



Submission to the Inquiry into the provisions of the Aged Care Amendment (Implementing Care Reform) Bill 2022

August 2022



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About UnitingCare Australia

UnitingCare Australia is the national body for the Uniting Church's community services network and is an agency of the Assembly of the Uniting Church in Australia.

We give voice to the Uniting Church's commitment to social justice through advocacy and by strengthening community service provision.

We are the largest network of social service providers in Australia, supporting 1.4 million people every year across urban, rural and remote communities.

We focus on articulating and meeting the needs of people at all stages of life and those that are most vulnerable.

UnitingCare Australia Submission

UnitingCare Australia welcomes the opportunity to contribute to the Senate Community Affairs Legislation Committee's Inquiry into the provisions of the Aged Care Amendment (Implementing Care Reform) Bill 2022.

UnitingCare Australia recognises and applauds the Government's prioritisation of aged care reform and the consultative footing it has taken on this priority. Similarly, we commend the Government's recent submission to the aged care industry work value case.

This primary intent of this submission is to support submissions already made by UnitingCare Queensland and the Aged & Community Care Providers Association.

Through this submission we also seek to reiterate the following key issues by schedule.

- **Schedule One** – The requirement to always have a registered nurse on-duty from 1 July 2023 will introduce greater demand on an already scarce workforce. It will also create disparate costs across facilities, favouring larger facilities. This impact will be strongest against rural and remote facilities that already struggle with staffing and do not have the ability to scale.
 - *Recommendations*
 - This policy needs to be supported by a robust Government plan, co-designed with the sector, to make more Registered Nurses available for recruitment into the aged care sector, particularly for regional and remote aged care services.
 - Additional funding, additional time to transition, and a larger workforce are required to sustain vital services, especially regional and remote services, through the introduction of this policy.
 - Wage parity with Registered Nurses in hospitals must be considered to attract nurses to the aged care sector;
 - The due date for this requirement should be extended to July 2024 to give the sector more time to attract and recruit the additional nurses; and
 - Dispensations should be available where there is evidence of bona fide, failed efforts to meet this requirement.
- **Schedule Two** – Different Home Care Package Levels are subject to detailed schedules, beyond a single pay point per level, to reflect a range of service needs. If the pricing is too narrowly prescribed then models of care will be impacted, there is also potential to undermine facilities ability to meet the aged care standards especially given other present and forecast pressures. The costs associated with service delivery are often greater outside urban and metro areas.
 - *Recommendation*
 - Home care charge caps should be scheduled in detail to reflect-
 - Home Care Package Level, and
 - Location

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- **Schedule Three** – Transparent reporting is both vital and expensive, implementation of the Quarterly Financial Reporting regime cost one agency within our network over \$1 million with ongoing compliance in excess of \$500,000.
 - *Recommendations*
 - Reporting requirements should be as efficient as possible.
 - The Department should review all Provider reporting requirements and provide funding to support transitions to new, or changes in, reporting requirements.
 - The Government should maintain close understanding of administrative costs across the range of provider types to ensure the administrative burden is minimised and care dollars are maximised.