

DERBYSHIRE COUNTY COUNCIL

CABINET

4 April 2017

Report of the Strategic Director for Adult Care

INDEPENDENT SECTOR CARE HOME FEES 2017-18

ADULT SOCIAL CARE

1. Purpose of the Report

To seek approval to:

- increase the rate paid to independent sector care homes for the financial year 2017-18 by 3.31% per week;
- make an additional payment of £4.27 per nursing care home placement per week
- make an inflationary payment of up to 3.31% for specialist care home placements where evidence is provided of inflationary pressures;
- set a rate of £36.56 per session for a day care placement in a care home;
- increase the dementia fee rate to £40.95 per week
- make an inflationary payment of up to 3% for well-performing block contracts in specific circumstances.

2. Information and Analysis

2.1 Background

The Council has contract arrangements in place with over 350 independent sector care homes that provide residential services to approximately 2841 people as detailed below:

- 1388 people in nursing placements where the person needs constant involvement of, or supervision of, a qualified nurse;
- 1456 residential placements.

2.2 Fee Levels

A comprehensive review of fee levels for independent sector care services is undertaken annually. To assist with this review representatives of the Derbyshire Care Providers Association (“the Association”) have been invited to set out particular business pressures affecting the care market and their costs. The Association continue to express its view that the detailed fee analysis and consultation previously undertaken by the Council was flawed and the fee rates do not cover their actual costs and require them to rely on “cross-subsidisation” by the providers themselves and residents/their families.

The Council’s fee proposals were shared with Provider representatives before a provider consultation meeting held on the 21 February 2017 with Councillor Paul Smith and Strategic Director Joy Hollister. Providers present at this meeting took the opportunity to feedback on the proposals and to discuss more widely the constraints currently being observed in the health and social care market.

A number of providers, including representatives of the Association, have also written to the Council identifying their cost pressures including the continued impact of the National Living Wage, the proposed increase in costs of regulating care services by the Care Quality Commission and increased costs of Insurance.

For a detailed explanation of the providers’ concerns, Cabinet Members should read recent correspondence between the Association and the Council. This can be found at Appendices 4-7. The Council will further respond to the Association following the decision by Cabinet in respect of 2017-18 fee rates.

3. Financial Considerations

The providers have highlighted a number of additional cost pressures including;

Wage and pension pressures

Providers have identified that the National Living Wage is due to increase by 4.2% for staff aged 25 and over from 1 April 2017 (from £7.20 per hour to £7.50 per hour). The auto pension enrolment was another area that providers felt the Council should build in to the fee rate increase. As part of these changes providers will need to make a pension payment of 1% for all eligible staff. The implementation date for this is different for each provider.

Council response:

For the introduction of the National Living Wage the Council has decided to use the 4.2% minimum wage increase for all staff costs including staff aged under 25 and management and administrative staff.

The auto-enrolment pension scheme has been subject to a national introduction over the past few years. It has been nationally accepted that the costs to a provider from 1 April 2017 should be in the region of an additional 1% on their staffing bill. It is proposed as part of developing a fee settlement for 2017-18 that overall staff costs should be increased by 1% to enable providers to meet this requirement.

Care Quality Commission fees

The Care Quality Commission (CQC) has recently concluded consulting with providers on proposed increases in the level of fees charged to providers for 2017-18. The outcome of this consultation has not been publically shared at the point of writing this paper.

The CQC are continuing with a fee policy that moves them to a full chargeable cost recovery position, so that providers ultimately bear all the chargeable costs, reducing CQC reliance on Grant Aid from Central Government. The current proposal by CQC to increase Care Home registration fees for 2017-18 is 3.7%.

Council response

The Council is confident that 3.7% is the likely level that the CQC will increase their charge by and this percentage increase has been used in modelling the Council fee rates for 2017-18.

Insurance

The Association have previously stated that the unit value for insurance is lower than they would calculate for a care home with 40 beds. No evidence has been provided by the Association to support this feedback.

Council response

The Council acknowledges that there has been increased financial pressure on insurance costs. When determining an increase in insurance costs the Council has used the closest comparable inflationary cost of 6.60% as identified in the Office of National Statistics' Consumer Price Inflation report for November 2016.

Quality Premium

The Association noted that “The Quality Premium has not been consistently been increased in line with standard fees, despite additional costs in staff wages “for doing net payments and training”.

