

Annual Price Review

2021-22
Submission

Disability Intermediaries Australia Ltd.

SUBMISSION BY

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ACKNOWLEDGEMENT OF COUNTRY

Disability Intermediaries Australia respectfully acknowledges Australia's Aboriginal and Torres Strait Islander communities and their rich culture and pays respect to their Elders past, present and emerging. We acknowledge Aboriginal and Torres Strait Islander peoples as Australia's first peoples and as the traditional owners and custodians of the land and water on which we rely.

We recognise and value the ongoing contribution of Aboriginal and Torres Strait Islander peoples and communities to Australian life and how this enriches us. We embrace the spirit of reconciliation, working towards the equality of outcomes and ensuring an equal voice.

ACKNOWLEDGEMENT OF RIGHTS OF PEOPLE WITH A DISABILITY

Disability Intermediaries Australia acknowledges the objectives of the United Nations Convention on the Rights of Persons with Disabilities which affirms that all persons with all types of disabilities must enjoy all human rights and fundamental freedoms.

Disability Intermediaries Australia embraces this Convention as we continue to support choice and control for all Australians with a disability.



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1. EXECUTIVE SUMMARY

Disability Intermediaries Australia Limited (DIA) is pleased to present this submission which sets out a methodology and assumptions of a Cost Model for Plan Management and Support Coordination supports to inform and guide the National Disability Insurance Agency (NDIA) pricing decisions for these supports.

The NDIA has not to date made available a cost model or set of assumptions to support the current price limits and price arrangements for either Plan Management or Support Coordination.

Until now a lack of systematic national data about the operational and cost models for Plan Management and Support Coordination has prevented DIA from identifying the underlying drivers of these differences and whether they reflect underlying differences in the cost of provision across the country.

The development of a comprehensive cost model for Plan Management and Support Coordination has involved the first national collection of information on the drivers and operating parameters for these supports.

DIA invited both its members as well as non-member Plan

Management and Support Coordination providers from the Intermediary sector to complete the DIA 2021-22 Annual Price Review – Pricing and Cost Model Survey.

The survey was constructed into two separate streams, Plan Management and Support Coordination, to identify the underlying market conditions of each of the intermediary supports.

Overall, the data collected confirmed:

- i. Intermediary Service Providers deliver extremely cost-effective services providing exceptional value for money to the NDIS Participants and the Scheme;
- ii. The Intermediaries sector continues to experience gaps in policy and operational scheme direction driven by inconsistent and variable advice from the NDIA about the role, scope and function of Plan Management and Support Coordination;
- iii. Current pricing arrangements and limits are driving providers to focus on efficient service delivery. Intermediary Service Providers are seeking greater pricing focus on workforce capability and capacity to ensure they are able to meet the

increasing demands on attracting, developing and retaining a workforce that is focused on delivering quality and safe services for the participants that they work with, whilst driving continuous improvement; and

- iv. The NDIS is a constantly evolving scheme, resulting in substantial impact on the operating environment of providers in the sector. This constant change and evolution continues to put pressure on providers to be agile and responsive, however the current price limits force a focus on service delivery efficiency over agility and responsiveness.

The data ultimately confirmed that Current Price Settings do not meet all the operating costs incurred by the sector, however with a reasonable and measured adjustment to the price limits these pain points could be resolved.

DIA has collected data at each service level / service offering with over 800 submissions from active Intermediary providers covering:

- All States and Territories across Australia;
- Small, Medium and Large scale Intermediary providers;
- Intermediary providers that deliver services exclusively to particular cohorts of NDIS

participants (such as CALD, Rural and Remote, Aboriginal and Torres Strait Islanders and LGBTIQ+ etc).

To support the Intermediaries sector, DIA has developed Professional Standards of Practice for both Plan Management and Support Coordination which at the time of this submission is with the NDIA and NDIS Quality and Safeguards Commission (NDIA Commission) for comment.

Initial responses from both the NDIA and NDIS Commission have been positive.

This submission and the cost models have been built utilising the DIA developed Professional Standards of Practice to define the role, scope and function of Plan Management and Support Coordination.

This submission has been reviewed and contributed to by the DIA membership and is made on behalf of providers who deliver Plan Management and Support Coordination services to 1 in 3 NDIS Participants (over 160,000 NDIS participants across Australia).

Further organisations have provided Statements of Support adding significant weight behind this submission.

ABOUT DISABILITY INTERMEDIARIES AUSTRALIA

DIA is Australia's peak body for non-government disability intermediary service organisations and practitioners.

Collectively, DIA members deliver Support Coordination and Plan Management services for Australians with all types of disability.

**DIA members deliver
services to 1 in 3 NDIS
Participants across
Australia**

DIA members (providers and practitioners) deliver Support Coordination and Plan Management services to 1 in 3 NDIS Participants, over 160,000 NDIS participants across Australia.

DIA members represent more than 71 per cent market share of the Support Coordination and Plan Management markets.

INTERMEDIARIES

NDIS participants are able to engage highly skilled intermediary supports, Plan Management and Support Coordination, to assist in managing their NDIS budgets and the procurement and coordination of support arrangements with providers.

Intermediary organisations play a critical, and yet often underfunded, role in negotiating support costs with providers, making arrangements for support delivery and providing information and ongoing support to providers regarding the specific needs of their clients, to guide NDIS participants through the complexity of the scheme, to better inform participants and to assist administer where needed, payment arrangements.

**51% of Participants
utilise a Plan Manager**

**43% of Participants are
funded for Support
Coordination**



2. INTRODUCTION

One of the founding principal objectives of the National Disability Insurance Scheme (NDIS) is for people with disability to exercise choice and control over how, and with which providers, they spend their available budgets.

The role of pricing in the NDIS is therefore highly important. Prices, or more precisely participants' choices in response to the prices they face in the market, reflect the preferences and relative values that different participants place on different types of supports.

Prices affect the purchasing power of participants, with higher prices reducing the supports participants can purchase within a given support budget. Prices also affect the total costs of the NDIS and therefore its financial sustainability, and the allocation of resources to the NDIS.

Designed to work as a deregulated market of service providers, the cost of services under the NDIS is one of the most important factors in ensuring value for participants, the correct provision of care, and the long-term viability of the Scheme in supporting Australians with a disability.

The NDIA acts as a steward of the NDIS through imposing regulation and controls on the market as it continues to adapt, until efficient prices can be fully realised, and the correct mix of disability services has been established.

To underpin the price controls of services, generally the NDIA employs a Cost Model which estimates the cost-of-service provision of NDIS services.

DIA notes that the NDIA has not made available such a cost model for Plan Management and Support Coordination services.

As a part of this submission, DIA propose a cost model that considers multiple factors including wage awards, leave and non-billable time, supervision and corporate overheads.

The output of this model is intended to be used to support the 2021-22 Annual Price Review and the price settings moving forward. As such, this DIA proposed Cost Model should form a key component in monitoring and regulating the cost of services under the NDIS, with the aim to maintain and grow supply of services for projected future demand.

2.1. DATA SOURCES AND COVERAGE

The development of the attached cost models involved the first national collection of information on Intermediary operating costs across Australia.

The data forms a position to understand the various service structures and offerings nationally.

The collection and analysis of data has focused on both operating revenues and costs for both Plan Management and Support Coordination.

Both publicly available information and data sourced through engagement with providers has been used in the construction of this submission and cost models.

In most cases, information has been collected directly from providers and unless specifically requested or instructed otherwise, publicly available information or the 'most standard' information available has been used.

Where data was not available, information has been collected directly from providers.

DIA invited both its members as well as non-member Plan Management and Support Coordination providers from the Intermediary sector to complete the DIA 2021-22 Annual Price Review – Pricing and Cost Model Survey (the survey).

The survey could be completed via an online survey platform, via return email or in 1 on 1 sessions with DIA.

DIA collected data from 803 unique submissions (430 Plan Management Submissions and 373 Support Coordination).

The data collected contains over 115,500 individual data points.



3. PLAN MANAGEMENT

Registered Plan Management Providers (RPMP), also known as Financial Intermediaries, play a significant role in assisting participants of the NDIS in achieving quantifiable and positive outcomes whilst building the capacity of participants.

Plan Managers must conduct themselves in a professional manner and champion the social and economic participation and employment of people with a disability.

There are two types of services that a RPMP is able to deliver:

- The financial administration of a participant's plan; and
- Plan and financial management capacity building and training.

RPMPs are engaged by an NDIS participant, and as such RPMPs act at the direction of the Participant. RPMPs are not agents of the NDIA and are not considered as a nominee, or legal decision maker of a NDIS Participant.

Plan Management (Financial Administration)

Plan Management funding applies to registered providers who undertake financial administration of a plan on behalf of a participant. This support is different to other funded supports under the NDIA as it is not a reasonable and necessary support.

This support assists a participant by:

- Giving increased control over plan implementation and utilisation with plan financial assistance;
- Managing and monitoring budgets over the course of the plan;
- Managing NDIS claims and dispersing funds to providers for delivered service;
- Effectively managing problem claims between the NDIA and providers;
- Providing correct information to participants in terms of the appropriateness of support fees and cost;
- Maintaining records and producing regular statements showing the financial position of the plan; and
- Providing access to a wider range of service providers, including non-registered providers whilst remaining in line with the price limits contained within the NDIS Price Guide.

Plan Management (Financial Administration) funding includes both a plan management establishment fee and a monthly administration fee.

The establishment fee is for the initial service provided to a participant in order to establish financial and service arrangements between the participant and the RPMP.

The monthly administration fee is for the delivery of financial administration, processing of invoices (claiming and funds disbursement), monitoring of a participant's plan budget, providing regular information to a participant about their plan spend and remaining budgets, support participants to make informed choices and understand their purchasing decisions.

3.1. PLAN MANAGEMENT RESPONDENT PROFILE

At the time of closing responses to the survey (November 2021), DIA had received 430 individual responses to the Plan Management survey.

The representation of the 430 responses received indicated that of the Plan Management Market, 59% identified as "For Profit", 18% as "Not for Profit", 18% as "Profit for Purpose" whilst 6% did not supply an organisation structure.

Table 1. Plan Management Survey Responses by Organisational Structure

Structure	Number of Responses	Percentage of Responses
For Profit	253	59%
Not for Profit	75	18%
Profit for Purpose	75	18%
Not Stated	25	6%

The respondent's coverage of the States and Territories revealed a relatively even distribution which highlights the national nature of a large proportion of the Plan Management market.

Table 2. Plan Management Survey Responses by Jurisdiction of Participants Served

Responses greater than the 430 responses received as respondents service multiple jurisdictions. Percentage sum greater than 100% due to multiple jurisdiction coverage of respondents.

Jurisdiction of Service	Number of Responses	Percentage of Responses
ACT	62	14%
NSW	76	18%
NT	48	11%
QLD	68	16%
SA	63	15%
TAS	53	12%
VIC	73	17%
WA	53	12%

The respondents were also asked the number of individual participant's that their organisation supports to identify the size of operations within the Plan Management market. The survey respondents classified as "Small" 17%, "Medium" 80% and "Large" 3% of the respondents.

Table 3. Plan Management Responses by Number of Participants Supported

Size by Number of Participants	Number of Responses	Percentage of Responses
Small	73	17%
Medium	341	80%
Large	14	3%

3.2. FINDINGS - PLAN MANAGEMENT

The Plan Management Survey consisted of a series of questions grouped into the following categories:

- 3.2.1. Financial Results
- 3.2.2. Headcount
- 3.2.3. Employment Conditions
- 3.2.4. Pay Conditions
- 3.2.5. Leave and Superannuation Entitlements
- 3.2.6. Allowances
- 3.2.7. Costs
- 3.2.8. Utilisation

3.2.1. FINANCIAL RESULTS – PLAN MANAGEMENT

The survey responses showed that 46% of respondents reported that they made a Loss / Deficit or a Break-Even financial result for the 2020-21 financial year.

Table 4. Plan Management Responses by Financial Result

Financial Result '20-21	Number of Responses	Percentage of Responses
Profit / Surplus	230	54%
Loss / Deficit	131	31%
Break Even	66	15%
Not Provided	1	0%

Further analysis of the financial result data shows that organisations categorised as “Small” and “Medium” have a similar percentage of financial result as each other.

Organisations categorised as “Large” have a much higher percentage of respondents reporting a Profit / Surplus. This clearly indicates the advantage of larger scale organisations that can deliver operational efficiencies through higher levels of investment in technology and infrastructure to drive profitable performance.

Table 5. Percentage of Financial Result by Respondent Organisational Size

Size of Organisation	% Profit / Surplus	% Loss / Deficit	% Break-Even
Small	56%	27%	16%
Medium	52%	32%	16%
Large	86%	14%	0%

The organisational structure showed little differences in terms of financial results from the survey with the percentage of respondents reporting a Profit / Surplus, Loss / Deficit or Break-Even being similar across the three categories.

Table 6. Percentage of Financial Result by Respondents Organisational Structure

Structure	% Profit / Surplus	% Loss / Deficit	% Break-Even
For Profit	57%	29%	14%
Not For Profit	56%	33%	11%
Profit For Purpose	55%	32%	13%

Overall, the survey results showed that just over half of the respondents returned a “Profit / Surplus” for the 2021-22 Financial Year with organisational structure playing no discernible factor in determining the financial outcome.

The survey results indicate that there is a benefit in being an organisation of a “Large” size compared to those of a “Medium” or “Small” size.

This clearly indicates the advantage of larger scale organisations that can deliver operational efficiencies through higher levels of investment in technology and infrastructure to drive profitable performance.

3.2.2. HEADCOUNT – PLAN MANAGEMENT

Survey respondents were asked several questions regarding the number of ‘Participant Facing’ and ‘Supervisor’ employment levels to ascertain what the level of supervision / management is required in the Plan Management setting.

DIA have undertaken to ensure that DIA’s proposed cost model considers headcount in a consistent methodology with NDIA’s ‘Span of Control’. Both ‘Headcount’ and ‘Full Time Equivalent’ questions were asked.

3.2.3. EMPLOYMENT CONDITIONS – PLAN MANAGEMENT

The common reference point in the disability sector for base pay conditions is the Social, Community, Home Care and Disability Services (SCHADS) Award which the NDIA use as a base for the Disability Support Worker Cost (DSW) model across four different levels.

The Plan Management sector continues to move towards both Participant Facing and Supervisory staff being employed under the SCHADS Award, noting that many business support roles for larger Plan Managers do not fit within the SCHADS award with employees in these likely to continue to remain on other awards or contractual arrangements.

Table 7. Percentage of Respondents by Award / Agreement – Participant Facing

Award / Agreement	% of Respondents	% Shift in the past 18 months
SCHADS	29%	▲ 12%
Clerks	31%	▼ 6%
Other	30%	▼ 3%
Banking, Finance and Insurance	6%	▼ 3%

This trend towards the SCHADS award is also evident for Supervisory staff with over a third of respondents indicating that supervisory staff are employed under the SCHADS Award, see table 8.

Table 8. Percentage of Respondents by Award / Agreement – Supervisory Staff

Award / Agreement	% of Respondents	% Shift in the past 18 months
SCHADS	35%	▲ 14%
Clerks	23%	▼ 7%
Not Applicable	24%	▼ 3%
Other	18%	▼ 2%
Banking, Finance and Insurance	6%	▼ 2%

3.2.4. PAY CONDITIONS – PLAN MANAGEMENT

The survey asked respondents to indicate base levels of pay for both 'Participant Facing' and 'Supervisory' workers with answers being provided in bands of \$5 dollar increments with the first band being 'up to \$30'. These bands can be mapped to pay levels as set out in the SCHADS Award.

The survey found that, across all respondents, the base level of pay for 'Participant Facing' workers is predominately below \$39 per hour (30% between \$30 to \$34 and 35% between \$35 to \$39).

A further 13% of responses indicated base pay between \$40 to \$44 whilst bands \$45 to \$49 and \$50 to \$54 each received 9% of the survey's responses.

Table 9. Percentage of Per Hour Base Pay by Band – Participant Facing

Base Pay Band (\$)	Percentage of Responses
\$30 to \$34 per hour	30%
\$35 to \$39 per hour	35%
\$40 to \$44 per hour	13%
\$45 to \$49 per hour	9%
\$50 to \$54 per hour	9%
Above \$54 per hour	4%

These results were consistent across Small, Medium and Large sized organisations responses as Table 10 shows.

Table 10. Percentage of Per Hour Base Pay by Band – Participant Facing

Size	\$30 to \$34 per hour	\$35 to \$39 per hour	\$40 to \$44 per hour	\$45 to \$49 per hour	\$50 to \$54 per hour	Above \$54 per hour
Small	32%	31%	14%	7%	12%	5%
Medium	30%	35%	13%	9%	8%	4%
Large	33%	33%	14%	14%	5%	0%

When viewed by organisational structure, it is noticeable that ‘Not For Profit’ organisations have a higher proportion of workers in the lowest band of base pay.

