

Wiltshire Council

Cabinet

22 April 2014

Subject: Personalisation Policy

Cabinet member: Councillor Keith Humphries - Public Health, Protection Services, Adult Care and Housing

Key Decision: Yes

Executive Summary

Wiltshire Council requires a personalisation policy to set out how it will comply with the requirement to offer all Council funded support through a personal budget.

A new personalisation policy will set out how the Council will identify and discuss the outcomes a person wants to achieve.

The policy will state that people can be offered a non-means tested period of support to build independence and avoid making long term decisions at a time of crisis.

The policy will state that the value of a personal budget will be calculated by agreeing the reasonable cost of a support plan, capable of achieving the outcomes identified and supporting a person's eligible needs.

Proposal

That Cabinet agree to the draft personalisation policy setting out how the value of a personal budget will be calculated and to carry out consultation.

Reason for Proposal

The Council currently does not have a personalisation policy and is required to consult on new policies and changes to related policies

James Cawley

Associate Director Adult Care Commissioning, Safeguarding and Housing

Wiltshire Council

Cabinet

22 April 2014

Subject: Personalisation Policy

Cabinet member: Councillor Keith Humphries - Public Health, Protection Services, Adult Care and Housing

Key Decision: Yes

Purpose of Report

1. The purpose of this report is to agree the draft personalisation policy to allow a consultation period to begin.

Background

2. Personalisation means that every person receiving support, whether through Wiltshire Council or funded by themselves, has choice and control over the shape of that support.
3. Personal budgets are a central part of the personalisation agenda to give service users choice and control over their care and support.
4. Personal budgets can be defined as an allocation of funding given to users after an assessment which should be sufficient to meet their assessed needs.
5. Users can either take their personal budget as a direct payment, or – while still choosing how their care needs are met and by whom – leave councils with the responsibility to commission the services. Or they can have some combination of the two.
6. Councils in England were set a target of having 70% of users of community-based services and carers with a personal budget by April 2013 by the government.
7. The Council currently achieve 86% of people having a personal budget by the end of 2013/14. This represents a significant improvement from 2012/13 where 31% of people had a personal budget.
8. The Care Bill includes plans to make personal budgets a mandatory part of all care plans, meaning they would apply to all council-funded users - including those in residential care - from the bill's point of implementation. This has been pencilled in as April 2015.

9. In order to fully adopt this requirement the Council needs to have a personalisation policy in place that sets out how personal budgets are calculated and given to people.
10. The adoption of personal budgets impacts on the Council's current policies for Charging and Eligibility, which need to be updated to improve clarity on how decisions are made.

Personalisation policy

11. The personalisation policy (See Draft Personalisation Policy Appendix A) will cover all adults over the age of 18. The policy needs to ensure that everyone in Wiltshire is treated in the same way. Therefore the principles for the policy should be about:
 - a) Fairness
 - b) Transparency
 - c) Maximising customers' control of their care and support

Main Policy Areas

Maximising independence

12. The policy sets out that any support funded by the Council should maximise a person's independence and be offered on the basis of "just enough support". It will do this by.
 - a. all assessments will focus on outcomes.
 - b. everyone will be offered a time limited period of initial support that is focused on helping a person to regain independence to reduce or remove the need for long term support
 - c. initial support (intensive support focused on reablement) will be offered to all people who meet the eligibility criteria for support but will be non-means tested (free).
13. This will mean people who are eligible for support who have had a crisis, or are leaving hospital will receive a period of free support to help them regain their independence before any decisions about long term care are taken.

Calculating the value of a personal budget

14. A number of Councils have adopted a Resource Allocation System (RAS) to help them calculate the value of personal budgets. They do this by inputting a person's assessment details into a system that turns that information into a financial value.
15. The policy sets out that Wiltshire does not intend to use a RAS as we do not believe it meets the first two principles of the policy of fairness and transparency.

16. The policy states that the Council will calculate a personal budget by establishing the 'reasonable' cost of the support a person needs to meet their eligible needs and outcomes, referred to as a person's support plan.
17. Personal budgets that are managed by the individual, not the Council, are given to people through a direct payment.
18. The rates used to calculate the costs of a person's support would be based on the rates it would cost the council to pay for those services through commissioned services.

Carers

19. The new bill gives carers the same rights as people who are cared for. Carers will be entitled to an assessment, support plan and personal budget, in the same way as people who are cared for can have their own support plan.
20. The personalisation policy proposes to adopt the new requirements for supporting carers, as set out in the Care and Support Bill.
21. Carers currently are only able to access sitting service or respite support. On implementation of the bill, the policy will enable carers to have a support plan that is more aligned to their needs and have greater flexibility around what their support plan can include.

