



13th of April, 2015

Via email: CHSP@dss.gov.au

Submission – Commonwealth Home Support Programme Manual

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 Officers (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) workers 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

The Illawarra Forum was generally satisfied with the document and is in agreement with the principles and philosophies of the Commonwealth Home Support Programme (CHSP) as outlined in the manual.

We feel that there is a big shift in this programme which requires major culture change in the whole community services industry. This will be difficult to implement in a short period of time so we hope that the programme allows for teething issues, board/management committee awareness, staff upskilling and client understanding.

We are supportive of the quality indicators as mentioned on page 14 of the Manual. We are hopeful that the collection of information regarding them will not be onerous and will be captured in the quality review. If providers are being asked to embark on a separate exercise to do this, then big organisations might have the time and resources to promote their services in a positive light while smaller providers might struggle with internal resources to undertake this process. This may result in My Aged Care having inaccurate data and information.

More detail is also essential regarding grandfathering arrangements particularly for organisations whose core business is funded under Service Group 2. These services and clients require detailed information about the process which should include a transition out plan.

Whilst we recognise that dementia is becoming a standard practice due to the numbers of people with dementia accessing services and the ageing population, it is still quite a specialised area and this must be acknowledged.

Another gap that may arise during the transition is client/carer advocacy, a critical support requirement for people during the reforms. We understand that this is currently the subject of further review as mentioned on page 13, and we hope that it is seen to be central to any client centred system.

We also have concerns about the implications for people with disabilities when they turn 65. Will they be offered the same support as with NDIS and how will they be transitioned? We believe that people who have been using NDIS prior to turning 65 need to have the choice to continue with NDIS as they may not be able to receive the same specialised support under CHSP.

Recommendations

- **Provide information to organisations and clients that need to be supported under 'grandfathering' arrangements.**
- **Ensure timely finalisation of the Advocacy review to ensure that no clients or carers are disadvantaged under the new CHSP**

Programme Framework

Community and Home Support

Although the CHSP is not an emergency program, there are times when urgency is required, for example a client returning home from hospital and requiring meals or personal care. Providers report that they are often contacted by discharge planners at the last minute to notify that clients are being discharged that day. Procedures should be developed to ensure effective and timely communication, and thereby guarantee clients will have access to supports required at short notice with opportunity for backdated referrals from providers to My Aged Care in special circumstances.

It is not clear what amount of service provision would define 'entry level' supports as opposed to a level 1 Home Care Package. We question what differentiates eligibility for the two programs at the entry level for each. Further clarification on this is required for providers and clients. More information is also required about providing service to people who have been assessed as eligible for a package but are waiting for a package to become available as outlined on page 45. Support for CHSP providers in allocating appropriate levels of support will be required.

There is also lack of information regarding the timeframe from calling, screening, and referral when RAS refers to My Aged Care. As the sector is required to undertake quality reviews every 3 years through the Australian Aged Care Quality Agency, we would welcome further information on how will My Aged Care be monitored.

Recommendations:

- **Implement communication strategies to ensure timeliness of referrals and ability for backdated referrals in special circumstances**
- **Provide further clarification about eligibility for entry level supports and how it is different to level 1 HCP**
- **Provide support and advice to CHSP providers in allocating appropriate levels of provision to clients waiting for a HCP**
- **Establish an independent monitoring and advisory panel to monitor My Aged Care**

On page 24 of the manual, under Personal Care, we were pleased to note that Cert III in aged/community care or equivalent is desirable, not essential. This focusses on employing the right person and upskilling them to meet the needs of their clients.

There are concerns, however, regarding goods and equipment as outlined on page 33. State funded aids and equipment is difficult for people over 65 to access in NSW due to demarcation issues with Enable NSW. Work needs to be done in NSW to ensure that people over 65 have access to aids and equipment and are not disadvantaged by conflicting guidelines and eligibility criteria.

Care Relationships and Care Support

We are disappointed to note, that there was very little mention of carers beyond respite arrangements. Whilst respite is vital and we are pleased to note its inclusion in the CHSP, it is only one facet of carer support.

Service providers often deliver informal support to carers on a daily basis as the regular contact between the carer and provider elicits a sense of trust between them and carers access support in their own right i.e. receiving meals to help support the caring role. It is imperative that the health and wellbeing of carers is supported, and we recommend the timely implementation of programmes under development e.g. Carer counselling and carer information and support services for this purpose.

Recommendation:

- **Implementation of the national carer support program which ensures continuity of support to the carer throughout the aged care system**

Sector Support and Development

The Illawarra Forum is concerned that this service type has not been considered for the draft Programme Manual. Now, more than ever, sector support is vital to the on-going reform of aged care to assist organisations through the culture change required to implement CHSP, Fees and Restorative care practices.

Services funded through the CHSP will need to be supported to implement a range of new/emerging approaches:

Sector Support and Development workers have an ongoing role in supporting CHSP providers by:

- Supporting the implementation of the reablement stream and wellness approaches in aged care support
- Assisting the implementation of strength and goal focused supports delivered in a consumer directed model. This approach is new to CHSP providers. A complication to full implementation is that block funding and current out-put based reporting can be contrary to a goal focused outcome based model of support
- Building capacity to implement best practice and collaborative approaches
- Providing access to quality training
- Supporting organisations to deliver quality services to people from culturally and linguistically diverse communities and Aboriginal and Torres Strait Island communities
- Supporting organisations that rely on volunteers with training and information

And in supporting the role of State Office through:

- Assistance with regional planning and identification of unmet or emerging needs.
- Acting as a communication conduit between the Government and local providers by disseminating information and relaying service level issues.
- Interpreting policy and assisting organisations to understand and implement changes to practice.

The Illawarra Forum believes that staff under this service type should be auspiced by non-government non-provider organisations to ensure independence, trust and flexibility when working with CHSP providers. The Sector Support and Development Worker roles must be allocated based on geographic spread of CHSP providers, cultural diversity, and population density. The roles would benefit from key performance indicators to ensure a consistent approach to sector support and development, however there must be some flexibility to allow CHSP Support and Development Workers to address local and regional issues.

Recommendations:

- **Ensure auspice arrangements for CHSP Support and Development Workers are with non-government non-provider organisations**
- **Ensure a mix of sector support and development roles across regions according to geographic spread of CHSP providers, cultural diversity and population density**

Thank you for the opportunity to make a submission on the Commonwealth Home Support Programme Manual 2015

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