



13<sup>th</sup> of April, 2015

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### **Submission – Commonwealth Home Support Programme - National Fees Consultation Paper**

The Illawarra Forum is the peak body working for community services and organisations in the Illawarra and the Shoalhaven. We support community organisations, promote expertise and innovation in community development, foster industry development and advocate for social justice.

For more than twenty years, the Illawarra Forum has taken a leadership role in the local community services sector, which is a major employment sector in the region, and currently consists of more than 300 organisations in the Illawarra and Shoalhaven areas of New South Wales.

The Illawarra Forum works closely with numerous organisations which provide support to vulnerable people across the region including:

- Home and community care services;
- People with disability;
- Individuals and families with multiple layers of social and financial disadvantage;
- Victims of domestic violence and sexual assault ;
- Youth work programs;
- Social housing and homelessness services;
- Community health services, including mental health and drug/alcohol services;
- Community legal centre services; and
- Community development and community capacity building programs.

The Illawarra Forum currently auspices the NSW HACC Development Officer, the HACC Development Officer (DO) Illawarra and Southern Highlands, Aboriginal Development Officer (DO), Multicultural Access Project (MAP) Officer and the HACC Training and Development Project. These positions are jointly funded by the Australian Government Department of Social Services (DSS) and NSW Department Family and Community Services; Ageing Disability and Home Care (FACS – ADHC) in a ratio of 68%:32% respectively. These positions provide significant sector support and development to the Home and Community Care (HACC) funded organisations in the Illawarra and Southern Highlands regions through:

- Improving the capacity of organisations to deliver high quality services to the target group
- Demonstrating leadership and providing professional advice and guidance
- Providing access to quality training to improve delivery of services
- Providing strategic advice and information
- Assistance with interpretation of Government policy and development of policies to assist implementation of practice
- Provide assistance with regional planning and identification of unmet needs to be fed into government planning frameworks.

As part of our remit in sector support and development and as a membership-based peak body, the Illawarra Forum supports and represents a number of other organisations in the delivery of their own sector support and development activities. Collaborative practices with local government-based Ageing and Disability Workers, other Multicultural Development Workers and the non-output

Dementia Advisory Service (DAS) worker are critical to the fabric of a successful and resilient HACC sector in the Illawarra and Southern Highlands.

This response takes into account our overall involvement in sector support and development in the Commonwealth Home Support Programme (CHSP) as both a provider and as a representative of providers. The Illawarra Forum consulted with members and service providers to develop this response.

### **General Comments**

The Illawarra Forum welcomes a consistent approach to a national CHSP fees policy. However, there is an overall feeling of disappointment in how they have been estimated. In some instances the cost is prohibitive for a pensioner and in others e.g. transport, it will be impossible for providers to actually cover their costs.

Our members felt quite strongly that a 4 month transition period is not adequate to implement the changes in systems that will be required. There is also concern that the onus to inform clients of the new fee structure will be on providers and that some clients may struggle with the change in fee structure and could perceive that the provider is to blame. This changes the dynamic and an element of trust and confidence may be lost in the provider.

We have concerns that some areas where financial hardship is more significant than other areas that the amount of fees collected may be lower. This will affect the ability of organisations in already disadvantaged communities to reinvest in service provision. With this being the case many areas will experience further disadvantage while more affluent communities will thrive.

We note that there is no provision for capping of fees under this policy. We have concerns for clients who may use low levels of multiple services, for example community transport, meals on wheels and social support. These clients, whilst requiring a mix of services, would not necessarily be eligible for a Home Care Package. Under this policy, however, they would be required to pay significant fees to different providers, which may equate to more than what they would pay on a HCP. A cap should be implemented to ensure that clients and services are not disadvantaged when the application of fees is determined.

### **Recommendations:**

- **Review and re-draft the National Fees Policy schedule taking into account the feedback provided by the clients, sector and peaks**
- **Government to launch an awareness campaign regarding the change in the programme and issue information directly to existing and potential clients.**
- **In future funding rounds prioritise and allow for providers to apply under a financial hardship provision to ensure investment in service provision in financially disadvantaged communities**
- **A cap is implemented at My Aged Care level for clients that use a mix of CHSP services**

## **Proposed Fee Schedule**

### **Attachment A**

The Illawarra Forum see a number of areas for improvement in this table. Notwithstanding the fact, that some of the fees are unfair and will be impossible to implement, they will also increase administrative burden for many providers.

### **Domestic Assistance, Personal Care, Social Support**

To ensure there is no conflict to the client centred approach underpinning the CHSP, the Illawarra Forum suggests that clients should be able to make a decision with regards to domestic assistance, personal care and one to one social support needs, regardless of fees. Suggesting that providers charge more for domestic assistance than personal care or social support, makes little sense.

For example, if a worker attends a home with the intention of providing domestic support and the client needs personal care or one to one social support instead, there should be an element of flexibility, within safe work practices, for the worker to meet the client's needs as requested.

