Cabinet – 13 January 2010

Usual Cost, Preferred Accommodation and Top Up Policy for Care Home Placements

Portfolio: Councillor McCracken, Social Care, Health and Housing

Service: Social Care and Inclusion (Adult Services)

Wards: All Wards

Key decision: Yes

Forward plan: Yes

1. Summary of report

This report outlines proposals for the approval of the Usual Cost, Preferred Accommodation and Top Up Policy as part of the re-tender of the council's residential and nursing care services as a core element of the overall modernisation and redesign of services for older people and people with disabilities. The policy is based upon the legal position summarised within Section 4-7 of the attached policy document and will apply to all contracts for residential and nursing care once the intended transfer of the existing individual service contracts take place on 1 April 2010.

There are sometimes circumstances where an individual who is selecting a care home wishes to choose one which is more expensive than the Council will normally pay, because they prefer a higher quality of accommodation or of service than usual. The guidance sets out the level of funding that individuals can expect from the council, subject to the individual's means, and gives them the right to enter into more expensive accommodation in certain circumstances on the basis that an extra amount is paid. This is a matter of choice for the individual. Only when an individual has expressed a preference for more expensive accommodation than the Council would usually expect to pay, will there be a 'top up' payment. This payment is normally paid by a third party e.g. a family member.

2. Recommendations

That the Usual Cost, Preferred Accommodation and Top Up Policybe approved.

3. Background information

- 3.1 This policy is derived from the re-tendering of Residential and Nursing Care Services. The council has never had a formal policy on this matter and it is anticipated that this policy will clarify the positions of each party involved and strengthen the council's ability to take the appropriate action, when required, on many of the frequently occurring issues being experienced within social care and Inclusion, in particular the circumstances under which "Top Ups" are or are not permitted.
- 3.2 This policy has been considered and agreed upon by the Residential and Nursing Care Services Tender Project Team which includes the Assistant Director for Social Care, heads of service for older people, disabilities, mental health (for both the council and NHS Walsall), finance (for both the council and NHS Walsall) and legal services.

4. Resource considerations

4.1 **Financial**: There are no financial implications arising directly from the policy. However, the policy indicates the usual cost for each type of placement and the policy regarding top ups ensures that clear direction is given on the maximum amount the council will pay for clients in receipt of care.

The total residential and nursing care budgets for the directorate for 2009/10 is c£33m

- 4.2 **Legal**: There are no legal implications arising directly from the policy. The council's position is strengthened in relation to the law and statutory guidance.
- 4.3 **Staffing**: There are no staffing implications for council employees.

5. Citizen impact

This policy should improve the quality and choice of residential homes for citizens of Walsall as well as provide greater clarity on obligations and responsibilities.

6. Community safety

There are no community safety implications.

7. Environmental impact

There are no environmental issues.

8. Performance and risk management issues

This policy will work in accordance with the residential and nursing care services tender which has a comprehensive and detailed strategy on performance management as well as a risk register.

9. Equality implications

The policy's equality implications are aligned with the Local Authority Circular LAC(2004)20 Guidance on: National Assistance Act 1948 (Choice Accommodation) Directions 1992 National Assistance (Residential and Accommodation) (Additional Payments Assessment of and Resources) (Amendment) (England) Regulations 2001 will not exclude any citizen who has an assessed need for the service and meets the Fair Access to Care criteria.

10. Consultation

The policy has been consulted upon by Walsall Council, NHS Walsall and providers of residential care services.

Background papers

N/A

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Dated: 15 December 2009

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Dated: 16 December 2009

Usual Cost, Preferred Accommodation and Top Up Policy

Author: Andrew Flood

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1.0 Introduction

1.1 Walsall Council policy in relation to Usual Costs," and "Preferred Accommodation" and "Top ups" is based upon the legal position summarised within Section 4 – 7 of this policy document and will apply to all contracts for residential and nursing care once the intended transfer of the existing individual service contracts take place on the 1 April 2010.

