



Strategic
Plan 2016-19



Mulungu
Aboriginal Corporation
Primary Health Care Service

01

Vision,
Mission
& Values

02

Message
from the
Board

04

Message
from the
CEO

06

Infancy &
Early Childhood
(0-8 years)

08

Education

10

Employment

12

Economic
Development

14

Healthy
Lives

16

Safe,
Healthy
Communities

18

Cultural
Revival

20

Organisational
Development

24

Aligning our KPIs
with recognised
performance
frameworks

VISION

Life changing primary health care.

MISSION

Mulungu is an Aboriginal Community Controlled Organisation working to improve health outcomes and wellbeing for the Indigenous community of Mareeba. We do this by providing comprehensive primary health care services that respond to the physical, spiritual, cultural and emotional and social wellbeing needs of the community and by empowering the community to manage their own health and wellbeing.

VALUES

Board—Being honest, loyal to our organisation, acting with respect, strengthening our relationships with our stakeholders, respecting confidentiality, and providing good governance for Mulungu.

Staff—Being honest, loyal to our organisation, acting with respect, including respect for our client's privacy and confidentiality, being a good role model for our community, and acting with integrity.

Community—Being honest and acting with respect.

MESSAGE FROM THE BOARD



This strategic plan focusses our work on the national *Close the Gap on Indigenous Disadvantage* targets and further builds on our work with our partners and our community to deliver our vision for *life changing primary health care*.

As Directors, we are committed to the vision and mission of Mulungu Primary Health Care Service and to working collaboratively through good governance to “close the gap”.

We recognise that choosing a healthy lifestyle comes through informed decision making, access to resources, a good education and opportunities. Our strategy over the next three years places an emphasis on supporting our families and ensuring our children have an equal start to life. The design and delivery of our services supports a ‘hand up not a hand out’ approach.

Our work over the past six years has positioned us well to extend our objective in taking a holistic approach to address the health needs of our people with strategies that provide sponsorship for tertiary placements for our people in the areas of health education and through strategies to further support employment opportunities for our people, which go beyond work-placement opportunities within our organisation.

Our overall goal for this three-year plan is for the future health of our community and people to be better than what we have today, which for our community is to be stronger and healthier.

→ **Rhonda
Dooley
Chairperson**

MESSAGE FROM THE CEO → Gail Wason



This three-year plan represents the culmination of a 10-year strategy focussed on a single goal to improve the health and wellbeing of our people.

Our first plan titled “Our Vision for the Future” set out to build a purpose-built health facility to support the delivery of culturally appropriate, high quality health services in line with Australian health standards. We realised this goal with self-generated funds meeting 70% of the cost of what now is a modern health facility centrally located in Mareeba that brought all of our staff and services into a single location.

Following on from this, our 2013 – 2016 plan titled “Going Forward” consolidated and strengthened our model for health care, including partnerships within the health sector and across other sectors, in order to realise our vision to provide “life changing primary health care”. This goal was harder to achieve than raising funds for a new health facility as providing high quality, safe health care is complex and the needs of our community are even more complex. And because we recognise there is always more we can do to be more effective. But our achievements over the past three years have positioned us well for our next challenge.

The theme of our 2016 -2019 plan is “Working to Close the Gap”. With the hard work of the past six years behind us, we are ready to expand our strategic outlook and place greater emphasis on the determinates of education and employment on health inequality.

In shaping this plan, we have used six areas of the national Close the Gap strategy commencing with strategies to support an equal start to life through early intervention and support to our families. Our focus on

**place greater emphasis
on the determinates
of education and
employment on
health inequality**

education will see us working more closely with families, schools and other community services, extending our reach and wrap-around support for our young people’s journey.

While we are a major employer within the Mareeba community of Aboriginal and Torres Strait Islander people we are also committed to doing more to support our community to find meaningful employment through traineeships and supporting “work ready” initiatives to create employment through economic development.

To support healthier lives, we will continue to place an emphasis on evidence based practice, collaborative partnerships, and linkages with other service providers as we know that we cannot improve the health and wellbeing of our community on our own. Importantly, we will continue to support our community in taking greater responsibility for their health.

We will also place an emphasis on working with our community to support a safe and healthy community by forming alliances to ensure our health promotion activities are effective in communicating with our community the harmful effects of alcohol, drugs and gambling.