Public Health Implications

22. Implementation of the personalisation policy will help to ensure more people have access to appropriate information about the type of support they can access and so help them to live healthier more independent lives.
23. The policy promotes greater equality and fairness in allocation of Council resources. This should ensure some of the harder to reach groups across the County have increased levels of access to the support available and thus help to reduce health inequalities.
24. Careful monitoring of the scheme will be essential to mitigate the possibility of the financial abuse of persons and carers receiving a personal budget. Financial abuse counted for 15% of all investigated alerts of over 65s in 2012/13.

Environmental and Climate Change Considerations

25. This paper includes no proposals that impact on environmental and climate change

Equalities Impact of the Proposal

26. Implementation of the personalisation policy would ensure everyone in Wiltshire with care and support needs is treated fairly and equitably.

27. Current operational practices try to ensure everyone is given an equal chance of accessing support, but this is not transparent to the people affected. Implementation of the policy will mean the Council can clearly state how the Council will make decisions around the support they are prepared to fund.
28. By adopting the same policy and procedures for Carers, the Council will ensure that it has systems in place in time for introduction of the new bill and that it treats carers in the same way that it does cared for people.

Risk Assessment

29. Risks that may arise if the proposed decision and related work is not taken.
 1. Reputational risk to the Council if it does not meet the requirements in the new care and support bill to offer all people a personal budget
 2. The Council has a legal challenge based on a lack of transparency about how it made decisions about the support made available to a person following an assessment
30. Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

	Risk	Action to mitigate the risk
1	Carers and Carers action groups are upset by the policy change	Consult with Carers and Carers support groups
2	The Councils adult social care costs increase due to raised awareness of what support can be provided	Monitor take-up and demand for support and adjust budget projections
3	Differences between 0-25 service and adult social care in calculating support costs	Discuss with 0-25 team policy implementation

Financial Implications

31. The introduction of the new care and support bill is expected to raise the profile of the support people can expect. The increased transparency may lead to increased numbers of people approaching the Council for support.
32. The Care Bill will also have a significant impact on operational teams. Impact assessments are currently being developed to better understand the costs of implementing the care bill.

33. Offering free initial support to people in a crisis is currently provided to new customers, but not people with an existing package of support. There would be a small budget pressure by extending this offer to people with existing support plans, who have been into hospital or change in their level of need. It would be expected that this cost would be off-set by reduced long term care costs as people would have been supported to regain independence.
34. The policy does not change the offer of free support to Carers. Additional funding through the Better Care Plan has been made available but work is on-going to understand the full financial impact from any increase in demand for Carers assessments and support.
35. Adoption of the broader principles of the personalisation policy do not have a direct financial impact, the principles simply describes how we should be working with people to help them find the most appropriate support.

Legal Implications

36. The personalisation policy is intended to give the public information on how the Council makes decisions on what support is offered and how the financial value of that support is calculated. This will reduce the likelihood of people challenging the decisions made by the Council about the support they can fund.
37. The Council has a statutory duty to support people who are assessed as having eligible needs. The personalisation policy clarifies how the Council will fulfil this duty
38. The Council has a duty to support Carers. The new care and support bill will give carers the same rights as people who are cared for. The personalisation policy clarifies how the Council will meet this revised duty of care.
39. Councils will have a duty to offer people a personal budget. There is no legal requirement for Councils to have a RAS. The personalisation policy sets out how the Council will work out the value of a person's personal budget.
40. There is no legal reason why a Council should not charge for carers support. This is a decision that a Council is entitled to decide themselves

Conclusions

41. The Personalisation policy will mean the Council is well placed to implement the new care and support bill and will ensure the Council is fair and transparent about how it makes decisions about funding support.
42. Consulting and adopting the policies will help improve operational consistency and help ensure there is information advice available to people about how decisions on care and support are made.

