

The Department of Social Services

# New Aged Care Short- Term Restorative Care Programme Policy Consultation Paper

Vision 2020 Australia

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## Contact

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## General comments

Vision 2020 Australia welcomes the opportunity to provide feedback to the Department of Social Services (the Department) on the New Aged Care Short-Term Restorative Care (STRC) Programme Policy Consultation Paper and congratulates the Department on the progression of this important program. With an estimate of over 575,000 people living with blindness or vision impairment across Australia, with the majority aged over 65 years and with an increasing ageing population, ensuring that the aged care system is formulated to cater for the needs of this growing group of Australians is critical.

Vision 2020 Australia broadly supports the submissions put forward by our member organisations, namely Vision Australia and sector partner Guide Dogs Australia, both of whom provide services and supports to people who are blind or vision impaired. The blindness and vision impairment sector strongly supports the key approach and philosophy of a consumer-directed care approach to aged care. Vision 2020 Australia commends the Department for their intent to transition to a culture that actively promotes independence and builds on individual strength and capacity. For eligible consumers, the STRC Programme has the potential to play a significant role in delivering intermittent services and supports to ensure the full participation of people who are blind or vision impaired in the community as equal citizens.

That being said, Vision 2020 Australia is concerned that there is a lack of clear indication about how Australians who are blind or vision impaired and aged 65 years and older, will have access to services through the new aged care system. More so, with a full complement of only 2,000 places available by 2021, Vision 2020 Australia is concerned that the STRC Programme will be insufficient to address the needs of the ageing population in need of specialist blindness services.

It is the position of Vision 2020 Australia that a specific trigger mechanism is required to identify applicants who are blind or vision impaired. This trigger will ensure an effective passage through the aged care system, by providing the option for a specialist assessment undertaken by a specialist service provider in blindness and vision impairment. Vision 2020 Australia therefore provides comment to the Department on how the STRC Programme can be adjusted to ensure that people who are blind or vision impaired are not left behind.

### Vision 2020 Australia

Vision 2020 Australia represents around 50 member organisations involved in: local and global eye care; health promotion; low vision support; vision rehabilitation; eye research; professional assistance and community support.

This submission has been developed in collaboration with the Vision 2020 Australia Independence and Participation Committee (the Committee). The Committee brings together a diverse group of members providing services and supports to people who are blind or vision impaired across Australia; enabling an unique platform for stakeholders to collaborate, foster consensus and develop a shared understanding on matters of significance affecting member organisations and consumers. It draws on the knowledge, experience, and resources of the membership and applies itself to Vision 2020 Australia's strategic goal for people who are blind or vision impaired to participate in the community. Through broad and inclusive representation, the Committee is central to supporting one of Vision 2020 Australia's key roles as an effective conduit to government, offering a unified and consistent voice.

# 1 Eligibility

## Who will be eligible to receive short-term restorative care under the STRC Programme?

### **Option 1: Access for people not receiving Commonwealth subsidised residential, home or flexible aged care.**

Vision 2020 Australia supports in principle the objectives of the STRC Programme, in particular the intent of the programme to deliver early intervention care supports to assist people over 65 regain their independence. Restorative care approaches, particularly that of reablement, resonate strongly with organisations within the blindness and vision impairment sector. Our members consider that services and support for people who are blind or vision impaired are principally about facilitating their independence and participation to maintain a high quality of life. Many of Vision 2020 Australia member organisations work to a reablement model with a focus on individual strength and capacity. Vision 2020 Australia therefore supports the roll out of the STRC Programme.

It is important to realise that people who are blind or vision impaired tend to access services infrequently, often instigated by changes to their environment, conditions or during key life transition points. The frequency and intensity of support is dependent on a range of factors. For instance, a person with vision impairment may access services intermittently to learn how to use a new piece of assistive technology. Additionally, a person who is blind or vision impaired may access services when adapting to a new home to learn their new environment and routes to local shops, public transport and work. This in turn can affect the broader health system such as reducing early hospitalisation and access to the mental health system, and delaying entry into residential aged care facilities. Thus, Vision 2020 Australia holds that the STRC Programme has the potential to play a significant role in delivering intermittent services and supports to ensure the full participation of people who are blind or vision impaired in the community.

In previous submissions to the Department on the Commonwealth Home Support Programme, Vision 2020 Australia has raised concerns that the aged care system may not adequately account for the functional needs of people who are blind or vision impaired. It is Vision 2020 Australia's position that without a specific trigger mechanism to identify applicants who are blind or vision impaired individuals will be restricted in their ability to access the specialist eye health and vision care services they need to remain independent and engaged in the community.

