Submission to the Senate Community Affairs References Committee Inquiry into the Support at Home Program

July 2026

Who Are We?

Meals on Wheels Australia™ (MoWA) is the national peak body representing over 590 individual Meals on Wheels (MoW) outlets that provide meals to around 200,000 older Australians. MoW services represent one of Australia's largest users of voluntary labour, with over 35,000 active volunteers involved in meal delivery and social engagement with older people.

MoW services are primarily funded under the Commonwealth Home Support Program (CHSP), but many receive up to one third of their funding via Support at Home packages. In most cases, MoW services operate as associated providers (sub-contractors) to registered Support at Home providers.

Introduction

Meals on Wheels Australia (MoWA) welcomes the opportunity to contribute to the Senate Community Affairs References Committee's inquiry into the Support at Home (SaH) Program.

The Meals on Wheels service model combines nutrition, social connection and regular welfare checks, preventing deterioration, reducing loneliness, supporting hospital discharge and delaying entry into residential aged care. This preventive role delivers significant value to both older people and the Commonwealth.

MoWA has consistently supported reform that strengthens quality, rights and accountability. However, the experience of the first months of Support at Home demonstrates that important aspects of the program are not operating as intended. Many of the concerns previously raised by Meals on Wheels providers have now been realised in practice.

This submission builds on MoWA's previous Senate submission, subsequent evidence provided to the Committee, recent consultation with members, and the practical experience of Meals on Wheels providers since Support at Home commenced. It also reflects broader concerns regarding the design and implementation of the program.

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Support at Home is creating barriers to essential preventive services

Support at Home was intended to simplify access and improve support for older Australians. The experience of Meals on Wheels providers suggests the opposite has occurred for many older people.

Across MoWA's recent National Conference workshops, providers consistently reported that clients are being incorrectly told they cannot continue using Meals on Wheels once they enter Support at Home. More than half of workshop participants identified this as their single biggest implementation problem. Members also identified assessment delays, affordability concerns, complex service agreements and administrative requirements as major barriers to service delivery.

Perhaps most concerning is that the greatest challenge identified by providers is now the front door of the aged care system itself. Assessment, eligibility determination and referral processes are delaying access to one of the lowest-risk and highest-value services available to older Australians.

For nutrition services, delays matter. Older people cannot postpone eating while administrative processes are completed. Every unnecessary assessment delay increases the risk of malnutrition, social isolation, hospital presentation and avoidable deterioration.

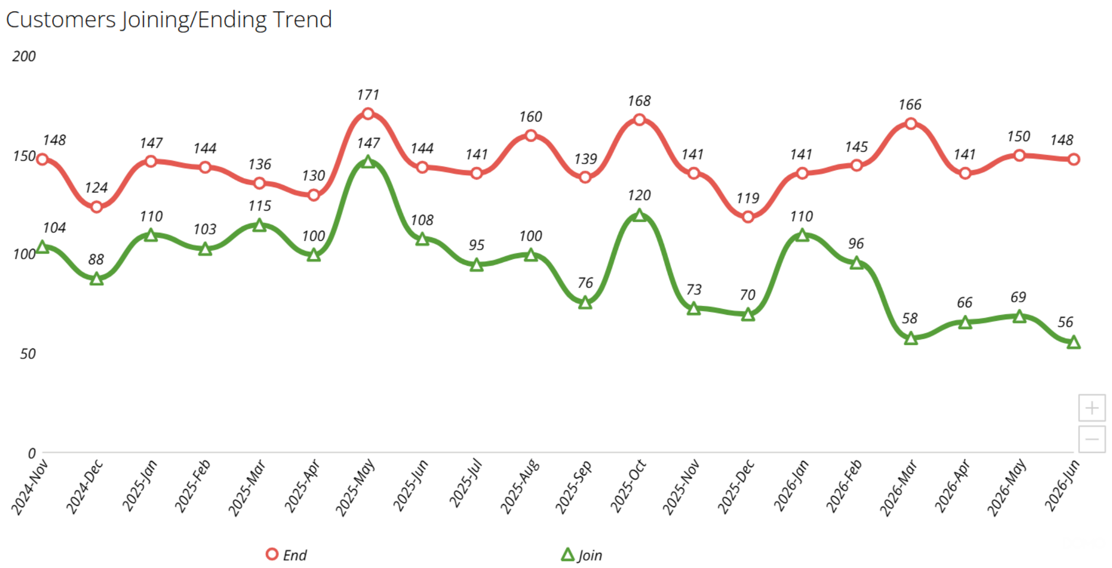
Impact of Support at Home on Meals on Wheels SA

