

30 November 2023

Josh Maldon  
Assistant Secretary  
ICT Strategy and Business Assurance  
Department of Health and Aged Care  
GPO Box 9848,  
Canberra ACT 2601  
[Josh.Maldon@health.gov.au](mailto:Josh.Maldon@health.gov.au)

Dear Josh,

**RE: Draft Aged Care Data and Digital Strategy**

The Aged and Community Care Providers Association (ACCPA) welcomes the development of the *Aged Care Data and Digital Strategy* (the Strategy).

We are pleased that the previous two documents, the Data Strategy developed by the Australian Institute Health and Welfare (AIHW) and the Digital Strategy developed by the Australian Digital Health Agency (ADHA), have now been combined into one document. This is logical given the two issues are interconnected (digital health not only supports connected care, but also helps address aged care data gaps) and should not be addressed in isolation. It will also likely reduce the potential confusion among providers during the implementation stage that may otherwise have occurred if there were two separate strategies with similar intended outcomes.

ACCPA acknowledges the many benefits that the application of digital health technology may bring to improve service quality, efficiency and equity for older Australians receiving aged care. Digital health technologies can enable the right information to be available in the right place at the right time, improving communication and connection between services. Particularly, using digital health technology may help improve:

- access to users' health information to support clinical decision making, patient safety and continuity of care;
- the ability to provide patient-centred care, responsive to the health status, needs and preferences of health care users;
- diagnostic accuracy and treatment through decision support systems that provide prompts and alerts, and screening of individuals by risk or health status;
- the provision of quality care through remote monitoring, consultation, diagnosis and treatment using telemedicine and telehealth; and
- productivity and efficiency through streamlined processes, reduced waiting times, and reduced duplicate testing.<sup>1</sup>

However, in considering implementation, it is important that the Strategy takes into account the ongoing barriers preventing full digital health adoption among aged care providers across Australia and that action plans are developed to overcome these. ACCPA has over 1100 members and there is significant variation in digital maturity, which is often influenced by the financial viability challenges facing the sector – reducing scope to invest in the systems and the skill sets needed to harness digital opportunities.

---

<sup>1</sup> LASA (2021) Submission to Digital Health Strategy

These include:

- Lack of integrated software systems - A study<sup>2</sup> conducted by the Aged Care Industry Information Technology Council (ACIITC) shows that only 14% of aged care providers are using fully integrated software systems.
- Barriers to utilisation of digital health that included poor digital literacy among staff, lack of data interoperability, lack of trust in the technology, knowledge of available technology, and legacy IT systems.<sup>3</sup>
- Other barriers included lack of return on investment (ROI) and reimbursement, lack of or unclear governance standards, poor workflow integration, insufficient or lack of training, data management and response (e.g., security, liability and procedures), funding for access to hardware, workplace culture, technical limitations (e.g., Wi-Fi capabilities) and misconceptions about older people and technology use.<sup>4</sup>

**R1. Consider developing action plans and related funding opportunities to address the ongoing barriers preventing full digital health adoption among aged care providers across Australia.**

The following are ACCPA's comments on the specific aspects of the Strategy.

**Vision statement**

ACCPA supports the vision statement, "Our vision is to deliver the highest quality person centred care for older people while driving a sustainable and productive care and support economy through data and digital innovation. We recognise that data and digital are enablers to improving care and wellbeing. This is also a key goal of the draft Care and Support Economy Strategy. Better data and stronger digital foundations will support older people and enable the sector to provide better quality care."

However, considering that "trusted" is one of the key principles for the Strategy, we recommend that the vision statement be strengthened by incorporating a statement highlighting safe and effective use/sharing of data to drive better health and aged care outcomes for older Australians.

**R2. Strengthen the vision statement by highlighting 'safe and effective use/sharing of data to drive better health and aged care outcomes for older Australians'.**

**Outcome Statements**

ACCPA supports the approach that the development and implementation of the Strategy will be based on four focussed outcomes against which progress can be measured.

*Outcome 1: Older people and their support networks can navigate and actively participate in their care and well-being.*

- *Promote healthy ageing, independence and choice* – in addition to the identified action areas under this strategic priority, ACCPA recommends the inclusion/establishment of digital health navigators (i.e., people who assist older people and others to use digital health systems) as an action area for the Strategy. This would complement the key action area related to digital and health literacy.
- *Create simplified, user-friendly experiences* – ACCPA is pleased to note that a rural and remote digital inclusion plan has been included as an action area. We recommend that a

<sup>2</sup> ACIITC (2020) Innovation driving care systems capability [ACIITC-Care-IT-Report-FINAL-13112020.pdf](#)

<sup>3</sup> [Global Centre for Modern Ageing \(gcma.net.au\)](#)

<sup>4</sup> [Global Centre for Modern Ageing \(gcma.net.au\)](#)

First Nations people digital inclusion plan should also be included as an action area under this strategic priority.

