

Senate Inquiry: Support at Home Program



Submission

July 2026



NATSIAACC

National Aboriginal and Torres Strait Islander
Ageing and Aged Care Council

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Acknowledgment of Country

NATSIAACC acknowledges the Traditional Owners and Custodians of the lands, waters and skies on which we live, work and gather, and of Country throughout Australia. We acknowledge that sovereignty was never ceded and affirm the rights of Aboriginal and Torres Strait Islander Peoples to self-determination.

We pay our deepest respects to Elders past and present. We honour Elders and Older People as the custodians of culture, knowledge and community, whose wisdom continues to guide and strengthen future generations.

As the national First Nations peak for Aboriginal and Torres Strait Islander Ageing and Aged Care, we are committed to supporting Elders and Older People to age with dignity, connection and choice.

This always was, and always will be, Aboriginal Land.

National Aboriginal and Torres Strait Islander Ageing and Aged Care Council

About

The National Aboriginal and Torres Strait Islander Ageing and Aged Care Council (NATSIAACC) is the national peak body for Aboriginal and Torres Strait Islander Ageing and Aged Care. As the national representative peak, NATSIAACC provides national leadership, policy expertise and advice to governments, while representing the interests and perspectives of Aboriginal and Torres Strait Islander Elders, Older People, providers and the broader Ageing and Aged Care sector. NATSIAACC works to ensure that Aboriginal and Torres Strait Islander Elders and Older People can access support and care that is culturally safe, trauma aware and healing-informed, and recognises the importance of their personal connections to community, Country or Island Home.

NATSIAACC is building a membership base of:

- Aboriginal and Torres Strait Islander community-controlled providers of Ageing and Aged Care, and
- Entities with an interest in culturally appropriate Ageing and Aged Care services.

NATSIAACC's founding Directors are all leaders in Aboriginal and Torres Strait Islander Ageing and Aged Care provision.

Our Vision

All Aboriginal and Torres Strait Islander people are thriving, healthy, strong, with ongoing cultural connections in their older years.

Our Purpose

NATSIAACC supports Aboriginal and Torres Strait Islander older peoples, their families, and communities to identify, engage in, advocate for, and lead systemic reform to embed culturally safe practices across the Aged Care and ageing sector.

With thanks

NATSIAACC thanks its members, stakeholders, and other peak bodies for their valuable contributions to this submission and for generously giving their time to support older Aboriginal and Torres Strait Islander people.

Funding

NATSIAACC is funded by the Commonwealth Department of Health, Disability and Ageing (the Department). NATSIAACC has been in operation since 2022. In the context of the current Aged Care reforms and the need for extensive advocacy, input, and leadership in the sector, it will be necessary to provide additional funding to support NATSIAACC to provide the input and engagement required to ensure that the reforms deliver much needed support to Aboriginal and Torres Strait Islander Elders and Older People.

NATSIAACC Recommendations

NATSIAACC makes the following recommendations to assist the Community Affairs References Committee and the Australian Government in strengthening the Support at Home Program. Together, these recommendations provide practical, evidence-based solutions to better align the Program with the intent of the Aged Care Act 2024 and improve outcomes for Aboriginal and Torres Strait Islander Elders and Older People.

NATSIAACC recommends the following priority actions in response to the Terms of Reference.

- a) The ability for older Australians to access services to live safely and with dignity at home. To better support Aboriginal and Torres Strait Islander Elders and Older People to age well and live safely and with dignity at home, the Australian Government should:**

Recommendation 1

Recognise and fund the additional time and activities required to deliver culturally safe Aged Care, acknowledging that building and maintaining trusted relationships, engaging with families and communities, responding to cultural obligations, and supporting connection to culture, community and Country or Island Home are fundamental components of care for Aboriginal and Torres Strait Islander Elders and Older People.

Recommendation 2

Amend the Integrated Assessment Tool (IAT) to include mandatory assessment domains for trauma, healing, connection to Country or Island Home, cultural obligations, kinship responsibilities and cultural safety, and require these factors to inform funding decisions and care planning.

Recommendation 3

Amend the Support at Home Service List to allow approved providers to fund essential household items where an assessment demonstrates they are necessary to maintain an Aboriginal and Torres Strait Islander Elder or Older Person's health, nutrition, independence and ability to remain at home.

Recommendation 4

Amend Support at Home claiming arrangements to reimburse providers for urgent services delivered prior to funding approval where delaying care would increase the risk of injury, hospitalisation or premature entry into Residential Aged Care.

- b) the impact of the co-payment contributions for independent services and everyday living services on the financial security and wellbeing of older Australians;**

In order to minimise the impact of co-payment contributions on the financial security and wellbeing of Aboriginal and Torres Strait Islander Elders and Older People, the Australian Government should:

Recommendation 5

Exempt all Aboriginal and Torres Strait Islander Elders and Older People from Support at Home co-contributions.

Recommendation 6

Exempt Aboriginal and Torres Strait Islander Elders and Older People who receive a pension or other government income support from Support at Home co-contributions.

Recommendation 7

Exempt Social Support and Community Engagement services within the Independence category of the Support at Home Service List from co-contribution requirements.

Recommendation 8

Transfer responsibility for calculating, collecting and recovering Support at Home co-contributions from approved providers to Services Australia, ensuring that any co-contribution processes are culturally safe, proportionate and designed to avoid creating barriers that discourage Aboriginal and Torres Strait Islander Elders and Older People from accessing or remaining engaged with Aged Care services.

c) trends and impact of pricing mechanisms on consumers;

In order to minimise the impact of current pricing mechanisms on Aboriginal and Torres Strait Islander Elders and Older People, the Australian Government should:

Recommendation 9

Revise Support at Home pricing to adequately fund the actual costs of culturally safe care management, care coordination and culturally safe models of care delivered by Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers.

Recommendation 10

Introduce a temporary transition loading that recognises the additional care management and administrative requirements associated with transitioning clients into Support at Home.

d) the adequacy of the financial hardship assistance for older Australians facing financial difficulty;

In order to improve the adequacy of financial hardship assistance for Aboriginal and Torres Strait Islander Elders and Older People facing financial difficulty when entering the Aged Care system, the Australian Government should:

Recommendation 11

Instruct Services Australia to use existing Commonwealth income and pension data to automatically determine eligibility for, and grant, Aged Care financial hardship assistance to all Aboriginal and Torres Strait Islander Age Pension recipients, including those receiving Commonwealth Rent Assistance, without requiring a separate hardship application.

Recommendation 12

Fund and expand the remit of the Elder Care Support Program to enable Elder Care Support workers to assist Aboriginal and Torres Strait Islander Elders, Older People, carers and their families to navigate, complete, submit and follow up Aged Care financial hardship applications.

Recommendation 13

Review and amend the current financial hardship asset threshold to ensure it appropriately reflects the financial circumstances of Aboriginal and Torres Strait Islander Elders and Older People, including by excluding National Redress Scheme payments and State and Territory Stolen Generations Redress Scheme payments from financial hardship asset assessments.

e) the impact on the residential aged care system, and hospitals;

In order to minimise the impact on the Residential Aged Care system and hospitals, the Australian Government should:

Recommendation 14

Invest in additional assessment and administrative capacity to accelerate the assessment, approval and allocation of Support at Home packages, reducing waitlists and ensuring older Australians receive timely access to care before their health deteriorates.

f) the impact on older Australians transitioning from the Home Care Packages Program;

In order to improve the transition of older Australians from the Home Care Packages Program, the Australian Government should:

Recommendation 15

Amend the Support at Home funding arrangements to provide approved providers with greater flexibility to utilise unspent quarterly rollover funds and remove unnecessary restrictions on accessing Assistive Technology and Home Modifications funding where those supports are necessary to maintain an Aboriginal and Torres Strait Islander Elder or Older Person's safety, independence and ability to remain at home.

