



Vision Australia Submission

Aged Care Rules Consultation Stage 1 – Service List

Submitted to: Department of Health and Aged Care

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Submission approved by: Chris Edwards, Director Government Relations, Advocacy, NDIS and Aged Care

Aged Care Rules Consultation: Stage 1 – Service List

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Introduction

Vision Australia appreciates the opportunity to provide this submission to the Department of Health and Aged Care, as part of its consultation on the draft Support at Home Service List. Vision Australia is the largest national provider of specialised vision services within the aged care sector and delivers a high volume of vision supports under the Commonwealth Home Support Program each year. We manage Home Care Packages for a number of consumers who are blind or have low vision that will be transitioning to Support at Home following its introduction in July 2025. We also have subcontracting arrangements with over 350 Home Care Package providers nationally, under which we currently deliver vision supports to nearly 4,000 consumers. Approximately 70% of our clients are aged over 65 and access disability supports through the aged care system.

The prevalence of non-correctable vision loss increases with age, however, Vision Australia has significant concerns that the specialised services that enable independence and reablement for this cohort have not been considered at all in the proposed Support at Home Service List. Consumers are currently permitted to access these supports both through CHSP and the current HCP program, however, these provisions have not been replicated in the service inclusions for Support at Home. While we acknowledge the Department's efforts to ensure that grant funded arrangements for specialised vision services continue in operation, there is a significant risk that consumers with vision impairment transitioning to or commencing services through Support at Home from July 2025 will be unable to access evidence-based supports that build their capacity, prevent functional decline and enable them to remain living at home independently.

Recommendations

- The Support at Home Service List must be updated to permit the inclusion of services delivered by professionals that are unique to the vision sector. Unless this is remedied, clients transitioning to Support at Home from 2025 will have no means of accessing vision supports such as orientation and mobility and assistive technology training.
- The NDIS has an "Other Professional" category within its therapeutic supports framework to cater for services delivered by highly skilled vision professionals that are not AHPRA regulated. This should be replicated in the Support at Home Service List to enable ongoing provision of these supports.
- Consumers must be able to access assistive technology training as a separate service, and not merely as a wrap-around support under the proposed Assistive Technology and Home Modifications program. Many consumers currently utilise these supports to improve skills in accessing technology they already own, or to regain function and independence as their vision deteriorates. As such, assistive

technology training is not solely linked to setup and support when purchasing a new device.

- Vision services must be classified within the Service List as clinical supports. Consumers must not be compelled to pay a contribution fee in order to access essential early intervention supports that play a pivotal role in preventing functional decline.

Access to Specialised Vision supports

At present, there are two avenues through which aged care consumers access supports specific to their vision impairment. Participants in the Commonwealth Home Support Program receive a referral for Specialised Support Services Vision. This enables providers such as Vision Australia to deliver a variety of complementary interventions under one service type, including orthoptics, assistive technology training and orientation and mobility services. Consumers with a Home Care Package are similarly able to purchase these supports using their funding. This is permissible under the Quality of Care Principles 2014, which specifically include “other clinical services, such as hearing and vision services”. Vision Australia is particularly concerned to see that these service inclusions have not been replicated in the Home Support Service Types section of the Support at Home Service List. While therapeutic supports such as occupational therapy and physio are captured in the Support at Home Service List, many of the vision sector professionals, such as orthoptists, orientation and mobility and assistive technology specialists that typically operate within the allied health framework have not been included. While most of these professions are not AHPRA regulated, the supports they deliver are critical to the delivery of high-quality vision services, and to the achievement of good outcomes for consumers. Other funding schemes such as the NDIS recognise the specialised expertise of this workforce and have a “other professional” category within their allied health services framework to allow for delivery of these services. We would like to see a similar approach mirrored in the structure of professions within the Support at Home Service List, to ensure that older Australians with vision impairment do not miss out on vital support.