Council response

The Quality Premium fee was introduced a number of years ago to promote improvements in the care home sector. It was previously agreed by Cabinet that the current Quality Premium Payment of £21 per person per week is maintained and that a new set of criteria would be considered to promote quality standards. Unfortunately, this commitment to review the payment and application process has had to be paused whilst the financial implications of the introduction of the National Living Wage for staff aged 25 and above from April this year and the subsequent year on year increases up to £9.00 in 2020 is better understood.

The continued payment of the Quality Premium shows the Council’s commitment to promote improved ways of working in the sector. However any review of its continued use will need to take account of the known future inflationary commitments to meet National Living Wage in conjunction with the need for the Council to make substantial budget cuts. Any review of the Quality Premium scheme will be undertaken with the involvement of providers willing to participate.

It is recommended to use the combined inflationary increase of 3.31% identified for Care Home placements to increase the Quality Premium Payment by £0.70 to give a new rate of £21.70 for 2017-18.

Dementia Friendly Provision

The Association previously expressed concern that the application process to gain approval to meet the Council’s Dementia Standards was too onerous and requested that it was simplified.

Council response

Cabinet agreed on 5 May 2015 that an additional payment would be made to providers supporting people with a diagnosis of dementia. This payment would only be payable to homes that meet set criteria of dementia-friendly provision. This process was introduced to encourage homes to demonstrate that they have the skills, experience, environment and organisational culture in place to provide high quality dementia care. The Council introduced this criterion as many providers describe their service as being able to meet the needs of people with dementia but are unable to evidence that staff have

adequate training, that the culture of the service is dementia friendly or that the environment has been adapted to be suitable for someone with a diagnosis of dementia.

The process used to determine which homes can provide dementia specific provision had been developed with care home representatives. Following feedback from these same providers and other successful applicants the paperwork application has been rationalised and remains subject to review to ensure effectiveness. Seven providers have successfully achieved this status and others are currently being assessed for their suitability. The importance of this award will continue to be promoted with care home providers to increase the take up.

It is proposed that the dementia fee rate is inflated in line with the general inflationary increase of 3.31% identified in Appendix 1 this would give a new weekly cost of £40.95.

Nursing provision

The Association has requested that the Council respond in the fee setting exercise to respond to concerns in respect of sustainability of Care Homes with Nursing. The Association has highlighted that three nursing Care Homes have closed in Derbyshire during 2016-17 citing particular concerns about recruitment and retention of Nursing Care staff.

The Association has asked the Council to refer to a review undertaken by Mazars LLP (accountancy specialists) on behalf of the Department of Health in 2015-16 into the rate of NHS Funded Nursing Care. When making a placement into a nursing home the nursing care element of the placement including the cost of nurses is funded by the NHS. The funding covers the tasks identified by a nursing needs assessment as those that need to be carried out or supervised by a qualified nurse. The outcome of this work by Mazars resulted in the NHS contribution towards the direct nursing costs of a place in a care home with nursing increasing by 40% to £156.25 per week.

The Association have requested that the Council consider the overall findings of the Mazars analysis of the costs of nursing care. Mazars suggested that all the activities (including direct, indirect nursing care and non-nursing care) undertaken by a registered nurse costs £195.12 per week. The NHS decided that they are only responsible for the direct nursing costs and the other costs attributed to nursing activity should be the responsibility of the Local Authority. The difference between the fee rate of £156.25 paid by the NHS and the £195.12 inclusive of indirect nursing costs is £38.87 which the Association expects the Council to contribute towards.

Council response

The Council shares the concerns expressed by The Association about the provision of Care Homes with Nursing. There is a national shortage of nursing staff which is impacting on the ability of the NHS and Care Homes to recruit and retain quality nursing staff at an affordable level. The difficulties with recruitment of nursing staff result in Care Homes having to use high cost agency nursing staff. The regular use of agency nursing staff impacts on the Care Home being able to provide continuity of care and will ultimately cost more than budgeted for.

The fee contribution made by the Council towards placements in a Care Home with Nursing includes a payment of £13.02 on top of the standard Home Care fee paid by the Council to reflect the complexity of the service. The Council proposed at the meeting held with Providers on 21 February 2017 to inflate the Nursing Care fee differential by 3.31% to reflect concerns about fluctuations in occupancy as the Council has a responsibility as part of the Care Act 2014 to ensure that there is suitable market coverage.

