

OPAN Response to Options for Assessing Performance Against Aged Care Quality Standards

21 April 2017

Questions about how service provider performance is assessed against the aged care draft standards

What are the features of the existing assessment and monitoring process that should be retained?

OPAN suggests the following features of the existing assessment and monitoring processes be retained:

- Consumer consultation - The current process has mechanisms for involving the consumer in the quality assessment. OPAN considers consumer consultation to be an essential feature of any new quality assessment process for aged care. OPAN does however, have a number of suggestions (as detailed in question 11) about how the current consumer consultation process can be improved.
- Regular reviews - OPAN considers the review process adopted in the residential care accreditation process to be a strength of the current process. The quality of care can fluctuate significantly during a three-year accreditation cycle, especially when organisations experience a change in management. Regular reviews can encourage organisations to consider quality improvement more frequently. OPAN recommends that regular monitoring and review be applied to all aged care services, not just residential care.
- Unannounced visits - Unannounced visits have the potential to allow for a more realistic quality snapshot to be captured. Although, in OPAN's experience, announced visit does not come as a surprise to many organisation. This is especially so in regional areas where news travels fast about the agency being in town. OPAN recommends that unannounced visits be applied to all aged care services, not just residential care. OPAN also recommends that consideration be given to how unannounced visits can remain unannounced in regional areas.

What are the features of the existing assessment and monitoring process that need to be changed?

OPAN suggests the following features of the existing assessment and monitoring process require change:

- Consumer Consultations Methods - OPAN has concerns about the current methodologies adopted for consumer consultations and suggests that consumers could be more effectively involved in the quality assessment process with the adoption of the following strategies:
 - o All consumers and their carers/representatives receive clear advice of upcoming quality audits along with an invitation to participate.
 - o Organisations do not deliver this advice/invitation to consumers, the Department manages this to ensure that advice/invitation remains impartial.
 - o The information needs to clearly describe the consultation process and the types of questions they may be asked and reiterate that the participation is confidential and they can participate without fear of retribution.
 - o Options to engage via telephone or a digital consultation process should be offered as an alternative method for tech savvy consumers and carers/representatives to participate. The online option may increase the ability of carers/representatives who are engaged in the workforce or other family commitments to participate.
 - o Consumers must be taken off site when providing feedback. It is essential that consumers feel safe to share their feedback. When taken off site consumers should be provided with free transport.
 - o Selection of clients should be random. Currently there is a tendency for providers to pick “compliant” consumers to participate in consultations.
 - o Auditors specifically trained in engaging consumers should take the lead in consumer audits.
 - o Consultations could be set up to evaluate or inform specific issues that are perceived by the Agency to be of a concern.
 - o Options for one on one consultations and groups consultations should be offered to consumers. Some consumers worry that other participants in a group consultation will inform the organisation about the feedback they have provided.
 - o Consumers should be offered access to interpreters.
 - o Nonverbal consumers should be encouraged/supported to engage through the use of appropriate communication tools.
 - o Consultations must adopt culturally appropriate practices.
- Published results - OPAN recommends that publicly available information outlining organisational performance against the quality standards would assist in informing consumer choice and driving competition within the market. OPAN suggests that methods used for publishing this information should include rating systems such as a star rating system. The star system is easy to understand and allows consumers to obtain a quick overview of an organisations performance. This method also provides organisations with a positive incentive to engage in quality improvement as positive results offer a credible point of difference with competitors and can be incorporated into marketing strategies and

MAC listings. OPAN recommends that the rating system should also provide consumers with more detailed information where requested including searchable reports with at a glance reading systems.

- Framework - OPAN recommends the framework adopted for the assessment of performance against the Aged Care Quality Standards be strengths based. The quality process needs to be presented to organisations as a positive experience with a focus on opportunities for continuous quality improvement rather than the current focus on compliance.

Ideally, audits and announced visits should be embraced as an opportunity to receive constructive feedback and engage in positive change, rather than something that is feared. This cannot be achieved without a change in language. For example, “we are coming to see how great you are doing” as opposed to “we want to see what you are doing wrong”.

Questions about the Options Proposed

Which option do you prefer? Please give reasons.

Option 2 with Option 3

Reasons for preferred option:

OPAN does not recommend Option 1. OPAN suggests that Option 1 will continue to burden organisations with multiple/duplicated assessment processes. OPAN recommends the adoption of a more streamlined quality assessment process, which frees up organisational funds and resources for the consumer. OPAN also has concern that this Option does not give sufficient consideration to the process applied to NATSIFACP organisations.

OPAN considers the advantages of Option 2 to be:

- Consistency - the consistent approach to assessing quality across all aged care services will reduce regulatory burden for organisations and will provide consumers with a consistent message about quality expectations throughout the aged care journey.
- Relevancy of standards - only assessing organisations against the standards that are relevant to them is a suitable approach.
- Flexibility- OPAN welcomes the acknowledgement that risk can change over time and that assessment methods should be adjusted accordingly.
- Consideration of other Accreditation Schemes – OPAN agrees that organisations who have already achieved accreditation through other relevant schemes (i.e. disability standards) should be considered a low risk. Mutual recognition of ‘like’ quality schemes should be adopted.

