
ACTA Response to IHACPA's Consultation Paper on the Pricing Framework for Australian Support at Home Aged Care Services 2026–27

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ACTA

Australian Community Transport Association

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About ACTA

The Australian Community Transport Association (ACTA) is the national peak body representing community transport providers across Australia. Established in 2011, ACTA unites organisations from every state and territory, QLD, NSW, TAS, SA, VIC, ACT, NT, and WA; giving the sector a strong, coordinated national voice. As a not-for-profit company limited by guarantee, ACTA is dedicated to advancing equitable, sustainable, and accessible community transport services nationwide.

ACTA has a proven track record of leading large-scale, complex sector reform and cutting-edge projects. As the key architect behind the development and national trial of the National Community Transport Pricing Model (NCTPM), delivered in the first phase in partnership with the Department of Health, Disability and Ageing, UniSA, and 31 pilot organisations, ACTA has demonstrated capability in sector-wide engagement, governance, and system change. The NCTPM project involved transitioning organisations to mainstream data platforms, developing a national cost-based pricing, implementing a policy evaluation framework, and facilitating some of the most effective sector-department collaborations seen in recent years.

Background

The Independent Health and Aged Care Pricing Authority (IHACPA) has released the Consultation Paper on the Pricing Framework for Australian Support at Home Aged Care Services 2026–27. This consultation seeks stakeholder input to inform the development of pricing advice for the Support at Home program, which aims to consolidate existing in-home aged care services into a single, simplified program to assist senior Australians in living independently at home for longer. The Australian Community Transport Association (ACTA) is submitting a response to this consultation, drawing upon its experience in developing the National Community Transport Pricing Model (NCTPM) and consulting with the broader aged care sector. The NCTPM was developed in collaboration with the University of South Australia and 31 transport providers across every state and territory. It offers Australia's first nationally consistent, evidence-based pricing and policy framework for Community Transport. ACTA's submission aims to ensure that the unique needs and costs associated with Community Transport are adequately considered in the Pricing Framework for Australian Support at Home Aged Care Services 2026-27.

Executive Summary

The Australian Community Transport Association (ACTA) welcomes the opportunity to provide feedback on the Independent Health and Aged Care Pricing Authority's (IHACPA) Consultation Paper: Pricing Framework for Australian Support at Home Aged Care Services 2026–27. As the national peak body representing community transport providers across all states and territories, ACTA brings extensive experience in sector policy advocacy, pricing model development, and sector collaboration, including its leadership in developing the National Community Transport Pricing Model (NCTPM).

ACTA strongly supports IHACPA's consultative approach and acknowledges the need for pricing reform that ensures sustainability, equity, and quality across Support at Home services. However, ACTA remains concerned that current and proposed pricing mechanisms risk undermining critical community transport services and broader aged care outcomes if they fail to reflect the true costs of service delivery particularly for vulnerable, high-needs groups and for services in rural, remote, and thin markets. Community transport delivers far more than point-to-point travel. It enables connection, independence, health access, and social inclusion for senior Australians, often for those with no other transport options. Yet, standard indexation, time-based pricing models for community transport, and inadequate recognition of complexity are threatening service viability and participant wellbeing. This is especially true for clients requiring frequent travel for medical appointments such as dialysis or chemotherapy, where individual budgets could force impossible choices between essential health care and other essential support needed by the participants.

ACTA's submission outlines sixteen targeted, practical recommendations to strengthen IHACPA's pricing advice. The recommendations draw directly from the NCTPM national trial and sector expertise and membership consultation, providing a clear pathway to protect essential transport services during the transition to Support at Home and beyond. ACTA urges IHACPA to embed financial viability, workforce responsiveness, and equitable access to transport services at the centre of aged care pricing for Support at Home and the possible transition of CHSP.

