

Submission
Delivering Quality Care More Efficiently

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1. Executive summary

- Attain Healthtech companies are at the leading edge of delivering quality care more efficiently and strongly support the important work of the Productivity Commission.
- Attain company Mable is encouraging independent contractors that work in aged care or the NDIS to consider clients outside of their usual area of practice.
- Attain strongly supports greater regulatory alignment across the NDIS and aged care in worker screening and acknowledges the burden the inconsistent approach across jurisdictions has placed on both providers and aged care workers (including independent contractors).
- Attain calls for worker screening to be managed directly by the Commonwealth to ensure consistency in processes, costs and outcomes across Australia.
- Attain strongly supports a single system of worker registration for the care economy and endorses the Productivity Commission position that such a scheme should acknowledge existing registration processes for clinicians.
- Attain endorses in principle the notion of a single system of provider registration but encourages the Productivity Commission to look at the nuanced approach adopted under *Aged Care Act 2024* through which a risk proportionate approach to registration is adopted.
- Attain contends that an industry neutral approach should be adopted to the regulation of artificial intelligence and does not believe a case has been made for industry specific AI regulation in the care economy.
- Attain Healthtech would encourage the Productivity Commission to examine the benefits of self management in aged care.

2. About Attain Healthtech

Attain Healthtech is a leading health technology group that comprises health tech platform Mable Technologies Pty Ltd, aged care approved provider Self Managed Support Pty Ltd (trading as HomeMade), and registered plan manager Leap In!.



Mable is a health tech platform that offers a complementary approach to traditional aged care at home and disability support models. Mable gives older persons and people with disabilities more choice, control and flexibility to shape the care and support they receive in their own homes and communities. This choice is made possible by over 21,000 independent contractors providing valuable and necessary care and support services via the platform. Founded in 2014, Mable now operates at some scale with support providers on the platform providing care and support services to over 28,000 people with disability and older Australians.

HomeMade is an approved aged care provider that enables older people to self-manage their home care packages. Founded in 2021, HomeMade now operates at scale, with 4,000 older people choosing HomeMade as their approved provider to access services and supports at home. HomeMade recognises the importance of effective systems and processes to provide customers with freedom and control to access services and support on their terms, combined with effective safeguards to ensure high-quality care and compliance with home care package guidelines and requirements.

Leap in! Is one of Australia's leading NDIS plan managers. Established in Queensland, Leap in! now supports more than 14,000 participants across Australia. Leap in! is a business driven by purpose and exists to help people with a disability live their best life by getting the most out of their NDIS Plans. A Queensland based company, Leap In! is a significant employer of people with lived experience of disability, particularly single mothers of children with disability. In the current financial year, 60 per cent of the Leap In! workforce has lived experience of disability. Tech based plan managers like Leap In! enable flexible work and are key employers of both people with disability and vulnerable minority communities.

Across the group, Attain companies are at the leading edge of delivering quality care more efficiently. Attain strongly supports the important work of the Productivity Commission and is grateful for the opportunity to provide further comment. Attain's comments respond to Draft Recommendation 1.1.¹

3. Attain Group: A Case Study in Cohesive Care

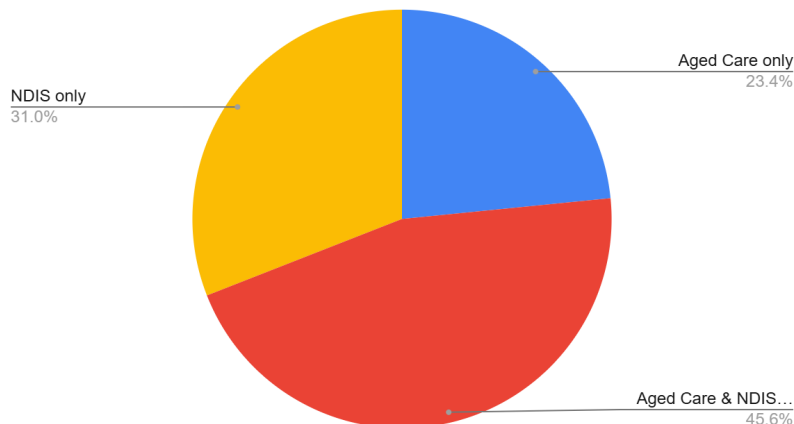
The Attain Group is evidence of the benefits that can be achieved through a more cohesive care economy. Attain company Mable is a digital platform that enables support providers (who are independent contractors) to contract directly with older persons and people with disabilities. Mable's comprehensive onboarding and verification processes have been designed to be sector neutral, so that independent contractors can choose which clients with which they would like to engage, with appropriate safeguards.² As a result, Mable is already encouraging independent contractors that work in aged care or the NDIS to consider clients outside of their usual area of practice. While the majority of support providers choose to specialise, an increasing cohort is choosing to work outside their area of specialty. In the most recent financial year, 45.6 per cent of