2.0 Guidance and Regulations

- 2.1 The Council's position is determined by the Local Authority Circular LAC(2004)20 Guidance on: National Assistance Act 1948 (Choice of Accommodation) Directions 1992 and National Assistance (Residential Accommodation) (Additional Payments and Assessment of Resources) (Amendment) (England) Regulations 2001.
- 2.2 The guidance replaces the previous guidance which accompanied the Directions and are intended to ensure that when Councils with social services responsibilities make placements in care homes or care homes providing nursing care, that, within reason, individuals are able to exercise genuine choice over where they live.
- 2.3 The Regulations give individuals the right to enter into more expensive accommodation than they would otherwise have been offered in certain circumstances. The guidance sets out what individuals should be able to expect from the council that is responsible for funding their care, subject to the individual's means, when arranging a care home place for them.
- 2.4 The guidance describes the minimum of choice that councils should offer individuals and states that councils should make all reasonable efforts to maximise choice as far as possible within available resources even when not required to act in a certain way by the Directions or the Regulations.
- 2.5 Whilst the detail of the guidance applies to registered care homes, the principles apply to adults placed in unregistered settings also.

3.0 Summary of Key Policy Points

- 3.1 A number of the key points in relation to Service Users choice, preferred accommodation, usual cost and Top ups are summarised as follows;
- 3.1.1 Individuals will not be refused their preferred accommodation without a full explanation being provided in writing including the reasons for doing so.
- 3.1.2 The council's usual costs of providing residential accommodation to specific client groups are as set out in Appendix A Table 1. The usual cost includes a contribution from the Service User which is means tested and based on a benefits assessment.
- 3.1.3 Instead of paying a contribution to the Council, the Resident / Service User is to pay the same amount direct to the Provider. The Council will pay the difference between the usual cost and Service User's contribution. However, it should be noted that even where there is such an agreement for the resident to make payments direct to the accommodation Provider, the council continues to be liable to pay the full costs of the accommodation should either the resident or relative fail to pay the required amount.

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- 3.1.4 Walsall Councils own usual costs will apply when making placements in another council's area unless the other Council's usual price is less and a contract is already in existence between that Council and Service Provider.
- 3.1.5 Only when an individual has expressed a preference for more expensive accommodation than the Council would usually expect to pay (see Appendix A tables 1 and 2), will a third party or the resident be asked for a top up. This is in accordance with the Local Authority Circular LAC (2004) Guidance which states that:

The only time when a resident (or a third party on behalf of the resident) can top up is when;

- a) a resident explicitly chooses to enter accommodation other than that which the Council offers him or her and
- b) that preferred accommodation is more expensive than the Council would usually expect to pay.
- 3.1.6 The Health and Social Care Act (HSCA) 2001, sections 54 to 55, introduced a 'deferred payments' scheme, which enables a person who is, or will be entering Part III accommodation, and who would otherwise be liable to pay for it, whether in whole or part, to enter into an agreement whereby
 - a) the resident grants a legal charge in favour of the Local Authority in respect of any land specified in the agreement in which he or she has a beneficial interest (whether legal or equitable), for the purpose of securing the payment to the Local Authority of the total amount payable to them;
 - b) there is an 'exempt period', beginning with the time when the agreement takes effect and ending either;
 - i) 56 days after the date of the resident's death, or
 - ii) with any earlier date which the resident has specified in a notice given by him or her to the Local Authority;
 - c) during the exempt period, the resident will not be required to make payment to the Local Authority of any relevant contributions falling within the exempt period;
 - d) but the total amount of the relevant contributions shall become payable to the Local Authority on the day after the date on which the exempt period ends.
- 3.1.7 Residents that are subject to the 12 week property disregard or have agreed a deferred payments agreement with the council may make top-ups from specified resources on their own behalf. These are the only situations where the resident may top up. The most common arrangement is that a third party is providing the top-up. A third party in this case might be a relative, a friend, or any other source. This is in accordance with the Local Authority Circular LAC (2004) Guidance which states that:

The most common arrangement is that a third party is providing the top up, however a resident may make their own top up payments where either;

- a) the resident is subject to the 12 weeks property disregard, during which the resident can top up his or her own fees or
- b) the resident has entered into a deferred payment scheme with the Local Authority under the HSCA 2001 section 53, in which case the resident can top up his or her own fees.
- 3.1.8 In order to safeguard both residents and councils from entering into top-up arrangements that are likely to fail, the resident or the third party must reasonably be

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expected to be able to continue to make top-up payments for the duration of the arrangements.

