

Guidelines on Management of Allocation of Places under Agency Quota in Residential Care Homes for the Elderly

Background

A number of subvented residential care homes for the elderly (RCHEs) operated by non-governmental organisations (NGOs) are currently operating subsidised places under “agency quota” to which elders are admitted at the discretion of the NGOs concerned. The Independent Commission Against Corruption (ICAC) conducted a study in 2004-05 to examine the procedures and practices of NGOs relating to the allocation of RCHE places under agency quota, with a view to ensuring that a fair and objective mechanism on the allocation of these places is in place. The study covers the admission criteria, the processing of applications, the maintenance of waiting lists and the allocation of vacant places. It also examines the procedures of the Social Welfare Department (SWD) for monitoring NGOs’ compliance with the SWD’s requirements on the admission of places under agency quota. The ICAC observes that while RCHEs have put in place some procedures and control measures, there is still room for improvement to ensure that sufficient safeguards against abuse are in place.

2. To ensure fairness and transparency of the procedures for the allocation of places under agency quota, the ICAC made a number of recommendations on some specific areas. This set of guidelines incorporates the ICAC recommendations and sets out the principles and procedures on the management of allocation of places under agency quota in RCHEs.

Operational Manual for Allocation of Agency Quota in RCHEs

3. NGOs that offer places under agency quota in RCHEs are required to draw up an operational manual for the allocation of these places. The manual should include the following areas which are elaborated in the ensuing paragraphs -

- (A) Application procedures and admission criteria;
- (B) Criteria for priority admission;
- (C) Standardised care need assessment for admission;
- (D) Waitlisting mechanism;
- (E) Withdrawal records;
- (F) Ethical requirements;
- (G) Information for management; and
- (H) Monitoring mechanism.

(A) Application Procedures and Admission Criteria

4. While the application procedures for admission to the residential care places to be filled by applicants from the Central Waiting List (CWL) administered by SWD are laid down in the Manual of Procedures on Registration and Allocation of Long Term Care Services issued by SWD, it is recommended that NGOs lay down clearly the application procedures and criteria for admission to RCHE places under their agency quota. Each NGO may set the admission criteria with reference to its mission, vision, values and service strategies. While some NGOs may open up their agency quota places to elders of the public, some may lay down specific criteria as set out in the following examples –

- (a) cases referred by directors or donors;
- (b) family members or relatives of staff;
- (c) members of service units of the agency; and
- (d) elders with the same religion of the agency, etc.

5. NGOs should also spell out the requirements on age, gender and religious background (if any) of applicants for admission to the RCHE places under agency quota with a view to facilitating potential service users to make informed choices in making applications. Eligibility criteria listed in the Funding and Service Agreement for the

RCHE concerned may serve as a reference. Applicants should also be informed of the arrangements necessary for the making of an application, say whether a referring caseworker is required, whether self-approach is acceptable, etc.

6. The application procedures and admission criteria should be made known to potential service users and all other relevant parties through various means like service pamphlet, notice, website, etc.

(B) Criteria for Priority Admission

7. Priority placement is a measure to meet the urgent need of applicants for residential care services. Some NGOs may, for various reasons, accord priority to needy elders for admission to places under agency quota. To ensure fairness and increase transparency, NGOs are advised to draw up clear procedures and workflow for processing applications for priority admission to enable consistency in processing these applications by the staff concerned and the approving authority.

8. In drawing up the criteria for priority admission, NGOs may consider factors and situations under which priority placement will be justified. The workflow for priority admission should also include the level of recommending personnel and the level of staff or the board responsible for endorsing the applications for priority placement. NGOs may make reference to the relevant chapter of the Manual of Procedures on Registration and Allocation of Long Term Care Services issued by SWD.

(C) Standardised Care Need Assessment for Admission

9. As RCHE places under agency quota are subsidised places, it is recommended that NGOs adopt the objective and comprehensive Standardised Care Need Assessment, i.e. the MDS-HC assessment, in processing applications for admission to agency quota places with a view to ensuring that Government resources are deployed to serve the targeted users. This applies in particular to the care and attention places under

agency quota, having regard to the fact that self-care hostel and home for the aged places are to be phased out for conversion into care and attention places to provide a continuum of care and that agency quota places in nursing homes are to be phased out through natural wastage.