The largest MoW provider in Australia is Meals on Wheels South Australia. MoW SA has seen a marked reduction in new Support at Home participants starting services from March – June 2026, while the number of existing HCP/SAH customers whose services ended remained relatively stable. Those ending services would almost certainly have had “no worse off” provisions.

	Delivered meals			
	Feb-Jun 2025	Feb - Jun 2026		% change
CHSP	230061	275433		19.7%
HCP/SAH	195446	193444		-1.0%
	Person started services			
	Feb-Jun 2025	Feb - Jun 2026		
CHSP	1743	1642		-5.8%
HCP/SAH	562	345		-38.6%
	Person finished services			
	Feb-Jun 2025	Feb - Jun 2026		
CHSP	1634	1571		-3.9%
HCP/SAH	715	753		5.3%

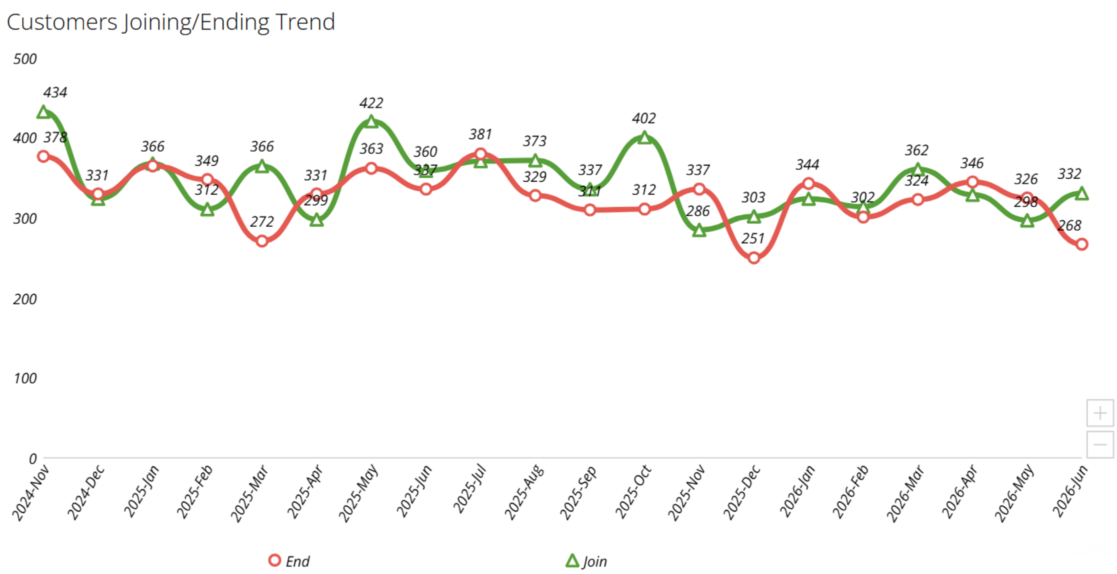
The nearly 39% drop in new SAHP starters in Feb – Jun 2026 compared to the same period a year earlier can only be explained as a direct result of changed policy settings, as the MoW SA service offer, client and package pricing were unchanged since Sept 2025. It's even more concerning when considering the reported increase in packages released, and the increased service utilisation by CHSP clients in the same period.

Home Care Package and Support at Home participant trends for MoW SA, 1/11/2024 – 30/6/2026



We have included what was happening with CHSP clients for comparison. Spikes in new starters in May and October 2025 were partially due to ensuring all clients were assessed and had a MAC ID. The slight downturn in new starters in CHSP since 1/11/25 reflects our contention about the biggest problem being at the assessment front door to the system.

CHSP client trends for MoW SA, 1/11/2024 – 30/6/2026



The assessment model requires review

Experience since implementation suggests that Support at Home's assessment and funding model is fundamentally more complex than necessary for many lower-risk services.

