

21 August 2017



Department of Health
agedcarereformenquiries@health.gov.au

Via website: <https://consultations.health.gov.au/aged-care-policy-and-regulation/discussion-paper-future-care-at-home-reform/>

Dear Sir/Madam,

Re: *Future reform – an integrated care at home program to support older Australians*

Thank you for this opportunity to contribute to the development of an integrated care at home program to support older Australians.

The NSW Council of Social Service (NCOSS) works with and for people experiencing poverty and disadvantage to see positive change in our communities. As the peak body for health and community services in NSW we support the sector to deliver innovative services that grow and evolve as needs and circumstances evolve.

Please find attached the submission template with our responses to relevant questions in the discussion paper.

If you would like to discuss any of the issues we raise in this submission in more detail, or require any further information or input, please do not hesitate to contact Ya'el Frisch, NCOSS Policy Officer (Disability and Ageing), on 02 8960 7908 or yael@ncoss.org.au.

Yours sincerely

A handwritten signature in black ink that reads 'Tracy Howe'. The signature is fluid and cursive, with a large initial 'T'.

Tracy Howe
Chief Executive Officer

Submission template

Discussion paper:

Future reform – an integrated care at home program to support older Australians

Submissions close on 21 August 2017

Instructions:

- Save a copy of this template to your computer.
- It is recommended that you read the relevant pages in the discussion paper prior to responding.
- You do not need to respond to all of the questions posed in the discussion paper.
- The numbering of the questions in the template corresponds to the numbering in the discussion paper.
- Please keep your answers concise and relevant to the topic being addressed.
- Upload your completed submission on the [Consultation Hub](#). Alternatively, if you are experiencing difficulties uploading, you can email your submission to: agedcarereformenquiries@health.gov.au

Thank you for your interest in participating in our consultation.

Tell us about you

What is your full name?

First name Ya'el

Last name Frisch

What is your organisation's name (if applicable)?

NSW Council of Social Service (NCOSS)

What stakeholder category/categories do you most identify with?

<input type="checkbox"/> Commonwealth Home Support Program ¹ service provider	<input type="checkbox"/> Peak body – consumer
<input type="checkbox"/> Home Care Package service provider	<input type="checkbox"/> Peak body – carers
<input type="checkbox"/> Flexible care provider	<input type="checkbox"/> Peak body – provider
<input type="checkbox"/> Residential aged care service provider	<input type="checkbox"/> Seniors membership association
<input type="checkbox"/> Aged care worker	<input type="checkbox"/> Professional organisation
<input type="checkbox"/> Volunteer	<input type="checkbox"/> Disability support organisation
<input type="checkbox"/> Regional Assessment Service	<input type="checkbox"/> Financial services organisation
<input type="checkbox"/> Aged Care Assessment Team/Service	<input type="checkbox"/> Union
<input type="checkbox"/> Consumer	<input type="checkbox"/> Local government
<input type="checkbox"/> Carer or representative	<input type="checkbox"/> State government
<input checked="" type="checkbox"/> Advocacy organisation	<input type="checkbox"/> Federal government
	<input type="checkbox"/> Other <input type="text" value="Click here to enter text."/>

Where does your organisation operate (if applicable)? Otherwise, where do you live?

<input checked="" type="checkbox"/> NSW	<input type="checkbox"/> SA
<input type="checkbox"/> ACT	<input type="checkbox"/> WA
<input type="checkbox"/> Vic	<input type="checkbox"/> NT
<input type="checkbox"/> Qld	<input type="checkbox"/> Tas
<input type="checkbox"/> Nationally	

May we have your permission to publish parts of your response that are **not** personally identifiable?

Yes, publish all of my response

No, do not publish any part of my response

¹ Includes Home and Community Care Providers in Western Australia

Section 2. Reform context

2.3 Reforms to date

Comments

We would welcome your views and feedback on the February 2017 (*Increasing Choice*) reforms.

Refer to page 6 of the discussion paper

Section 3. What type of care at home program do we want in the future?

3.1 Policy objectives

Question

Are there any other key policy objectives that should be considered in a future care at home program?

Refer to page 9 of the discussion paper

Section 4. Reform options

4.2 An integrated assessment model

Question

What do you believe could be done to improve the current assessment arrangements, including addressing variations or different practices between programs or care types (e.g. residential care, home care and flexible care)?

Refer to page 12 of the discussion paper

4.3.1 New higher level home care package | 4.3.2 Changing the current mix of home care packages

Questions

Would you support the introduction of a new higher package level or other changes to the current package levels?

If so, how might these reforms be funded within the existing aged care funding envelope?

Refer to pages 12 – 14 of the discussion paper

4.4.1 Changing the current mix of individualised and block funding

Question

Which types of services might be best suited to different funding models, and why?

Refer to pages 14 – 15 of the discussion paper

NCOSS emphasises the importance of social support programs continuing to be block funded. Our members tell us these programs are a vital source of support and information for marginalised older people, and that participants are provided with transport to and from activities if required. Uncertainty exists around the long-term future of group social support once budgets have been individualised. Without block funding, disadvantaged older people, including those on low incomes, are less likely to participate.

We support the position statement of our member, NSW Neighbour Aid and Social Support Association (NASSA) regarding the benefits of social support.²

Question

What would be the impact on consumers and providers of moving to more individualised funding?

