

The Department of Social Services

Submission to Increasing Choice in Home Care - Stage 1 Discussion Paper

Vision 2020 Australia

October 2015

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General comments

Vision 2020 Australia welcomes the opportunity to put forward a submission and response to the Department of Social Services (the Department) on Increasing Choices in Home Care - Stage 1 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.

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. 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 aged care system 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.

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1 Overarching questions

Overall, what do you believe will be the impact of the proposed changes in Stage 1 on consumers and providers?

Vision 2020 Australia congratulates the Australian Government for its commitment to a new aged care system which has the potential to enrich the lives of people who are blind or vision impaired. For eligible consumers benefits include being able to choose a provider, portability of package and prioritisation based on individual not regional need. Vision 2020 Australia strongly supports the objectives and principles of a consumer directed care approach, particularly the intention to transition to a culture that provides consumers with greater flexibility and control over their individual needs.

Vision 2020 Australia does however have concerns 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 the relevant supports and services through the new aged care system, including through 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 a high quality of life. Vision 2020 Australia is concerned that Home Care Packages do not offer the specialisation or spectrum of services required to ensure that people who are blind or vision impaired are able to remain engaged within the community and live a life of their choosing. For example, Home Care Packages are not intended to be an aids and equipment scheme. Given that most people with significant vision impairment utilise assistive technology to varying degrees in order to maintain their independence and lead fulfilling lives, this is of great concern to the blindness and vision impairment sector.

Additionally, Vision 2020 Australia is concerned 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 aged care system. 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.

What type of information and support will consumers and providers require in moving to the new arrangements?

For Vision 2020 Australia’s member organisations working within the blindness and vision impairment sector, the implementation of a consumer directed care approach will be a new transition. For many of our member organisations who provide specialist support and services, and have a background in disability services, and who are relatively ‘new’ to the aged care system, it is anticipated that this will be a cultural, system, capacity and skills adjustment for the eye health and vision care sector. Vision 2020 Australia notes that service providers in the blindness and vision impairment sector will require support in terms of funding and time in transitioning to the new system as well as training to navigate the new service provider portal. It is therefore Vision 2020 Australia’s position that investment in infrastructure and training of staff to use the Department’s systems and processes will be required to support this cultural shift. Vision 2020 Australia recommends that information and training forums should begin as early as possible to provide practical training, resources and assistance to providers in moving to these new arrangements.

Additionally, Vision 2020 Australia considers it critical that content and information provided to consumers of the aged care system should be created in ways that support and maximise accessibility. In order for people who are blind or vision impaired to be empowered by a shift to person-centred support, it is of utmost importance to ensure participants have access to specific and appropriate information to assist with making an informed decision. It is preferable for accessibility that information, such as the Home Care Today booklet, is available in large print, Braille, and audio/CD formats.

Vision 2020 Australia notes that the Australian Government has endorsed the Web Content Accessibility Guidelines (WCAG) version 2.0 AA rating for all government websites. Vision 2020 Australia recommends that the Department develop information relating to the new aged care system in accordance with these guidelines, considering the varied needs of users, and plan for accessibility from the outset; noting that not all people who are blind or vision impaired access information in the same way and that many individuals have a preferred format. Vision 2020 Australia also encourages the Department to involve organisations in the eye health and vision care sector in the development of an information sharing system, to ensure expert knowledge on accessibility needs is available and utilised.

What additional information and support will the assessment workforce require in the lead up to February 2017?

Vision 2020 Australia's primary concern is whether the Aged Care Assessment Team (ACAT) will be equipped to deal with specialist need within the blindness and vision impairment sector. The experience of our members working within the blindness and vision impairment sector is that detection and response to blindness within the aged care system is not sufficient. Advice from our members is that consumers are not receiving specialist input or assessment from practitioners such as orthoptists or allied health professionals. It is Vision 2020 Australia's contention that the current National Screening and Assessment Form (NSAF) question on blindness is inadequate and advice from our members is that it is not used at the screening level. In light of these issues it is Vision 2020 Australia's position that a specific trigger mechanism is required to identify applicants who are blind or vision impaired. This trigger should 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. This would lead to a more accurate assessment of current and functional needs and appropriate expenditure.