As previously argued by MoWA, and reflected in wider sector commentary, effective care planning has traditionally involved three sequential steps:

- assessment of need;
- identification of appropriate services; and
- determination of the resources required to deliver those services.

Support at Home instead allocates a funding level before detailed service planning occurs. This effectively transforms aged care into an individual funding entitlement scheme rather than a care planning system.

The practical consequences are now becoming evident. Clients experience lengthy assessment processes before accessing relatively simple supports. Providers receive funding decisions without sufficient service-level planning. Older people must then attempt to purchase services within predetermined budgets that may bear little relationship to the services actually required.

This creates inefficiency for providers while increasing confusion for clients and families. For low-risk preventive supports such as meals, a far simpler pathway should be adopted through direct referral, provider assessment and rapid commencement of services.

Support at Home is increasing costs rather than reducing them

One of the central objectives of reform should be improving value for taxpayers. Current evidence indicates that Support at Home is producing the opposite outcome for community meals.

Evidence provided previously to this Committee (see Attachment) demonstrates that delivering an equivalent Meals on Wheels service through Support at Home costs approximately 40-50 per cent more than under CHSP. This additional cost is largely attributable to individual budget administration, provider management, associated provider arrangements, invoicing, payment processing and other transactional costs rather than improved client outcomes.

Illustrative examples provided by Meals on Wheels services show that Commonwealth expenditure for the same meal can increase substantially under Support at Home, while clients may also face higher out-of-pocket costs through provider charging arrangements.

This represents poor public policy. Higher administrative expenditure should only be accepted where it delivers demonstrably better outcomes. In the case of community meals, there is currently little evidence that Support at Home delivers better nutrition, greater independence or improved client experience compared with the existing CHSP model.

MoWA has previously contended that there were foreseeable consequences of categorising meal services in the Support at Home Everyday Living category with its co-contribution rate of 17.5% (for full Aged Pensioners) up to 80% (for self-funded retirees) of the service cost in addition to total food cost. The new and high means-tested co-contribution rates, coupled with no capping on total co-contributions, has predictably resulted in people forgoing meal services entirely, or markedly reducing their service usage below levels of need, creating continued risk of under-nutrition. Anecdotally, this is also resulting in people with higher needs lingering in CHSP where the co-contribution is lower.

MoWA believes meal services belong in the Independence category and its lower means-tested co-contribution band rather than in the Everyday Living category.

Interim funding allocations are unjustifiable

It is inexplicable why the policy decision to allocate only 60% of the individual's budget in the initial 6 – 17 weeks was taken, given it is well known that older people will benefit from rapid access to prevent unnecessary deterioration of their condition.

Allocation of interim funding, combined with the marked-up unit price charged by Support at Home providers to cover their costs plus margin, means people are required to transition from CHSP to Support at Home at a reduced level of support than they had been receiving under CHSP and at less than their assessed level of need. It also means that individuals are cancelling or reducing meal support to ensure there are enough funds for clinical and independence category services.

Client choice is not functioning as intended

The Aged Care Act places significant emphasis on choice and supported decision-making.

The experience of Meals on Wheels providers suggests these principles are not consistently being realised. Providers reported widespread examples of clients being advised they cannot retain Meals on Wheels once entering Support at Home, or that package providers are directing participants towards preferred suppliers rather than enabling genuine consumer choice. This undermines both the intent of the legislation and the practical operation of a competitive provider market.

The Commonwealth should provide nationally consistent guidance confirming that older people remain free to choose Meals on Wheels where it represents their preferred provider and where it meets their assessed needs.

Administrative burden is reducing client care

Meals on Wheels providers consistently report that administrative obligations under the new Aged Care Act, Support at Home and CHSP are disproportionate to the relatively low-risk nature of community meals.

Conference participants identified paperwork, service agreements, associated provider arrangements, GPMS requirements, DEX reporting, My Aged Care identifiers and uncertainty regarding regulatory obligations as consuming increasing amounts of staff time.

Every additional administrative requirement diverts resources away from meal production, volunteer coordination and direct client support.

Small community organisations operating largely through volunteers cannot simply absorb these additional compliance costs. Many providers are now questioning their long-term sustainability under the current operating model.

The Committee should carefully examine whether the current regulatory settings are proportionate to the risks associated with community nutrition services.