This is not a surprising result given the financial conditions and motivations that ‘Not For Profits’ operate under. ‘For Profit’ and ‘Profit For Purpose’ organisations have a similar distribution of base pay rates as each other.

Table 11. Percentage of Per Hour Base Pay by Organisational Structure – Participant Facing

Structure	\$30 to \$34 per hour	\$35 to \$39 per hour	\$40 to \$44 per hour	\$45 to \$49 per hour	\$50 to \$54 per hour	Above \$54 per hour
For Profit	23%	38%	16%	8%	8%	8%
Not For Profit	60%	20%	0%	20%	0%	0%
Profit For Purpose	25%	50%	0%	0%	25%	0%

SCHADS Level 3.4, at a rate of \$34.90 per hour, is therefore the most appropriate as the Plan Management ‘Participant Facing’ industry benchmark base rate of pay.

For ‘Supervisory’ staff, the survey found that, across all respondents, the spread of base pay levels was wider than those for ‘Participant Facing’ staff.

This would indicate that the breadth and reach of the role of a 'Supervisor' varies across organisations. The spread of base pay levels ranges from \$30 to \$34 at 4% of respondents to between \$65 to \$69 with 6% of respondents.

Table 12. Percentage of Per Hour Base Pay by Band – Supervisors

Base Pay Band (\$)	Percentage of Responses
\$30 to \$34 per hour	4%
\$35 to \$39 per hour	19%
\$40 to \$44 per hour	18%
\$45 to \$49 per hour	26%
\$50 to \$54 per hour	15%
\$55 to \$59 per hour	9%
\$60 to \$64 per hour	4%
\$65 to \$69 per hour	6%

The size of a Plan Management organisations does not appear to impact the base pay rate of Supervisors. Organisations categorised as 'Small' and 'Medium' responded with similar levels of base pay.

'Large' organisations had higher representation in the upper and lower bands, however, did report 26% in the \$40 to \$44 band.

Table 13. Percentage of Per Hour Base Pay by Organisational Structure – Supervisor

Size	\$30 to \$34 per hour	\$35 to \$39 per hour	\$40 to \$44 per hour	\$45 to \$49 per hour	\$50 to \$54 per hour	Above \$54 per hour
Small	2%	16%	20%	29%	14%	18%
Medium	4%	19%	17%	26%	15%	18%
Large	10%	13%	26%	10%	8%	33%

Table 14. Percentage of Per Hour Base Pay by Organisational Structure – Supervisor

Structure	\$30 to \$34 per hour	\$35 to \$39 per hour	\$40 to \$44 per hour	\$45 to \$49 per hour	\$50 to \$54 per hour	Above \$54 per hour
For Profit	6%	26%	17%	17%	24%	11%
Not For Profit	1%	2%	44%	50%	4%	0%
Profit For Purpose	0%	15%	0%	31%	0%	55%

3.2.5. LEAVE AND SUPERANNUATION ENTITLEMENTS – PLAN MANAGEMENT

The survey respondents unanimously responded that leave and superannuation entitlements are accrued and paid in line with workplace regulations.

Table 15. Leave and Superannuation Entitlements

Entitlement	Quantity
Annual Leave	4 Weeks (FT - 152 Hours)
Personal Leave	10 Days (FT - 76 Hours)
Superannuation	Statutory Rate (Currently 10%)

3.2.6. ALLOWANCES – PLAN MANAGEMENT

The survey asked if the respondents organisation paid allowances and or fringe benefits to its employees.

A secondary question was asked if allowances and fringe benefits were paid if these allowances and fringe benefits were paid to ‘Participant Facing’ staff and or ‘Supervisory’ staff.

The survey results show that 35% of the organisations paid allowances or fringe benefits whilst 59% answered they did not. 6% of the survey’s respondents did not provide an answer.

Table 16. Percentage of Organisation Paying Allowances / Fringe Benefits

Allowances / Fringe Benefits	Percentage of All Respondents
Yes	35%
No	59%
No Response	6%

Of those organisations who pay allowances or fringe benefits to Supervisory staff, 80% also pay allowances and or fringe benefits to Participant Facing staff.

Table 17. Allowances Offered to Supervisory and Participant Facing Staff

Employee Category	Percentage of All Respondents
Supervisory	100%
Participant Facing	80%

Vehicle, travel and telephone expenses were the most commonly paid allowances.

Table 18. Percentage of Allowances / Fringe Benefits by Type

Allowance / Fringe Benefit Type	Percentage Offered
Meal	8%
Telephone	15%
Travel	15%
Vehicle	23%
Not For Profit Allowance	15%
Other	23%

3.2.7. COSTS – PLAN MANAGEMENT

The survey asked for total expenses and a more detailed breakdown of overhead costs. Not surprisingly the range of responses was wide given that the costs to the organisations were not exclusively those solely related to the provision of NDIS funded services.

Table 19. Overheads as a Percentage of Direct Costs – All Respondents

Measure	Percentage
Average	79%
Median	67%
Max	139%
Min (non – zero)	8%

The respondents were asked to provide a total revenue amount which was used to determine the profit of the organisation and check against the qualitative answer concerning profit, loss or breakeven.

From the supplied responses, the EBITDA was calculated for each organisation (where sufficient data was provided) and was used to calculate EBITDA to Total Costs.

Table 20. EBITDA as a Percentage of Total Costs – All Respondents

Measure	Percentage
Average	24%
Median	3%
Max	125%
Min (non – zero)	-18%
Below 10%	54%

The survey asked respondents to provide a breakdown of their overhead costs. Administrative costs, including support staff, was the highest cost at an average of 40.7% with 'Other' being the second highest at an average of 22.4%. IT represented, on average, 16.8% of overhead costs whilst Marketing made up a 6.2%.

Table 21. Share of Overhead Costs by Category – All Respondents

Cost Category	Average (%)	Median (%)
Administrative	40.7%	41.6%
Insurance	2.1%	2.0%
Rent	6.3%	6.3%
Fleet	0.2%	0%
Marketing	6.2%	6.3%
Audit	1.4%	1.3%
Registration	3.2%	1.6%
IT	16.8%	17.1%
Depreciation	0.8%	0%
Interest	0.1%	0%
Other	22.4%	22.5%

The survey results show that organisational structure does not have a significant impact on EBITDA as a percentage of Total Costs.

Table 22. EBITDA as a Percentage of Total Costs by Organisational Structure

Structure	Average	Median	Below 10%
For Profit	25%	4%	54%
Not For Profit	24%	4%	53%
Profit For Purpose	24%	2%	55%

The survey did find a benefit in the size of an organisation in terms of EBITDA percentage of total costs. There is a noticeable advantage in being of a larger size with a higher average and median EBITDA compared to total costs and less of a representation of respondents reporting an EBITDA under 10%.

Table 23. EBITDA as a Percentage of Total Costs by Size

Size	Average	Median	Below 10%
Small	21%	1%	62%
Medium	25%	3%	54%
Large	30%	28%	36%

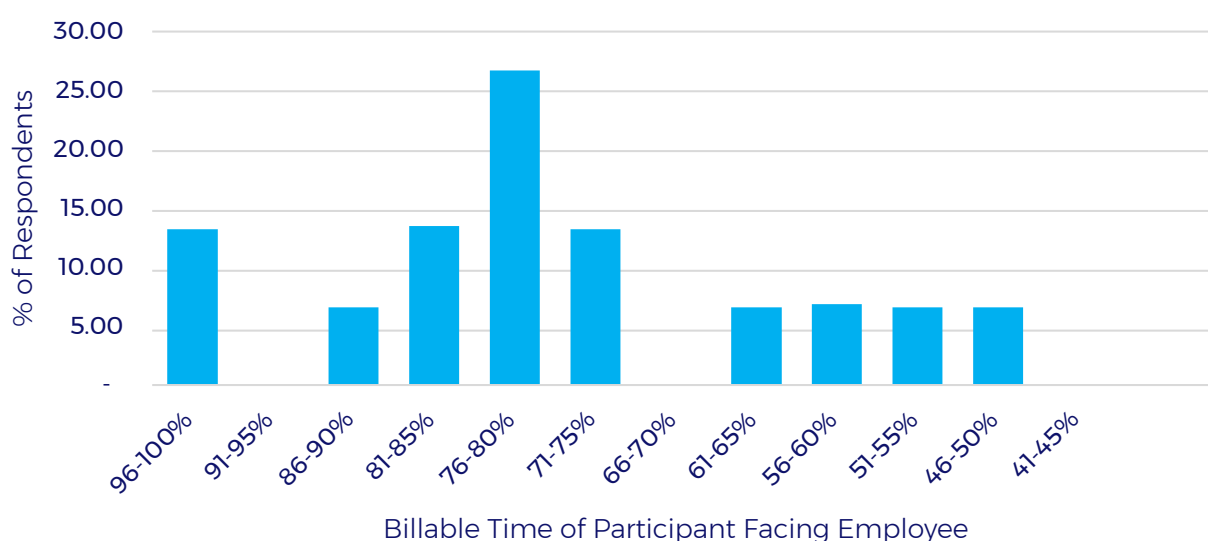
3.2.8. UTILISATION – PLAN MANAGEMENT

It is generally recognised and accepted that not all hours an employee works will be ‘billable time’, especially considering the flat fee nature of Plan Management services.

Each employee is afforded breaks, requires training and performs non-billable tasks as a normal part of their employment. The survey asked for the respondent to provide a breakdown of the utilisation of their participant facing staff.

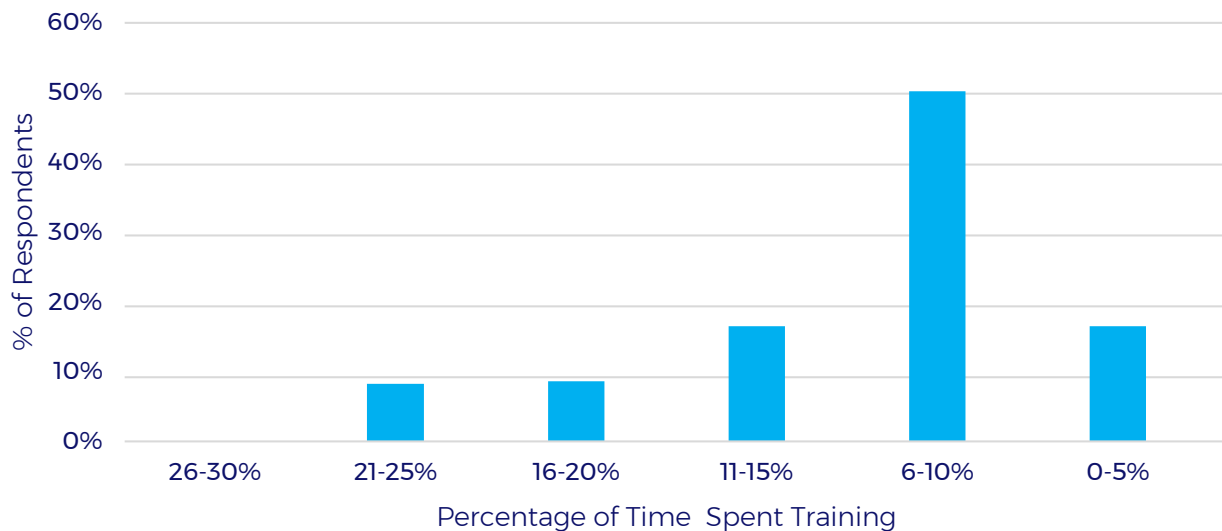
The survey found that across all respondents that the majority of Participant Facing workers have a utilisation rate (the percentage of overall time undertaking billable work) between 75% and 85% as shown in Graph 1 below.

Graph 1. Percentage of Billable Time for Participant Facing Worker – All Respondents

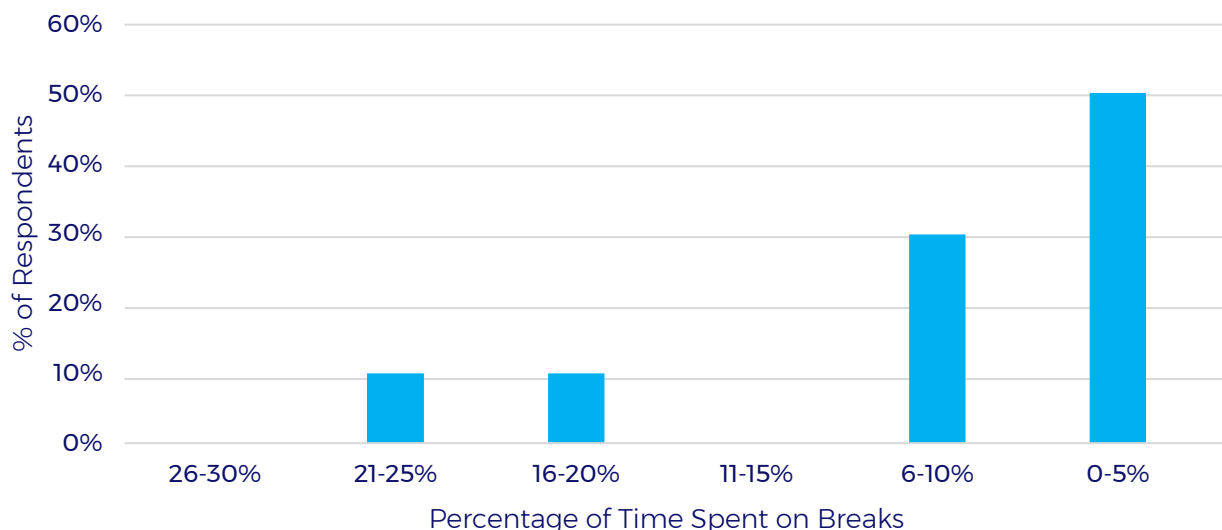


Graphs 2, 3 and 4 show the percentage of time participant facing workers spend on non-billable tasks as per the survey respondents. The results show that Training accounts for between 6% and 10% for half of the survey respondents, Breaks between 0% and 5% whilst General Non-Billable tasks account for between 6% and 10% for over 45% of the survey respondents.

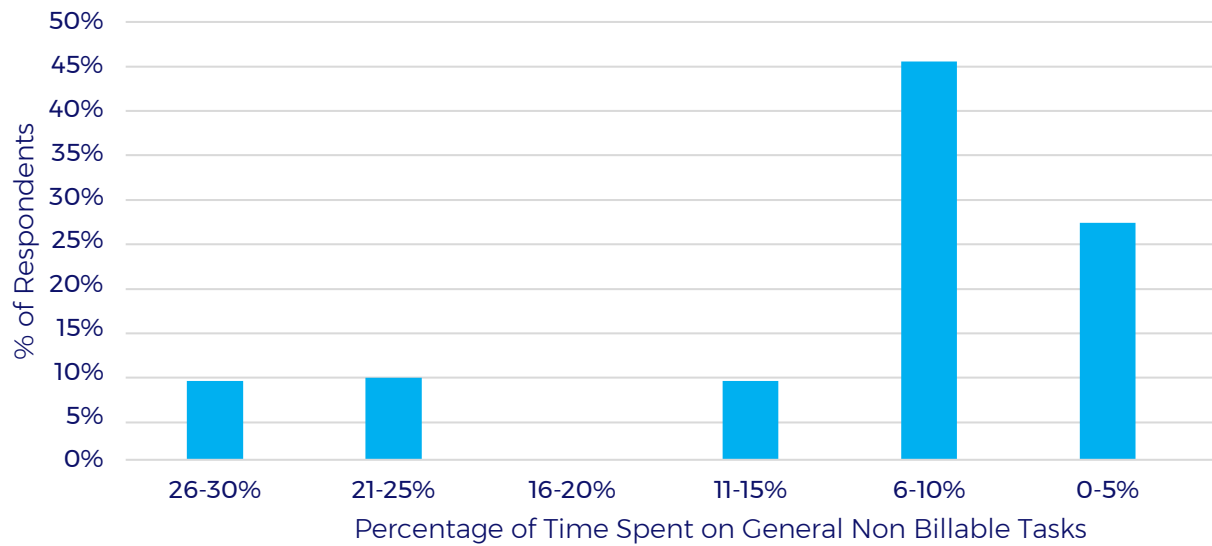
Graph 2. Percentage of Time Spent Training – Participant Facing Workers



Graph 3. Percentage of Time Spent on Breaks – Participant Facing Workers



Graph 4. Percentage of Time Spent on General Non-Billable Tasks – Participant Facing Workers



3.3. PLAN MANAGEMENT MARKET – 2018 TO 2021

DIA has conducted an analysis of the providers registered for Plan Management in the NDIS between two points in time being December 2018 and November 2021.

The ‘Provider List’ from December 2018 had previously been downloaded and kept on file. DIA downloaded a ‘Provider List’ on 18th November using the Registration Group filter ‘Plan Management’ whilst keeping all other fields at the open default setting.

