



COMMUNITY HOUSING
Industry Association Victoria

Practice Guidance

Accessibility modifications



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Purpose

The purpose of this guide is to support Community Housing Organisations (CHOs) to deal fairly, efficiently, and appropriately with renter requests for accessibility modifications to their property due to disability.

This guide is designed to complement the template [Accessibility Modifications Policy](#) by providing further details on how to deal with accessibility modifications under that policy and assist to establish procedures and processes.

Should you have any questions or comments on any of the information in this guide, please email leadingpractice@chiavic.com.au.

Key resources

The key resources referred to in this guide can be found below.

Key resources	Links
Charter of Human Rights and Responsibilities Act 2006 (The Charter)	CHARTER OF HUMAN RIGHTS AND RESPONSIBILITIES ACT 2006 (austlii.edu.au)
NDIS	National Disability Insurance Scheme (NDIS)

Definitions

The definitions for common terms used in this guide are set out below.

Term	Definition
Accessibility modification	Home modifications that help older people and people living with disability to safely access and use areas of the home. Modifications may include custom-built changes to the structure, layout, fixtures, or fittings. For the purposes of this document, accessibility modifications include assistive technology.
Assistive technology	Equipment, technology and devices that help people with disability do something more easily or safely, designed to improve



	daily life and help them to do everyday things.
Disability	People who have long-term physical, mental, or sensory impairments, which impacts their full and effective participation in society on an equal basis with others.
National Disability Insurance Scheme (NDIS)	A government funded program that provides funding and connections to support services to eligible people with disability and their families.
Occupational therapist (OT)	Licensed health care professionals who assist people with health issues or disability that impact their ability do daily activities. OTs help people gain independence through therapeutic activities, assistive technology and environmental modifications.

Background

A renter living in community housing has the right to:

- Live as independently as possible;
- Request the rental provider's consent to make modifications to the property;
- Request that the rental provider completes modifications at their cost (note: only approved in certain circumstances as outlined in this guide).

What are accessibility modifications?

Accessibility modifications are changes to the structure, layout, fixtures, or fittings of homes of older people and people living with disability to enable safe access and comfortable movement.

Accessibility modifications are typically prescribed by an occupational therapist (OT) or other medical professional specialising in accessibility modifications and are designed to support a person's ability to live independently and/or move safely at home.

Accessibility modifications may also help to reduce risk of injury to carers and care workers.



Request for modifications

The types of information required from renters to assess their request for modifications may include:

- A completed accessibility modification request form;
- Details of any previous modifications they have made to the property;
- Supporting information, evidence and reports from an occupational therapist (OT) or other suitably qualified medical professional;
- Plans and permits for the modifications;
- Details of other funding available to contribute towards the modifications;
- Details of relevant advocates or support workers the renter is currently working with.

The renter does not have an occupational therapist or funding

Where the renter does not already have an OT, or access to funding, CHOs should:

- Speak with known supports;
- Make referrals where appropriate – refer to the [support services directory](#);
- Make referrals for funding – refer to [assisting renters with funding for modifications](#);
- Follow up referrals to ensure the renter has successfully engaged with supports.

Assessment considerations

Human Rights considerations

CHOs must consider the renter's human rights as part of the assessment process when deciding whether or not to approve modifications.

The Charter of Human Rights and Responsibilities Act 2006 (The Charter) sets out the basic rights, freedoms, and responsibilities of all Victorians.

The following must be considered for renters with disability:

- [Recognition and equality before the law \(s8\)](#). Everyone is entitled to equal and effective protection against discrimination, and to enjoy their human rights without discrimination. Renters are entitled to fair and consistent treatment by CHOs, and for decisions to be made without undue discrimination. Section 6 of the Equal Opportunity Act 2010 sets out certain attributes which must not be discriminated against.



