# Annex B: Bury Council Cost of Care Report – Care Homes

# 1.Purpose of the Cost of Care Report

The purpose of the Care Home cost of care report is to demonstrate the process undertaken by Bury Council and that the cost of care identified is evidence based.

# 2.Introduction/Background

In December 2021 the government announced its white paper; [People at the Heart of Care](https://www.gov.uk/government/publications/people-at-the-heart-of-care-adult-social-care-reform-white-paper), which outlines an ambitious reform of social care. As part of this, and wider charging reform, the government launched the policy paper; [Market Sustainability and Fair Cost of Care](https://www.gov.uk/government/publications/market-sustainability-and-fair-cost-of-care-fund-2022-to-2023/market-sustainability-and-fair-cost-of-care-fund-purpose-and-conditions-2022-to-2023).

As part of the policy paper, Local Authorities were to be given access to a Fair Cost of Care Fund to support the implementation of charging reforms. The funding will help support Local Authorities to ensure compliance with Section 5 of the Care Act 2014 which outlines a local authority’s duty to “promote the efficient and effective operation of the care and support market”.

As a condition of receiving the grant funding Bury Council is to produce 3 annexes:

* **Annex A** - A Cost of Care Exercise delivered by surveying residential and nursing care home providers to determine a sustainable fee rate
* **Annex B** - A Cost of Care Report setting out how the Council arrived at the cost of care estimates presented in the Cost of Care Exercise
* **Annex C** -A provisional Market Sustainability Plan (MSP), setting out our local strategy for the next 3 years and demonstrating how we intend to move towards a sustainable fee rate

Annex A ,Annex B and a provisional version of Annex C is required to be submitted by 14th October 2022. A final version of Annex C will be submitted to the Department of Health & Social Care (DHSC) in February 2023 (exact date to be confirmed).

# 3.Bury Council’s Fair Cost of Care Exercise

**How Care Home Providers were Engaged**

Bury Council launched its Fair Cost of Care Exercise on 27th May 2022 with Care Home providers completing their submissions via an online Fair Cost of Care tool[[1]](#footnote-1).

**Appendix A** outlines the guidance provided to Care Home providers regarding the data required for populating the Fair Cost of Care tool[[2]](#footnote-2) and the suite of questions requiring responses from Care Home providers

The deadline for providers to submit their completed toolkit was 1st August 2022.Support and encouragement were given to providers via:

* Regular guidance sent out via Community Commissioning Team
* Care Home Provider Forums
* Weekly bulletin
* Drop-in support sessions for providers
* One to one support sessions offered.
* Discussion included in site visits by members of the Community Commissioning Team
* Direct contact to specific providers from the Strategic Lead encouraging uptake.

Provider response rate

Out of 28 in scope care homes, 10 (39%) providers submitted returns. Those 10 providers who did submit equated to 38% of beds commissioned by Bury Council.

The response rate is disappointing given the level of promotion, guidance and support offered by the local authority but in discussion with neighbouring authorities this return rate does not appear to be an outlier.

# 4.Fair Cost of Care Calculations

The information submitted by providers via the online Fair Cost of Care tool was the source data for deriving the figures in Annex A.

The results are at 2022/23 prices and are based on the median[[3]](#footnote-3) values for each expenditure line submitted by the providers (i.e., The results **are not** based on the median sub-total values of provider returns). Some providers did not put costs against all lines and consequently zeros were eliminated from the medians and quartiles calculations.

To ensure ‘like was being compared with like’, where providers had only submitted for financial year 2021/22 the median % uplifts for each expenditure line for those providers who submitted 2022/23 values were applied to each expenditure line for those providers submissions which only covered financial year 21/22.

All provider returns were reviewed in detail on a line-by-line basis and where further clarification, or detail was required the provider was contacted.

The four Fair Cost of Care estimates for Care Homes are summarised in Table 1 below and are analysed line by line in **Appendix B.**

**Appendix C** provides a line by linen expenditure analysis for the Lower quartile[[4]](#footnote-4) and Upper quartile of all expenditure line items in Appendix B.

