

Palliative Care Australia appreciates the opportunity to provide brief advice, limited to the provisions related to Registered Nurses. PCA is strongly supportive of the inclusions as drafted. Access to Registered Nursing care at all times that residential care homes are open (that is, 24/7 access to RNs as standard) is essential to the quality care of people living in residential aged care and is particularly important to the early identification of palliative care and end-of-life care needs, timely commencement of care and appropriate care including in response to deteriorating symptoms. The exemptions to 24/7 RN requirements, as drafted, are broadly an appropriate response to the reality of workforce shortages in particular in regional, rural and remote Australia. It is essential that evidence of alternative clinical care arrangements ensure access to quality care as defined in the strengthened Aged Care Quality Standards, in particular Clinical Standard 5 including 5.7 Palliative Care and End-of-Life Care. In general, the balance struck is appropriate. PCA supports proactive enforcement / operationalisations of the Rules related to RN care, for example PCA is supportive of the recent changes that link star ratings to meeting both 24/7 RN and care minute requirements.