

**Submission
No 5**

FIRST REVIEW OF THE LIFETIME CARE AND SUPPORT SCHEME

Organisation: Attendant Care Industry Association (ACIA)

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leading quality in
community services

First Review of the Lifetime Care and Support Scheme

ACIA's Submission

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Submitted by Natasha Cebalo, General Manager ACIA

Email: contact@acia.net.au

Address: Level 32, 1 Market st Sydney NSW 2000

Telephone: 02 9264 7197

1. Introduction

ACIA welcomes the opportunity to provide this submission to Upper House Committee's First Review of the Lifetime Care and Support Scheme.

2. Background on ACIA

ACIA is the peak body representing community care and support providers, including private, not-for-profit and charitable organisations. Nationally ACIA represents over 100 provider organisations, which collectively employ more than 150,000 FTE workers. ACIA also supports the disability and aged care sectors and works with government departments and authorities, including:

- State Disability Agencies such as Department of Family and Community Services, Ageing Disability and Home Care NSW, Department of Health Human Services Victoria and Disability Services QLD
- iCare NSW which includes: Lifetime Care and Support Authority, Workers Insurance, Dust Diseases Care, Self-Insurance and Builders Warranty.
- Lifetime Support Authority South Australia
- Motor Industry Accidents Board, Tasmania
- Transport Accident Commission Victoria
- Workers Compensations Schemes in multiple states
- Representation at the National Aged Care Alliance
- Department of Health
- Department of Social Services

ACIA's vision is for a community care and support industry that is known and respected as a provider of quality services. To achieve this vision, ACIA provides education, resources and support to the industry, as well as developing and administering its own quality standard and scheme (endorsed by the Joint Accreditation System for Australia and New Zealand JAS-ANZ).

ACIA seeks to be involved in the future development of policy and service reform, by bringing to the discussion our experience and expertise, including:

- Membership of over 100 provider organisations and individuals nationally, representing around 150,000 FTE workers
- Membership across the disability and aged care sectors
- Specific expertise in the delivery of support to people living at home or in supported and shared accommodation arrangements

- Lengthy provider experience of delivering individualised support according to the wishes of the individual in line with their funding
- Experience in compensable and business markets
- Experience in the development implementation and administration of quality certification systems that meets the national standards for disability services and home and community care standards (for example the ACIMSS 2008 and the ACIS 2013)
- Proven track record of engaging positively with reform processes, and working collaboratively with governments, providers, consumers and interested stakeholders.

In relation to the Lifetime Care and Support Scheme, ACIA members are primarily concerned with:

- The requirements to participate in the delivery of services under the Lifetime Care and Support Scheme;
- How providers who offer services across multiple government programs will be able to maintain quality endorsements while limiting their regulatory burden;
- Changes to Industrial relations that impact their ability to deliver services
- Ensuring quality of service to participants.

3. ACIA's Involvement in the Lifetime Care and Support Scheme

ACIA has a long history with the Lifetime Care and Support Scheme, ACIAs founding President was a member of the Lifetime Care and Support Council and was fortunate to be able to contribute significantly to the development and implementation of the Scheme. This included the development of the first Quality Standard for the Attendant Care Industry in Australia: The Attendant Care Industry Management System Standard 2008 (ACMISS 2008). ACMISS 2008 was a requirement for all approved providers who delivered attendant care to the scheme participants. Today the current President and General Manager are members on the Lifetime Care and Support Reference Group.

ACIA is proud to have had the opportunity to continue this relationship and we work closely with Lifetime Care on several initiatives. ACIA now administers the Attendant Care Industry Standard 2013 (ACIS 2013), the revised disability services standard that is currently required for all Lifetime Care providers. ACIA has also worked with Lifetime Care on several projects to support providers in delivery of service and has provided advice on tendering processes and other industry related advice as required.

4. ACIA's Involvement in other Australian Government Programs

ACIA has provided input to and worked on several State and Federal Government Schemes in the Disabilities and Aged Care Sectors.

Over the last 18 months, ACIA has worked with the Department of Social Services on the Development of the Quality and Safeguards Framework and the NDIS Scheme and Practice Standard. ACIA continues to work with the Department on roll out of the Scheme and the introduction of the Standard across Australia.

ACIA is also a member of the National Aged Care Alliance. ACIA believes that Aged Care and Disabilities services should be held to the same requirements in providing quality in service delivery.