**Appendix D** provides the count response

**Table 1**

|  |  |  |  |
| --- | --- | --- | --- |
| Median £ Per Resident Per Week | | | |
| 65+ care home places without nursing | 65+ care home places without nursing, enhanced needs | 65+ care home places with nursing[[5]](#footnote-5) | 65+ care home places with nursing, enhanced needs[[6]](#footnote-6) |
| £775.48 | £791.80 | £1,028.71 | £1,099.17 |

**Return on Capital**[[7]](#footnote-7)

For those providers who provided the current freehold value of their care home a 5% return on Capital was used when deriving the median weekly Fair Cost of Care calculation, which is within the range of DHSC guidance regarding establishing a reasonable rate of return on capital.

Where the freehold value wasn’t available the annual rental value was used to derive weekly return on capital per bed per week and included in weekly fair cost of calculation.

**Return on Operations**

For each of the 4 cost of care estimates the Return on Operations was calculated at a 5% markup on the providers operations and head office costs.

**Future Uplift Rates**

It is intended that future inflationary uplifts will recognise the annual uplift of the Real Living Wage (RLW) as per the Living Wage Foundation[[8]](#footnote-8) and the Consumer Price Index Including Owner Occupied Housing (CPIH)[[9]](#footnote-9)

# 5. Concerns and Limitations regarding the cost data received from providers

The following sections articulates the concerns impacting regarding confidence that fair cost of care rates accurately represents the likely actual average cost of providing care in a local area and that may later influence on the weight that is appropriate to place on reported costs in subsequent fee setting

**Low Provider Response Rate**

The relatively low provider response rate increases the risk on the reliability of the data with regards to potentially skewed costing results and invalid inferences, therefore questioning the validity of the four Fair Cost of Care estimates presented in this report.

**Provider Representation**

A number of smaller providers, who are potentially more cost efficient than national operators did not take part in the Cost of Care Exercise, therefore the overall low representation is likely to be distorting costs and confidence in their representativeness of the actual average.

**Affordability Risk**

The total cost impact figures coming out of the fair cost of care exercise will lead to significantly increased Care Home fees and consequently without an equivalent increase in financial support for Councils’ this will lead to a significant funding gap between current rates and the fair cost of care rates and therefore add pressure to already strained financial resources.

**Failure to account for the benefit of recent Government announcements**

The benefit of recent Government announcements such as the National Insurance increase reversal and the Business Energy Bill relief scheme will not be reflected in the costings submitted by providers.

**Impact of extraordinary costs in 2021/22 during the COVID pandemic**

There is a risk that providers have been unable to distinguish between ‘one off/extraordinary’ Covid related activity and ‘business as usual’ activity in their provider submissions and therefore data used to derive Fair Cost of Care estimates may be overstated.

**Regional Variation**

During the undertaking of the fair cost of care exercise, localities across Greater Manchester and the North-West have engaged in collaborative discussion to inform our approaches to the treatment of cost items and interpretation of fair cost of care guidance.

This work has highlighted a variation in costs above what would be expected or that can be explained through local differences. This adds to concerns regarding the overall quality and representativeness of the cost information received through the exercise.

**Challenge of isolating costs to local authority eligible support or care in scope**

It needs be recognised that care homes often provide a mix of support across a broad range of support types and complexity of need. This includes homes who also provide more specialist provision, where services and staffing ratios can be significantly above what is usually required within the four categories identified for the fair cost of care exercise.

It has not always been possible for providers to separately identify, accurately assign or exclude such costs and the additionality. Therefore, for homes who also provide more specialist provision, there is risk that the comparison of reported costs against the fees required from local authorities across the four care categories, are overstated.

Often more specialist provision, including one-to-one support, is paid separately and in addition to usual fees.