This included the ‘Active within the past 3 months’ filter to align the list with the 2018 file which did not facilitate such refinement at the time.

As providers are listed across all of the States and Territories they provide services in, the provider list files need to be ‘cleaned’ of duplicate entries to identify the true number of individually registered providers of plan management supports.

This was achieved by removing duplicates based on ‘Registered Name’, ‘Address’, ‘Phone Number’ and ‘Email Address’. After removing the duplicates, the number of providers registered to provide ‘Plan Management’ was:

- 1,424 as of December 2018; and
- 1,933 as of November 2021.

Whilst this appears to be a positive indication of market growth on first inspection, analysing the change in number of registered providers between the 2018 and 2021 lists, it is apparent that, although there are now more registered providers, the number who remain from 2018 is less than 50%.

Of the 1,424 registered providers from December 2018 only 682 remain as of November 2021 with 742 not identified via a search on 'Registered Name'.

Whilst the NDIA has focused on the overall number of registered providers and the basic metric of 'new entrants' to promote a flourishing sector, the incredibly high market 'churn' or volatility of registered providers demonstrates the lack of understanding regarding the level of investment required to establish a viable RPMP business.

DIA also notes that unlike other supports and services which were in place under previous State and Territory based disability schemes which continue to see a transition of legacy providers, the plan management service was a new support that was established with the creation of the NDIS.

This further highlights the significance of the 'churn' being seen within the Plan Management market.

Whilst DIA welcomes and champions new entrants into the market, it is apparent that it is difficult for new entrants to compete when pricing is structured for long tail efficiency and not market transition or innovation.

3.4. COST MODEL – PLAN MANAGEMENT

Using the results from the DIA 2021-22 Annual Price Review – Pricing and Cost Model Survey, the May 2021 NDIA Financial Benchmarking Survey and ongoing Intermediary sector engagement, DIA has derived a Cost Model for the delivery of Plan Management support with the NDIS.

The model uses the NDIA DSW Cost Model as its foundation, however, uses data specific to the delivery of the Plan Management supports.

The model is a general representation of the varied Plan Management market with assumptions and settings aiming to provide benchmark levels to determine a transparent price.

Not all providers will meet each benchmark setting, some will be above and some below, however, in general terms, DIA believe that the Cost Model is an accurate representation of the required price to deliver Plan Management under the NDIS in a sustainable fashion.

The Cost Model builds from a base pay rate adding incremental hourly costs that are incurred in the delivery of the Plan Management supports. The hourly price is then converted to a monthly per participant price in line with the current pricing structure set by the NDIA.

Finally, the current Establishment Fee is amortised over a 12-month period and the subsequent monthly amount is incorporated into the monthly Plan Management price.

3.4.1. BASE PAY – PLAN MANAGEMENT

The Plan Management sector is progressively moving towards higher levels of employees employed under the SCHADS Award with a significant number of recent survey respondents indicating the need to pay above the Clerks Award (if this is being referenced as applicable agreement) to attract staff.

From the data collected (see section 2. Survey Result – Pay Conditions) the most representative base pay bands were \$30 to \$34 and between \$35 and \$39.

These results align with the Level 3.4 pay point of the SCHADS Award which is currently (November 2021) set at \$34.90

Base Rate

Award SCHADS 3.4

Hourly Rate \$34.90

3.4.2. LEAVE ENTITLEMENTS – PLAN MANAGEMENT

The Cost Model assumes that each Participant Facing employee is entitled to:

- 20 days of annual leave;
- 10 days of personal leave; and
- 10 days of Public Holidays (as per the NDIA DSW Cost model rationale).

These leave entitlements and subsequent costs are accrued by the employer for each hour the employee works. The Cost Model accounts for this by adding these entitlements to the base level of pay received by the worker. The Cost Model also assumes the SCHADS weekly hours worked (38) and the number of days worked being 220.

The Cost Model does not include a shift loading as the typical working hours of a Plan Management worker are business hours between Monday and Friday.

Leave		
Cumulative cost per hour before leave (base rate)	\$34.90	
Annual Leave Hours	152	
Per cent of leave taken	100%	
Cost per worked hour per worked hour	\$3.17	
Personal Leave Hours	76	
Per cent of leave taken	100%	
Cost per worked hour per worked hour	\$1.59	
Public Holidays	76	
Per cent of leave taken	100%	
Cost per worked hour per worked hour	\$1.59	
Cumulative Cost		
Cumulative cost per hour after leave costs		\$41.25
Increase from base rate		15%

3.4.3. EMPLOYEE ON COSTS – PLAN MANAGEMENT

Superannuation is added at the statutory minimum. It was found that the payment of Allowances was not widespread in Plan Management so have not been included. Workers Compensation was found to be 2% across the sector.

On Costs

Cumulative cost per hour before on costs	\$41.25
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Superannuation

Superannuation Rate	10%
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Superannuation Cost per worked hour	\$4.12
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Workers Compensation

Premium Rate	2%
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Premium Cost per worked hour	\$0.82
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Allowances

Allowance Rate	Nil
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Allowance Cost per worked hour	Nil
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Cumulative Cost

Cumulative cost per hour after On Costs	\$46.19
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Increase from base rate	24%
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3.4.4. SUPERVISION – PLAN MANAGEMENT

Plan Management workers require supervision, training and guidance from more senior and skilled workers which the Cost Model recognises and incorporates.

The sector indicated, via the DIA survey, that Supervisors are paid within a band that translates to the Level 4.4 SCHADS pay point. Based on DIA analytics and knowledge, the Cost Model assumes that a Supervisor will oversee nine (9) participant facing Plan Management workers.

The Cost Model assumes that Supervisors accrue Leave and On Costs on the same basis as the Participant Facing workers.

Supervision

Cumulative cost per hour before Supervision	\$46.19
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Supervision

Level (SCHADS Equiv.)	4.4
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Base Pay	\$40.39
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Leave Costs	\$7.34
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On Costs	\$5.73
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Span of Control

Span of Control	9.0
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Cost of Supervision per worked hour	\$5.94
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Cumulative Cost

Cumulative cost per hour after Supervision costs	\$52.14
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Increase from base rate	33%
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3.4.5. UTILISATION – PLAN MANAGEMENT

In addition to mandated breaks afforded under the SCHADS Award, workers undertaking Plan Management require training and will also, in their normal course of employment, spend time on general activities that are not within the scope of the funded NDIA support.

The Cost Model recognises this and with the results from the survey, has set an assumption that a participant facing Plan Management worker would spend 84% of their time delivering NDIA funded support. The remaining time is spent on breaks, in training or other general activities.

Utilisation		
Cumulative cost per hour before Utilisation	\$52.14	
<u>Utilisation</u>		
Breaks	4%	
Training	6%	
Other	6%	
Utilisation Total	84%	
Cost of Utilisation per worked hour	\$8.34	
		Cumulative Cost
Cumulative cost per hour after Utilisation costs		\$60.48
Increase from base rate		42%

3.4.6. OVERHEADS – PLAN MANAGEMENT

The Cost Model assumes that corporate overheads are equal to 18% of direct costs (those costs as set out above).

Overheads			
Cumulative cost per hour before Overheads	\$60.48		
<u>Overheads</u>			
Rent	3%		
Information Tech.	9%		
Audit and Compliance	1%		
Marketing	4%		
Other	1%		
Overheads Total	18%		
Cost of Overheads per worked hour	\$10.89		
		Cumulative Cost	
		Cumulative cost per hour after Overheads	\$71.36
		Increase from base rate	51%

Marketing / Google Ads

In previous NDIA Annual Price Reviews (see 2019) there was commentary by the NDIA around the cost and fees being paid by Plan Managers to advertise their business on platforms such as Google Ads.

An analysis of Google Ad 'Keywords' has shown that 'NDIS plan management' is an actively searched term with online marketing being an important element for attracting participants to a provider. Advertisers pay via a 'Cost per Click' (CPC) methodology with a higher CPC representing a higher conversion rate from a click to a sale of the good on offer which in this instance the provision of Plan Management supports.

DIA's analysis shows that the keyword search 'NDIS plan management' has a CPC of \$11.35. Using applicable conversion rates for each support, 19% for Plan Management (based on research via Google Ad Analytics and the underlying nature of the purchasing decision being made) the cost of obtaining a participant for Plan Management is approximately 4% of the yearly revenue (Monthly Fee and Establishment Fee).

The Overhead assumption in this Cost Models has incorporated such costs.

3.4.7. MARGIN – PLAN MANAGEMENT

A 5% margin has been assumed to reflect the requirement for organisations to be sustainable and to facilitate investment and innovation in providing quality Plan Management to NDIS participants.

Margin

Cumulative cost per hour before Margin \$71.36

Margin

Margin as a share of other costs 5%

Margin Cost per worked hour \$3.57

Cumulative Cost

Cumulative cost per hour after Margin \$74.93

3.4.8. MONTHLY PRICE – PLAN MANAGEMENT

The current pricing structure of the Plan Management support item is a flat monthly fee per participant supported by the RPMP.

For the hourly rate to be converted to a monthly price, an assumption needs to be made with regard to the number of hours a Plan Manager would spend on each participant per month.

The Cost Model has set this assumption at the historical ratio of 1.48. DIA recognise that this rate is an average and does not indicate the hours of service for each individual participant.

By setting a monthly price for this service there is an expectation that Plan Managers will engage some participants for less than 1.48 hours and others for more than 1.48 hours. This variation of service hours will be driven by a range of factors, including:

- Volume of disability services being provided to the participant;
- Complexity of the participants support needs;
- Scale of funding within the participants NDIS plan;
- Level of service flexibility the participant is seeking.

Monthly Fee			
Cumulative hourly cost	\$74.93		
Hours of service per month	1.48	Cumulative Monthly Price	
Monthly Price	\$110.90	Cumulative monthly price	\$110.90

3.4.9. SET-UP COSTS – PLAN MANAGEMENT

Over the life of a participants plan, DIA's data indicates that Plan Managers on average spend 4 hours on 'Set-Up' activities. The current Set-Up Costs mechanism of being payable only once per plan creates a number of situations which negatively impact participants including:

1. Where a participant wants to move from one Plan Manager to another mid-plan (exercising choice and control) the receiving Plan Manager cannot claim or recoup the setup costs of onboarding a new participant. This is a significant disincentive for Plan Managers to onboard participant's mid-plan; and
2. Establishment Activities extend beyond just the beginning of a new plan. Throughout the course of a plan a Plan Manager will undertake 'set-up activities based on:
 - a. A participant's choice to use their plan funds flexibly – in line with the NDIA policy;
 - b. Responding to moments of crisis or change in support direction / methodology;
 - c. Participant led and driven trial and error of different supports to meet their needs.

This agility is encouraged and is one of the key benefits for participants utilising Plan Management, however this leads to Plan Managers conducting 'set-up' activities over the course of the plan.

By allocating the set-up costs into the monthly fee this ensures that funding more adequately reflects the workload and service delivered by plan managers regardless of if they are the first or subsequent plan manager.

Further this also has a positive impact on service quality as it becomes more financially viable and beneficial for each plan manager to retain their existing clients rather than seeking to focus on attract new clients at the beginning of their plan.

DIA contends that:

1. At a minimum the Set-Up Costs, be based on 4 hours at this cost models hourly rate; and
2. The Set-Up Fee be amortised over a 12-month period (typical and historical plan duration) and that monthly value added to the monthly price for Plan Management support.

Set-Up Costs	National	Remote	Very Remote
Set-Up Costs – Amortised over 12 equal months	\$24.95	\$34.92	\$37.42

3.5. PLAN MANAGEMENT – PRICE

The Cost Model brings together the cost of the delivery of Plan Management supports and the amortised Establishment Fee to form one simple, easy to understand and transparent price for the delivery of the Plan Management support.

Plan Management

Item Number		National	Remote	Very Remote
14_034_0127_8_3	Plan Management – Monthly Fee			
	A monthly fee for the ongoing delivery of financial management arrangements.	\$110.90	\$155.26	\$166.35
	<i>Set-Up Costs – amortised over 12 months</i>	<i>\$24.95</i>	<i>\$34.92</i>	<i>\$37.42</i>
	Total Monthly Plan Management Fee	\$135.70	\$189.98	\$203.55

The amortising of the ‘Set-Up Fee’, must not be viewed as mutually exclusive with the rest of this Cost Model. In that if the NDIA seeks to not amortise the ‘Set-Up Fee’ then DIA would recommend all other elements of this cost model be accepted, save specifically for the amortisation of the Set-Up Costs.

3.6. VALUE FOR MONEY – PLAN MANAGEMENT

This Plan Management Cost Model presents tremendous value for money for both NDIS participants and the Scheme.

In 2020-21 RPMPs managed approximately \$12.43bn of committed Scheme funds.

For the same period RPMPs billed the Scheme \$337m for their services or just 2.7% of funds under management or 4% of funds claimed.

To compare and contrast adjacent sectors, DIA’s research indicates that in 2020-21:

- Financial Services sector operated at around 14.6%;
- Administration and Support Services sector at around 8.7%;
- Health Care and Social Assistance sector (private) at around 18.0%;
- Administration and Insurance sector (public) at around 8.1%; and
- Professional Services sector operated at around 20.4%.

Source: Australian Bureau of Statistics 2020-21



4. SUPPORT COORDINATION

Support Coordinators, also known as service intermediaries, play a significant role in assisting participants of the NDIS in achieving quantifiable and positive outcomes whilst maintaining and building the capacity of participants. Support Coordinators must conduct themselves in a professional manner and champion the social and economic participation and employment of people with a disability.

Where funded, a Support Coordinator will assist Participants to understand and implement the funded supports in their plan as well as link them to community, mainstream and other government services.

A Support Coordinator will assist Participants to negotiate with providers and assist them to 'optimise' their plan and get the most out of their funded supports.

Support Coordination is a capacity building support under the NDIS. The focus of this support is activities to:

- Assist a Participant to develop their skills, independence and confidence to act on their own and reduce reliance on funded supports over time.
- Assist a Participant to maintain their current levels of capacity through their supports to prevent or reduce loss that would result in increased support needs.

Support Coordination Levels

Level 1

Support Connection

This level of support will assist a Participant to understand their NDIS plan, connect with service providers and support the Participant to establish support to achieve the most out of their plan.

Level 2

Coordination of Supports

This level of support is funded where there is greater complexity in the support environment and/or the Participant's circumstances.

Coordination of supports will assist a Participant to understand their NDIS plan, reduce barriers to engage and maintain supports, design support approaches, establish supports, and monitor the support over the course of their plan to achieve the Participants goals and outcomes.

<u>Level 3</u> Specialist Support Coordination	This level utilises expert or specialist approaches and will be funded in a Participant's plan where a specific high and/or complex support needs or risks that require active specialised management have been identified.
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4.1. SUPPORT COORDINATION RESPONDENT PROFILE

At the time of closing responses to the survey, DIA had received 373 individual responses to the Support Coordination survey. In terms of the survey's representation of the broader Support Coordination market, of the 373 responses received 91% identified as 'For Profit' and 9% as 'Not for Profit'.

Table 24. Support Coordination Survey Responses by Organisational Structure

Structure	Number of Responses	Percentage of Responses
For Profit	339	91%
Not for Profit	34	9%
Profit for Purpose	-	-
Not Stated	-	-

The respondent's coverage of the States and Territories showed a higher proportion of respondents in the three larger jurisdictions (NSW, Victoria and Queensland) which highlights the more local nature of Support Coordination organisations compared to the more national nature of the Plan Management market.

Table 25. Support Coordination Survey Responses by Jurisdiction of Participants Serviced
Responses greater than the 373 responses received as respondents service multiple jurisdictions. Percentage sum greater than 100% due to multiple jurisdiction coverage of respondents.

Jurisdiction of Service	Number of Responses	Percentage of Responses
ACT	30	8%
NSW	137	37%
NT	30	8%
QLD	77	21%
SA	42	11%
TAS	30	8%
VIC	122	33%
WA	31	8%

The respondents were also asked the number of individual participant's that their organisation supports to identify the size of operations within the Support Coordination market. The respondents classified as 'Small' represented 8%, 'Medium' represented 53% and 'Large' represented 39% of the survey.

Table 26. Support Coordination Responses by Number of Participants Supported

Size by Number of Participants	Number of Responses	Percentage of Responses
Small	29	8%
Medium	199	53%
Large	145	39%

4.2. SURVEY RESULTS – SUPPORT COORDINATION

The Support Coordination Survey consisted of series of questions grouped into the following categories:

- 4.2.1. Financial Year
- 4.2.2. Headcount
- 4.2.3. Employment Conditions
- 4.2.4. Pay Conditions
- 4.2.5. Leave and Superannuation Entitlements
- 4.2.6. Allowances
- 4.2.7. Costs
- 4.2.8. Utilisation
- 4.2.9. Staff Retention

4.2.1. FINANCIAL RESULTS – SUPPORT COORDINATION

The survey responses showed that 59% of respondents reported that they made a Loss / Deficit or Break-Even, with only 41% of the respondents reporting a Profit / Surplus.