¹ *Delivering quality care more efficiently Interim report*, Productivity Commission, 2025, [link](#), pp. 2-3.

² There are, of course, exceptions and support providers can only access certain cohorts if they meet regulatory requirements. For example, only support providers that have provided a Worker with Children Check are able to provide care and support to NDIS participants that are children.

support providers that worked with two or more clients worked with both aged care and NDIS clients.

Proportion of SPs by Sector (FY 2025)



Data Set: Proportion of Support Providers with two or more clients, by client funding source

4. Worker Screening Alignment

Attain strongly supports greater regulatory alignment across the NDIS and aged care in worker screening. Given the changes introduced under *Aged Care Act 2024*, Mable is presently undertaking a project of moving to the NDIS Worker Screening Check as a mandatory feature on the platform, to replace its existing system of National Police Checks. While there are clear benefits to this change, the inconsistencies between jurisdictions also create problems. Mable previously was able to offer new support providers these police checks at the low price of \$44. However, the price of NDIS Worker Screening Checks is more prohibitive, particularly for independent contractors working in low income, rural and regional communities. This can be particularly burdensome when more than one class of check is required, such as both a Working with Children Check and a NDIS Worker Screening Check.

Price of NDIS Worker Screening Checks by Jurisdiction (as at 1 July 2025)³

NSW	Vic	Qld	WA	SA	ACT ⁴	Tas	NT
\$107 ⁵	\$135.50 ⁶	\$156 ⁷	\$145 ⁸	\$140 ⁹	\$157 ¹⁰	\$133.70 ¹¹	\$145 ¹²

In two jurisdictions – ACT¹³ and Tasmania¹⁴ – all individuals that seek to work in the NDIS are required to have a Working with Vulnerable Person check. In the remaining six jurisdictions, a Working with Children Check is only required if one seeks to work with children. Mable has integrated into its platform safety features which ensure that only those support providers with a Working with Children check are able to support children. Attain supports a system where a single check is in place to streamline processes and with equalise cost across all jurisdictions. In recent years, the upfront cost of NDIS Worker Screening Checks has increased substantially with different state jurisdictions using the higher prices in other jurisdictions to justify increasing the fees.

Price of Working with Children Checks by Jurisdiction

NSW	Vic	Qld ¹⁵	WA	SA	ACT ¹⁶	Tas ¹⁷	NT
\$107 ¹⁸	\$135.50 ¹⁹	\$104.70 ²⁰	\$87 ²¹	\$140 ²²	\$157 ²³	\$133.70 ²⁴	\$87 ²⁵

In some jurisdictions, such as Victoria, a rebate is available to prevent workers from being required to pay for both checks if these are necessary for their role.²⁶ Similarly in Queensland, a reduced price is available to individuals with a NDIS Worker Screening to apply for a Blue Card (which provides a Working with Children Check).²⁷ However, the sheer complexity of having eight different

³ NB: These are the price points that apply to paid independent contractors and employees, different prices or, in some jurisdictions no price, apply for volunteers.

⁴ Please note, the NDIS Worker Clearance is integrated into the Working with Vulnerable People process by the ACT Government.

⁵ "Apply for an NDIS Worker Check", Service NSW, accessed: 1 September 2025, [link](#).

⁶ "NDIS Worker Screening Check", Vic.gov.au, accessed: 1 September 2025, [link](#).