Summary of Recommendations

R1	Explicitly include Provider Financial Viability as a pricing principle to ensure that providers can meet their immediate costs of service delivery, maintain operations, and invest in long-term sustainability. To achieve this, it is also crucial that capital costs, such as vehicles are properly recognised, including how they can be funded (through purchase or lease), how replacement is managed, and the length of grant terms to enable lease agreements to be entered into.
R2	Incorporate a Responsiveness to Evolving Workforce Needs principle, ensuring pricing advice enables providers to attract, retain, and develop a capable workforce that can adapt to changing service demands, workforce expectations, and market conditions, particularly in thin, rural, and remote markets.
R3	ACTA recommends that IHACPA fund ACTA to undertake a Human Capital and Social Benefits Study in partnership with national service sector representatives or intermediates to inform pricing for community transport and other comparable service types. This should quantify the broader health, wellbeing, and social connection outcomes delivered beyond the core service function. The study principles, methodology and instruments should also be applied to other services with embedded social support, such as Meals on Wheels and community engagement programs, to ensure pricing reflects their full value to senior Australians.
R4	ACTA recommends that IHACPA apply targeted commissioning and pricing adjustments in community transport service markets where demand is low making it difficult to utilise vehicles at levels achievable in more densely populated areas, and for population groups with diverse needs . This should account for the additional workforce, cultural, and operational costs of delivering equitable, person-centred services to Aboriginal and Torres Strait Islander peoples, CALD communities, people with dementia, LGBTQIA+ individuals, and those in rural and remote areas.
R5	ACTA recommends IHACPA provide clear, accessible data definitions, guidance materials, and targeted technical support to providers , recognising workforce constraints, IT limitations, and varying levels of data maturity across the sector.
R6	IHACPA should work with ACTA to refresh and analyse NCTPM data annually, enabling real-time visibility of cost trends in rural and remote service delivery. This would provide an evidence-based foundation for differentiated pricing adjustments that protect the long-term sustainability of services in these communities.

R7	ACTA recommends that IHACPA explicitly recognise the significant additional costs of delivering culturally appropriate community transport services to Indigenous Australians, especially in rural and remote areas. Pricing adjustments must reflect the need for flexible, culturally respectful service delivery (including sorry business and kinship obligations), the use of two-person transport teams for safety in high-risk and extreme weather conditions, elevated vehicle running and maintenance costs due to remote travel and rough road conditions, investment in recruiting and developing Aboriginal staff with cultural safety training, and adaptations to honour gender protocols, avoidance relationships, and language preferences.
R8	ACTA recommends that IHACPA recognise the additional costs of delivering culturally safe, person-centred transport services to CALD communities and other groups with specific needs. These costs include cultural competence training, use of interpreters, gender considerations, and workforce development. ACTA has addressed this by incorporating these factors into the National Community Transport Pricing Model (NCTPM) to ensure services remain accessible, appropriate and safe.
R9	ACTA recommends that IHACPA account for the elevated operational and infrastructure costs associated with delivering community transport services in remote and geographically challenging areas. These include extreme weather events, long distances to vehicle servicing, high rates of wear and tear due to poor road conditions, and the need for enhanced staff safety protocols such as two-person teams (especially in rural and remote areas).
R10	IHACPA should stress the fundamental differences between CHSP and Support at Home programs and ensure that pricing models for the transition reflect these distinctions. Specifically, pricing approaches must accommodate the block funding and preventative care focus of CHSP services, such as community transport rather than applying time-based, individualised budget models that risk undermining service sustainability and participant wellbeing. The National Community Transport Pricing Model's approach of needs-based trip allocation with block funding should be incorporated to protect critical services that support connection, independence, and health outcomes for senior Australians during and after the transition.
R11	To support a smooth and effective transition, it is recommended that IHACPA involves ACTA and the sector closely in applying the National Community Transport Pricing Model (NCTPM) pricing and policy arrangements guide before, during and after the implementation of Support at Home.
R12	ACTA recommends that the Minister provide transitional funding and support to help the community transport sector shift smoothly toward more robust data and service delivery systems. This support should be practical, timely, and grounded in the realities of frontline service delivery. It is essential that this transition is not led by external consultants or the Department itself, but by organisations with

