



Introduction

Thank you for taking the opportunity to read and consider the draft guidance material that has been developed to support providers of aged care services to meet the new aged care quality standards. We welcome your feedback.

Once completed please save and send this completed form by email to qualityagencypolicy@aacqa.gov.au

Should you require additional support to complete this form, please contact the Australian Aged Care Quality Agency via email qualityagencypolicy@aacqa.gov.au or via phone on 1800 288 025.

1. What is your email address? *(This information will not be published)*

Email:

2. Are you answering on behalf of an organisation? If so, please provide your organisation's name

Yes, on behalf of an organisation

No, not on behalf of an organisation

Organisation name:

3. Do you give consent for your submission to be published in whole or part?

Yes, I give consent

No, I don't give consent

4. Where do you live, or, where does your organisation operate?

Please select all that apply

NSW

VIC

QLD

WA

SA

TAS

ACT

NT



5. Do you have any specific suggestions in relation to the draft guidance for Standard 1: Consumer dignity and choice? If so, what are they?

6. Do you have any specific suggestions in relation to draft guidance for Standard 2: Ongoing assessment and planning with consumers? If so, what are they?



7. Do you have any specific suggestions in relation to draft guidance for Standard 3: Personal care and clinical care? If so, what are they?

8. Do you have any specific suggestions in relation to draft guidance for Standard 4: Services and supports for daily living? If so, what are they?



9. Do you have any specific suggestions in relation to draft guidance for Standard 5: Organisation's service environment? If so, what are they?

10. Do you have any specific suggestions in relation to draft guidance for Standard 6: Feedback and complaints? If so, what are they?



11. Do you have any specific suggestions in relation to draft guidance for Standard 7: Human resources? If so, what are they?

12. Do you have any specific suggestions in relation to draft guidance for Standard 8: Organisational governance? If so, what are they?



13. On a scale of 1 to 10 (1 being not clear at all and 10 being very clear) how clear is the guidance material overall?

<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6	<input type="checkbox"/> 7	<input type="checkbox"/> 8	<input type="checkbox"/> 9	<input type="checkbox"/> 10
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What would make it clearer?

14. Are there any gaps in the guidance material? If yes, what else should be included in the guidance material, to help aged care service providers to meet the draft new Aged Care Quality Standards?



15. Do you have any other feedback on the guidance material?

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If you wish to contribute more information than the feedback boxes will allow, please attach a Word document or write to us in the body of your email.

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Thank you for participating in the survey.

ADDITIONAL FEEDBACK
– DRAFT GUIDANCE MATERIALS AGED CARE STANDARDS

Feedback Provided by – Speech Pathology Australia
agedcare@speechpathologyaustralia.org.au

7. Do you have any specific suggestions in relation to draft guidance for Standard 3:

Personal care and clinical care? If so, what are they?

Speech Pathology Australia (SPA) wishes to make the following comments across sections in Standard 3

(Information currently provided on feedback form)

3.1,3.2,3.3

C (Dementia)

PG 53 Reflective Questions (ADD dot points)

- *How is the workforce supported to manage respect for dignity of risk and individual consumer choice, in the overall context of risk minimisation?*
- *How is the workforce supported to understand the individual communication needs and methods of consumers, including early signs of distress and anxiety prior to behavioural responses emerging?*

E (Nutrition and hydration)

PG 55 Supporting strategies 'monitoring changes in eating patterns or weight loss and reporting to medical professionals (ADD) *and relevant Allied Health professionals (eg Speech Pathologists, dietitians)*

PG 55 Supporting Strategies 'involve skilled health professionalsthose with nutrition related health conditions (ADD) *and dysphagia.....are assessed*

PG 55 Reflective Questions "Do staff feel confident in identifying risk including modifying menus..." - SPA does not endorse this practice and calls for the rewording of this dot point to

Do staff feel confident in identifying and reducing risk and engaging relevant health professionals to support consumers with nutrition related conditions or dysphagia, relevant to their position in the organisation

PG 55 Reflective questions (ADD dot point)

- *How does the organisation support consumers who need assistance with mealtimes, including the specific implementation of recommended safe swallowing strategies?*

F (Choking)

SPA recommends this area needs to be broadened to include the risks associated with aspiration. Specifically that 'aspiration' is added after the word 'choking' in dot points 1 and 4

Dot Point 3 - should read International *DYSPHAGIA* Diet ...

