10 October 2019

BY EMAIL ACRCsolicitor@royalcommission.gov.au

The Solicitor Assisting the Royal Commission
Royal Commission into Aged Care Quality and Safety
Level 34, 600 Bourke Street
Melbourne VIC 3000

Dear The Solicitor Assisting the Royal Commission

14 October 2019 Melbourne Hearing of the Royal Commission into Aged Care Quality and Safety – UoW report

We refer to the NTG-0362 and your letter dated 3 October 2019.

ACSA was pleased to be asked to review the commissioned research report “How Australian residential aged care staffing levels compare with international and national benchmarks” prepared by the Centre for Health Service Development.

In principle ACSA supports its direction and findings to consider the development of an Australian staffing model for residential care based on the CMS system (USA) supplemented by the British Columbian system (specifically its treatment of allied health).

This proposed approach will support the delivery of providing quality care to all older Australians and will give people transparent information on which to make critical life decisions.

Having the right numbers, types and mix of staff on any shift in a residential care facility on any day or time of the week is absolutely paramount to providing quality care. ACSA has publicly stated that more staff are needed in aged care. We know this through our member’s service delivery challenges and because it is what residents, families and staff tell us.

The proposed approach, while requiring further development and trialling, is particularly appealing as a star rating system is easily understood and supports meaningful comparisons by individuals, families and the Australian community. It is also flexible enough to support different models of care, including the emerging household model, by acknowledging that residents have different needs, which require different levels of support and skill combinations to provide the right support.
The inclusion of allied health – in its broadest application and not just focused on one or two disciplines (such as physiotherapy, which while incredibly important is only one therapeutic intervention) is absolutely critical to ensure that our residents can be well supported. In taking this work forward we would need to ensure that the many varied roles that directly interface with residents are taken into account including, for example, activity coordinators. ACSA has long advocated and supported the need for a reablement approach and the inclusion of allied health, in this will help to give life to this aspiration.

The report’s findings, that 57% of services would receive a 1 or 2 star rating, is not a surprise to ACSA given we have identified the need to see increased staffing in aged care. The report’s findings highlight that to achieve a 3 star rating or above will require a significant increase in nursing, care and allied health staff time, per resident, per day.

While supporting in principle the adoption of a universally understood and utilised star rating ACSA wants to be clear that this should not be used to create a two-tiered system. Every Australian has the right to access quality care regardless of their financial means or geographic location.

The development of this model, specifically for Australia provides an opportunity to inform future staffing requirements and support transparency.

This report quotes international evidence that supports such a system:

“The expansion of home care services internationally has resulted in people entering residential aged care with greater complexity of care needs and at the same time, ‘demanding greater flexibility, more choice, more autonomy and a higher quality of services.’ Together with the shift towards person-centred care, these changes require a staffing profile that can support resident’s autonomy, daily functioning or well-being while at the same time addressing clinical needs associated with complex health care needs and comorbidities.”

The report acknowledges the need for increased care funding of which most would be focused on “…increasing staffing levels to an acceptable standard”. However, it also notes this should not occur “…in isolation from broader aged care funding reform.”

ACSA will work with government and stakeholders in the further development and eventual adoption and implementation of this kind of sophisticated model. Development and implementation needs to be considered and planned.

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ACSA also notes that this will only work if it is properly funded and introduced over a realistic timeframe which allows for recruitment and training of the 20% extra staff numbers needed nationally.

The University of Wollongong study highlights that the additional resources required to achieve the increased time with residents per day will not do anything to address current viability issues or wages at a level that will improve attraction, recruitment and retention.

Yours faithfully

Pat Sparrow
Chief Executive Officer

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