Following this meeting the Chair of the Association provided further supporting evidence to request a review of the proposed increase of the Nursing Care Fee differential. Their request focused on the need to support homes with recruitment and retention costs for Nurses. As noted above the national shortage of nurses has impacted on the ability of Nursing Care Homes to recruit nurses. The Association have evidenced that to assist them to maintain service provision they would need a minimum of £4.27 per client per week. Ensuring homes have a settled group of nursing staff is likely to contribute towards improved levels of care and will help to maintain availability of Nursing Care home beds at a time that the Health and Social Care system needs to be able to support Early Discharge from Hospital. It is therefore proposed that the Nursing Fees are increased by an additional £4.27 as requested to help with sustaining the Nursing Care Home Market. This would give a new Nursing Fee Differential of £17.71 per person per week an overall increase of £4.69.

3.1 Fee Rate Methodology

The method for identifying the proposed fee rates builds on the work previously undertaken to identify a basic care home fee rate as detailed in the paper presented to Cabinet on the 9 September 2014. As part of this work the Council asked care home providers to complete a questionnaire to evidence their costs. The Council then used standard cost headings to analyse the returns before identifying values against each cost head - see Appendix 1.

To develop fee rate proposals for 2017-18, these previously identified cost headings have been inflated based on a set of assumptions about inflation

pressures – see Appendix 2. These proposals have taken account of the feedback received from Care Home providers. Based on this analysis it is proposed to increase fee rates by £15.51 per week equivalent to a 3.31% increase on the basic care home fee rate for 2016-17.

This methodology has been consistently challenged by the Association and a request has been made in correspondence for the Council to commission an independent review of the actual costs of care. The Council is satisfied that its' analysis and methodology is correct and so such a review is not necessary.

3.2 Impact of the Proposals on Care Home Fees for other Client Groups

The proposals made in this report, and summarised in Appendix 1, focus on the basic fee rates for older people. It is proposed to also increase the base fee rates by 3.31 % for other client group placements. This includes care home provision for people with a physical disability, people with learning disabilities and people with mental ill health – see Appendix 3.

The changes proposed to the basic fee rates for other client groups will not change the level of funding already paid against specialist care home placements where fee rates have been individually negotiated to ensure that the needs of people who require complex support/care arrangements are met. The fees for specialist placements are often substantially more than the standard care home fees - see Appendix 3.

The additional funding (top-up) paid for a specialist placement reflects the greater investment in staff and training to meet an individual's needs. It is proposed that top up payments of up to 3.31% can be agreed with providers in receipt of specialist placements where they can evidence their increase in costs.

3.3 Day Care Placements in Care Homes for Older People

Some people who are supported to live in their own homes are able to use day care places in care homes for older people. The care home is often close to where an individual lives and they frequently help with transport to and from the home and provide meals. In some cases homes will also provide a bathing service and are very flexible with places being made available at weekends and evenings, which can help carers.

The standard fee rate paid by the Council for day care placements in independent sector care homes is currently £35.38 per day. It is proposed for 2017-18 that this fee level to be paid to providers is increased by 3.31% to provide a new daily fee of £36.56 per day.

4. Block Contracts

Adult Care has a small number of block contracts with independent sector profit and not for profit organisations. A number of these agreements were established before the proposed introduction of the National Living Wage e.g. the Laundry Contract for Care Homes. A small number of providers have requested an inflationary increase to assist them with meeting this additional unforeseen cost. It is proposed that payments of up to 3% can be agreed with providers who operate block contracts on behalf of the Council where they can provide detailed evidence of their increase in costs as well as showing that they are meeting their agreed targets for activity and performance.

5. Financial Considerations

The estimated cost of this proposal to increase fee rates from 1 April 2017 is 3.862m. The costs will be met from existing budgets and an allocation from the Council's Contingency Budget.

6. Social Value Considerations

The regulated Care Home services provided by the organisations detailed in this paper all contribute towards promoting social value for people in Derbyshire. All of these services play a key role in their local communities providing connections between families and friends and offering local employment.

7. Legal Considerations

The Council is under a legal duty, arising both from case law and Department of Health Guidance, "Building Capacity and Partnership in Care" (2001), to ensure that fee setting reflects the actual costs of care. The rates should also take into account the legitimate current and future costs, and the potential for improved performance and most cost effective ways of working.