This plan also acknowledges the very important need to support and preserve our culture to maintain strong connections with our forefathers’ vision in planning our future.

Finally, this plan outlines a range of strategies to strengthen Mulungu’s leadership, our focus on our community, our people, and to build on our success.

I look forward to working with you to help us to make our community stronger and healthier.



INFANCY & EARLY CHILDHOOD (0-8 YEARS)

- 1 Implement a whole of life approach to guide, support and encourage change at the individual and family level.
- 2 Implement a peer support program for “at risk” families at the early stages of pregnancy.
- 3 Utilise health promotion materials educating families on the harmful effects of smoking during pregnancy and on children, and provide a range of intervention services.
- 4 Implement and expand programs aimed at establishing healthy eating patterns.
- 5 Utilise health promotion resources to educate our community on the harmful effects of alcohol.
- 6 Upskill staff and community in recognising early warning signs of the impact of mental health issues, in particular depression and baby blues.
- 7 Implement a “fathers program” aimed at developing bonds between father and child, providing safe and loving baby handling skills, and in increasing fathers’ understanding of the stages of child development.
- 8 Increase health checks to support the early identification of adverse developmental issues in order to give children the best start in life.
- 9 Implement a process to engage families in improving oral health care as per recommended levels of care.
- 10 Increase access for families to health services through increased referrals to our health services from the Child Family Centre (CFC).
- 11 Expand the parenting program to support parenting routines which give children a good start to life.
- 12 Increase appointment availability for on-site allied health services for children (2 – 8 years) diagnosed with a speech delay or other developmental issues.

support parenting
routines which
give children a
good start to life

EDUCATION



- 1 Increase access to our Play and Learn activities to prepare children for a life of learning.
- 2 Increase parents' involvement in the Play and Learn program that aims to provide parents with the tools to support a safe, stimulating learning environment for children in the home.
- 3 Continue to mentor parents through the WannaBe program that aspires Aboriginal and Torres Strait Islander people to complete grade 12 and continue on to tertiary level in order to secure better futures for themselves and their families.
- 4 Extend the reach of the Child Family Centre (CFC) and promote services to ensure our children are meeting the early developmental milestones.
- 5 Increase case management for CFC clients identified as "at risk".
- 6 Explore opportunities to provide specialist services for children with identified learning difficulties.
- 7 Continue to work in partnership with schools to improve self-esteem and self-respect of our children through cultural identity and belonging.
- 8 Continue to case manage families through the WannaBe program and expand the geographical reach of the program.
- 9 Secure funding to support continuity of the Kid's Club, a life learning skills program, to respond to the growing demand for the service.
- 10 Build capability of staff through upskilling opportunities, exposure to evidence based practice, on the job work experience, and through formal education and training.

support a safe, stimulating learning environment for children in the home

1. Institute for Urban Indigenous Health (IUIH) in South East Queensland funded by Queensland Health

- 11 Secure funding to implement the Deadly Choices School Based Program in Mareeba, which focuses on leadership, chronic disease, physical activity, nutrition, smoking, harmful substances and health servicing. The program aims to "empower Aboriginal and Torres Strait Islander people to make healthy choices for themselves and their families, to stop smoking, to eat good food and exercise daily"¹.
- 12 Secure funding to increase our children's attendance at school through a youth program aimed at planning pathways, supporting career aspirations, maintaining social and emotional wellbeing and staying healthy.
- 13 Through dedicated funding, provide a mentoring program through the establishment of formal study groups to improve school attendance and individuals' understanding of their school subject areas.
- 14 Increase health literacy in order to empower and support people to take responsibility for their health.
- 15 Utilise technology to improve self-management of health conditions and support health staff to assist clients in accessing the health care they need.
- 16 Encourage Aboriginal and Torres Strait Islander participation on the Parent's and Citizens Committee.



EMPLOYMENT

- 1 Continue the parent mentoring program provided through our Family Services programs, that aims to inspire Aboriginal and Torres Strait Islander people to secure better futures for themselves and their families.
- 2 Develop resources to assist families to visualise and plan pathways to employment through our Family Services programs.
- 3 Create access for Aboriginal and Torres Strait Islander people to entry level employment opportunities through partnerships with stakeholders, including employment agencies.
- 4 Continue to offer work base traineeships for Aboriginal and Torres Strait Islander people through Mulungu.
- 5 Develop a program to support school based traineeships as a pathway for attracting Aboriginal and Torres Strait Islander people into the health workforce.
- 6 Expand employment opportunities for Aboriginal and Torres Strait Islander people within Mulungu and through joint ventures with our partners.
- 7 Enhance Mulungu's recruitment and retention strategy to attract and increase the proportion of Aboriginal and Torres Strait Islander staff.

assist families
to visualise and
plan pathways
to employment

ECONOMIC DEVELOPMENT



→ hand up not
a hand out
approach...