Vision 2020 Australia believes that expert advisers, such as accredited professionals like orientation and mobility instructors, have the potential to play a significant role in matching a participant's need with the most appropriate supports. An independent third party with specialist knowledge of the participant's disability and relevant supports should be available to provide guidance on what supports will be reasonable and necessary to achieve the participant's goals. In order to achieve this, experts should take a holistic approach, with attention to all aspects of the person's need and circumstances.

Vision 2020 Australia's position on holistic specialist assessment is instructive here. Vision 2020 Australia has previously advocated that specialist knowledge regarding individual need is essential once an individual presents to the 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 Access to home care

Making packages available to consumers based on individual need

Vision 2020 Australia supports in principle the transition to an approach that makes packages available through a nationally centralised gateway based on consumers' individual needs. The blindness and vision impairment sector favours a model of aged care that promotes individual choice. Transitioning to a culture in which consumers will no longer be restricted in their choice of providers will reduce red tape for consumers and ensure that they are able to remain engaged with their community and live a life of their choosing.

Vision 2020 Australia is pleased that a national approach to aged care will provide an opportunity to address unmet need through reducing waiting periods and improving access to home care across Australia. Recent figures from the Australian Bureau of Statistics *2012 Survey of Disability, Ageing and Carers (SDAC)* indicate that there is a high rate of unmet need amongst individuals with sensory and speech disabilities, at 50.2 per cent.¹ In order to ensure that people who are blind or vision impaired are able to remain engaged within the community and independent, it is absolutely critical that consumers have access to supports quickly once the need is identified. In order to reduce waiting periods and address the burden of unmet need, Vision 2020 Australia considers it essential that appropriate monitoring and reporting mechanisms are in place to guarantee mutual accountability and transparency.

There are approximately 73,000 operational home care packages available across Australia, with an additional 6,000 new packages expected to be allocated through the 2015 Aged Care Approvals Round. Vision 2020 Australia is concerned that the limited number of packages available through the aged care system will be insufficient to address the needs of an ageing population in need of specialist blindness services. According to results from the *Snapshot of Blindness and Low Vision Services* reported for 2013, 90,203 clients accessed services in 2013, of which 60 per cent were aged 65 years or older. 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.²

Prioritising package access

Early intervention

Early intervention is a vital aspect of service provision for Vision 2020 Australia members, aiming to slow or halt vision decline and maintain independence for people who are blind or vision impaired. Early expert assessment and care planning to mitigate the functional impact of diagnosed conditions can allow people with vision impairment to retain their independence and reduce dependence on aged care supports. It is the position of Vision 2020 Australia that cases should be prioritised for access where it is evident that early intervention will lead to significant outcomes such as better vision or better functionality.

¹ 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>

² 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.

Comorbidities

People that have blindness or vision impairment as well as other presenting conditions should be prioritised for access to home care packages. People who have vision loss along with comorbid conditions face serious barriers to health, ability to perform tasks and to participate in social roles.³ The presence of multiple health conditions in conjunction with vision loss compromises functional capacity, with research demonstrating that people over 65 with vision loss and comorbidities experience greater difficulty walking, climbing steps, shopping and socialising.⁴ Vision 2020 Australia holds that in prioritising package access, consideration should be given to prioritising access for people experiencing comorbid conditions that exacerbate their functional decline in association with their blindness or vision impairment.

Safety

It is the position of Vision 2020 Australia that risk assessments should be conducted for each applicant so that those deemed less safe while waiting should be prioritised for access to home care packages. Data from *Clear Focus: The Economic Impact of Vision Loss in Australia* in 2010 shows that vision loss prevents healthy and independent ageing and is associated with: a doubled risk of falls; a tripled risk of depression; a four to eight fold increase in risk of hip fractures; a doubling of likelihood to use health services; and admission to nursing homes three years early.⁵ People with blindness and vision impairment can benefit from interventions including aid and equipment to enhance their vision or improve their functionality. Prioritisation of people who are assessed as being less safe while waiting is an important risk mitigation strategy that should be implemented by the Department.

