Disability Intermediaries Australia

Annual Price Review 2024

Pricing Submission

Disability Intermediaries Australia Ltd.

March 2024 Submission

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 and the dignity of risk for all Australians with a disability.

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1. EXECUTIVE SUMMARY

Disability Intermediaries Australia Limited (DIA) presents this substantial 2024 annual price review submission with urgency.

The NDIA has not to date explained or made publicly available a pricing model or set of assumptions to support the current price limits and price arrangements for Support Coordination.

DIA's submissions over the past 4 years has included significant structured national data about the operational environment and cost model for Support Coordination.

DIA conducts Australia's largest disability bench-marking program which underpins and provides the evidence basis for this submission.

DIA has further refined our bench-marking program to provide even greater clarity and information on how the Support Coordination markets operate and their cost drivers.

DIA invited both its members as well as non-member Support Coordination providers to be involved in this year's benchmarking program.

This work continues to identify the underlying market conditions of Support Coordination.

Overall, the data collected confirmed:

i. Support Coordination Providers deliver extremely cost-effective services providing exceptional value for money to the NDIS Participants and the Scheme;

ii. Current pricing arrangements and limits are driving providers to cease service, de-register or focus on efficient service delivery at the expense of quality.

iii. Support Coordination Providers are experiencing substantial increases in workforce related costs with significant difficulties in attracting and retaining a workforce that is focused on delivering quality; 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 NDIA Price Settings are inadequate to meet the operating costs incurred by Support Coordination Providers.

DIA's benchmarking program spans both Support Coordination and Plan Management.

DIA has collected data at each service level / service offering with over **1386 individual responses** from active providers which included 865 Support Coordination Providers and 521 Plan Management 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 LGBTIQA+ etc).

2. SCOPE OF THIS SUBMISSION

This submission and the cost models have been built and underpinned by Regulations and Policy set by:

- The NDIS Act;
- The NDIS Quality and Safeguards Commission:
    - Code of Conduct
    - Practice Standards
- The NDIA:
    - Operational Guidelines
    - Improving Support Coordination for Participants Policy
    - Guide to Plan Management
    - Pricing Arrangements and Price Limits Documents
    - Website FAQ's and Content
- DIA developed Professional Standards of Practice.

Combined these sources clearly define the current role, scope and function of Support Coordination, with enough clarity to ensure effective price regulation.

3. ABOUT DISABILITY INTERMEDIARIES AUSTRALIA

DIA is Australia's peak body for 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 more than half of all NDIS Participants

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DIA members (providers and practitioners) deliver Support Coordination and Plan Management services more than half of all NDIS Participants, over 330,000 NDIS participants across Australia.

DIA members service more than 71 per cent of participants that engage a Support Coordination and/or a Plan Management provider.

4. INTERMEDIARIES

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

Intermediary organisations play a critical, and yet often underfunded role in supporting participants to establish and monitor support arrangement, providing information and ongoing support regarding the specific needs of participants as well as guiding NDIS participants through the complexity of the scheme.

In 2023/24 Quarter 2
(October to December 2023)

59% of Participants were funded with Support Coordination

72% of Participants chose to have their NDIS funds managed by a Plan Manager

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5. RECOMMENDATIONS

Over the past decade, the NDIA has significantly under invested in Levels 2 and 3 Support Coordination where 99%[1] of Support Coordination is funded.

Support Coordination Levels 2 and 3 has not received a change to its price limits for the past 4 years since 1 July 2020, whilst other NDIS support price limits have risen by over 20%.

The recommendations of the NDIS review will have future impacts on the Support Coordination sector and the NDIA must consider a pricing structure that takes current operations and future transformation into consideration to ensure a viable and quality market is maintained for Support Coordination as the outcomes of the NDIS Review are implemented over the next 5 years.

As such long tail efficiency pricing methodologies that the NDIA has been utilising are not appropriate for the coming period of change. DIA's recommendations balance the need for the urgent pricing increases required for the sector to remain viable whilst the NDIS Review is considered, co-designed and its outcomes implemented.

DIA makes the following recommendations which are supported in evidence and data in the following sections of this submission.

RECOMMENDATION ONE

Increase Support Coordination price limits.

	National	Remote	Very Remote
Support Coordination Level 1 Support Connection 07_001_0106_8_3	**$82.09**	*$116.01*	*$124.30*
Support Coordination Level 2 Coordination of Supports 07_002_0106_8_3	**$123.14**	*$174.45*	*$186.91*
Support Coordination Level 3 Specialist Support Coordination 07_004_0132_8_3	**$217.58**	*$306.03*	*$327.89*

[1] 2022-23 NDIS Annual Pricing Review Report - https://www.ndis.gov.au/media/6051/download?attachment

RECOMMENDATION TWO

Include Support Coordination in NDIS Bereavement Addendum

DIA calls on the NDIA to ensure Support Coordinators are able to claim up to 10 hours in the 30 days after a participant's death where they are required to undertake Coordination activities (e.g. Coordinating the ceasing of services with providers, ensuring providers promptly make claims for services delivered prior to the participants passing and providing a report(s) to the NDIA as requested etc.) in respect of a participant's death.

RECOMMENDATION THREE

Plan Management has not received a change to its price limits for the past 4 years since 1 July 2020, whilst other NDIS support price limits have risen by over 20%.

The recommendations of the NDIS review will have future impacts on the Plan Management sector and the NDIA must consider a pricing structure that takes current operations and future transformation into consideration to ensure a viable and quality market is maintained for Plan Management as the outcomes of the NDIS Review are implemented over the next 5 years.