- 1 Provide sponsorship for Aboriginal and Torres Strait Island people to enter tertiary level education into medicine.
- 2 Explore opportunities for economic development to create jobs for our community.
- 3 Investigate opportunities to access social capital investment to support social enterprises that will provide economic participation for our community.
- 4 Implement intervention programs to engage young people in meaningful activities which support their social and economic participation.
- 5 Extend the Men's Program to provide support in developing home gardens to promote economic participation and sustainable healthy food choices.
- 6 Undertake feasibility studies on viability and sustainability of investment options that have the potential to provide employment opportunities for our community.
- 7 Create opportunities to generate income through business ventures that create economic participation for our community.
- 8 Explore opportunities to further support Aboriginal and Torres Strait Islander people small business ventures.

...engage young people
in meaningful activities
which support their
social and economic
participation



HEALTHY LIVES

- 1 Increase access for clients to mental health assessment and support services and incorporate mental health first aid into all points of client engagement across all programs and services.
- 2 Support intergenerational change by building on our client's understanding of self-responsibility in managing their health in order to improve quality of life for themselves and their family.
- 3 Strengthen evidence based management of chronic disease.
- 4 Enhance care coordination for chronic disease management through targeted activities.
- 5 Review client engagement strategies to increase compliance with health care and case management plans.
- 6 Implement an organisation-wide strategy across all programs for all aged groups focused on smoking reduction and maintaining healthy weight.

- 7 Map service delivery processes of the "whole of life" journey of our clients to ensure Mulungu has purposeful engagement at each stage that ensures:
 - a. cultural responsive delivery mode
 - b. preventive health is focused on areas of need
 - c. connectedness between programs and services
 - d. monitoring and review processes are focused on critical areas
 - e. data is evaluated to measure performance against outcomes
 - f. evidence based success is documented
- 8 Embed into all services and programs the protocols of the National guide to a preventive health assessment for Aboriginal and Torres Strait Islander people.
- 9 Evaluate Mulungu's "whole of life" model against client health outcomes to determine effectiveness and identify opportunities for improvement.

- 10 Strengthen staff ownership of our health service's performance in improving health outcomes for our community.
- 11 Partner with Allied Health Services to deliver the Sugar Shaker Program, which builds peer support through a group therapy approach aimed at reducing weight and risk of chronic disease.

supporting intergenerational change by building on our clients understanding of self-responsibility in managing their health



SAFE, HEALTHY COMMUNITIES

create healthy
minds & healthy
bodies

- 1 Increase access for children and families to our Family Services programs that aim to support a safe healthy community.
- 2 Implement a nutritional program to promote healthy eating to improve health and wellbeing.
- 3 Through dedicated funding, support people “at risk” to be involved in sport and recreational activities to promote healthy minds and healthy bodies.
- 4 Continue the Strong and Deadly Women’s Program to empower and support women to overcome personal barriers.
- 5 Collaborate with other service providers to provide culturally appropriate access to housing and other social services to improve health and wellbeing for Aboriginal and Torres Strait Islander people.
- 6 Work in collaboration with the community and other services to develop and implement a strategy aimed to reduce substance misuse.
- 7 Review the organisation’s capacity to provide complementary services to people with a disability, e.g. sensory room.
- 8 Work in collaboration with the NATSIHA to develop a web portal that can be accessed through each of the alliance partners’ websites and other outlets to promote information on available services.
- 9 Investigate opportunities through the National Disability Insurance Scheme (NDIS) for Mulungu to provide services to clients with disabilities.
- 10 Investigate opportunities to extend the range of provider services for the aged, frail and disabled.
- 11 Engage with local justice groups to build community awareness of community reparation to reduce recidivism and incarceration rates.

CULTURAL REVIVAL



The Mooridiji Tribe, traditional owners of the land, who lived in the area between the waters towers and Granite Creek.

