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State or territory:	New South Wales
Organisation name: (Enter N/A if this does not apply to you)	Dementia Australia
Your role: (Enter N/A if this question does not apply to you)	General Manager Policy and Advocacy
Which statement best describes your involvement with aged care?	I am from a peak body or similar organisation
What perspective do you represent?	People receiving care / aged care residents
If you work for a residential aged care provider, what type of organisation do you represent?	N/A
Are you located in a rural or remote area?	No
Are you a member of, or do you represent or provide specialist care to any of the following groups? (tick multiple)	People with dementia
Have you heard of the Independent Health and Aged Care Pricing Authority (IHACPA) or the Independent Hospital Pricing Authority (IHPA) prior to this public consultation?	Yes
How did you hear about this consultation?	Department of Health and Aged Care Newsletter Alert
What, if any, may be the challenges in using the Australian National Aged Care Classification (AN-ACC) to support activity based funding (ABF) in residential aged care?	A key challenge is that the practical application of how the AC-ACC supports quality care for people living with dementia is yet to be determined. AN-ACC should pick up the functional, behavioural and clinical support that people with dementia might need but this is uncharted territory and initial assumptions have been made on the basis of current models of care, which are not always consistent in providing quality dementia care.

<p>What, if any, concerns do you have about the ability of AN-ACC to support long-term improvement in the delivery of residential aged care in Australia that is efficient, sustainable and safe?</p>	<p>Dementia Australia acknowledges the logic underpinning the AN-ACC but it is important that the pricing authority notes that dementia is not yet core business for the sector. The way that cognitive impairment is reflected in the pricing (and the way in which it facilitates quality dementia care) will need to be monitored. For example, activity and costing data on reablement/rehabilitation for people with dementia may be underrepresented in the first instance, because it is neither regularly applied to people with dementia nor will any higher costs that may be associated with delivering such care to people with dementia necessarily be reflected in the first tranche of activity. Similarly, it will be important to monitor how care minutes are implemented and what impact this has on the quality of care provided to people living with dementia. The pricing of allied health and behaviour management, in particular, will need to be significant enough to improve the quality of care from what we have now.</p>
<p>What, if any, additional factors should be considered in determining the AN-ACC national weighted activity unit (NWAU) weightings for residents?</p>	<p>The lack of a specific class for dementia in the NWAU is a compounding factor. Dementia Australia will be monitoring how that is reflected in pricing and how it correlates to quality dementia care.</p>
<p>What should be considered in developing future refinements to the AN-ACC assessment and funding model?</p>	<p>We will need to consider whether the care needs of people with dementia are appropriately met through the AN-ACC classifications and pricing, and consider whether adjustments for cognitive impairment may be needed.</p>
<p>What, if any, changes do you suggest to the proposed principles to guide the development and operation of the Pricing Framework for Australian Aged Care Services?</p>	<p>Overall Dementia Australia supports the proposed principles but notes that they do not address how to promote or facilitate quality care for residents.</p>
<p>What, if any, additional principles should be included in the pricing principles for aged care services?</p>	<p>NULL</p>
<p>What, if any, issues do you see in defining the overarching, process and system design principles?</p>	<p>NULL</p>
<p>What, if any, concerns do you have about this definition of a residential aged care price?</p>	<p>The focus on an average price that can drive efficiencies is concerning in an environment where quality dementia care is variable. The aged care reforms are focused on better care, transparency and regulation – all of which will take more time than less. Dementia Australia recommends the pricing authority takes this sector re-adjustment into account and not hamper it by constraining prices so that providers make more cuts to staff or services.</p>
<p>What, if any, additional aspects should be covered by the residential aged care price?</p>	<p>NULL</p>

What, if any, concerns do you have about the proposed pricing approach and level of the residential aged care price?	NULL
How should 'cost-based' and 'best practice' pricing approaches be balanced in the short-term and longer-term development path of the Independent Health and Aged Care Pricing Authority (IHACPA)'s residential aged care pricing advice?	NULL
What should be considered in the development of an indexation methodology for the residential aged care price?	The methodology will need to consider wages growth in order to see practice change.
What, if any, additional issues do you see in developing the recommended residential aged care price?	NULL
What, if any, changes are required to the proposed approach to adjustments?	We do not think any changes are required to the proposed approach to adjustments, but we will monitor how the process plays out for people impacted by dementia.
What, if any, additional adjustments may be needed to address higher costs of care related to the resident characteristics?	NULL
What evidence can be provided to support any additional adjustments related to people receiving care?	NULL
What should be considered in reviewing the adjustments based on facility location and remoteness?	NULL
What evidence can be provided to support any additional adjustments for unavoidable facility factors?	NULL

How should any adjustments for quality and safety issues be considered in the long-term development path of AN-ACC and the associated adjustments?	NULL
Should hotel costs be incorporated into the AN-ACC funding model and what should be considered in doing this?	Dementia Australia would support hotel costs being considered in the future. The separation is somewhat arbitrary, and the physical environment is an important component to the quality of dementia care.
What should be considered in future refinements to the residential respite classification and funding model?	NULL
What are the costs associated with transitioning a new permanent resident into residential aged care?	NULL
How might workforce challenges present in the implementation and refinement of AN-ACC for the aged care system?	The shortage of appropriately trained staff is important factor. Poorly trained staff may take less time and offer poorer quality of care to people living with dementia. Dementia Australia strongly advocates for compulsory dementia education for all aged care staff.
What areas should be included in the proposed five-year vision for IHACPA's aged care pricing advice?	NULL
What would be considered markers of success in IHACPA's aged care costing and pricing work?	NULL
Other comments	Dementia Australia is supportive of independent pricing that is regularly updated to ensure that the cost of care is better reflected in pricing – both for consumers and for the sector more broadly.
Please indicate if there are specific sections of your submission that you wish to remain confidential and the reasons for this.	NULL
I consent to IHACPA contacting me for further information or clarification about my submission.	Yes, I consent
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