	deep practical knowledge of the sector and the ability to work flexibly and responsively with providers on the ground.
R13	ACTA recommends that IHACPA recognise the quality service approach and cost structures associated with community transport services compared to taxis or rideshare providers. Community transport delivers personalised, door-to-door support that is essential to the independence, reablement, and wellbeing of older Australians. Pricing should reflect these service differences to ensure providers can continue to deliver high-quality care and meet community expectations.
R14	ACTA also recommends that IHACPA ensure pricing adequately supports workforce (volunteers and paid staff) sustainability. This includes covering the true costs of attracting and retaining qualified staff through fair wages, professional development, and appropriate training.
R15	The Australian Community Transport Association (ACTA) recommends that IHACPA adopt the indexation approach outlined in the NCTPM Final Report by the University of South Australia. The report proposes a hybrid indexation method that reflects the actual cost structure of community transport services.
R16	IHACPA should engage closely with the Australian Community Transport Association (ACTA) to leverage the rich dataset collected through the National Community Transport Pricing Model (NCTPM). By periodically re-running and analysing this data, IHACPA and ACTA can identify evolving cost differentials and develop evidence-based indexation levels that accurately reflect historical trends for community transport providers.

Commentary and Answers to the Consultation Questions

Consultation Question 1: Do the pricing principles provide adequate guidance for IHACPA's development of pricing advice? If not, what changes do you recommend?

ACTA acknowledges that the proposed pricing principles provide a sound foundation to guide IHACPA's development of pricing advice to the government. However, ACTA strongly supports the sector's current recommendation to explicitly incorporate 'Provider Financial Viability' as a core pricing principle.

It is well documented that providers delivering in-home aged care services, including community transport, have faced persistent financial challenges due to historically inadequate funding models. A significant portion of the sector is operating under severe financial

difficulties, with providers employing temporary or unsustainable measures simply to keep services available for senior Australians.

For example, the National Community Transport Pricing Model (NCTPM) is designed to deliver a fair, equitable, and sustainable pricing framework for community transport providers. While many providers are hopeful that this model will be implemented nationally, achieving immediate financial viability remains out of reach for much of the sector. Without addressing this, any discussion about long-term sustainability is premature. ACTA has already witnessed community transport providers ceasing operations due to financial pressures and unviable market conditions.

In addition to financial viability, ACTA emphasises the need for pricing principles to address Responsiveness to Evolving Workforce Needs (including volunteers). Providers across Australia face increasing difficulty attracting, retaining, and developing staff. Contributing factors include:

- a) Limited access to funding for professional development and training.
- b) Workforce shortages exacerbated by competition with higher-paying industries.
- c) Significant recruitment and retention challenges in thin markets, rural, and remote communities.

Without a workforce equipped to meet current and emerging service demands, including digital capability, cultural safety, and integrated care models, pricing mechanisms cannot deliver sustainable, high-quality services.

In thin markets and geographically isolated areas, the challenges of financial viability and workforce development intersect, creating severe service risks. Without targeted pricing advice that reflects these realities, in-home aged care providers exiting the sector is inevitable, leaving senior Australians without essential supports to live independently at home.

Recommendations:

1. Explicitly include Provider Financial Viability as a pricing principle to ensure that providers can meet their immediate costs of service delivery, maintain operations, and invest in long-term sustainability.
2. Incorporate a Responsiveness to Evolving Workforce Needs principle, ensuring pricing advice enables providers to attract, retain, and develop a capable workforce that can adapt to changing service demands, workforce expectations, and market conditions, particularly in thin, rural, and remote markets.

Consultation Question 2: Are there specific service types, locations and population groups that IHACPA should focus on in future cost collections?