Recommendation 16

Undertake a culturally specific review of transition outcomes for Aboriginal and Torres Strait Islander Elders and Older People within 12 months of entering Support at Home to identify any unintended reduction in access, flexibility or cultural safety.

g) thin markets including those affected by geographic remoteness and population size;

In order to improve access to Support at Home services in thin markets affected by geographic remoteness and population size, the Australian Government should:

Recommendation 17

Retain thin market grants and other supports and opportunities to uphold delivery of Aged Care services in regional, rural and remote areas.

Recommendation 18

Introduce dedicated workforce attraction and retention incentives for Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care Providers, including relocation assistance, workforce accommodation and remote employment incentives to support recruitment and retention in regional, rural and remote communities.

Recommendation 19

Review the value of Thin Market Grants to ensure funding more accurately reflects the operational costs and financial risks experienced by Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care Providers delivering Aged Care services in remote communities.

h) the impact on First Nations communities, and culturally and linguistically diverse communities; and

In order to improve the impact of Aged Care reforms on Aboriginal and Torres Strait Islander communities, the Australian Government should:

Recommendation 20

Establish formal, shared governance arrangements with NATSIAACC, the national peak body for Aboriginal and Torres Strait Islander Ageing and Aged Care, and the Aboriginal and Torres Strait Islander Ageing and Aged Care ecosystem to lead the design, implementation, monitoring and evaluation of reforms affecting Aboriginal and Torres Strait Islander Elders and Older People.

Recommendation 21

Operationalise the Cultural Safety in Aged Care Definition contained in the Explanatory Memorandum to the Aged Care Act 2024 by embedding cultural safety requirements throughout the Act, Support at Home operational guidelines, funding arrangements and pricing frameworks, ensuring providers are appropriately funded to deliver culturally safe care in practice.

Recommendation 22

Recognise and fund culturally safe, trauma-aware and healing-informed models of care as core services under the Support at Home Service List.

Executive Summary

For Aboriginal and Torres Strait Islander Elders and Older People, ageing well is about far more than remaining at home. It is about ageing with dignity and self-determination, while maintaining connection to family, culture, community and Country or Island Home. The success of the Support at Home Program should therefore be measured not only by the services it funds, but by whether it enables these outcomes.

Support at Home was announced as a once in a generation reform that would deliver person-centred care and help older people stay at home for longer. Its current design, rigid service lists, narrow assessment categories, transaction-priced subsidies and cost-shifting co-contributions, assumes every older Australian can thrive within a singular model. Yet for Aboriginal and Torres Strait Islander Elders and Older People, clinical tasks are only half the story. Ageing well with dignity is inseparable from culture, connection to Country or Island Home, kinship, community and self-determination.

Because Support at Home does not yet embed or fund those elements as core entitlements, it leaves this culturally essential work to be absorbed by families and Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers. Until the program explicitly finances and operationalises culturally safe, trauma-aware and healing-informed models of

care, this once in a generation reform will struggle to deliver the person-centred support it promises or keep Aboriginal and Torres Strait Islander Elders and Older People safely at home for longer. These are not additional considerations for Aboriginal and Torres Strait Islander Elders and Older People; they are the foundations of ageing well and should therefore be recognised as foundational elements of culturally safe Aged Care.

That disconnect sits uneasily beside the National Agreement on Closing the Gap, whose Priority Reforms call for genuine partnership with Aboriginal and Torres Strait Islander Peoples, a strengthened community-controlled sector and transformed mainstream institutions. It also departs from the Aboriginal and Torres Strait Islander Aged Care Framework 2025-2035, which requires culturally safe, trauma-aware, healing-informed care delivered through self-determination and funded on the true cost of trusted relationships, not the budgetary convenience of task-based minutes. Interim First Nations Aged Care Commissioner Andrea Kelly's national consultations confirmed overwhelming support for a system that recognises and funds the true cost of delivering culturally safe, trauma-aware and healing-informed care. The Royal Commission into Aged Care Quality and Safety reached the same conclusion, calling for flexible, trauma-informed, needs-based Aged Care wherever Aboriginal and Torres Strait Islander Elders and Older People live.

NATSIAACC supports the direction of reform. Our concern is that key implementation settings within the Support at Home Program do not yet fully reflect the commitments established through the Aged Care Act 2024, the Aboriginal and Torres Strait Islander Aged Care Framework 2025–2035 and the National Agreement on Closing the Gap.

Drawing on NATSIAACC's national engagement across the Aboriginal and Torres Strait Islander Ageing and Aged Care ecosystem, our members consistently report that implementation continues to fall short of the policy intent. The challenge is no longer establishing the vision for reform; it is ensuring that implementation delivers measurable outcomes for Aboriginal and Torres Strait Islander Elders and Older People.

NATSIAACC therefore submits that Support at Home must be reshaped so its operational settings match its published intent. Culturally safe, trauma-aware and healing-informed models of care must be recognised and funded; structural barriers created by assessment, funding and co-contribution arrangements must be removed; access to care must be strengthened through more flexible service delivery; and regional, rural and remote communities must be supported through appropriate workforce investment and thin-market funding.

Only by adopting these changes will Support at Home deliver on its promise and meet the standards set by Closing the Gap, the Aboriginal and Torres Strait Islander Aged Care Framework, the Interim Commissioner's report and the Royal Commission. Anything less will leave Aged Care falling short of its aim, keeping Elders and Older People living safely at home, through truly person-centred care.

Response to Terms of Reference

TOR A: The ability for older Australians to access services to live safely and with dignity at home

For Aboriginal and Torres Strait Islander Elders and Older People, accessing Aged Care is not simply about receiving services. It is about accessing support that enables them to continue living well, maintaining connection to family, culture, community and Country or Island Home, while exercising choice and self-determination throughout their ageing journey.

Introducing the Support at Home Program offers a substantial opportunity to improve how Aboriginal and Torres Strait Islander Elders and Older People access Aged Care. Nevertheless, meeting the objectives of the Aged Care Act 2024 involves far more than swapping one funding model for another. It calls for a program that puts the Act's principles into practice through culturally safe, trauma-aware, healing informed and person-centred care. In its current form, key components of the Support at Home Program remain insufficiently connected to these principles, which threatens to restrict the very outcomes the reform is designed to deliver.

Andrea Kelly's Transforming Aged Care for Aboriginal and Torres Strait Islander People report concluded that meaningful reform depends on embedding Aboriginal and Torres Strait Islander ways of knowing, being and doing across the Aged Care system. In parallel, the Aboriginal and Torres Strait Islander Aged Care Framework 2025-2035 commits Government to an Aged Care system that is culturally safe, trauma-aware and healing-informed, and co-designed with Aboriginal and Torres Strait Islander People. Together, these reforms are meant to support the National Agreement on Closing the Gap by changing how Government designs and delivers services, rather than requiring Aboriginal and Torres Strait Islander People to keep adapting to mainstream systems.

From an Aboriginal and Torres Strait Islander perspective, the question is not whether Elders and Older People can fit within the system, but whether the system reflects and supports the realities of Aboriginal and Torres Strait Islander ways of ageing, caring and living well.

Feedback collected through NATSIAACC's consultation indicates that the Support at Home Program has not yet fully met these commitments. Existing funding arrangements continue to undervalue culturally safe, trauma-aware and healing-informed models of care. Assessment processes do not consistently identify cultural determinants of wellbeing and inflexible service and claiming rules constrain providers' capacity to address practical needs before they develop into crises. These challenges are structural barriers that shape whether Aboriginal and Torres Strait Islander Elders and Older People can live safely, independently and with dignity in their homes and communities.