If the fees are different, this may create extra paperwork and negotiation of more red tape than is necessary for a simple change of function.

It is not clear in this table if social support is specifically one to one or if it also includes social support groups. If it includes social support groups, then we believe that the fee for social support groups is too high and should not be listed on a per hour basis but rather per session.

Social Support Groups (Centre Based Day Care) currently charge a fee for a meal served at the centre and for transport to and from the group. It must be made clearer in this document what the fee covers and allow for providers to continue with a fair application of cost recovery on such things as meals and transport.

#### **Recommendations:**

- **The fee for Domestic Assistance, Personal Care and One to One Social Support should be the at the same rate at \$12 part pensioner and \$9 full pensioner**
- **Social Support Groups should be a separate item in this table**
- **The fee for social support groups should be charged per session, not per hour and make clear what the fee covers**

### **Home Maintenance**

There are concerns regarding no cap on maintenance. This is specifically problematic in relation to window cleaning, lawn mowing and pruning of tree branches etc. as costs for this have been known to run into thousands of dollars.

#### **Recommendation:**

- **Set a cap for provision of home maintenance**

### **Meals**

The Illawarra Forum believes that the fee for meals is set too high and may prohibit many clients from accessing adequate nutrition. It was also noted that meals for carers were not included. It is important to highlight that for many carers a meal from a provider is often the only form of nutrition they receive in a week. Often they are exhausted at the end of a day of caring to cook a nutritional meal and a provider assumes they are eating well. An example cited to us by one of our members, is of a man who is caring for his wife who has dementia, the man has significant mobility issues. Often the provider would call the house and the wife would tell them that she had cooked that day and they already had their dinner. It was only when the man and his wife came to the service for another purpose that the provider noted that he was quite malnourished. It was upon speaking with him, they realised that the wife had not been cooking but was instead quite convincing in her own belief that she had been cooking meals for them both. Providers have found that providing meals to carers as well as clients assists with family harmony and prevents family breakdown.

There is a concern if the fees stay this high then people may stop using the service which will lead to other health or welfare issues including malnourishment, hospitalisation or placement in residential care. This fee will also impact on the viability of Meals on Wheels providers and jeopardise their sustainability as they may be priced out of the market further reducing client choice. Currently people pay approximately \$5-8 per meal in our region for pre-packaged frozen meals. This includes the ingredients, preparation and packaging. If a \$9 fee is applied this would bring the delivery of this meal up to \$14-17 per meal for a full pensioner. This is obviously prohibitive and will lead to decline in the health of our ageing population.

**Recommendation:**

- **Review the Meals fee in line with the recommendations made by NSW Meals On Wheels Association in their response to the Fees Paper**

**Aids, Equipment & Assistive Technology**

We also have concerns around the costing of aids, equipment and other assistive technology. The paper proposes that, even on a full pensioner discounted fee, the consumer will be charged the full cost of the item. If this is the case, it will mean that many financially disadvantaged people will not be in a position to purchase/access necessary mobility aids and equipment.

There is concern around demarcation issues in NSW regarding access to aids and equipment through Enable NSW for people over 65 years of age. This will be exacerbated if people are expected to pay the full cost of equipment under the CHSP. By excluding people from accessing necessary equipment, not only would their physical, psychological, social and emotional wellbeing deteriorate, but the long term cost to the government would be far greater than if appropriate supports and equipment were in place from the start.

**Recommendations:**

- **Ensure that aids, equipment and other assistive technology are covered under the 'Financial Hardship' arrangement**
- **Negotiate with Enable NSW to ensure adequate access to aids and equipment through the state based program is available for people over 65 (over 50 for Aboriginal and Torres Strait Island communities)**

**Home Modification**

It appears from the schedule that a Part Pensioner discounted fee is 75% and the Full Pensioner discounted fee is 50%. We presume that this should mean that a part pensioner *pays* 75% not get reimbursed 75% and full pensioners *pay* 50%. This is confusing and needs to be made clearer in the table.

**Transport**

The Illawarra Forum found the transport fee scale concerning for providers. A definition of inner metro/outer metro and rural in town/rural out of town needs to be developed and included in the table. Currently there is too much room for interpretation and error.

These fees for individual transport over 100km are lower than what clients are currently paying. It will not be sustainable for any transport provider to follow this fee schedule as they would not even recover the cost of fuel per trip. Where the client only does a one way trip, the empty running cost of the vehicle cannot be recovered.

**Recommendation:**

- **Take advice from Community Transport NSW and current providers on an industry benchmark for appropriate levels of fees**

Thank you for the opportunity to make a submission on the Commonwealth Home Support Programme - National Fees Consultation Paper

For further information about this submission, please contact me at [simone@illawarraforum.org.au](mailto:simone@illawarraforum.org.au) or by phone on 02 4256 4333



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