

**Submission  
No 3**

## **INQUIRY INTO 2020 REVIEW OF THE LIFETIME CARE AND SUPPORT SCHEME**

**Organisation:** Australian Community Industry Alliance (ACIA) Ltd

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leading quality in  
community services

# **Review of the Lifetime Care and Support Scheme**

## **ACIA's Submission**

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## **Introduction**

The Australian Community Industry Alliance (ACIA) formerly the Attendant Care Industry Association, welcomes the opportunity to provide this submission to Upper House Committee's Review of the Lifetime Care and Support Scheme.

## **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
- Representation on the NDIS Commission Industry Consultative Committee
- Representation on the NDIS Advisory Group on Market Oversight
- Representation on the NDIA Provider Network
- 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, advice, 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:

- National 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 Scheme, ACIA members are primarily concerned with:

- The requirements of them when participating 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.

### **ACIA's Involvement in the Lifetime Care and Support Scheme**

ACIA has a long history with the Lifetime Care and Support Scheme, ACIA's 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, including the development of the first Quality Standard for the Attendant Care Industry in Australia: The Attendant Care Industry Management System Standard 2008 (ACMIS 2008). ACMIS 2008 was a requirement for all approved providers who delivered attendant care to the scheme participants. Today the current Chief Executive Officer is a representative 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 administers the Australian Community Industry Standard 2018 (ACIS 2018), the revised quality services standard that is currently required for all Lifetime Care panel 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.

## **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.

ACIA collaborated with the Department of Social Services on the development of the Quality and Safeguards Framework and the NDIS Scheme and Practice Standard and also worked with the Department on roll out of the Scheme and the introduction of the Standard across Australia.

ACIA is a member of the National Aged Care Alliance and recently worked with the Department of Health on the Reablement Expert Reference Group and the Reablement Trials. ACIA was also a contributor to a position paper on Wellness and Reablement with the Australian Gerontology Association for all Australians Receiving Home, Community and Residential Aged Care Services.

ACIA believes that Aged Care and Disabilities services should be held to the same requirements in providing quality in service delivery.

## **ACIA's Submission to the Upper House Review**

### **Leading Quality in Service Delivery**

The Lifetime Care Scheme requires that all Service Providers who deliver Attendant Care services to program participants are required to be certified in the ACIS 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. ACIA believes that Lifetime Care's approach to the regulation of a quality standard at the level required by them, has introduced safeguards for participants more proactively than any other State or Federal Government Scheme and potentially reduced the number of serious events.

Lifetime Care supports Service Providers to achieve the ACIS 2018 standard through an incentive payment that can be put 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 outcomes for participants.

### **Person Centred Service Delivery**

The Lifetime Care Scheme focuses on the needs of the person receiving supports (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.

### **The Attendant Care Unit**

ACIA believes that the development of the 'Attendant Care Unit', or so named, within the Lifetime Care 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 valuable for providers when there are difficulties with the delivery of service for an individual participant and became critical with the challenges encountered through the recent COVID-19 pandemic. It would be considered by providers as one of the more collaborative agencies that works with service providers for the best outcome for their participants.

### **Lifetime Care Co-ordinators**

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 program 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.

### **Individualised Training to Support Participant Needs**

Within the Scheme, there is provision for supporting participants via the training of support workers on specific participant needs. 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 transmission of requirements from these specialists to support workers. This helps support the individual care needs of the participant and helps service providers and their support workers deliver the best outcomes to participants. Service Providers have also expressed their appreciation in being able to easily access specialist clinicians who are on hand. A recently introduced project involving the production of three training modules for support workers utilising an innovative technology platform coupled with content utilising ACIA's industry expertise in quality compliance and best practice, has produced a very positive response from Service Providers. It aims to deliver a consistent approach to training for attendant care workers that maps to the requirements of industry quality standards and current best practice.

ACIA would recommend that this initiative be expanded to support the industry in ensuring a consistent quality foundation to service delivery is maintained.