ACTA acknowledges IHACPA and the Department's ongoing efforts to develop unit prices for community transport and sub-type related services under the Support at Home Program and the Commonwealth Home Support Programme (CHSP). As outlined in IHACPA's Pricing Approach for the Support at Home Service List 2025–26, social support is often provided in addition to the core service, with community transport being a clear example of this in practice. Community transport providers deliver far more than just transport, they conduct welfare checks, report participants' physical and mental wellbeing, when possible, facilitate connections to group activities, and provide referrals to other essential support services for senior Australians.

In addition, certain groups within the community, including Aboriginal and Torres Strait Islander peoples, Culturally and Linguistically Diverse (CALD) communities, people living with dementia, and LGBTQIA+ individuals frequently require additional, tailored support during transport services to ensure their specific needs are met. Findings from the National Community Transport Pricing Model (NCTPM) confirm that these additional support functions are a fundamental part of community transport service delivery, differentiating it from mainstream transport options.

For example, in rural and remote areas, particularly when servicing Aboriginal and Torres Strait Islander communities, providers deliver culturally appropriate services that reflect

customs, traditions, and communication preferences. These service features, though essential to quality and culturally safe care, have historically gone uncoded, resulting in historical underfunding, despite increasing aged care participant expectations and service complexity.

While ACTA acknowledges IHACPA's inclusion of social support considerations within the current costing study, we believe that further work is needed to properly quantify the full economic and social contribution of community transport, as well as other comparable service types. In particular, a deeper understanding of human capital impacts, social benefits, and service interdependencies is essential to ensure pricing models are both accurate and sustainable.

It is essential that any pricing and policy mechanisms account for the cost of infrastructure, particularly vehicles in geographic areas where demand is too low to achieve high utilisation rates. It is not sustainable to drive a vehicle hundreds of kilometres to deliver a transport service, only to return to base without passengers. If this is the only viable solution, both legs of the journey should be funded appropriately.

A more efficient and sustainable approach would be to commission services regionally and fund them based on their fixed operational costs, such as vehicle leases, maintenance, garaging, and administration, while providing a smaller variable payment for each trip delivered. This model would also require a shift in reporting away from simply counting trip numbers, toward capturing more meaningful data about service coverage and community impact.

ACTA has developed a model that supports this approach and would welcome the opportunity to share it.

Recommendations:

3. ACTA recommends that IHACPA fund ACTA to undertake a Human Capital and Social Benefits Study in partnership with national service sector representatives or intermediates to inform pricing for community transport and other comparable service types. This should quantify the broader health, wellbeing, and social connection

outcomes delivered beyond the core service function. The study principles, methodology and instruments should also be applied to other services with embedded social support, such as Meals on Wheels and community engagement programs, to ensure pricing reflects their full value to senior Australians.

4. ACTA recommends IHACPA apply targeted pricing adjustments for community transport services in thin markets and for groups with diverse needs. This should account for the additional workforce, cultural, and operational costs of delivering equitable, person-centred services to Aboriginal and Torres Strait Islander peoples, CALD communities, people with dementia, LGBTQIA+ individuals, and those in rural and remote areas.

Consultation Question 3: How can IHACPA better support providers to participate in its cost collections to continue to improve their representativeness?

ACTA highlights key lessons from the National Community Transport Pricing Model (NCTPM), where 31 community transport providers contributed financial and service delivery data (trip-level data). This process revealed several barriers to effective data collection:

- a) Providers face competing pressures from government-funded programs (reforms and never-ending changes) and service quality requirements, limiting their capacity to engage in detailed data reporting, particularly where workforce resources are limited.
- b) Complex or unclear data field specifications often lead to poor data quality, especially where staff lack adequate training in data entry requirements.
- c) Many providers face IT system limitations, with reporting modifications being expensive and unaffordable for organisations already operating under severe financial pressure
- d) Clear, accessible data definitions and guidance materials significantly improve understanding and data quality, particularly for staff unfamiliar with technical data terms.