OPAN has identified some concerns with Option 2 including:

- Risk focused – OPAN is concerned that Option 2’s strong focus on managing high risk services may compromise the opportunity for continuous quality improvement in low risk services. OPAN maintains that low risk does not translate to high quality and is concerned that quality improvement for low risk services such as social and lifestyle services may be neglected. OPAN suggests that experienced and professional risk

assessors develop a risk framework which would include clearly outlined criteria identifying risk levels and categories and robust methods and systems for data capture etc.

- Reactive approach – OPAN notes that Option 2 approach is somewhat reactive. For example, it is suggested that compliance monitoring may be triggered if there is a failure, impacts a consumer or the public or Aged Care Complaints Commissioner reports an incidence. Whilst OPAN does agree that action should be taken in these circumstances, OPAN would maintain that a focusing on quality improvements primarily when the system breaks down is dangerous. OPAN encourages the adoption of a proactive review process for all aged care services with a focus on continuous quality improvement.
- Performance history – OPAN holds some concerns about the suggestion that organisation who have a history of high performance against the standards will undergo a less rigorous review process. This approach is not supportive of the concept of continuous quality improvement and fails to recognise that an organisations level of quality can change dramatically with a change in management.
- Impact on smaller organisations - OPAN acknowledges that the introduction of a new streamlined assessment process as proposed in Option 2 will impact smaller organisations and organisations who are providers of NATSIFACP. OPAN expects that these organisations will require a sufficient amount of time, training and support when transitioning to the new system. Supports may include user manuals, regular information sessions and a responsive, dedicated telephone helpline and/or real-time support through webchat.

OPAN also suggests that the impact on smaller organisation may also be reduced if Option 2 was coupled with Option 3.

OPAN considers Option 3 to be a suitable approach for:

- smaller contractors that do not have direct contact with consumers such equipment repair services.
- small volunteer based services such as Meals on Wheels
- services offering a single service type such as transport.

OPAN's concerns regarding Option 3 include:

- The potential for consumers to be exploited by unscrupulous organisations that go unnoticed as a low risk service provider. OPAN believes that organisations subject to Option 3 should be required to provide solid evidence e.g. copies of police clearances, insurance certificates, appropriate policies and procedures, risk frameworks etc. before they are approved as a provider. This could be done by an independent third party contracted by the government.

- The risk associated with organisations under Option 3 only being required to provide a quality declaration. OPAN considers it essential that mechanisms be put in place to ensure that all quality declarations are validated.

OPAN considers a ‘mutual recognition’ approach also be adopted to other quality systems held by Option 3 services. OPAN considers it essential that that the consumers of Option 3 eligible organisations receive information and support to access advocacy services. OPAN recommends that Option 3 organisation be required to provide evidence of providing information on advocacy to consumers. The provision of advocacy support to these consumers offers an independent and well established means for ensuring that consumers rights are respected.

OPAN supports the following features listed as common to all options:

- Greater consumer involvement in the assessment process.
- The suggestion that the agency will work with consumers, organisations and aged care specialists to develop and test a set structured consumer interview questions. OPAN would welcome the opportunity to be involved the development and testing of consumer interview questions.
- The proposal that there would be greater capacity for organisations to use evidence from other accreditation schemes to demonstrate their performance against the standards. OPAN recommends that mutual recognition across health, disability and aged care standards also be introduced.

OPAN has concerns about the following assessment options that have been suggested as approaches common to all options:

- Self-assessments – it has been suggested that high performing organisations could submit self-assessment to the Quality Agency (with or without public disclosure of the assessment) as an alternative to some site visits. OPAN maintains that self-assessment requires a thorough mechanism for validation.
- Self-disclosure - it has also been suggested that “organisation could ‘opt in’ to proactively disclose issues related to their performance on an ongoing basis to the Quality Agency and/or the public. For example, they could report adverse events in real time, report complaints and the organisations response to complaints or carry out regular/continuous self-assessment against the aged care standards. In return for such a high level of self-disclosure less intensive external assessment process may be appropriate”. OPAN has serious concerns about this approach and questions how the information disclosed will be validated. OPAN also questions how the reporting of adverse events, which presumably aligns with mandatory reporting, would result in an organisation requiring less intensive approach to quality assessment/improvement.

Please provide details of any other options that we should consider.

OPAN has no further suggestions for alternative options.

Will your preferred option/s maintain appropriate safeguards for consumers? Please explain your answer.

As mentioned previously, OPAN does have concerns about the safe guards put in place for consumers receiving services that are considered as low risk.

Will your preferred option/s decrease the regulatory burden on aged care organisations? Please explain your answer.

OPAN believes that the introduction of a single set of quality standards, the streamlining of assessment process across all aged care services and the recognition of accreditation against other relevant standards will reduce regulatory burden for many aged care organisations. OPAN is concerned that the regulatory burden may increase for organisations providing NATSIFACP. OPAN feels that the Options Paper does not give enough consideration to how NATSIFACP organisations will be supported to transition to this new and more complex system.

Other Comments

Do you have any other comments or specific suggestions about the matters discussed in the Options Paper?

OPAN recommends

- that consideration be given to the establishment of an Advisory Council to the Minister to advise initially on the effect of the transition to the new framework, and then on an ongoing basis, on any compliance, quality or other matters. The Council should be a representative mix of consumers and service providers and completely independent of the Department of Health.
- the establishment of a mechanism for the sharing of innovation and best practices between aged care organisations.
- formal support mechanisms be established for organisations who are not meeting the standards.
- A thorough training program be developed for quality assessors to ensure all assessors have knowledge and skills across the whole aged care system, and skills appropriate to engage with consumers.