



Submission to the
Department of Health Discussion Paper

Future Reform – an integrated care at
home program to support older people

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About COTA Australia

COTA Australia is the national consumer peak body for older Australians. Its members are the State and Territory COTAs (Councils on the Ageing) in each of the eight States and Territories of Australia. The State and Territory COTAs have around 30,000 individual members and more than 1,000 seniors' organisation members, which jointly represent over 500,000 older Australians.

COTA Australia's focus is on national policy issues from the perspective of older people as citizens and consumers and we seek to promote, improve and protect the circumstances and wellbeing of older people in Australia. Information about, and the views of, our constituents and members are gathered through a wide variety of consultative and engagement mechanisms and processes.

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Permission is provided to publish the full response of COTA Australia.

Introduction

COTA Australia welcomes the opportunity to comment of the Department of Health Discussion Paper “Future Reform – an integrated care at home program to support older people”.

COTA Australia has been at the forefront of advocating for a radically improved aged care system for older Australians prior to and throughout the reform processes. The melding of the Commonwealth Home Support Program (CHSP) and Home Care Packages (HCP) program is an essential step in a fully integrated consumer driven aged care sector. While COTA Australia understands the reasons for the extension of the timeframes to achieve this from mid-2018 to mid-2020, we remain concerned that this means that tens of thousands of older Australians will have to continue to live with less choice and control over their aged care than the government has agreed is optimal. COTA Australia urges the Government to increase the momentum of reforms necessary to deliver a fully consumer driven aged care system across the whole spectrum of support and care.

COTA Australia commends the continued focus on wellness and reablement. An aged care system that focuses on the strengths of consumers rather than deficits will deliver longer term benefits for older Australians, the community, and government.

COTA Australia is a strong advocate for the introduction of a suite of supports to assist consumers to navigate and manage their engagement with the aged care system, as outlined in the National Aged Care Alliance’s paper “Integrated Consumer Supports”, July 2017¹.

¹ National Aged Care Alliance (July 2017) ‘Discussion paper: Integrated Consumer Supports’. Available from: <http://www.naca.asn.au/publications.html>

Reform Context

Reforms to date

COTA Australia acknowledges the work undertaken in aged care reform to give consumers greater choice, control and quality. The delivery of a single support at home program that substantially integrates the Commonwealth Support at Home Program (CHSP) and the Home Care Program (HCP) will be a major step in the right direction to a fully integrated consumer driven aged care system.

Given the delay to the original intention to create a single home care system by 2018, COTA Australia strongly urges the Government to accelerate the momentum of reform to address the issues that must be resolved to complete the merger by 2020. Older Australians are looking forward to having greater control and choice across all aged care which is offered by the shift to an integrated system.

Aged care reform has progressed to a point where the only viable way forward now is to continue the momentum toward an aged care system described in the Aged Care Roadmap developed by the Aged Care Sector Committee. The delivery of an integrated support at home program is the opportunity for government to leave a positive legacy of consumer driven change that will impact positively on millions of older Australians and their families for decades to come.

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

Policy Objectives

COTA Australia supports the policy objectives outlined on page 9 of the Discussion Paper. Older Australians want to be seen as valuable contributors to the community. A system that values the contributions of older Australians and recognises them as individuals is essential. Actively engaging older Australians and their families to plan for their care needs into the future is essential to a well-functioning and engaging aged care system that focuses on wellness and reablement.

Older Australians want to see a system where the consumer is in control. A system which is flexible, services are timely and consumers are seen as individuals who want to stay well and independent. The COTA Australia Consumer Engagement in Aged Care project consultations established that consumers want to access services and supports that they want and need, at the time they are needed and in a place of their choosing.

Reform Options

An integrated assessment model

COTA Australia supports the position of the National Aged Care Alliance for a government funded assessment service that is free for all consumers, operates independently of providers and delivers consistent outcomes everywhere in Australia. COTA Australia has strongly argued for a nationally consistent assessment solution through the My Aged Care Gateway throughout the reform process. COTA proposed the Aged Care Gateway to the Productivity Commission Inquiry, although on a much more robust and consumer accessible basis than government originally introduced. The integration of My Aged Care, Regional Assessment Services and Aged Care Assessment Services to form a single assessment workforce will deliver reliability and consistency of experience and choice for consumers.

Older Australians are experts in their own lives and have reiterated that they want to be seen as valuable contributors to, and partners in, the assessment process. They want skilled assessors who have a range of skills, knowledge and experience to understand individual needs and the foresight to engage other key people including carers.