5. ACIA's Submission to the Upper House Review

5.1 Leading Quality in Service Delivery

ACIA believes that Lifetime Care's approach to the regulation of a quality standard is the Industry Leader in Australian Government Disability Services. To date, no other State or Federal Government Scheme has put in place a quality standard at the level required by the Lifetime Care Scheme. The Lifetime Care Scheme requires that all Service Providers who deliver Attendant Care services to program participants are required to be certified to the ACIS 2013 standard. The rigour involved in completing this standard aims to ensure that service providers have systems and training in place that will enable the best possible outcomes for participants.

Lifetime Care supports Service Providers to achieve the ACIS 2013 standard through an incentive payment that contributes towards the cost of achieving certification. ACIA believes this incentive is one of the many ways Lifetime Care supports Service Providers in achieving quality service delivery and in maintaining positive outcomes for participants.

5.2 Person Centred Service Delivery

The Lifetime Care and Support Scheme focuses on the needs of the person receiving care (the participant). The Scheme always prioritises working to ensure the needs of the participant are met. This is evident in the way participant's plans are developed with the participant, in how the Scheme administration communicates and works with service providers and in the outcomes, that are achieved for participants.

By focussing on the needs of the participant the Scheme has been very successful at building the capacity of the market.

5.3 The Attendant Care Unit

ACIA believes that the development of the 'Attendant Care Unit' within the Lifetime Care and Support Authority has had a positive impact on the outcomes of the Scheme. The Unit is responsible for working directly with the approved providers on the attendant care panel in all aspects of the contract requirements to ensure the needs of a participant are met. This is achieved by giving both participants and providers a single point of contact within the Scheme. The Attendant Care Unit is particularly useful for providers when there are difficulties with the delivery of service in relation to an individual participant.

5.4 Lifetime Care Coordinators

ACIA would like to commend the work of the Lifetime Care Coordinators as well as the Scheme for maintaining this important position. The Coordinators provide a level of individual support that is important for both participants and service providers. The Coordinators create a communication channel that both builds rapport and trust with the stakeholders, and has an individual focus on costs and reasonable supports.

Other government funded Schemes have not maintained this important role. This has led to a decreased level of service delivery for participants and an increase in the administrative burden for service providers who end up filling the gaps.

ACIA would recommend that this role be maintained and supported within the Scheme.

5.5 Individualised Training to Support Participant Needs

Within the Scheme, there is provision for supporting participants via the training of support workers on specific needs of individual participants. When a participant's plan is set up with the input of a specialist provider such as an Occupational Therapist or Psychologist, Lifetime Care supports the training of support workers to understand and meet these requirements. This helps support the individual care needs of the participant and helps service providers and their support workers deliver the best outcomes to participants.

5.6 Capacity Building Forums

Lifetime Care conducts several forums for service providers and industry participants. Quarterly Service Provider forums are conducted to keep providers up to date on new initiatives within the industry and upcoming changes to the

Scheme. Additional forums are also set up to provide training on specific tools that Lifetime Care has developed to assist service providers in building their capacity.

5.7 Provision of Personal Protective Equipment

Currently, within the Lifetime Care Scheme, service providers are required to provide all Personal Protective Equipment (PPE) for support workers. Other consumable equipment required for a service to be delivered (such as continence products) is covered within the costs of the scheme.

The Motor accidents (Lifetime care and support) Act 2006 states that:

“When requesting services:

Service providers need to give the Authority adequate documentation, outlining the reasons to support their requests, for treatment, rehabilitation and attendant care services. The Authority will use this information to make decisions on whether requests are reasonable and necessary. A number of factors are considered, including the following:

- *Benefit to the participant;*
- *Appropriateness of the service or request;*
- *Appropriateness of the provider;*
- *Relationship of the service or request to the injury sustained in the accident;*
and
- *Cost effectiveness considerations.”*

ACIA believes that PPE is a reasonable and necessary support and should be included under the items in the approval for care programs.

ACIA believes that gloves need to be readily available to minimise the risk to both participants and support workers. This is especially important in the time immediately after the participant has been discharged from hospital when infection risks and other clinical risks are imminent.

ACIA would like to note that there are other Schemes including the Victorian Traffic Accident Commission (TAC) that do cover the cost of PPE. The TAC considers that continence equipment is inclusive of PPE and that PPE is critical to the safety of continence procedures.

ACIA believes that adequate access to PPE is essential for the provision of quality service to participants. ACIA would like to recommend a review of the costs of providing PPE. The review should also consider the overall risk to participants and support workers if cases arise where PPE is not available.