Resolving these issues is essential to achieving the intent of the Aged Care Act 2024, delivering the commitments under the Aboriginal and Torres Strait Islander Aged Care Framework, advancing the Priority Reforms under the National Agreement on Closing the Gap and realising the transformational vision articulated by Andrea Kelly. Without targeted changes to the Support at Home Program, there is a significant risk that Government's policy objectives will remain aspirational rather than being converted into measurable outcomes for Aboriginal and Torres Strait Islander Elders and Older People.

Through its national policy work, member engagement and ongoing advocacy, NATSIAACC has consistently heard that the greatest barriers are no longer the absence of policy intent, but the way reform is being implemented in practice.

To better align the Support at Home Program with the objectives of the Aged Care Act 2024, the framework and the government's commitments under the National Agreement on Closing the Gap, NATSIAACC recommends the following reforms:

NATSIAACC Recommendations

- Recognise and fund the additional time and activities required to deliver culturally safe Aged Care, acknowledging that building trust, maintaining ongoing relationships, engaging with families and communities, responding to cultural obligations, and supporting connection to culture, community and Country or Island Home are fundamental components of care for Aboriginal and Torres Strait Islander Elders and Older People.
- Amend the Integrated Assessment Tool (IAT) to include mandatory assessment domains relating to trauma, healing, connection to Country or Island Home, cultural obligations, kinship responsibilities and cultural safety, and require these factors to inform funding decisions and care planning.
- Amend the Support at Home Service List to allow approved providers to fund essential household items where an assessment demonstrates they are necessary to maintain an Aboriginal and or Torres Strait Islander Elder or Older Person's health, nutrition, independence and ability to remain at home.
- Amend Support at Home claiming arrangements to reimburse providers for urgent services delivered prior to funding approval where delaying care would increase the risk of injury, hospitalisation or premature entry into Residential Aged Care.

TOR B: The impact of the co-payment contributions for independent services and everyday living services on the financial security and wellbeing of older Australians

The introduction of mandatory co-contributions under the Support at Home Program represents one of the most significant barriers to equitable access to Aged Care created under the new Aged Care system. While the Australian Government has argued that co-contributions are necessary to support the long-term sustainability of Aged Care, NATSIAACC submits that the current policy has instead transferred financial pressure onto those least able to bear it and, in doing so, has undermined the very objectives the Aged Care Act 2024 was enacted to achieve.

The Act establishes a rights-based Aged Care system founded on dignity, respect, equity and cultural safety. Yet the co-contribution framework applies a uniform funding approach to a population that has never experienced uniform social, economic or health outcomes. Aboriginal and Torres Strait Islander Elders and Older People continue to experience disproportionately lower incomes, poorer health outcomes, higher levels of chronic disease, greater caring responsibilities and the enduring impacts of colonisation and intergenerational disadvantage. Expecting these communities to contribute financially on the same basis as the broader population is not equitable, it entrenches existing inequities that the Government has repeatedly committed to eliminating through Closing the Gap.

NATSIAACC rejects the proposition that access to essential Aged Care should depend upon an Elder and Older Person's capacity to pay. Every dollar spent on co-contributions is a dollar that is no longer available for food, electricity, fuel, medication or other essential household expenses. This burden falls most heavily on Aboriginal and Torres Strait Islander Elders and Older People who rely on government income supports, including the age pension, disability pension, parenting payments, Jobseeker and

other Commonwealth payments, many of whom already experience significant financial disadvantage. For these Elders and or Older People, co-contributions are not a modest user contribution; they represent a genuine barrier to accessing care. The inevitable consequence is that support is delayed, declined or reduced until health deteriorates, independence is lost and significantly more costly interventions become necessary. This is neither sound social policy nor sound economic policy.

However, for Aboriginal and Torres Strait Islander communities, the issue extends well beyond affordability. NATSIAACC continues to hear consistently from its members that the co-contribution system itself is culturally inappropriate and fundamentally inconsistent with the principles of community-controlled care. Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers have repeatedly advised that they did not establish services to invoice Elders and Older People, pursue outstanding debts or negotiate payment plans with the very people they exist to support. Community-controlled organisations exist because governments have historically failed Aboriginal and Torres Strait Islander Peoples. They were built on trust, reciprocity, cultural authority and the responsibility to care for Elders and Older People, not to recover Commonwealth revenue.

NATSIAACC members have been unequivocal that the current co-contribution framework is culturally unsafe. Providers have consistently reported that asking Elders and Older People for money is culturally wrong and directly conflicts with the values that underpin Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers. Many providers have described the current arrangements as placing them in an impossible position, either pursue payment from Elders and Older People and damage relationships that have taken decades to build or absorb the financial costs themselves and compromise the sustainability of their services.

The Commonwealth has effectively outsourced one of the most contentious elements of the Support at Home Program to providers, requiring Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers to act as debt collectors on behalf of Government. In doing so, the Government has transferred the financial, administrative and relational burden of its policy onto organisations that have consistently told the Department this approach is culturally inappropriate. NATSIAACC members and the Aboriginal and Torres Strait Islander Elders and Older People they represent, continue to advise that this system design is culturally unsafe. The Government cannot continue to claim cultural safety is a cornerstone of the Aged Care system while maintaining a funding model that Aboriginal and Torres Strait Islander communities themselves have identified as culturally unsafe.

NATSIAACC is equally concerned by the application of co-contributions to Social Support and Community Engagement services. The classification of these services as discretionary "independence" supports fundamentally misunderstands their purpose for Aboriginal and Torres Strait Islander Peoples. Connection to family, community, language, culture and Country or Island Home is not an optional lifestyle choice, it is central to social, emotional, spiritual and cultural wellbeing. These services reduce loneliness and isolation, strengthen cultural identity, support mental health and delay the need for higher-cost clinical interventions. Imposing financial barriers on services specifically designed to keep people healthy, connected and independent is inconsistent with both the preventative intent of the Support at Home Program and the Government's commitment to culturally safe Aged Care.

The current policy also ignores a fundamental practical reality. Where providers choose to absorb co-contributions in order to preserve culturally safe, trusting relationships with Aboriginal and Torres Strait Islander Elders and Older People, Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers bear the financial burden of a Commonwealth policy decision. Conversely, where providers seek to recover co-contributions, NATSIAACC continues to hear that Elders and Older People are delaying, declining or disengaging from essential services, or experiencing additional financial hardship. NATSIAACC has received consistent evidence from its members demonstrating that both of these outcomes are occurring in practice.

If the Australian Government intends to retain co-contributions, it cannot continue expecting approved providers to calculate, collect and recover Commonwealth charges from the very people they exist to support. This function should instead be undertaken by Services Australia, which already administers income support payments, conducts means testing and recovers government debts on behalf of the Commonwealth. There is no sound policy rationale for requiring Aged Care providers to perform functions that are more appropriately, efficiently and consistently undertaken by government. Any co-contributions arrangements administered by Services Australia must be culturally safe, proportionate and designed to support, rather than discourage, Aboriginal and Torres Strait Islander Elders and Older People to access and remain engaged with Aged Care services.

NATSIAACC emphasises that transferring responsibility to Services Australia is not the preferred policy outcome. The preferred position remains the exemption of Aboriginal and Torres Strait Islander Elders and Older People from Support at Home co-contributions. However, should the Government choose to retain co-contributions, transferring responsibility to Services Australia would represent a significantly more appropriate and culturally safe approach than requiring Aged Care providers to act as debt collectors on behalf of the Commonwealth.