Table 27. Support Coordination Responses by Financial Result

Financial Result '20-21	Number of Responses	Percentage of Responses
Profit / Surplus	152	41%
Loss / Deficit	74	20%
Break Even	147	39%
Not Provided	-	-

Analysis of the financial results data shows that organisations categorised as 'Small' and 'Medium' have a similar percentage of financial result as each other.

Organisations categorised as 'Large' have a slightly lower percentage of respondents reporting a 'Profit / Surplus' financial result. This indicates that organisations of a larger scale find it more difficult to deliver Support Coordination supports at a profitable level.

Table 28. Percentage of Financial Result by Respondent Organisational Size

Size of Organisation	% Profit / Surplus	% Loss / Deficit	% Break-Even
Small	45%	17%	34%
Medium	42%	19%	40%
Large	39%	21%	40%

The organisational structure showed little differences in terms of financial results from the survey with the percentage of respondents reporting a Profit / Surplus, Loss / Deficit or Break-Even being similar across the two categories.

Table 29. Percentage of Financial Result by Respondents Organisational Structure

Structure	% Profit / Surplus	% Loss / Deficit	% Break-Even
For Profit	40%	20%	40%
Not For Profit	38%	18%	44%
Profit For Purpose	-	-	-

Overall, the survey results showed that only 40% of the respondents returned a 'Profit / Surplus' for the 2021-22 Financial Year with organisational structure playing no discernible factor in determining the financial outcome.

The survey results would indicate that there is a benefit in being an organisation of a 'Small' size compared to those of a 'Medium' or 'Large' size in terms of the number of participants supported.

This is further supported by anecdotal evidence which has been presented for the last 2 years, in which Support Coordination providers have indicated the difficulty in developing and scaling up operations within the current pricing structure.

4.2.2. HEADCOUNT – SUPPORT COORDINATION

Survey respondents were asked several questions regarding the number of ‘Participant Facing’ and ‘Supervisor’ employment levels to ascertain what the level of supervision / management is required in the Support Coordination service setting.

DIA have undertaken to ensure that DIA’s proposed cost model considers headcount in a consistent methodology with NDIA’s ‘Span of Control’.

Both ‘Headcount’ and ‘Full Time Equivalent’ questions were asked.

DIA notes that the supervision and Span of Control model differs significantly based on the level of Support Coordination being delivered.

This is to be expected with greater complexity and clinical focus for the upper level of Support Coordination.

4.2.3. EMPLOYMENT CONDITIONS – SUPPORT COORDINATION

The common reference point in the disability sector for base pay conditions is the Social, Community, Home Care and Disability Services (SCHADS) Award which the NDIA use as a base for the Disability Support Worker Cost (DSW) model across four different levels.

The Support Coordination sector is overwhelmingly dominated by the SCHADS Award for both Participant Facing and Supervisory staff.

Table 30. Percentage of Respondents by Award / Agreement – Participant Facing

Award / Agreement	% of Respondents	% Shift in the past 18 months
SCHADS	89%	▲ 2%
Other	11%	▼ 2%

This trend of SCHADS award is also evident for Supervisory staff with the same results being seen for supervisory staff.

Table 31. Percentage of Respondents by Award / Agreement – Supervisory Staff

Award / Agreement	% of Respondents	% Shift in the past 18 months
SCHADS	89%	▲ 2%
Individual Agreement	5.5%	▲ 1%
Other	5.5%	▼ 2%

4.2.4. PAY CONDITIONS – SUPPORT COORDINATION

The DIA survey asked respondents to indicate base levels of pay for Levels 1, 2 and 3 Support Coordination and ‘Supervisory’ workers with answers being provided in bands of \$5 dollar increments.

The bands can then be mapped to pay levels as set out in the SCHADS Award.

The survey found that, across all respondents, the base level of pay for Level 1 Support Coordinators is predominately between \$35 to \$39 per hour (88%).

The remaining 12% of responses indicated base pay between \$40 and \$44.

Table 32. Percentage of Per Hour Base Pay by Band – Level 1 Support Connection

Base Pay Band (\$)	Percentage of Responses
\$35 to \$39 per hour	88%
\$40 to \$44 per hour	12%
Over \$45 per hour	0%

The base level of pay for Level 2 Support Coordinators is more diverse than Level 1, however 65% of respondents indicated a base pay level between \$40 and \$44.

Table 33. Percentage of Per Hour Base Pay by Band – Level 2 Coordination of Supports

Base Pay Band (\$)	Percentage of Responses
\$40 to \$44 per hour	65%
\$45 to \$49 per hour	21%
\$50 to \$54 per hour	8%
\$55 to \$59 per hour	0%
Over \$60 per hour	6%

The base level of pay for Level 3 Support Coordinators was reported in a range between \$65 and \$79. Close to half of the respondents indicated a base pay level between \$65 and \$69.

Table 34. Percentage of Per Hour Base Pay by Band – Level 3 Specialist Support Coordination

Base Pay Band (\$)	Percentage of Responses
\$65.00 - \$69.00	52%
\$70.00 - \$74.00	41%
\$75.00 - \$79.00	7%

The base level of pay for Supervisors of Support Coordinators was reported in a range between \$45 and \$59. Close to half of the respondents indicated a base pay level between \$50 and \$54.

Table 33. Percentage of Per Hour Base Pay by Band – Support Coordination Supervisors

Base Pay Band (\$)	Percentage of Responses
\$45 to \$49 per hour	16%
\$50 to \$54 per hour	48%
\$55 to \$59 per hour	36%
Over \$60 per hour	0%

The results showed that Level 1 Support Coordinators in Small organisations have a higher proportion of workers in the \$40 to \$44 per hour base pay than Medium and Large sized organisations.

Table 34. Percentage of Per Hour Base Pay by Band – Level 1 Support Connection

Size	\$35 to \$39 per hour	\$40 to \$44 per hour	\$45 to \$49 per hour
Small	80%	20%	-
Medium	87%	13%	-
Large	91%	9%	-

Level 1 Support Coordination per hour base pay is consistent between organisations with a 'For Profit' or 'Not For Profit' structure.

Table 34. Percentage of Per Hour Base Pay by Organisational Structure – Level 1 Support Connection

Structure	\$35 to \$39 per hour	\$40 to \$44 per hour	\$45 to \$49 per hour
For Profit	88%	12%	-
Not For Profit	87%	13%	-

The results showed that Level 2 Support Coordinators are paid a similar per hour base rate across Small, Medium and Large organisations. There is a slightly higher proportion in the \$50 to \$54 band in Large sized organisations compared to Small and Medium organisations.

Table 35. Percentage of Per Hour Base Pay by Organisational Structure – Level 2 Coordination of Supports

Size	\$40 to \$44 per hour	\$45 to \$49 per hour	\$50 to \$54 per hour	\$55 to \$59 per hour	Over \$60 per hour
Small	62%	28%	5%	0%	5%
Medium	65%	21%	7%	0%	7%
Large	65%	20%	11%	0%	4%

Level 2 Support Coordination per hour base pay is consistent between organisations with a 'For Profit' or 'Not For Profit' structure.

Table 36 Percentage of Per Hour Base Pay by Organisational Structure – Level 2 Coordination of Supports

Structure	\$40 to \$44 per hour	\$45 to \$49 per hour	\$50 to \$54 per hour	\$55 to \$59 per hour	Over \$60 per hour
For Profit	65%	20%	9%	0%	6%
Not For Profit	65%	24%	7%	0%	4%

The Survey results showed Small organisations had a higher proportion of Level 3 Support Coordinators in the \$75 to \$79 per hour base pay range than Medium and Large organisations. All of the categories reported 90% of respondents paying between \$65 and \$74 for Level 3 Support Coordinators.

Table 37. Percentage of Per Hour Base Pay by Band – Level 3 Specialist Support Coordination

Size	\$65 to \$69 per hour	\$70 to \$74 per hour	\$75 to \$79 per hour
Small	49%	40%	11%
Medium	51%	41%	7%
Large	54%	41%	4%

The Survey also showed that organisations structured 'For Profit' had a higher proportion of Level 3 Support Coordinators in the \$65 to \$69 per hour base pay range than 'Not For Profit' organisations.

Table 38. Percentage of Per Hour Base Pay by Organisational Structure – Level 3 Specialist Support Coordination

Structure	\$65 to \$69 per hour	\$70 to \$74 per hour	\$75 to \$79 per hour
For Profit	53%	41%	6%
Not For Profit	48%	45%	7%

The per hour base pay rate for Support Coordination Supervisors was consistent across organisational size and structure. Approximately 50% of all respondents paid Supervisors a per hour base rate of between \$50 and \$54.

Table 39. Percentage of Per Hour Base Pay by Organisational Structure – Support Coordination Supervisor

Size	\$45 to \$49 per hour	\$50 to \$54 per hour	\$55 to \$59 per hour	Over \$60 per hour
Small	16%	49%	35%	-
Medium	18%	48%	35%	-
Large	14%	48%	38%	-

Support Coordination Supervisors per hour base pay shows a higher proportion in the \$45 to \$49 band for 'Not For Profit' organisations. There is consistency in the percentage of 'For Profit' or 'Not For Profit' organisations that pay between \$50 and \$54 per hour.

Table 40. Percentage of Per Hour Base Pay by Organisational Structure – Support Coordination Supervisor

Structure	\$45 to \$49 per hour	\$50 to \$54 per hour	\$55 to \$59 per hour	Over \$60 per hour
For Profit	15%	48%	36%	-
Not For Profit	22%	46%	33%	-

Given the results of the DIA Survey and ongoing Intermediary sector consultation, the per hour base pay rates paid by Support Coordination providers to its various workers can be best benchmarked as:

- i. Level 1 – Support Connection: SCHADS Level 3.2 at a rate of \$33.48;
- ii. Level 2 – Coordination of Supports: SCHADS Level 4.4 at a rate of \$40.39; and
- iii. Level 3 – Specialist Support Coordination: SCHADS awards with a per hour base rate of \$65.00 (above SCHADS 8.3).

For 'Supervisory' staff, the corresponding per hourly rates of pay are:

- i. Level 1 – Support Connection Supervisor: SCHADS Level 4.1 at a rate of \$37.54;
- ii. Level 2 – Coordination of Supports Supervisor: SCHADS Level 7.3 at a rate of \$52.86; and
- iii. Level 3 – Specialist Support Coordination Supervisor: SCHADS awards with a per hour base rate of \$75.00 (above SCHADS 8.3), this reflects the higher requirements (typically a Clinical) for Level 3 supervision.

4.2.5. LEAVE AND SUPERANNUATION ENTITLEMENTS – SUPPORT COORDINATION

The survey respondents unanimously responded that leave and superannuation entitlements are accrued and paid in line with workplace regulations.

Table 41. Leave and Superannuation Entitlements

Entitlement	Quantity
Annual Leave	4 Weeks (FT - 152 Hours)
Personal Leave	10 Days (FT - 76 Hours)
Superannuation	Statutory Rate (Currently 10%)

4.2.6. ALLOWANCES – SUPPORT COORDINATION

With regards to Allowances and Fringe Benefits, the survey asked if the respondents organisation paid allowances and or fringe benefits to its employees.

A secondary question was asked if allowances and fringe benefits were paid if these allowances and fringe benefits were paid to Support Coordination staff and or Supervisory staff.

The survey results show that 60% of the organisations paid allowances or fringe benefits whilst 40% answered they did not. Of those organisations who pay allowances or fringe benefits to Supervisory staff, 100% also pay allowances and or fringe benefits to Support Coordination staff. Vehicle, travel and Not For Profit salary sacrifice expenses were the most commonly paid allowances.

Table 42. Percentage of Organisation Paying Allowances / Fringe Benefits

Allowances / Fringe Benefits	Percentage of All Respondents
Yes	60%
No	40%

Table 43. Allowances Offered to Supervisory and Participant Facing Staff

Employee Category	Percentage of All Respondents
Supervisory	100%
Participant Facing	100%

Of the allowances and fringe benefits paid, the Survey found that a Vehicle allowance made up 60% of responses.

Table 44. Percentage of Allowances / Fringe Benefits by Type

Allowance / Fringe Benefit Type	Percentage Offered
Meal	0%
Telephone	0%
Travel	14%
Vehicle	59%
Not For Profit Allowance	14%
Other	14%

4.2.7. COSTS – SUPPORT COORDINATION

The survey asked for total expenses and a more detailed breakdown of overhead costs. Not surprisingly the range of responses was wide given that the costs to the organisations were not exclusively those solely related to the provision of NDIS funded services.

Table 45. Overheads as a Percentage of Direct Costs – All Respondents

Measure	Percentage
Average	27%
Median	26%
Max	94%
Min (non – zero)	10%

The respondents were also asked to provide a total revenue amount which was used to determine the profit of the organisation and check against the qualitative answer concerning profit, loss or breakeven.

From the supplied responses, the EBITDA was calculated for each organisation (where sufficient data was provided) and was used to calculate EBITDA to Total Costs.

Table 46. EBITDA as a Percentage of Total Costs – All Respondents

Measure	Percentage
Average	3%
Median	1%
Max	106%
Min (non – zero)	-23%
Below 3%	60%

The survey asked respondents to provide a breakdown of their overhead costs. Administrative costs, including support staff, was the highest cost at an average of 28% with “Other” being the second highest at an average of 24%. Rent represented, on average, 13% of overhead costs whilst IT made up 10%. Insurance, audit and fleet costs were all reported as being above 5%.

Table 47. Share of Overhead Costs by Category – All Respondents

Cost Category	Average (%)	Median (%)
Administrative	28%	28%
Insurance	7%	7%
Rent	13%	13%
Fleet	5%	5%
Marketing	2%	2%
Audit	7%	6%
Registration	2%	2%
IT	10%	10%
Depreciation	2%	1%
Interest	1%	1%
Other	24%	25%

The survey results show that organisational structure does not have a significant impact on EBITDA as a percentage of Total Costs.

Table 48. EBITDA as a Percentage of Total Costs by Organisational Structure

Structure	Average	Median	Below 10%
For Profit	3%	1%	60%
Not For Profit	3%	1%	62%

The survey did find a benefit in the size of an organisation in terms of EBITDA percentage of total costs. There appears to be a noticeable advantage in being of a smaller size with a higher average EBITDA compared to total costs and less of a representation of respondents reporting an EBITDA under 3%.

Table 49. EBITDA as a Percentage of Total Costs by Size

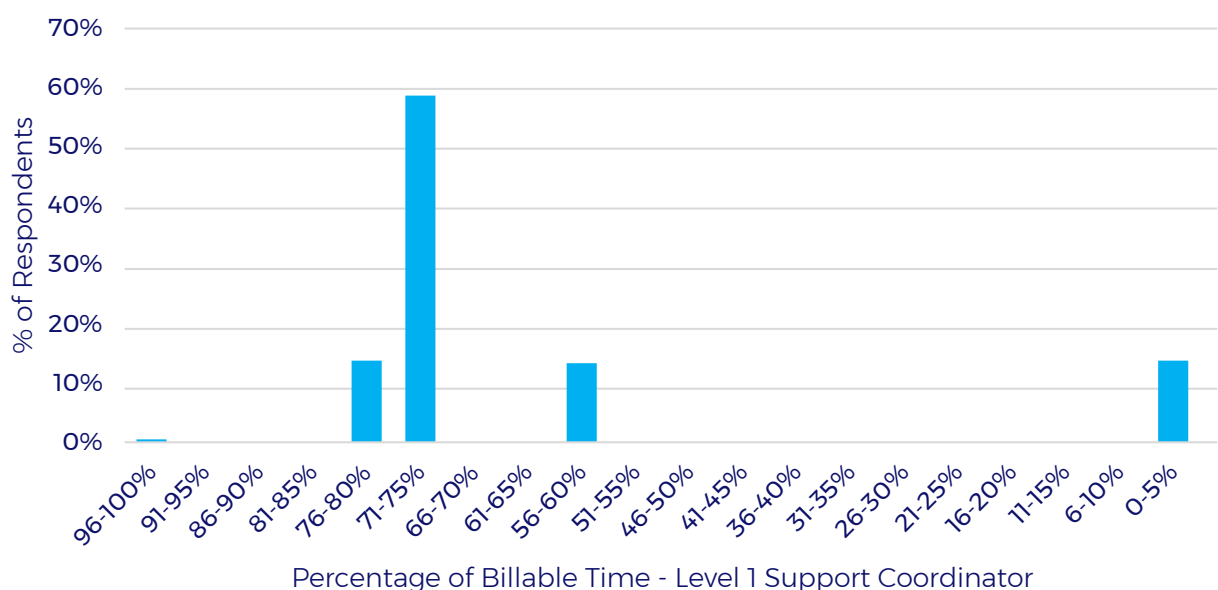
Size	Average	Median	Below 3%
Small	6%	1%	55%
Medium	3%	1%	60%
Large	3%	1%	61%

4.2.8. UTILISATION – SUPPORT COORDINATION

It is generally recognised and accepted that not all hours an employee works will be “billable time”. Each employee is afforded breaks, requires training and performs non-billable tasks as a normal part of their employment. The survey asked for the respondent to provide a breakdown of the utilisation of their participant facing staff.

