



Proposal for a Victorian Carers Reward Card – Options for the  
implementation and delivery of the card

A submission by Carers Victoria

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## Introduction

Carers Victoria appreciates the opportunity to comment on the options outlined for this important government initiative.

Our feedback will address a number of important issues. These include

- The importance of mechanisms which actively demonstrate government recognition of the significant contribution made by unpaid family carers and provides meaningful benefits. The contribution made by carers may incur significant costs to their health and wellbeing, finances, and opportunities for participation in employment and community life.
- The importance of developing a carer card which can be harmonised with provisions in other states and which has potential to strongly contribute to cross jurisdictional agreements and nationally consistent strategies to provide improved benefits for carers.
- An analysis of the strengths and weaknesses of the options outlined in the consultation paper.
- Valued benefits and rewards.
- Some important contextual issues:
  - Eligibility – defining numbers of eligible recipients
  - Definitional issues such as co residency
  - Naming the card

## The importance of carer recognition

Community care is reliant on the work of unpaid carers, particularly primary carers of whom 71% are women. The current levels of government support available to primary carers are insufficient to give carers the assistance they need, or to allow them to make real choices in relation to the level of their involvement. While the various income security payments form a safety net for primary carers who are unable to continue to participate in employment or who need to reduce their participation due to caring responsibilities, the majority of partnered unpaid women carers are ineligible for income security payments as a consequence of the income and assets test. While the Carer Allowance recognises the contribution of eligible unpaid primary carers, it is not accompanied by mechanisms which recognise the additional costs of care, or the additional costs of disability.

In the recent House of Representatives Inquiry into Better Support for Carers, the overwhelming response from the many carers who submitted was that their work be recognised and their contribution valued through improved access to income support, greater assistance with meeting the additional costs of disability and care and improved access to services and supports. While reforms to income security benefits and other financial assistance mechanisms are required at Commonwealth level, the Victorian carer card needs to provide practical measures to provide financial benefit and assistance to primary carers.

## Harmonising provisions for carers across jurisdictions

In recent years there has been considerable attention given to harmonising state services and supports to ensure a greater degree of national consistency. This work is reflected in a raft of different initiatives. For example, the Companion Card has been franchised for consistent delivery between the states; the provision of Seniors Cards in each state and territory are complementary and allow access to transport and other concessions outside the home state; there is considerable consistency between state government concession arrangements and there is work to ensure harmonisation of Enduring Powers of Attorney, Guardianship and Advanced Care Directives across state boundaries.

Currently Queensland has developed a Carer Discount Card which builds on and extends Seniors Card entitlements; an arrangement that has been advocated in Victoria, Western Australia and in New South Wales. Decisions made about a Carers Card in Victoria need to be mindful of future national streamlining.

It is noted that the Commonwealth Minister for Families, Housing, Community Services and Indigenous Affairs 'will investigate the benefits of introducing a national carer card for recipients of Carer Payment and Carer Allowance<sup>1</sup> in order to validate the relationship between a primary carer and the person needing care with government agencies and services providers'. The card could be a vehicle to replace the Pensioner Concession Card to access concessions, and a means of allowing carers to access a range of discounts such as those offered to seniors.

## The proposed options for the Carer Reward Card

### Option 1: the Low Income model

We do not support this option as eligibility seems too restrictive. Carers receiving a Carer Payment (or presumably another income security payment such as Aged Pension, DSP or Parenting Payment) and in receipt of a Pensioner Concession Card would be eligible. Some Carer Allowance (child) recipients would be eligible if they receive a Health Care Card for the child (only some do). The vast majority of Carer Allowance (adult) recipients would not be eligible. They do not receive a concession or Health Care Card for themselves although the adult they care for is likely to receive a Pensioner Concession Card in his or her own name.

Eligibility for Foster Care, Permanent Care and Kinship Care Payments appear to be suitable.

In addition, while proposed eligible carers could receive additional benefits from discounts on government and community venues and services, Pensioner Concession Card holders and Health Care Card holders are already eligible for

most of the range of state concessions as well as the Commonwealth concessions.

The benefits of this model would be minimal and it would contribute little to further recognising carers. Many primary carers would indeed be aggrieved.

## Option 2 Carer Reward Card/ Companion Card Nexus

Eligibility for this option includes the Pensioner Concession Card holders and Health Care Card holders in Option 1, as well as carers who care for a person eligible for Companion Card.

The narrowness of eligibility for option 1 has been noted. Additional carer eligibility, based on the eligibility of the person for whom they care for Companion Card is also very restricted, as eligibility for companion card requires a profound disability and the need for ongoing attendant care to participate in the community (often but not always provided by the unpaid carer, depending on decision making capacity). To link the Carer Reward Card with the Companion Card in this way risks implying that the family carer always acts as the companion.

While it is apparent that ease of administration is of concern to DHS, many primary carers, particularly those in receipt of Carer Allowance will be ineligible and will not benefit because of the limited eligibility for Companion Card.

## Option 3 the broad based model- Expanded Seniors Card

Our preferred option is a modification of the broad based model.

Benefits provided through the Carer Card could be at two levels

- **Carer Card Holders** - Carers who are in receipt of Carer Payment (or another pension payment) and hold a Pension Concession Card or Health Care Card would continue to be eligible for state concessions, including transport concessions, together with the proposed additional benefits of
  - Discounts on government and community venues activities and services
  - Discounts from participating businesses (Extensions to Seniors Card)
- **Carer Discount Card Holders** - Carers who are Carer Allowance recipients or endorsed primary carers who are not eligible for state or commonwealth concessions but would receive
  - Discounts on government and community venues, activities and services
  - Concessions on public transport
  - Discounts from participating businesses.

