



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Thank you for taking the opportunity to read and consider the draft guidance material that has been developed to support providers of aged care services to meet the new aged care quality standards.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 *(This information will not be published)*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 Do you have any specific suggestions in relation to the draft guidance for Standard 1: Consumer dignity and choice?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 Do you have any specific suggestions in relation to draft guidance for Standard 2: Ongoing assessment and planning with consumers?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 Do you have any specific suggestions in relation to draft guidance for Standard 3: Personal care and clinical care?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 Do you have any specific suggestions in relation to draft guidance for Standard 4: Services and supports for daily living?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 Do you have any specific suggestions in relation to draft guidance for Standard 5: Organisation's service environment?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 Do you have any specific suggestions in relation to draft guidance for Standard 6: Feedback and complaints?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 Do you have any specific suggestions in relation to draft guidance for Standard 7: Human resources?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 Do you have any specific suggestions in relation to draft guidance for Standard 8: Organisational governance?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?

1

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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: Aged Care Standards Guidance Material

Resthaven has reviewed the guidance material and provide additional information to that provided against each Standard in the available, word-limited proforma.

The Australian Aged Care Quality Agency's (AACQA) role is to:

- accredit Australian Government-subsidised aged care homes
- conduct quality reviews of home care and Aboriginal and Torres Strait Islander flexible care services
- provide compliance monitoring, information and training to providers
- work with the community to promote quality care for older Australians.

The Single Aged Care Quality Framework brings together different standards into one set, applicable to a number of Commonwealth funded aged care programmes.

Resthaven has previously provided feedback about the wording of guidelines in relation to Standard 1, and we are pleased to see that much that we offered is consistent with changes. However, we can still see there are many adjustments required to the guideline material.

While we are supportive of the new standards as outlined in the consumer and organisational statements and the requirements, it is challenging to reconcile the extreme scope of expectations of providers as outlined in the draft guidance document together with the confusing and unrealistic intent of the content of this material.

There seems to be a lack of recognition that many providers are progressive, innovative and committed to providing high quality care and services.

Additional key comments about the guidance material:

- The guidelines document is so big in content that it makes it difficult to use as a "guide". It has attempted to cover every scenario which is not sensible. It should be a guidance document to assist providers in understanding and applying the standards as per the purpose of the former "Results and processes" booklet. It currently measures 166 pages of replicating statements and commentary which results in the key points being lost within the pages.
- Information is very prescriptive and may/will still be perceived to be a "checklist" for achieving compliance, rather than non-mandatory "suggestions/strategies"
- There is considerable duplication in material within more than one Standard: it appears there has not been one editor review the totality of the information. A lot of the commentary under each requirement could be consolidated and outlined in an overarching scope at the beginning of the document and not require duplication throughout: topics such as workforce training requirements, consumer choice and inclusivity in decision making (as these are givens).
- There is a risk in "interpreting" legislation. (We note that the Department has recently withdrawn Home Care Package Guidelines, indicating that the information providers should be referring to is in the legislation, and thus avoiding interpretation of legislation into guidelines). There should be more reference made direct to the legislation rather than an interpretation of legislation (this is risky).

- The guidance material risks being seen as a “text book” of best practice (unreferenced) and will need to be continually updated: rather than respecting that organisations themselves have the responsibility to seek out evidence based practice and update their processes/practices.
- There is still some overly prescriptive language in the guidelines, examples:
 - page 1 : *“Achievement of the outcomes is expected on a day to day basis and should be able to be demonstrated at anytime (not just when assessed by the Quality Agency).”*
 - Standard 7 page 127 re sufficiency of the workforce: “It is the responsibility of individual services to use Australian Government funding to make sure they have the staffing mix and numbers they require for their consumers to receive high quality care.”
- The document has specific examples and uses terminology specific to residential aged care, whereas these examples in many cases could equally apply in a home care setting.
- The written product has many inconsistencies in language and grammar.

The Standards and the guidance material apply to a range of different Commonwealth-funded programs, including residential care (24/7 care), home care (home care packages: from approx. 2 hrs/week (L1) up to approx. 20hrs/week (L4), including complex clinical care); and CHSP (including in-home care, allied health and therapy services, community based respite, and support and advocacy for people in tenuous housing situations).

However, the Standards and Guidance material do not appear to address or understand the:

- different ELIGIBILITY, ASSESSMENT and REFERRAL pathways that apply to different programmes (for example, for CHSP consumers, assessment and initial planning is conducted by the RAS, with referral for specific service type, and no flexibility for the organisation to change this in line with changing consumer needs, without referral back to RAS)
- the different level of service intensity (organisations involved for short time frames, or for periods of less than two hours/week). In most cases, the guidance material is still written as though it applies to a 24/7 residential care setting.

In the introduction, there should be an acknowledgement that the guidance material is to be applied as appropriately balanced for the intensity of the service provided. Therefore, if the service is one hour a week/fortnight (CHSP domestic assistance) or an hour appointment every six weeks (podiatry) or a short term program of four-eight weeks (reablement), or 24/7 care (residential care), the way the organisation meets the consumer’s needs (and their demonstration of this, in line with the Standards) may differ.

There is little acknowledgement of (and therefore appears to be limited understanding by the authors about) the wellness and reablement approach that is a keystone of the CHSP programme.

Resthaven is particularly concerned about the guidance material in relation to Requirement 7.4 (Page 139): “The workforce is recruited, trained, equipped and supported to deliver the outcomes required by these standards”. The supporting strategies appear to encourage a whole new level/role in the organisation, to ensure Standards are “interpreted” and “translated”. Unsure then why this Requirement exists, given Standard 8 covers “ensuring

compliance with legislative requirements and relevant standards”. Recommend this Requirement 7.4 is deleted as it is duplicative.

Given separation between governing and operational responsibilities we would have thought that “The governing body is accountable for safe and quality care and services systems”. It is imperative that all governing bodies understand the significance of this Standard and the separation of the governing function and operational function. General information in purpose and scope provide a comprehensive outline about governance, but also recognises there is no “one size fits all”. There is too much information in the preamble and much of it could be reduced and included in the definitions pages. There is a need for clear concise simple statements of what is required to meet the standard. The detail currently provided is very prescriptive and overwhelming.

Recommendation:

We recommend that the document be reviewed further, simplified and that duplication be reduced by having some common material combined in an overview section. We feel the existing Results and Processes and Practices and Processes guides, are good models that encourage reflection by organisations on how they will demonstrate compliance with the Standards.