43. Cabinet is therefore asked to agree to the draft personalisation policy and begin a period of consultation.

James Cawley
Associate Director Adult Care Commissioning, Safeguarding and Housing

Background Papers

None

Appendix A – Draft Personalisation Policy

APPENDIX A

Adult Social Care

Personalisation and Self Directed Support Policy

INSERT IMAGE

Policy Cover Information

Policy number	11	Version number	0.4	Status	Draft
Implementation lead	All adult social care managers			Implementation date	July 2013
Policy approved by	Adult Leadership Team			Date approved	July 2013
Next review date	August 2014				

Policy Control Sheet

Policy title	Personalisation and Self Directed Support
Purpose of policy	To explain how Wiltshire Council is implementing the principles of personalisation in line with national legislation and the intentions of locally elected councillors.
Policy author(s)	David Bowater
Lead Director	James Cawley, Strategy & Commissioning
Target audience	Frontline staff and members of the public
This policy supersedes	Direct Payments to Manage Your Own Care Financial Rules Self Directed Support
This policy should be read alongside	Eligibility Policy Charging Policy Safeguarding Policy Carers Strategy
Related Procedures	Help with managing your personal budget audit procedure Guidance and Procedure on Direct Payments
Monitoring and review lead	Executive Office
First year review date	November 2014
Subsequent review date	August 2015
Internet link	

This policy can be made available in a range of accessible formats if required.

Contents

- a.** The Personalisation Policy
- b.** Who Does It Cover?
- c.** Definitions
- d.** Key Principles
- e.** National Context
- f.** The Personalisation Process in Practice
 - Contact
 - Assessment
 - Support Planning
 - Delivery
 - Review
- g.** Monitoring and evaluation
- h.** Review
- i.** Appendix 1

The Personalisation Policy

Personalisation means that every person receiving support, whether through Wiltshire Council or funded by themselves, has choice and control over the shape of that support. This involves:

1. Ensuring that everyone has access to the right information, advocacy and advice so they can make informed decisions about their care and support.
2. Investing in preventive services to reduce or delay people's need for care and to promote independence and self-reliance among individuals and communities.
3. Developing local partnerships to produce a range of services for people to choose from and enhancing opportunities for social inclusion and community development
4. Working together with people to design, deliver and evaluate services.

Who Does It Cover?

This personalisation policy applies to all adults (aged over 18). People with a learning disability, physical disability, mental health need or other social care need will all have the same rights to a personalised approach for their care and support.

Support for carers is included within the principles of the personalisation policy. Carers should be supported in their role and enabled to maintain a life beyond their caring responsibilities. Wiltshire's Carers Strategy sets out how this is achieved in more detail.

Definitions

Personalisation is sometimes known as **self directed support**. Self directed support is the way that social care assessment, support planning and service delivery is made available so that more choice and control is given to individuals. It puts the person at the centre of the planning process, recognising that they are best placed to understand their own needs.

Support plans will be developed for those meeting the council's eligibility criteria. These will set out the support needed to help address people's assessed need and the cost of this. They focus on delivering a set of agreed outcomes. Self directed support introduces **personal budgets** for people in Wiltshire. The aim of this is to ensure individuals' support is clear, fair and under their control. A personal budget is based on the cost of meeting an adult's needs and is made up of council funding and the person's assessed contribution. Individuals may choose to use their personal budget on a commissioned service, where the

council holds and manages the personal budget on the person's behalf, as a **direct payment** (an amount of money you can use to meet your needs) or as a combination of both.

The personal budget must be used to deliver the outcomes in the support plan. The size of a personal budget depends on a '**reasonable price**'. The reasonable price is an amount of money that a professional in the council's adult social care team thinks will meet the assessed needs; together with the details of what it would cost council commissioned services to address those needs. So this reasonable price is based on a balance of how effective a support plan will be; how cost-effective the support plan will be based on all the options; the level and complexity of need a person has; and the overall cost of a support plan.

An **allocated worker** is a trained professional who will be qualified to deal with your specific needs. This can be either a Customer Coordinator, Social Worker, Nurse, Occupational Therapist or Community Psychiatric Nurse.

A **carer** is someone who provides unpaid, informal support to a family member, partner, friend or neighbour. This could be because they are ill, frail, disabled or have mental health or substance misuse problems.

Key Principles

1. Ensuring that everyone has access to the right information, advocacy and advice so they can make informed decisions about their care and support.
This means:
 - Everyone is entitled to an initial assessment of their needs
 - We will help people find the right information about care and related services such as leisure and transport.
2. Investing in preventive services to reduce or delay people's need for care and to promote independence and self-reliance among individuals and communities.
This means:
 - We will support people in their own home, where this is the best use of resources
 - We will consider the best type of housing for people
 - We will offer initial support before an in-depth assessment takes place (except where some other form of support is already in place)
3. Developing local partnerships to produce a range of services for people to choose from and enhancing opportunities for social inclusion and community development.
This means:
 - We will support user led or customer led organisations, community networks and volunteers to enable people to access support in the community.