5.8 Scheme Costs

ACIA believes that the costs of the Lifetime Care and Support Scheme remain reasonable, and can accommodate the growing number of participants within the scheme. The costs are reflective of the proactive nature of the scheme in providing early injury related supports and assistance in transitioning participants back to engagement with the community. It also reflects the proponents of the scheme are working to ensure that participants and providers are working together to minimise costs and work together to achieve common goals and budgets.

The Scheme also provides several payment incentives. This includes an incentive paid to support workers who are employed to travel to remote areas to delivery supports to participants. ACIA encourages such incentives as they assist providers in finding support workers to deliver services in locations that can otherwise be very difficult to service.

ACIA would also like to acknowledge that to date, Lifetime Care has responded to changes in the National Social, Community, Home Care and Disability Service Industry award. The Fair Work Commission review of the Social, Community, Home Care and Disability Services Industry Award review is due to be completed this year. ACIA and its members would be hopeful that Lifetime Care would respond to any changes in the award that may impact on a Service Providers ability to deliver services.

5.9 Maintaining a Stand Alone Quality Standard

With the introduction of the NDIS Quality and Safeguards Framework and the NDIS Practice Standard, some providers have started to question whether it will be feasible for them to maintain accreditation to multiple standards. ACIA is advocating for a streamlined human services standard that allows for recognition across disability services and aged care programs with the appropriate scope of services. However, given the full implementation of the NDIS Practice Standard is not anticipated to be before July 2019 ACIA would recommend that Lifetime Care continue to maintain a standalone Standard with specific scope specification for its approved provider panel to achieve certification to.

Maintaining a standard governed by Lifetime Care will eliminate the risk associated with future changes to the national standard. However, ACIA also acknowledges that this increases the regulatory effort for providers who receive funding under multiple programs. To minimise the effort for providers in maintaining multiple certifications, ACIA would recommend that additional training be offered to Certifying Auditing Bodies to make sure they are aware of the similarities between

Schemes. The intent of this training would be to minimise the cost and time of auditing providers who hold multiple certifications.

5.10 Recent Media Attention

ACIA believes it is important to acknowledge recent media attention focussed on certain providers, including Lifetime Care approved panel providers. The Four Corners episode aired on Monday the 27th of May titled 'Fighting the System' highlighted the need for the provision of ongoing quality safeguards. The issues raised by the Episode highlighted the vulnerability of the population of people that are supported by the Lifetime Care scheme, particularly those with an Acquired Brain Injury. Quality and Safeguards need to be maintained and continuously reviewed in order to maximise the safety of the participants of the Scheme.

Despite the best efforts of quality and safeguards programs providers will at times do the wrong thing. Service providers who pride themselves on their service delivery standards may at times be involved in incidents that bring their services into question. Whether this be due to the actions of an individual support worker or an event beyond the control of the service provider, when such incidents do occur, service providers need to follow due diligence in their processes for responding to and reporting the incident. A review of the incident reporting and communication structures between Lifetime Care and Support Authority and service providers should be considered. This will be particularly important as the industry continues to expand.

5.11 Implications of the NDIS

As the NDIS moves towards a national rollout and the number of participants within the NDIS continues to grow, further pressures will be placed on the industry. It is generally expected that there will be a large increase in demand as well as an increase in the number of providers within the industry.

An increase in demand will have a direct impact on the Lifetime Care and Support program. It is anticipated that it will become more difficult for service providers to recruit and retain support workers that have appropriate levels of training.

The number of providers in the market is also expected to grow and it is anticipated that existing providers will have the opportunity to expand quickly. As the industry expands, it will be important for Lifetime Care to maintain its focus on quality standards to ensure safeguards in delivery continue to be maintained. By committing to the re-tendering process and selecting a panel of providers, the

Lifetime Care and Support Scheme can minimise the risks associated with the emergence of “pop up shop” providers. The panel approach limits the Scheme’s exposure to providers who take on participants with high clinical needs without the appropriate structures in place to provide the level of clinical support required by Lifetime Care participants.

The existence of the Lifetime Care and Support Scheme has strengthened the availability of specialist skills and knowledge within the industry. Particularly in relation to the support of Spinal Injuries and Acquired Brain Injuries. The rollout of the NDIS may lead to this professional niche market being diluted.

6. Summary

ACIA is pleased to have had this opportunity to provide input to the First Review of the Lifetime Care and Support Scheme. We look forward to seeing the outputs of the review.