Ultimately, the co-contribution framework does not simply create financial barriers; it undermines trust, weakens culturally safe care, threatens the sustainability of Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers and shifts the burden of Government policy onto the very communities the Aged Care Act 2024 was intended to support. A funding model that Aboriginal and Torres Strait Islander Aged Care providers consistently describe as culturally inappropriate and culturally unsafe cannot be reconciled with the Government's commitments under the Aged Care Act 2024, the National Agreement on Closing the Gap, or the Aboriginal and Torres Strait Islander Aged Care Framework. If the Government is serious about implementing its own reforms, the current co-contribution framework must be fundamentally reconsidered.

NATSIAACC's preferred policy position remains the exemption of all Aboriginal and Torres Strait Islander Elders and Older People from Support at Home co-contributions. However, should the Australian Government determine that a universal exemption is not adopted, NATSIAACC submits that, at a minimum, Aboriginal and Torres Strait Islander Elders and Older People who receive a pension or other government financial supports should be exempt from co-contributions to ensure that those least able to contribute are not discouraged from accessing essential Aged Care services.

To assist the Australian Government in rectifying these shortcomings and ensuring the Support at Home Program delivers on its stated objectives of equity, cultural safety and improved access to care for Aboriginal and Torres Strait Islander Elders and Older People, NATSIAACC makes the following recommendations:

NATSIAACC Recommendations

- Exempt all Aboriginal and Torres Strait Islander Elders and Older People from Support at Home co-contributions.
- Exempt all Aboriginal and Torres Strait Islander Elders and Older People who receive a pension or government financial supports from Support at Home co-contributions.
- Exempt Social Support and Community Engagement services within the Independence category of the Support at Home Service List from co-contribution requirements.
- Transfer responsibility for calculating, collecting and recovering Support at Home co-contributions from approved providers to Services Australia, ensuring that any co-contribution processes are culturally safe, proportionate and designed to avoid creating barriers that discourage Aboriginal and Torres Strait Islander Elders and Older People from accessing or remaining engaged with Aged Care services.

TOR C: Trends and impact of pricing mechanisms on consumers

The Support at Home pricing framework exposes one of the most significant contradictions within the Australian Government's Aged Care reform agenda. While the Government has repeatedly committed to embedding cultural safety, person-centred care and self-determination throughout the Aged Care system, it has retained a pricing methodology that funds a mainstream, transactional model of care rather than the culturally safe model of care it has committed to delivering.

The Royal Commission into Aged Care Quality and Safety concluded that Australia's Aged Care system required fundamental reform to place older people, their rights, dignity and individual needs at the centre of care. It further recognised that Aboriginal and Torres Strait Islander Peoples are entitled to receive support that is culturally respectful and safe and recognises the importance of connection to community and Country or Island Home. The Australian Government accepted these recommendations and committed to implementing a greater availability of culturally appropriate integrated models of care within a new rights-based Aged Care system through a new Aged Care Act.

Despite these commitments, the Support at Home pricing framework continues to fund activities as isolated service transactions rather than recognising the actual work required to deliver culturally safe Aged Care.

For Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers, culturally safe care cannot be measured solely by tasks completed or minutes delivered. Time spent building trust, engaging families, responding to cultural obligations and supporting connection to Country or Island Home is care; not an activity separate from care. These activities are the means through which culturally safe care is delivered, and Aboriginal and Torres Strait Islander Elders and Older People are supported to age well.

In practice, culturally safe care does not begin when a worker arrives at an Elder or Older Person's home and conclude when the service ends. It requires sustained investment in relationship-building, engagement with family and kinship networks, coordination across Aboriginal Community Controlled Health Organisations, Aboriginal and Torres Strait Islander Aged Care providers and local services, responding flexibly to Sorry Business and cultural obligations, cultural supervision of staff, unique care coordination and supporting Elders and Older People to maintain connection to culture, community and Country or Island Home. The Aboriginal and Torres Strait Islander Aged Care Framework recognises these principles as fundamental to achieving culturally safe Aged Care and improving outcomes for Aboriginal and Torres Strait Islander Elders and Older People.

Yet the current pricing methodology either inadequately funds or completely overlooks these activities.

The consequence is that Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers are expected to deliver the very model of care that successive governments have acknowledged is necessary, while absorbing many of the costs required to provide it. In effect, the Commonwealth has legislated cultural safety while expecting providers to subsidise its delivery.

At present there are elements within the current Support at Home pricing framework that fundamentally misunderstands what culturally safe Aged Care actually requires.

The Interim First Nations Aged Care Commissioner's report reinforces this conclusion. Following consultations with Aboriginal and Torres Strait Islander communities across Australia, the Commissioner concluded that the Aged Care system continues to fail Aboriginal and Torres Strait Islander People because it was never designed with them in mind and specifically highlighted the need for the future Support at Home model to fund "the real cost of providing that support" while supporting Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers to enter and grow within the sector. The Commissioner further concluded that

achieving equity requires funding arrangements that address systemic disadvantage rather than perpetuate it.

NATSIAACC continues to hear the same message from its members: Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers are delivering substantially more care minutes than the current pricing framework recognises.

Providers routinely undertake work that is essential to culturally safe care but is not adequately funded through pricing mechanisms like the 10% quarterly care management budget, including:

- care coordination across services and systems;
- relationship management with Elders, Older People, carers, families and kinship networks;
- family engagement and support for shared decision-making; and
- cultural support that enables care to be delivered safely, respectfully and in accordance with community expectations.

Every hour spent above the quarterly 10% cap to maintain trust, support family decision-making or coordinate culturally appropriate services is an unfunded investment by providers in achieving the Government's own reform objectives.

The Commonwealth cannot continue to promote Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers as the preferred model for delivering culturally safe Aged Care while simultaneously maintaining pricing mechanisms that fail to recognise the actual costs of that model.

NATSIAACC is equally concerned that current pricing arrangements fail to recognise the extraordinary workload imposed on providers through implementation of the Support at Home Program.

Providers have been required to redesign systems, revise care plans, educate clients and families, explain new funding arrangements, implement new digital systems and maintain continuity of care throughout one of the largest reforms in Australian Aged Care history. Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers have undertaken this work in a culturally safe manner through repeated engagement with Elders and Older People, their families and communities, often requiring considerably more time than mainstream providers because of the importance of trust, cultural safety and historical experiences with government systems.

Despite these significant additional responsibilities, no dedicated transition pricing mechanism adequately recognises these costs.

Once again, the Commonwealth has shifted the financial burden of implementing Government reform onto providers.

This approach directly contradicts the Aboriginal and Torres Strait Islander Aged Care Framework, which commits Government to prioritising Aboriginal Community Controlled Organisations and strengthening their participation within the Aged Care sector, as well as the National Agreement on Closing the Gap Priority Reforms that require governments to strengthen, not weaken, the community-controlled sector. A pricing framework that requires Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers to subsidise culturally safe care and absorb the implementation costs of Government reform does precisely the opposite.

Ultimately, the issue is not simply that Support at Home prices are insufficient. The issue is that pricing mechanisms have been designed around a model of care that the Australian Government itself has acknowledged is no longer fit for purpose. Until pricing mechanisms adequately recognise the actual costs of culturally safe care management, relationship-based service delivery and additional care coordination, Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers will continue to bear the Commonwealth's reform agenda and Aboriginal and

Torres Strait Islander Elders and Older People will continue to experience inequitable access to the culturally safe Aged Care they have repeatedly been promised.

Funding arrangements should recognise the true cost of delivering culturally safe care because doing so directly supports Aboriginal and Torres Strait Islander Elders and Older People to age well with dignity, maintaining connection to family, culture, community and Country or Island Home while remaining safely at home.

