



9 June 2016

Mr Paul Linden  
A/g Director  
Home Care Policy and Design Section

Via email: [agedcarereformenquiries@health.gov.au](mailto:agedcarereformenquiries@health.gov.au)

Dear Mr Linden

### **Increasing Choice in Home Care- Stage 1. Proposed changes to Aged Care Principles and Determinations**

The Australian Nursing and Midwifery Federation (ANMF) is the largest professional and industrial organisation in Australia for nurses and midwives, with Branches in each State and Territory of Australia. With a membership of over 250,000 nurses, midwives and assistants in nursing, the core business of the ANMF is the professional and industrial representation of our members and the professions of nursing and midwifery.

The ANMF takes a leadership role for the nursing and midwifery professions by participating in the development of policy relating to: nursing and midwifery practice, professionalism, regulation, education, training, workforce and socio-economic welfare; health and aged care, community services, veterans' affairs, workplace health and safety, industrial relations, social justice, human rights, immigration, foreign affairs and law reform.

Nurses and midwives together comprise more than half the total health workforce. They are the most geographically dispersed health professionals in this country, providing health care to people across their lifespan and in all socio-economic spheres. Approximately 30,000 ANMF members are currently employed in the aged care sector. We therefore welcome the opportunity to comment on the proposed amendments to the delegated legislation to support the implementation of the first stage of the home care reforms.

The ANMF on this occasion has chosen not to provide our feedback on the submission template but wish to comment on selected items outlined in the proposed changes.

#### **Exit fees**

The ANMF does not support a business process that includes an exit fee for consumers. A person receiving care from a particular aged care provider should not be penalised for changing providers. This imposed fee is unnecessary expenditure, to the often frail, elderly consumer. The legislation should not enable providers to charge an exit fee under any circumstances. This option should be removed from the legislation.

#### **Cessation of prioritisation determinations**

It is the understanding of the ANMF that if a person does not activate their approved package within 56 days, they can request an extended further period of 28 days. If a person still does not activate their package within this timeframe then the package would cease and their name goes back onto the wait list. The ANMF

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#### **ANMF Journals**

**Australian Nursing and  
Midwifery Journal**

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**Australian Journal of  
Advanced Nursing**

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ABN 41 816 898 298

believes this does not enable an equitable outcome for a person wanting to activate their package but is unable to find an approved provider within the allocated time period. A person living in a rural or remote setting who is struggling to find a provider to deliver their approved package should be given an exemption from these time restrictions. The package should remain allocated to them until they are able to find a provider. A person in this situation should not have further barriers to access.

Allowances must also be made for people who have specific needs such as those who require culturally specific packages. Access to these types of packages may not be available, or there may be a longer wait time due to the lack of availability or more time may be required for a package to be set up. There will need to be allowances made for this type of circumstance so these people are not disadvantaged.

### **Quality Agency Principles**

The proposed changes to the quality agency principles must ensure that providing choice in home care does not come at the expense of quality care. It is essential that there is rigour in the self-assessment required of the provider and in the Quality Agency's own procedures for investigating providers when they require further information. We caution that there are a variety of issues potentially affecting quality care that may not necessarily be identified through a self-assessment tool. Providers must be subject to transparent, enforceable quality controls. If the intent of the legislative amendments is to increase consumer choice, there should not be a concomitant decrease in the standard of care provided. We consider that further information should be provided on the process of self-assessment and suggest that new providers have automatic assessment, contact and site visit after a period of time conducting the service.

The ANMF looks forward to being involved in the ongoing changing space of the aged care sector and appreciates the opportunity to provide feedback. Should you require any further information please contact Julie Reeves, Federal Professional Officer, ANMF Federal Office, Melbourne on 03 9602 8500 or [julie@anmf.org.au](mailto:julie@anmf.org.au).

Yours sincerely



**Lee Thomas**  
Federal Secretary  
Australian Nursing and Midwifery Federation