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8 March, 2011

Caring for Older Australians
Productivity Commission
PO Box 1428
Canberra City ACT 2601

Dear Commissioners,

Re: Productivity Commission's *Caring for Older Australians* Draft Report

I am writing in relation to The College of Nursing's response to the Productivity Commission's *Caring for Older Australians* Draft Report.

The College applauds the work of the Commission in preparing such a comprehensive report which has identified and responded to the many structural weaknesses, both from a consumer and provider perspective in the current Aged Care System.

We strongly support all of the Commission's recommendations recognising that a planned program of implementation will be required given the significant nature of most of the recommendations.

We have a number of specific comments in relation to the *Care and Support* and *Workforce* sections of the draft report, which is detailed below:

Care and Support

The establishment of the Australian Seniors Gateway Agency should resolve the many issues facing the aged and their carers as they negotiate their way into the system.

We understand that 'care coordination' would be the responsibility of the gateway agency and that 'case management' would be the responsibility of the organisation. It would be helpful if this could be further expanded in the report so that the roles are clearly delineated.

The College of Nursing supports the notion of 'in reach' services and the visiting health care teams and would again highlight the potential for Nurse Practitioner Services to participate in these roles.



We note that there is some discussion in the report about linked electronic health records which would assist in the interface between health and aged care. However, there is no specific recommendation identified.

In our original submission we highlighted the need for recognition of the benefit that Advanced Care Directives (ACD) would have in the overall Advanced Care Planning Process (ACP). We are disappointed that there is no mention of ACD in the draft report, while acknowledging that this element could be part of the care coordination and case management roles.

Workforce

While the College supports the principle of regulation of workers providing 'care', it also recognises the complexity of this issue. In the first instance, therefore, we would like to see a recommendation about the need for accreditation of educational programs that lead to a 'care' qualification to ensure national consistency of the programs and also an improved level of competency of the unregulated worker.

The College also believes that an agreed staff : resident staffing level which incorporates an appropriate skill mix for the resident mix is an important tool in ensuring quality care and staff satisfaction. It is also recognised that issues around staffing mix and levels will not be entirely addressed with a simple mathematical ratio of staff : resident being put in place. Addressing this issue may require a comprehensive review of 'care' requirements and associated models of care/staffing skill mix. The College would be happy to participate in such a review.

We look forward to the next stage of the process and the release of the final report.

We are very happy to participate in any way that would assist you in further progressing this matter.

Yours sincerely,

Tracey Osmond
Chief Executive