

#### Positives of the Proposal:

##### Increased Focus on Quality and Safety:

The new rules aim to ensure better quality of care, which could benefit clients by promoting higher standards in service delivery and creating a more consistent, secure environment.

Providers are given clear guidelines on quality standards and safety, which helps in ensuring compliance and reducing risks.

##### Place Allocation:

The proposal provides clarity on the allocation of places for aged care services. Clearer expectations and processes for how clients are prioritized could improve service delivery and help meet demand effectively.

Increased transparency in place allocation can enhance trust between providers, clients, and other stakeholders.

##### Stronger Accountability:

The rules will likely ensure that providers maintain high standards by imposing reporting and documentation obligations, which can help reduce risks of subpar care.

Clearer obligations for providers could help local councils and providers understand their roles, responsibilities, and avoid confusion.

##### Flexibility and Exemptions:

The rules allow for exemptions in certain cases, especially around the requirement for registered nurses on-site 24/7 in residential care homes. This flexibility can be useful for rural or remote areas where staffing may be more challenging.

##### Support for Transition to a More Comprehensive Aged Care System:

The shift towards a more person-centered and comprehensive aged care system aligns with ongoing reforms. This may result in greater integration between services, leading to a more streamlined experience for clients.

#### Negatives of the Proposal:

##### Increased Compliance and Administrative Burden:

The new obligations, such as reporting and compliance with quality and safety standards, could significantly increase the administrative workload for local government and Council CHSP providers. This may require additional staff or resources, leading to financial strain.

The complexity of the rules might also require additional training for staff, creating further cost burdens.

##### Financial Strain:

The proposal's emphasis on quality assurance and safety may require additional resources to ensure compliance, which could be financially challenging for some local government providers with already

tight budgets.

Potential increased costs for staffing, documentation, and quality assurance processes could strain already stretched local government budgets.

#### Impact on Rural and Remote Areas:

While the exemption for 24/7 registered nurses may provide flexibility, there may still be challenges in rural or remote areas where access to skilled workforce is limited. Some local councils may struggle to meet staffing requirements, even with exemptions.

#### Uncertainty around Funding and Support for New Requirements:

It's unclear whether the new rules come with additional funding or support for local government providers to meet the increased demands. If funding is not adjusted accordingly, local councils might struggle to provide services at the required standards.

#### Risk of Disruption to Existing Services:

Local governments have established service systems and relationships with clients. The introduction of new rules may cause disruption in services, particularly in the short term, as providers adjust to the new requirements.

If the implementation timeline is too tight, there may be a risk of rushed or inadequate implementation, leading to operational issues.

We, as a provider of the Commonwealth Home Support Programme (CHSP) under the Aged Care Act, appreciate the opportunity to provide feedback on the Aged Care Rules "Release 4a, which focuses on place allocation, obligations, and funding for aged care providers.

#### Positive Aspects:

We recognise and support the overall intent of these proposed changes, particularly in relation to improving the quality and safety of aged care services. Local government providers, including our council, share a strong commitment to delivering high-quality, person-centred care to our community's aged population. The emphasis on transparent place allocation, enhanced quality assurance, and stronger accountability aligns with our own values and objectives.

The flexibility for exemptions in certain staffing requirements for rural and remote areas is appreciated, particularly given the challenges we face in ensuring an appropriately skilled workforce in these regions. We would like however for this opportunity to be extended to interface councils.

#### Concerns and Potential Issues:

While we acknowledge the positive objectives of the proposal, there are several areas of concern from a local government and Council CHSP provider perspective:

#### Increased Administrative Burden and Compliance Costs:

The introduction of stricter reporting, documentation, and quality assurance standards will likely result in a significant increase in administrative tasks for our teams. The additional resources required for

compliance, including training, software, and dedicated staff, could result in a substantial financial burden on local government providers.

The potential for duplication of reporting requirements between state and federal bodies may lead to inefficiencies and confusion.

#### Financial Strain and Lack of Clear Funding Support:

Local governments, especially those delivering CHSP, often operate under tight financial constraints. The new requirements outlined in the proposal could necessitate additional funding to ensure that quality and safety standards are met. We request clarification on whether the proposed changes will come with additional funding to support local governments in meeting these obligations.

Without adequate funding or support, there is a risk that smaller councils or those in economically disadvantaged areas may struggle to deliver the required services.

#### Challenges in Rural and Remote Areas:

While exemptions for registered nurses are a positive step, the ability to attract and retain skilled staff in rural and remote regions remains a significant challenge. We encourage further exploration of additional support measures to ensure that councils in these areas can continue to meet service delivery standards.

#### Disruption to Existing Service Models:

As local government providers, we have long-established relationships with the community and systems in place for delivering services. The abrupt implementation of new rules could cause short-term disruptions to service delivery. A more gradual and phased approach to the implementation of these rules, with adequate support for transition, would be beneficial.

#### Recommendations:

We strongly recommend that the Government provide clear and adequate funding for local government providers to support the increased administrative burden and compliance requirements.

A comprehensive training programme should be implemented to ensure all local government staff are equipped with the necessary skills to comply with the new requirements.

Specific measures should be considered for rural and remote areas to address workforce shortages, such as targeted recruitment and retention programmes for aged care staff.

#### Additional Consideration for Interface Councils:

We would also like to highlight the unique challenges faced by interface councils, which often share many of the same difficulties as rural areas, such as limited access to a skilled workforce and geographical isolation. These councils, located at the boundaries between metropolitan and rural areas, may encounter difficulties in attracting and retaining staff, particularly for specialised roles. We recommend that interface councils be granted the same flexibility as rural areas to address these challenges, including targeted support for workforce development and the ability to tailor staffing solutions based on local needs.

We encourage a phased implementation of these changes to allow for smoother transitions and to minimise disruption to service delivery.

We look forward to further engagement on these matters and hope that the concerns raised in this submission will be given due consideration in the finalisation of the Aged Care Rules.