- 3.1.9 In the event that the resident or the third party is unable to continue to make top-up payments the Council will arrange for the Resident to be moved to available accommodation that meets their assessed needs but is provided at the usual cost.
- 3.1.10 Where a top up is to be paid it shall be paid direct to the Provider.
- 3.1.11 In view of the Community Care (Delayed Discharges etc.) Act 2003, the Council has contingency arrangements in place, that address the likelihood that an individual's preferred accommodation will not always be readily available. The Council, upon request of the Service User in relation to their preferred accommodation, will where necessary operate a waiting list and the Service User shall be kept informed of progress.
- 3.1.12 The Council will never encourage or otherwise imply that care home providers can or should seek further contributions from individuals in order to meet assessed needs.
- 3.1.13 There are also a number of situations where the Council may need to pay for higher costs incurred over and above the usual prices indicated in Table 1 for providing residential care. Examples may include specialist care for specific user groups with high levels of need.

The guidance and regulations which are summarised in the following Sections 4-7 describe the minimum of choice that councils should offer individuals and states that councils should make all reasonable efforts to maximise choice as far as possible. Walsall Council is maximising real choice for Service Users through the use of framework contracts and the operation of Placement Lists.

4.0 Top Ups

Section 1.4 of LAC (2004)20 states that:

If an individual requests it, the council must also arrange for care in accommodation more expensive than it would usually fund provided a third party or, in certain circumstances, the resident, is willing and able to pay the difference between the cost the council would usually expect to pay and the actual cost of the accommodation (to 'top up'). These are the only circumstances where either a third party or the resident may be asked to top up.

Top-up payments should be distinguished from charges made for extra items not covered by the home's basic fees, which are permitted.

Sections 2.1 and 2.2 of LAC (2004)20 states that:

There should be a general presumption in favour of individuals being able to exercise reasonable choice over the service they receive....Where, for any reason, a council decides not to arrange a place for someone in their preferred accommodation it must have a clear and reasonable justification for that decision which relates to the criteria of the Directions and is not in breach of the Regulations. Individuals should not be refused their preferred accommodation without a full explanation from councils, in writing, of their reasons for doing so.

Sections 2.3 and 2.4 of LAC (2004)20 state that:

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The location of the preferred accommodation need not be limited by the boundaries of the funding council. Councils are obliged to cater for placements ... in any permitted care home within England or Wales...Funding councils may refer to their own usual costs when making placements in another council's area. However, because costs vary from area to area, if in order to meet a resident's assessed need it is necessary to place an individual in another area at a higher rate than the funding council's usual costs, the placing council should meet the additional cost itself.

The Directions state that a council must arrange for care in an individual's preferred accommodation subject to four considerations which are detailed within Section 2.5 of LAC (2004)20 as follows:

(a) Suitability of accommodation

Suitability will depend on the council's assessment of individual need. Each case must be considered on its merits.

(b) Cost

One of the conditions associated with the provision of preferred accommodation is that such accommodation should not require the council to pay more than they would usually expect to pay, having regard to assessed needs (the 'usual cost'). This cost should be set by councils at the start of a financial or other planning period, or in response to significant changes in the cost of providing care, to be sufficient to meet the assessed care needs of supported residents in residential accommodation. A council should set more than one usual cost where the cost of providing residential accommodation to specific groups is different. In setting and reviewing their usual costs, councils should have due regard to the actual costs of providing care and other local factors. Councils should also have due regard to Best Value requirements under the Local Government Act 1999.

Individual residents should not be asked to pay more towards their accommodation because of market inadequacies or commissioning failures.

Where an individual has not expressed a preference for more expensive accommodation, but there are not, for whatever reason, sufficient places available at a given time at the council's usual costs to meet the assessed care needs of supported residents, the council should make a placement in more expensive accommodation. In these circumstances, neither the resident nor a third party should be asked to contribute more than the resident would normally be expected to contribute and councils should make up the cost difference between the resident's assessed contribution and the accommodation's fees. Only when an individual has expressed a preference for more expensive accommodation than a council would usually expect to pay, can a third party or the resident be asked for a top up.

Councils should not set arbitrary ceilings on the amount they expect to pay for an individual's residential care. Residents and third parties should not routinely be required to make up the difference between what the council will pay and the actual fees of a home. Councils have a statutory duty to provide residents with the level of service they could expect if the possibility of resident and third party contributions did not exist.