Other considerations

CHOs should consider the renter's personal circumstances, current state of the tenancy, suitability of the property, and the renter's connection to their local community, when forming a decision regarding modifications. Considerations include:

- Was the allocation to the property appropriate at the time? Was disability disclosed and then matched to the allocated property? (Note: There is no requirement for a renter to disclose disability prior to allocation).
- Has the renter developed disability since moving into the property?
- Does the renter requiring modifications live at the property full time and will they continue to reside there long-term?
- Is the tenancy currently at risk? (e.g., rent arrears, breach, VCAT action etc.)
- Is the property structurally suitable for the proposed modifications?
- Would moving to another property cause hardship to the renter?
- Is the renter connected to the local community for other needs? (e.g. infrastructure, medical etc)?
- Is a transfer to another suitable property a more appropriate option?
- Is the renter willing to consider a transfer?
- Have other accessibility modifications already been trialled or deemed inappropriate?
- Does the renter have appropriate supports in place? Do they need a referral for support?
- Are the modifications considered reasonable adjustments in relation to disability of the renter where the modifications are essential and there are no reasonable alternatives?
- Is external funding available (e.g., NDIS, TAC etc.)?

Where the renter has full NDIS funding and the works have been scoped by NDIS, consent will generally be granted for modifications without an assessment being required.

Application outcomes

There are various potential outcomes and in some circumstances approval may be comprised of a combination of outcomes as outlined in the table below.

Approval type	Description
Consent only	Where the CHO provides consent only for modifications. The renter is responsible for all costs and oversight of modifications and must produce documentation that the modifications have been installed by a licenced trade. Includes circumstances where the NDIS has scoped the works and will fund the costs for modifications in full.



Hybrid funding	Where the CHO and an external provider will jointly provide funding for modifications.
CHO funded modifications	Where the CHO provides partial or full funding for modifications. This type of funding occurs in limited circumstances where: • The property is a good fit long term; • The property is structurally suitable for the modifications; • The renter needs the modifications to live independently; • The renter is likely to stay in the property long term; • Minor modifications have been trialled or are considered inappropriate; • The same intended outcome cannot be achieved by the provision of different supports; • The modifications are reasonable adjustments in relation to disability of the renter; • The modifications are essential and there are no reasonable alternatives (including other more suitable properties for transfer); • No external funding is available; • The CHO will not suffer unjustifiable hardship in relation to funding the modifications. Where approved, a separate contract detailing the funding amounts, scope of works, timelines, trades, and ongoing maintenance obligations, should be provided to renters prior to any commencement of works.
Modifications denied	Where the CHO denies the request for modifications. Detailed reasons for why the request is denied should be provided to the renter.
Further information required	Where the CHO is unable to complete assessment of the application due to missing or a lack of information provided. Details regarding the missing or required information should be provided to the renter.

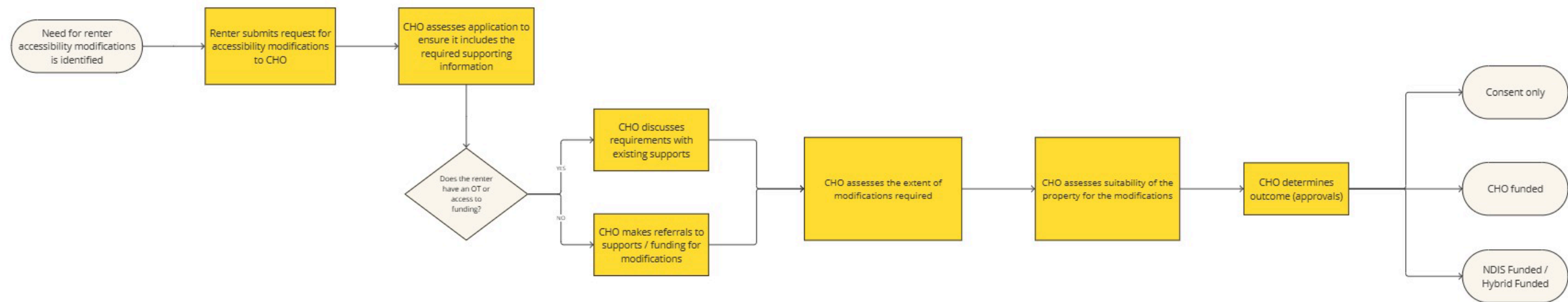
Important to note:



- Renters should be advised not to commence works to modify the property without the CHO's consent;
- Where modifications are approved but not paid for by the CHO, the renter or the funding agency will be responsible for the ongoing maintenance and costs of the modifications;
- Where modifications are approved but not paid for by the CHO, the renter or the funding agency will be responsible for the cost of removing modifications and restoring the property to its previous condition upon vacating, unless otherwise agreed to;
- CHOs should establish an Accessibility Modifications Policy which provides detailed information regarding modification funding;
- CHOs should establish an Accessibility Modifications Assessment Tool or similar, for assessing applications for modifications.