**Eligibility** could be demonstrated by the following.

- Receipt of Carer Payment (or an equivalent pension payment and Carer Allowance) using evidence of Pensioner Concession Card or Health Care Card by the applicant and/ or
- Evidence of receipt of Carer Allowance or DHS Care Payments. The former may require Centrelink to issue a card or letter to recipients of Carer Allowance (adult or child) confirming their eligibility for Carer Allowance.
- Endorsement of eligibility as a primary carer by a treating medical practitioner or allied health professional.

The latter category of endorsed eligibility acknowledges that the current Child and Adult Disability Assessment Tools which are used to determine eligibility for Carer Allowance are very much based on an assessment of functional ability and are currently not sufficiently inclusive of carers of people with a mental illness, ADHD, challenging behaviour, a terminal or episodic illness, or carers whose relative is hospitalised.

Recent positive changes to Carer Payment (child) have resulted in the development of a new assessment tool or Disability Care Load Assessment which focuses on care load rather than the functional ability of the person needing care. It will improve access to Carer Payment (child) as a consequence of better recognition of short term and episodic care situations, terminal illness, caring for hospitalised children, multiple care responsibilities (involving the care of one or more children and adults) and shared or exchanged care situations. It is anticipated that at a future stage, these changes will flow onto Carer Payment (adult) and that new assessment tools emphasising care load, will replace the current Child Disability Assessment Tool and the Adult Disability Assessment Tool when these are used for access to Carer Allowance only. Thus, while in the future eligibility for a Carer Card could be governed by receipt of Carer Payment and / or Carer Allowance, interim arrangements to endorse some primary carer eligibility will be needed.

A simple application form, endorsed by a treating medical practitioner or allied health professional could be used to verify the applicants caring status. A simple definition of a primary carer would need to be developed in a way that was consistent with Centrelink definitions while also ensuring that carers who provide a similar level of care to those in receipt of payments are not excluded from the scheme.

## **Advantages**

There are advantages in building the Carers Card onto the existing infrastructures for Seniors Card.

- Seniors Card has well established benefits – including transport concessions, multipurpose taxi, and discounts from a wide range of participating businesses.

- A well established (20 year) business discount system provides an advantage over recruiting businesses to participate in a new system.
- Seniors Card has an experienced call centre/ administration.
- There would be a comparatively small expansion to eligibility (Around 130,000 primary carers added to existing 950,000 seniors card recipients.)
- A high degree of interstate consistency in the benefits of Seniors Card discounts is already in place.

Other advantages of our proposal include:

- Easy to administer in that it maximises the use of established eligibility for existing benefits such as Carer Payment and Carer Allowance, potentially reducing the need for further assessment for the majority of carers.
- It will effectively target many primary carers.
- It offers the potential for future national harmonisation.

### **Administration**

Consideration could be given to Carers Victoria administering the Carer Card, on behalf of and in cooperation with the Government, and with agreed protocols and procedures for eligibility and reporting. From our perspective this will be essential to:

- Avoid further confusion for carers in relation to the services system.
- Streamline the Carers Card with Carers Victoria as a key system entry point. Carers Victoria works to ensure that carers are readily linked to the specialist information and support services that they and the person they care for need, as well as the support, education, counseling and advocacy programs offered by Carers Victoria. We ensure that carers can access carer support groups and respite programs as necessary.
- Ensure that eligible carers are linked directly with the peak state wide body which represents their needs and issues.
- Minimise confusion between existing carer recognition mechanisms, particularly Carers Victoria's developing member benefits.

Carers Victoria would need to be appropriately resourced to administer the scheme.

### **Valued benefits and rewards**

- Access to the raft of state and commonwealth concessions for Pension Concession Card holders will continue to provide crucial financial support, as will concessional entry to government venues and discounts on various products.
- For Carer Allowance recipients, travel concessions, concessions to entry to government venues and discounts from the participating range of businesses provides real recognition and financial assistance.

## Contextual issues

- The numbers of potentially eligible carers needs better definition. While many carers receive Carer Payment (estimated as 30,000 Victorians<sup>ii</sup>) other carers receive income security payments such as Aged Pension, Parenting Payment and Disability Support pension as well as Carer Allowance. An estimated 100,000 Victorians<sup>ii</sup> are in receipt of Carer Allowance. A request to Centrelink to draw out data on the numbers of carers who receive an income security payment together with Carer Allowance and the number of Victorians receiving Carer Allowance only would assist forward planning. The data in the consultation paper concerning Carer Payment and Carer Allowance recipients appears incorrect.
- There is a need for clarity about definitional issues. Centrelink definitions of eligibility for Carer Payment and Carer Allowance (adult) appropriately do not require co residency. The care can be provided in the home of the carer or the person needing care.
- Naming the new provision as a Carer Card is likely to be more acceptable to unpaid carers than the notion of reward!

## End Notes

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<sup>i</sup> House of Representatives Standing Committee on Family, Community Housing and Youth (2009) *Who Carers..? Report on the inquiry into better support for carers* Recommendation 28.

<sup>ii</sup> Calculated by 25% of data on national recipients of Carer Payment and Carer Allowance in July 2007