In accordance with the Care Act 2014, the Council is under a new duty to promote diversity and quality in the market of care and support provision. The Association has put forward an argument that the Council, in failing to increase the fee rates more, is in breach of this statutory duty. The Council is satisfied that the methodology used in calculating the proposed fee increase is equitable and properly reflects the increased cost pressures highlighted by the providers.

7. Equality and diversity Considerations

Providers are required to adhere to Derbyshire County Council's Equal Opportunities policies. The Council also encourages Providers to gain the Derbyshire Respect and Dignity award.

8. Other Considerations

In preparing this report the relevance of the following factors has been considered: human resources, health, environmental, transport, and crime and disorder considerations.

9. Key Decision

Yes

10. Is it necessary to waive the call-in period?

No

11. Officer's Recommendation

That Cabinet agrees to:

- increase the rate paid to independent sector care homes for the financial year 2017-18 by 3.31% per week as summarised in Appendix 3;
- make an additional payment of £4.27 per nursing care home placement per week
- make an inflationary payment of up to 3.31% for specialist care home placements where evidence is provided of inflationary pressures;
- an updated fee rate of £36.56 per session for a day care placement in a care home;
- an updated dementia fee rate of £40.95 per week
- make an inflationary payment of up to 3% for well-performing block contracts in specific circumstances.

Joy Hollister
Strategic Director – Adult Care
County Hall
Matlock

Appendix 1 Summary of Costs**CARE HOME PROPOSALS**

PERSONAL CARE ONLY FOR FRAIL OLDER PEOPLE	Calculation used for Oct 2016	2017/18 Inflation	2017/18 New Rate
A) STAFF, INCLUDING EMPLOYERS' ON-COSTS			
TOTAL NURSING STAFF			
TOTAL CARE ASSISTANTS (inc senior) STAFF	195.23	4.20%	203.43
Catering, cleaning and laundry staff cost per resident	44.00	4.20%	45.85
Other Staff Costs (excluding management and admin)	4.23	4.20%	4.41
Management, administration, reception staff cost per resident	60.81	4.20%	63.36
Pension Cost	3.14	4.20%	3.27
TOTAL STAFF	307.41		320.32
B) REPAIRS AND MAINTENANCE			
Maintenance capital expenditure	16.15	2.00%	16.47
Repairs and maintenance (revenue costs)	9.71	0.70%	9.78
Contract maintenance of equipment	1.85	2.00%	1.89
TOTAL REPAIRS AND MAINTENANCE	27.71		28.14
C) OTHER NON-STAFF CURRENT COSTS AT HOME LEVEL			
Food	21.79	1.00%	22.01
Utilities (gas, oil, electricity, water, telephone)	19.69	1.00%	19.89
Handyman and gardening (on contract)	8.75	2.00%	8.93
Insurance	2.18	6.60%	2.32
Total medical supplies and continence products	2.48	1.50%	2.52
Trade and clinical waste	1.66	1.10%	1.68
Registration fees (including DBS checks)	3.17	3.70%	3.29
Recruitment	0.71	2.00%	0.72
Direct training expenses (fees, facilities, travel and materials) net of grants and subsidies	2.99	2.00%	3.05
Other non-staff current expenses	20.04	1.10%	20.26
Equipment Costs	3.51	1.00%	3.55
TOTAL NON-STAFF CURRENT EXPENSES	86.97		88.22
TOTAL EXCLUDING CAPITAL	422.09		436.68
Return on capital	46.00	2.00%	46.92
Summary Weekly Fee	468.09		483.60
Divisible by 7			£483.63
Percentage Increase	3.31%		

Appendix 2

Inflation Assumptions used by Derbyshire County Council to Identify Fee Rates for 2016-17

In considering the budget lines in the fee cost model in Appendix 1 the Council took account of the Office of National Statistics' Consumer Price Inflation report for November 2016 as a proxy for understanding the costs in care industry.

Some of the budget lines used in appendix 1 do not have a direct corresponding goods or services division in the CPI report in such cases individual judgements have been made about how inflation may contribute to the costs of running a care home.

Staffing

From April 2017 Providers will be required to pay all staff over 25 at national living wage which is equivalent to a 4.2% increase on the national living wage rate set in October 2016.

The Council has decided to use the 4.2% minimum wage increase for all staff costs including staff aged under 25 and management and administrative staff.

