finer details of what is included in the changes.

information on the supply and demand of accommodation and SIL should be provided and communicated to the market" (Queensland Productivity Commission, 2020, p. 238).

While the recent release of additional SDA data has been helpful, as this report has identified there still remains areas where more data would be valuable. For example, the new interactive data tool which has been launched on the NDIA website has the potential to be useful within the sector to help quickly understand geographical trends in the supply and demand of specialist disability accommodation, as it allows data to be visualised in both map and table format. The inclusion in this tool of the detailed SDA data that are released quarterly (currently made available via the NDIA 'Data download' page in *.CSV format) could prove useful to the market. Data related to participants seeking SDA by design category, and data surrounding the 'pipeline' of unfinished (unenrolled) dwellings coming onto the market has particular value. This tool, however, currently displays the data by 'NDIA Service district', while the SDA data are released by SA3 and SA4 statistical region.

Given the small percentage of providers who have ever been active, the ability to identify which providers have been active and those who have not been active, would also be valuable in providing a better understanding of the marketplace and how it is currently functioning.

Approaches to market stewardship

A number of market sectors, such as regional / remote and certain SDA types (i.e., robust), may continue to carry a reward-risk profile that fails to be attractive for investors. As a result, different approaches and/or models may need to be considered to ensure participants in need are afforded access. In responding to the identified lack of service and accommodation in regional and remote areas the Queensland Productivity Commission has similarly highlighted that:

> While solutions should aim to support competitive market outcomes, alternative commissioning models may be necessary to facilitate the delivery of reasonable and necessary supports to participants in some areas (Queensland Productivity Commission, 2020, p. 318)

While the NDIA has undertaken to fulfill a 'market stewardship' role which "…includes monitoring, evaluation, oversight and, where necessary, intervention"(National Disability Insurance Scheme, October 2018, p. 4), the Market Enablement Framework (2018) speaks of expectations that "…the market will develop organically to meet the needs of participants, and that any intervention will reduce over time" (National Disability Insurance Scheme, October 2018, p. 4). References to intervention describe using "the lightest touch to resolve the issue on behalf of participants or the market as a whole" (National Disability Insurance Scheme, October 2018, p. 4). While more targeted strategies for identified 'thin' markets (e.g., Rural and Remote Strategy and the Aboriginal and Torres Strait Islander Engagement Strategy) have been developed, the reality of whether these initiatives are sufficient to generate the solutions sought will become more evident as the scheme progresses. In relation to SDA, it is possible that some of the 'thin markets' (for example the 'Queensland Outback' region) may never have enough demand, or a risk-reward ratio that is attractive to an open market.

Phase 1 of the research has highlighted a need for approaches which both reduce complexity and improve co-ordination in the sector. In relation to the latter, easy access to detailed, timely data is a key factor in facilitating the matching of supply and demand in this sector. While improvements have recently been made in this area, this report has identified a number of areas where more detailed insights would provide value to the market. The need for improved co-ordination also raises questions of whether a review of current approaches to 'market stewardship' is necessary in order to address identified areas of increasingly unmet need such as SDA categories and regions.

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contact us

The Hopkins Centre
Menzies Health Institute Qld
Griffith University

Division of Rehabilitation
Metro South Health
199 Ipswich Road
Woolloongabba QLD 4102

+61 7 3382 1295

hopkinscentre@griffith.edu.au

www.hopkinscentre.edu.au

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