To assist the Australian Government in aligning the Support at Home pricing mechanisms with the Aged Care Act 2024, the Royal Commission into Aged Care Quality and Safety, the Aboriginal and Torres Strait Islander Aged Care Framework, the Interim First Nations Aged Care Commissioner's recommendations and the National Agreement on Closing the Gap, NATSIAACC makes the following recommendations:

NATSIAACC Recommendations

- Revise Support at Home pricing to adequately fund the actual costs of culturally safe care management, care coordination and culturally safe models of care delivered by Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers.
- Introduce a temporary transition loading that recognises the additional care management and administrative requirements associated with transitioning clients into Support at Home.

TOR D: The adequacy of the financial hardship assistance for older Australians facing financial difficulty

No Aboriginal and Torres Strait Islander Elders and Older People should miss out on essential Aged Care because Government systems are unnecessarily complex to navigate. Access to care should be determined by need; not by an individual's ability to navigate administrative processes.

NATSIAACC submits that the current financial hardship arrangements under the Support at Home Program are fundamentally inadequate for Aboriginal and Torres Strait Islander Elders and Older People because the system has been designed around administrative convenience rather than equitable access.

Financial hardship assistance should exist to remove barriers to care, that is its intended objective as NATSIAACC understands. Instead, the current arrangements create additional barriers for the very people the policy is intended to support.

The current process assumes that older people experiencing financial hardship have the knowledge, confidence, literacy, digital capability and administrative capacity to identify that hardship assistance exists, understand the eligibility requirements, complete a separate application process, provide supporting evidence and navigate Commonwealth administrative processes. For many Aboriginal and Torres Strait Islander Elders and Older People, these assumptions bear little resemblance to reality on the ground, in communities.

The Royal Commission repeatedly identified complexity as a significant barrier to accessing Aged Care and recommended a system that is rights-based, equitable and centred on older people's needs rather than administrative processes. The Australian Government accepted these recommendations in their response to the final report of the Royal Commission into Aged Care quality and safety and committed to delivering a simpler, more accessible Aged Care system through a new Aged Care Act.

Yet the current financial hardship process achieves precisely the opposite.

Rather than proactively identifying people experiencing financial hardship, the Commonwealth requires older Aboriginal and Torres Strait Islander People to demonstrate hardship through an additional application process despite already holding much of the information necessary to determine eligibility.

NATSIAACC considers this to be an unnecessary and avoidable administrative burden.

Services Australia already administers the Age Pension, Commonwealth Rent Assistance and other income support payments. It already undertakes income testing, assesses financial circumstances and maintains current financial information for millions of Australians. There is no compelling policy justification for requiring Aboriginal and Torres Strait Islander Elders and Older People to submit a separate hardship application simply to prove information that another Commonwealth agency already holds.

The issue is not whether Government has sufficient information. The issue is that Government has chosen not to use it.

The result is a system that places the administrative burden of Government on older people, their providers and supporters rather than placing the administrative responsibility on Government itself.

NATSIAACC submits that financial hardship assistance should operate as an entitlement wherever eligibility can reasonably be established using existing Commonwealth data holdings. An Aboriginal or Torres Strait Islander Elder or Older Person receiving the Age Pension has already demonstrated financial need through Commonwealth assessment processes. Requiring that person to complete an additional hardship application serves no public interest, creates unnecessary delay, wastes more taxpayer funds on additional red tape and administrative burden and risks discouraging people from accessing essential Aged Care.

For those who are required to navigate the hardship process, the barriers are equally significant. NATSIAACC continues to hear from members that many Aboriginal and Torres Strait Islander Elders and Older People require extensive support simply to understand the Aged Care system, let alone complete complex administrative processes. Many rely on trusted Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers to explain Government correspondence, complete paperwork, liaise with Services Australia and advocate on their behalf. Without this support, many hardship applications would never be submitted.

The Elder Care Support Program has already demonstrated its value in assisting Aboriginal and Torres Strait Islander Elders and Older People to navigate the Aged Care system. However, its current remit does not extend to providing dedicated assistance with financial hardship applications despite this being one of the most significant administrative barriers facing older people.

NATSIAACC submits that if Government expects older people to continue navigating hardship processes, it must adequately resource trusted community-based organisations to support them. Further expanding and appropriately funding the Elder Care Support Program to include hardship assistance would improve access, reduce delays and ensure Aboriginal and Torres Strait Islander Elders and Older People are not excluded from financial assistance because of administrative complexity.

NATSIAACC is also concerned that the current financial hardship asset assessment fails to adequately recognise the unique circumstances of Aboriginal and Torres Strait Islander Peoples.

Current arrangements risk treating Stolen Generations redress payments as financial assets when assessing hardship eligibility. This approach fundamentally misunderstands the purpose of redress. Redress payments are not accumulated wealth. They are recognition by Australian governments that profound harm occurred through institutional abuse, forced child removal and discriminatory government policies. They exist as acknowledgement of injustice, not as financial resources intended to fund Aged Care.

To require an Elder and or Older Person to effectively exhaust compensation received for historical government wrongdoing before qualifying for financial hardship assistance undermines both the intent of redress schemes and the principles of restorative justice upon which they were established.

NATSIAACC submits that no Aboriginal and Torres Strait Islander Elder or Older Person should be financially disadvantaged within the Aged Care system because they received compensation acknowledging historical harm inflicted by governments.

The Aboriginal and Torres Strait Islander Aged Care Framework commits Government to delivering culturally safe, trauma-aware and healing-informed Aged Care, while recognising the ongoing impacts of intergenerational trauma and the importance of restoring trust in government systems. The former Interim First Nations Aged Care Commissioner similarly concluded that achieving equity requires addressing systemic barriers rather than expecting Aboriginal and Torres Strait Islander Peoples to navigate systems that were never designed for them.

The current financial hardship framework does neither. Rather than removing barriers, it creates new ones. Rather than recognising trauma, it compounds it. Rather than improving equitable access to care, it expects Aboriginal and Torres Strait Islander Elders and Older People to repeatedly prove disadvantage to a Commonwealth that already possesses the information necessary to assist them.

Financial hardship assistance should exist to ensure no older Australian is denied care because of financial circumstances. Under the current model, however, assistance too often depends not upon the existence of hardship, but upon an individual's ability to navigate a complex administrative process.

NATSIAACC acknowledges the Australian Government's decision earlier this year to exempt Stolen Generations Redress Scheme payments from Residential Aged Care asset testing. This was an important step towards recognising that compensation for historical trauma should not be treated as personal wealth within the Aged Care system. However, further reform is required to ensure the same principle applies across home care financial hardship arrangements. Stolen Generations survivors should not be disadvantaged by a system that counts redress payments as available assets, requires those payments to be used to meet Aged Care costs, or prevents Aboriginal and Torres Strait Islander Elders and Older People from accessing hardship assistance.

To assist the Australian Government in ensuring financial hardship assistance genuinely removes barriers to care and aligns with the intent of the Aged Care Act 2024, the Royal Commission into Aged Care Quality and Safety, the Aboriginal and Torres Strait Islander Aged Care Framework and the National Agreement on Closing the Gap, NATSIAACC makes the following recommendations:

NATSIAACC Recommendations

- Instruct Services Australia to use existing Commonwealth income and pension data to automatically determine eligibility for, and grant, Aged Care financial hardship assistance to all Aboriginal and Torres Strait Islander Age Pension recipients, including those receiving Commonwealth Rent Assistance, without requiring a separate hardship application.
- Fund and expand the remit of the Elder Care Support Program to enable Elder Care Support workers to assist Aboriginal and Torres Strait Islander Elders, Older People, carers and their families to navigate, complete, submit and follow up Aged Care financial hardship application
- Review and amend the current financial hardship asset threshold to ensure it appropriately reflects the financial circumstances of Aboriginal and Torres Strait Islander Elders and Older People, including by excluding National Redress Scheme payments and State and Territory Stolen Generations Redress Scheme payments from financial hardship asset assessments.

