

Aged Care Act Rules 4b consultation

Dementia Australia submission May 2025

Thank you for the opportunity to comment on the final Aged Care Rules draft. Dementia Australia remains concerned that significant issues related to the model of care for people living with dementia require further attention.

Dementia Australia recommends that the Department of Health and Aged Care:

- 1) Review factors which may be affecting access to care for people living with dementia, including whether the funding model reflects the true cost of care and how sector capability to provide quality care for people with changed behaviour can be improved.
- 2) Include personal care in the clinical care classification in the new Support at Home program.
- 3) Communicate to the sector how the support needs of people living with dementia should be assessed and funded in new Support at Home classifications, following the removal of the Dementia and Cognition supplement.
- 4) Include people living with younger onset dementia who have high support needs in an exceptional cases pathway to access residential aged care and specialist dementia support where their care needs are unable to be met in the disability system.
- 5) Ensure that the Rules require public reporting from aged care providers in relation to applications for care which have not been accepted, cessation of services and workforce development expenditure.

Entry, access and prioritisation

Dementia Australia is concerned that people living with dementia who have more complex care and support needs frequently have difficulty accessing residential aged care services.

We are aware of recent media reports that people living with dementia may not be accepted into residential aged care if additional resources and staffing are required to meet their needs.¹ We have similarly heard feedback from carers and family members about difficulties in accessing appropriate residential aged care for people living with dementia who have high support needs.

Dementia Australia is concerned that current AN-ACC modelling and implementation may be inadvertently disincentivising aged care providers to accept and sustain care for people living

¹ Neeland, J. 2024. [Cherry-picking: how aged care funding influences facility resident selection](#). Hello Care, 13 August 2024.

with dementia, especially when additional resources are required to meet complex needs such as changed behaviours.

We recommend that the Department review factors which may be affecting access to care for people living with dementia, including whether the funding model reflects the true cost of care, and how sector capability to provide quality care for people with changed behaviour can be improved.

Support at Home classifications and funding model

The currently proposed Support at Home classifications, including the lower subsidy basis for non-clinical care, may disadvantage people living with dementia, for whom independence and everyday living services are essential care.

We note increasing concern from the home care sector about the implementation of the Support at Home classifications and their potential to impact negatively on quality of care.²

Dementia Australia recommends that, at a minimum, personal care be classified as clinical care in the new Support at Home program.

We also recommend that the Department clarify to the sector how the support needs of people living with dementia will be assessed and funded in the new Support at Home program classification system, following the removal of the Dementia and Cognition Supplement.

The Dementia and Cognition Supplement assists providers with the cost of caring for people with moderate to severe symptoms of dementia. It is essential that providers and members of the public understand how the new classification system should be implemented in relation to dementia care needs, so that there are no financial disincentives to provide the care that is needed.

Access for younger people

Dementia Australia supports the development of age-appropriate models of care in the disability sector for younger people living with dementia. However, the disability sector currently has immature capacity to provide accommodation support to people living with younger onset dementia with severe symptoms and changed behaviour.

People living with younger onset dementia often struggle to access appropriate care, and this may be more acute in regional and rural areas. In these contexts, and where no other solutions are possible, it is important that pathways to residential aged care exist for exceptional cases, to provide accommodation and care for people living with younger onset dementia with high support needs.

Notably, it is currently not possible for people living with younger onset dementia to access specialist care in the Special Dementia Care Program or the Severe Behaviour Response

² Australian Ageing Agenda. 2025.

SaH providers call for action on funding model.

Team, unless they are already an aged care participant. There are no equivalent services in the disability sector.

Dementia Australia recommends that people living with younger onset dementia who have high support needs be included in an exceptional cases pathway to access residential aged care and specialist dementia support services where support is not available in disability sector.

Transparency and reporting

Improved transparency and reporting will be essential following implementation of the new Aged Care Act so that outcomes can be effectively monitored.

Dementia Australia recommends that the System Governor require reporting from aged care providers in relation to applications for care which have not been accepted and cessation of services. This will assist with safeguarding rights under the Aged Care Act, and support system improvement in relation to policy and funding for care.

We also recommend that the System Governor require public reporting from aged care providers on workforce development expenditure, to facilitate review and evaluation of investment in dementia workforce capability.

Dementia Australia is grateful for the opportunity to contribute to the draft Aged Care Rules 4b consultation and would be pleased to continue discussion on these matters at your convenience. The Dementia Australia Policy and Advocacy team can be reached at [**policyteam@dementia.org.au**](mailto:policyteam@dementia.org.au)