



**ACQUIRED
BRAIN INJURY**
IRELAND

**Submission to the
Department of Housing,
Planning and Local
Government**

**Review of the Housing
Adaptation Grant Scheme**

July 2022



1. Introduction

Acquired Brain Injury Ireland welcomes the opportunity to make a submission to the Department of Housing, Planning and Local Government as it reviews the Housing Adaptation Grant (HAG) Scheme for people with disabilities. Our submission is reflecting the experiences of people with acquired brain injury and their families in accessing the HAG Scheme.

The submission provides our feedback under the headings as set out by the Department:

- Grant limits
- Income thresholds
- Application process

It also includes an additional section with key issues from our experience of working with people with acquired brain injury in communities across Ireland. The submission is informed by experts in the field of social work, occupational therapy (OT) and case management working in our community neuro-rehabilitation services.

2. Grant limits

The HAG Scheme only extends to private owner occupiers, council tenants or tenants of approved housing bodies that meet criteria. We have many clients in private rented accommodation who are restricted from accessing the full extent of grant and for whom the stairlift can be the extent of adaptation offered if the landlord agrees.

In addition, the HAG Scheme covers 95% of the full costs of the build. Therefore, the applicant has to self-fund the balance. This very often requires the applicant to take out a loan. Credit Unions are the usual and, in some cases, the only option as often our clients do not meet the criteria of mainstream banks. To get access to a loan from a Credit Union, the person must build up a 3-month saving history in expectation of a loan application. This is extremely challenging if the person's sole income is from social welfare (e.g. disability allowance), which is the reality for many of our clients. Our clients are often very reluctant to take on the burden of debt due to the demands of repayments. This can leave our clients with very limited options, and some are left with no choice but to take out a loan or forfeit the grant. It is a major source of additional stress on the person and their family who has already experienced a massive trauma in their lives and are just beginning to re-learn and re-adjust after a life-changing brain injury.

WE ADVOCATE THAT THE GRANT PROVIDES 100% OF THE BUILDING COSTS AND IS NOT PUNITIVE ON THOSE IN THE PRIVATE RENTED SECTOR.

3. Income thresholds

Many of our clients are parents and have substantial financial responsibilities for their children as well as potentially paying a mortgage/rent. The combined household income threshold of €60,000 is too low. It can have a serious impact on families who are just earning above the threshold and have significant other family expenses. For e.g. one of our social workers is working with a client with brain injury who is married to a healthcare professional and their combined income just brought them over the income threshold for HAG. (It also meant that they were over the threshold for the 3rd level SUSI grant, so they had to pay for their two children who are in university, and they had a substantial mortgage). This family has no disposable income and are experiencing poverty and are still unable to access the HAG due to exceeding the income threshold. This situation is further compounded by the current rate of inflation.

WE ADVOCATE THAT THE THRESHOLDS BE REVISED TO REFLECT THE REAL-LIFE FINANCIAL SITUATIONS OF THE PERSON WITH THE DISABILITY AND THEIR FAMILY.

4. Application process

There are several challenges that our clients face in completing the administrative elements of grant. Again, this process is extremely lengthy, burdensome, and difficult to navigate for our clients.

1. The application process requires completion of application form which many of our clients require support to complete. Without assistance, many would struggle to complete the form. Acquired Brain Injury Ireland furnish social work and OT reports to support client priority. Again, if a person isn't connected to a service such as ours, they will be disadvantaged at this early stage of the process.
2. The Council Clerk of Works then visits site and writes up the specification in conjunction with OT recommendations. The Clerk of Works does not draft plans. Client is required to get plans drawn up independently and self-fund.
3. Three builder quotes are required for the application. This places big demands on clients to source the builders in the first instance and they then have to fund the drafting of plans to support each quote (cost not covered by HAG) There can be a big difference in cost for the drawing of plans.
4. Currently builders are reluctant to give quotes as the cost of supplies are increasing weekly. Now quotes often come with a one-month lifetime. Another issue is that builders are also reluctant to wait for 3 months to get paid by Council.
5. Where planning is required, there are significant additional costs to clients to meet the submission requirements of the Council planning system. The quotes can vary widely: for e.g. one of our clients got quoted €1,100 and €2,400 by 2 different builders for the same job (i.e the preparation for

- planning process in respect of addition of a wet room to the side of an owner-occupied council house).
6. The application process also requires a Tax Clearance Certificate. The application form is available online but many of our clients need assistance with this process. An increasing challenge is that there is no provision made for non-English speakers. Applicant receives a letter by return advising that they are tax compliant. The Tax Clearance Certificate has to be downloaded from myrevenue.ie. Many of our clients are on social welfare and not registered for the online revenue portal.
 7. Applicants are also required to be Local Property Tax compliant. Where an applicant is in arrears, there is a requirement to apply for deferral or exemption which requires medical verification. This can often prolong the whole application process. This situation has proved a significant issue for clients transitioning from nursing homes after a number of years and has contributed to delays in their application process and subsequent transitioning. In addition, many GPs charge for completion of the documentation.
 8. Currently, the HAD applicant is not given any timeframe from the Council regarding a decision on their application.
 9. There are significant variations and inconsistencies in the practices among the Councils. For example, some County Councils will complete the housing assessment but in other Councils this has to be privately sourced.
 10. The form should include information on how to source a private OT service for the assessment. Clarity is also needed on when an OT assessment is required (before or after grant approval).