Accessibility modification process



Assisting renters with funding for modifications

Check with renter

- Is the renter already receiving support?
- Is the renter connected with any service providers or advocacy organisations?
- Does the renter require any assistance with translation or interpretation?
- Discuss any relevant support options and goals with the renter.

CHO responsibilities

- Identify potential eligibility and funding providers;
- Outline renter rights and CHO responsibilities;
- Promote the benefits of support services;
- Refer renters to relevant information;
- Refer renters to support services (preferably based on existing connections);
- Work with service providers and coordinators;
- Assist renters in providing necessary evidence;
- Make appropriate housing modifications.

Understanding eligibility

- **National Disability Insurance Scheme (NDIS)** if the renter is an Australian resident aged between 7-65 and has a permanent significant disability requiring support.
- **Commonwealth Home Services Programme (CHSP)** if the renter is over the age of 50 or over is Aboriginal or Torres Strait Islander and over the age of 45, diagnosed with a medical condition or reduced mobility, experienced a change in family care arrangements or experienced a recent fall or hospital admission.
- **Transport Accident Commission (TAC)** if the renter requires accessibility modifications due to transport accident injuries.
- **WorkSafe Victoria** if the renter requires accessibility modifications due to workplace injury.

Support referrals

After identifying potential eligibility, community housing organisations should provide information and referrals to occupational therapists, funding providers, support and advocacy organisations.

Supporting evidence

- In some cases, community housing organisations may be asked to provide evidence of renter's functional limitations and support needs.
- Before preparing any evidence, contact the renter, Local Area Coordinator or any support workers to assess what information may be useful and relevant.



Working with service providers / coordinators

Community housing organisations may be requested to provide further information relating to properties and assist service providers and coordinators to complete modifications.

Roles and responsibilities in relation to agreed modifications should be clearly outlined.

Community housing organisations may consider partnerships within the community housing sector to share resources relating to accessibility modifications or arrange mutual property transfers.

Ongoing repairs & maintenance

- Some funding providers may fund repairs and maintenance;
- Agreement must be reached before works commence;
- If modifications are deemed the property of the CHO, maintenance and repairs become part of existing asset maintenance processes

Support services directory

Disability advocacy

- [Action of Disability within Ethnic Communities \(ADEC\)](#)
- [Disability Advocacy Network Australia](#)
- [Disability Advocacy Victoria \(DAV\)](#)
- [Disability Advocacy Resource Unit \(DARU\)](#)
- [National Disability Services \(NDS\)](#)
- [Self Advocacy Resource Unit \(SARU\)](#)
- [Victorian Advocacy League for Individuals with Disability \(VALID\)](#)
- [VALID list of Victorian advocacy organisations](#)
- [Women with Disabilities Victoria \(WDV\)](#)
- [Youth Disability Advocacy Service \(YDAS\)](#)

Aged advocacy

- [Housing for the Aged Action Group \(HAAG\)](#)
- [Older Persons Advocacy Network \(OPAN\)](#)

Housing advocacy

- [Tenants Victoria](#)
- [Action for More Independence & Dignity in Accommodation \(AMIDA\)](#)
- [Find a Community Legal Centre](#)



Funding providers

- [NDIS home modifications explained](#)
- [Commonwealth Home Support Programme \(CHSP\)](#)
- [Transport Accident Commission \(TAC\) - home modifications.](#)

Occupational therapists

- [Occupational Therapy Australia \(OTA\).](#)

Building contractors

- [NDIS - provider finder \(registration group - home modification design and construction\)](#)
- [Victorian Building Authority \(VBA\) - find a practitioner.](#)

Understanding accessibility modifications

- [NDIS - home modifications explained](#)
- [Home Modification Information Clearinghouse](#)
- [DIYmodify App.](#)

Assisting renters with NDIS funding

Understanding the NDIS

The National Disability Insurance Scheme (NDIS) provides individualised support for people with disability, their families and carers. The NDIS provides reasonable and necessary supports to assist participants to live an ordinary life.

NDIS eligibility

- Aged between 7 and 65;
- Live in Australia and have Australian residency;
- Require support due to a permanent and significant disability;
- Use special equipment because of a permanent and significant disability;
- Require supports to reduce future needs.