CHSP remains essential

The practical experience of the past year reinforces the importance of retaining CHSP as a separate program.

CHSP performs functions that Support at Home is not designed to perform effectively:

- rapid intervention before needs escalate;
- low-intensity preventive supports;
- bridging support while people await more comprehensive care;
- community-based services operating in thin markets;
- volunteer-supported delivery models;
- predictable block funding that supports service continuity.

Meals on Wheels providers increasingly report supporting clients whose needs exceed the original intent of CHSP because Support at Home services remain unavailable or delayed.

Rather than viewing CHSP as a temporary legacy program awaiting closure (as evident from the paltry recent level of program indexation of 2.3% when inflation is over 4% announced earlier in July), Government should recognise it as Australia's primary preventive aged care tier, as argued by the CHSP Alliance. Strengthening CHSP would reduce demand for higher-cost Support at Home packages, hospital services and residential aged care.

Thin markets require specific protection

Meals on Wheels frequently represents the only nutrition service available in regional, rural and remote communities. These services depend upon predictable funding, volunteer participation and sufficient client volume to maintain kitchen operations and delivery routes.

Support at Home's individualised funding model increases financial volatility while imposing significantly higher administrative requirements.

Without explicit thin-market protections, many small providers may withdraw from service delivery, leaving vulnerable older Australians with no practical alternative. This risk is particularly acute for First Nations communities, culturally diverse communities and geographically isolated regions.

Recommendations

Meals on Wheels Australia recommends that the Committee recommend the Commonwealth Government:

1. *Retain CHSP as a permanent, separate program operating alongside Support at Home.*
2. *Recognise CHSP as Australia's primary preventive and early intervention aged care program.*
3. *Introduce streamlined assessment and referral pathways for low-risk preventive services, including community meals.*
4. *Limit Support at Home co-contributions to a maximum % of income irrespective of service mix and use, to avoid penalising the frailest people.*
5. *Re-categorise meal services into the Independence category.*
6. *Remove the 60% interim funding allocations and reinstate full funding when a person is first assigned to a Support at Home classification.*
7. *Require nationally consistent advice confirming older people's right to choose Meals on Wheels providers under Support at Home.*
8. *Review Support at Home administrative requirements to ensure regulatory obligations are proportionate to service risk.*
9. *Introduce specific thin-market protections, including base funding and payment certainty for community providers.*
10. *Ensure future funding arrangements properly recognise the economic and social value created by volunteer-supported service delivery.*

Conclusion

The first months of Support at Home provide an opportunity to learn from practical experience rather than remain committed to assumptions made during policy design.

The evidence emerging from Meals on Wheels providers is remarkably consistent. Older people are experiencing greater complexity, longer delays and higher costs. Providers are spending more time on administration and less time supporting clients. Taxpayers are paying more for equivalent services.

These are implementation problems, but they also expose deeper issues in the program's design.

Support at Home should continue to evolve. However, that evolution should build upon the strengths of CHSP rather than replace one of Australia's most successful preventive care programs with a more expensive and administratively complex alternative.

The Committee has an opportunity to recommend practical reforms that preserve rapid access to nutrition support, protect client choice, reduce unnecessary bureaucracy and strengthen the long-term sustainability of community-based aged care. These reforms would benefit older Australians, improve value for public expenditure and preserve the unique contribution that Meals on Wheels continues to make in communities across Australia.

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Attachment

Meals on Wheels Australia

Senate Community Affairs References Committee

Inquiry: Transition of the Commonwealth Home Support Programme (CHSP) to Support at Home (SAH)

Hearing date: Friday, 6 February 2026
Question on notice (Senator Ruston): Unpack the difference between the "actual cost" (taxpayer-funded cost) of Meals on Wheels delivered under CHSP versus Support at Home (regardless of funding mechanism).

Thank you to Senator Anne Ruston for the question on notice regarding the actual cost of Meals on Wheels delivered via CHSP compared with Support at Home (SaH). In the absence of a nationally consistent chart of accounts and data collection across the Meals on Wheels network, the information available is a best estimate based on examples provided by individual services. That said, **we are confident in concluding that the actual cost of Meals on Wheels delivered via SaH is at least 40% to 50% higher than CHSP for an equivalent meal**. There is some variation due to local factors (including geography and delivery model), and examples to illustrate these differences are included in the Appendix.

