

18 October 2022

Independent Health and Aged Care Pricing Authority

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To Whom It May Concern,

The Older Persons Advocacy Network (OPAN) welcomes the opportunity to respond to the “Towards an Aged Care Pricing Framework Consultation Paper”. This short submission recognises OPAN’s role is primarily to provide a voice to older people and the views from their perspective on their experiences of aged care. Therefore, we flag that we are not financing model experts. To this end we have focused our response on the principles for activity-based funding (ABF) in aged care.

OPAN is a national network comprising nine state and territory Service Delivery Organisations (SDOs) that have been successfully delivering aged care advocacy, information, and education services to older Australians for over 30 years.

OPAN’s free, independent services support older people, their families, and their representatives to address issues related to Commonwealth-funded aged care services. OPAN is funded by the Australian Government to deliver the National Aged Care Advocacy Program (NACAP). We aim to provide a national voice for aged care advocacy and promote excellence and national consistency in the delivery of advocacy services under the NACAP.

We are always on the side of the older person we are supporting. OPAN is independent of aged care services and provides a mechanism for ensuring the rights of older people are upheld, that they receive safe and high-quality care tailored to their individual needs and preferences, and that they continue to have autonomy and choice as they age.

We seek to bring forward the voice of the older person who has presented their issues to our advocates and advocacy services. OPAN also has knowledge and expertise through the OPAN National Older Persons Reference Group (NOPRG), our member organisations’ aged care advocates, and the collective experiences of the leadership of our member organisations and secretariat.

OPAN supports a principles-based approach being taken to funding and financing aged care. Our feedback on the proposed principles is as follows:

OPAN member organisations by state or territory:

ACT



SA



VIC



NSW



NT - Top End



QLD



TAS



WA



NT - Central



- Access to care must include equitable access in terms of affordability (especially for those that have limited or no capacity to pay), availability (in terms of location and/or for specific diversity groups and/or needed services) and accessibility. In addition, the model of financing needs to specifically support those who have challenges engaging, or are unable to engage, or face barriers to engaging with the mainstream aged care system.
- Quality care – this must be more than meeting the aged care standards. Quality is shaped by varying factors including consumer experience, ongoing quality improvement processes, complaints, and quality indicators to name a few. This includes ensuring there is appropriate funding and support for the implementation of reforms and cultural change, and building in human rights into aged care practice, in this transition period towards transformation and reform.
- Fairness – must include recognition that access to services in some areas, particularly rural and remote, and for some older people, including those from diverse and marginalised groups and with intersectional complex needs will require different methods, and higher levels of financing to ensure equitable access for older people and sustainability for aged care providers.
- Efficiency – OPAN supports the definition that the ABF should ensure the sustainability of the aged care system over time and optimise the value of the public investment in aged care. There must be levers and mechanisms within the funding and resource distribution models to help support these goals. In supporting efficiency, the ABF model must support innovations in the longer term which drive efficiency and return on investment.
- Maintaining agreed roles and responsibilities – OPAN also supports that the ABF design should recognise the complementary responsibilities of each government agency and department in the funding and management of aged care services, as well as providers in delivering aged care services.

OPAN’s experience of supporting older people, families, and representatives through COVID-19 (and approved aged care providers) has highlighted the costs of preparation and preparedness in relation to infection prevention and control, as well as implementing balanced and proportionate public health and safety measures. This highlights for us the need to pre-plan the funding of these measures and that any future funding model needs to incorporate the community expectation on the provider for these preparatory and response measures. We flag the community expectation that future funding and ABF models anticipate this requirement which was missing prior to the COVID-19 pandemic. There will of course need to be appropriate transparency and reporting mechanisms to show this investment has been appropriately directed.

OPAN would also argue that, in alignment with a move to a rights-based aged care system the pricing framework should also enshrine a human-rights approach within funding/financing parameters and levels provided to the aged care system in Australia. In addition, social justice and protecting vulnerable older Australians must underpin funding levels and pricing frameworks to provide for their aged care into the future.

OPAN is supportive of the process principles and the system design principles listed within the consultation paper.

As noted above, OPAN’s role is speaking for the needs and rights of older people based on their voice. Older people express the need to have services that are safe and of high quality, and meet their wishes and preferences, at levels of care and in the locations they require. OPAN supports bringing in a pricing framework that helps achieve these needs and ensures the sustainability of aged care.

If you require further information, please do not hesitate to contact me, Craig Gear, on craig.gear@open.com.au or 0410 695 659

Yours Sincerely



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OPAN