- We will offer informal carers an assessment of the support they might require to enable them to fulfil their role.
 - We will offer support to anyone that is eligible, regardless of their background.
4. Working together with people to design, deliver and evaluate services.
This means:
- We will offer individuals support plans with personal budgets and a choice of how these are delivered.
 - We will offer person-centred, responsive services; based on improving outcomes important to the individual.
 - We will enable and encourage independence, where possible. Some people are able to become more independent and if you can we will help you.
 - We will offer 'just enough' support – not making long term decisions at a point of crisis but ensuring support is time limited and reassessed to meet people's needs without creating dependency.
 - We will be transparent. People will know what the Council will contribute to the cost of their care and support based on a good understanding of a person's needs and the best way of meeting them to get the desired outcome.
 - We will be fair. Regardless of background, people with similar needs will have similar Personal Budgets.
 - We will empower. People can use their Personal Budget to arrange their care and support as they want it, to meet their agreed outcomes.

National Context

The following statements of legislation and guidance provide much of the context for Wiltshire's Personalisation Policy – together with the emerging legislation in the Care Bill.

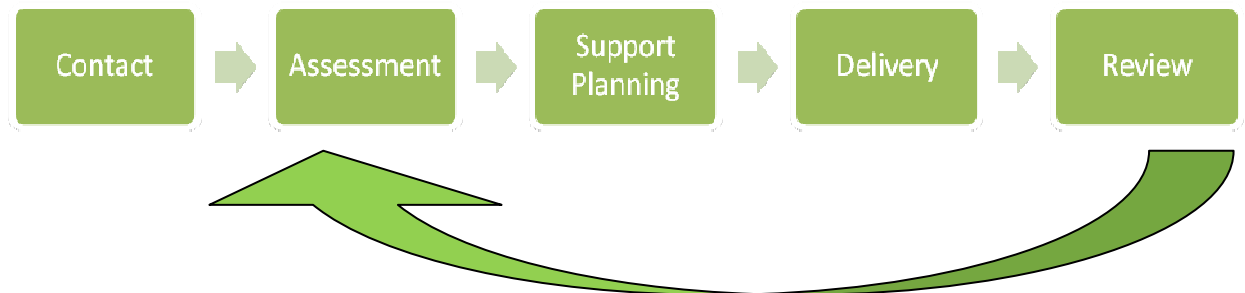
- *Health and Social Care Act (2001)*
- *Independence, Wellbeing and Choice (2005)*
- *Our Health, Our Care, Our Say (2006)*
- *Local Government and Public Involvement in Health Act (2007)*
- *Putting People First concordat (2007)*
- *Supporting people with long term conditions (2007)*
- *Transforming Adult Social Care (2008)*
- *The Independent Living Strategy (2008)*
- *A vision for adult social care (Nov 2010)*
- *Think Local Act Personal (Nov 2010)*
- *Adult Social Care: Choice Framework (May 2013)*

[The Putting People First \(PPF\)](#) concordat, in particular, provides a vision for truly personalised services where we promote health and wellbeing, and ensure proactive, planned, coordinated and integrated services.

[Think Local Act Personal](#) is a partnership of organisations which aims to deliver personalisation.

The Personalisation Process in Practice

People who find everyday tasks difficult, or help someone who does, may be eligible for support from Wiltshire Council. If they are eligible, personalisation means that they will have more choice on how this support is delivered. This includes having a say in discussions about needs, the level of support, how the support is provided and in reviews of support. The 5 stages of the personalisation process in Wiltshire are set out below.



1. Contact

- Information about social care can be found on Wiltshire Council's website. You can make contact via the website, email (customeradvisors@wiltshire.gov.uk) or by telephoning Wiltshire Council on 0300 456 0111. Urgent help outside working hours, is available on the Emergency Duty Service on 0845 60 70 888
- Many people may only require information and advice from us, preferring to make arrangements for their own care. Customer Advisors will discuss what options are available for you so that they can help decide on the best course of action in your particular situation. This may be to provide information and advice or signposting to existing community services provided by all kinds of organisations.
- You can be referred to us by your GP, a family member, another NHS professional or other person acting on your behalf - or you can self refer. Anyone who feels they need an assessment to help them can ask for one. If you are a carer you also have a right to an assessment of your needs.
- Where it is immediately clear that Wiltshire Council will not be able to offer support the teams will offer you advice and information about other services that may be available locally from independent organisations and community groups.