Older Australians want a streamlined assessment process that is smooth and consistent where they do not have to repeat their story. This service must be as responsive to crisis as it is to chronic, changing and increasing needs and where the questions that consumers have, such as:

- What can I expect from the assessment?
- How long will I be waiting?
- Where am I on the waiting list?
- What happens if my needs change?
- What happens if things go wrong?

are easily answered and communicated to consumers and provide clarity to consumers.

New Higher level homecare package | Changing the current mix of home care

The introduction of a higher level package must be considered in the context of broader reform of the aged care system that includes residential aged care. In the context of a care continuum, the value of the service package should ignore the care setting. Thus, the number and value of packages would best be considered in the context of a single program identifying the lowest level of service value that constitutes “package” and then the highest level. The highest level of service package should correlate with the cost of the highest level of care in residential aged care settings. COTA also believes the dollar value differential between package levels should be consistent and not too large.

Older Australians have consistently told us that they want to stay at home for as long as possible and remain independent. COTA Australia supports the review of the planning ratios to better reflect and effectively support the desire of older Australians to stay at home. With a focus on providing early intervention, staying well, independent and supporting reablement, consumers can avoid or delay more expensive hospital and residential care.

The number and mix of home care packages should be responsive to the needs of older people as determined in the single assessment process. The potential cost of not receiving the care needed when needed can contribute to a significant burden on the health budget or increase the cost and demand on residential aged care.

Any review of packages in terms of numbers and value must include the following considerations:

- Allowing easy movement between package levels with changing need
- Provide for short term episodic restoration, reablement and support
- Provide for low level social interventions and supports that are preventative

The review of the mix and funding levels of packages should consider consumer contributions. COTA Australia is supportive of consumers contributing towards the cost of their care and has long argued that people receiving the same levels of support who have the same means should pay the same fees and charges regardless of where they live and who delivers their services. Hardship arrangements should also be uniform, as socio-economic disadvantage should not preclude people from obtaining the services they require, particularly if the absence of services leads to more costly interventions in the longer term.

Changing the current mix of individualised and block funding

COTA Australia strongly supports individualising service funding. A more individualised approach to service delivery will create the opportunity for development of a better choice of providers and between providers than is currently available in the sector. True choice implies not only the selection of Provider A over Provider B, but the ability for the consumer to, as far as possible, choose the type of service, individual care giver, delivery hours, delivery site and more, that meets their needs and preferences and fully supports their individual wellbeing. Services such as personal care, nursing, domestic assistance, and allied health delivered individually and based on the assessed need of the individual consumer should be subject to individualised funding. The choice of how to utilise their care budget in terms of services and providers to meet needs will then be the choice of the consumer.

In the move towards more individualised funding in a more market based system consumers must be supported. Far too many consumers continue to report to COTA Australia that they are unable to exercise significant choice and control of their aged care services, with many expressing the view that they feel unsupported or uninformed to navigate what remains a complex system of services and supports. COTA strongly advocates the need for initiatives to better inform and support consumers about their choice and control of services.

COTA Australia is prepared to support block funding for specific services and in specific circumstances, subject to conditions that ensure that the services so funded actually respond to and meet consumer needs and preferences. This could, for example, involve the use of vouchers. Block funding may be a valuable tool in remote areas and for consumers with specific needs where the block funding model can be shown to benefit individual consumers, and also supports the development and capacity of communities. The individual consumer, community and aged care sector benefit from block funding a service such as social support for vulnerable populations.

COTA Australia has strongly advocated that the response for remote services will need to be much more flexible and focused more on outcomes than process. Individualised funding may not be viable or workable, or may need to be adapted to a different familial and community context, but this should not impact on the rest of the system and should not dilute the premise of consumer control and choice as the default position.

There is another issue that needs to be addressed in the funding model. Consumers must have clarity and transparency about the cost of what they are purchasing. COTA Australia's position is that all providers must use unit costing of services as the only sound and consistent way for price comparison of the same service between providers. Being permitted to charge for an undefined and differently calculated "administration" is resulting in confusion, price manipulation and lack of transparency. Both Package Management and Case Management can be unit priced and compared, and all other services should be unit priced with all organisational overheads included in pricing, as is the case with any other business.

Refocussing assessment and referral for services

A focus on short term restorative and reablement intervention is strongly supported by COTA Australia. Older Australians have said that this type of approach is essential and should be at the foundation of the new care at home program. Access to a package of restorative care should be the first service that most older consumers access. Even if assessed for longer term services, a restorative package of services may prevent the need for a longer-term package or more expensive residential care or hospital admission.