TOR E: The impact on the residential aged care system, and hospitals

Aboriginal and Torres Strait Islander Elders and Older People consistently tell NATSIAACC they want to remain living in their own homes and communities, connected to family, culture and Country or Island Home, for as long as possible. Timely access to support is fundamental to achieving this.

The Australian Government has consistently stated that the objective of the Support at Home Program is to support older Australians to remain living independently at home for longer, delaying or preventing unnecessary hospital admissions and premature entry into Residential Aged Care.

NATSIAACC strongly supports this objective. However, the current implementation of Support at Home is undermining the Government's own policy intentions.

The greatest pressure on hospitals and Residential Aged Care is not being created by insufficient provider capability or unwillingness to deliver services. It is being created by several things, chief among which are the delays within the Commonwealth's own assessment, approval and package allocation processes.

Older Australians cannot receive services that have not yet been approved. Nor can providers deliver care where funding has not yet been allocated.

For Aboriginal and Torres Strait Islander Elders and Older People, these delays are particularly significant. Many enter the Aged Care system with higher levels of chronic disease, disability and complex health needs, reflecting the cumulative impacts of longstanding health inequities and systemic disadvantage. Delays in accessing timely in-home supports therefore have more immediate and more serious consequences than they may for the broader Australian population.

When older people cannot access appropriate support at the point it is needed, their health inevitably deteriorates. Falls increase. Hospital presentations increase. Carer fatigue increases. Functional decline accelerates. Opportunities for early intervention are lost.

Ultimately, people who could have remained safely at home instead require hospital admission or permanent Residential Aged Care because support was not available when it mattered most. These outcomes are neither unavoidable nor clinically inevitable. They are, in many cases, the direct consequence of administrative delay. For Aboriginal and Torres Strait Islander Elders and Older People, timely access to culturally safe support is fundamental to ageing well at home and avoiding avoidable deterioration that also separated them from family, culture, community and Country or Island Home.

The Royal Commission repeatedly identified timely access to Aged Care as fundamental to supporting older Australians to maintain their independence and wellbeing. It recommended a rights-based system that provides equitable, timely access to services based on assessed need. The Australian

Government accepted these recommendations and committed to implementing a new Aged Care system centred on the rights, dignity and needs of older Australians.

Yet under Support at Home, many older Australians continue to experience extended periods between assessment, approval and package allocation. Latest Government data indicates the median wait time for ongoing Support at Home services is 347 days as of July 2026.

During this time, providers might be left with attempting to manage increasingly complex care needs without appropriate or any funding, families continue providing unsustainable levels of informal care and hospitals become the default provider of care that should have been delivered at home.

NATSIAACC is particularly concerned that the current assessment and allocation system disproportionately affects Aboriginal and Torres Strait Islander Elders and Older People living in regional, rural, remote and very remote communities, where opportunities for early intervention are already constrained. Delays compound existing inequities and increase the likelihood that people will experience avoidable health deterioration before receiving appropriate support.

The Aboriginal and Torres Strait Islander Aged Care Framework commits the Australian Government to improving culturally safe and responsive access to Aged Care while ensuring older Aboriginal and Torres Strait Islander people can remain connected to family, community and Country or Island Home as they age. These aspirations cannot be realised where access to care is delayed by avoidable administrative bottlenecks.

The former Interim First Nations Aged Care Commissioner Andrea Kelly similarly concluded that the Aged Care system continues to fail Aboriginal and Torres Strait Islander People because it does not respond quickly enough, equitably enough or flexibly enough to their needs. The Commissioner called for an equity-based approach that removes systemic barriers and ensures the real needs of Aboriginal and Torres Strait Islander People are met through timely access to appropriate supports.

NATSIAACC submits that increasing the availability of Support at Home packages alone will not resolve these issues, albeit a strong step in the right direction.

Unless sufficient assessment, approval and administrative capacity exists to rapidly move older Australians through the system, additional packages will continue to be delayed by the same bottlenecks that currently prevent timely access to care.

The Commonwealth cannot continue measuring success by announcing additional packages while older Australians remain waiting for assessments, approvals and allocations as their health deteriorates.

The true measure of success is not just in how many packages Government funds; It is how quickly those packages reach the people who need them.

Every unnecessary delay increases the likelihood that an older person will present to hospital, experience avoidable functional decline or enter Residential Aged Care earlier than would otherwise have been necessary.

These outcomes are distressing for older Australians and their families, and they also place avoidable pressure on the health and Aged Care systems. Timely investment in community-based care is far more cost-effective than allowing people's needs to escalate until hospital admission or Residential Aged Care becomes necessary. As outgoing Inspector-General of Aged Care Natalie Siegel-Brown observed in her recent address to the National Press Club, Residential Aged Care is by far the most expensive part of the Aged Care system, costing taxpayers around \$123,000 per person each year, compared with approximately \$30,000 to support someone to remain independent at home.

Investing in assessment and administrative capacity is therefore not simply an investment in Aged Care. It is an investment in reducing avoidable hospital admissions, delaying premature entry into Residential Aged Care and ensuring the Support at Home Program delivers the preventative outcomes it was specifically designed to achieve.

To assist the Australian Government in reducing pressure on hospitals and Residential Aged Care while ensuring older Australians receive timely access to the supports, they need to remain living independently at home, NATSIAACC makes the following recommendation:

NATSIAACC Recommendations

- Invest in additional assessment and administrative capacity to accelerate the assessment, approval and allocation of Support at Home packages, reducing waitlists and ensuring older Australians receive timely access to care before their health deteriorates.

TOR F: The impact on older Australians transitioning from the Home Care Packages Program

The transition from the Home Care Packages Program to the Support at Home Program should not simply be measured by whether participants were successfully transferred from one funding model to another. Rather, it should be measured by whether older Australians continue to receive timely, flexible and culturally safe care that enables them to remain living independently at home.

The measure of successful implementation should not simply be whether people transitioned to a new program, but whether Aboriginal and Torres Strait Islander Elders and Older People experience improved access, stronger cultural safety and better outcomes than under the previous system.

For many Aboriginal and Torres Strait Islander Elders and Older People, evidence provided to NATSIAACC suggests that aspects of the transition have unintentionally reduced the flexibility that providers previously relied upon to respond quickly to changing care needs.

NATSIAACC members consistently advised that one of the most significant challenges arising from the transition relates to the operation of participant funding and the ability to access low-cost Assistive Technology and Home Modifications when they are needed most.

Under the Support at Home Program, participants are able to carry forward the greater of \$1,000 or 10 per cent of their quarterly budget into the following quarter. NATSIAACC acknowledges that this policy is intended to encourage the appropriate utilisation of quarterly budgets and maintain the integrity of the funding model. However, providers consistently advised that the current rollover cap is frequently insufficient to respond to unexpected changes in an Elder or Older Person's health, mobility or living circumstances that arise late in a budget period.

Providers also raised concerns regarding the interaction between retained Home Care Package funds and the Support at Home funding arrangements. While participants transitioning from the Home Care Packages Program retain access to their historical unspent Home Care Package funds, providers advised that these funds must first be exhausted before participants can access additional Support at Home services or funding available through the Assistive Technology and Home Modifications Scheme. In practice, this sequencing requirement limits providers' ability to determine the most appropriate funding pathway based on an Elder and or Older Person's immediate clinical and functional needs.

