



6th November 2009

Mr K Tracey-Patte
Assistant Secretary
Community Programs Branch
Ageing and Aged Care Division
Department of Health and Ageing
GPO Box 9848
CANBERRA ACT 2001

Dear Keith,

This letter is to follow up on the discussions we have been having about the current Day Therapy Centre (DTC) application process, new Guidelines and Funding Agreement. ACSA has appreciated your willingness to discuss the issues and your agreement to extend the closing date for applications.

A number of issues relating to changes in both the Funding Agreement and the Guidelines are detailed in the attached paper. This is provided as requested to assist in your considerations of the impact of these changes and the action required.

The changes in both documents amount to an increase in the 'red tape' associated with the DTC Program. Pre approvals for purchases, any other income sources, fees above \$7/session, new services/service types and program developments, use of agency staff on each occasion are all being introduced along with notification of any complaint in writing within 48 hours of receipt. This is excessive and inefficient. Combined they will increase the administrative costs of running DTCs and ultimately impact on the level of service that can be provided to older people. Any delays in receiving required departmental approvals will significantly disrupt daily service delivery. ACSA urges the Department to review all of these requirements and only introduce those which are necessary for the provision of high quality therapy services for older people.

The very short lead times and lack of consultation for the application process and introduction of new guidelines will create unreasonable workloads for organisations. While it is acknowledged that DHA will now provide funding for 2 years, as opposed to the annual uncertainty that has surrounded DTC's, there should have been some advance notice of the application process to enable industry to prepare.

In addition the application came with revised Guidelines on which there had been no consultation. Previous guidelines have been in place since 1998 while various reviews have occurred. Industry has been calling for a partnership approach to the review and renewal of this important program throughout that time. Consultation on the revised program guidelines should occur before they are implemented. Once consultation has occurred and new requirements for the Program are finalised there should be a fair and proper process to enable organisations to comply. It is suggested that an effective implementation date, 3 to 6 months from the date they are advised, should be provided.

It is important that the Department respond to these issues and advise industry quickly as the outcomes may affect organisational decisions on whether to apply for funding.

I am happy to continue our discussion of these issues to ensure a satisfactory resolution is reached. Please do not hesitate to contact me on (03) 9686 3460 or 0410 492 235.

Day Therapy Centres play an important and unique role in the continuum of care for older people. ACSA looks forward to working with you to ensure that action taken now strengthens the DTC Program and puts these services in the best possible position to support and respond to the important reforms planned in community care and more broadly through the national health and hospitals reform agenda.

Yours sincerely

A handwritten signature in black ink that reads "Pat Sparrow". The signature is written in a cursive style and is followed by a long, horizontal, slightly curved line that extends to the right.

PAT SPARROW
National Policy Manager