Home modifications

NDIS can assist with funding for:

- OT assessments to ascertain modifications required;
- Complex home modifications.



The NDIS will **not** fund **minor** modifications for CHO renters; minor modifications are the responsibility of the property owner.

Home modifications eligibility

NDIS participants may be eligible for home modifications if:

- Due to disability, the participant or carers cannot reasonably access and use frequently used rooms and spaces in primary residence;
- The primary residence of the participant has significant and adverse impacts on the sustainability of current living and care arrangements;
- A suitably qualified Occupational Therapist has performed an assessment and recommended home modifications considering all possible alternatives, including the use of assistive technology;
- Each support is assessed individually as reasonable and necessary.

Considerations

- Value for money compared to lower cost alternatives;
- **To what extent the property owner has already made or is willing to make minor modifications;**
- Relocation options available;
- Expected length of tenure for participants;
- Structural constraints.

Funding

Funding for home modifications is assessed based on reasonable and necessary supports assessed by a suitably qualified Occupational Therapist. A participant may receive funding through the capital budget in their NDIS plan.

What may be funded by the NDIS

The NDIS requires sufficient evidence to decide which home modification supports are deemed reasonable and necessary. NDIS complex home modifications address eight major component areas:

- | | |
|----------------------------|------------------------------|
| • Dwelling Access/Entrance | • Internal Dwelling Access |
| • Bathroom | • Home Automation |
| • Bedroom | • New Building Modifications |
| • Bedroom | • Maintenance and Upgrades |

Further information regarding [NDIS providing home modifications](#).

What may not be funded by the NDIS

Modifications that the NDIS will generally not fund are outlined in the [NDIS home modifications operational guidelines](#).



Further information

- [NDIS home modifications explained](#)
- [NDIS providing home modifications](#)
- [NDIS home modifications operational guidelines](#)
- [NDIS consultation summary report - An ordinary life at home](#)
- [NDIS requesting home and living supports.](#)

Assisting renters with CHSP funding

Understanding the CHSP

The Commonwealth Home Support Programme (CHSP) provides entry-level support for older people who need help to stay at home. Home modifications are provided to increase or maintain levels of independence, safety, accessibility and wellbeing.

CHSP eligibility

Renters may be eligible for the CHSP based on the following criteria:

- 50 years or older and on a low income, homeless or at risk of being homeless (45 years or older for Aboriginal and Torres Strait Islander People);
- 65 years or older (50 years or older for Aboriginal or Torres Strait Islander People);
- Diagnosed with a medical condition or reduced mobility;
- Experienced a change in family care arrangements;
- Experienced a recent fall or hospital admission.

Home modifications

Home modifications are categorised by the CHSP as:

1. Simple home modifications;
2. Home modifications;
3. Complex home modifications.

Home modifications are contained within the Community and Home Support sub-program, with eligibility requirements outlining difficulty performing activities of daily living without help due to functional limitations.

Home Modification providers may use grant funds to purchase occupational therapy assessments for clients to help determine specific requirements.

Considerations

Assessment and support planning is conducted by the My Aged Care Regional Assessment Services (RAS).



Service providers must comply with all relevant legislations and regulations including appropriate licences and insurances.

Funding

The CHSP predominantly funds minor home modifications below \$1,000.

For complex home modifications, justified through specialised functional assessment, funding is capped at \$10,000 and is applied per client per financial year.

What may be funded by CHSP

The CHSP will assess needs and requirements to determine modifications, examples of modifications may include:

- Access and egress pathways through a property;
- Appropriate lever tap sets or lever door handles;
- Grab rails in the shower;
- Client engagement and support;
- Installation and fitting of emergency alarms and other safety aids and assistive technology;
- Internal and external handrails;
- Ramps (permanent and temporary);
- Step modifications.

What may not be funded by CHSP

Funding will not be provided where another entity holds responsibility for structural changes to the home.

Any complex modifications that would incur a cost over the Commonwealth's capped contribution of \$10,000 must be borne by the client.

Further information

- [Commonwealth Home Support Programme \(CHSP\) Manual](#)
- [My Aged Care - apply for an assessment online](#)
- [My Aged Care - prepare for your assessment](#)
- [My Aged Care - help at home](#)
- [My Aged Care - frequently asked questions \(FAQ\)](#).