In focussing on restoration, timely, skilled and responsive assessment is a key. Assessors must be trained in the orientation and language of restoration, wellness and reablement. A focus on asking questions that focus on strengths and capacity of individuals rather than deficits will drive a restorative and wellness approach. Whilst consumers should be "in the driver's seat" as they are experts in their own life, assessors should have the skills and experience to guide discussions. In recent consultations, older Australians have told us that assessments have focussed on the services available, rather than on the need of the individual. Such an approach is neither consumer driven nor does it get to the heart of wellness and reablement. This requires a shift in the assessment model and significant effort on workforce development.

The concepts and language of wellness and reablement must permeate the literature and advertising collateral for the new care at home program. There are currently inconsistencies between the CHSP and HCP that must be addressed when the programs are amalgamated.

Supporting the desire of older Australians to stay at home living independently and well for as long as possible can only be aided by applying a restorative focus on assessment.

Ensuring that services are responsive to consumer needs and maximise independence

Human services are not simple exchange markets and it is COTA Australia's view that the role of government should remain central in any delivery model for aged care to ensure safety, acceptable quality standards, and equitable access by all parts of the target population.

COTA is well aware of the risks to some older Australians associated with the establishment of new service delivery markets in the disability and aged care sectors. Bringing together new market players and a significant proportion of vulnerable consumers with more power over purchasing decisions in these sectors could create exploitative, substandard or inappropriate service relationships if not well supported by government. In aged care the relevant regulatory and quality regimes must be maintained and improved in a move to a market based system.

COTA Australia strongly supports the development of a range of 'integrated consumer supports', as outlined in the National Aged Care Alliance's discussion paper², to empower consumers, improve understanding of the aged care system and assist consumers to access the services they need. The Aged Care Roadmap recognises that, to achieve the consumer destination, the system will require advocacy and support services funded by government. Consumers are also a valuable resource and their input should be harnessed at a service and policy level. To enable a more consumer demand driven model, older people and their carers need to be actively involved at all levels in the development of an inclusive responsive and appropriately accessible aged care system.

Accessing services under different programs

COTA Australia recognises that currently, in some circumstances, packages do not adequately fund the services required to meet consumer needs and that individuals access services from other programs to meet clinical and service needs. Consumers should not be disadvantaged by current artificial barriers within the service system, penalised for shortfalls in funding or poor design of services. The design of the new care at home program must take the discrepancies in the current system into account.

The Productivity Commission Report 'Caring for Older Australians'³ emphasised that consumers should receive services from the system that best meets their needs, whether disability, health (including primary health and health care homes) or aged care.

Supporting specific populations

Older Australians needing aids and equipment, assistive technology and home modifications

Older Australians requiring aids, equipment, assistive technology and home modifications to ensure they can stay at home safely, regardless of whether their services are provided within CJSP or HCP funding, are currently disadvantaged compared to people with similar needs in the NDIS. COTA Australia supports the National Aged Care Alliance's call for standardised eligibility, access and co-payment requirements for State and Territory aids and equipment schemes.

The best opportunity for improvement in access and affordability of aids and equipment for all Australians is the establishment of a new, federally funded national aids and equipment/assistive technology and home modifications scheme with harmonised eligibility, access and co-payment requirements across all jurisdictions and support systems.

Carers

Consumers and their family and friend carers require consistent, appropriate and timely access to respite services and report this is not the case across CHSP and HCP. COTA Australia supports the call from Carers Australia for an integrated care at home program to ensure that consumers and carers are supported in the most appropriate way through the most appropriate funding stream.

People who are homeless or at risk of homelessness

COTA Australia supports the continuation, and even expansion, of the Assistance with Care and Housing stream of CHSP as it provides an effective service response for the most vulnerable people who are hard to reach and have limited access to other components of the aged care service system.

² ibid

³ Productivity Commission 2011, Caring for Older Australians, Report No. 53, Final Inquiry Report, Canberra available at <http://www.pc.gov.au/inquiries/completed/aged-care/report>

Older People with Sensory Impairment

COTA Australia receives a great deal of feedback from people with sensory impairments such as low vision and hearing loss who struggle with to achieve appropriate access and supports through telephone and online avenues. COTA endorses the National Aged Care Alliance's 'Integrated Consumer Support'⁴ paper which proposes solutions that will enable older Australians such as these to get access and support tailored to the needs.