MoWA notes that the indicative pricing benchmarks also show a higher expected price under SAH compared with CHSP. The CHSP indicative price range for meal-related services is \$9.59 - \$15.86, whereas the Support at Home indicative price is \$15, with a reported indicative range of \$11 - \$22. The indicative benchmarks suggest Support at Home pricing is higher than CHSP for delivered meals.

In summary, under CHSP, meals are delivered through a lower-cost community model supported by Commonwealth subsidy and local client contributions. Under SaH funded arrangements, meals are typically sold at or near full cost through SAH provider invoicing and associated provider agreements, which results in higher per-meal pricing for the same service outcome.

Impacts and urgency

Meals on Wheels Australia (MoWA) also wishes to emphasise that merging CHSP into SaH would place a significant number of Meals on Wheels services at risk of non-viability. With approximately 590 independently run community services, many small, volunteer-led and operating in thin markets, shifting to the administrative and financial settings of SaH would likely cause some services to reduce coverage or close. The impact would be felt nationally, but disproportionately in rural, remote and other vulnerable communities where there are limited alternatives.

MOWA further stresses that a decision on CHSP's future is urgently required. Ongoing uncertainty is driving anxiety among older clients who depend of Meals on Wheels and increasing distress and frustration among staff and volunteers. CHSP services including Meals on Wheels have been neglected and devalued over the past decade; further delay risks reinforcing a perception that these essential preventive supports are not valued.

Appendix:

Illustrative example 1 - Bega Valley Meals on Wheels (regional/rural NSW)

Bega Valley Meals on Wheels provided the following example for a meal comprising of soup, main and sweet. For the purposes of responding to the Committee's question about taxpayer funded cost, MoWA compares the Commonwealth-funded component under CHSP with an illustrative Support at Home (SaH) scenario, using Bega's figures and a transparent assumption about participant contributions under SaH.

Figures provided by Bega Valley Meals on Wheels:

- CHSP Commonwealth subsidy: $15.74 per meal (includes remote area subsidy/loading)
- SaH price charged to a package provider (full cost): $33.10 per meal
- Illustrative SaH participant contribution (full pensioner rate): $5.79 (17.5% of $33.10)
- Note: Meals are categorised as Everyday Living under SaH, so participant contributions may be higher depending on the person's means assessment (up to 80%)
- Implied Commonwealth component under SaH (illustrative): $27.31 per meal ($33.10 - $5.79)
- Exclusive of the 10% administration fee that SAH providers charge in addition

Table 1: Commonwealth component (same meal)

Item	CHSP	SAH (illustrative)
Full price (3 course meal) used in example		$33.10
Client contribution used in example (17.5% full pensioner rate)		$5.79
Commonwealth funded component	$15.74	$27.31
Difference (SAH - CHSP)		+$11.57 per meal

On this example, the Commonwealth-funded component under Support at Home is $11.57 higher per meal than the CHSP subsidy for the same meal (approximately 73% higher than $15.74).

Table 2: Scaled impact (Bega Valley Meals on Wheels example)

Volume	CHSP Commonwealth Cost ($15.74/meal)	SAH Commonwealth Cost ($27.31/meal)	Additional cost to Commonwealth under SAH
100 meals	$1,574	$2,731	$1,157
20,000 meals	$314,800	$546,200	**$231,400**

Illustrative example 2 - Blayney Meals on Wheels (NSW)

Blayney Meals on Wheels provided the following example for a meal comprising soup and main.

For the purposes of responding to the Committee's question about taxpayer-funded cost, MoWA sets out the CHSP unit amount alongside the price charged to Support at Home (SaH) package providers for an equivalent soup and main outcome. MoWA also notes Blayney's advice regarding SaH provider on-charging practices, where meals may be itemised and charged separately.

Blayney Meals on Wheels figures provided

- CHSP unit cost (soup + main): $14.00
- Price charged to SaH providers (soup + main): $26.00
- SaH provider on-charging observed by Blayney: meals being sold as separate units at approximately $20–$22 per unit, varying by SaH provider.