(Additional information to the current content on feedback form)

PG56 reflective questions (ADD dot point)

- *How are the individualised recommendations to prevent choking/ promote safe swallowing accessed and implemented by all staff involved in mealtime care?*

G (medication safety)

PG 57 dot point 3 'effective risk assessment and management including in response to adverse drug reactions, medication errors (ADD) *inability to swallow medications orally*, and polypharmacy

PG 57 Supporting Strategies (ADD dot point)

- Identify relevant processes to support the medication needs of consumers who cannot swallow these medications orally

3.5

SPA raises concerns expressed by members about the varied (and according to clinical standards, at times unacceptable) timelines for referral and service provision to consumers, particularly those at risk of choking and aspiration, with swallowing difficulties. For this reason, it is recommended that these standards indicate that there be some guidelines developed for common high-risk scenarios in terms of defining parameters of what constitutes "in a timely manner" used in this standard. It is recognised that these would need to be developed individually and specifically across scenarios, and SPA would be pleased to contribute information to these guidelines, particularly as they relate to response to identified red flags for swallowing difficulty.

Additionally, the following addition is recommended to the material

PG 68 Supporting strategies (ADD dot point)

- Use guidelines with clearly defined timelines for response across common deterioration events in order to more specifically define "in a timely manner"

3.6

PG 71 Supporting strategies "Good communication systems enabling the organisation's staff (...) to be aware of goals of care (ADD) *consumer care needs and preferences*

PG 72 Workforce and others experience (ADD dot point)

- *Staff and other health care providers actively seek information and incorporate information regarding consumer care, needs and preferences*

3.7

PG 73 Reflective Questions (ADD dot point)

- *How does the organisation accommodate consumer choice of provider where this differs from the organisation's identified providers?*

8. Do you have any specific suggestions in relation to draft guidance for Standard 4:

Services and supports for daily living? If so, what are they?

(Information currently provided on feedback form)

SPA is concerned re the lack of consistency in this section with the first 3 sections in terms of inclusion of overarching principles relating to communication, participation and swallowing difficulties. People with communication and swallowing difficulties access both residential and community aged care services and should be supported across environments. Specifically, the following additions are recommended for this section

4.1 PG 84 Training ' how to communicate with consumers, including those with diverse needs (ADD) *and disabilities*

PG 84 Policies and Practices (ADD dot point)

- *Evidence that appropriate formats and communication aids are used as necessary to actively promote participation and involvement of consumers with communication difficulties in development of consumer plans*
- *Evidence that the organisation makes appropriate referrals to health professionals as needed to ensure appropriate support of consumer need*

4.2 PG 86 Supporting Strategies (ADD dot point)

- *Promote reablement strategies, including those recommended by relevant Allied Health professionals*

PG 87 Consumer experience (ADD dot point)

- *Consumers with diverse or disability needs receive appropriate support to participate in providing their feedback (eg interpreters, communication aids etc)*

4.3 PG 89 Supporting strategies (ADD dot points)

- All staff access and use information within the client record when supporting consumers' needs and preferences.

Reflective questions (ADD dot point)

- *How are relevant Allied Health professionals referred to and involved in supporting independence, wellness and participation of consumers?*

4.4 Definitions of timeliness, and mention of how consumer choice of provider is respected should be included here

(Additional information to the current content on feedback form)

4.5

Where meals are provided, they are varied and of adequate quality and quantity (ADD) *and meet specialised dietary or safety requirements*

PG 95 Supporting strategies (ADD dot points)

- *Provide options for texture modified food/fluids in accordance with the Australian Food Safety Standards and the international Dysphagia Diet Standards Initiative for texture modified diets in consultation with and on recommendation from a Speech Pathologist*
- *Staff are aware of signs and symptoms of risks for choking and aspiration and how to respond to these accordingly, dependent on their respective role in the organisation*
- *Staff are aware of when there is need for a review to refer to Allied Health Professionals, including dietitian, Speech Pathologist, OT etc where eating/ nutritional difficulties are apparent*

PG 95 Reflective questions (ADD dot point)

- *Do staff have access to relevant information and education re positive mealtime assistance including for those with swallowing difficulties*

PG 97 Policies and Practices (ADD dot point)

- Evidence of monitoring of compliance with International Dysphagia Diet Initiative Standards for texture modified foods/ fluids produced