

New Aged Care Act Rules Consultation Release 1 -Service List

Multicultural Aged Care (MAC)

- Centre of Excellence in Cultural Diversity and Inclusion.

Multicultural Aged Care (MAC) is a peak body for Culturally and Linguistically Diverse (CALD) ageing, aged, and community care. We provide leadership by bringing and keeping the needs of CALD older people on the national agenda.

MAC receives funding from the Australian Government for the Commonwealth Home Support Program (CHSP) SSD Sector Support and Development and SSG Social Support Group services and Partners in Culturally Appropriate Care (PICAC).

Our expertise lies in cultural knowledge, delivering Cultural training to the aged care workforce; in home and community care, residential facilities as well as mainstream aged care service providers.

MAC CHSP SSG Social Support Group program has 200 older persons of CALD backgrounds over 4 metropolitan locations Adelaide North South West East that we provide aged care services. Including Maltese, Hungarian Chinese Vietnamese Serbian, Filipino, Arabic speakers, Italian, and Greek communities.

MAC SSD work to supports CALD CHSP and HCP service providers in SA including 30 CALD Service providers

CALD CHSP and HCP service providers, including Greek, Croatian, Ukrainian, Latvian, chines, Vietnamese, Italian, polish German Hungarian Maltese Macedonian Muslim and Jewish services and communities

Multicultural Aged Care (MAC) is the Lead Agency in CALD Aged and Community Care and developand deliver trainings, education and information which aligns with the aged care reforms and leads sector development initiatives.

MAC training is underpinned and informed by Cultural Intelligence (CQ) principles.

Supporting Aged Care providers, peak bodies and consumers to embed the Aged Care Diversity Framework and develop CALD Action Plans.

MULTICULTURAL AGED CARE

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CONSULTATION 2024

MAC undertook a consultation with our CALD service providers CHSP and HCP providers and other mainstream service providers agencies providing services to CALD older persons within the aged care services.

This Submission has been consulted, discussed and presented to a wide range of Service Providers predominantly, CALD Service Providers

The comments and recommendations submitted here in South Australian to gather culturally and linguistically diverse communities and service providers perspectives.

It reflects their opinions, comments, concerns and recommendations as a collective group in SA aged care service delivery to older persons of Culturally and Linguistically Diverse CALD backgrounds.

The consultations were held over a few weeks, including webinars presented by MAC as part of our aged care reforms information and education and individual contact with CALD agencies and small group forums.

Multicultural Aged Care Inc.

General comments and concerns from participants regarding the service list.

Primarily CALD CHSP and HCP services providing services in homes and community and social and community settings.

Particular service types discussed were the following, Social Support Group programs, Social Support Individual, Domestic Assistance, Transport services, Meals, Home maintenance and repairs.

Overall comments and concerns

The service list does not provide any cost details at the current moment, which is difficult, moving forward. Because most of these services are provided by smaller CALD service providers with limited staff and also relying on volunteers. The Service categories, listed as either—Independence Services or Everyday Living Services is where most of Services fit into these categories. The concerns are that older people who need these services to stay independent within their own homes, will need to make an increasing co-contribution towards pay for these Services. Particularly the services that are nominated as everyday living which would normally be paid by the person's themselves.

A particular concern regarding co-contribution by the older person for the service types listed of, Social Support Group programs, Social Support Individual, Domestic Assistance, Transport services, Meals, Home maintenance and repairs. Many of these services are provided. To support an older person to stay at home. And, if they are considered as part of the everyday living costs then, the older person's co-contribution if it has to increase would impede, their ability to pay for the services and therefore, may result in the older person, no longer paying because they can't afford it. And not having the services to help them at home. Thereby limiting their independence and their ability to continue to live in their own home with help.

Everyday living and Independence service categories may become very costly and the capped nature of some of these e.g. domestic assistance services will not be able to meet the support requirements of the older persons for these services within a year.

We believe that the concern is that older people will choose not to accept or agree to these Services because of the costs involved. And therefore, their circumstances might deteriorate as in respect of them maintaining, their own

independence and their everyday Living Services to support themselves in their own home.

Details of the service type and capped services and subsidies as listed below directly from the service list document

Prices per service types

Providers expressed that unit pricing is critical in determining the viability and quality of the Support at Home Program for all involved providers and older persons

CHSP providers and Home Care Package providers will need to carefully consider their future in the Support at Home Program, to consider their current services and costs involved now and into the future and considering the new Support at Home program. Their viability and how they can maintain their services, and evaluate what services will be financially viable and sustainable in 2027.

Pricing advice for each service type/ service sub-type based on cost per unit of services such as per hour or per meal which will be calculated using providers' total costs and volume of services delivered.

Clients may face challenges in managing their allocated funds, leading to situations where they do not have enough funds available to cover the services provided.

There is a potential that there will be delays in payments from clients or their representatives, which can impact the cash flow and financial stability of service providers.

Managing invoicing and payments may become more complex and timeconsuming, requiring additional administrative resources to ensure timely and accurate billing and likelihood of increasing administration costs

If clients are unable to pay for services, there is a risk of service disruption, which can affect the continuity and quality of care provided. This will be a challenge when working towards high quality care and adhering to the aged care legislation.