2. Assessment

- If a more in-depth assessment of current and future need is required, your details will be passed on to a relevant professional who will be an allocated worker. The allocated worker will be the most appropriate professional – such as a Customer Coordinator, Social Worker, Carer Support Worker or Occupational Therapist.

- The allocated worker will either: 1. contact you and ask if you would like to complete a simple self-assessment form (sent through the post and returned to the team) to establish if you might require a full assessment of care needs; or 2. make arrangements to visit you at home to carry out the assessment.
- You will be considered for your suitability for initial support services. These services provide planned, short term, intensive help and are designed to help a person restore their independence, to help them to do as much as they can for themselves, rather than someone doing things for them. Initial support under the Help to Live at Home programme can be offered free for up to 6 weeks, with progress monitored on a weekly basis, in situations where future need is likely to be reduced. In other circumstances, initial support or reablement activity may be subject to means testing under the council's Charging Policy. Initial support will normally be offered ahead of any in-depth assessment taking place. If you are a carer you may also be offered support to enable you to take a break from your caring role.
- The assessment will be carried out with your full involvement and, with your consent, those of any carer, to provide an understanding of your situation and care needs. This aims to establish what you cannot do that you need help with and will involve:
 - Informing you of the timescale for assessment
 - Listening to your views and your situation as a whole
 - Carrying out a full assessment and recording these details, including the desired set of outcomes you would like to achieve
 - Sending you (and other relevant people, with consent) a copy of that assessment
 - Comparing your needs with our [eligibility criteria](#).
 - Deciding if you are eligible for our assistance.
- The Mental Health, Learning Disability and Long Term Conditions procedures describe the approach we will take when an individual does not have the mental capacity to participate fully in the assessment. If other people are involved in an individual's assessment or ongoing management of their care, we will carry out a risk assessment in line with our Safeguarding Policy.
- The Council will explore all reasonable opportunities to enable you to remain at home (or continue in your caring role should you wish to) before looking at other options.
- You will be provided with information about organisations providing financial and benefits advice when this is appropriate. If eligible for support from the council this will be provided by our Finance and Benefits Team.
- By the end of the assessment the Council will have been able to identify what your needs are and which qualify for help from the council.

3. Support Planning

- Where long term Council funded support is required (based on eligible,

unmet need identified during the assessment and the Council's Charging Policy) a Support Plan can be developed by you, or by someone chosen by you (such as a nominated carer), with staff or a provider, or by the Wiltshire Centre for Independent Living (WCIL).

- The Support Plan sets out 'just enough' support to help you (no matter where the money comes from) to achieve the desired set of outcomes identified in the needs assessment. You may wish to include other outcomes that do not meet the Council's eligibility criteria in your support plan, but, these will not be included when calculating the Personal Budget.
- Support plans will be time-limited to ensure that you are supported but not made dependent and that reviews are built in at appropriate points.
- The outcomes should be underpinned by the principles of increasing independence and reducing long-term need for support where possible. In keeping with this, Support Plans should make the most of any existing social support networks.
- Where unpaid support is identified it must be clear what proportions of the assessed needs are being met through informal support, and what the impact on informal carers (or volunteer carers) will be of continuing to provide this support. If not already undertaken, a Carer's assessment will be offered in this circumstance.
- You will be provided with the cost of the commissioned services required to meet your eligible needs (that is, how much Wiltshire Council would reasonably expect the support to cost us). This is the basis of your Personal Budget.
- The cost of support can differ widely depending on needs, place and demand. The rates that calculations are based on will be made available to you. The rates used to establish the reasonable value of elements of support plans are set out in Appendix 1.
- A Personal Budget is made up of social care funding and the person's assessed contribution (as per the charging policy. If you are a Carer you will not be asked to pay towards the cost of any services you receive). You may choose to use your personal budget on a commissioned service, where Wiltshire Council holds and manages the Personal Budget on your behalf, or receive some or all of the Council's contribution as a Direct Payment.
- Once the Personal Budget is agreed, a final support plan will be developed and agreed. The Council must sign off support plans which include Council funding to ensure that eligible needs will be met and any risks managed.
- A Personal Budget can only be used to meet eligible social care needs as stated by the Eligibility (How we priorities needs) Policy and can only be used to buy support or services that have been identified in the Support Plan.
- The support plan will set out who will do what, with whom and when and will be written down and shared with all involved. It will focus on the outcomes that should be achieved and the positive risks people are prepared to take and how these will be managed.

