

26 October 2007

Disability Supported Accommodation
PO Box 7442
CANBERRA BC ACT 2610

Dear Sir/Madam

I write in response to the call for comment on the creation of the Disability Supported Accommodation Program (DSAP).

Aged & Community Services Australia (ACSA) is interested in this area as a number of aged care organisations provide accommodation and/or care services to people with disabilities and their carers. As carers age many more aged care services are coming into contact with people with disabilities and the interface with disability services.

Aged and Community Services Australia (ACSA) is the leading national peak body for aged and community care providers and represents around 1,200 church, charitable and community-based organisations providing housing and supported accommodation, residential and community care services to over 700,000 older people, younger people with a disability and their carers.

ACSA members make up about two-thirds of Australia's rapidly growing \$7 billion aged and community care industry. They provide 50,000 retirement village units across Australia, making ACSA the largest industry body representing the retirement village sector.

ACSA's submission does not respond to all of the consultation questions but provides some general comment on the initiative and focuses on a number of key service provision areas.

General Comments

The provision of supported accommodation for people with disabilities is critical and clearly there is not enough available to meet existing needs. ACSA welcomes the Australian Government's recognition of this issue and in particular its targeting to assist older carers who are often supporting ageing disabled adult children. The creation of the DSAP will create a focus and provide much needed additional resources in this area. However the creation of a new and separate funding program to meet both capital and support need costs will bring additional complexity to an already complicated service system. This makes it more difficult for people (clients) to navigate the system and increases co-ordination, administration and reporting costs for service providers reducing the availability of resources for service delivery.

This program will be Commonwealth funded, along with a range of aged care services and supports, while the majority of disability programs are state based. Potentially this program will contribute to the Commonwealth/State jurisdictional issues already being experienced by clients and aged and disability organisations who are attempting to support people with disabilities who are ageing and their carers. These issues between Commonwealth and State must still be addressed if effective services and support are to be provided for this group of clients. Creating separate programs to avoid addressing such issues is at best a short term fix.

A key planning component in establishing the program will be to identify and consider the interface issues with the myriad of programs – including aged care, HACC, NRCP and State disability programs to manage service system complexity and individual eligibility issues.

Supported Accommodation Providers

ACSA would support enabling the full range of non government organisations with experience and expertise in providing accommodation, including aged care services, to be eligible for DSAP funding. The requirement to provide a person centered approach will be a key criteria for all service providers to demonstrate and meet.

As the consultation paper suggests there should be a range of different accommodation models available to support people. ACSA believes the focus should be on individualised support services and small group/cluster housing or shared accommodation. Such smaller group or cluster housing however, could be delivered within larger accommodation settings which may achieve cost efficiencies for service delivery.

Program Roll out/Funding

Attention must be paid to both the capital and support elements proposed as part of this program.

There must be clear and workable financial arrangements for capital establishment as well as ongoing maintenance and upgrade costs. The ongoing capital element in such programs is often overlooked or inadequately funded in Government programs. This threatens the ongoing viability of the services it establishes.

The funding element for support services needs to be defined and the links with complementary programs clarified. Realistic timelines for services to become operational must take into account time required for:

- Planning, building and/or purchasing and modification cycles;
- Recruitment and training requirements;
- Compliance costs e.g. police checks; and
- Working with clients and families to enable smooth transitions.

Funding should enable providers to meet universal design principles, incorporate assistive technology in design and delivery, furnishings and vehicles as required.

Ongoing funding must be indexed adequately. The aged care sector has suffered from a steady erosion in the value of Government payments for care as a result of the use of the inappropriate COPO index.

The additional costs of service delivery in rural and remote areas and for CALD populations should also be taken into account in developing the funding model. ACSA has undertaken some work in this area, as it relates to residential and community aged care services and this is attached for your information and consideration.

Financial Contributions

ACSA supports clients making a financial contribution to the services they receive. An important principle however is that no one should be denied access to a service due to an inability to pay the fee. In addition to this service providers cannot and should not be required to bear the cost of the client not being able to pay as this can affect equity and viability. In residential aged care services the Government pays where clients are unable to and this should be incorporated into DSAP program design.

ACSA will maintain its interest in the establishment of this program and trusts that these comments will be useful in designing a model which avoids the short comings of existing funding models.

Yours sincerely,

Greg Mundy
Chief Executive Officer