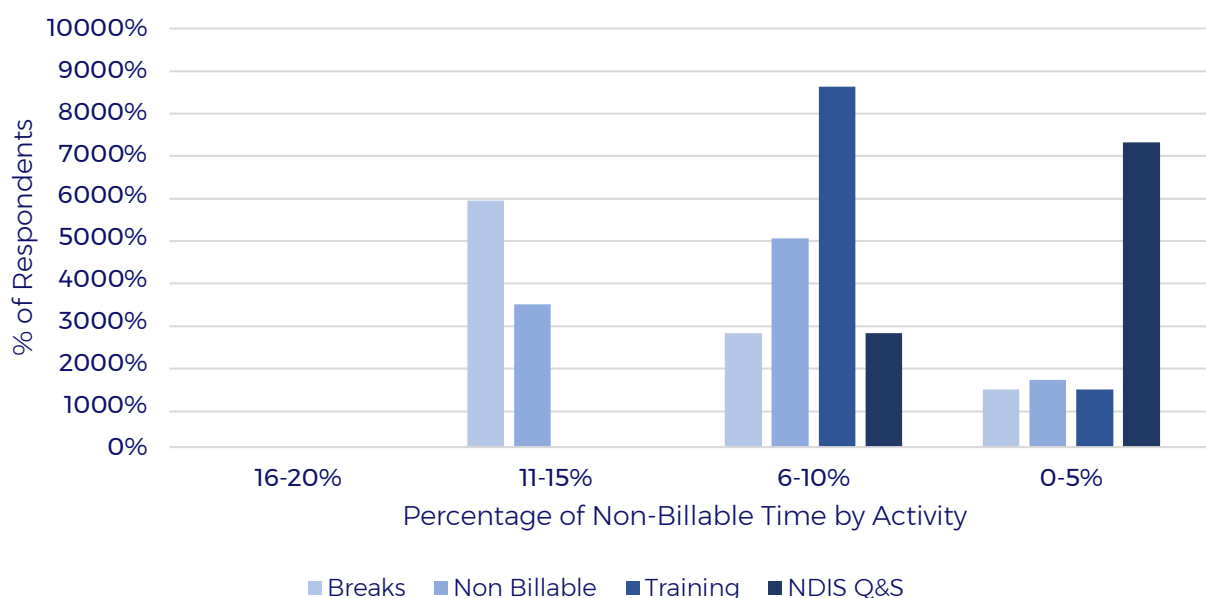
The survey found that across all respondents that the majority of Level 1 Support Coordinators have a utilisation rate (the percentage of overall time undertaking billable work) between 70% and 75% as shown in Graph 5 below.

Graph 5. Percentage of Billable Time for Level 1 Support Connection – All Respondents



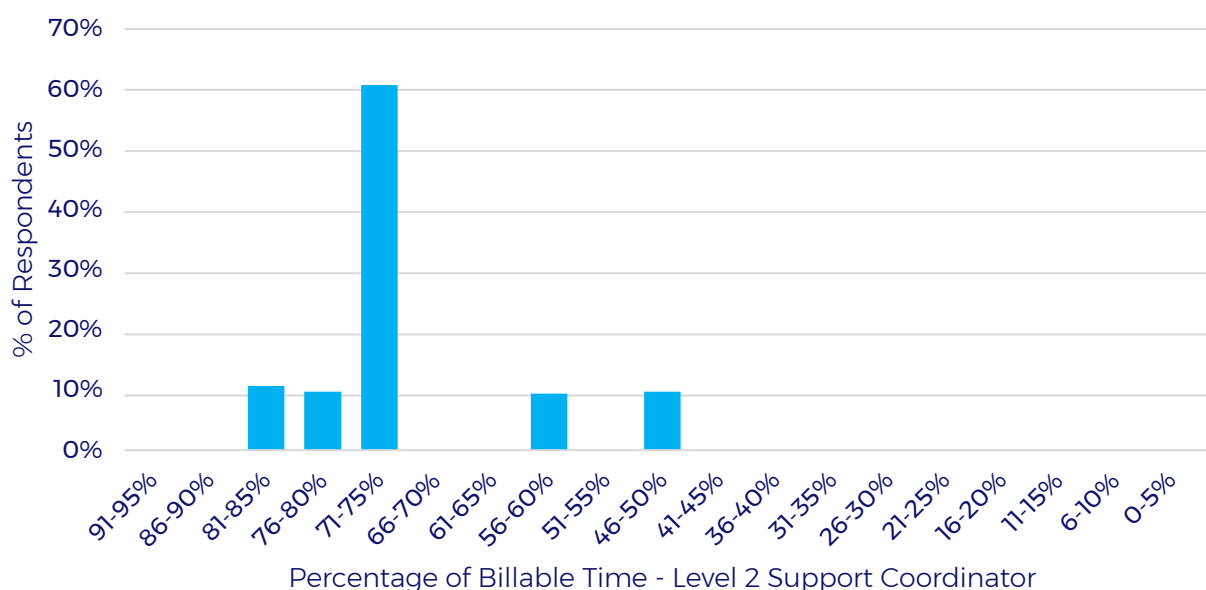
When a Level 1 Support Coordinator is not engaged in billable work, the survey results showed that a majority of respondent's workers spent between 10% and 15% on breaks or non-billable activities, 6% to 10% in training and a further 0% to 5% on NDIS Quality and Safeguard activities.

Graph 6. Percentage of Non-Billable Time for Level 1 Support Coordinators – All Respondents



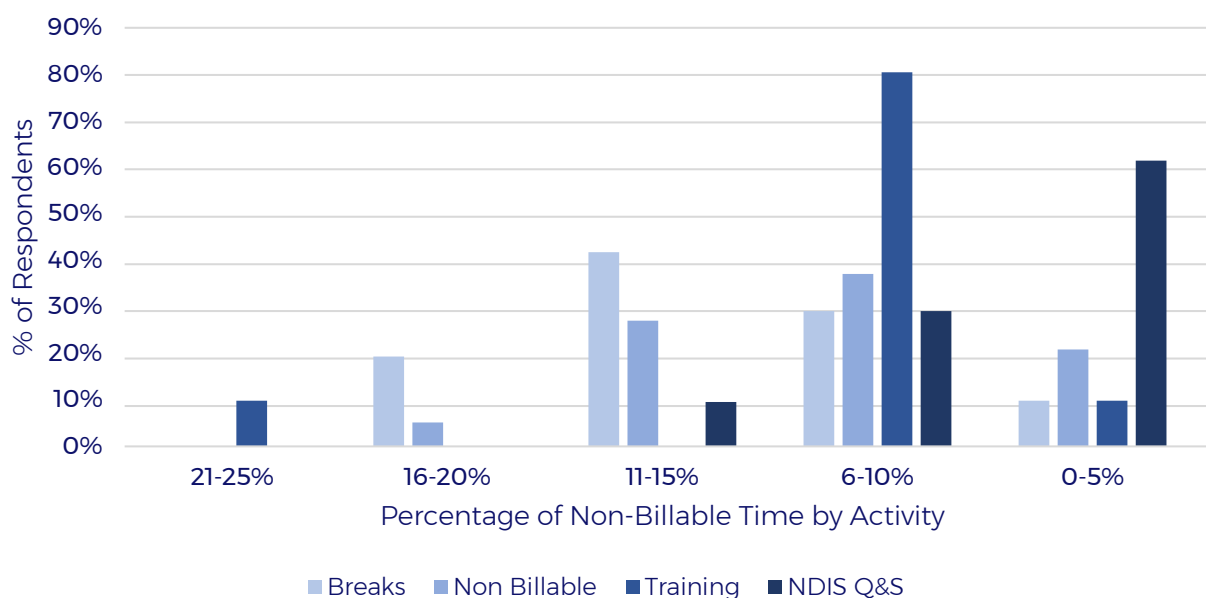
The survey found that for Level 2 Support Coordinators, 60% of the survey's respondents indicated that billable time accounted for 70 to 75% of hours worked.

Graph 7. Percentage of Billable Time for Level 2 Support Coordinators – All Respondents



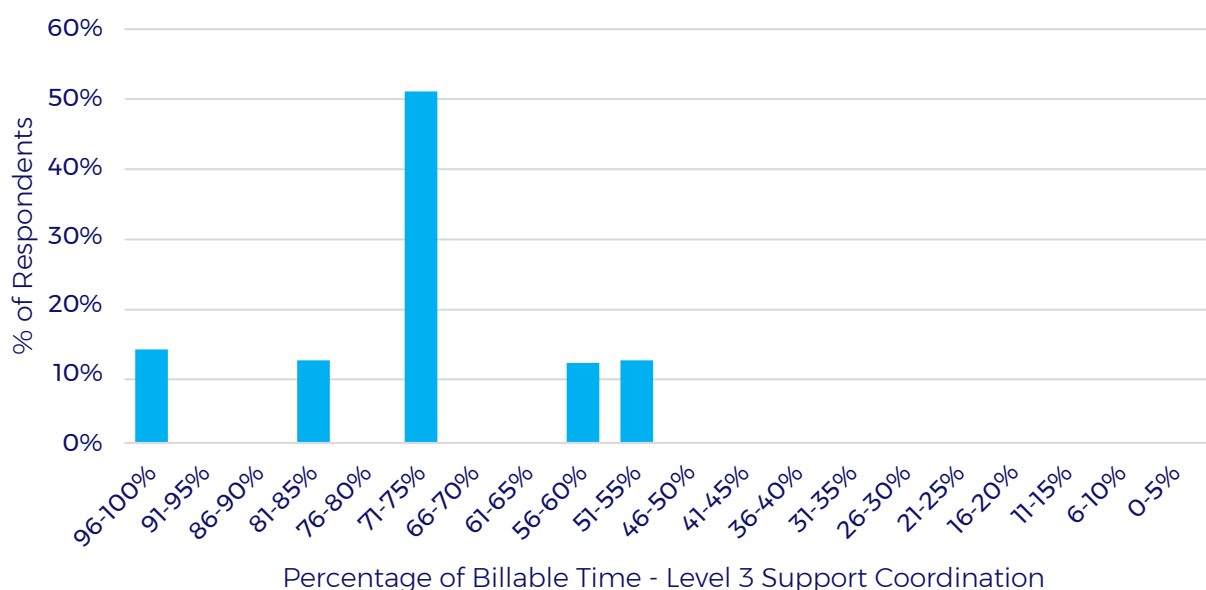
The survey found that for Level 2 Support Coordinators, approximately 40% of all respondents indicated that breaks and non-billable activities accounted for between 11% and 15% of time worked whilst 80% agreed that training accounted for between 6% and 10% of time worked. For 50% of respondent's activities related to the NDIS Quality and Safeguards Commission consumed between 0% and 5% of available time.

Graph 8 Percentage of Non-Billable Time for Level 2 Support Coordinators – All Respondents



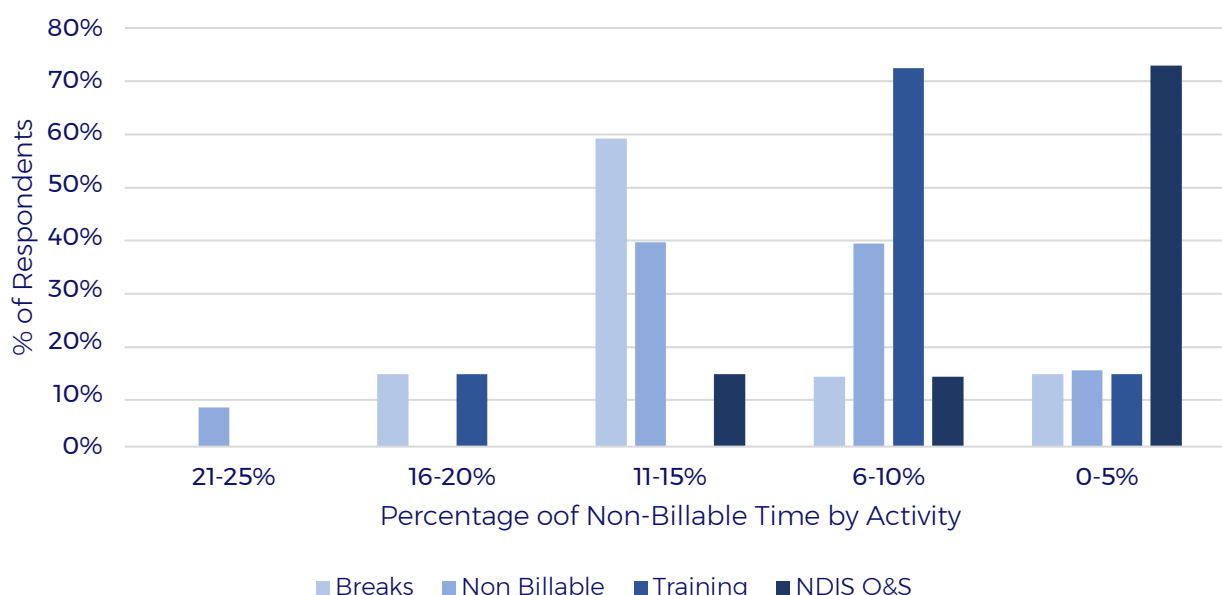
Level 3 Support Coordinators spend between 70% and 75% of available time undertaking billable work according to over 50% of the survey's respondents.

Graph 9. Percentage of Billable Time for Level 2 Support Coordinators – All Respondents



Level 3 Support Coordinators spend between 6% and 15% on breaks and non-billable activities whilst training accounted for between 6% and 10% whilst NDIS Quality and Safeguards Commission took another 0% to 5% of a Level 3 Support Coordinators time.

Graph 10. Percentage of Non-Billable Time for Level 3 Support Coordinators – All Respondents



4.2.9. STAFF RETENTION AND TURNOVER

Support Coordination is an intensive support which is profound for the workers who engage daily with participants that require complex support needs and/or experience moments of crisis.

Support Coordinators routinely find themselves going the extra mile for the participant they support and frequently coming up against resistance and systemic barriers.

Add this to the consistent underfunding of this support and we end up with a workforce that experiences significant burn out. Some Support Coordinators struggle to stay in the expansive, optimistic and collaborative mindset required for best practice support.

As such it is not uncommon for Support Coordination workers to change organisations or seek further career opportunities outside of the sector.

Whilst the sector continues to work extremely hard to support workers to manage and support both burn out and retention, there remains an ongoing cost to ensure workforce capacity which must be factored into the pricing for this support.

Table 50. Staff Turnover – Support Coordinators – All Respondents

Measure	% of Staff Turnover	% Shift in the past 18 months
Average	17%	▼ 2%
Median	11%	▼ 2%

Table 51. Cost of Staff Turnover (Replacement Cost) – Support Coordinators – All Respondents

Measure	Cost of Staff Turnover (Replacement Cost \$)
Average	\$4,696
Median	\$4,642



4.3. THE SUPPORT COORDINATION COST MODELS

The below models use the NDIA DSW Cost Model as a template using data specific to the delivery of Support Coordination support line items. The model is a general representation of the varied Support Coordination market with assumptions and settings aiming to provide benchmark levels to determine a transparent price.

Not all Support Coordination providers will meet each benchmark setting, some will be above and some below, however, in general terms, DIA believe that the Cost Model is an accurate representation of the required price to deliver Support Coordination under the NDIS in a sustainable fashion.

The Cost Model builds from a base pay rate adding incremental hourly costs that are incurred in the delivery of Support Coordination. Each level of Support Coordination available in the NDIS (Level's 1, 2 and 3) has an individualised Cost Model that incorporates elements relevant to that specific level of Support Coordination.

4.3.1. LEVEL 1: SUPPORT CONNECTION COST MODEL

Using the results from the DIA 2021-22 Annual Price Review – Pricing and Cost Model Survey, the May 2021 NDIA Financial Benchmarking Survey and ongoing Intermediary sector engagement, DIA has derived a Cost Model for the delivery of *Level 1: Support Connection* within the NDIS.

4.3.1.1. BASE PAY - LEVEL 1: SUPPORT CONNECTION

The Support Coordination sector is overwhelmingly dominated by employees employed under the SCHADS Award.

From the data collected, the most representative base pay band was '\$35 to \$39' with 88% of respondents.

These results, and an alignment with the NDIA DSW Cost Model, result in the SCHADS Level 3.2 pay point which is currently (November 2021) set at \$33.48 being the per hour base pay rate for the Level 1

Base Rate

Award SCHADS 3.2

Hourly Rate \$33.48

4.3.1.2. LEAVE ENTITLEMENTS - LEVEL 1: SUPPORT CONNECTION

The Cost Model assumes that each Level 1: Support Connection workers are entitled to:

- 20 days of annual leave;
- 10 days of personal leave; and
- 10 days of Public Holidays (as per the NDIA DSW Cost model rationale).

