

Information session:

Understanding your Comcare 2025-26 premium



The following questions were asked at the information session on *Understanding your Comcare 2025-26 premium* held on 22 May 2025.

If you have any further questions, contact Premiums@comcare.gov.au or your account manager at EmployerAccountManagement@comcare.gov.au.

1. What is the estimated increase in claims for medical costs since 2020/2021?

Comcare does not publish standalone information/data about the annual increase for medical costs. There has been a consistent upward trend in medical costs, driven by CPI growth and indexed provider fees, and broader health sector inflation.

2. What are the specific factors that contribute to the ACT having the highest insurance premiums in Australia?

Broadly, and as you are hearing through this presentation, premiums reflect the risk of injury occurring in the workplace. Different jurisdictions have different types of workplaces and different types of risks. Information about the different jurisdictions, risk profiles and premiums can be found on the SafeWork Australia webpage: [Comparing workers' compensation in Australia | Safe Work Australia](#)

3. Noting that Comcare remains one of the few long-tail schemes remaining, is there any indication of discussion and/or action for change around influencing other jurisdictions from their current short-tail approach to long-tail schemes?

There is a review of the SRC Act occurring right now ([Public consultation - independent review of the Safety, Rehabilitation & Compensation Act 1988 - Department of Employment and Workplace Relations](#)) and Comcare is engaged in that review, including by making a publicly available submission to that review.

4. Is there information about the statistical case estimate?

We have this document which provides some information about the statistical case estimates [Comcare premiums - Your guide - please refer to page 6 "Forecasting the incurred cost of individual claims"](#).



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5. How does the presumptive legislation relating to cancers affect premium calculations, and how are the costs balanced across impacted agencies?

There is no explicit allowance in the premium model for presumptive legislation relating to cancers.

Regarding *how* presumptive cancers are factored into agency premiums, the experience (for presumptive legislation relating to cancers) is captured within the agency's claim experience data in the premium window. The [Comcare Premium Guide](#) provides an explanation on how claims experience data is treated within the premium window.

6. If one of the common drivers of performance adjustments for premiums include 'claims accepted late', how should entities manage the impacts to their premium if the delays come from the claims process and are not caused by the employer?

Comcare is focused on the effective and efficient delivery of claims management services, which includes timely decision making and timely processing of claim related costs once accepted. Employers should continue to provide claims information to Comcare as promptly as possible.

7. What data is being monitored between the date of incident and the issuing of a section 36(3) notice, particularly in light of the new s36 New Guide changes? What impact have the recent changes had especially with the increased focus on early intervention?

Comcare is monitoring various aspects of the Guide following its commencement, including the time taken from date of injury to the date of the first section 36 assessment. Data measuring timeliness between the date of injury and the first section 36 assessment has always been volatile, and there have been no identifiable trends across the years preceding the commencement of the Guide. As the impacts of the Guide are recent, more data will need to mature before any firm conclusions can be made.

Comcare also notes that a section 36 assessment is not mandatory. It is only required if requested by the employee in writing or if a rehabilitation authority needs to assess an employee's capability of undertaking a rehabilitation program. If medical evidence already exists that suggests that an employee can undertake a section 37 rehabilitation program, a section 36 rehabilitation assessment does not need to occur. The available data suggests that the Guide has had no impact on the timeliness or number of section 37 rehabilitation programs, which is the main support provided to the employee to enable return to health and work.



8. For employers that offer unlimited sick leave, what support is available to ensure that an injured employee lodges a claim for time off work?

If an employee has an accepted workers' compensation claim but is not claiming incapacity payments for time off work, the Claims Manager can advise the employee that they may have an entitlement to compensation for time off work due to their compensable condition, which would therefore mean the employee does not need to access sick leave entitlements. However, importantly, an employee is not under any obligation to claim for time off work, it is a decision that the employee is entitled to make.

9. What are the proposed changes to the definition of 'defining events' for psychological injury under NSW legislation, and what impacts might these have?

As these reforms are specific to the NSW scheme and remain under consideration by the NSW Government. Comcare has not undertaken a detailed assessment and does not hold a formal position on the proposed changes. We continue to monitor developments across jurisdictions to stay informed of emerging policy trends.

Separately, the *Safety, Rehabilitation and Compensation Act 1988* is currently under independent review. Comcare has made a public submission to that process and will consider any legislative changes arising from the review in line with our responsibilities as the national regulator.

10. Given that the provision of 'suitable duties' can drive higher claim costs, is there consideration of an offering of a medical redeployment service to support employees unable to return to their previous duties?

Comcare is continually looking at how we can support employers with the recovery and return to work of their employees.

We are currently working on a proposal to pilot a program in partnership with APS employers, to identify positions within their agencies that could potentially be filled by employees, who have capacity for work but cannot return to their pre-injury employer. APS employers participating in the pilot could then put forward employees who they believe may be suited to the position.

We are in the early ideation phase of the pilot and will be undertaking targeted engagement as we progress the work. If you are interested to learn more, please contact providerframeworksandRTW@comcare.gov.au.