Table 1: Blayney MoW comparison (soup + main)

Item	Amount
CHSP (soup + main)	$14.00
Blayney price to SaH provider (soup + main)	$26.00
SaH provider on-sell (itemised)	$20 - $22 per unit
SaH on-sell for soup + main (2 units)	$40 - $44

Illustrative example 3 - Biloela Meals on Wheels (QLD)

Biloela Meals on Wheels provided the following information for Meals on Wheels delivered under CHSP and under a Support at Home-style associated provider agreement arrangement.

For the purposes of responding to the Committee's question about taxpayer-funded cost, MoWA sets out what is known from the local information provided, noting that the CHSP Commonwealth subsidy amount was not provided (only that it is the "lowest/base rate" for meals). Accordingly, this example is primarily useful to illustrate pricing structure and on charging under package funded arrangements, rather than a like for like Commonwealth component calculation.

Biloela Meals on Wheels figures provided

CHSP (Biloela)

- Client contribution: $10.20
- CHSP subsidy: "lowest (base rate) CHSP subsidy for meals" *(amount not provided)*

Support at Home-style arrangement (associated provider agreement)

- Client pays to Meals on Wheels (raw food component): $5.75
- Package provider invoiced by Meals on Wheels: $13.42 per meal (ex GST)
- Package provider on-charges to the client ([redacted] invoice extract): $14.76 per meal

Table 1: Pricing structure comparison (Biloela MoW example)

Item	**CHSP**	**SAH (illustrative)**
Amount paid by client to Meals on Wheels	$10.20	$5.75 (raw food component)
Amount invoiced to package provider by Meals on Wheels		$13.42 (ex GST)
Amount on-charged to client by package provider [redacted]		$14.76 per meal
CHSP Commonwealth subsidy	"base/lowest rate" *(not provided)*	n/a

Notes on interpretation

- Under the **associated provider agreement**, the Meals on Wheels service receives payment through a **split arrangement** (raw food component paid by the client + provider invoice), and the package provider may then **on-charge** a separate amount to the client.
- This example illustrates that **what the client sees on a package provider invoice may differ** from what the Meals on Wheels service receives for the meal (and may reflect additional costs or pricing settings applied by the package provider).
- A direct comparison of the **taxpayer-funded component** between CHSP and SaH cannot be calculated from this example alone without the **CHSP Commonwealth subsidy amount** for Biloela and confirmation of the **SaH participant contribution rate** applying to the individual client.

Illustrative example 4 - Ballarat Meals on Wheels (VIC)

Ballarat MoW provided information on meal pricing under a Support at Home-style provider arrangement and an associated provider agreement / HCP-style pricing schedule. The key feature of this example is that meals may be charged as separate line items per component (e.g., soup, dessert, sandwich, main), which can materially affect total cost for multi-course meals.

Ballarat MoW figures provided:

Support at Home provider (Ballarat)

- SaH provider charge: $18 per item listed on the invoice (e.g., soup, dessert, sandwich, main meal).

Associated provider agreement / HCP-style pricing schedule (as provided)

- The schedule below shows a split charging model between client “raw food” and provider invoice amounts (ex GST).
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Table 1: SaH pricing approach – Ballarat Meals on Wheels

Item	**SaH provider charge**
Per item (soup / dessert / sandwich / main)	$18.00

Implication**:** A multi course meal is charged as multiple “items” (e.g., main + soup + dessert), depending on how the service is itemised.

Table 2: Associated provider agreement / HCP-style pricing schedule (Ballarat example)

Funding type	**Main meal only**	**Individual item (dessert / soup / sandwich / fruit)**	**2-piece package (main + soup or dessert)**
SAH	Client (raw food): **$3.75** | Provider: **$11.25 (ex GST)**	Client (raw food): **$5.00** | Provider: **$15.00 (ex GST)**	Client (raw food): **$8.15** | Provider: **$18.15 (ex GST)**

Notes on interpretation

- This example highlights that under SaH-style itemisation, a “meal” may not be charged as a single bundled service; instead it can be billed as multiple components (e.g., **$**18 per item), which can increase total cost for a multi-course outcome.
- The SAH schedule illustrates a different model where costs are split between the client raw food component and the provider invoice amount, with some bundled options (1-piece, 2-piece) and some per-item pricing.