Additionally, Vision 2020 Australia is troubled that the primary eligibility criteria of 'frailty' in the new aged care system creates a substantial barrier for people who are blind or vision impaired to access the new scheme. A person seeking services for blindness or vision impairment in order to maintain an active lifestyle would not necessarily be 'frail.' It is the position of Vision 2020 Australia that a requirement for support on the basis of blindness or vision impairment as an individual's primary functional need should be sufficient in and of itself to allow access to the aged care system and it should not be a precondition to have comorbidities related to 'frailty' in order to access support.

Thus, in considering concerns around access to aged care, Vision 2020 Australia supports *Option 1: Access for people not receiving Commonwealth subsidised residential, home or flexible aged care*. Under this option, the STRC Programme would be utilised by people not receiving Commonwealth subsidised residential, home or flexible care. It is the position of Vision 2020 Australia that option 1 provides the opportunity to capture people who are blind or vision impaired who may otherwise be ineligible to access services through the aged care systems given the primary eligibility criteria of frailty.

Option 1 is preferred over Option 2 which stipulates that an individual is eligible if they are currently receiving Commonwealth subsidised home care. Vision 2020 Australia holds that a well-functioning home care package that has been designed with the appropriate provision for specialist assessment means that consumers should have access to the relevant supports and services for blindness and vision impairment and therefore would not require complementary care through the STRC Programme. Home care packages are designed to provide complex support for consumers and as such, the STRC Programme should be reserved for consumers who can benefit from early intervention and increase their functional capacity during key transitional life stages.

### Available packages

It is estimated that there are over 575,000 people who are currently blind or have vision loss living in Australia. Due to the ageing population and the fact that the risk of eye disease increases three-fold for each decade over the age of 40, this number is projected to grow to over 800,000 by 2020.<sup>1</sup> Figures from the Australian Bureau of Statistics 2012 *Survey of Disability, Ageing and Carers (SDAC)* indicate that prevalence of disability increases with age, as does a person's need for formal assistance. The findings uncovered higher rates of unmet need amongst those with sensory and speech disabilities at 50.2 per cent.<sup>2</sup> Results from the *Snapshot of Blindness and Low Vision Services 2013*, suggest that 90,203 clients accessed services, of which 60 per cent or 54,122 clients were aged 65 years or older.<sup>3</sup> The data is clear that people aged 65 years and over are the foremost recipients of services in the blindness and vision impairment sector. These results reiterate the urgency for the needs of older Australians who are blind or vision impaired to be recognised in the aged care system.

From 2016-17, the new short-term restorative care places will progressively become available with the full complement of 2,000 places available by 2021. This means that the balance of care types within the ratio of 125 aged care places for every 1,000 people aged 70 years or over by 2021-22 is restricted to a mere two places. Vision 2020 Australia is concerned that this limited number of places will be insufficient to address the needs of the ageing population in need of specialist blindness services. Vision 2020 Australia is disappointed at the lack of available places for the STRC Programme and holds that 2000 places is hardly adequate to address the specialised needs of Australians over 65 who are blind or vision impaired, let alone the broader ageing population who would also benefit from access.

### Specialist assessment

In considering the implementation of the STRC programme, support and services must flow quickly to a person before functioning is unnecessarily impacted. Early intervention for individuals over 65 who are blind or vision impaired is vital, so that everyday activities can be undertaken in a way that maintains and ensures an individual's safety, dignity and independence.

Vision 2020 Australia is concerned that people with blindness or vision impairment are not explicitly recognised as a special needs group within the aged care legislation. Clause 1 of Schedule 1, section 11-3 (definition of people with special needs) of the Aged Care Living Longer Living Better Act 2013 defines a person with special needs as the following:

- a. people from Aboriginal and Torres Strait Islander communities;
- b. people from culturally and linguistically diverse backgrounds;
- c. people who live in rural or remote areas;

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<sup>1</sup> The Economic Impact and Cost of Vision Loss in Australia (2010), Access Economics

<sup>2</sup> Australian Bureau Disability, Ageing and Carers, Australia: Summary of Findings, 2012 of Statistics, available at <http://www.abs.gov.au/ausstats/abs@.nsf/mf/4430.0>

<sup>3</sup> B. Ah Tong, G. Duff, G. Mullen and M. O'Neill, August 2015, A Snapshot of Blindness and Low Vision Services in Australia, Vision 2020 Australia, National Disability Services, Australian Blindness Forum, Sydney.

