

20 December 2013

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Dear MsCull

Exposure Drafts - Application Form and Guide for seeking approval of refundable accommodation payments above \$550,000.

National Seniors Australia is pleased to have the opportunity to provide the following comments on the exposure drafts of the Application Form and Guide for setting accommodation payments above the maximum level of \$550,000 as approved by the Minister.

With 200,000 individual fee paying members, National Seniors is the country's largest organisation representing those aged 50 years and older. Our membership includes people in the workforce, those who receive an age pension, as well as part and full self-funded retirees. This broad-base enables National Seniors to contribute to public debate and community consultation on issues of direct relevance to this age cohort.

Our members have a keen interest in matters relating to aged care services. The Draft Application Form – Accommodation Payments (Application Form) and the Draft Application Guide (the Guide) appear to include key indicators of quality of the accommodation and justification for setting accommodation payments above the maximum level of \$550,000 as approved by the Minister.

These documents have also addressed previous concerns about the excessive level of detail required in earlier drafts to support the requests to charge higher accommodation payments.

The Draft Application Form provides flexibility to providers who need to establish their claim for approval of a higher refundable accommodation payment. It allows for a variety of supporting material and evidence to be provided which addresses the requirements outlined in the Draft Guide and the Checklists.

The Quality, Condition and Amenity section of the Guide contains examples of information to be provided as evidence of the standard of the accommodation. However it is important that Information and

Communication Technology examples are included in this section as their inclusion may demonstrate a higher level of amenity for residents, and hence justify a higher accommodation payment.

Although the Guide provides an explanation of the categories of information and evidence that would support price and cost of supply considerations, it would be much easier to understand the requirements if the Guide headings were clearly related to the Application Form headings.

Therefore a few suggestions are provided that would make the Application Form easier to complete.

- Clarity and consistency would be improved by organising the information in the Guide under the same Part headings as in the Application Form: Part 1 Background Information and Part 2 Proposed Price and Costing Considerations.
- The above change would also assist in removing the confusion that may occur with cross-references to several Tables and Section numbers between the two documents.
- The Application Form would flow more logically if the Cost Considerations were placed first as Table 2.1 and the Proposed Price Considerations were second as Table 2.2 (noting this may be addressed in other formats). The Annexure checklists with Specifications in Table A-1 and Quality, Condition and Amenity items in Table A-2 would follow Table 2.2 to ensure the evidence for the Price Considerations met all requirements.
- The Guide has Part 3 Principal Accommodation Features but this heading appears nowhere in the Draft Application Form. It could replace the Annexure A heading to improve consistency.
- Although a minor issue, the section references should be exactly the same in each document eg on page 4 of the Draft Application Form a reference is given to section 3.2 (i) of the Guide rather than section 3.2.1 which appears to contain the information in question.

Thank you for the opportunity to comment on the draft Application Form and the Guide relating to aged care Accommodation prices which require the approval of the Aged Care Pricing Commissioner.

Yours sincerely

Michael O'Neill
Chief Executive Officer