Auto-enrolment pension scheme has been subject to a national introduction over the past few years, where providers have to offer to sign all staff into a pension scheme. From 1 April 2017 it has been nationally accepted that the costs to a provider should be in the region of an additional 1% on their staffing bill.

Repairs and Maintenance

There are no direct comparisons with CPI available for these areas of cost the nearest alternatives show inflationary costs between 0.7% for services and maintenance and 2% maintenance and repairs. These two inflationary levels have been used in the Council's calculation.

Other Non-Staff Costs

Food is shown across most food types as negative inflation however for purposes of this analysis we have treated this as 1% inflation noting the potential impact of Brexit on costs.

For utilities the Council notes that there is great variance between the individual categories including power, which is likely to make up the most of this category. Electricity and gas have dropped by 1.6% and 0.2%

respectively. Telephony has shown an increase in costs of 2.7% and water is 1.4% higher. Since the greatest cost is on gas and electricity it is decided that this should be treated as an overall 1% increase.

There is no direct comparison for Insurance Costs in the CPI tables; the closest comparable cost is an increase of 6.6%.

Medical supplies and continence products are currently showing at 1.5%.

Registration Fees:

The CQC are continuing with a fee policy that moves them to a full chargeable cost recovery position, so that providers ultimately bear all the chargeable costs, reducing CQC reliance on Grant Aid from Central Government. The current proposal by CQC to increase Care Home registration fees for 2017-18 is 3.7%.

CPI shows an inflationary pressure of 1.3% for **Equipment Costs** and other miscellaneous goods.

The Council has decided to use a general increase of 2% for other cost items to reflect the potential impact of wage increases impacting on other service areas.

Fee Rate

The proposed fee rate as highlighted in Appendix 1 of 483.60 has been increased slightly to £483.63 so that it can be divisible by 7 to provide a daily allowance.

The increase is equivalent to £15.54 per placement per week or 3.31%. This value will be used to increase all of the current fee rates as per the schedule in Appendix 3.

Appendix 3

NURSING PLACEMENT	Weekly Standard Rate	Quality Premium per week - £21.70
Older People	501.34	523.04
Physical Disability (>65)	552.93	574.63
Learning Disability	498.68	520.38
Mental Health/Drug & Alcohol	509.60	531.30
These Nursing fees do not include funded nursing care contribution which at the time of writing is £156p/w		
RESIDENTIAL PLACEMENT	Weekly Standard Rate	Quality Premium per week £21.70
Older People/Mental Health/Drug & Alcohol	483.63	505.33
Physical Disability (>65)	560.00	581.70
Learning Disability	505.75	527.45
DEMENTIA CARE PAYMENT		
Residential & Nursing	40.95 per week	
DAY CARE		
Residential & Nursing	36.56 per day	

Appendix 4



Derbyshire Care Providers Association (formerly known as Derbyshire Care Homes Association)

Mrs Joy Hollister
Strategic Director – Adult Care
Derbyshire County Council
County Hall
Matlock
DE4 3AG

Date: 06/02/2017

Dear Mrs Hollister,

Re: Care Home Fees 2017/18

We wrote to you on the 5 December 2016 asking for an urgent response to stabilise the Council funded care home sector in Derbyshire which is in a worse state than ever. We are very concerned that we have not had a response as of yet, which means we have not been able to reassure the sector in any way.

Recently the CQC added to the overwhelming evidence of insufficient fees by the Council by stating that the sector is at a 'tipping point'. Leung & Buisson recently also confirmed this in their study on care home costs and so did the Local Government Association, which reported that the Council is paying well below the floor price of £554 (DCC pay £488-£489).

As I am sure you are aware from all previous evidence that we have supplied, and the cost of the Council's own provision, that costs continue to increase at a rapid pace. Coupled with already insufficient fees from the Council the sector for Council funded clients is at major risk and is simply not sustainable.

This year we have identified further significant increases, for example:

- National Living Wage is increasing by 4.2%. This affects most staff as staff on other wages, such as senior care staff, will need the same increase to retain the differentials.
- Funding for apprenticeships (NVQ qualifications) is passed on to employer with a 0.5% levy of total payroll cost plus additional costs from training providers when this has been spent.
- CQC registration fees increase by 3.9%

It is simply not good enough to add these increases onto the existing insufficient and inaccurate costing model produced by the Council. We have on numerous occasions provided evidence of the inaccuracies in the model.