**R3. Include establishment of digital health navigators and development of a First Nations people digital inclusion plan as action areas under Outcome 1.**

*Outcome 2: Aged care workers, service providers and health professionals are digitally empowered to provide higher quality, and better-connected, care.*

- *Maximise time for direct care* – ACCPA supports the identified action areas under this strategic priority. However, the Strategy must ensure that any amalgamated records are built on defined Standards, to ensure the accuracy and consistency of data/information to support quality and connected aged care.
- *Strengthen care connections* – we note that the work around the implementation and support for the My Health Record (MHR) has focused on residential aged care. There is a need for the MHR system to be integrated into the Home Care Clinical Information Systems to support older people receiving care via the support at home program. This should be identified as one of the action areas under this strategic priority.

**R4. Include the integration of My Health Record into the Home Care Clinical Information Systems to support older people receiving care via the support at home program as an action area under Outcome 2.**

*Outcome 3: Data is shared and reused securely to deliver a sustainable and continually improving aged care system.*

- *Improve security and access control* – the Strategy needs to align with the new *Aged Care Act*, which is due to commence in July 2024. Additionally, the Strategy also needs to align with the *Health Identifiers Act* (to support connected care) and the *Privacy Act* (to ensure the safety of data collected).
- *Optimise data collection and utilisation* - we support action areas identified under this strategic priority that focus development of information and data Standards which is key to ensuring the quality and consistency of data and information to support decision-making (see ACCPA's comment regarding maximise time for direct care above).

Additionally, with AN-ACC being rolled-out from 1 October 2022, ACCPA recommends that an evaluation group should be established to work on replacement of MAC with AN-ACC data, including development of imputed variables to support common analysis (e.g. some indication of dementia status). Consideration should also be given to whether assessors need to collect additional variables.

**R5. Align the Strategy with the new *Aged Care Act*, *Health Identifiers Act* and the *Privacy Act*, as action areas under Outcome 3.**

**R6. Consider establishing an evaluation group to to work on replacement of MAC with AN-ACC data, including development of imputed variables to support common analysis (e.g. some indication of dementia status) as an action area under Outcome 3.**

*Outcome 4: Modern data and digital foundations underpin a collaborative, standards-based care system.*

- *Build and embed data and digital maturity* – ACCPA supports action areas under this strategic priority that include API-first design, API standards, digital system reference architecture and messaging standards.
- *Encourage innovation and provide stewardship* - Digital health interventions have enormous potential as scalable tools to improve health and healthcare delivery by improving effectiveness, efficiency, accessibility, safety, and personalisation. Achieving these improvements requires a cumulative knowledge base to inform development and deployment of digital health interventions and evaluation is key to this process.

While ACCPA acknowledges that evaluations of digital health interventions can be very challenging, there is a need for the benchmarking the aged care sector to track progress against strategic priorities highlighted above. Importantly, an Evaluation Framework will need to be developed for Strategy and the Department must ensure that the aged care sector is consulted to inform the development of the proposed Evaluation Framework.

**R7. Include the development of an Evaluation Framework (in collaboration with the aged care sector) to monitor progress of the implementation of the Strategy as an action area under Outcome 4.**

**Additional comments**

With various reforms being rolled out by the Government, it is critical that the Strategy not only aligns with current reform processes, but also with other strategies which are being developed or implemented (e.g. the Primary Healthcare 10-Year Plan). This will ensure the data needs of these initiatives will be appropriately considered and reflected in the Strategy.

Importantly, digitisation and improvements in data collection will require legislative changes to harmonise Federal and State/Territory legislation, as well as potentially significant investment. Such investment is likely to yield significant benefits in the longer term, as improved data collection will lead to improvements in government policies and health outcomes for older Australians.

If you have any further questions or would like to discuss, please contact Dr Moe Mahat at [Mohamad.Mahat@accpa.asn.au](mailto:Mohamad.Mahat@accpa.asn.au).

Yours sincerely,

Roald Versteeg  
General Manager, Policy and Advocacy  
Aged & Community Care Providers Association