

30 April 2013

The Director, Aged Care Providers Policy  
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Dear Director

### **Re: Comments on Discussion Paper – Accommodation Pricing Guidelines for Residential Aged Care**

National Seniors Australia is pleased to provide the following comments regarding accommodation pricing guidelines for use by providers of aged care residential facilities.

National Seniors is the largest organisation representing Australians aged 50 and over, with 200,000 members nation-wide. It provides a well-informed and representative voice on behalf of older Australians and contributes to public education, debate and community consultation on issues of direct relevance to them.

National Seniors strongly believes that it is essential to protect the assets of residents and for the use of those assets to be accounted for in a transparent manner. Residents of approved aged care facilities have the right to be fully informed of the criteria against which the accommodation payments that will be required of them are established.

Too many residents have faced a lottery for entry to residential care and in extreme cases some have been exposed to bidding wars in situations where demand exceeded supply, with the highest bidder of accommodation bonds gaining a bed.

National Seniors is supportive of the establishment of an Aged Care Pricing Commissioner as included in the *Living Longer Living Better* Bill currently before Parliament. The ability to bring concerns regarding the level of accommodation payments before the Commissioner will enhance consumers' perceptions of accountability and transparency.

The publishing of accommodation prices in advance against a set of agreed criteria will enhance comparability between providers and justify accommodation payments asked of residents. It will also educate

residents, their carers and families, and the community of the real value of the accommodation and hospitality services that are provided.

Understanding of the complex arrangements for payment of the accommodation payments will be greatly enhanced by the requirement for providers to also publish prices in the form of a daily accommodation payment, refundable accommodation payment and at least two worked examples of combination payments.

The factors proposed for consideration in setting and proposing prices across levels of accommodation payment will enable prospective residents to assess the hospitality standards and the environment in which they may reside. Quality and privacy of the room, quality and scope of common areas and location of the facility are all clearly explained.

Other factors relevant to price could be expanded to include examples of "specific design or service considerations" to enhance comparability between rooms and facilities. Universal design; internet access and equipment such as DVD players in rooms and common areas; communal entertainment; and support for special needs eg garden design and staff skill sets to cater for clients with dementia, mental health, culturally and linguistically diverse needs or experiencing homelessness and addictions.

National Seniors also supports the requirement to publish a Key Features Statement describing particular features of each room type and the facility. In addition to the features listed, this statement should also include the size of the facility eg total number of beds, extra services and additional amenities routinely offered, and local market factors such as market price of homes, units and construction costs.

Thank you for the opportunity to comment on the accommodation pricing guidelines and to present the views of our members on this very important issue. If you have any queries regarding the above feedback, please contact our senior policy adviser Marie Skinner, on 07 3233 9108.

Yours sincerely

**Michael O'Neill**  
**Chief Executive Officer**