Ends

**Appendix A**

**Data Items Guidance for Provider**

See attached document

**Suite of questions requiring responses from Care Home providers**

See attached spreadsheet

**Appendix B – Result of Care Home Fair Cost of Care Exercise**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Cost of care exercise results - all cells should be £ per resident per week, MEDIANS.** | **65+ care home places without nursing** | **65+ care home places without nursing, enhanced needs** | **65+ care home places with nursing** | **65+ care home places with nursing, enhanced needs** |
| **Total Care Home Staffing** | **£474.77** | **£490.31** | **£715.94** | **£783.04** |
| Nursing Staff | £0.00 | £0.00 | £238.95 | £238.95 |
| Care Staff | £305.16 | £320.70 | £307.38 | £374.49 |
| Therapy Staff (Occupational & Physio) | £0.87 | £0.87 | £0.87 | £0.87 |
| Activity Coordinators | £8.44 | £8.44 | £8.44 | £8.44 |
| Service Management (Registered Manager/Deputy) | £35.43 | £35.43 | £35.43 | £35.43 |
| Reception & Admin staff at the home | £22.69 | £22.69 | £22.69 | £22.69 |
| Chefs / Cooks | £23.93 | £23.93 | £23.93 | £23.93 |
| Domestic staff (cleaning, laundry & kitchen) | £63.99 | £63.99 | £63.99 | £63.99 |
| Maintenance & Gardening | £9.01 | £9.01 | £9.01 | £9.01 |
| Other care home staffing (please specify) | £5.26 | £5.26 | £5.26 | £5.26 |
| **Total Care Home Premises** | **£43.84** | **£43.84** | **£43.84** | **£43.84** |
| Fixtures & fittings | £11.17 | £11.17 | £11.17 | £11.17 |
| Repairs and maintenance | £22.38 | £22.38 | £22.38 | £22.38 |
| Furniture, furnishings and equipment | £7.85 | £7.85 | £7.85 | £7.85 |
| Other care home premises costs (please specify) | £2.44 | £2.44 | £2.44 | £2.44 |
| **Total Care Home Supplies and Services** | **£116.44** | **£116.44** | **£116.44** | **£116.44** |
| Food supplies | £33.90 | £33.90 | £33.90 | £33.90 |
| Domestic and cleaning supplies | £8.85 | £8.85 | £8.85 | £8.85 |
| Medical supplies (excluding PPE) | £4.04 | £4.04 | £4.04 | £4.04 |
| PPE | £2.77 | £2.77 | £2.77 | £2.77 |
| Office supplies (home specific) | £3.57 | £3.57 | £3.57 | £3.57 |
| Insurance (all risks) | £5.85 | £5.85 | £5.85 | £5.85 |
| Registration fees | £3.88 | £3.88 | £3.88 | £3.88 |
| Telephone & internet | £1.67 | £1.67 | £1.67 | £1.67 |
| Council tax / rates | £1.01 | £1.01 | £1.01 | £1.01 |
| Electricity, Gas & Water | £34.68 | £34.68 | £34.68 | £34.68 |
| Trade and clinical waste | £4.77 | £4.77 | £4.77 | £4.77 |
| Transport & Activities | £1.41 | £1.41 | £1.41 | £1.41 |
| Other care home supplies and services costs (please specify) | £10.06 | £10.06 | £10.06 | £10.06 |
| **Total Head Office** | **£49.12** | **£49.12** | **£49.12** | **£49.12** |
| Central / Regional Management | £27.46 | £27.46 | £27.46 | £27.46 |
| Support Services (finance / HR / legal / marketing etc.) | £8.68 | £8.68 | £8.68 | £8.68 |
| Recruitment, Training & Vetting (incl. DBS checks) | £2.72 | £2.72 | £2.72 | £2.72 |
| Other head office costs (please specify) | £10.26 | £10.26 | £10.26 | £10.26 |
| **Total Return on Operations** | **£34.21** | **£34.99** | **£46.27** | **£49.62** |
| **Total Return on Capital** | **£57.10** | **£57.10** | **£57.10** | **£57.10** |
| **TOTAL** | **£775.48** | **£791.80** | **£1,028.71** | **£1,099.17** |