Costs can vary according to the type of care provided. For example, the cost a council might usually expect to pay for short-term care might be different from its

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usual cost for long-term care. There are also a number of situations where there may be higher costs incurred in providing residential care, be it long or short-term. Examples include specialist care for specific user groups with high levels of need or where necessary to prepare special diets and provide additional facilities for medical or cultural reasons. Councils should be prepared to meet these higher costs in order to ensure an individual's needs are appropriately met.

(c) Availability

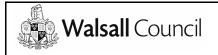
Generally, good commissioning by councils should ensure there is sufficient capacity so individuals should not have to wait for their assessed (that is, eligible) needs to be met. However, waiting is occasionally inevitable, particularly when individuals have expressed a preference towards a particular care home where there are no current vacancies.In view of the Community Care (Delayed Discharges etc.) Act 2003, councils should have contingency arrangements in place, that address the likelihood that an individual's preferred accommodation will not always be readily available. These arrangements should meet the needs of the individual and sustain or improve their level of independence. For some, the appropriate interim arrangement could be an enhanced care package at home.

Councils should give individuals an indication of the likely duration of the interim arrangement. Councils should place the individual on the waiting list of the preferred accommodation and aim to move them into that accommodation as soon as possible. Information about how the waiting list is handled should be clear and the individual should be kept informed of progress. If the duration of the interim arrangement exceeds a reasonable time period e.g. 12 weeks, the individual should be reassessed to ensure that the interim and preferred accommodation, are still able to meet the individual's assessed needs.

Councils should ensure that while waiting in temporary residential accommodation, if an individual has to contribute towards their care costs it is in accordance with the National Assistance (Assessment of Resources) Regulations 1992. Individuals who are waiting in these circumstances should not be asked to pay more than their assessed financial contribution to meet the costs of these residential care services which have been arranged by the council to temporarily meet their assessed needs and councils should make up the cost difference between the resident's assessed contribution and the accommodation's fees. Only when an individual has expressed a preference for more expensive accommodation than a council would usually expect to pay, can a third party or the resident be asked for a top up.

Councils should take all reasonable steps to gain an individual's agreement to an interim care home or care package.... Where patients have been assessed as no longer requiring NHS continuing inpatient care, they do not have the right to occupy indefinitely an NHS bed. If an individual continues to unreasonably refuse the interim care home or care package, the council is entitled to consider that it has fulfilled its statutory duty to assess and offer services, and may then inform the individual, in writing, they will need to make their own arrangements. This position also applies to the unreasonable refusal of a permanent care home, not just the interim care home or care package. If at a later date further contact is made with social services regarding the individual, the council should re-open the care planning process, if it is satisfied that the individual's needs remain such to justify the provision of services

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and there is no longer reason to think that the individual will persist in refusing such services unreasonably.

(d) Terms and conditions

In order to ensure that they are able to exercise proper control over the use of their funds, councils need to be able to impose certain contractual conditions, for example, in relation to payment regimes, review, access, monitoring, audit, record keeping, information sharing, insurance, sub-contracting, etc.

The contractual conditions required of preferred accommodation should be broadly the same as those councils would impose on any other similar operation. Stricter conditions should never be used as a way of avoiding or deterring a placement. As with suitability, account should be taken of the nature and location of the accommodation. There may be occasions where it would be unreasonable for a council not to adapt its standard conditions and others where it would be unreasonable to expect it to do so. For example, councils should take into account the fact that care homes in other areas, or those that take residents from many areas, may have geared themselves to the normal requirements of other councils.

Councils should be flexible in such circumstances and avoid adding to the administrative burden of care homes.

5.0 More expensive accommodation

Section 3 of LAC (2004)20 guidance applies only where a resident explicitly chooses to enter accommodation other than that which the council offers them, and where that preferred accommodation is more expensive than the council would usually expect to pay. In certain circumstances, councils can make placements in more expensive accommodation than they would usually expect to pay for, provided a resident or a third party is able and willing to make up the difference (to 'top up'). Residents that are subject to the 12 week property disregard or have agreed a deferred payments agreement with the council may make top-ups from specified resources on their own behalf. These are the only situations where the resident may top up. The most common arrangement is that a third party is providing the top-up. A third party in this case might be a relative, a friend, or any other source.

(a) Responsibility for costs of accommodation

When making arrangements for residential care for an individual under the National Assistance Act 1948, a council is responsible for the full cost of that accommodation. Therefore, where a council places someone in more expensive accommodation, it must contract to pay the accommodation's fees in full. The resident's or the third party's contribution will be treated as part of the resident's income for charging purposes and the council will be able to recover it in that way. However, under a deferred payments agreement, where the resident is topping up against the value of their home, their top-up contribution is added to their deferred contribution.