- 1 Continue the Yumba Healing Project that gives people a sense of where they come from and where they belong.
- 2 Continue documenting Aboriginal and Torres Strait Islander family trees to preserve family lineage and history to strengthen family bonds.
- 3 Convene community forums to facilitate sharing of information with Aboriginal and Torres Strait Islander communities.
- 4 Develop a Cultural Awareness package to support staff cultural proficiency and as a business opportunity for Mulungu.
- 5 Implement community recognition through culture acceptance acknowledging 10 years of service of our non-Indigenous staff.
- 6 Partner with other organisations to coordinate events pertaining to Aboriginal and Torres Strait Islander culture.
- 7 Work in partnership with schools to develop cultural competencies and encourage participation in community events and celebration of Aboriginal and Torres Strait Islander culture.
- 8 Work in partnership with Schools to develop cultural capabilities through community pathways.
- 9 Work in partnership with Schools to bring a greater awareness of cultural values which evidence suggests reduces school yard bullying, provides cultural and family connections to students, reduces short term suspension and increases school attendance².
- 10 Encourage Aboriginal and Torres Strait Islander people's participation on reconciliation working parties to develop a Reconciliation Plan for the Mareeba and the Atherton community.
- 11 Through dedicated funding, conduct annual boot camps with activities focused on supporting and strengthening relationships between father and son and the rite of passage into adulthood.

2. Evaluation of the National Partnership on Youth Attainment and Transitions Report for the Department of Education, 2014

celebration of Aboriginal and Torres Strait Islander culture

ORGANISATIONAL DEVELOPMENT

Leadership

- 1 Strengthen Mulungu's membership base with the intent of encouraging and supporting the next generation of leaders within the community.
- 2 Review the organisation's Board governance structure to ensure it is effective and best assists the governance of the organisation, going forward.
- 3 Strengthen the organisation's governance through the development of Board and management competency requirements.
- 4 Develop a leadership framework to support and develop leadership at all levels of the organisation.

encouraging and supporting the next generation of leaders within the community

Strategy and planning

- 11 Identify KPIs relating to our Family Services program and incorporate into our trend reporting requirements.
- 12 Review program coordination to strengthen targeted service delivery across programs.
- 13 Continue to provide clinical placements for nurses, GPs and health workers.
- 14 Develop a change management framework to guide and support change within the organisation.
- 15 Implement a process to support executive management to track outcomes against strategic and operational plans and to provide reports to staff on performance outcomes.

Focusing on Community

- 5 Collect and analyse community feedback to strengthen Mulungu's understanding of the community's needs in order to provide better services.
- 6 Develop a marketing strategy to promote Mulungu's message to its clients and the wider community.
- 7 Purchase and implement the Deadly Choices Programs that provides culturally appropriate targeted marketing resources.
- 8 Use a multi-pronged approach to gain consumer feedback on Mulungu's services, e.g. create a portal on Mulungu's website to support community feedback.
- 9 Review all of the organisation's databases to ensure they accurately collect, analyse and report performance data to meet Mulungu's requirements.
- 10 Engage an external consultant to review the clinical data management system to ensure the system capability meets future demands

strengthen Mulungu's understanding of the community needs

People management

- 16 Reinforce Mulungu's vision by ensuring it is reflected in the way we provide services to our community.
- 17 Promote team cohesion through staff involvement in cultural events and other community events external to Mulungu.

translating Mulungu's vision into the way we provide our service to our community



Process management, improvement, innovation

- 18 Ensure the quality management system includes all requirements for managing safety, quality and risk in healthcare.
- 19 Develop a training program to support good record keeping and data entry for all client service databases.
- 20 Schedule training for all staff in the quality management system.
- 21 Monitor Mulungu's productivity, safety and risk in using the NavMan system.
- 22 Ensure critical processes in each business area are documented and are in formats that support staff's understanding.
- 23 Strengthen the management culture to drive performance underpinned by accountability and transparency.
- 24 Develop and embed a risk management culture based on AS/ANZ 31000 Risk Management – Principles and Guidelines.
- 25 Utilise solar technology to reduce the corporation's environmental impact and to make the environment safer for the community.
- 26 Research technological advances in providing healthcare that enables Mulungu to realise efficiencies in service delivery and promotes client empowerment.
- 27 Explore opportunities to better utilise social media to strengthen engagement and communication with the community.
- 28 Develop staff profiles that communicate to external stakeholders the individual roles within the staff team.