These leave entitlements and subsequent costs are accrued by the employer for each hour the employee works. The Cost Model accounts for this by adding these entitlements to the base level of pay received by the worker. The Cost Model also assumes the SCHADS weekly hours worked (38) and the number of days worked being 220.

The Cost Model does not include a shift loading as the typical working hours of Level 1 Support Coordinator are business hours between Monday and Friday.

Leave		
Cumulative cost per hour before leave (base rate)	\$33.48	
Annual Leave Hours	152	
Per cent of leave taken	100%	
Cost per worked hour per worked hour	\$3.04	
Personal Leave Hours	76	
Per cent of leave taken	100%	
Cost per worked hour per worked hour	\$1.52	
Public Holidays	76	
Per cent of leave taken	100%	
Cost per worked hour per worked hour	\$1.52	
Cumulative Cost		
Cumulative cost per hour after leave costs		\$39.57
Increase from base rate		15%

4.3.1.3. EMPLOYEE ON-COSTS - LEVEL 1: SUPPORT CONNECTION

It was found that well over a half of respondents pay allowances with vehicle (\$1,289) and miscellaneous (\$300) representing the cost to employers.

Workers Compensation premiums were found to be 2% of wages and salaries of Support Coordinators. Superannuation is added at the statutory minimum.

On Costs

Cumulative cost per hour before on costs	\$39.57
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Superannuation

Superannuation Rate	10%
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Superannuation Cost per worked hour	\$3.96
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Workers Compensation

Premium Rate	2%
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Premium Cost per worked hour	\$0.79
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Allowances

Allowance Rate	\$1589.00
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Allowance Cost per worked hour	\$0.95
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Cumulative Cost

Cumulative cost per hour after On Costs	\$45.27
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Increase from base rate	26%
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4.3.1.4. SUPERVISION - LEVEL 1: SUPPORT CONNECTION

Support Coordinators require supervision, training and guidance from more senior and skilled workers which the Cost Model recognises and incorporates.

The sector indicated, via the DIA survey, that Supervisors of Level 1: Support Connection workers are paid within a band that translates to the Level 4.1 SCHADS pay point.

The Cost Model assumes that a Supervisor will oversee fifteen (15) Level 1: Support Connection, which aligns with the NDIA DSW Cost Model.

The Cost Model assumes that Supervisors accrue Leave and On Costs on the same basis as Level 1: Support Connection workers.

Supervision			
Cumulative cost per hour before Supervision	\$45.27		
<u>Supervision</u>			
Level (SCHADS Equiv.)	4.1		
Base Pay	\$37.54		
Leave Costs	\$6.83		
On Costs	\$6.09		
<u>Span of Control</u>		Cumulative Cost	
Span of Control	15	Cumulative cost per hour after Supervision costs	\$48.63
Cost of Supervision per worked hour	\$3.36	Increase from base rate	31%

4.3.1.5. UTILISATION - LEVEL 1: SUPPORT CONNECTION

In addition to mandated breaks afforded under the SCHADS Award, workers undertaking Support Coordination require training and will also, in their normal course of employment, spend time on general activities that are not within the scope of the funded NDIA support.

The Cost Model recognises this, and aligning with the NDIA DSW Cost Model, has set an assumption that a Level 1 Support Coordinator would spend 89% of their time delivering a NDIA funded support.

The remaining time is spent on breaks, in training or other general activities. Utilisation for Levels 2 and 3 are lower than Level 1 reflecting the more complicated nature of the support provided and more closely aligns with the survey results.

Utilisation	
Cumulative cost per hour before Utilisation	\$48.63
<u>Utilisation</u>	
Breaks	4%
Training, Professional Development & Case Consult	4%
Other	3%
Utilisation Total	89%
Cost of Utilisation per worked hour	\$5.35

Cumulative Cost	
Cumulative cost per hour after Utilisation costs	\$53.98
Increase from base rate	38%

4.3.1.6. OVERHEADS - LEVEL 1: SUPPORT CONNECTION

The Cost Model assumes that corporate overheads are equal to 20% of direct costs (those costs as set out above).

Overheads			
Cumulative cost per hour before Overheads	\$53.98		
<u>Overheads</u>			
<i>Rent</i>	5%		
<i>Information Tech.</i>	5%		
<i>Audit and Compliance</i>	3%		
<i>Marketing</i>	3%		
<i>Fleet</i>	3%		
<i>Other</i>	1%		
Overheads Total	20%		
Cost of Overheads per worked hour	\$10.80		
		Cumulative Cost	
		Cumulative cost per hour after Overheads	\$64.77
		Increase from base rate	48%

Marketing / Google Ads

In previous NDIA Annual Price Reviews (see 2019) there was commentary by the NDIA around the cost and fees being paid by Support Coordinators to advertise their business on platforms such as Google Ads.

An analysis of Google Ad 'Keywords' has shown that 'NDIS Support Coordination' is an actively searched term and online marketing is an important element for attracting participants to a provider. Advertisers pay via a 'Cost per Click' (CPC) methodology with a higher CPC representing a higher conversion rate from a click to a sale of the good on offer, in this instance the provision of Support Coordination supports.

DIA's analysis shows that the keyword search 'NDIS Support Coordination' has a CPC of \$5.25. Using applicable conversion rates for each support, 10% for Support Coordination (based on research via Google Ad Analytics and the underlying nature of the purchasing decision being made) the cost of obtaining a participant for Support Coordination is approximately 2% of the yearly revenue of a Level 2 participant with 24 hours in their plan.

The Overhead assumption in this Cost Models has incorporated such costs.

4.3.1.7. STAFF RETENTION AND TURNOVER - LEVEL 1: SUPPORT CONNECTION

The respondents to the Support Coordination survey indicated that staff turnover is more focused on Levels 2 and 3 while overall staff retention initiatives are adding costs to providing Support Coordination supports. At Level 1, Employee Assistance Programs are widespread and typically cost \$500 per employee per annum.

Retention & Turnover

Cumulative cost per hour before on costs	\$64.77
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Retention

Retention Programs Including EAP, per annum per employee	\$500.00
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Flexible conditions including workload adjustments.	Nil
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Retention Cost per worked hour	\$0.30
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Turnover

Turnover/Replacement cost per annum	Nil
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Turnover Cost per worked hour	\$0.95
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Cumulative Cost

Cumulative cost per hour after Retention and Turnover	\$65.07
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4.3.1.8. MARGIN - LEVEL 1: SUPPORT CONNECTION

A 5% margin has been assumed to reflect the requirement for organisations to be sustainable and to facilitate investment and innovation in providing quality Level 1: Support Connection to NDIS participants.

Margin

Cumulative cost per hour before Margin \$65.07

Margin

Margin as a share of other costs 5%

Cost of Margin per worked hour \$3.25

Cumulative Cost

Cumulative cost per hour after Margin \$68.33



4.3.2. LEVEL 2: COORDINATION OF SUPPORTS COST MODEL

Using the results from the DIA 2021-22 Annual Price Review – Pricing and Cost Model Survey, the May 2021 NDIA Financial Benchmarking Survey and ongoing Intermediary sector engagement, DIA has derived a Cost Model for the delivery of *Level 2: Coordination of Supports* within the NDIS.

4.3.2.1. BASE PAY - LEVEL 2: COORDINATION OF SUPPORTS

The Support Coordination sector is overwhelmingly dominated by employees employed under the SCHADS Award.

From the data collected the most representative base pay band was \$40 to \$44 with 65% of respondents. This results in the SCHADS Level 4.4 pay point which is currently (November 2021) set at \$40.39 being the per hour base pay rate for the Level 2 Support Coordinator Cost Model.

Base Rate

Award SCHADS 4.4

Hourly Rate \$40.39

4.3.2.2. LEAVE ENTITLEMENTS - LEVEL 2: COORDINATION OF SUPPORTS

The Cost Model assumes that each Level 2: Coordination of Supports is entitled to:

- 20 days of annual leave;
- 10 days of personal leave; and
- 10 days of Public Holidays (as per the NDIA DSW Cost model rationale).

These leave entitlements and subsequent costs are accrued by the employer for each hour the employee works. The Cost Model accounts for this by adding these entitlements to the base level of pay received by the worker. The Cost Model also assumes the SCHADS weekly hours worked (38) and the number of days worked being 220.

Leave		
Cumulative cost per hour before leave (base rate)	\$40.39	
Annual Leave Hours	152	
Per cent of leave taken	100%	
Cost per worked hour	\$3.67	
Personal Leave Hours	76	
Per cent of leave taken	100%	
Cost per worked hour	\$1.84	
Public Holidays	76	
Per cent of leave taken	100%	
Cost per worked hour	\$1.84	
Cumulative Cost		
Cumulative cost per hour after leave costs		\$47.73
Increase from base rate		15%

4.3.2.3. EMPLOYEE ON-COSTS - LEVEL 2: COORDINATION OF SUPPORTS

It was found that well over a half of respondents pay allowances with vehicle (\$1,289) and miscellaneous (\$300) representing the cost to employers.

Workers Compensation premiums were found to be 2% of wages and salaries of Support Coordinators. Superannuation is added at the statutory minimum.

On Costs

Cumulative cost per hour before on costs	\$47.73
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Superannuation

Superannuation Rate	10%
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Superannuation Cost per worked hour	\$4.77
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Workers Compensation

Premium Rate	2%
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Premium Cost per worked hour	\$0.95
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Allowances

Allowance Rate	\$1589.00
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Allowance Cost per worked hour	\$0.95
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Cumulative Cost

Cumulative cost per hour after On Costs	\$54.41
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Increase from base rate	26%
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4.3.2.4. SUPERVISION - LEVEL 2: COORDINATION OF SUPPORTS

Support Coordinators require supervision, training and guidance from more senior and skilled workers which the Cost Model recognises and incorporates.

The sector indicated, via the DIA survey, that Supervisors of Level 2: Coordination of Supports workers are paid within a band that translates to the Level 7.3 SCHADS pay point.

The 'span of control' for Level 2: Coordination of Supports workers is set at a ratio of one Supervisor overseeing five and half (5.5) FTE Level 2: Coordination of Supports workers.

This assumption is lower than Level 1 but higher than Level 3 Support Coordination Cost Models. The Cost Model assumes that Supervisors accrue Leave and On Costs on the same basis as Level 2 Support Coordinator.

Supervision			
Cumulative cost per hour before Supervision	\$54.41		
<u>Supervision</u>			
Level (SCHADS Equiv.)	7.3		
Base Pay	\$54.86		
Leave Costs	\$9.61		
On Costs	\$8.27		
<u>Span of Control</u>		Cumulative Cost	
Span of Control	5.5	Cumulative cost per hour after Supervision costs	\$67.27
Cost of Supervision per worked hour	\$12.86	Increase from base rate	40%

4.3.2.5. UTILISATION - LEVEL 2: COORDINATION OF SUPPORTS

In addition to mandated breaks afforded under the SCHADS Award, workers undertaking Support Coordination require training and will also, in their normal course of employment, spend time on general activities that are not within the scope of the funded NDIA support.

The Cost Model recognises this and has set an assumption that a Level 2: Coordination of Supports workers would spend 75% of their time delivering a NDIA funded support.

The survey results showed that 80% of respondents indicated a Level 2: Coordination of Supports spending between 70% and 85% undertaking billable work.

The remaining time is spent on breaks, in training or other general activities including NDIS Quality and Safeguards Commission work. Utilisation for Level 2: Coordination of Supports workers is lower than Level 1 reflecting the more complicated nature of the support provided.

Utilisation			
Cumulative cost per hour before Utilisation	\$67.27		
<u>Utilisation</u>			
Breaks	6%		
Training, Professional Development & Case Consult	10%		
Other	9%		
Utilisation Total	75%		
Cost of Utilisation per worked hour		\$16.82	
Cumulative Cost			
Cumulative cost per hour after Utilisation costs		\$84.09	
Increase from base rate		52%	

4.3.2.6. OVERHEADS - LEVEL 2: COORDINATION OF SUPPORTS

The Cost Model assumes that corporate overheads are equal to 20% of direct costs (those costs as set out above).

Overheads			
Cumulative cost per hour before Overheads	\$84.09		
<u>Overheads</u>			
<i>Rent</i>	5%		
<i>Information Tech.</i>	5%		
<i>Audit and Compliance</i>	3%		
<i>Marketing</i>	3%		
<i>Fleet</i>	3%		
<i>Other</i>	1%		
Overheads Total	20%		
Cost of Overheads per worked hour	\$16.82		
		Cumulative Cost	
		Cumulative cost per hour after Overheads	\$100.91
		Increase from base rate	60%

Marketing / Google Ads

In previous NDIA Annual Price Reviews (see 2019) there was commentary by the NDIA around the cost and fees being paid by Support Coordinators to advertise their business on platforms such as Google Ads.

An analysis of Google Ad 'Keywords' has shown that 'NDIS Support Coordination' is an actively searched term and online marketing is an important element for attracting participants to a provider. Advertisers pay via a 'Cost per Click' (CPC) methodology with a higher CPC representing a higher conversion rate from a click to a sale of the good on offer, in this instance the provision of Support Coordination supports.

DIA's analysis shows that the keyword search 'NDIS Support Coordination' has a CPC of \$5.25. Using applicable conversion rates for each support, 10% for Support Coordination (based on research via Google Ad Analytics and the underlying nature of the purchasing decision being made) the cost of obtaining a participant for Support Coordination is approximately 2% of the yearly revenue of a Level 2 participant with 24 hours in their plan.

The Overhead assumption in this Cost Models has incorporated such costs.

4.3.2.7. STAFF RETENTION AND TURNOVER - LEVEL 2: COORDINATION OF SUPPORTS

The respondents to the Support Coordination survey indicated that staff turnover for Levels 2 and 3 and overall staff retention were adding costs to providing Support Coordination supports.

At Level 2, Employee Assistance Programs are widespread costing \$500 per employee per annum.

Flexible work arrangements and workload adjustments equate to a further reduction in billable time equivalent to approximately one week per year per Level 2 Support Coordinator.

The survey found that the Median cost for the replacement of Support Coordinators was \$4,692 per annum.

Retention & Turnover

Cumulative cost per hour before on costs	\$100.91
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Retention

Retention Programs Including EAP, per annum per employee	\$500.00
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Flexible conditions including workload adjustments.	\$1,500.00
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Retention Cost per worked hour	\$1.20
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Turnover

Turnover/Replacement cost per annum	\$4,500
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Turnover Cost per worked hour	\$2.69
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Cumulative Cost

Cumulative cost per hour after Retention and Turnover	\$104.80
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4.3.2.8. MARGIN - LEVEL 2: COORDINATION OF SUPPORTS

A 5% margin has been assumed to reflect the requirement for organisations to be sustainable and to facilitate investment and innovation in providing quality Level 2: Coordination of Supports to NDIS participants.

Margin

Cumulative cost per hour before Margin \$104.80

Margin

Margin as a share of other costs 5%

Cost of Margin per worked hour \$5.25

Cumulative Cost

Cumulative cost per hour after Margin \$110.04



4.3.3. LEVEL 3: SPECIALIST SUPPORT COORDINATION COST MODEL

Using the results from the DIA 2021-22 Annual Price Review – Pricing and Cost Model Survey, the May 2021 NDIA Financial Benchmarking Survey and ongoing Intermediary sector engagement, DIA has derived a Cost Model for the delivery of *Level 3: Specialist Coordination* within the NDIS.

4.3.3.1. BASE PAY - LEVEL 3: SPECIALIST SUPPORT COORDINATION

From the data collected, and from desktop research undertaken, the most representative base pay band for Level 3: Specialist Coordination is between \$65 to \$74 with 93% of respondents falling within this range.

The Cost Model is set at the lower bound of this range (\$65.00) for a Level 3: Specialist Coordination.

Base Rate	
Award	SCHADS Above 8.3
Hourly Rate	\$65.00

4.3.3.2. LEAVE ENTITLEMENTS - LEVEL 3: SPECIALIST SUPPORT COORDINATION

The Cost Model assumes that each Level 3: Specialist Coordination worker is entitled to:

- 20 days of annual leave;
- 10 days of personal leave; and
- 10 days of Public Holidays (as per the NDIA DSW Cost model rationale).

These leave entitlements and subsequent costs are accrued by the employer for each hour the employee works. The Cost Model accounts for this by adding these entitlements to the base level of pay received by the worker.

The Cost Model also assumes the SCHADS weekly hours worked (38) and the number of days worked being 220.