We acknowledge the Department has signalled its intention to continue grant funding arrangements for vision services for another year if necessary. It is important to note, however, that even if current CHSP funding arrangements for specialised vision services continue, many consumers will have needs beyond the scope of this program that will necessitate that they access services through Support at Home. Unless the draft Service List is amended, those consumers will have no means of accessing vision supports using their individualised funding package once the new Act and its associated subordinate legislation commences.

It is also important to ensure that vision services are properly recognised and defined as clinical supports within the Service List. The compounding factors associated with disability and aging mean that it is crucial that consumers have access to vision supports as an early intervention measure as soon as possible after diagnosis, or to respond to a deterioration in their condition. If these supports attract a client contribution fee, there is a significant risk that consumers will be discouraged from engaging with services that, if delivered expeditiously, will make an appreciable difference in preventing loss of independence and functional decline.

Assistive Technology Supports

Vision Australia notes that assistive technology prescription and clinical support has been included on the Service List, however, the provided definition of this support is significantly restricted and does not reflect its current usage in practice. The Service List currently includes clinical support related to assessment of needs, identification of appropriate products and wrap-around clinical services relating to those products. This partially captures the manner in which these supports are typically used by consumers, however, it implies that training and support services will always be linked to assessment and purchase of new equipment. Many older Australians with vision impairment will also work with an assistive technology specialist to provide support and training around mainstream products that they already own. Those with sudden onset vision loss will generally have to learn new and vastly different ways of accessing existing technologies. For example, many computers, smart phones and tablet devices have built-in accessibility features such as screen reading or magnification software, however, the learning curve to master usage of these features is extensive and will usually require specialised training. We propose that the definition of assistive technology supports should be amended to clarify that training and support can be accessed as a distinct clinical service without being linked to product assessment and purchase.

Conclusion

Vision Australia thanks the Department of Health and Aged Care for its consideration of this submission. We would be happy to provide more information regarding any of the issues raised. We also wish to emphasise the importance of ongoing consultation with providers of vision services in the aged care sector as the details of the Support at Home program are refined. We work with a low incidence cohort with unique service requirements that are addressed by a small professional workforce with highly specialised skills. The aged care consumers we support are at risk of significant disadvantage if their needs are not accurately reflected in the reforms to Australia's aged care system.

About Vision Australia

Vision Australia is the largest national provider of services to people who are blind, deafblind, or have low vision. We are formed through the merger of several of Australia's most respected and experienced blindness and low vision agencies, celebrating our 150th year of operation in 2017.

Our vision is that people who are blind, deafblind, or have low vision will increasingly be able to choose to participate fully in every facet of community life. To help realise this goal, we provide high-quality services to the community of people who are blind, have low vision, are deafblind or have a print disability, and their families.

Vision Australia service delivery areas include:

- Allied Health and Therapy services, and registered provider of specialist supports for the NDIS and My Aged Care
- Aids and Equipment, and Assistive/Adaptive Technology training and support
- Seeing Eye Dogs

- National Library Services
- Early childhood and education services, and Felix Library for 0-7 year olds
- Employment services, including National Disability Employment Services
- Accessible information, and Alternate Format Production
- Vision Australia Radio network, and national partnership with Radio for the Print Handicapped
- Spectacles Program for the NSW Government
- Advocacy and Engagement, working collaboratively with Government, business and the community to eliminate the barriers our clients face in making life choices and fully exercising rights as Australian citizens.

Vision Australia has gained unrivalled knowledge and experience through constant interaction with clients and their families. We provide services to more than 26,000 people each year, and also through the direct involvement of people who are blind or have low vision at all levels of the Organisation. Vision Australia is therefore well placed to provide advice to governments, business and the community on the challenges faced by people who are blind or have low vision fully participating in community life.

We have a vibrant Client Reference Group, with people who are blind or have low vision representing the voice and needs of clients of the Organisation to the Board and Management. Vision Australia is also a significant employer of people who are blind or have low vision, with 15% of total staff having vision impairment.

We also operate Memorandums of Understanding with Australian Hearing, and the Aboriginal & Torres Strait Islander Community Health Service.