

Department of Social Services

Email: aged.care.legislation@health.gov.au

To Whom It May Concern

Re: The Exposure Draft Quality Agency Principles 2013 and Quality Agency Reporting Principles 2013

Thank you for the opportunity to provide feedback on the Exposure Draft Quality Agency Principles 2013 and Quality Agency Reporting Principles 2013.

We welcome the creation of a single body to monitor both residential and home care providers. From the consumer perspective, the role of the Aged Care Standards Accreditation Agency, as an independent agency, has served to reassure consumers that those residential providers offering unacceptable levels of care will be dealt, and the shift to monitoring home care outside of the Department is supported. However, we would like to see some additional changes to the way home care providers are monitored to bring the process in line with residential accreditation.

We know from consumer feedback that in general there is more satisfaction with the provision of home care services than there is with residential care and many older people would prefer to stay in their own home and receive services there for as long as possible. This is supported by the fact that in 2011-12 only 6.5 per cent of the complaints to the Aged Care Complaints Scheme were related to community care.

Therefore as the number of home care packages increases over the next ten years, along with additional HACC and NRCP funding, an increased and more robust focus on the quality of care provided in the community will be necessary to ensure the current standards of care are maintained and continually improved.

Introduction of unannounced visits for home care

The draft principles make no mention of the introduction of unannounced visits in home care. Home care providers have been monitored against the Community Care Common Standards (now the Home Care Standards) since March 2011, which only involves announced reviews. In residential care, consumers have expressed concerns about the notification of visits and have indicated a preference for unannounced visits to check the quality of care being provided and this is supported in home care. To increase transparency, consumer confidence and improve quality we recommend commencing unannounced visits in home care with the introduction of home care monitoring to the Aged Care Quality Agency in July 2014.

10% of home care recipients to be interviewed

Under the Home Care Standards it requires that quality reviewers conduct interviews with service users and/or representatives. It does not however specify the percentage of service users and/or representatives to be interviewed. We recommend that the legislation be amended to include that Quality Reviewers are required to meet with at least 10% of the care recipients of the service, or the care recipients' representatives, during the site visit to discuss the care and services they are receiving, thus bringing this in line with the residential process.

Involving consumers in the home care review process

Consumers would also like to have a more central role in the accreditation and quality monitoring process. Involving care recipients, carers or former carers as part of the assessment team would utilise their expertise as well as give consumers more confidence in the system. There are of course questions to be explored around developing appropriate training and whether consumers would be an equal member of the assessment team or play an advisory role. But involving consumers in the quality monitoring process may assist to reduce the hesitation some consumers feel in providing honest feedback about the services they are receiving to a reviewer as well as provide the assessment teams with additional information to support the review. The introduction of quality indicators will also provide an additional avenue for collecting information that consumers may not be willing to provide during an onsite visit and we are recommending that consumer satisfaction be monitored through surveys administered by the Aged Care Quality Agency.

These recommendations on consumer involvement form part of a paper that Alzheimer's Australia will be releasing on the quality of care in aged care on the 12 November. The paper also has information on consumer orientated systems overseas and will be available via our website: www.fightdementia.org.au.

In addition, we feel it is important that from 1 July 2014 the Aged Care Commissioner have the same powers to review a decision made by the Aged Care Quality Agency in relation to a Home Care Review as she currently does for a review conducted by the Aged Care Standards Accreditation Agency on a residential care provider.

Kind Regards,



Glenn Rees
CEO
Alzheimer's Australia
8 November 2013