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- e) Some providers, including those in community transport, lack detailed mapping of service workflows, limiting their ability to provide accurate, cost-centre level financial data.

Recommendation:

5. ACTA recommends IHACPA provide clear, accessible data definitions, guidance materials, and targeted technical support to providers, recognising workforce constraints, IT limitations, and varying levels of data maturity across the sector.

Consultation Question 4: What factors should IHACPA take into account when considering pricing adjustments for services provided in rural and remote areas?

The Australian Community Transport Association (ACTA) recommends that IHACPA place strong emphasis on the real-world cost drivers that make service delivery in rural and remote areas fundamentally different and significantly more expensive than in metropolitan or regional settings.

Through the National Community Transport Pricing Model (NCTPM), ACTA engaged with community transport providers across Australia, including many operating in remote locations such as Tennant Creek (NT). These providers reported multiple compounding factors that drive higher operational costs, including:

- **Long travel distances for vehicle repairs and servicing**
- **Higher fuel consumption and costs**
- **Severe workforce shortages**
- **Reduced economies of scale**
- **Limited access to backup resources** (e.g. technology, transport options, or casual staff).

Tennant Creek Transport, working group participant of the NCTPM Pilot Project, which ceased operations on 30 June 2024, is a clear example of how these combined factors can make rural service delivery unsustainable even when there is strong local demand.

TCT faced:

- Delays in vehicle repairs. This meant long downtime and high costs just to maintain fleet operations.
- Severe driver shortages, with few people locally available or willing to work under the conditions, despite extensive efforts to recruit.
- Rapidly rising costs in fuel, insurance, and compliance with no adequate pricing adjustments on their government-funded contract to reflect these realities.

Following TCT closure, Aboriginal and vulnerable communities were left without transport options and access to other essential services.

Recommendation:

6. IHACPA should work with ACTA to refresh and analyse NCTPM data annually, enabling real-time visibility of cost trends in rural and remote service delivery. This would provide an evidence-based foundation for differentiated pricing adjustments that protect the long-term sustainability of services in these communities. Ultimately, without pricing structures that reflect these real costs, there is a genuine risk of service gaps or provider exits from rural and remote areas leaving senior Australians in those communities without access to essential services, not just transport.

Consultation Question 5: What factors should IHACPA take into account when considering pricing adjustments for services provided for people from Aboriginal and Torres Strait Islander communities, people from culturally and linguistically diverse backgrounds and other people with special needs?

Recommendations:

7. ACTA recommends that IHACPA explicitly recognise the significant additional costs of delivering culturally appropriate community transport services to Indigenous Australians, especially in rural and remote areas. Pricing adjustments must reflect the need for flexible, culturally respectful service delivery (including sorry business and kinship obligations), the use of two-person transport teams for safety in high-risk and extreme weather conditions, elevated vehicle running and maintenance costs due to remote travel and rough road conditions, investment in recruiting and developing Aboriginal staff with cultural safety training, and adaptations to honour gender protocols, avoidance relationships, and language preferences.
8. ACTA recommends that IHACPA recognise the additional costs of delivering culturally safe, person-centred transport services to CALD communities and other groups with specific needs. These costs include cultural competence training, use of interpreters, gender considerations, and workforce development. ACTA has addressed this by incorporating these factors into the National Community Transport Pricing Model (NCTPM) to ensure services remain accessible, appropriate and safe.
9. ACTA recommends that IHACPA account for the elevated operational and infrastructure costs associated with delivering community transport services in remote and geographically challenging areas. These include extreme weather events, long distances to vehicle servicing, high rates of wear and tear due to poor road conditions, and the need for enhanced staff safety protocols such as two-person teams (especially in rural and remote areas). In addition, vehicle insurance, fuel, and maintenance costs are significantly higher, and recruitment and retention strategies often require additional investment in housing, relocation, and extended leave entitlements. Pricing structures must reflect these realities to ensure viable and consistent service delivery.