Providers raised concerns about how CHSP funding has not kept up with inflation for years and that some study on this area as part of 2025-26 pricing is done soon and to be completed CHSP transition in 2027.

The Commonwealth Home Support Programme, has block funding, and has been successfully providing support for older Australians to stay independent in their homes for longer.

It has and is a safety net for those requiring immediate support whilst on a Home Care Package Program waiting list.

Some ongoing concerns for CHSP providers include

- CHSP services will lose what is working well
- clients/consumers to be independent, with a subsequent outcome of minimal empowerment for clients/consumers
- providers may be forced to consider alternative approaches, e.g. removing their wellness approach to service delivery models to reduce costs and stay viable in meeting outputs
- may not be an improvement on the existing CHSP programs and

Certain service types to be considered for additional pricing adjustments to recognise social support aspects of the service e.g. significant social support aspects are imbedded in the Domestic Assistance, Meals, Transport, and Social Support and Community Engagement service types and required to be recognised as part of pricing adjustments.

E.G. cleaning is not just about performing a task of general house cleaning but also contributor of wellness and reablement. Social wellness involves maintaining relationships with friends, family, and the community, and having an interest in and concern for the needs of others

CHSP services utilise significant number of volunteers in the CHSP service delivery support services aimed at delivering low-cost services for clients. CHSP sector has already lost a significant number of volunteers and as a result provider faced with increased additional costs in staff and volunteer recruitment, on boarding, training, and education. Therefore, the Support at Home unit pricing should consider diverse operating aspects in the CHSP sector and should not leave these essential components of service delivery to address through competitive grants.

Some service types (meals, transport, and social support etc) in the Support at Home Program will attract greater fixed costs. If fixed costs are funded inadequately and or unfunded for a substantial time provider will struggle to operate services which could directly impact on safety and high- quality care aspects in the Support at Home Program. Furthermore, Services with high fixed cost will not be viable and services will need to be reduced or ceased.

One of the bigger challenges faced by aged care sector is the workforce. Providers understand that employee turnover is expensive. Providers have commented that pricing advice must be responsive to build a capable workforce which offers continuous training and education to success in the new Support at Home Program service deliverables.

Division 2—Home support service types

36 Domestic assistance

- (1) A service listed and described in an item of the following table:
 - (a) is in the service type domestic assistance; and
 - (b) has the subsidy basis efficient price; and
 - (c) has the base efficient price specified in the item.

Services that are capped

(2) The cap on the service listed and described in item 1 of the following table for a calendar year is 52 hours.

1	General house cleaning	The provision of, or assistance with, light household cleaning, including mopping, vacuuming, washing dishes, and general tidying of surface areas, that ensure the individual remains safe at home, but not including professional cleaning such as carpet cleaning, pest control, dry cleaning or pet care	[TBA]
2	Laundry services	The provision of, or assistance with, laundry activities, including but not limited to the laundering of clothing and bedding and the ironing of clothing	[TBA]
3	Shopping assistance	The provision of shopping, or assistance with shopping activities, including developing a shopping list, driving to a shop, and assisting with the collection of shopping, but not including the cost of the shopping	[TBA]

38 Home maintenance and repairs

(1) A service listed and described in an item of the following table is in the service type home maintenance and repairs.

Services for which subsidy basis is efficient price

- (2) A service listed and described in item 1 or 2 of the following table:
 - (a) has the subsidy basis efficient price; and
 - (b) has the base efficient price specified in the item.

Services for which subsidy basis is cost

(3) The service listed and described in item 3 of the following table has the subsidy basis cost.

Services that are capped

(4) The cap on the service listed and described in item 1 of the following table for a calendar year is 18 hours.

Item	Column 1 Service	Column 2	Column 3 Base efficient price (\$ per hour)	
		Description		
1	Gardening	The provision of, or assistance with, maintenance of a residential garden, including essential light gardening such as mowing lawns, pruning shrubs and clearing yards that contributes to maintaining the individual's home in a safe and habitable condition, but not including the following:	[TBA]	
		(a) professional gardening services that would usually be paid for by the individual (such as tree removal, landscaping or farm or water-feature maintenance);		
		(b) gardening services that relate to visual appeal rather than safety or accessibility (such as installing and maintaining plants, garden beds and compost);		
		(c) services that are the responsibility of other parties (such as landlords or government housing authorities) and that are generally covered by private insurance		
2	Assistance	Essential minor repairs and maintenance:	[TBA]	
	with home maintenance and repairs	(a) that the individual used to be able to do themselves (such as cleaning gutters, replacing lightbulbs and repairing broken door handles); or		
		(b) that are required to maintain safety; or		
		(c) that are required to address an imminent age-related safety risk (such as repairing uneven flooring that poses a falls risk or a section of carpet damaged by a wheelchair);		
		but not including the following:		
		 (d) professional maintenance and repair services that would usually be paid for by the individual (such as professional pest extermination, installing cabinetry or replacing carpets due to usual wear and tear); 		

Item	Column 1 Service	Column 2 Description	Column 3 Base efficient price (\$ per hour)
3	Expenses for home maintenance and repairs	Expenses related to the service assistance with home maintenance and repair	Not applicable

40 Meals

A service listed and described in an item of the following table:

- (a) is in the service type meals; and
- (b) has the subsidy basis specified in the item; and
- (c) if the subsidy basis for the service is efficient price—has the base efficient price specified in the item; and
- (d) if the subsidy basis for the service is unit price—has the base unit price specified in the item; and
- (e) has the loading type [to be confirmed].

