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## EXPANSION OF THE NATIONAL AGED CARE MANDATORY QUALITY INDICATOR PROGRAM

The Australian Physiotherapy Association (APA) has participated in two workshops on the expansion of the National Aged Care Mandatory Quality Indicator (QI) Program, represented by APA National Gerontology Chair Joanna Tan. Consequently, we do not propose to make a detailed submission to the *Expansion of the National Aged Care Mandatory Quality Indicator Program* paper consultation but to summarise and reiterate feedback already provided.

The APA has called for the introduction of detailed data capture and reporting of physiotherapy services in residential aged care aligned to clinical assessment.

Transparent, meaningful reporting will ensure access to quality healthcare for residents by enabling industry benchmarking of need to inform service provision, pricing and funding decisions.

In the absence of appropriate clinical assessment, it is unclear how the proposed QI - based on total case mix adjusted hours (per resident per day) - may identify appropriate levels of individual allied health profession staffing requirements.

Similarly, an aggregated QI encompassing all allied health professions will not deliver the level of detail required for meaningful improvement. The proposed allied health QI does not specify the:

- profession that delivered the service or the interventions delivered
- level of care each resident received as opposed to an average across the facility; and
- outcome of care.

Further, evidence-based health care such as physiotherapy should be included in the structural aspects of all mandatory QIs. Physiotherapy has a clear diagnostic, prevention, treatment and management role across all QIs but is not referred to specifically. A separate aggregated allied health QI has the potential to further diminish understanding of the importance of individual services such as physiotherapy meeting all aspects of care and all mandated QIs, nor give consumers clarity about the services they should have access to.

Given the mandatory allied health QI is not enforceable and will be used to predominantly inform the Star Ratings, it may be insufficient in addressing the issues affecting delivery of allied health services in residential aged care – most importantly, the lack of clinical assessment of need.

The consultation paper recognises that there is limited international and Australian data demonstrating optimal levels of allied health service provision based on outcomes. The APA recommends that a multi-disciplinary care pilot should be undertaken to inform the development of future data capture and reporting mechanisms before they are introduced.

The introduction of a clinical assessment tool supported by mandated, targeted funding for the provision of needs-based allied health services, accurately recorded and reported, is the solution.

Physiotherapists make up the largest allied health workforce in aged care. The APA would welcome the opportunity to participate in the National Aged Care Mandatory Quality Indicator Program Technical Advisory Group (QI TAG). Should you require any further information, please contact Simon Tatz, General Manager Policy and Government Relations, on 0402 613 745 or [simon.tatz@australian.physio](mailto:simon.tatz@australian.physio).

Yours sincerely,

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