**Appendix C**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Lower Quartile** | | | | |
| **Cost of care exercise results - all cells should be £ per resident per week** | **65+ care home places without nursing** | **65+ care home places without nursing, enhanced needs** | **65+ care home places with nursing** | **65+ care home places with nursing, enhanced needs** |
| **Total Care Home Staffing** | **£413.45** | **£437.81** | **£596.95** | **£661.04** |
| **Nursing Staff** | £0.00 | £0.00 | £167.68 | £186.35 |
| **Care Staff** | £279.69 | £304.05 | £295.51 | £340.93 |
| **Therapy Staff (Occupational & Physio)** | £8.71 | £8.71 | £8.71 | £8.71 |
| **Activity Coordinators** | £6.70 | £6.70 | £6.70 | £6.70 |
| **Service Management (Registered Manager/Deputy)** | £29.01 | £29.01 | £29.01 | £29.01 |
| **Reception & Admin staff at the home** | £8.90 | £8.90 | £8.90 | £8.90 |
| **Chefs / Cooks** | £22.69 | £22.69 | £22.69 | £22.69 |
| **Domestic staff (cleaning, laundry & kitchen)** | £45.18 | £45.18 | £45.18 | £45.18 |
| **Maintenance & Gardening** | £7.31 | £7.31 | £7.31 | £7.31 |
| **Other care home staffing (please specify)** | £5.26 | £5.26 | £5.26 | £5.26 |
| **Total Care Home Premises** | **£30.88** | **£30.88** | **£30.88** | **£30.88** |
| **Fixtures & fittings** | £6.69 | £6.69 | £6.69 | £6.69 |
| **Repairs and maintenance** | £16.89 | £16.89 | £16.89 | £16.89 |
| **Furniture, furnishings and equipment** | £5.76 | £5.76 | £5.76 | £5.76 |
| **Other care home premises costs (please specify)** | £1.55 | £1.55 | £1.55 | £1.55 |
| **Total Care Home Supplies and Services** | **£92.86** | **£92.86** | **£92.86** | **£92.86** |
| **Food supplies** | £29.63 | £29.63 | £29.63 | £29.63 |
| **Domestic and cleaning supplies** | £6.53 | £6.53 | £6.53 | £6.53 |
| **Medical supplies (excluding PPE)** | £2.78 | £2.78 | £2.78 | £2.78 |
| **PPE** | £2.33 | £2.33 | £2.33 | £2.33 |
| **Office supplies (home specific)** | £2.43 | £2.43 | £2.43 | £2.43 |
| **Insurance (all risks)** | £4.87 | £4.87 | £4.87 | £4.87 |
| **Registration fees** | £3.31 | £3.31 | £3.31 | £3.31 |
| **Telephone & internet** | £0.95 | £0.95 | £0.95 | £0.95 |
| **Council tax / rates** | £0.81 | £0.81 | £0.81 | £0.81 |
| **Electricity, Gas & Water** | £31.91 | £31.91 | £31.91 | £31.91 |
| **Trade and clinical waste** | £3.00 | £3.00 | £3.00 | £3.00 |
| **Transport & Activities** | £0.43 | £0.43 | £0.43 | £0.43 |
| **Other care home supplies and services costs (please specify)** | £3.90 | £3.90 | £3.90 | £3.90 |
| **Total Head Office** | **£35.31** | **£35.31** | **£35.31** | **£35.31** |
| **Central / Regional Management** | £22.96 | £22.96 | £22.96 | £22.96 |
| **Support Services (finance / HR / legal / marketing etc.)** | £3.42 | £3.42 | £3.42 | £3.42 |
| **Recruitment, Training & Vetting (incl. DBS checks)** | £1.03 | £1.03 | £1.03 | £1.03 |
| **Other head office costs (please specify)** | £7.91 | £7.91 | £7.91 | £7.91 |
| **Total Return on Operations** | **£28.63** | **£29.84** | **£37.80** | **£41.00** |
| **Total Return on Capital** | **£38.59** | **£38.59** | **£38.59** | **£38.59** |
| **TOTAL** | **£639.71** | **£665.29** | **£832.39** | **£899.68** |