Drive performance underpinned by accountability and transparency

Success

- 29 Mark our success through acknowledging, rewarding and celebrating Mulungu's achievements at the individual and team level.
- 30 As part of NAIDOC, convene community events to celebrate the achievements of Aboriginal and Torres Strait Islander people.
- 31 Record case studies that portray how Mulungu is working to "Close the Gap" for individuals and their families which illustrates how the work of Mulungu assists Aboriginal and Torres Strait Islander people to overcome the adverse impact of disempowerment.

How Mulungu is working to "Close the Gap" for individuals and their families



ALIGNING OUR KPIs WITH RECOGNISED PERFORMANCE FRAMEWORKS



Aboriginal and Torres Strait Islander Health Performance Framework

In measuring our success in implementing the Strategic Plan (2016-19), we will continue to use the *Aboriginal and Torres Strait Islander Health Performance Framework* (HPF), as a reference point. The HPF was designed to measure the impact of the *National Strategic Framework for Aboriginal and Torres Strait Islander Health* (NSFATSIH).

The HPF provides Mulungu with a framework to identify key performance indicators from the following dimensions: current health status and outcomes of Aboriginal and Torres Strait Islander people; the determinants of health, such as health behaviours and personal factors; and from the dimension of the performance of our health service.

The following table details the key performance indicators (KPI) within each of the HPF tiers. Not all sub categories within each of the 3 tiers of the HPF have been included. We have adapted the HPF to the scope of Mulungu's services and program.

Requirements for monitoring and reporting performance against each KPI are specified and trend reports are provided to management and the Board of Directors at 6 monthly intervals.

Results Based Accountability Framework

The indicators relating to the Mareeba Children and Family Service are performance accountability indicators extracted from the Results Based Accountability (RBA) framework. Performance indicators relating to the Mareeba Children and Family Service have been selected from the Results Based Accountability (RBA) framework. These indicators are designed to measure positive outcomes for children and their families through their participation in early years' activities.

ABORIGINAL AND TORRES STRAIT ISLANDER HEALTH PERFORMANCE FRAMEWORK		
TIER 1: HEALTH STATUS AND OUTCOME		MULUNGU KEY PERFORMANCE INDICATORS
HEALTH CONDITIONS	Low birth weigh	<ul style="list-style-type: none">– Increase in the mean birth weight to within 200 grams of the non-Indigenous population– Decrease in the incident of low birth weight by 10% (<2500 grams)
	Acute rheumatic fever and rheumatic heart disease	<ul style="list-style-type: none">– Number of active cases of rheumatic fever each year
	High blood pressure	<ul style="list-style-type: none">– % of Type 2 Diabetic clients with a BP =<130/80 mmhg– % of clients diagnosed with coronary heart disease with a BP =<130/80 mmhg
	Diabetes	<ul style="list-style-type: none">– % of patients treated to HbA1c =<7%– % of clients with Type 2 Diabetes with a HbA1c test in the last 6 months– % of Indigenous clients with Type 2 Diabetes
	HIV/AIDS, hepatitis and STI	<ul style="list-style-type: none">– % of clients in the 16-29 age group with STI screening completed
LIFE EXPECTANCY AND WELLBEING	Social and emotional wellbeing	<ul style="list-style-type: none">– % of clients with a Mental Health Care Plan (MBS Item 2715 or 2712) or GPMP (721)– Number of clinical supervision sessions SEWB staff have participated with the WSU– Number of clients provided with counselling through SEWB staff– Number of new SEWB case managed clients– Number of SEWB referrals to external agencies

ABORIGINAL AND TORRES STRAIT ISLANDER HEALTH PERFORMANCE FRAMEWORK		
TIER 2: DETERMINANTS OF HEALTH		MULUNGU KEY PERFORMANCE INDICATORS
COMMUNITY CAPACITY	Transport	<ul style="list-style-type: none">– Number of clients assisted with transport to Mulungu– Number of clients assisted with transport to external health services
HEALTH BEHAVIOURS	Tobacco use	<ul style="list-style-type: none">– % of smoking rate within the client 15+ age group– % of clients with smoking status recorded
	Health behaviours during pregnancy	<ul style="list-style-type: none">– % of women smoking during pregnancy– Reduction of smoking during pregnancy– % of women consuming alcohol during pregnancy– Reduction of alcohol consumption during pregnancy– % of women using illicit drugs during pregnancy– Reduction of illicit drugs use during pregnancy
PERSON RELATED FACTORS	Overweight and obesity	<ul style="list-style-type: none">– Reduction in the unhealthy weight BMI >30 within the male client population– Reduction in the unhealthy weight BMI >30 within the female client population– % of clients in the unhealthy weight range by age group