Timeframe for commencing care

Vision 2020 Australia holds that the timeframe for commencing care must strike a balance between encouraging early intervention and unduly restricting access for people who may access services intermittently. It is important to realise that people who are blind or vision impaired often access services intermittently, with service use 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 who is vision impaired may access services intermittently to learn how to use a new piece of assistive technology; while a person with a degenerative eye condition may need constant service provision as they adjust to their constantly changing level of vision. Intermittent service access patterns do not mean that people with blindness or low vision have a lower need for support; rather this indicates a need for flexible and responsive service provision.

It is therefore imperative that a specified timeframe for a consumer to commence care must be long enough to ensure the inclusion of people who have not accessed services recently. Vision 2020 Australia member organisations advise that it is not uncommon for clients to come in and out of contact over a three year period. At minimum, Vision 2020 Australia therefore recommends a timeframe of no less than three years from the time a consumer has been notified that a package has been assigned to them, to account for episodic access to services and supports for people who are blind or vision impaired.

³ Crews, JE et al. (2006) 'Double jeopardy: the effects of comorbid conditions among older people with vision loss.' *Journal of Visual Impairment and Blindness* 100: 824-848.

⁴ Ibid.

⁵ Vision 2020 Australia by Access Economics Pty Limited, *Clear Focus: The Economic Impact of Vision Loss in Australia* in 2009, June 2010.

Interim care arrangements

Vision 2020 Australia supports the suggestion that where the consumer's approved level of package is not available, My Aged Care should assign the consumer a lower level package as an interim arrangement. It is however the position of Vision 2020 Australia that this interim package should be provided to the same financial level that would have been delivered had the higher level package been available. Vision 2020 Australia further notes that the Department must implement a safeguard mechanism to ensure that service providers do not use the interim care arrangement as a way of rationing services.

Unspent funds when a consumer moves to another home care provider

Vision 2020 Australia supports the proposal that when a consumer moves to another home care provider any unspent funds would move with the consumer to the new provider, applying from the date of notice less relevant costs for services and supports already supplied. This approach supports the consumer directed care principles underlying the reforms to the aged care system. Vision 2020 Australia holds that this option promotes choice and control for consumers, encouraging individuals to access the most suitable supports and services with the capacity to meet their needs. This consumer directed care arrangement will encourage best practice among service providers.

Unspent funds when a consumer leaves subsidised home

Vision 2020 Australia supports option 3A: that unspent funds are apportioned between the consumer and the Commonwealth and returned to each party by the approved provider, who is required to identify the exact amount of unspent funds from each contributor based on actual contributions during the period of care. Vision 2020 Australia holds that this option is fair and equitable and that the approved provider is best placed to apportion funds between the two entities.

How might the criteria relating to the assessment of approved providers (Section 803 of the *Aged Care Act 1997* and the *Approved Provider Principles 2014*) be adjusted to better reflect expectations around the suitability of an organisation to provide aged care?

Vision 2020 Australia supports the approach of providing greater choice for consumers by increasing the number of approved providers for providing home care. The proposed 'opt-in' approach would reduce red tape for service providers and increase choice for consumers. However, with the introduction of the National Disability Insurance Scheme (NDIS) and support being provided to individuals below the age of 65 years old, the aged care sector now needs to respond better to the needs of older people who have acquired a disability.

Vision 2020 Australia notes that high risk and specialised service provision should be protected for delivery by specialised services. Specialised services are best placed to provide the appropriate care for people with blindness and vision impairment, with a lack of relevant expertise on blindness and vision impairment among generalised aged care services.

Vision 2020 Australia therefore holds that a clause should be included in the *Approved Provider Principles* to specify that where the approved provider does not have expertise in providing care for a specific disability such as blindness or vision impairment, that the approved provider will be required to engage with an expert advisor to determine the most reasonable and necessary support pathway.

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.

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.