⁷ "Disability Worker Screening", Department of Justice Qld, accessed: 1 September 2025, [link](#).

⁸ "Applying for an NDIS Check", Department of Communities WA, accessed: 1 September 2025, [link](#).

⁹ "Fees", sa.gov.au, accessed: 1 September 2025, [link](#).

¹⁰ "Apply for or renew a WWVP registration", Access Canberra, accessed: 1 September 2025, [link](#).

¹¹ "Fees", Department of Justice Tasmania, accessed: 1 September 2025, [link](#).

¹² "NDIS Worker Screening Check", NT Police, Fire and Emergency Services, accessed: 1 September 2025, [link](#).

¹³ "Working With Vulnerable People scheme", Access Canberra, accessed: 1 September 2025, [link](#).

¹⁴ "Do I need a RWVP?", Department of Justice Tasmania, accessed: 1 September 2025, [link](#).

¹⁵ In Queensland the Working with Children Check is contained within the Blue Card process.

¹⁶ Please note in the ACT the process is known as the Working with Vulnerable People and is mandatory for all NDIS support workers..

¹⁷ Please note in Tasmania the process is known as the Working with Vulnerable People and is mandatory for all NDIS support workers.

¹⁸ "Working with Children Check", NSW Office of the Children's Guardian, accessed: 1 September 2025, [link](#).

¹⁹ "Apply for a Working with Children Check", Service Victoria, accessed: 1 September 2025, [link](#).

²⁰ "Pay for your blue card application," Qld Government, accessed: 1 September 2025, [link](#).

²¹ "Working with Children Check - Application and renewal process," wa.gov.au, accessed: 1 September 2025, [link](#).

²² "Fees", sa.gov.au, accessed: 1 September 2025, [link](#).

²³ "Apply for or renew a WWVP registration", Access Canberra, accessed: 1 September 2025, [link](#).

²⁴ "Apply for registration to work with vulnerable people," Service Tasmania, accessed: 1 September 2025, [link](#).

²⁵ "Working with children clearance: apply and renew", accessed: 1 September 2025, [link](#).

²⁶ "NDIS Worker Screening Check", vic.gov.au, accessed: 1 September 2025, [link](#).

²⁷ "Pay for your blue card application," Queensland Government, accessed: 1 September 2025, [link](#).

systems, with eight different approval processes, eight different fee structures, eight different wait times and eight different thresholds for screening represents a significant burden on nationally based care businesses seeking to operate across Australia. The Productivity Commission recommendation to establish a single national screening clearance could potentially unlock significant benefits for the entire care economy.²⁸ Attain calls for worker screening to be managed directly by the Commonwealth to ensure consistency in processes, costs and outcomes across Australia.

5. A Single System of Worker Registration

In a similar manner, Attain strongly supports a single system of worker registration for the care economy.²⁹ In recent months, Attain companies have commented positively on the proposal by the Department of Health, Disability and Aged Care for a national registration scheme for personal care workers in Australia.³⁰ The *Aged Care Act 2024* has introduced a comprehensive set of requirements for aged workers, including new training obligations. Attain would strongly support a care economy wide approach to registration of workers and tracking of training obligations in line with that which currently exists for nurses in Australia. Attain also endorses the Productivity Commission position that such a scheme should acknowledge existing registration processes for clinicians such as nurses and allied health practitioners, with a view to reducing duplication.

6. A Single System of Provider Registration

In relation to a single system of provider registration³¹, Attain endorses this notion in principle, but wishes to provide further comment for consideration. In the view of Attain, the approach adopted under *Aged Care Act 2024* is a commonsense solution. Under the new Support at Home system, not all providers are proposed to be registered. Instead, there is a risk proportionate approach to registration, in which all older persons must utilise a registered provider, but may also utilise associated providers and digital labour platforms *in addition to* their registered provider. This is similar to the approach adopted by the Wade Taskforce for changes to provider and worker registration in NDIS which recommended risk proportionate registration and enrollment.³² Attain supports a nationalised system which incorporates all care economy providers, as long as such a system has a risk proportionate approach to risk and does not treat, for example, a national care provider the same as a sole trader cleaning homes or mowing lawns.

