



7 October 2026

Ms Danielle Wood
Chair
Productivity Commission

Via email: businessreporting@pc.gov.au

Dear Chair

Improving Non-Financial Business Reporting Requirements – Aged Care

Ageing Australia is the national peak body representing providers across the aged care sector, including retirement living, seniors housing, residential care, home care, community care and related services.

Effective and productive regulation must support person-centred care with dignity, choice and quality, enabling innovation and a sustainable sector. It must also remove duplication, disproportionate administrative burdens and other requirements that do not ensure or improve care outcomes.

Aged care providers are experiencing significant regulatory, financial and workforce pressures. These are underpinned by funding not keeping pace with evolving care requirements and increasing delivery costs.¹ They are exacerbated by compounding impacts of reform since the Royal Commission into Aged Care Quality and Safety, increased requirements of the Aged Care Act 2024 (which commenced late last year) and a range of implementation challenges. These include increasing reporting requirements placing additional burdens on an increasingly strained sector.

Our recommendations

R1: Reduce unnecessary regulatory burden by

- a) introducing reporting principles based on proportionality, cumulative burden and regulatory value to maximise time caring for older people;**
- b) using existing data to reduce duplicative reporting, including a “tell us once” approach across the care economy;**

¹ Ageing Australia '[More than 3,000 aged care beds shelved after funding decision](#)' (7 October 2026)



- c) **using a reporting value assessment before introducing or retaining obligations, including sector consultation; and**
- d) **standardising key definitions, datasets and reporting requirements across government, allowing variation only where clearly justified.**

R2: Improve interoperability and digital capability by

- a) **establishing a 'Digital Capability Fund' to support software updates, interoperability, automation, and innovation that reduces administrative burden and improves care outcomes; and**
- b) **requiring regulatory roles to publish readiness criteria before major policy, digital, claiming or reporting changes commence.**

Examples - the cumulative impacts of reporting

Individual reporting obligations should not be considered in isolation. The cumulative impact of multiple reporting, compliance, assurance and information requirements across various government programs and agencies must be considered together.

Individual requirements may serve a legitimate purpose, yet their combined impact often creates administrative effort that is disproportionate to regulatory value. Providers must repeatedly extract, reconcile, validate and submit similar information across multiple platforms, systems and agencies.

The cumulative effect is a significant diversion of organisational resources away from frontline care and service delivery, workforce development, innovation and service improvement. These impacts are particularly significant for home care 'associated' (sub-contractor) providers, and for smaller and medium-sized providers with limited regulatory and data capability.

Similar / overlapping requirements

Residential care providers are frequently required to provide similar or overlapping information through separate systems, different formats, inconsistent definitions and varying reporting periods.



Providers have told us that the burden extends beyond submitting information and includes interpreting reporting requirements, extracting data, reconciling datasets, validating information, maintaining evidence and responding to follow-up requests.

Different programs and sectors

Administrative burden and costs associated with registration, accreditation and audit under dual systems is a particular pressure point for providers operating under both the aged care system and NDIS.

Dual registration requires providers to engage with two regulators, undergo separate audits, and maintain compliance with two sets of quality standards, policies, and reporting obligations.

One small-to-medium Ageing Australia member providing services to older people across the Commonwealth Home Support Program, Support at Home program and National Disability Insurance Scheme reported duplicated associate provider compliance requirements, complex care management and claiming processes, and fragmented My Aged Care and Services Australia systems.

Accreditation processes can also require substantial time commitment from staff to ensure all requirements are met. While audit costs can vary, one provider estimates they have paid \$90,000 in fees to an external company within the past eighteen months, for a full audit and mid-term audit. The level of burden and cost is also not proportionate to providers who only have a small number of NDIS participants in their care.

Reporting to multiple entities

Support at Home care management regulation spans multiple reporting entities.

The Department of Health, Disability and Aged Care's Support at Home assurance pricing review² focused on how providers structure their prices. Providers surveyed were required extensive reporting of eight services including care management, personal care and nursing care.

² [Support at Home Assurance - Pricing review summary report](#)



The Aged Care Quality and Safety Commission also conducts quarterly and annual prudential reviews³ covering pricing, service agreements and participant statements, and also identifies care management charging issues through its complaints processes.

Multiple associated providers

Associated providers in Support at Home working across multiple registered providers face different contractual requirements and repeated requests for worker screening information.

For one allied health organisation with more than 1,100 staff delivering services through over 500 registered providers, each registered provider is required to retain and submit the relevant worker screening records. This duplicates the collection and storage of information, increases administrative costs and creates privacy concerns.

How to ensure productive reporting

A principles based framework

Reform focused on productive reporting should be guided by the following principles:

- *Proportionate and risk-based reporting* - Reporting obligations should reflect regulatory purpose, provider risk and demonstrated compliance performance
- *Assess cumulative burdens* – Assess the combined impacts of multiple reporting obligations, and identify overlap and unnecessary complexity
- *Reporting value assessment* - New and existing reporting requirements should be assessed against the regulatory benefit generated compared with the compliance cost imposed.

A more proportionate reporting framework would align the amount, frequency and complexity of reporting with the level of risk to older people, rather than applying uniform obligations regardless of risk profile. A risk-based reporting model should recognise provider capability, compliance history, service complexity and consumer vulnerability.