ACTA is well positioned to provide practical solutions and further context to support this recommendation.

Consultation Question 6: What provider or participant-related factors should IHACPA take into account when considering data requirements and the pricing approach for the transition of the CHSP to the Support at Home program?

ACTA stresses that the transition from CHSP to Support at Home is complex because the two programs operate under fundamentally different assumptions. CHSP is centred on community support, block funding, and preventative care, while Support at Home is built around individualised funding and market-driven or multi-provider models.

For example, transport services under Support at Home face early signs that time-based pricing models threaten the sustainability of the service for keeping senior Australians connected, independent, and engaged in their communities. The National Community Transport Pricing Model (NCTPM) recommends allocating trips based on assessed needs, ensuring individuals receive tailored support. Rather than minute-by-minute billing, funding is provided to organisations through block funding. This approach recognises that some participants, such as those undergoing chemotherapy or dialysis, require more frequent travel and medical assistance. An individual budget model could force these participants to choose between essential medical trips and other necessary services, risking their health and wellbeing.

If the government proceeds with merging the programs, pricing must reflect this complexity. Treating CHSP simply as a smaller version of Home Care Packages risks undermining service viability and the preventive outcomes these services deliver.

The NCTPM was built on real, evidence-based data drawn from 31 service providers across the country. However, the accuracy and reliability of this data were only possible because of the extensive groundwork undertaken by ACTA. This included working directly with frontline staff; drivers, schedulers, and managers to improve how data was recorded, engaging with

software providers to adjust systems, and supporting organisations through complex software transitions. ACTA was often just a phone call away, helping teams navigate new processes. This was not just a data collection exercise; it was a significant upskilling and change management effort. One of the key lessons learned is that you cannot simply demand data from organisations, you must invest in engagement, capacity building, and transition support to ensure data integrity and sector-wide success.

Recommendations:

10. IHACPA should stress the fundamental differences between CHSP and Support at Home programs and ensure that pricing models for the transition reflect these distinctions. Specifically, pricing approaches must accommodate the block funding and preventative care focus of CHSP services, such as community transport rather than applying time-based, individualised budget models that risk undermining service sustainability and participant wellbeing. The National Community Transport Pricing Model's approach of needs-based trip allocation with block funding should be incorporated to protect critical services that support connection, independence, and health outcomes for senior Australians during and after the transition.
11. To support a smooth and effective transition, it is recommended that IHACPA involves ACTA and the sector closely in applying the National Community Transport Pricing Model (NCTPM) pricing and policy arrangements guide before, during and after the implementation of Support at Home.
12. ACTA recommends that the Minister provide transitional funding and support to help the community transport sector shift smoothly toward more robust data and service delivery systems. This support should be practical, timely, and grounded in the realities of frontline service delivery. It is essential that this transition is not led by external consultants or the Department itself, but by organisations with deep practical knowledge of the sector and the ability to work flexibly and responsively with providers on the ground.

Consultation Question 7: What future priorities should IHACPA consider when developing pricing advice for the Support at Home service list?

Flat-rate pricing models fail to recognise the diverse and complex needs of senior Australians accessing Support at Home services. Clients with dementia, higher psychological needs, or limited family support require significantly more time, planning, and skilled staff to receive quality care. Without pricing, that reflects this complexity, providers face an unavoidable choice: absorb the additional costs or reduce services to the most vulnerable, effectively reducing equity and quality of care.

Moreover, the aged care sector is struggling with a severe workforce shortage driven by inadequate wages and challenging working conditions. While pricing alone cannot solve workforce retention, it must not exacerbate the problem. Current pricing structures that fail to compensate for complexity and indirect costs contribute to workforce dissatisfaction and attrition.