### **The Recent COVID -19 Pandemic**

The COVID-19 pandemic posed significant challenges for home and community service providers, particularly those providing services to participants with a disability requiring complex supports. In the initial stages of the pandemic there was significant confusion amongst providers and participants with varied information being communicated by different government departments. This impacted on vulnerable participants and their families in terms of how it would affect their services and understanding what safeguards would be put in place to protect their wellbeing. A number of Service Providers encountered issues with accessing participant's homes as they feared potentially becoming infected and many experienced difficulties in accessing supplies of Personal Protective Equipment (PPE) and hand sanitiser. Prior to the introduction of COVID-19 Lifetime Care

quarterly Service Provider forums to keep providers up to date on new initiatives within the industry and upcoming changes to the Scheme. Additional forums were also set up to provide training on specific tools that Lifetime Care has developed to assist service providers in building their capacity. During the pandemic, however, Lifetime Care staff conducted fortnightly service provider meetings where providers could highlight issues of concern regarding the delivery of service to participants including shortages of Personal Protective Equipment (PPE) for support workers, recruitment and retention of an already stretched workforce, and the need for additional and increased care support coordination for families. They also addressed the concerns of participants and their families. The communication and assistance by the Attendant Care Unit during the initial stages of the pandemic served to minimise or alleviate potential incidents for both service providers and participants.

### **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.

ACIA believes that PPE is a reasonable and necessary support and should be included under the items in the approval for care programs. This is even more critical now with the increase in virulent communicable diseases such as COVID-19

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. In addition, participant services that pose an exposure risk to support workers to participants body fluids should also be provided with access to protective eyewear and disposable apron/gown and be considered a necessary cost to delivering services safely.

ACIA believes that adequate access to PPE is essential for the provision of quality service to participants. ACIA would like to recommend a further 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.

### **Scheme Costs**

ACIA believes that the costs of the Lifetime Care 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 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 choose 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 Disability Service Industry award. However, the Fair Work Commission's review of the Social, Community, Home Care and Disability Services late in 2019 has led to a significant pay differential, particularly on weekends, which has a significant effect on providers supporting participants with high complexity needs. 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 remain profitable.

### **Maintaining a Stand-Alone Quality Standard**

With the introduction of the NDIS Quality and Safeguards Framework and the NDIS Practice Standard, some providers have questioned 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 nature of the Lifetime Care Scheme and the very specific needs of Lifetime Care participants and the high risk associated with the delivery of their care, ACIA would recommend that Lifetime Care continue to maintain a standalone Standard.

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 works closely with providers to address their issues and would also recommend that the training currently offered to Certifying Auditing Bodies be expanded to ensure they are aware of the

similarities between schemes continues. The intent of this training is to minimise the cost and time of auditing providers who hold multiple certifications.

### **Recent Media Attention**

ACIA believes it is important to acknowledge recent media attention focussed on certain providers, with a specific reference to the death of a disability client in South Australia and also evidence provided at the recent Royal Commission into Violence, Abuse, Neglect and Exploitation of People with a Disability. The issues raised by both matters highlighted the vulnerability of the population of people with a disability and the need for the provision of ongoing quality safeguards including those supported by the Lifetime Care scheme, particularly those with an Acquired Brain and Spinal 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. The Lifetime Care Support Authority has made significant improvements in reporting requirements by Service Providers, but further improvements could be made with the sharing of information regarding critical incidents and serious events between government departments and the Lifetime Care and Support Authority.

### **Implications of the NDIS**

As the NDIS moves towards finalising 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 new providers entering the industry.

An increase in demand will have a direct impact on the Lifetime Care 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.

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 Scheme can minimise the risks associated with 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 Scheme has continued to strengthen 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.

## **Summary**

ACIA is pleased to have had this opportunity to provide input to the Review of the Lifetime Care and Support Scheme. We look forward to reviewing the outcomes of the review when made available.