



# Stage 4b Rules Consultation

Response to the Consultation Draft Rules  
May 2025



## Recommendations – 4b Draft Rules

1. Adjust references to ‘meals and refreshments’ to ‘meals, snacks and beverages’.
2. Provide specific detail regarding the requirements for the Quality Assurance Framework.
3. Adjust references to ‘continuously improve the meals and refreshments’ to ‘continuously review meals, snacks and beverages’.
4. Delay the implementation of the meal obligations until 1 July 2026.

## Discussion – 4b Draft Rules

Page	Recommendation
77	<p><u>Part 4, Division 3, Subdivision B – Requirements for delivering funded aged care services</u></p> <p>Section 148-20 refers to ‘meals and refreshments’. This term should be updated to ‘meals, snacks, and beverages’ for greater clarity. Unlike ‘refreshments’, which can be interpreted in various ways, ‘beverages’ is a universally understood term for drinks. Including ‘snacks’ also ensures consistency with the terminology used in the strengthened Aged Care Quality Standards.</p>

78	<p><b><u>Part 4, Division 3, Subdivision B – Requirements for delivering funded aged care services</u></b></p> <p>The rules in section 148-20 outline a requirement for providers to implement a ‘Quality Assurance Framework’ that considers ‘the satisfaction of individuals with the meals and refreshments they are provided’. This statement lacks detail regarding the specific obligations for in-home meal providers.</p> <p>██████████ recommends the addition of <b>detailed, specific and practical requirements for the Quality Assurance Framework</b>. We recommend that the collection of individual feedback be mandated at defined intervals and in a standardised format as part of the framework. Clear guidance would support providers in meeting their obligations consistently and with greater confidence.</p> <p>Additionally, the expectation to ‘continuously improve the meals and refreshments’ may not always be appropriate, as there may be instances where no improvement is necessary. It is recommended that this be rephrased as, ‘<b>continuously review the meals and refreshments</b>’ to better reflect a balanced and needs-based approach.</p>
77/78	<p><b><u>Timeline for New Meal Obligations</u></b></p> <p>██████████ recommends that the implementation of the new meal obligations for in-home meal providers be <b>deferred until 1 July 2026</b>. This additional time is necessary to ensure providers are adequately prepared to meet the new requirements. It will also allow time for the development of a meal assessment tool specific to the in-home care environment and the delivery of training to upskill Accredited Practicing Dietitians, ensuring that assessments are conducted in a manner that aligns with the intent of the new obligations. A thorough and considered approach to implementation will support a smoother transition and contribute to better outcomes for both providers and care recipients.</p> <p><b><u>Accredited Practicing Dietitian (APD) assessment</u></b></p> <p>The requirement for an assessment of menus by an Accredited Practicing Dietitian is a new and unexpected annual expense for meal providers. At present, there is no program comparable to the Menu and Mealtime Review Program to support in-home meal providers in meeting the requirements of the APD assessment.</p> <p>We recommend that the Department of Health and Aged Care considers <b>dedicated, ongoing funding for in-home meal providers to conduct APD menu assessments</b>, with a particular focus on those operating in rural and remote areas as well as smaller service providers. To support this, we suggest implementing a two-tiered funding model that distinguishes between small/medium providers and large providers. This would support the financial viability of a range of providers and enable them to meet their assessment obligations.</p>

## Recommendations – Meal obligations explainer

1. Adjust references to 'meals and refreshments' to 'meals, snacks and beverages'.
2. Provide standardised survey questions in the explainer document for providers to use in assessing satisfaction with meals, snacks and beverages.

## Discussion – Meal obligations explainer

Page	Recommendation
1	<p><u>Overview</u></p> <p>This document refers to 'meals and refreshments' in multiple places. The term should be updated to 'meals, snacks, and beverages' for greater clarity. Unlike 'refreshments', which can be interpreted in various ways, 'beverages' is a universally understood term for drinks. Including 'snacks' also ensures consistency with the terminology used in the strengthened Aged Care Quality Standards.</p>
2	<p><u>Quality Assurance Framework</u></p> <p>To support the objectives of the Quality Assurance Framework and to ensure accurate and meaningful feedback can be collected, the Department of Health and Aged Care should <b>provide standardised survey questions</b> to providers to assess satisfaction with meals, snacks and beverages.</p> <p>We strongly encourage the Department to engage in consultation with Dietitians Australia to facilitate the development of a standardised survey.</p>