

People with Disabilities WA
Belmont disability hub suite 13
213 Wright Street, Cloverdale WA 6105



7 April 2026

Mr Blair Comley PSM
Secretary of the Department of Health, Disability and Ageing
Australian Government Department of Health, Disability and Ageing
GPO Box 9848, Canberra ACT 2601
GPO Box 9848, PERTH WA 6001
Phone: 1800 020 103 (Freecall) or 02 6289 1555
Attention: Higher Everyday Living Fee team

Dear Mr Comley

Aged Care Higher Everyday Living Fees – HELFs

People with Disabilities WA is grateful for this [opportunity to comment](#) on the Australian Government's new higher everyday living, additional and extra service fees that aged care providers are now able to use in residential accommodation for older Australians, including residents with disability, illness and impairment.

Here [at PwDWA](#) we are the peak disabled people's organisation for Western Australian residents with all types of disability. Our members have disability and we are disability-led, with a staff and board of people with disability. We believe in disability codesign and the [Nothing About Us, Without Us philosophy](#). We are a disability representative organisation for Western Australia's disability community and we firmly believe in having a say on all reforms that affect us, including proposed reforms to aged care services and residential accommodation.

Our membership includes older Australian residents with disability, and our staff and board includes supporters or carers of older residents living with disability in aged care facilities or at home supported by the Australian Government's My Aged Care program.

We are pleased that the new HELF arrangements, which replace the existing and past extra service fee and additional service fee arrangements the people we support, include a range of new protections for residents. Among these protections is the prohibition of making a standing or written HELF agreement as part of the contracted care arrangement made with or by residents when they are signing up to an aged care facility place.

**People with Disabilities WA | Perth north | Perth south |
Belmont | Fremantle | Kalgoorlie-Boulder | Karratha | Peel | Wheatbelt**
www.pwdwa.org

Business Address: Suite 13 Level 2, 213 Wright Street, Cloverdale WA 6105

Mailing Address: PO Box 663, Cloverdale WA 6985

Tel (08) 6243 6948 or 1800 193 331 Email admin@pwdwa.org ABN 36 733 500 946

This separation of arrangements will support the flexible adding or cancelling of agreements when the products or services offered under them are no longer required – rather than what previously happened, where many residents and their supports felt effectively locked into the arrangements for the lifetime of the resident’s stay in an aged care facility.

We acknowledge that the services offered under the HELF fees can include ongoing products or services (such as newspapers, daily cake and coffee, Wi-Fi and TV), fixed term services (such as a term of yoga classes) or one-off services (such as a haircut). Not every product or service will be required forever, so it’s good to have flexibility built into the system to facilitate cancelling unnecessary agreements.

We appreciate the cooling off period of 28 days that applies to both standing and ad hoc HELF arrangements. This enables older Australians with disability to immediately cancel these extra services when it becomes clear they are unused, not required, or not wanted at their current price-point because they do not represent value-for-money at the price set by the facility or aged care provider.

The mandatory annual review of a resident’s need-for-a-service is a good and welcome additional reform. Annual indexation is another fair feature for the HELF agreements.

We encourage the Department of Health, Disability and Ageing to consider other aged care reforms, including a push to stop aged care providers from pressuring older Australians to pay a full Refundable Accommodation Deposit (RAD) on entering aged care – or soon afterwards.

Adults with disability and their supporters should be better supported to choose a Daily Accommodation Payment option that would allow them to keep the resident’s funds in appreciating assets that have better annual compound growth than the corresponding cost of DAP payments they could fund instead with that asset growth. Aged care facilities should be prohibited from choosing RAD residents over DAP ones, in order to preserve the wealth of older Australia residents in care in this ongoing and escalating cost-of-living crisis that is rapidly affecting inflation levels.

The Australian Government should also increase the level of assets older Australians are allowed to have to get a full or partial pension, acknowledging the Aged Care Pension asset limits are well out of date and major reforms to pension eligibility rules are now critically needed.

Yours sincerely

Kat Johns

People with Disabilities WA CEO
7 April 2026

Amanda Ellis

PWdWA Systemic Advocate
7 April 2026