Collectively, these arrangements reduce the flexibility that providers previously exercised under the Home Care Packages Program to deliver timely preventative interventions.

NATSIAACC members provided practical examples where relatively inexpensive supports, such as mobility aids, shower chairs, handrails and other minor home modifications, could not always be delivered as quickly as required because providers were required to work through multiple funding

arrangements before appropriate supports could be accessed. While individually low in cost, these interventions are often critical to preventing falls, maintaining independence and reducing avoidable presentations to hospitals or premature entry into Residential Aged Care.

The Royal Commission into Aged Care Quality and Safety emphasised that Aged Care should be responsive to people's changing needs and support older Australians to remain living safely and independently at home for as long as possible. The Australian Government accepted these principles and committed to a rights-based Aged Care system through the Aged Care Act 2024. NATSIAACC submits that transition arrangements should support these objectives rather than unintentionally delaying preventative care through unnecessary funding restrictions.

NATSIAACC is also concerned that, despite representing the most significant reform to in-home Aged Care in decades, there has been no commitment to undertake a culturally specific evaluation of how Aboriginal and Torres Strait Islander Elders and Older People have experienced the transition to Support at Home.

The Aboriginal and Torres Strait Islander Aged Care Framework recognises that genuine reform requires continuous partnership, accountability and evaluation to ensure policies improve outcomes for Aboriginal and Torres Strait Islander Peoples. Similarly, the former Interim First Nations Aged Care Commissioner concluded that Aged Care reforms must be evaluated against the lived experiences of Aboriginal and Torres Strait Islander peoples and continuously refined where unintended barriers emerge.

Without a dedicated review of transition outcomes, the Australian Government cannot confidently determine whether the Support at Home Program has maintained or improved access to services, preserved provider flexibility or strengthened culturally safe care for Aboriginal and Torres Strait Islander Elders and Older People.

NATSIAACC submits that the success of the transition should not be measured by implementation alone, but by whether Aboriginal and Torres Strait Islander Elders and Older People experience better access to care, greater flexibility and improved outcomes under the new program.

To assist the Australian Government in strengthening the transition from the Home Care Packages Program and ensuring the Support at Home Program delivers timely, flexible and culturally safe care for Aboriginal and Torres Strait Islander Elders and Older People, NATSIAACC makes the following recommendations:

NATSIAACC Recommendations

- Amend the Support at Home funding arrangements to provide approved providers with greater flexibility to utilise unspent quarterly rollover funds and remove unnecessary restrictions on accessing Assistive Technology and Home Modifications funding where those supports are necessary to maintain an Aboriginal and or Torres Strait Islander Elder or Older Person's safety, independence and ability to remain at home.
- Undertake a culturally specific review of transition outcomes for Aboriginal and Torres Strait Islander Elders and Older People within 12 months of entering Support at Home to identify any unintended reduction in access, flexibility or cultural safety.

TOR G: Thin markets including those affected by geographic remoteness and population size

NATSIAACC acknowledges the Australian Government's ongoing commitment to strengthening Aged Care service delivery in thin markets. Amongst the \$5.6 billion Aged Care reform package announced in 2024, the Australian Government committed \$900 million to improve access to Aged Care services in rural, regional, remote and specialised settings, recognising that providers operating in these markets face unique operational and financial challenges. This commitment has subsequently been implemented through the staged release of the Support at Home Thin Markets Grants Program, with approximately \$297 million awarded through Round 1, \$100 million through Round 2, and most recently, over \$311 million made available through Round 3.

NATSIAACC welcomes these investments as important steps towards strengthening the Aboriginal and Torres Strait Islander Ageing and Aged Care ecosystem. However, sustained implementation, monitoring and evaluation will determine whether these initiatives deliver meaningful outcomes for Elders and Older People.

NATSIAACC welcomes this continued investment. The progression of successive funding rounds demonstrates that the Australian Government recognises that providers operating in regional, rural and remote communities cannot always rely upon the same funding assumptions or economies of scale as providers operating in metropolitan areas. The continuation of dedicated funding to support service delivery in thin markets acknowledges the higher operating costs associated with travel, workforce shortages, infrastructure, service continuity and the delivery of care across vast geographic areas.

NATSIAACC also welcomes the inclusion of the Aboriginal and Torres Strait Islander Support at Home provider pilot within the Round 3 Thin Markets Grants Program. As the first initiative of its kind in Support at Home, the pilot represents an important opportunity to explore funding approaches that better reflect the operational realities of Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers delivering culturally safe Aged Care services. NATSIAACC considers this an important step towards ensuring future funding arrangements better recognise the unique challenges experienced by Aboriginal Community Controlled Organisations, Aboriginal and Torres Strait Islander Aged Care providers and those operating in thin markets.

While these initiatives represent a positive and welcome development, they have only recently commenced. It is therefore too early to determine whether the current level of investment, including the Aboriginal and Torres Strait Islander Support at Home provider pilot, will be sufficient to address the longstanding structural challenges associated with delivering Aged Care services within Aboriginal and Torres Strait Islander communities and those very same communities in regional, rural and remote locations. NATSIAACC considers that the implementation and evaluation of these initiatives will be critical in determining whether additional policy reform or future funding investment is required.

Notwithstanding this significant investment, NATSIAACC's engagement with members continues to demonstrate that providers operating in thin markets face considerable operational and financial pressures. Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers consistently identified higher workforce costs, difficulties attracting and retaining suitably qualified staff, extensive travel requirements, freight and transport costs, vehicle

maintenance, workforce accommodation and the inability to achieve economies of scale as ongoing challenges affecting service sustainability.

Unlike providers operating in metropolitan markets, Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers delivering Aged Care services in regional, rural and remote communities often incur substantial higher operating costs irrespective of participant numbers. These business conditions make it significantly more difficult to achieve long-term financial sustainability without additional government support. Members consistently advised that maintaining service continuity in these environments requires ongoing investment that reflects the realities of operating in geographically dispersed communities.

Accordingly, NATSIAACC welcomes the Australian Government's recognition of these challenges through the Thin Markets Grants Program and encourages the continuation of this policy approach beyond the current funding rounds. Continued investment in thin markets, alongside ongoing evaluation of existing initiatives, will be essential to strengthening provider capability, improving business sustainability and ensuring Aboriginal and Torres Strait Islander Elders and Older People living in regional, rural and remote communities continue to have equitable access to culturally safe Aged Care services.

To improve access to Support at Home services in thin markets affected by geographic remoteness and population size, NATSIAACC makes the following recommendations:

NATSIAACC Recommendations

- Retain future Thin Market Grants and other supports and opportunities that uphold the delivery of Aged Care services in regional, rural and remote communities.
- Introduce dedicated workforce attraction and retention incentives for Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers, including relocation assistance, workforce accommodation and remote employment incentives to support recruitment and retention in regional, rural and remote communities.
- Review the value of Thin Market Grants to ensure funding more accurately reflects the operational costs and financial risks experienced by Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers delivering Aged Care services in remote communities.

TOR H: The impact on First Nations communities, and culturally and linguistically diverse communities

The Australian Government has repeatedly committed to delivering an Aged Care system that is culturally safe, equitable and developed in genuine partnership with Aboriginal and Torres Strait Islander Peoples. These commitments are reflected throughout the Aged Care Act 2024, the Aboriginal and Torres Strait Islander Aged Care Framework 2025-2035, the Government's response to the Royal Commission into Aged Care Quality and Safety and the National Agreement on Closing the Gap.

