

Dear Aged Care Team

First of all, I'd like to express my gratitude for including counselling or psychotherapy as part of home support service types that may be available to older Australians from 1 July 2025.

CONTEXT

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I acknowledge that a prior consultation informs the service list which I didn't contribute to. This submission aims to respectfully address the following sections and highlight aspects of service provision that are relevant to practitioners of counselling or psychotherapy:

S26, p 5 – service types (a) allied health and therapy and (u) therapeutic services for independent living

S29, p 5 – provider registration categories (c) advisory and support services;

S32, pp 7-8 – allied health and therapy, Item 12 – counselling or psychotherapy

S46, pp 19-20 – therapeutic services for independent living

S48-50, pp 22-23 – other specified matters for home support service types

1. WHO IS A COUNSELLOR OR PSYCHOTHERAPIST?

I'm addressing the following aspects in relation to practitioners so that older people have confidence about this new group of providers:

Qualifications: PACFA accredits courses delivered by a number of institutions where the minimum recognised qualification is a bachelor program. Other associations may recognise a lesser course such as a diploma or advanced diploma of counselling.

Registration: A counsellor or psychotherapist is generally registered with an association, either PACFA (pacfa.org.au) or ACA (<https://theaca.net.au/>). Annual registration with PACFA, for example is conferred on the basis of meeting defined registration standards which includes:

- *Proof of identity standard:* Refers to passport, driver's licence, etc
- *Criminal history standard:* Refers to the nationally coordinated criminal history check.
- *English language skills standard:* Refers to successful completion of a tertiary qualification at AQF level 7–9 delivered in Australia.
- *Professional indemnity insurance standard:* Members can purchase insurance from PACFA's partner insurer or provide evidence of same.
- *Client contact standard:* Identifies and distinguishes client contact from other professional activities and where client consent has been obtained.
- *Clinical supervision standard:* Refers to a contractual and collaborative process between supervisor and supervisee to monitor, develop and support supervisee in their clinical role. For example, Registered Clinical Counsellors are required to

complete a minimum of 10 hours or 15 hours of clinical supervision in a 12 month period from July to June, depending on client practice hours.

- *Continuing professional development standard:* Refers to Category A and Category B of CPD activities with an annual requirement of 20 CPD hours, preferencing Cat A.
- *Ethical practice and professional conduct standard:* Determines that when initially applying for registration, a counsellor must declare that they agree to abide by the PACFA Code of Ethics and if they breach the Code, they will indemnify PACFA from any liability arising from counsellor’s actions (PACFA 2024).

RECOMMENDATION FOR AGED CARE RULES 2024:

Practitioners of counselling or psychotherapy must (a) hold a minimum qualification of a Bachelor of Counselling or Psychotherapy (AQF Level 7) or Master of Counselling or Psychotherapy (AQF Level 9) with preference for the latter, and (b) be registered with an association, preferably as Clinical Member of PACFA or highest level at ACA.

2. PRICE

AGED CARE RULES	NDIS
<p>Currently no price is determined for counselling and psychotherapy under any aged care program</p> <p>RECOMMENDATION FOR AGED CARE RULES 2024: A recommendation is to follow the NDIS guideline as a starting point</p>	<p>Therapy Supports (7 or older) 15_043_0128_1_3 Assessment Recommendation Therapy or Training - Counsellor</p> <p>Hour \$156.16 Remote \$218.62 Very remote \$234.24 (NDIS 2024)</p>
<p>RECOMMENDATION FOR AGED CARE RULES 2024: A recommendation is to follow the NDIS guideline as a starting point</p>	<p>In addition to direct service provision, practitioners can also claim for:</p> <ul style="list-style-type: none"> • Non-Face-to-Face Support Provision • Provider Travel • Short Notice Cancellation – 2 clear business days • NDIA Requested Reports <p>These support items are subject to price limits as determined by relevant support items (NDIS 2024).</p>

3. SPECIALTIES

Counsellors typically use a range of approaches or modalities such as person-centred therapy, narrative therapy, existential therapy, acceptance & commitment therapy, depending on concerns brought to sessions. Counsellors with experience in bereavement or grief counselling are relevant for a population group who experience multiple losses in their life.

RECOMMENDATION FOR AGED CARE RULES 2024:

That practitioners of counselling or psychotherapy have experience in bereavement or grief counselling or willing to obtain knowledge about same through PACFA-approved CPD or external training organisations.

4. EXPERIENCE

Counsellors typically have broad experiences of counselling or psychotherapy which may be gained in private practice or organisations that provide government-funded services such as

Carer Gateway, GambleAware, Parent Line, NDIS, etc. Counsellors with experience in working with older people, whether as carers or as people who may have dementia or mental health issues or addictions, would enhance service provision to older people living in community.

RECOMMENDATION FOR AGED CARE RULES 2024:

That practitioners of counselling or psychotherapy have a minimum of 3 years' experience in working with older people.

