

## **New Aged Care Act Rules Consultation**

Thank you for the opportunity to submit feedback on the Aged Care Act Rules – Service List as part of the Legislative Reform of aged care.

The Brotherhood of St. Laurence is a social justice organisation working alongside people experiencing disadvantage to address the fundamental causes of poverty in Australia. We believe no one should live in poverty. Our purpose is to advance a fair Australia through our leadership on policy reform, our partnerships with communities and the quality of our services.

As a service provider who works primarily with cohorts of older people experiencing disadvantage, we have the following feedback on the Rule:

1. The term ‘care management’ is used to describe activities that relate to service coordination and management, review and evaluation (of services and the care plan), monitoring, advocacy, support and education. (Chapter 1: Introduction, Part 4, Division 2, p10).

We note the shift in language from ‘case management’ as the current terminology to ‘care management’ to describe these activities. We are pleased to see a clear definition of what is intended given the common usage of such terms, and varying interpretations.

2. The BSL employs Case Managers to undertake care coordination, or care management work on behalf of clients receiving Home Care Package and Commonwealth Home Support Program services. We also engage in case management work in our philanthropically funded [Critical Interim Support pilot](#) that works to ensure at-risk older people can access the aged care services they need. In this context the case management work is intensive, hands-on and involves undertaking work to address barriers to service access.

Issues such as hoarding, distrust of authorities, financial and physical abuse, domestic violence, estranged family relationships and unmet physical and mental health needs are often intertwined. The intensive case management work addresses initial crises, guides them through the My Aged Care assessment process and works with them to ensure essential and sustainable ongoing services and supports are in place.

3. Given the complexity of needs of some older people we ask that this more traditional form of case management be included and defined in the Rules, to provide funded case management support to vulnerable cohorts that may include diversity characteristics such as (but not limited to) homelessness, culturally and linguistically diverse backgrounds, non-English speaking backgrounds, social disconnection, financial disadvantage, family and domestic violence, and indigenous backgrounds.

This case management work could be defined in addition to the care management work in the Service List, with the inclusion of intensive, hands-on support as required to enable equitable access to care services.

We would be pleased to provide further detail as required.

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