- In circumstances where your needs fluctuate, in determining the level of support, we will take into account your circumstances over as long a period as is necessary to establish an accurate indication of the ongoing level of need. The support plan may include contingency plans and advance statements setting out what you want to happen when you are not well enough to manage the support.

4. Delivery

- An allocated worker will be identified to ensure the support plan is implemented.
- Where Direct Payments are chosen to deliver your support plan you can choose to buy care from an agency or employ your own personal assistant. A support service providing information and advice to those receiving Direct Payments is commissioned by Wiltshire Council, and provided by Wiltshire Centre of Independent Living. This support service can put you in touch with other people receiving, or considering, a Direct Payment as well. The [Care Choices website](#) also provides a useful source of information.
- One-off direct payments can be awarded, where such a payment will permit your needs or your carers' needs to be appropriately met (such as the purchase of a washing machine, driving lessons, or a leisure centre membership).
- Direct Payments cannot be used for NHS or other health services; permanent residential or nursing home care; or services which are directly managed or provided by Wiltshire Council (including Help to Live at Home initial support). If you receive Direct Payments you will be asked to open a separate bank account and provide records of how the money has been spent using a simple form (particularly when agreed outcomes are not being delivered).

5. Review

- Service providers will review Support Plans within the first couple of months, to check if there are any problems with your support arrangements and whether the outcomes are being met. If there are problems, you can either sort them out directly with the people involved, or ask us to help. If you receive Help to Live at Home, any problem should be raised with the providers first.
- Existing support plans and financial contributions will be reviewed at regular intervals (not longer than 12 months). In addition, anybody involved with your support can ask for a review at any time if there is a change of circumstances.
- Support plans are reviewed to ensure that the services provided continue to meet your needs, that the agreed outcomes are being delivered and that you are still eligible for services. The cost of the service will also be reviewed to check whether it is still what we would reasonably expect for the support. You will always be invited to participate in reviews. The

intention is to support you and change plans as your needs change.

- Reviews of support will be undertaken with you and the notes shared with you and relevant others, with consent, where appropriate.
- Where a change to the services provided is required, the support plan will be changed accordingly. Sometimes an entirely new support plan will need to be produced if the needs have changed significantly; in which case a full reassessment will be required.
- When following a review, it is planned to withdraw services, the allocated worker will be satisfied that your needs are no longer eligible.
- Reviews will ensure that your independence and rehabilitation is promoted, except where risks are such that you are in need of protection from harm by yourself or others.

Monitoring, evaluation and review of this policy

You are at the centre of everything we do. We will regularly ask for your views about the services you receive and respond by shaping those services accordingly. In all cases our aim is to get the appropriate support in as quick as possible and we will be monitoring this to ensure it happens.

You may wish to challenge various decisions, such as: the accuracy of the assessment; the value of the council's contribution to the Personal Budget; the cost of your contribution; the nature of the support you agreed in your Support Plan; or decisions regarding community or residential care. In such cases, you will be provided with a full and clear audit trail to explain why decisions were made. First of all, you should discuss and negotiate the decisions with your allocated worker while the decisions are still being made. If you are still unhappy your case can be referred to the allocated worker's line manager for further discussion and negotiation. For plans which address particularly complex needs (including issues of reasonableness, risk and safety) there is also the opportunity to refer your case to a Risk Enablement Panel. Our [complaints procedure](#) can also be used at any time.

Advocacy and support on complaints is available from SWAN advocacy services (<http://swanadvocacy.org.uk> / 01722 341851).

Feedback on the Council's policies in general is welcome. Please email the document author.

Together with your feedback, complaints information and feedback from staff, the information will be used to improve the Council's policies and procedures in future.

A review of this policy will take place in November 2014.

Alongside this document, procedural guidance will be updated to provide clear 'ground rules' for how personalised services will be applied. Guidance will address how the policy impacts on individuals already receiving services and individuals already receiving a Personal Budget and subject to a review.

Rates used for establishing the reasonable cost of a support plan

Wiltshire Council cannot advise on the rates individual care agencies charge.

The current rates for commissioned services are:

Insert current rates at time start consultation

Where needs are complex, the personal budget will cover what it would cost WC to commission a non-standard service. There are no standard rates in such cases so we use the rates for specialist provision that are capable of meeting the individual's needs.

Day Care Services

Order of St John's rate - £11.58

Respite Provision

Order of St John's rate - £519.20

Telecare

Base Units - £3.75

Response Service - £4.00

We will share how we came to the total personal budget. This will be based on rates outlining the cost of support - the reasonableness of these rates is based on the council's commissioned rate for meeting the eligible needs.