Servic	Services in the service type meals				
Item	Column 1 Service	Column 2 Description	Column 3 Subsidy basis	Column 4 Base efficient price or unit price	
1	Meal delivery	Delivery of pre-prepared meals, but not including the following: (a) the cost of ingredients; (b) takeaway food delivery; (c) meal delivery for other members of the household	Unit price	[TBA] (\$ per meal)	
2	Meal preparation	Support to prepare meals in the home or community, but not including the cost of ingredients	Efficient price	[TBA] (\$ per hour)	

45 Social support and community engagement

(1) A service listed and described in an item of the following table is in the service type social support and community engagement.

Services for which subsidy basis is efficient price

- (2) A service listed and described in any of items 1 to 6 of the following table:
 - (a) has the subsidy basis efficient price; and
 - (b) has the base efficient price specified in the item.

Services for which subsidy basis is cost

(3) The service listed and described in item 7 of the following table has the subsidy basis cost.

Excluded costs

(4) For items 2, 3 and 4 of the following table, the excluded costs are fees associated with participation in an activity (such as tickets, accommodation and membership fees).

Item	Column 1 Service	Column 2 Description	Column 3 Base efficient price (\$ per hour)
1	Group social support	Support in a group setting to facilitate meeting the individual's need for social contact or company and participation in community life (including diverse cultural activities), including service and activity identification and linkage	[TBA]
2	Individual social support	Support on an individual basis to facilitate meeting the individual's need for social contact or company and participation in community life (including diverse cultural activities), including the following:	[TBA]
		(a) service and activity identification and linkage;(b) assistance to participate in social interactions (in-person or online);	
		(c) visiting services, telephone and web-based check-in services;	
		but not including the excluded costs specified in subsection (4)	
3	Accompanied activities	Accompanying the individual to facilitate: (a) meeting the individual's need for social contact or company and participation in community life (including diverse cultural activities), but not including the excluded costs specified in subsection (4); or	[TBA]
		(b) the individual's attendance at medical or other appointments	

Item	Column 1	Column 2	Column 3	
	Service	Description	Base efficient price (\$ per hour)	
4	Cultural support	Culturally focused support to facilitate meeting the individual's need for social contact or company and participation in community life (including diverse cultural activities), including the following:	[TBA]	
		(a) service and activity identification and linkage;		
		(b) assistance to access translating and interpreting services and translation of information into the individual's chosen language;		
		(c) referral pathways to advocacy or community organisations;		
		(d) assistance in attending cultural and community events;		
		but not including the excluded costs specified in subsection (4)		
5	Digital education and support	Technology-focused support to facilitate meeting the individual's need for social contact or company and participation in community life (including diverse cultural activities), including provision of or assistance with access to training or direct assistance in the use of technologies to improve digital literacy to aid independence and participation (such as paying bills online, accessing telehealth services and connecting with digital social programs), but not including the purchase of smart devices for the purpose of online engagement	[TBA]	
6	Assistance to maintain personal affairs	Support for maintaining the individual's financial and legal affairs to facilitate meeting the individual's need for social contact or company and participation in community life (including diverse cultural activities), but not including service fees (such as funeral plans or accountant's fees)	[TBA]	
7	Expenses to maintain personal affairs	The cost of internet or phone bills (or both) for an individual who is homeless or is at risk of homelessness, and who needs support to maintain connection to funded aged care services	Not applicable	

47 Transport

- (1) A service listed and described in an item of the following table:
 - (a) is in the service type transport; and
 - (b) has the loading type [to be confirmed].

Services for which subsidy basis is unit price

- (2) A service listed and described in item 1 of the following table:
 - (a) has the subsidy basis unit price; and
 - (b) has the base unit price specified in the item.

Services for which subsidy basis is cost

(3) A service listed and described in item 2 of the following table has the subsidy basis cost.

Excluded things

- (4) For the items of the following table, the excluded things are the following:
 - (a) an individual's purchase of a vehicle;
 - (b) an individual's vehicle running costs;
 - (c) licence costs;
 - (d) professional transit services (such as public transport, flights or ferries);
 - (e) travel for holidays.

Item	Column 1	Column 2	
	Service	Description	Base unit price (\$ per trip)
1	Direct transport	Provision of a car and driver for group and individual transport services to connect the individual with their usual activities, and including fuel, but not including the excluded things specified in subsection (4)	[TBA]
2	Indirect transport	Provision of a service voucher for taxi or rideshare services for group and individual transport services to connect the individual with their usual activities, but not including the excluded things specified in subsection (4)	Not applicable