The Aged Care Sector Committee's Diversity Framework and Action Plans

COTA Australia supports the Aged Care Sector Committee's (ACSC) development of a Diversity Framework, due to be released by the end of 2017. The Framework is being designed to assist Government, peak bodies and providers to offer more appropriate services to improve outcomes for older people with diverse characteristics and life experiences, along with their families, carers and representatives. Development of action plans for the first three diverse populations, people from CALD communities, Aboriginal and Torres Strait Islander peoples and communities, and LGBTI elders, is under way. COTA Australia highlights the need to continue beyond these first three target populations with a commitment to develop action plans for other diverse groups.

Supporting informed choice for consumers who may require additional support

COTA welcomes the National Aged Care Alliance's call for consumers to be better informed about the aged care system and specifically its endorsement of COTA's call for integrated consumer supports. Unless such plain English information is provided and independent provider information is given, we are unlikely to see consumers supported into a cultural shift of customer-service focused complaints.

COTA draws attention to the Alliance's discussion paper on integrated consumer supports⁵, based on COTA's initial call for a "Consumer Support Platform". The paper outlines the various elements of consumer support that will assist consumers in feeling empowered to navigate and improve the aged care system. Older Australians have told us that they want more than online and telephone information, especially in the first instance. Face-to-face contact is highly valued, and a shopfront model as part of the Aged Care Gateway is highly favoured, with suggestions of using existing infrastructure and mechanisms such as Medicare offices.

Case management is still seen as a valuable tool and viable option for supporting consumers to help navigate the aged care system. Older Australians who are familiar with and have had access to case management in the past have commended the service for the outcomes and clarity it can deliver, particularly in times of crisis or where the consumer has specific needs.

Other suggestions for reform

While COTA Australia supports the ongoing enhancement of My Aged Care as a digital and telephone platform, and indeed a major boost to that capacity is required, we have always advocated for My Aged Care to have face to face capacity for those older Australians whose needs are not served by the reliance on technology solutions. Consumer choice and control relies on system and service access in ways that consumers want.

⁴ National Aged Care Alliance, op cit.

⁵ ibid

Major structural reform

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

COTA Australia reiterates its previously held position from the 2017-18 Federal Budget Position Statement and requests the Government to proceed expeditiously to:

- Set a legislated timetable for placing most home care and all residential aged care funding in the hands of consumers and their families, as has occurred from 27 February 2017 for Home Care Packages (the smallest part of the aged care system)
- Set a timetable to remove the cap on subsidized aged care funding and make funding available to care recipients at their assessed level of need, so that people assessed as in need receive timely access to fully appropriate levels of support and care
- Commence the funding and implementation of a set of Integrated Consumer Supports (or Consumer Support Platform), so that there is a systemic approach to providing people with access to both peer and professionally provided linkages, information, advice, assistance and advocacy to enable them to be empowered participants in the aged care system
- Development and implementation by 1 July 2018 of a fair and sustainable pricing framework for aged care, including a coherent, equitable and transparent user contributions regime, so that aged care is paid for by both government and users according to their capacity to pay, on a basis that is sustainable for both; and
- Provide the funding required to strengthen My Aged Care to become a fully functional and consumer-friendly and enabling website and back- up contact centre, with greater comparative capacity.

Broader aged care reform

Informal carers

COTA Australia recognises the importance and contribution of carers. Older Australians have told us that they want services that support and work in partnership with carers. At this point in time, the Integrated Plan for Carer Support Services has not been funded and to meet the aspirations of carers the Plan must be met. In the absence of funding for the plan, older carers must be given consideration within the aged care sector and supported as individual consumers to support their respite, information, counselling and support needs.

Technology and innovation

COTA Australia recognises the potential value and benefit of assistive technologies in the aged care sector. However, any approach that utilises technology must take into account the needs of the individual consumer and their preferences in introducing and using assistive technologies.

The establishment of a national aids and equipment program should be a priority for COAG. A program with consistent eligibility, access and co-payment requirements would streamline service and reduce current inconsistency and confusion for consumers.