ABORIGINAL AND TORRES STRAIT ISLANDER HEALTH PERFORMANCE FRAMEWORK		
TIER 3: HEALTH SYSTEM PERFORMANCE		MULUNGU KEY PERFORMANCE INDICATORS
RESPONSIVE	Competent Governance	<div><div>– % of compliance requirements met within required timeframes</div><div>– Number of qualifications included in external financial audit report</div><div>– % of budget lines within a 15% variance in previous 12 months</div><div>– % of new staff have completed their orientation program and signed by supervisor</div><div>– % of staff who have participated in a performance review within the previous 12 months</div><div>– % of staff who have required licenses and other checks undertaken within required timeframes</div><div>– Workcover claims within 5% of gross wages budget</div><div>– Number of WHS incidences reported</div></div>
ACCESSIBLE	Access to services compared with need	<div><div>– % of clients diagnosed with chronic disease without a GPMP (MBS Item 721)</div><div>– % of clients diagnosed with diabetes attended allied health appointment</div><div>– % of other service providers that indicated Mulungu provided a high quality & vital health service</div><div>– % of clients surveyed that were satisfied with the health information shared by the clinician</div></div>
	Access to Mareeba Children and Family Service	<div><div>– Total number of children who identified as Aboriginal and/or Torres Strait Islander</div><div>– Total number of parent / carer who identified as Aboriginal and/or Torres Strait Islander</div><div>– Number of partnerships</div><div>– % of parent / carer who reported that they were satisfied with the activity</div><div>– % of parents/carers who receive intensive support</div></div>
EFFECTIVE/ APPROPRIATE/ EFFICIENT	Antenatal care	<div><div>– % of attendance for antenatal care within the first trimester</div></div>
	Immunisation	<div><div>– % of children 0-8 years with up to date immunisation</div></div>
	Health Promotion	<div><div>– Targeted SNAP health promotion activities</div></div>
	Early detection and early treatment	<div><div>– % of 0-14 age group within the population with current health checks</div><div>– % of 15+ age group within the population with current health checks</div><div>– % of women aged 27-65 years without a pap smear</div></div>

EFFECTIVE/ APPROPRIATE/ EFFICIENT	Chronic disease management	<div><div>– % of clients with chronic disease and a current health check</div><div>– % in the increase in the claiming of Cycle of Care (MBS Item Numbers 2517, 2519, 2521)</div><div>– Number of case conferences (MBS Item Numbers 747, 735)</div><div>– % of clients with a chronic disease with a case management plan</div></div>
	Early years' activities provided by Mareeba Children and Family Service	<div><div>– Number and percentage of parents / carers who report they are benefiting from participating in the activity</div><div>– Number and percentage of parents / carers report their child/children are benefiting from participating in the activity</div><div>– Number and percent of parents/carers improving their engagement with their child/children</div></div>
	Cultural competency	<div><div>– % of Indigenous population of Mareeba who are clients of Mulungu</div><div>– % of clients satisfied with their individual care</div></div>
CAPABLE	Accreditation	<div><div>– Maintain Accreditation against the RACGP Standards</div><div>– Maintain Certification against ISO 9001</div></div>
	Aboriginal and Torres Strait Islander peoples training for health related disciplines	<div><div>– 100% of staff have completed mandatory training</div></div>
	Mareeba Children and Family Service	<div><div>– % of staff qualified / trained to deliver early-years' service activities</div></div>
CONTINUOUS	Regular GP or health service	<div><div>– % of clients with diabetes with a current GPMP (MBS Item 721)</div></div>
SUSTAINABLE	Expenditure on Aboriginal and Torres Strait Islander health compared to need	<div><div>– Increase in Medicare revenue compared with the same period in previous year</div><div>– Increase in PIP funding compared with same period in previous year</div><div>– Increase in Health Worker Medicare Claims compared with same period in previous year</div></div>
	Recruitment and retention of staff	<div><div>– Number of funded positions</div><div>– % of staff survey responses that indicate overall satisfaction with the working environment</div></div>



HAND UP NOT A HAND OUT APPROACH...

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