**Appendix C- Continued**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Upper Quartile** | | | | |
| **Cost of care exercise results - all cells should be £ per resident per week** | **65+ care home places without nursing** | **65+ care home places without nursing, enhanced needs** | **65+ care home places with nursing** | **65+ care home places with nursing, enhanced needs** |
| **Total Care Home Staffing** | **£665.97** | **£711.49** | **£865.70** | **£939.55** |
| **Nursing Staff** | £0.00 | £0.00 | £229.70 | £229.70 |
| **Care Staff** | £364.16 | £409.67 | £334.19 | £408.04 |
| **Therapy Staff (Occupational & Physio)** | £24.39 | £24.39 | £24.39 | £24.39 |
| **Activity Coordinators** | £14.42 | £14.42 | £14.42 | £14.42 |
| **Service Management (Registered Manager/Deputy)** | £46.30 | £46.30 | £46.30 | £46.30 |
| **Reception & Admin staff at the home** | £41.98 | £41.98 | £41.98 | £41.98 |
| **Chefs / Cooks** | £33.65 | £33.65 | £33.65 | £33.65 |
| **Domestic staff (cleaning, laundry & kitchen)** | £79.10 | £79.10 | £79.10 | £79.10 |
| **Maintenance & Gardening** | £14.26 | £14.26 | £14.26 | £14.26 |
| **Other care home staffing (please specify)** | £47.73 | £47.73 | £47.73 | £47.73 |
| **Total Care Home Premises** | **£66.88** | **£66.88** | **£66.88** | **£66.88** |
| **Fixtures & fittings** | £23.77 | £23.77 | £23.77 | £23.77 |
| **Repairs and maintenance** | £25.46 | £25.46 | £25.46 | £25.46 |
| **Furniture, furnishings and equipment** | £11.95 | £11.95 | £11.95 | £11.95 |
| **Other care home premises costs (please specify)** | £5.71 | £5.71 | £5.71 | £5.71 |
| **Total Care Home Supplies and Services** | **£153.53** | **£153.53** | **£153.53** | **£153.53** |
| **Food supplies** | £44.77 | £44.77 | £44.77 | £44.77 |
| **Domestic and cleaning supplies** | £12.89 | £12.89 | £12.89 | £12.89 |
| **Medical supplies (excluding PPE)** | £4.54 | £4.54 | £4.54 | £4.54 |
| **PPE** | £4.66 | £4.66 | £4.66 | £4.66 |
| **Office supplies (home specific)** | £3.96 | £3.96 | £3.96 | £3.96 |
| **Insurance (all risks)** | £6.72 | £6.72 | £6.72 | £6.72 |
| **Registration fees** | £4.55 | £4.55 | £4.55 | £4.55 |
| **Telephone & internet** | £3.02 | £3.02 | £3.02 | £3.02 |
| **Council tax / rates** | £1.21 | £1.21 | £1.21 | £1.21 |
| **Electricity, Gas & Water** | £45.21 | £45.21 | £45.21 | £45.21 |
| **Trade and clinical waste** | £7.44 | £7.44 | £7.44 | £7.44 |
| **Transport & Activities** | £2.19 | £2.19 | £2.19 | £2.19 |
| **Other care home supplies and services costs (please specify)** | £12.37 | £12.37 | £12.37 | £12.37 |
| **Total Head Office** | **£91.97** | **£91.97** | **£91.97** | **£91.97** |
| **Central / Regional Management** | £35.10 | £35.10 | £35.10 | £35.10 |
| **Support Services (finance / HR / legal / marketing etc.)** | £33.79 | £33.79 | £33.79 | £33.79 |
| **Recruitment, Training & Vetting (incl. DBS checks)** | £3.93 | £3.93 | £3.93 | £3.93 |
| **Other head office costs (please specify)** | £19.15 | £19.15 | £19.15 | £19.15 |
| **Total Return on Operations** | **£48.92** | **£51.19** | **£58.90** | **£62.60** |
| **Total Return on Capital** | **£68.56** | **£68.56** | **£68.56** | **£68.56** |
| **TOTAL** | **£1,095.83** | **£1,143.62** | **£1,305.54** | **£1,383.08** |