In addition to the above examples, there are costs that the Council have failed to take into account in previous years, such as the introduction of the Care Certificate (see last year's



Derbyshire Care Providers Association (formerly known as Derbyshire Care Homes Association) calculations), increased staffing levels due to higher dependencies, increases agency usage for both carers and nurses, substantial increases in management salaries as fewer managers want to take on an increasingly difficult job, increased senior management team to cope with the increased regulatory pressure, higher insurance premiums as insurers such as Allianz pull out of the market, and so forth.

The Council has an obligation under the Care Act to ensure sustainable provision now and in the future and it is therefore urgent that it starts to recognise the real cost of care home service provision in Derbyshire by commissioning an independent review of costs.

We look forward to hearing from you and working in partnership to agree on an urgent sustainable solution for the care home sector.

Yours sincerely,

Pierre Falleth

Chairman

On behalf of the committee of the Derbyshire Care Providers Association

Appendix 5



Pierre Falleth
Chairman
Derbyshire Care Providers Association
Milford House
Springwood Gardens
Belper
Derbyshire
DE56 1RT

Colin Selbie
Contracting & Compliance
Derbyshire County Council
County Hall
MATLOCK
DE4 3AG

Telephone: 01629 532131
Fax: 01629 538368
Ask for: Colin Selbie
Email: colin.selbie@derbyshire.gov.uk
Our Ref:
Date: 10th February 2017

Dear Mr Falleth

Re: Proposed Care Home Fee Rates 2017 – 2018

I am writing in advance of our proposed meeting to be held at 3.30pm on the 21st February 2017 to consider the Derbyshire Care Home market and fees.

I am able to confirm that the Council has decided to continue with the previously used method for calculating the Care Home fee rates for 2017-18. The Council is satisfied that its' analysis and methodology is correct and so an independent review as requested by the Association is not necessary.

The method for identifying the proposed fee rates builds on the cost headings used to identify the 2016 -2017 fee levels which have been increased based on a set of assumptions about inflationary pressures that have been highlighted by the Association and by other Derbyshire Care Home owners.

The outcome of this work is that the Council is proposing to increase fee rates by £15.54 per week from 1st April 2017 which is equivalent to a 3.31% increase. This proposed increase is made in light of the continued Council budget pressures. Appendix 2 attached shows how this increase will be translated into weekly costs for each client group.

It has also been proposed to;

- use the combined inflationary increase of 3.31% identified for Care Home placements to increase the Quality Premium Payment by £0.70 to give a new rate of £21.70 for 2017-18.
- Increase the dementia fee rate by 3.31% to give a new weekly cost of £40.95.

PUBLIC

- Increase the fee contribution made by the Council towards placements in a Care Home with Nursing by 3.31% to give a new weekly contribution of £13.44

We will of course be happy to discuss these proposals with you when we meet and receive any further comments from you on behalf of the Derbyshire Care Providers Association on the proposals summarised in this correspondence.

Yours sincerely

Colin Selbie
Group Manager

Appendix 6

Email from Pierre Falleth (pierre.falleth@milfordcare.co.uk)

Dear Colin,

Further to our meeting yesterday afternoon with Council Smith and Mrs Hollister I attach the details on the issue of a lower margin for nursing homes in your model. This is a significant issue that directly impacts on the sustainability of nursing homes in Derbyshire, which the Local Authority is of course responsible for under the Care Act.

Mandy also mentioned the impact on the Apprenticeship Levy of 0.5% on payroll costs. This has a significant impact on our costs and is not accounted for in your model.

There are lots of cost items that have risen faster than inflation as discussed yesterday. Staffing levels being the most significant. However there are also other items that we didn't discuss. For example, recruitment costs, particularly in Nursing Homes. The lack of nurses, and the turnover of nurses, is as you know worse than ever before. Most homes are having to recruit nurses through recruitment agencies at a cost of 10-15% of annual salaries – on average ca £4000 per nurse. On average homes are recruiting 2 nurses per annum at a cost of £8000. This equates to £4.27 per resident per week (90% occupancy in a 40 bed home). The Council has only allowed £0.72 per resident. (note this is not a cost item that is the responsibility of the CCG under the FNC)

Again, we ask you to consider these issues when setting the fee as per Local Authority's responsibility under the Care Act.

Kind regards

Pierre Falleth

On behalf of the DCPA committee