

Des Graham
Associate Professor, Director
Office for the Community Sector
Department of Health and Human Services
GPO Box 125 Hobart TAS 7001

3 November 2008

Dear Associate Prof. Graham,

RE: TasCOSS' response to the OCS Quality and Safety Framework proposal.

The Tasmanian Council of Social Service (TasCOSS) is the peak for community service organisations and provides a voice for low income and disadvantaged Tasmanians. TasCOSS has drawn on the expertise and experience of our members as well as formally consulting our members as part of our research in preparing this response. This response provides some general points, addresses the principles and the model, points related to successful implementation of the model, and raises some questions that should be considered in the design and implementation of this process.

General

TasCOSS welcomes the implementation of a quality improvement framework as an important mechanism for providing quality assurance to clients and consumers, funders and the general public, and as a key strategy for assisting community organisations to develop responsive organisational cultures founded on continual improvement.

TasCOSS maintains that adequate time taken to implement the framework and support for organisations to build their capacity to implement these changes is essential to ensuring the success of this welcome reform.

Principles

TasCOSS supports the principles stated at 3.0 of the proposal.

TasCOSS notes the statement of commitments / requirements from funded organisations and suggests the addition of a similar set of commitments / requirements for the DHHS Office for Community Sector and relevant business units. This addition will provide greater clarity in performance expectations, roles and responsibilities and thus enable each party to work together to ensure the effectiveness of the framework.

Model for implementation

4.0 and 4.3 Assessment and accreditation

The formula for measuring risk (level of investment x service type) that comprises quality continuum for identifying the level of quality improvement activity required by funded services is not easily applied to organisations. It requires further clarification to support organisations to identify where on the quality continuum they will fall. This is particularly the case for small – medium funded organisations.

While TasCOSS acknowledges the complexity of the assessment process, it is nevertheless the critical entry point for all funded services into the quality and safety framework, thus the assessment principles and criteria will need to be clear, consistent and able to be consistently applied.

4.1, 4.2 and 4.3 Standards and Client Outcomes

TasCOSS suggests that only those standards frameworks that are built on continual improvement and client/consumer engagement are approved within this framework. TasCOSS is concerned that in practice the Quality and Safety Framework may focus on risks management at the expense of quality improvement. Consumer / client participation as an essential required standard will ensure the client's welfare and positive outcomes are retained at the centre of the DHHS and the service providers attention.

5.0 Monitoring

TasCOSS emphasises that this framework should align with existing quality assurance and quality improvement requirements already established through other state and commonwealth funding programs to minimise the duplication and additional administrative burden on organisations already reporting on quality and safety activity.

TasCOSS suggests an additional dot point for the purposes of the framework – “Identifying and responding to emerging and/ or unmet need”.

TasCOSS raises the concern about the impact of this level of monitoring activity on the DHHS internal resources. It is not clear whether the proposed frequency, that is quarterly monitoring of all funded services, will be achievable or in fact deliver greater effectiveness than for example 6-monthly monitoring incorporating both core and desktop review. This is particularly the case for the quarterly desk top reviews which suggests a high level of information flow between the OCS, business units and funded services.

TasCOSS suggests that monitoring client / consumer satisfaction is not, on its own, necessarily a reliable measure of impact or outcome for the client / consumer. This issue has been considered carefully through the Disability Services Quality project that has developed some sensitive solutions to this dilemma which TasCOSS suggest may be useful in determining a more effective set of measures for client outcome.

5.1.3 Element 3 Service Review

TasCOSS seeks clarification about the policy relationship between the broader performance management process and the quality and safety monitoring process. TasCOSS is aware that the OCS is shifting the performance management and funding formula focus to outcomes and indicators (from inputs and outputs) and that this is currently being explored through the Integrated Finance and Performance Management

reform. The relationship between the two elements should be clear and work together to support community service organisations performance.

Additionally, TasCOSS suggests that the triggers for Element 3 (Service Review) be clearly identified and stated through the policy framework that will support the quality and safety framework.

6.0 Incidents / complaints (EIMS)

TasCOSS is concerned about the appropriateness of the incident reporting proposal (EIMS):

- The process responses to level 1 and 2 events can be captured through funding agreements, and for many organisations are already captured through operational and due process for this level of incident. Similarly the review and investigation process within the DHHS can be captured in DHHS policy.
- The administrative requirements for levels 3 and 4 duplicate internal operational complaints and incident handling procedures. This is operational level data and not necessarily appropriate or sufficiently useful as to require additional monitoring by the DHHS.

Additionally, TasCOSS is concerned about the high level of resources and infrastructure that would be required to implement EIMS across over 240 funded organisations, and the resources required within the DHHS to monitor and manage the process.

How will it impact on organisations

TasCOSS welcomes the OCS acknowledgement that there will be a need for support for most community organisations to implement formal quality and safety activity.

In addition, when assessing impact on organisations the introduction of the quality and safety framework must be considered in the broader context in which community organisations will be required to implement significant reforms in organisational processes before July 2009. These include contracting, performance management, reporting, quality and safety assurance and service delivery (for example in disability, family support, mental health and alcohol and other drug programs).

TasCOSS maintains that there are three dimensions of cost for community organisations implementing this framework:

- Human resources (time) to research, identify and implement appropriate standards frameworks
- Human resources (time and skills) ongoing, to oversee, monitor and implement formal quality and safety activity, in particular where formal accreditation is required. Importantly this applies all funded services regardless of size and scale.
- Human resources (additional staff) to maintain contracted output levels and meeting ongoing client demand while implementing this, as one aspect of a range of State Government reforms.

TasCOSS emphasises that the OCS is strategically placed to ensure excellent communication and coordination takes place across the DHHS and to ensure the range of DHHS driven reforms are co ordinated, well-planned, complementary and resourced.

In turn this will assist community organisations to implement reform effectively and, further, will assist in minimising risks to client outcomes associated with a high volume of significant change and reform on a short timeframe.

We look forward to seeing the final quality and safety framework. We hope that the issues we have raised are useful for refining and improving the proposal, and assist in the effective implementation of a quality and safety framework across community organisations that supports the continual development of responsive quality services and positive outcomes for clients and consumer of community support services.

Kind regards,

A handwritten signature in black ink, appearing to read 'Tom Muller', written in a cursive style.

Tom Muller
CEO
TasCOSS