Refer to pages 14 – 15 of the discussion paper

While NCOSS supports the choice and control which individualised funding offers consumers, we are concerned that social support services may not be viable unless they are block funded. Our members tell us that participants may be reluctant to pay the full costs of social support (including administrative costs) from their personalised budgets.

Question

Are there other ways of funding particular services or assisting consumers with lower care or support needs, e.g. a combination of individualised funding and block funding, vouchers etc.?

Refer to pages 14 – 15 of the discussion paper

4.5.1 Refocussing assessment and referral for services

Questions

Should consumers receive short-term intensive restorative/reablement interventions before the need for ongoing support is assessed?

If so, what considerations need to be taken into account with this approach?

Refer to page 16 of the discussion paper

Question

How could a wellness and independence focus be better embedded throughout the various stages of the consumer journey (i.e. from initial contact with My Aged Care through to service delivery)?

Refer to page 16 of the discussion paper

4.6.1 Ensuring that services are responsive to consumer needs and maximise independence

Questions

How do we ensure that funding is being used effectively to maximise a person's ability to live in the community and to delay entry to residential care for as long as possible?

For example, should funding be targeted to services or activities where there is a stronger connection with care and/or independent living? Are there examples of current services or activities that you believe should not be funded by government?

Refer to pages 16 - 17 of the discussion paper

Question

How do we maximise the flexibility of care and support so that the diverse needs of older people, including those with disability, are met?

Refer to pages 16 - 17 of the discussion paper

NCOSS is concerned that older people who acquire a disability that is unrelated to their age are not served by the current Commonwealth Home Support Program (CHSP), with its focus on the frail aged. Our members tell us that

² [NSW Neighbour Aid and Social Support Association](#). *Social Support Services: Connection and Wellbeing Beyond 2018*.

CHSP funding levels are particularly inadequate in terms of the assistive needs of people with disability. In addition, CHSP services are ill-equipped to deal with disability-specific information or assessment.

In order to ensure equitable access and outcomes, it is crucial that older people with disability who face additional barriers receive additional support.

4.6.2 Accessing services under different programs

Question

Under the current program arrangements, does allowing some consumers to access both programs promote inequity, particularly if other consumers have to wait for a home care package?

Refer to page 17 of the discussion paper

Questions

Until an integrated care at home program is introduced, is there a need to more clearly define or limit the circumstances in which a person receiving services through a home care package can access additional support through the CHSP? If so, how might this be achieved?

Refer to page 17 of the discussion paper

4.8.1 Supporting specific population groups

Question

How can we make the care at home system work better for specific population groups, particularly those whose needs are not best met through current CDC models and administrative arrangements?

Refer to page 19 of the discussion paper

NCOSS emphasises the need to ensure that the system is accessible to older people from marginalised communities, including Aboriginal and Torres Strait Islander people, and people from culturally and linguistically diverse communities.

Our members recommend the Commonwealth take the following actions to increase accessibility to people from marginalised communities:

- Develop linkage services to provide information and facilitate entry into the aged care system for older people from marginalised communities. These services should be block funded and delivered at a local level by organisations with proven experience in working with marginalised communities.
- Offer one-on-one support to older people from marginalised communities accessing aged care services, including supported referrals to My Aged Care.
- Provide additional funding for specific information sessions to older people from marginalised communities and their supporters.
- Ensure the viability of the necessary specialist services for diverse populations.

It is also important that Sector Support and Development roles be extended past 30 June 2018, to enable services to increase their responsiveness to older people from marginalised groups.

4.8.2 Supporting informed choice for consumers who may require additional support

Question

What additional supports could be considered to ensure that people with diverse needs can access services and make informed choices and exercise control over their care?

Refer to page 19 of the discussion paper

4.10 Other suggestions for reform

Question

Do you have other suggestions for care at home reform, or views on how changes might be progressively introduced or sequenced?

Refer to page 20 of the discussion paper

Section 5. Major structural reform

5.2 What would be needed to give effect to these structural reforms?

Question

Are there other structural reforms that could be pursued in the longer-term?

Refer to page 21 of the discussion paper

Section 6. Broader aged care reform

6.1.1 Informal carers

Question

How might we better recognise and support informal carers of older people through future care at home reforms?

Refer to page 22 of the discussion paper

6.1.2 Technology and innovation

Question

How can we best encourage innovation and technology in supporting older Australians to remain living at home?

Refer to page 22 of the discussion paper

Question

What are the existing barriers, and how could they be overcome?

Refer to page 22 of the discussion paper

6.1.3 Rural and Remote areas

Question

How can we address the unique challenges associated with service delivery in rural and remote areas?

Refer to page 22 of the discussion paper

Question

What other service delivery and funding models could we consider for providing care at home services to consumers living in rural and remote areas, including examples of innovative local community models?

Refer to page 22 of the discussion paper

6.1.4 Regulation

Question

How can we further reduce regulation to allow for innovation while ensuring that essential safeguards remain in place?

Refer to page 23 of the discussion paper

6.1.5 Aged care and health systems

Question

What are some examples of current gaps or duplication across the aged care and health systems, and how could these be addressed?

Refer to page 23 of the discussion paper

Any further comments?

Other comments

Do you have any general comments or feedback?