As the national peak body for Aboriginal and Torres Strait Islander Ageing and Aged Care, NATSIAACC's role is not simply to respond to Government reforms, but to ensure those reforms are shaped, implemented, monitored and evaluated through an Aboriginal and Torres Strait Islander understanding of ageing, wellbeing and culturally safe care.

Despite these commitments, the evidence presented throughout this submission demonstrates that many barriers are continuing to be experienced by Aboriginal and Torres Strait Islander Elders and Older People. These barriers continue to reflect a more fundamental problem, that the Support at Home Program continues to be built upon a mainstream model of Aged Care, with Aboriginal and Torres Strait Islander considerations layered onto the system, rather than embedded throughout its design.

This submission has identified repeated examples of this disconnect. The current co-contribution framework fails to reflect the cultural realities of Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers. Pricing mechanisms still do not adequately fund culturally safe service delivery. Financial hardship arrangements continue to create unnecessary administrative barriers, while transition arrangements have reduced providers' flexibility to respond to changing care needs. Collectively, they demonstrate that Aboriginal and Torres Strait Islander perspectives have not been sufficiently embedded throughout the development and implementation of the Support at Home Program.

NATSIAACC submits that this is ultimately a failure of genuine co-design. Too often, Aboriginal and Torres Strait Islander organisations have been invited to comment on reforms after key policy decisions have already been made.

Consultation after policy development is not genuine co-design.

Meaningful partnership requires Aboriginal and Torres Strait Islander leadership throughout the design, implementation, monitoring and evaluation of reform. This is shared stewardship in practice and is essential to achieving measurable outcomes for Aboriginal and Torres Strait Islander Elders and Older People.

Seeking feedback on predetermined policy settings is not shared decision-making.

If Aboriginal and Torres Strait Islander Peoples are not involved in identifying the problems, designing the solutions, implementing the reforms and evaluating the outcomes, then the system will continue to produce mainstream solutions to Aboriginal and Torres Strait Islander challenges.

NATSIAACC is equally concerned that cultural safety continues to be recognised as a legislative principle but not operationalised through the systems that determine how care is funded and delivered.

The Australian Government cannot simultaneously state that cultural safety is fundamental to quality Aged Care while maintaining funding arrangements and pricing frameworks that fail to recognise the time, workforce and resources required to deliver culturally safe, trauma-aware and healing-informed care.

Cultural safety cannot simply be legislated. It must be funded.

Likewise, culturally safe, trauma-aware and healing-informed models of care cannot continue to be treated as an unfunded expectation placed upon Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers.

Building trust, supporting connection to family, community and Country or Island Home, engaging with kinship networks, responding to Sorry Business and delivering trauma-aware and healing-informed

care are not optional enhancements to Aged Care, they are fundamental components of culturally safe service delivery for Aboriginal and Torres Strait Islander Elders and Older People.

Until these activities are recognised as core services and funded accordingly, Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers will continue to subsidise Commonwealth policy through their own limited resources. However, this is not sustainable.

Nor is it consistent with the Australian Government's commitments under the Aged Care Act 2024, the Aboriginal and Torres Strait Islander Aged Care Framework, the Royal Commission into Aged Care Quality and Safety or the National Agreement on Closing the Gap.

To ensure the Support at Home Program genuinely delivers on the Australian Government's commitments to self-determination, cultural safety and equitable Aged Care outcomes for Aboriginal and Torres Strait Islander Peoples, NATSIAACC makes the following recommendations:

NATSIAACC Recommendations

- Establish formal, shared governance arrangements with NATSIAACC, the national peak body for Aboriginal and Torres Strait Islander Ageing and Aged Care, and the Aboriginal and Torres Strait Islander Ageing and Aged Care ecosystem to lead the design, implementation, monitoring and evaluation of reforms affecting Aboriginal and Torres Strait Islander Elders and Older People.
- Operationalise the Cultural Safety in Aged Care Definition contained in the Explanatory Memorandum to the Aged Care Act 2024 by embedding cultural safety requirements throughout the Act, Support at Home operational guidelines, funding arrangements and pricing frameworks, ensuring providers are appropriately funded to deliver culturally safe care in practice.
- Recognise and fund culturally safe, trauma-aware and healing-informed models of care as core services under the Support at Home Service List.

Conclusion

The evidence presented throughout this submission demonstrates that the principal challenge facing the Support at Home Program is not a lack of policy intent. The Australian Government has already articulated a clear reform agenda through the Aged Care Act 2024, the National Agreement on Closing the Gap, the Aboriginal and Torres Strait Islander Aged Care Framework 2025-2035, its response to the Royal Commission into Aged Care Quality and Safety, and the recommendations of the former Interim First Nations Aged Care Commissioner. Collectively, these reforms establish a consistent policy direction: an Aged Care system that is culturally safe, person-centred, equitable and developed in genuine partnership with Aboriginal and Torres Strait Islander Peoples.

The challenge identified throughout this submission is that the operational design of the Support at Home Program has not yet consistently translated those commitments into practice. While cultural safety has become a legislative principle, it has not been systematically embedded within pricing, assessment, funding, service delivery or implementation settings. As a consequence, Aboriginal Community Controlled Organisations and Aboriginal and Torres Strait Islander Aged Care providers continue to absorb the costs of delivering relationship-based, culturally safe and trauma-aware care, while Aboriginal and Torres Strait Islander Elders and Older People continue to encounter barriers that the broader reform agenda was intended to remove.

Importantly, the issues identified throughout this submission are interconnected consequences of a program that continues to reflect a predominantly mainstream service model. Whether considering co-contributions, pricing, financial hardship, transition arrangements, thin markets or assessment processes, a common theme emerges: the objectives of the reform are often stronger than the mechanisms established to deliver them.

For this reason, NATSIAACC's recommendations should not be viewed as arbitrary amendments to individual components of the Support at Home Program. They represent a coherent package of reforms designed to better align implementation with the Australian Government's existing legislative and policy commitments. Collectively, they strengthen cultural safety, improve equity, reinforce the Aboriginal Community Controlled sector and support the practical implementation of the Government's commitments under Closing the Gap and the Aged Care Act 2024.

Ultimately, the long-term success of the Support at Home Program will depend less on the scale of the reform than on the quality of its implementation. The Australian Government has already established the policy vision. The next stage of reform is ensuring that the operational settings of the Program consistently deliver that vision for Aboriginal and Torres Strait Islander Elders and Older People.

The evidence base is now well established. The policy direction is clear. The opportunity before Government is to ensure implementation fully reflects the realities, priorities and aspirations of Aboriginal and Torres Strait Islander Elders and Older People. Success should ultimately be measured by whether Elders and Older People are able to age well with dignity and self-determination, maintaining connection to family, culture, community and Country or Island Home throughout their ageing journey.

Achieving this will require genuine partnership with the Aboriginal and Torres Strait Islander Ageing and Aged Care ecosystem throughout implementation. Government cannot deliver these reforms alone. Lasting success will depend on shared stewardship that recognises the expertise of Aboriginal Community Controlled Organisations, Aboriginal and Torres Strait Islander Aged Care providers, Elders, Older People, communities and NATSIAACC as the national peak body to ensure implementation delivers measurable outcomes for Aboriginal and Torres Strait Islander Elders and Older People.

NATSIAACC looks forward to continuing to work collaboratively with the Australian Government to ensure the Support at Home Program evolves into a system that not only reflects the principles of the Aged Care Act 2024 but consistently delivers them in practice.



NATSIAACC

National Aboriginal and Torres Strait Islander
Ageing and Aged Care Council

You can find more information at:



www.natsiaacc.org.au



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