²⁸ Ibid, Productivity Commission, p. 2.

²⁹ Ibid, Productivity Commission, p. 2.

³⁰ See: *Have your say on the design of a national registration scheme for personal care workers in aged care*, 17 April 2025, [link](#).

³¹ Ibid, Productivity Commission, p. 2.

³² "NDIS Provider and Worker Registration Taskforce", Department of Health, Disability and Aged Care, 30 July 2025, [link](#).

Overview of provider types under Aged Care Act 2024

Type of provider/entity	Description	Example	Obligations
Registered Provider (previously approved providers)	All age care clients must use a registered provider. The registered provider has responsibility for care management, monitoring and ensuring supports are delivered in line with the Aged Care Standards.	HomeMade	Meeting the Strengthened Aged Care Quality Standards, Upholding the Charter of Aged Care Rights & Complying with the Code of Conduct.
Digital Labour Platform Operator	Digital Platform Operators are regulated under the Aged Care Act, but their obligations are less than registered providers in recognition of their role as ancillary to registered providers.	Mable Technologies	Supporting Registered Providers to meet their obligations, with some minimal requirements to be specified via regulation.
Associated Provider	Associated providers is a catch all term to refer to any entity or contractor which is not an employee to a registered provider but is involved in the provision of services.	A small business delivering approved services (e.g. laundry, gardening, house cleaning)	Any misconduct is the responsibility of the Registered Provider, However, Registered Providers may require certain actions (e.g. undertake training, provide evidence of services provided) in order to permit an associated provider to continue engaging with their clients.
Aged Care Worker	"Aged care workers"	An employee of a	Obligated to

	can include both employees of registered providers and independent contractors.	traditional aged care provider or an independent contractor using a digital labour platform	undertake training, ensuring screening is up to date and may be subject to banning orders.
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Under the Aged Care Act 2024, given the risk proportionate approach of the act, not all providers are subject to audits against quality standards. This is an obligation which only rests with registered providers, as only registered providers are required to conform to the care standards. A similar approach was recommended by Natalie Wade, who called for universal registration and enrollment of all NDIS providers, but only recommended that Audits against quality standards apply to the two highest categories of providers, that is those subject to “Advanced Registration” and “General Registration”.³³ Even so, Attain does not oppose mutual recognition of audits across the Aged Care and NDIS sectors, as long as the approach adopted maintains the risk proportionate principle that not all providers should be subject to audit.

7. The Regulation of Artificial Intelligence in the care economy

In relation to the regulation of artificial intelligence³⁴, Attain contends that an industry neutral approach should be adopted to regulation. Attain does not believe a case has been made for a specifically regulatory regime for artificial intelligence within the care economy. That being said, Attain supports in principle the approach of consistency in regulation including in artificial intelligence.

8. Benefits of self management

One additional area that Attain Healthtech would encourage the Productivity Commission to examine is the benefits of self management in aged care. While Attain understands that the proportion of older people that choose to self manage their home care packages remains in the minority, this will continue to grow as more tech savvy older Australians retire. Self management is a powerful tool to unlock productivity benefits. Each older person must choose an approved provider³⁵ and enter into a service agreement with them so that the provider can build their care plan and budget with them, manage payments and claims, ensure they receive high-quality, rights-based care to meet their needs and be responsive to adjust the plans as their needs change. For those older people that are able to, self management enables meaningful choice and control as they select which service providers help them in the home, while also unlocking additional hours of support through lower fee arrangements. By way of background, HomeMade fees in the current system amount to 15 per cent of package value for self managed participants, in comparison to fees of up to 35 per cent charged by traditional providers.

³³ Wade et al, *NDIS Provider and Worker Registration Taskforce Advice*, 2 August 2024, Department of Health, Disability and Aged Care, [link](#), p. 113.

³⁴ Ibid, Productivity Commission, p. 2.

³⁵ “Registered provider” from 1 November 2025.



Attain Healthtech is grateful for the opportunity to participate in this public consultation process. Attain would welcome the opportunity to be part of any future dialogue arising from the Productivity Commission's work.