Leave		
Cumulative cost per hour before leave (base rate)	\$65.00	
Annual Leave Hours	152	
Per cent of leave taken	100%	
Cost per worked hour per worked hour	\$5.91	
Personal Leave Hours	76	
Per cent of leave taken	100%	
Cost per worked hour per worked hour	\$2.95	
Public Holidays	76	
Per cent of leave taken	100%	
Cost per worked hour per worked hour	\$2.95	
Cumulative Cost		
Cumulative cost per hour after leave costs		\$76.82
Increase from base rate		15%

4.3.3.3. EMPLOYEE ON-COSTS - LEVEL 3: SPECIALIST SUPPORT COORDINATION

It was found that well over a half of respondents pay allowances with vehicle (\$1,289) and miscellaneous (\$300) representing the cost to employers.

Workers Compensation premiums were found to be 2% of wages and salaries of Support Coordinators. Superannuation is added at the statutory minimum.

On Costs

Cumulative cost per hour before on costs	\$76.82
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Superannuation

Superannuation Rate	10%
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Superannuation Cost per worked hour	\$7.68
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Workers Compensation

Premium Rate	2%
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Premium Cost per worked hour	\$1.54
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Allowances

Allowance Rate	\$1589.00
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Allowance Cost per worked hour	\$0.95
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Cumulative Cost

Cumulative cost per hour after On Costs	\$86.99
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Increase from base rate	25%
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4.3.3.4. SUPERVISION - LEVEL 3: SPECIALIST SUPPORT COORDINATION

Support Coordinators require supervision, training and guidance from more senior and skilled workers which the Cost Model recognises and incorporates.

The sector indicated, via the DIA survey, that Supervisors of Level 3: Specialist Coordination workers are typically professionally qualified with extensive experience (often clinical backgrounds).

The 'span of control' for Level 3: Specialist Coordination workers is set at a ratio of one Supervisor overseeing three FTE Level 3: Specialist Coordination workers.

This assumption is lower than Level 2 reflecting the more complex nature of the support being provided.

The Cost Model assumes that Supervisors accrue Leave and On Costs on the same basis as Level 3: Specialist Coordination workers.

Supervision	
Cumulative cost per hour before Supervision	\$86.99
<u>Supervision</u>	
Level (SCHADS Equiv.)	Above 8.3
Base Pay	\$75.00
Leave Costs	\$13.64
On Costs	\$11.41
<u>Span of Control</u>	
Span of Control	3
<u>Cost of Supervision per worked hour</u>	
	\$33.35
Cumulative Cost	
Cumulative cost per hour after Supervision costs	\$120.33
Increase from base rate	46%

4.3.3.5. UTILISATION - LEVEL 3: SPECIALIST SUPPORT COORDINATION

In addition to mandated breaks, workers undertaking Support Coordination require training and will also, in their normal course of employment, spend time on general activities that are not within the scope of the funded NDIA support.

The Cost Model recognises this and has set an assumption that a Level 3: Specialist Coordination worker would spend 71% of their time delivering a NDIA funded support.

The survey results showed that 50% of respondents indicated that Level 3: Specialist Coordination workers spend between 70% and 75% undertaking billable work.

The remaining time is spent on breaks, in training or other general activities including NDIS Quality and Safeguards Commission work. Utilisation for Level 3: Specialist Coordination is lower than Level 1 and Level 2 reflecting the more complicated nature of the support provided and the required non-billable activities at this level.

Utilisation			
Cumulative cost per hour before Utilisation	\$120.33		
<u>Utilisation</u>			
Breaks	7%		
Training, Professional Development & Case Consult	12%		
Other	10%		
Utilisation Total	71%		
		Cumulative Cost	
Cost of Utilisation per worked hour		Cumulative cost per hour after Utilisation costs	\$155.23
		Increase from base rate	58%

4.3.3.6. OVERHEADS - LEVEL 3: SPECIALIST SUPPORT COORDINATION

The Cost Model assumes that corporate overheads are equal to 20% of direct costs (those costs as set out above).

Overheads			
Cumulative cost per hour before Overheads	\$155.23		
<u>Overheads</u>			
<i>Rent</i>	5%		
<i>Information Tech.</i>	5%		
<i>Audit and Compliance</i>	3%		
<i>Marketing</i>	3%		
<i>Fleet</i>	3%		
<i>Other</i>	1%		
Overheads Total	20%		
Cost of Overheads per worked hour	\$31.05		
		Cumulative Cost	
		Cumulative cost per hour after Overheads	\$186.28
		Increase from base rate	65%

Marketing / Google Ads

In previous NDIA Annual Price Reviews (see 2019) there was commentary by the NDIA around the cost and fees being paid by Support Coordinators to advertise their business on platforms such as Google Ads.

An analysis of Google Ad 'Keywords' has shown that 'NDIS Support Coordination' is an actively searched term and online marketing is an important element for attracting participants to a provider. Advertisers pay via a 'Cost per Click' (CPC) methodology with a higher CPC representing a higher conversion rate from a click to a sale of the good on offer, in this instance the provision of Support Coordination supports.

DIA's analysis shows that the keyword search 'NDIS Support Coordination' has a CPC of \$5.25. Using applicable conversion rates for each support, 10% for Support Coordination (based on research via Google Ad Analytics and the underlying nature of the purchasing decision being made) the cost of obtaining a participant for Support Coordination is approximately 2% of the yearly revenue of a Level 2 participant with 24 hours in their plan.

The Overhead assumption in this Cost Models has incorporated such costs.

4.3.3.7. STAFF RETENTION AND TURNOVER - LEVEL 3: SPECIALIST SUPPORT COORDINATION

The respondents to the Support Coordination survey indicated that staff turnover for Levels 2 and 3 and overall staff retention were adding costs to providing Support Coordination supports.

At Level 3: Specialist Coordination, Employee Assistance Programs are widespread costing \$500 per employee per annum.

Flexible work arrangements and workload adjustments equate to a further reduction in billable time equivalent to approximately one week per year per Level 3: Specialist Coordination workers.

The survey found that the Median cost for the replacement of Support Coordinators was \$4,692 per annum.

Retention & Turnover

Cumulative cost per hour before on costs	\$186.28
--	----------

Retention

Retention Programs Including EAP, per annum per employee	\$500.00
--	----------

Flexible conditions including workload adjustments.	\$1,500.00
---	------------

Retention Cost per worked hour	\$1.20
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Turnover

Turnover/Replacement cost per annum	\$4,500
-------------------------------------	---------

Turnover Cost per worked hour	\$2.69
-------------------------------	--------

Cumulative Cost

Cumulative cost per hour after Retention and Turnover	\$190.17
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4.3.3.8. MARGIN - LEVEL 3: SPECIALIST SUPPORT COORDINATION

A 5% margin has been assumed to reflect the requirement for organisations to be sustainable and to facilitate investment and innovation in providing quality Level 3: Specialist Support Coordination to NDIS participants.

Margin

Cumulative cost per hour before Margin \$190.17

Margin

Margin as a share of other costs 5%

Cost of Margin per worked hour \$9.51

Cumulative Cost

Cumulative cost per hour after Margin \$199.67

4.4. SUPPORT COORDINATION – PRICES

The Cost Models bring together the cost of the delivery of an hour of Support Coordination for each of Level 1, Level 2 and Level 3 to form transparent prices for the delivery of Support Coordination in the NDIS.

Support Coordination

Item Number		National	Remote	Very Remote
07_001_0106_8_3	Support Coordination Level 1: Support Connection	\$68.33	\$95.66	\$102.49
07_002_0106_8_3	Support Coordination Level 2: Coordination of Supports	\$110.04	\$154.02	\$165.06
07_004_0132_8_3	Support Coordination Level: Specialist Support Coordination	\$199.67	\$279.54	\$299.51

4.5. VALUE FOR MONEY – SUPPORT COORDINATION

Support Coordination is a capacity building support and wherever possible, Support Coordinators build and maintain people's skills to understand and implement their plans.

The intensity of services being delivered increases from Level 1 to Level 3. As such the higher the level of service the greater skills and experience a practitioner delivering Support Coordination will require to meet the participant support needs.

Support Coordination is described as assistance to strengthen participant's ability to connect with informal, mainstream and funded supports. Support Coordination providers look at how their practice is geared towards reducing people's reliance on paid supports and exploring ways of making progress towards goals that may not involve paid support.



5. CAPACITY BUILDING AND TRAINING IN PLAN AND FINANCIAL MANAGEMENT

Capacity Building and Training in Plan and Financial Management

This reasonable and necessary support, which focuses on strengthening the participant's ability to undertake tasks associated with the management of their supports. This support can be delivered by either a Support Coordinator or a Plan Manager based on the preference of the participant.

This includes:

- Building financial skills;
- Building organisational skills;
- Enhancing the participant's ability to direct their supports; and
- Developing Self-Management capabilities.
- Building financial skills;
- Building organisational skills;
- Enhancing the participant's ability to direct their supports; and
- Developing Self-Management capabilities.

Plan Managers and Support Coordinators delivering this support are expected to assist the participant to develop their financial and management to increase the participants ability to self-direct their supports, this may lead to self- management in future plans, where this is possible, but is not a requirement for access to this support.

Given this support is the same despite delivery by either a Support Coordinator or a Plan Manager the price for this support must continue to have parity and at the very least be linked to the price set for the minimum level of Support Coordination.

5.1. CAPACITY BUILDING AND TRAINING IN PLAN AND FINANCIAL MANAGEMENT- PRICES

The Cost Model for the delivery of an hour of Support Coordination Level 1 forms a transparent price which is to be used to set the prices for the Capacity Building supports in Plan and Financial Management.

Capacity Building and Training in Plan and Financial Management

Item Number		National	Remote	Very Remote
14_031_0127_8_3	Capacity Building and Training in Plan and Financial Management by a Plan Manager	\$68.33	\$95.66	\$102.49
07_003_0117_8_3	Capacity Building and Training in Plan and Financial Management by a Support Coordinator	\$68.33	\$95.66	\$102.49



6. OUT OF SCOPE

DIA has not included the following items into this submission and Cost Model.

6.1. DEBT LIABILITY AND RECOVERY ACTIVITIES – PLAN MANAGEMENT

DIA highlighted on Friday 11th. June, in a public article that the NDIA had been automatically raising and recovering debts from RPMPs.

DIA have been engaging heavily with the NDIA over the past months in order to achieve a satisfactory solution to this practice. DIA is pleased that following our strong advocacy the NDIA have paused and ceased the practice of automatic debt recovery. The NDIA are undertaking further discussions and review of its policy, practice and governance.

This matter and in turn the NDIA policy position behind it has yet to be finalised and as such has not been factored or included into the Plan Management Cost Model.

6.2. SUPPORT COORDINATION POLICY REVIEW

In September 2020, the NDIA released a Discussion Paper on Support Coordination, as at the time of this submission the NDIA has not released any information following this discussion paper.

More than a year on from its release, DIA understands that work within the NDIA in response to this discussion paper and underlying policy are continuing.

Given the duration since this consultation was undertaken and the development that has occurred within the market since, DIA remains unclear about the direction of this work.

Given the NDIA has not engaged further with the sector on this work any policy design being considered as a part of this work has not been factored or included into the Support Coordination Cost Model.

6.3. NDIS LEGISLATION CHANGES

DIA has reviewed the proposed changes to the NDIS Act and notes there are a number of changes that would have a significant impact on the NDIA's pricing arrangements.

For example, the Bill seeks to introduce a risk assessment for participants that request to engage an RPMP. This risk assessment is the exact same as the risk assessment undertaken for participants seeking to Self-Manage their plan. Should this legislation become law, DIA would advocate strongly that the same pricing arrangements and freedoms flow to participants Plan-Managing their funds given this equality in risk assessment.

However, with the proposed changes to the NDIS Act currently in front of the House of Representatives and Senate Committee it would be inappropriate to factor these into this submission and Cost Model.

DIA has committed to re-submitting this Cost Model and submission considering these changes should they become law.

6.4. PLANNING DECISIONS - SUPPORT COORDINATION

DIA notes the ongoing challenges experienced by many NDIS participants in securing enough funding for Support Coordination within their plan.

Whilst the NDIA have stated:

"On average, each eligible participant received 28.0 hours of support coordination in the nine months (annualised as 37.3 hours) at a cost of \$2,767 (annualised as \$3,690)."

Pg. 37 | PB Annual Pricing Review 2021-22 Consultation Paper 211014

DIA's own research and data indicates that the median number of funded hours is closer to 19.8 hours (\$1,959). This is, in DIA's view, far too few hours to undertake the support required by NDIS participants. The skewing of data, is in DIA's view, primarily caused by a smaller number of participants with very large Support Coordination budgets.

As decisions made in determining a participants plan funding are not the remit or entirely connected to NDIA's price control function, the volume of hours funded within a participant's plan have not been factored or included into the Support Coordination Cost Model.

DIA has instead focused on the Cost Model for a single hour of support for each of the three levels for Support Coordination.

6.5. COVID-19 PANDEMIC RESPONSE

Both Plan Management and Support Coordination providers have experienced significant increased costs associated with the COVID-19 Pandemic.

Unlike many other Disability Supports Plan Management and Support Coordination providers have not been eligible for support during the pandemic.

Despite this, DIA is of the view that with the vaccination rates increasing within the general Australian population such operating costs and impacts are at this stage reducing and as such have not been included in the Cost Models.

Should this change in the future the proposed models do not factor such increases in cost.



7. RECOMMENDATION

DIA recommends that the NDIA accept and implement the Cost Models contained within this submission and at a minimum set the below price limits:

Plan Management

Item Number		National	Remote	Very Remote
14_034_0127_8_3	Plan Management – Monthly Fee			
	A monthly fee for the ongoing delivery of financial management arrangements.	\$110.90	\$155.26	\$166.35
	<i>Set-Up Fee – amortised over 12 months</i>	<i>\$24.95</i>	<i>\$34.92</i>	<i>\$37.42</i>
	Total Monthly Plan Management Fee	\$135.70	\$189.98	\$203.55

The amortising of the ‘Set-Up Fee’, must not be viewed as mutually exclusive. In that if the NDIA seeks to not amortise the ‘Set-Up Fee’ then DIA would recommend all other elements of this cost model be accepted.

Support Coordination

Item Number		National	Remote	Very Remote
07_001_0106_8_3	Support Coordination Level 1: Support Connection	\$68.33	\$95.66	\$102.49
07_002_0106_8_3	Support Coordination Level 2: Coordination of Supports	\$110.04	\$154.02	\$165.06
07_004_0132_8_3	Support Coordination Level: Specialist Support Coordination	\$199.67	\$279.54	\$299.51

Capacity Building and Training in Plan and Financial Management

Item Number		National	Remote	Very Remote
14_031_0127_8_3	Capacity Building and Training in Plan and Financial Management by a Plan Manager	\$68.33	\$95.66	\$102.49
07_003_0117_8_3	Capacity Building and Training in Plan and Financial Management by a Support Coordinator	\$68.33	\$95.66	\$102.49

8. STATEMENTS OF SUPPORT

This submission has been reviewed and contributed to by the DIA membership and is made on behalf of providers who deliver Plan Management and Support Coordination services to 1 in 3 NDIS Participants (over 160,000 NDIS participants across Australia).

Further organisations have provided Statements of Support in support of this submission, these include:



26/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write on behalf of My Plan Manager.com.au Pty Ltd (4-3LLO_1790) in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to expect and deliver, high quality outcome-based supports in a sustainable NDIS.

Sincerely,



Jane Kittel
Chief Executive Officer
My Plan Manager

25 Franklin Street
Adelaide SA 5000

25/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write on behalf of Leisure Networks Association Inc (4050000092) in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,



Elizabeth Mears

CEO
Leisure Networks Association Inc
4 Verner St, South Geelong Vic 3220

27/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write on behalf of Plan Management Partners (NDIS Registration Number 4050002983) in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to expect and deliver high quality outcome-based supports in a sustainable NDIS.