- d. people who are financially or socially disadvantaged;
- e. veterans;
- f. people who are homeless or at risk of becoming homeless;
- g. care leavers;
- h. parents separated from their children by forced adoption or removal;
- i. lesbian, gay, bisexual, transgender and intersex people;
- j. people of a kind (if any) specified in the Allocation Principles.

It is the position of Vision 2020 Australia that the Aged Care Living Longer Living Better Act 2013 should be amended to include people who are blind or vision impaired as a special needs group. This amendment to the legislation will ensure that places are allocated to meet the specialist needs of people who are blind or vision impaired, including identification and matching with professionals with expertise in blindness and vision impairment. Without this specific provision within the aged care legislation people who are blind or vision impaired will continue to fall through the cracks.

Additionally, in order to ensure navigation through the aged care system Vision 2020 Australia holds that a specific trigger mechanism is required to identify applicants who are blind or vision impaired. This trigger will need to ensure an effective passage through the new aged care system, by providing the option for a specialist assessment undertaken by a specialist service provider in blindness and vision impairment to substantiate the functional needs of applicants who are blind or vision impaired; and supports to meet the identified needs must be catered for within the aged care system.

Vision 2020 Australia has previously advocated that specialist knowledge regarding individual need is essentially once an individual presents to the My Aged Care Gateway. The sector considers it critical for people who are blind or vision impaired seeking support to have access to holistic specialised assessment to provide more choice, control and access to services. It is vital that a holistic specialist assessment is undertaken by trained professionals with specialist expertise in blindness and vision impairment, with a view to the person's needs so that they can remain independent and connected with the community. A holistic specialist assessment would ensure that individual need is met and that services to blind and vision impaired applicants are able to be accessed through the aged care system.

## 2 Providers

### How will STRC Programme places be allocated?

#### Option One: Approved provider of flexible care

Vision 2020 Australia welcomes the inclusion of short-term restorative care as a new kind of consumer driven care under the *Aged Care Act 1997*, and holds that that the most appropriate alignment of this new type of care is with organisations that are providers of flexible care.

It is critical to maintain the independence and community participation of people who are blind or vision impaired, and restorative care, wellness and reablement approaches are a key mechanism for achieving this. Providing access to the STRC Programme through flexible care can be understood as a preventative mechanism that can, by building participant independence, reduce or delay rates of admission into residential or home care and thereby reduce the burden on services. This is an important benefit of the STRC Programme that would be undermined by requiring that places be allocated to flexible care providers that also provide residential or home care.

Vision 2020 Australia is concerned that the aged care system does not have the capacity to cater for those with blindness or severe vision loss, as it is not geared to provide necessary supports and services such as assistive technology and mobility training to maintain independence and high quality of life. It is imperative that assessors be equipped to deal with specialist needs related to applicants who are blind or vision impaired. With the existing concerns about the lack of specialised care for blindness and vision impairment available through established residential and home care services, Vision 2020 Australia notes the STRC model can serve as a passageway for integrating specialised care as a form of short term flexible care.

Further, many organisations that specialise in providing the necessary services and supports for people with blindness and vision impairment are not providers of home or residential care. Restricting approved providers to those who also provide residential or home care would unduly exclude people with blindness or vision impairment that do not require residential or home care from accessing the STRC Programme.

In light of these considerations, Vision 2020 Australia holds that the most appropriate option for allocating STRC Programme places is *Option One: allocate places to providers who are approved providers of flexible care*. This is preferred over Option Two, which requires the approved provider of flexible care to also be a provider of either residential or home care.

### 3 Conclusion

Vision 2020 Australia remains concerned that there is a lack of clear indication about how Australians who are blind or vision impaired and aged 65 years and older, will have access to blindness and vision impairment services through the new aged care system. It is the position of Vision 2020 Australia that a specific trigger mechanism is required to identify applicants who are blind or vision impaired. This trigger will ensure an effective passage through the aged care system, by providing the option for a specialist assessment undertaken by a specialist service provider in blindness and vision impairment.

In relation to eligibility, Vision 2020 Australia supports option 1 as it presents an opportunity to capture people who are blind or vision impaired who may otherwise be ineligible to access services through the home care system. Further, in relation to service providers, Vision 2020 supports option 1 as an opportunity to ensure specialised care for blindness and vision impairment can be integrated as a form of short term flexible care.

Vision 2020 Australia is grateful to the Department of Social Services for the opportunity to comment on this important issue, and welcomes any further participation and discussion on what is an important matter for people who are blind or vision impaired.