Councils will be aware that under section 26(3A) of the National Assistance Act 1948 (as inserted by the NHS and Community Care Act 1990), it is open to them to agree with both the resident and the person in charge of their accommodation that, instead of paying a contribution to the council, the resident may pay the same amount direct to the accommodation, with the council paying the difference. In such a case, the

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third party would also pay the accommodation direct on behalf of the resident. However, it should be noted that even where there is such an agreement for the resident to make payments direct to the accommodation, the council continues to be liable to pay the full costs of the accommodation should either the resident or relative fail to pay the required amount.

(b) The amount of the resident or third party top-up

The amount of resident or third party top-up payments should be the difference between the actual fee for the accommodation and the amount that otherwise the council would usually have expected to pay for someone with the individual's assessed needs.

(c) Price increases

Arrangements between the council, resident and third party will need to be reviewed from time to take account of changes to accommodation fees.

There will also be changes to the council's usual cost, however, fees and usual costs may not change at the same rate, and residents and third parties should be told that there cannot be a guarantee that any increases in the accommodation's fees will automatically be shared evenly between the council and/or the resident or third party, should the particular accommodation's fees rise more quickly than the costs the council would usually expect to pay for similar individuals. A council may find it useful to agree with the resident (or third party) that the resident's (or third party's) contribution will be reviewed on a regular basis on the understanding that clear explanations for proposed increases are given.

(d) Responsibilities of residents and third parties

Councils should make clear to residents and third parties, in writing, the basis on which arrangements are to be made when they seek to exercise their right to more expensive preferred accommodation. It should be clear from the outset to the resident, third party and person providing the accommodation that:

- failure to keep up top-up payments may result in the resident having to move to other accommodation unless, after an assessment of need, it is shown that assessed needs can only be met in the current accommodation. In these circumstances, councils should make up the cost difference between the resident's assessed contribution and the accommodation's fees. Where a resident's top-ups are being made against the value of property subject to a deferred payments agreement, a council will have assured itself from the outset that top-up payments are viable and recoverable when the home is sold;
- an increase in the resident's income will not necessarily lessen the need for a top-up contribution, since the resident's own income will be subject to means testing by the council in the normal way;
- a rise in the accommodation's fees will not automatically be shared equally between council, resident (if making a top-up), and third party.

(e) Suitability and Conditions

The criteria of suitability and willingness to provide on the basis of normal conditions should be applied in the same way as for other preferred accommodation. An

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exception to this is that it would be reasonable to expect providers entering this kind of arrangement to agree to do so on the basis that the council has the right, subject to notice, to terminate the contract should the resident's or third party's top-up payments cease to be adequate.

(f) Liable relatives

Liable relatives who are making maintenance contributions cannot act as third parties for the care of the relative to whose care they are already contributing under section 42 of the National Assistance Act 1948. This limitation does not apply to top-up arrangements agreed prior to 1 October 2001 with liable relatives.

Neither does the limitation apply to liable relatives who are not making contributions under section 42 of the 1948 Act.

Individuals already resident in residential care

Section 4 of LAC (2004)20 guidance considers Individuals already placed by a council in residential accommodation, and those already in residential accommodation as self-funders but who, because of diminishing resources, are on the verge of needing council support, have the same rights under these Directions as those who have yet to be placed by the council. Any such individual who wishes to move to different or more expensive accommodation may seek to do so on the same basis as anyone about to enter residential care for the first time. Should a self-funder who is resident in a care home that is more expensive than a council would usually expect to pay later become the responsibility of the council due to diminishing funds, this may result in the resident having to move to other accommodation, unless, after an assessment of need, it is shown that assessed needs can only be met in the current accommodation. In these circumstances, neither the resident nor a third party should be asked for a top-up payment and councils should make up the cost difference between the resident's assessed contribution and the accommodation's fees.

Individuals who are unable to make their own choices

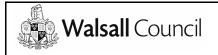
Section 5 of LAC (2004)20 guidance identifies that there will be cases in which prospective residents lack capacity to express a preference for themselves. It would be reasonable to expect councils to act on the preferences expressed by their advocate, carer or legal guardian in the same way that they would on the resident's own wishes, unless that would in the council's opinion be against the best interests of the resident.