**Appendix D – Count Response**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Care Home - Count Response** | | | | |
|  | **65+ care home places without nursing** | **65+ care home places without nursing, enhanced needs** | **65+ care home places with nursing** | **65+ care home places with nursing, enhanced needs** |
|  |  |  |  |  |
| **Nursing Staff** | 0 | 0 | 3 | 2 |
| **Care Staff** | 10 | 6 | 3 | 3 |
| **Therapy Staff (Occupational & Physio)** | 2 | 0 | 0 | 0 |
| **Activity Coordinators** | 1 | 4 | 1 | 2 |
| **Service Management (Registered Manager/Deputy)** | 3 | 4 | 1 | 2 |
| **Reception & Admin staff at the home** | 3 | 4 | 1 | 2 |
| **Chefs / Cooks** | 2 | 3 | 1 | 2 |
| **Domestic staff (cleaning, laundry & kitchen)** | 3 | 3 | 1 | 2 |
| **Maintenance & Gardening** | 3 | 3 | 1 | 2 |
| **Other care home staffing (please specify)** | 2 | 1 | 0 | 2 |
| **Total Care Home Premises** |  |  |  |  |
| **Fixtures & fittings** | 3 | 3 | 1 | 1 |
| **Repairs and maintenance** | 3 | 4 | 1 | 2 |
| **Furniture, furnishings and equipment** | 2 | 3 | 1 | 2 |
| **Other care home premises costs (please specify)** | 2 | 3 | 1 | 2 |
|  |  |  |  |  |
| **Food supplies** | 3 | 4 | 1 | 2 |
| **Domestic and cleaning supplies** | 3 | 4 | 1 | 2 |
| **Medical supplies (excluding PPE)** | 1 | 4 | 1 | 1 |
| **PPE** | 2 | 2 | 0 | 1 |
| **Office supplies (home specific)** | 3 | 4 | 1 | 2 |
| **Insurance (all risks)** | 3 | 4 | 1 | 2 |
| **Registration fees** | 3 | 4 | 1 | 2 |
| **Telephone & internet** | 3 | 4 | 1 | 2 |
| **Council tax / rates** | 3 | 3 | 1 | 2 |
| **Electricity, Gas & Water** | 3 | 4 | 1 | 2 |
| **Trade and clinical waste** | 3 | 4 | 1 | 2 |
| **Transport & Activities** | 3 | 4 | 1 | 2 |
| **Other care home supplies and services costs (please specify)** | 2 | 4 | 1 | 2 |
| **Total Head Office** |  |  |  |  |
| **Central / Regional Management** | 2 | 4 | 1 | 1 |
| **Support Services (finance / HR / legal / marketing etc.)** | 3 | 4 | 1 | 2 |
| **Recruitment, Training & Vetting (incl. DBS checks)** | 3 | 4 | 1 | 2 |
| **Other head office costs (please specify)** | 1 | 1 | 1 | 1 |
| **Total Return on Operations** | 3 | 4 | 1 | 2 |
| **Total Return on Capital** | 3 | 4 | 1 | 2 |

1. A free online tool provided by CareCubed was commissioned by the Care and Health Improvement Programme (CHIP)and for use by Care Home Providers and Local Authorities in England to input, share and collate data for the DHSC Cost of Care Exercise for 65+ Care Homes. [↑](#footnote-ref-1)
2. A free online tool provided by CareCubed was commissioned by the Care and Health Improvement Programme (CHIP)and for use by Care Home Providers and Local Authorities in England to input, share and collate data for the DHSC Cost of Care Exercise for 65+ Care Homes. [↑](#footnote-ref-2)
3. Medians represent the middle value when a distribution (e.g. Provider submitted expenditure lines) is ordered by size. The advantage of medians compared to averages is that they are less skewed by high outlier values. The data collected through the cost of care exercise is required to be reported as medians to account for outliers in the distributions that are being analysed. [↑](#footnote-ref-3)
4. Capturing the lower quartile and upper quartile costs reflects that there are a range of local costs. The median figure enables transparency and assurance that fee rates are moving towards the fair cost of care. [↑](#footnote-ref-4)
5. The Care home with Nursing Fair Cost of Care Estimates **have not** been adjusted to exclude the Funded Nursing Care (£209.19) [↑](#footnote-ref-5)
6. The Care home with Nursing Fair Cost of Care Estimates **have not** been adjusted to exclude the Funded Nursing Care (£209.19) [↑](#footnote-ref-6)
7. Investment by nature involves risk, the rate of return on capital is the % return that investors require to invest in a business. Within the care home market, return on capital payments within the care fee encourage new investors to invest in care home land and buildings, and keep existing capital invested in social care rather than investing in another business with similar risk. They may cover payments such as rent and mortgages. They are an important consideration for the full economic cost of running a care home, however, return on capital is not a hard entitlement.  [↑](#footnote-ref-7)
8. [www.livingwage.org.uk](http://www.livingwage.org.uk) [↑](#footnote-ref-8)
9. [Consumer Price Index including owner occupied housing (CPIH)](https://www.ons.gov.uk/economy/inflationandpriceindices/timeseries/l55o/mm23). This owner-occupied housing CPI variant is relevant because some care home costs are similar to housing costs. [↑](#footnote-ref-9)