WE ADVOCATE THAT A FULL REVIEW OF THE APPLICATION PROCESS IS CONDUCTED IN ORDER TO STREAMLINE IT, REDUCE THE FINANCIAL AND ADMINISTRATIVE BURDEN ON THE PERSON WITH THE DISABILITY AND IMPROVE THE TIMEFRAMES FOR APPROVAL AND DELIVERY OF THE PROJECT.

5. Additional key issues

Our staff who support clients with the HAG have also experienced challenges with some other elements of the HAG scheme.

5.1 Drawdown of grant

The grant cannot be drawn down until the total works are complete and approved by Clerk of Works. However, builders currently are not willing/do not have the capacity to carry this level of financing and wait this long. Therefore, clients are required to seek bridging finance from a bank/credit union to facilitate staged payments to the builder so that they will progress the build. This leaves clients unprotected in the event of dispute between the builder and Council. This needs to be addressed urgently. **An interim approval from Clerk of Works must be considered.** Otherwise, the client is carrying the risk and costs of bridging finance. Financial institutions require the grant to be in the account 4 months post the

bridging finance agreement, otherwise penalties are imposed, and the person's credit rating is impacted.

5.2 Interplay between MAG and HAG

Clients can be considered for the Mobility Aids Grant (MAG) and HAG but they are not necessarily advised of how to maximise their options. The Council tends to consider all needs under one application and does not invite separate applications for mobility ramps etc which could increase the pot of funds available to client. One of our social workers had a client approved for a €30,000 HAG grant for the addition of wet room and bedroom downstairs. The build involved changing the access from the front to the rear of house. The client was not invited to apply separately for the MAG to cover the costs of the ramps. The social worker approached the Council and was advised client would have to supply 2 separate quotes for the adaptation and for the ramps. The builder split the quotes and the client got a MAG grant of €6,000. **Clear and precise information is required from the Council on the workings of the schemes to maximise the options open to the applicant.**

5.3 Claiming VAT

VAT can be claimed back on the build, but there is a lack of clarity as to how this is applied for and who is eligible. Not all builders are registered for VAT which provides another dilemma. Also, VAT cannot be claimed back where eligible, until the builder has paid it in the first instance. This requires the builders to have made VAT returns to revenue and this is always not the case for very small operators. **The issues around claiming the VAT back for the applicant needs to be reviewed.**

5.4 Planning process

It takes approximately 12 weeks for planning application approval. **An expedited/priority process for people with disabilities who require the basic adaptations to be made is needed.**

6. Final comments

The review of the HAG Scheme is much welcomed and necessary.

From our experience in its current form, it is extremely burdensome from an administrative point of view. Most clients need social work/OT/case manager to support them to complete the application process. There are delays at every point and this leads a delay in the person being discharged from hospital/nursing home. These delays in providing suitable accommodation also leads to a delay in the assessment/provision of rehabilitation and social care services that the person needs to live at home. All of these factors mitigate against facilitating the person's with disability returning home and the opportunity to live independently in their own community.

The review must incorporate how all the various agencies/stakeholders involved in the process interact and work together in a seamless way to deliver the housing adaptation that the person with a disability needs to live at home. There must be more streamlined, coordinated and joined up approach to improve the HAG Scheme.

Appendix 1

Supporting Information – About Acquired Brain Injury Ireland and brain injury

ABI Ireland

ABI Ireland is a dedicated provider of community-based neuro-rehabilitation services for people with an acquired brain injury (ABI) and their families. As a brain injury can affect a person's ability to manage their own life, ABI Ireland works in communities across Ireland to support and empower people to rebuild their lives. ABI Ireland also campaigns, educates and advocates for the rights and needs of this hidden group in society.

ABI Ireland Services

ABI Ireland provides a diverse range of clinically lead accredited neuro-rehabilitation services. The core services include:

- Residential rehabilitation
- Transitional living
- Day resource/clubhouse
- Home and community rehabilitation
- Case management
- Vocational training
- Family and carer support services

What is an ABI?

There are many ways in which a person can acquire a brain injury. These include, among others, a fall, assault, accident, infection, stroke or tumour. People's lives can change suddenly and significantly following an ABI. Having a serious brain injury is totally life altering for both the person and their family due the effects of brain injury. The brain is a complex organ. Depending on what part of the brain is injured, and the extent of the injury, the person will have to live with different consequences. Many of these consequences may be hidden, others not. They range from physical and sensory to cognitive and psychological.

Key Facts and Figures on ABI in Ireland

- Each year it is estimated that 19,000 people in Ireland acquire a brain injury
- There are over 100,000 people living with ABI in Ireland today
- ABI is one of the leading causes of disability and can have life-long consequences for people with the condition, their carers and families.

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