The Digital Inclusion Index Report 2017 released in August 2017 supports the case for face to face and non-digital consumer supports and the section on older Australians (see p. 14), highlights the differences that exist among those who are over 65.⁶

⁶ <https://digitalinclusionindex.org.au/wp-content/uploads/2016/08/Australian-Digital-Inclusion-Index-2017.pdf>

Whilst the introduction of the My Aged Care Gateway has contributed to the streamlining of information, the platform on which it is delivered, that is on line, is a barrier to access to aged care services. Older Australians are still reporting the following issues on a regular basis:

- **Lack of printed information** – It is regularly reported to the COTA Federation through the Peer Education participants and other sources that the ‘old old’ and ‘frail old’ cohorts who are most likely in need of care and support do not easily access information through the internet. There is very little printed material available in the community to assist people starting their navigation of the aged care system.
- **Reluctance to speak to a call centre** – The same cohort has a reluctance to speak to a Call Centre, and are fearful that they will be greeted by an automated voice, someone from an overseas call centre, or asked to press 1,2,3. This fear is relieved with information about the Call Centre, and is often further enhanced by other participants in the information session who share their experience. Greater promotion of these experiences would help overcome their apprehension.
- **Request for face to face information** – COTA Australia receives regular requests for face to face information via our peer education services and a variety of other sources. These requests come from community groups, service providers and networks to provide speakers at events to inform audiences on the changes to aged care and how to access the system. Participants report they have increased confidence in understanding the system and knowing how to access care and support when needed; and that they will pass the information on to others. Requests from service providers include those seeking support to educate and re-orientate their frontline staff on the shift to Consumer Directed Care and the Wellness and Enablement/Reablement approach. While COTA Australia provides as many occasions of service as possible, we are limited in the quantum of services we can deliver due to scarce resourcing of this sort of services.

Rural and remote areas

COTA Australia recognises the complexity of service development and delivery in remote areas that may necessitate a different approach to meet consumer need. Whilst strongly supporting individualised funding as the way forward to give choice and control to consumers, there is merit in maintaining block funding for remote specialist services such as respite, nursing and allied health in Aboriginal communities.

We also recognise that providers in rural and remote areas face additional and extraordinary costs in providing aged care, and that it is inequitable for consumers to bear those additional costs when funding is individualised. COTA believes that services to individuals should be equitable across package or program streams regardless of where people live, and supports the development of innovative and creative solutions to ensure sustainable service provision across the full spectrum of care at home services.

Regulation

The Australian Government is committed to the quality of care of older people and considers the health, safety and welfare of aged care recipients a high priority. Consumers will be the major beneficiaries of the reforms to quality within the aged care system. Regulatory reforms as the government develops an end-to-end, market-based system with the sector where the consumer drives quality include a Single Aged Care Quality Framework (single quality framework) with:

- a single set of aged care standards for all aged care services
- a streamlined approach for assessing provider performance against quality standards
- improved information on quality to help consumers to make choices about the care and services they need.

The single quality framework will:

- increase the focus on quality outcomes for consumers
- recognise the diversity of service providers and consumers
- simplify regulation and reduce effort for providers by:
 - minimising duplication between the standards, other provider responsibilities and other legislation and
 - streamlining the way provider performance is assessed and monitored against quality standards.

Aged care and health systems

Older Australians are also consumers of services provided by the health, disability and community sectors. They are often engaged in multiple service systems at one time and may require multiple transitions. Consequently, the interface between these sectors must not become a barrier to access. A holistic design of aged care services must consider the needs of older people for health, disability, palliative care and community services as well as ease of access to other relevant programs and transition between service settings. COTA Australia supports the development of a specific co-design strategy to address these issues as they arise.

Any further comments

Workforce considerations

Older Australians have been clear in their feedback to COTA Australia that they envisage an aged care system with a respectful and skilled workforce. The challenges of future growth in the aged care sector and intensifying competition for workers between aged care and disability sector must be addressed to deliver the viable and sustainable service system that Older Australians deserve. Government must work with the sector to grow the capacity and capability of a future aged care workforce to meet the changing needs of Older Australians.

Older Australians have also identified the support and development of non-aged care frontline workers as a priority. These people are at times a key point of contact for isolated older people and often lack information about the aged care system. They identify the person has no supports but do not have information on aged care and support to know how to help. The sorts of workers that could be included based on the suggestions provided to COTA Australia from participants in our peer education services include ambulance workers (for example a person falls at home but does not require hospitalisation; however a paramedic identifies the person could benefit from care); volunteers in communities who deliver meals through Meals on Wheels; rural/regional taxi drivers (example in rural town of older taxi drivers who assist older single people to carry their shopping inside; MOW and transport workers); pharmacists, newsagents, postal outlet workers, hairdressers; public housing support workers and general practitioners and GP Practice Managers.