Indirect transport services such as taxis or rideshares, often funded under aged care government-funded programs, do not provide the same level of care, reliability, or client safety as specialist community transport. Adequate costing for community transport services that deliver tailored, quality care is essential to maintain service standards and ensure senior Australians' reablement, independence and wellbeing.

As discussed in Question 2, the issue of commissioning in low-demand geographic areas is central to addressing service access and sustainability. This point should be strongly reinforced and prioritised here. Services in rural and remote locations often face disproportionately high infrastructure and operational costs, and flat-rate pricing models are especially inadequate in these contexts. Without a commissioning and pricing model that accounts for these challenges, the risk of service failure and inequitable outcomes for regional and remote communities will persist.

Furthermore, while some aged care programs apply general indexation to account for market conditions, inflation, and labour cost increases, findings from the National Community Transport Pricing Model (NCTPM) reveal that many community transport providers, particularly those funded under the Commonwealth Home Support Programme have

experienced insufficient contract price adjustments. This gap between actual labour cost growth and funding adjustments, combined with broader economic pressures has placed significant strain on providers. These impacts are particularly critical for providers in rural and remote areas, where operational expenses and workforce shortages are already elevated. Additionally, recent wage-related decisions have further increased labour costs for providers delivering government-funded aged care services reliant on affected workforce groups, such as the Fair Work Commission's wage increases.

The Australian Community Transport Association (ACTA) recommends that IHACPA adopt the indexation approach outlined in the NCTPM Final Report by the University of South Australia. The report proposes a ¹hybrid indexation method that reflects the actual cost structure of community transport services. As detailed in Chapter 3 of the report, labour comprises approximately 60% of total costs, vehicle-related expenses account for 25%, and the remaining share is attributed to overheads. Accordingly, ACTA supports a weighted indexation approach across these three key cost categories:

- Labour-linked component (~60%): Indexed to the Wage Price Index (WPI) published by the Australian Bureau of Statistics, which most accurately reflects wage and employee-related cost trends in the sector.
- Transport-linked component (~25%): Indexed to a transport-specific price index—specifically, the ABS Motor Vehicle Costs Index within the broader Consumer Price Index (CPI). This includes inputs such as fuel, spare parts, repairs and maintenance, registration, and insurance, and best captures cost changes associated with vehicle operations.

Recommendations:

- 13.** ACTA recommends that IHACPA recognise the higher quality standards and cost structures associated with community transport services compared to taxis or rideshare providers. Community transport delivers personalised, door-to-door support

¹ Vij, A., Sun, W. (S.), Barrie, H., Washington, L., Cong, K., Faulkner, D., Qian, W., Ardeshiri, A., Coates, M., & Urrutia, D. (2025). *National Community Transport Pricing Model (NCTPM) Pilot: Final report*. Australian Community Transport Association & iMOVE Cooperative Research Centre.

that is essential to the independence, reablement, and wellbeing of older Australians. Pricing should reflect these service differences to ensure providers can continue to deliver high-quality care and meet community expectations.

- 14.** ACTA also recommends that IHACPA ensure pricing adequately supports workforce (volunteers and paid staff) sustainability. This includes covering the true cost of attracting and retaining qualified staff through fair wages, professional development, and appropriate training. A skilled and stable workforce is critical to the safe, reliable, and person-centred delivery of community transport services.
- 15.** The Australian Community Transport Association (ACTA) recommends that IHACPA adopt the indexation approach outlined in the NCTPM Final Report by the University of South Australia. The report proposes a hybrid indexation method that reflects the actual cost structure of community transport services.
- 16.** IHACPA should engage closely with the Australian Community Transport Association (ACTA) to leverage the rich dataset collected through the National Community Transport Pricing Model (NCTPM). By periodically re-running and analysing this data, IHACPA and ACTA can identify evolving cost differentials and develop evidence-based indexation levels that accurately reflect historical trends for community transport providers.