5. DELIVERY

Counsellors typically conduct sessions in-person but since COVID, therapy may also be online (video) or audio (telephone/mobile). The Department of Social Services has adequate evidence to demonstrate that older people can and do engage in telephone or digital counselling.

RECOMMENDATION FOR AGED CARE RULES 2024:

That practitioners of counselling or psychotherapy can deliver sessions using multi modes of delivery including in-person, video and audio sessions.

6. ACCESS TO COUNSELLORS

Counsellors typically work in private practice and may access clients in different ways, including connection with different organisations. However, to protect older people who may access counselling directly (self-managed) or through registered organisations, it may be appropriate for older people to access appropriately registered counsellors. PACFA has a 'Find a Therapist' directory (PACFA n.d.) while ACA has 'Find a Counsellor' (ACA n.d.). For example, counsellors or psychotherapists are not listed on PACFA's directory unless they are registered. The practice of accessing registered counsellors or psychotherapists aligns with NDIS' Provider Finder where only NDIS registered providers are listed (NDIS 2023).

RECOMMENDATION FOR AGED CARE RULES 2024:

That practitioners of counselling or psychotherapy are listed on the Associations' Finder and that organisations identify and utilise practitioners of counselling or psychotherapy from such directories.

7. REGISTRATION CATEGORIES & THERAPEUTIC SERVICE TYPES

The following refers to the Consultation Draft, Aged Care Rules 2024

- Section 29 - Provider registration categories (under paragraph 11(3)(b) of the Act) are prescribed as (a) home and community services; (b) assistive technology and home modifications; **(c) advisory and support services**; (d) personal and care support in the home or community; (e) nursing and transition care (DOHA, 2024, p 5). Based on my understanding, it seems that practitioners of counselling or psychotherapy will be registered under 'advisory and support services'. This registration category does not give enough credibility to the skills of practitioners of counselling or psychotherapy. See Point 1 above. Counsellors are not advisors although they may provide *therapeutic support* to people.
- Section 29 - Provider registration categories. Typically, practitioners of counselling or psychotherapy operate as sole traders similar to most allied health providers and likely to be registered with their preferred association (PACFA or ACA) which is an expensive process in terms of registration, insurance, supervision and professional development. This registration is a rigorous and annual process, in addition to random audits by PACFA. Would there be a cost to register as a practitioner of counselling or psychotherapy?

- Section 46 - therapeutic services for independent living (DOHA, 2024, pp 19-20) refers to sub-section (2) where a service “uses evidence-based techniques to manage social, mental and physical wellbeing in support of the individual remaining safe and independent at home” (DOHA, 2024, p 19). The list of services includes a range of allied health options plus art therapy but excludes counselling or psychotherapy (DOHA, 2024, p 20). We know anecdotally that exploring social connections or working through rehabilitation often demands confidence and may challenge older people’s vulnerability due to reduced mobility, for example. Older people’s wellbeing can be treated *holistically by including counselling* delivered by counsellors or psychotherapists, as a short-term option, under any relevant service option. See for example the similarity in content for therapeutic services:

S32, p 7 – allied health and therapy	S46, p 19 – therapeutic services for independent living
(2) The service requirements for a service listed and described in an item of the following table are that the service: (a) is for the individual to regain or maintain physical, functional or cognitive abilities that support the individual to remain safe and independent at home; and (b) is within the parameters specified in subsection (3); and (c) is for the management of conditions related to age-related disability or decline.	(2) For a service listed and described in the following table, the service requirements are that the service: (a) uses evidence-based techniques to manage social, mental and physical wellbeing in support of the individual remaining safe and independent at home; and (b) is within the parameters specified in subsection (3); and (c) is for the management of conditions related to age-related disability or decline; and (d) does not include relaxation massage or fees associated with participation in an activity (such as tickets, accommodation, membership fees, or supplies for an activity such as craft materials).

- Section 48-50 – other specified matters for home support service types, allied health and therapy is listed under provider registration category of ‘personal and care support in the home or community’ (DOHA, 2024, p 23). Would practitioners of counselling or psychotherapy be included in this section? If so, the inclusion under 2 different registration categories appears confusing. Perhaps I’m reading it incorrectly but clarity would be appreciated in relation to practitioners of counselling or psychotherapy.

RECOMMENDATION FOR AGED CARE RULES 2024:

- That counselling and psychotherapy is included in the list of therapeutic service types in S46, p20
- That registration categories for practitioners of counselling and psychotherapy are more clearly defined
- That clarity is provided in relation to cost of registration.

I wish to express, once again, my sincere thanks for including counselling or psychotherapy as a possible service option for older Australians. Please feel free to contact me should you wish any clarification.

SUBMISSION BY : Caroline [REDACTED]
 SUBMISSION DATE: 8 October 2024

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REFERENCES

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