6.0 Effect on contracting

Section 6 of LAC (2004)20 guidance identifies that any block contract or other form of contract that a council may have with a provider should not serve to limit choice. An individual should not be limited to care homes that hold such contracts with the funding council, or cares homes that are run by councils. It would not be reasonable for a council to use as a test for the suitability of accommodation, its presence or absence from a previously compiled list of preferred suppliers.

The Directions and Regulations do not, however, prevent an authority having a list of preferred providers with which it will contract where a potential resident expresses

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no preference for particular accommodation, nor from recommending such providers to prospective residents.

7.0 Information

Section 6 of LAC (2004)20 guidance considers that *individuals*, *and/or those who* represent them, need information on the options open to them if they are to be able to exercise genuine choice. They should be given fair and balanced information with which to make the best choice of accommodation for them.

Councils should explain to individuals their rights under the Directions and the Regulations. Councils should also consider providing material in a range of forms

including written leaflets in local community languages, Braille, on audio tape and in accessible language e.g. easy words, short sentences, large print and pictures (for those with learning disabilities). Councils should supply copies of the Directions and this guidance if requested in appropriate forms. They should work with local Primary Care Trusts (PCTs) and local hospitals to provide clear information to hospital patients as early as possible in their stay about what the council will be able to provide should they require short or long-term residential care at the end of their hospital stay. Individuals should be told explicitly that:

- they are free to choose any accommodation that is likely to meet their needs subject to the constraints set out in the Directions and the Regulations.
- they may allow the council to make a placement decision on their behalf;
 and
- they may choose from a preferred list (if the authority operates such a system).

Councils should ensure that individuals are informed that they have a choice of accommodation irrespective of whether they express a preference for particular accommodation. Individuals should also be told what will happen if the preferred accommodation is not available... Wherever possible, the individual should be encouraged to have a relative, carer or advocate present during the conversation. A written record of the conversation should be kept, in particular, recording any decisions taken or preferences expressed by the individual. This record should be shared with the individual.

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Appendix A Usual Costs and Bed Analysis

Table	Туре	Category	2009/10 £ / week
1	Residential	Older People	£356.50
2	Residential	Older People Elderly Dementia (EMI)	£374.50
3	Nursing	Older People	£471.00
4	Nursing	Older People Elderly Dementia (EMI)	£471.00
5	Continuing Health Care(1)	Older People	£550 - £600
6	Continuing Health Care(2)	Older People Elderly Dementia (EMI)	£550 - £600
7	End of Life Care (1)	Older People	£550 - £600
8	End of Life Care(2)	Older People Elderly Dementia (EMI)	£550 - £600
9	Residential	People Under 65 with Mental Health Problems	£374.50
10	Residential	People who Misuse Drugs and Alcohol	N/A
11	Residential – LD, PD, or SI	Larger Home - Standard Complexity	£356.50
12	Residential – LD, PD, or SI	Higher Complexity	£356.50 - £750
13	Residential – LD, PD, or SI	Highest Complexity	£750 - £1,650
14	Nursing	People Under 65 with Mental Health Problems	£471.00
15	Nursing – LD, PD, or SI	Larger Home – Standard Complexity	£471.00
16	Nursing – LD, PD, or SI	Higher Complexity	£471.00 - £750
17	Nursing – LD, PD, or SI	Highest Complexity	£750 - £1,650

Table 1: Summary of Tables Categories and Usual Costs

Table	Category – Older People	2009/10 £ / week	Care Homes	Total Beds	Care Homes @ IMR	Beds @ IMR	% ge of Bed
1	Residential	£356.50	33	1384	25	1086	78%
2	Residential Dementia (EMI)	£374.50	26	699	19	455	65%
3	Nursing	£471.00	17	720	12	515	72%
4	Nursing Dementia (EMI)	£471.00	7	382	6	330	86%
5	CHC (1)	£550 -£600	22	1012	20	971	96%
6	CHC (2) Elderly (EMI)	£550 -£600	11	582	10	578	99%
7	End of Life Care (1)	£550 -£600	19	669	17	626	94%
8	End of Life Care(2) Dementia (EMI)	£550 -£600	9	380	8	376	99%

Table 2: Established Usual Costs Including Bed Analysis Phase 1

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