Sincerely,



Sean Dempsey
CEO
Plan Partners
PO Box 131
Richmond, VIC 3121

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

26th November, 2021

Dear David,

I write on behalf of The Growing Space in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

The Growing Space is an independent Profit for Purpose company which employs only disabled people and family carers. We currently engage around 25 support coordinators, directly serving more than 400 participants across Australia, plus a reach of more than 100,000 participant and/or nominee stakeholders each month through our social media, training courses for Support Coordinators and Participants/Nominees and other avenues. Our Support Coordinators are effectively always at capacity, and we decline numerous participants on a daily basis. I am also a member of the NDIS Independent Advisory Council (and several reference groups) and myself and our company strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

I wish to further suggest that Support Coordination requires an implementation allowance/fee for every participant new to the scheme, or new to Support Coordination – the hours allocation frequently allotted does not consider the baseline onboarding costs of setting up and establishing a relationship with a participant, to the participant's detriment.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Kind regards,



Sam Paor
CEO, The Growing Space
sam@TheGrowingSpace.com.au
0410 513 013 (direct)



26/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write on behalf of Leap in! Australia (NDIS Quality & Safeguards Commission Registration 4-3LLM-2099) in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,



Andrew Kiel
Chief Executive Officer
Leap in! Australia

Leap in! Australia Ltd
ABN 92 622 499 898

Level 15
143 Turbot Street
Brisbane City QLD 4000

GPO Box 1744
Brisbane QLD 4001

Telephone **1300 05 78 78**



24/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write on behalf of Ablelink Pty Ltd (Registered Provider: 4050027522) in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,

Cameron Burns Director
Ablelink Pty Ltd
12/26 Victoria St
Fitzroy, VIC 3065

11/26/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write on behalf of Peak Plan Management in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,



Ross Rizzo
Director
Peak Plan Management
73 Victoria Street Ballarat



28/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write on behalf of Ethical Coordination of Supports #4050026933 in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,

Tanya Darwin

Tanya Darwin
Managing Director
Ethical Coordination of Supports
PO Box 115 Budgewoi NSW 2262

26/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write on behalf of MyIntegra (registered provider number 4050003624) in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,



Anna Lane

Interim Chief Executive Officer

myintegra

169 Broadway, Nedlands WA 6009

T 1800 696 347 | **M** 0408 364 290 | **W** myintegra.com.au

E anna.lane@myintegra.com.au

26/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write on behalf of Spyval Pty Ltd (4050068865) in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable, and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect high quality outcome-based supports in a sustainable NDIS.

Sincerely,

DocuSigned by:
Bronia Holyoak

B35C5AA1981549F...

Bronia Holyoak
Director
Spyval Pty Ltd
35 Waterperry Drive
Canningvale
6155
Western Australia

27 November 2021

Dr David Cullen
Chief Economist
National Disability Insurance Agency
GPO Box 700
CANBERRA ACT 2601

Via email: apr@ndis.gov.au

Dear Dr Cullen

Annual Price Review – Plan Management Services

I write in conjunction with the National Disability Insurance Agency's (NDIA) 2021-2022 NDIS Annual Price Review (APR).

Connect Plan Management Pty Ltd is a specialist, independent plan manager.

I have read Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review in respect of plan management and endorse its findings and conclusions.

The recommended monthly price for plan management calculated in DIA's submission of \$110.90 for the year commencing 1 July 2022 represents approximately two years' of inflation increase since the last price adjustment for plan management. In our submission, this calculation would be the fairest, minimum adjustment the NDIA should agree to.

In relation to the monthly price for plan management administration, we specifically wish to highlight the following matters:

1) Employment and wages outlook

There has been widespread commentary in the media regarding the difficulty employers generally, and specifically in certain sectors, have found and continue to find it difficult to attract and retain staff. This is confirmed anecdotally from our own experience and conversations with other NDIS providers.

In addition, the latest Australian Bureau of Statistics (ABS) shows quarterly private

sector wage growth of 1.0%.¹

We further note that inflationary pressures in the economy (such as housing, fuel, health) will likely add to these pressures.

We recommend the APR place appropriate focus on the outlook for employment and wages conditions rather than merely using historic data when forming conclusions about the appropriate inputs into plan management prices.

2) Payroll Tax

Payroll tax is not factored into DIA's calculations of employee on-costs or overheads. While payroll tax liabilities do not accrue for every plan management provider, they are relevant for almost all larger providers of plan management services. Payroll tax rates and thresholds vary in each Australian state; however on average payroll tax adds a further on-cost of around 4.85% for employers where payroll tax deductions are no longer available.

While we are not suggesting the rate calculated by DIA be increased further, we do recommend that the absence of payroll tax from those calculations be duly considered when testing assumptions and calculations.

3) Technology Costs

DIA correctly notes in its submission (p 19) that investments in technology have the potential to deliver operational efficiencies. As noted in the APR, the NDIA is pursuing a digital strategy including a participant mobile app and the recently released POS tender. This direction has the potential to substantially escalate technology costs for all plan managers beyond the allowance made by DIA in its allowance for technology overheads (refer p38 of the DIA submission). It is too early to tell the impact on the costs of delivering plan management services from these technology developments.

We further note that cost pressures in acquiring technology products and services have been well above overall inflation. This is in part due to disruptions to global supply chains, shortages of semiconductors and the absence of skilled worker immigration into Australia during the COVID-19 pandemic.

Conversion of plan management set-up fee into component of monthly admin fee

We strongly endorse DIA's submissions in this area. We note the disincentives created by having a substantial upfront fee and the limitations potentially placed on participants in switching plan managers during a plan. While Connect Plan Management accepts customers regardless of remaining plan management funding available in their plan, we have spoken to many customers and their providers and representatives that have indicated this in an issue.

¹ ABS Wage Price Index September 2021 - <https://www.abs.gov.au/statistics/economy/price-indexes-and-inflation/wage-price-index-australia/sep-2021>

Conclusion

We strongly support the DIA submission's focus on the development and implementation of transparent and representative cost model in setting the price levels for Plan Management in the NDIS.

We believe the delivery of high-quality plan management services adds to participant experience and satisfaction and enhances the overall sustainability of the NDIS.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'A. Oostenbroek', with a stylized, flowing script.

Anthony Oostenbroek
Managing Director

27/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write on behalf of The Trustee for TCP Trading Trust, trading as The Carers Place Pty Ltd, NDIS Registration Number 405 0028 343 in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,



Mrs Cassandra Day
Managing Director
The Carers Place Pty Ltd
2/118 Main South Road
Morphett Vale SA 5162

IDEAL

Plan Management

26/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

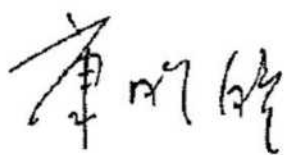
Dear Dr Cullen,

I write on behalf of IDEAL Plan Management (registered provider number: 4050 009 702) in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,



Billy Kang
Partner
IDEAL Plan Management
GPO Box 500 Canberra ACT 2601



23 November 2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

We write on behalf of Empowrd Pty Ltd in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,

Two handwritten signatures in black ink. The first signature is 'Trish Kelsh' and the second is 'Rebecca Kolpondonos'.

Trish Kelsh and Rebecca Kolpondonos
Directors
Empowrd
10B Washington Street
Port Lincoln SA 5606

25/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,



Claire Williams
Claire Coordination of Supports
990 Whitehorse Road
Box Hill VIC 3128

23 November 2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601

Email: apr@ndis.gov.au

Dear Dr Cullen,

I write on behalf of myCSN Disability Pty Ltd (a subsidiary of myCSN Network Pty Ltd) in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable, and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver and expect high quality outcome-based supports in a sustainable NDIS.

Sincerely,



Rob Evers
Managing Director
myCSN Disability Pty Ltd
Suite 8, 96 Manchester Road
Mooroolbark VIC 3138



23 November 2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601

apr@ndis.gov.au

Dear Dr Cullen,

I write on behalf of Your Plan Manager, Provider no: 4050 026 967 in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,

A handwritten signature in black ink, appearing to read "TW", is positioned above the printed name of the sender.

Tanya Walford
Director
Your Plan Manager
9B, 24-28 Corporation Circuit
TWEED HEADS SOUTH NSW 2486

NDIS Registered Provider
No: 4050 026 967
ABN: 68 603 270 613

Email plan@ypm.com.au
Phone 1800 YOUR PLAN / 1800 968 775
Web www.ypm.com.au

PMCSS

Specialist Support Coordination

223 Wyndham Street
Shepparton VIC 3630

26/11/2021

Dr. David Cullen
Chief Economist
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,



Lin Woods
Lead Practitioner



23/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write on behalf of All Disability Plan Management, 4050008632, in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,

Jo Hollis

Jo Hollis
CEO
All Disability Plan Management
5B, 116 Gordon St
Port Macquarie NSW 2444

AMELIA EDMONDS SUPPORT COORDINATION



24/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

I strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

I look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,

Amelia Edmonds
Sole Trader – Support Coordination
Goondiwindi QLD 4390

email: amelia.edmonds@icloud.com



26/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write on behalf of Canny Plan Management (4050073051) in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthea Taylor".

Anthea Taylor
Head of Plan Management
Canny Plan Management
East 3 Federal Mills Park
33 Mackey Street
NORTH GEELONG VIC 3215

ROY Co.

25/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,

Amie Roy
Roy Co.
990 Whitehorse Road
Box Hill VIC 3128



26/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write on behalf Balanced Account Bookkeeping 4050014912 in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.


Sincerely,

Tina McLaren

Tina McLaren

Managing Director
Balanced Account Bookkeeping

523 Caniaba Road
Caniaba NSW 2480



25/11/2021

Dr. David Cullen
Chief Economist
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

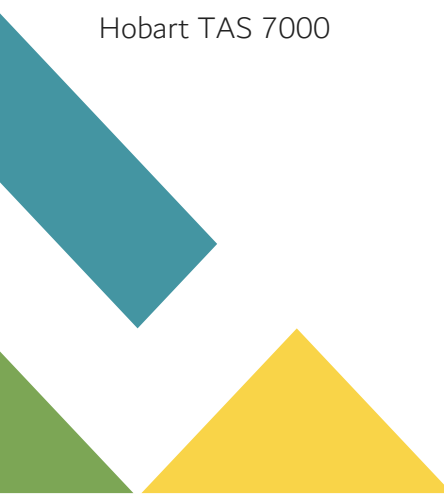
We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,

Anabia Knapp

Knapp Connections

134 Macquarie St
Hobart TAS 7000





23/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write on behalf of iAssist Plan Management (4050036229) in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,

A handwritten signature in black ink that reads "S Carmody". The signature is written in a cursive, flowing style.

Susan Carmody
Owner/Founder
iAssist Plan Management
32 Falcon Street, Narrogin WA 6312

AMELIA EDMONDS SUPPORT COORDINATION



24/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

I strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

I look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,

Amelia Edmonds
Sole Trader – Support Coordination
Goondiwindi QLD 4390

email: amelia.edmonds@icloud.com



27/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write on behalf of Jigsaw Plan Management Pty Ltd provider registration number 4050038108 in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,

A handwritten signature in black ink that reads "Kay Rudd".

Kaylene Rudd
Director
Jigsaw Plan Management Pty Ltd PO Box 545
Goulburn NSW 2580



26/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,

Jai Slater

Jai Slater
Slater Coordinator
Batemans Bay NSW 2536

jai.slater@icloud.com

28 November 2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
Email: apr@ndis.gov.au

Dear Dr Cullen,

I write on behalf of **JRA Plan Management [Registered #4050045439]** in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,

Samantha Moore

Samantha Moore
Director
JRA Plan Management
6 Wickerson Cres
Bli Bli, Qld 4560
Email: samantha@jrplanmanagement.com.au
Phone: 0418 478 446

25/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write on behalf of JD Coordination & Support Services, Provider Number 4050003661 in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,



Jody Hamilton
Manager
JD Coordination & Support Services
6 Cranwell Way, Wyndham Vale, Victoria 3024

26/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write on behalf of Pathways to Care Pty Ltd in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,

Roslyn J Winzar

Roslyn Winzar
Executive Director
Pathways to Care P/L
128 Mollison St
BENDIGO VIC 3550

e: ros@pathwaystocare.com.au
m: 0429 140650
www.pathwaystocare.com.au



27/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write on behalf of EMMJ disability services Pty Ltd t/a Rise and Shine Plan Management NDIS registration 4-FJ5LXGX in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,

Mellinda Shepherd

Mellinda Shepherd
Director, Plan Manager

Elizabeth Barboza

Elizabeth Barboza
Director, Plan Manager

EMMJ Disability Services TA Rise and Shine Plan Management
80 Mount Annan drive Mount Annan NSW 2560

28/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write on behalf of Shoalhaven Plan Management (4050070188) in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,

Karen Gifford

Karen Gifford
Director
Shoalhaven Plan Management
14 Frederick St, Vincentia NSW 2540

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

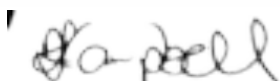
Dear Dr Cullen,

I write on behalf of C.J Campbell and D.L Campbell trading as Total Plan Management (NDIS Provider 4050009287) in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,



Diona Campbell
Partner
Total Plan Management

27/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write on behalf of in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,



Pauline Fernandez
Founder and Owner
P. Fernandez Support Coordination
Perth WA 6001

e.pauline.fernandez@gmail.com

Phone: 1800 63 63 77
Email: info@ndsp.com.au
www.ndsp.com.au

48, Greenhill Rd
Wayville, SA 5034

26 November 2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

We write on behalf of NDSP Plan Managers Pty Ltd (Provider Number 4050019899, NDIS Commission ID 4-3LLQ-974) in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review on the basis discussed below.

The leadership and effort shown by the DIA is appreciated in creating a significant and cohesive response from the Plan Management industry to the NDIA 2021/22 Annual Pricing Review. We believe the DIA have collected critical plan management industry data to validate their proposal and is a comprehensive piece of work on behalf of all Plan Managers.

We support the DIA's submission that increases the monthly fee by 5.8% due to cost increases incurred by Plan Managers over 2021/22 and 2022/23. Our belief is this does not fully cover the CPI and increased labour costs that have been or will be incurred by our business over that period (we believe it will be 6.6%), but we are willing to agree to the DIA's figure as part of its broader representation of the industry.

In principle, we support the concept of the annualisation of set up fees recommended by the DIA. Our analysis indicates that the multiplier being used by the DIA of 1.2 is actually less than we are experiencing with our large client base. Our figure is currently 1.4 and it has been rising over the last 12 months. We understand the NDIA's intentions to reduce this figure over time by extending plans to two to three years where possible. Our firm belief is this requires further detailed consultation for the NDIA due to participant and provider behaviour indicating the number of set up fees are increasing, not declining.

As one of the market leaders, we are keen to participate in the examination of the pricing arrangements for plan management to contribute to a fair and equitable strategy of reducing this multiplier, but currently cannot support the level that has been set by the DIA.

We are very pleased to have been invited to the working group to discuss these pricing models as part of a broader understanding of the evolving role of the Plan Manager and are happy to commit our actual figures to confidential discussions within this framework.



Phone: 1800 63 63 77
Email: info@ndsp.com.au
www.ndsp.com.au

48, Greenhill Rd
Wayville, SA 5034

The significant work undertaken by the DIA on our behalf and behalf of the industry is sincerely appreciated along with the opportunity to have further discussions around pricing and industry standards with the NDIA.

As a passionate organisation with a very client (NDIS participant) focussed approach to all these issues, we look forward to contributing to a sustainable and successful NDIS.

Yours sincerely,



Don Dickie
Managing Director



Graham Oades
Chief Executive Officer

NDSP Plan Managers
48 Greenhill Road
Wayville SA 5034



27/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write on behalf of in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,

Gregg Fitzgerald

Gregg Fitzgerald
Founder and Owner
Gregg Fitzgerald Support Coordination
Darwin NT 0800

1 Call Plan Management

26/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

Dear Dr Cullen,

I write on behalf of 1 Call Plan Management-Provider #4050055376 in support of Disability Intermediaries Australia's (DIA's) submission to the 2021-2022 NDIS Annual Price Review.

We strongly support this submission's focus on the development and implementation of transparent and representative Cost Models in setting the price levels for both Plan Management and Support Coordination supports delivered in the NDIS.

We look forward to providing ongoing, sustainable and high-quality Intermediary support services which can be achieved under the proposed Cost Models developed by DIA. Transparent and representative price settings will provide both participants and providers with the clarity required to deliver, and expect, high quality outcome-based supports in a sustainable NDIS.

Sincerely,

Sharon Kalos

Sharon Kalos
Sole Trader
1 Call Plan Management
23 Blackham Way
Balga 6061 WA



Registered NDIS Provider



24/11/2021

Dr. David Cullen
Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

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Sincerely,

Raj Howe

Raj Howe
Support Coordinator – Sole Trader
Walgett NSW 2832

raj.howe@gmail.com

#1 Answer Plan Management

26/11/2021

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Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
apr@ndis.gov.au

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Sincerely,

Leanne Brenton

Leanne Brenton
Director – Plan Manager
#1 Answer Plan Management
PO Box 1454
MIDLAND DC WA 6936

27/11/2021

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Chief Economist
Annual Price Review
National Disability Insurance Agency
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Canberra, ACT, 2601
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Sincerely,

Lori Crowther
Support Coordination
Surfers Paradise QLD 4217

lori_1986@gmail.com

27/11/2021

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Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
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Sincerely,

Effie Schroeder

Effie Schroeder
Support Coordinator
Wollongong NSW 2500

27/11/2021

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Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
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Sincerely,



Monica Mckee
Owner
Monica Mckee Support Coordination
Brisbane QLD 4000

monika.mckee@gmail.com

27/11/2021

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Chief Economist
Annual Price Review
National Disability Insurance Agency
GPO Box 700
Canberra, ACT, 2601
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Sincerely,

Amanda Burke
Burke Support Coordination
Albury NSW 2640

aburke_SC@hotmail.com



Disability
Intermediaries
Australia