³ [Financial and Prudential Monitoring, Compliance and Intervention Framework | Australian Government Department of Health, Disability and Ageing](#); [Quarterly Financial Report | Australian Government Department of Health, Disability and Ageing](#); [2025–26 Annual Prudential Compliance Statement \(APCS\) Guidelines | Australian Government Department of Health, Disability and Ageing](#)



A principles-based reporting framework would improve information quality and regulatory effectiveness while reducing unnecessary administrative burden and allowing providers to focus more resources on delivering safe, high-quality care.

Using existing data

Regulatory burden can be reduced through a coordinated 'report once, use many times' approach that reduces duplicate information requests, reuses existing government-held data, improves inter-agency information sharing, and applies proportionate reporting requirements.

For example, the Department and the Commission should coordinate information requests, reuse evidence and set proportionate response timeframes, taking account of the combined regulatory burden on providers. This would reduce duplication while preserving effective oversight and timely complaint resolution.

Standardised evidence requirements, supported by a secure national single-entry database and amendments to the Aged Care Rules 2025 would remove unnecessary duplication, and enable information to be recorded once and accessed by authorised providers while maintaining accountability.

Before introducing new requirements

Before introducing reporting requirements, government should assess:

- what regulatory purpose the information supports
- how the information will be used
- whether government already holds the information elsewhere
- whether reporting can be automated
- the compliance cost imposed; and
- whether the regulatory benefit justifies the burden.

Such assessment should be informed by engagement with the sector.

Standardising reporting requirements

Inconsistent definitions create additional administrative effort, manual interpretation and reconciliation requirements.



For example, requirements for residential care provider quarterly financial reporting are not aligned to how providers capture and report data requested. Definitions can be either too specific where a provider does not record the data at the level of granularity required, or the definitions are vague and open to interpretation.

Government agencies should align:

- definitions
- classifications
- reporting periods
- provider identifiers
- evidence requirements
- calculation methodologies; and
- information formats.

R1: Reduce unnecessary regulatory burden by

- a) introducing reporting principles based on proportionality, cumulative burden and regulatory value to maximise time caring for older people;**
- b) using existing data to reduce duplicative reporting, introducing a “tell us once” approach across the care economy;**
- c) using a reporting value assessment before introducing new obligations, including sector consultation; and**
- d) standardising key definitions, datasets and reporting requirements across government, allowing variation only where clearly justified.**

Improving interoperability and digital capability

Fragmented reporting systems contribute significantly to administrative burden.

Providers report challenges including manual data entry, repetitive processes, system limitations and requirements to resubmit information already provided.

Government must invest in interoperable reporting systems that support:

- common data standards



- automated data exchange
- application programming interfaces where appropriate
- pre-populated reporting fields
- automated validation processes; and
- secure government-provider data exchange.

Digital reform should simplify reporting processes rather than replicate existing administrative requirements in numerous online formats.

Reliable digital infrastructure is fundamental to the efficiency of aged care programs.

Government digital reform frameworks recognise digital maturity, interoperability, secure data sharing, digital foundations and workforce digital capability as essential to safe and sustainable service delivery.⁴ However, providers continue to report data mismatches and digital issues across My Aged Care, Services Australia, PRODA/B2G software and provider systems, which affect efficiency, provider payment, participant statements and community confidence.

For example, participant statements are often lengthy - exceeding 10 pages of data and description listing transactions and balances from several accounts. They are complex and focused on past activity. However, providers report that many participants would prefer clearer visibility of their current budget account balances, remaining funds and what this means for future services. Care partners are spending significant time helping participants and families interpret information on past service use.

Future reforms should treat workforce capacity and digital infrastructure as core requirements for safe, high-quality care. This should include workforce impact and readiness assessments, realistic lead times, simplified administration, reduced duplication, interoperable digital systems, timely error-resolution pathways, clearer claiming and payment rules, and simpler participant statements.

⁴ Aged Care Data and Digital Strategy 2024-2029, Driving better care and leading a sustainable and productive care and support economy, Australian Government; Australian Digital Health Capability Framework 2024, Australian Government.



R2: Improve interoperability and digital capability by:

a) establishing a ‘Digital Capability Fund’ to support software updates, interoperability, automation, and innovation that reduces administrative burden and improves care outcomes; and

b) requiring regulatory roles such as the System Governor under the Aged Care Act 2024 to publish readiness criteria before major policy, digital, claiming or reporting changes commence.

Next steps

Ageing Australia supports productive regulation, transparency and accountability across the aged care sector. However, the current reporting environment creates unnecessary duplication, fragmented systems, inconsistent definitions and increasing administrative costs.

Providers are not seeking reduced accountability. They are seeking a more efficient reporting framework that enables government to obtain accurate and useful information without requiring providers to repeatedly recreate information that already exists. Greater efficiency will enable providers to focus on the delivery of care.

A coordinated approach based on interoperability, common standards, secure data sharing, proportionality and a genuine “tell us once” principle would improve regulatory efficiency while allowing providers to direct more resources towards care, workforce investment, innovation and sustainable service delivery.

We would welcome the opportunity to meet and discuss our submission further. Please contact Anne Liddell, Head of Strategic Policy.

Yours sincerely

Timothy Bowen
General Manager Policy