10. Same as the practice with the allocation of subsidised residential care places for applicants from the CWL, admission to residential care services under agency quota should follow the outcome of the Standardised Care Need Assessment. Only elders confirmed to have the impairment level suitable for admission to the RCHE concerned should be admitted to the places under agency quota. Under normal circumstances, elders with a lower impairment level should not occupy subsidised places under agency quota. This requirement should form part of the admission criteria made known to the public so that applicants are well informed of the requirement to undergo MDS-HC assessment to establish the care need for the services. NGOs should make reference to SWD's Guide for the arrangement of standardised care need assessment for admission to the agency quota places.

(D) Waitlisting Mechanism

11. NGOs are advised to set up a waitlisting mechanism to manage the applications and to set out the principles and procedures in processing these applications, especially when the demand for residential care places under agency quota is great. There should be a proper record system keeping in good order an accurate and updated list of applicants waiting for admission to agency quota places. In situations where an elder indicates preference of more than one RCHE under the same NGO, the applicants should be clearly informed of the options, the procedures to change their preference and the consequence of declining offer(s).

12. To increase the transparency of the waiting list for agency quota places so that applicants and potential applicants may estimate the position of their applications, NGOs are advised to make public the latest turn of placement offered from the waiting list on a regular basis through, for example, notice board or NGO website.

(E) Withdrawal Records

13. Sometimes an applicant may decline an offer when his/her turn is due or withdraw the application when he/she is still on the waiting list. To prevent manipulation of the waiting list by advancing any applicant whose turn is not yet due or who has a comparatively later application date, NGOs are advised to maintain proper records of all withdrawal cases, including cases being called for admission and those on the waiting list.

14. It is recommended that applicants withdrawing their applications or their representatives should be required to submit a written confirmation or to sign a relevant withdrawal form for record purpose. This practice helps minimise future disputes on withdrawal of applications. Withdrawal records should be subject to regular supervisory check.

(F) Ethical Requirements

15. NGOs are advised to lay down ethical standards and develop a practice to remind their staff to avoid conflict of interest specifically in the administration of agency quota cases.

16. To raise staff's awareness, NGOs are encouraged to provide staff with relevant work-related examples of conflict of interest. Some proposed illustrations are as follows –

- (a) an applicant of normal admission or priority admission to the service being a family member, relative or friend of the NGO staff who is either administering, processing or assessing the application;
- (b) an applicant's family member offering gifts to the NGO staff responsible for processing the application whilst requesting the latter to exercise discretion in speeding up allocation of a

place for the applicant;

- (c) an applicant's family member offering service discount from his self-owned company to the NGO staff responsible for processing the application when requesting priority placement for the applicant; and
- (d) a member of the priority placement approving board being a family member, relative or friend of the applicant of priority placement or his/her family members, etc.

17. NGOs should provide guidelines and procedures for staff and relevant personnel taking part in the administration of agency quota places to avoid as far as possible falling into situations leading to a conflict of interest; and if necessary to declare conflict of interest in the first instance so that proper arrangements can be made to protect them from possible ethical accusations.

(G) Information for Management

18. To enhance internal monitoring of the management of allocation of agency quota places, RCHEs concerned are advised to provide regular reports on the subject for information of their agencies' boards or management committees concerned.

19. The regular reports should incorporate essential information such as the number of applications received, details of the cases admitted under normal or priority admission and of rejected cases, the waitlisting situation, etc. The NGO's board or management committee should indicate that they have examined the reports, and give their comments, if any, for follow-up actions and record purpose.

(H) Monitoring Mechanism

20. To ensure that NGOs are implementing the policies, procedures and practices as set out in their operational manual for

allocation of agency quota places, NGOs should conduct annual self-assessment on their compliance with the laid down instructions and procedures, preferably by an independent team/officer, which should be copied to SWD for monitoring purpose.

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