

Chapter 1

- Page 14. High-quality aged care delivering service in a timely, predictable, and responsive way. Reasonable timeframes? Time and place of their choosing?
 - This derived from the issue I have heard people mention around providers giving large time slots for which they have to be at home for services.
 - For example Cleaning will be occurring between 12 and 4pm. Instead of providing a specific time.
- Page 20. Do 'advocates, significant persons and social connections' need to be registered as either supporters or representatives? Should supporters and representatives be referenced to in this section?
- Where are principles of supported decision making documented/ outlined? Or they implied in the duties for each?
- Supporters and Representatives need to be easily visible in the MAC portal and same terminologies used.
- Separate Section for 'People you Support' vs. 'People you Represent'. So, there is no ambiguity. Currently provided on the MAC portal under 'Support Networks' there is 'Your Support Network', 'People you Support' and 'Declined and ended relationships'.
- Similar approval process for other government department i.e Services Australia vs. AgedCare representative. From my experience Services Australia was just a verbal approval.
- Letter/ Notification when changes are made to supporters and/or representatives? Making it clear the expectations of how to perform that role, including what information they will receive. Education should also be provided for the supporter and representative roles.
- Will supporters and representatives both get an Aged Care ID and have full access to the MAC portal?
- How will changing over from say all Supporters to Representatives work?
 - Will this be an opt-in or opt-out process?
- It is stated that people that have for PoA will automatically require that individual to be registered as a representative and in-turn any future people supporting that individual. Meaning there is no possibility of having a supporter if PoA is already

Chapter 2

- When will easy-to-understand support plan be issued for review?
- Will people already receiving services be issued a new plan once the New Act is in effect?
- Will all those already receiving services need to be re-assessed? (one of the Q&A's indicated that this was the case)
- People outside the specified eligibility criteria should be evaluated on a case-by-case basis. Short-term vs. Long-term (chronic). NDIS vs. MyAgedCare.
- As the systems don't talk to each other, entering one service system then having to transition will cause unnecessary burden.
- Categories? Classification? Service Types and Services? Service Groups – I can see the transition being very confusing for all parties. Lots of terminologies.

- Will the approved, assigned, receiving services process remain the same in the New Act?
- Conditions vs. Reassessment? The option of including conditionals is unclear and understanding what these actually look like within a support plan is missing.
- If people don't know how to trigger an increase in service classification via conditionals, they will default to getting re-assessed, putting more strain on the assessment teams.
- Who is responsible for increasing services based on a conditional/ what does this look like? (Instigated by the individual, family/ carers, service provider?)
- Page 30. Individuals' preference and goals to be communicated to service providers to inform and be incorporated into a person support plan. (Only tell their story once!)
- Page 31. "Time period prescribed by the rules" Yet to be released for comment.

Chapter 3

- Still unclear what type of platforms fit within this definition?
 - [redacted] vs. [redacted]
 - [redacted] for finding support workers and receiving services, while [redacted] is more targeted towards the providers and the management of people receiving services. They might not have access to these platforms.
 - Both should be regulated by the New Act.
- I have recently been able to view invoices through a provider created portal. Will this be covered by the act? The portal has no reference to Terms and Condition or a Privacy policy. See screenshot below.

Welcome to [redacted]

Please Login

Username *

Password *

[Forgot Password](#)

LOG IN CLEAR CLOSE



- It would be good to catalogue and list Approved Software's/ Digital Platforms on the MyAgedCare website?
- How will a user know the platform meets the new regulation?

Confusion wording around what is and isn't a digital platform. Act seems to contradict itself. Items (2) and (3). Some platforms will be included but others won't but this will be specified in the rules not in the Act?

Part 6 – Aged care digital platform operators

The new Aged Care Act introduces the concept of aged care digital platform and provides a separate statutory duty and certain obligations on operators. An aged care digital platform will be defined to cover online applications or websites operated to facilitate the delivery of services in the aged care system:

128 Meaning of aged care digital platform

- (1) An aged care digital platform means an online enabled application, website or system operated to facilitate the delivery of services in the aged care system (whether funded aged care services or not), where:
 - (a) the operator of the application, website or system acts as an intermediary for individuals seeking to access those services who interact with entities providing the services via the application, website or system; and
 - (b) the operator of the application, website or system requires, and processes, payments referable to that intermediary function.
- (2) An aged care digital platform also means an online enabled application, website or system that is prescribed by the rules.
- (3) An aged care digital platform does not include an online application, website or system prescribed by the rules.

Chapter 4

- Supplementary Funding? Where is this documented/ recorded MAC portal?

Chapter 6

- Unannounced investigations. What expectations will be put on the provider to accommodate such investigations?
- Any such investigation should be conducted without impacting delivery of care, uphold the privacy and rights of the individuals.
- For the Critical powers drafted it is unclear if this is for both Aged Care facilities and all register providers including home care?

Chapter 7

- Confidentiality of information requires more specificity.
- Personal information:
 - Could some examples of what this includes be added such as medical information, assessment classification, approved services etc.
 - Or perhaps any information generated through Chapter 2?
- Data Sharing between Digital Health systems?
- Interoperability and transfer of data is large focus of the recent Digital Health Blueprint and Aged Care Data and Digital Strategy. This section lacks any governance or detail around this.
- The notion of 'tell your story once' and it following you on your healthcare journey should feature here!

Chapter 8

- Use of computer programs for decisions on the classification of individuals and decisions on the priority of individuals is complete absence from 2023 draft 'Aged Care Data and Digital Strategy'.
- A lot 'to be drafted'. Is the use of computer programs referenced in relevant parts of the act i.e. Chapter 2?
- Will an individual know that a computer program has been used during the process? Such as indicated on the issued plan/ letter and explicitly stated.
- As AI intentionally been omitted from this section? Large difference between computer systems and using an AI algorithm to make decisions. Governance around data bias, training, testing and then implanting such a process.

Additional Questions:

Is self-managed implied as an option in the New Act?

Currently you can do a direct comparison between fully-managed and self-managed in terms of admin/ care management costs (30% vs. 15%). Will this still be possible in the New Act since the Care Management will be funded separately?

When individuals are able to receive services from multiple providers. Who is responsible for managing the budget?

How are potential budgetary issues identified within the system? Especially if reporting periods are quarterly as opposed to monthly.

How will people accessing services under self-manage through a digital platform know what service they are approved for? Will access be limited based on their classification?

Concerned that the system Governor role will be a bottle-neck as they are gate-way to a lot of the New Act and are in control of a lot of the processes and procedures.