Dear Consultation Team,

We appreciate the opportunity to provide feedback on the Aged Care Rules – Release 4b and acknowledge the government's commitment to improving aged care services. However, as a local government Commonwealth Home Support Programme (CHSP) provider, we have serious concerns regarding the lack of clear details on compliance requirements—particularly in relation to approved digital platforms, worker qualifications, and public reporting obligations.

While we fully support efforts to improve transparency and service quality, the absence of practical guidance makes it extremely difficult for providers to take action. Specifically:

- Digital Systems: The requirement to use government-approved platforms lacks clarity. Without a published list of approved systems or implementation guidelines, providers cannot assess readiness, update software, or allocate resources effectively.
- Qualifications & Training: Stricter workforce requirements are outlined, but specific qualification benchmarks, training expectations, and compliance measures remain undefined. This leaves providers unable to plan staff development or ensure alignment with future standards.
- Public Reporting: Increased transparency is welcomed, yet what specific data must be shared, how it should be presented, and the mechanisms for reporting have not been clarified. Without clear directives, providers risk non-compliance or misinterpretation of obligations.

These gaps create uncertainty, delay preparedness, and increase administrative burden, preventing providers from proactively meeting the new standards. We strongly urge the Department to:

- 1. Release detailed compliance guidelines, including a definitive list of approved digital systems and corresponding transition timelines.
- 2. Clarify workforce qualification requirements with structured training expectations and assessment criteria.
- 3. Provide practical reporting guidance, specifying the scope, format, and submission process for public disclosures.

We ask that these details be made available well before the new Aged Care Act takes effect on 1 July 2025, to ensure a smooth transition for providers and minimal disruption to older Australians relying on our services.

Thank you for considering our concerns. We look forward to further clarification and stand ready to work collaboratively towards an improved aged care system.

Sincerely,

Melton City Council