DIA calls on the NDIA to increase the price limit for Plan Management. The NDIA needs to create a pricing model that will support quality service as the recommendations of the NDIS Review are implemented.

DIA is disappointed that the NDIA has elected not to include Plan Management in this year's annal price review. Plan Managers have been forced by the NDIA to absorb increase in wages, increases in business overheads, increases in NDIA administration inefficacies including the implementation of PACE.

DIA will make a separate evidence-based submission outside of the Annual Price Review process, however in the immediate term DIA calls on the NDIA to increase Plan Management Price Limits taking into consideration an increase including CPI 3%, Pricing Uplift and Quality Support 13%, NDIS Registration 2%.

Increase Plan Management price limits.

	National	Remote	Very Remote
Plan Management Set Up Fee 14_033_0127_8_3	**$274.17**	*$383.84*	*$411.26*
Plan Management Monthly Fee 14_034_0127_8_3	**$123.25**	*$172.55*	*$164.88*

6. INTRODUCTION

One of the founding principal objectives of the National Disability Insurance Scheme (NDIS) is for people with disability to self-direct and exercise choice and control over how, and with which providers, they spend their available NDIS budgets. The role of pricing in the NDIS is therefore highly important.

Prices limits impact the purchasing power of participants by setting artificial price hooks in the market. Over time DIA has seen the price limit become the price point. This is in the main due to a lack of significant investment in the strategic forward price setting plan to drive quality and innovation. The prices participants pay for supports affects the total costs of the NDIS and therefore its financial trajectory.

In the Support Coordination sector this tension between quality / innovation and total scheme costs, fall in favour of reducing scheme costs at the detriment of quality and innovation.

Designed to work as a 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.

To underpin the price controls of services, generally the NDIA employs a Cost Model which estimates the cost-of-service provision of NDIS services. However, this is not the case for Support Coordination.

The NDIA has not to date explained or made publicly available a pricing model or set of assumptions to support the price limits and price arrangements for Support Coordination, particularly levels 2 and 3.

DIA has proposed a cost model that considers multiple factors including wage awards, leave and non-billable time, supervision and operational overheads.

The output of this model is intended to be used to support the Annual Price Review.

7. DATA SOURCES AND COVERAGE

The development of the attached cost models involved the ongoing 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 this year's annual benchmarking program. The survey could be completed via an online survey platform, via return email or in 1 on 1 sessions with DIA.

DIA has made a number of improvements to our bench-marking program to ensure even greater accuracy and precision by our respondents. This has only been possible because of the trust built through our inaugural bench-marking program last year. DIA will continue to develop and improve our program each year to better inform the work that DIA does in supporting the market.

DIA collected data from 1386 unique respondents (865 Support Coordination Providers and 521 Plan Management Providers).

In addition, DIA has collected data from sources including FOI requests, Senate Estimates, Publicly Available Sources and Other Sources. The data collected and utilised to support this submission contains over 8 million individual data points.

8. SUPPORT COORDINATION BACKGROUND

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.

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.
Level 3 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.

8.1. SUPPORT COORDINATION PRICE LIMITS

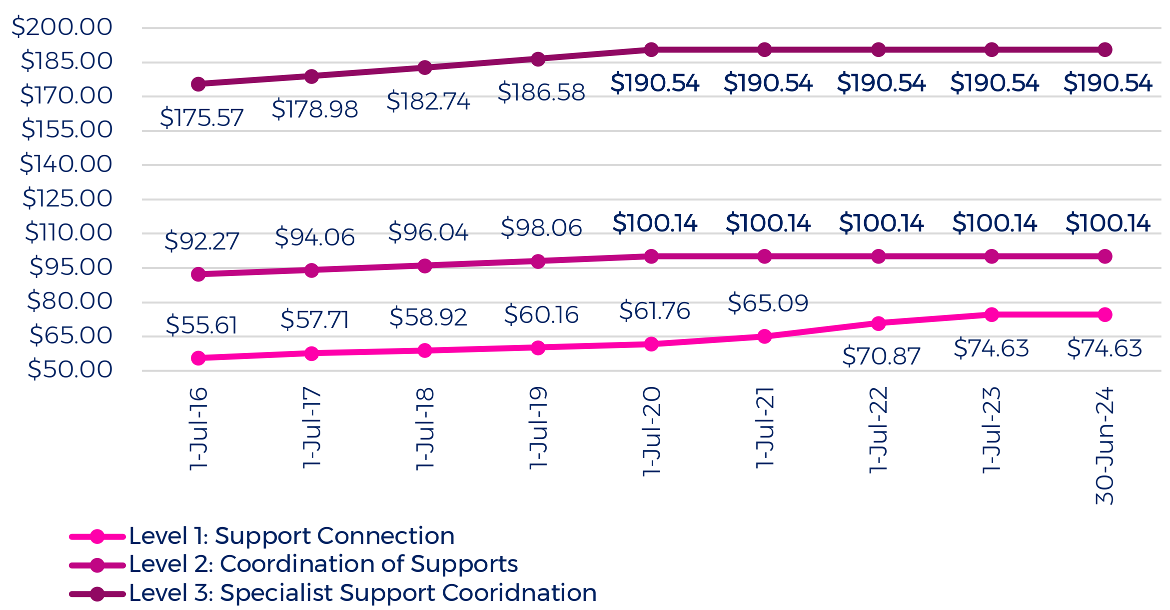
The current pricing model and arrangements for Support Coordination is based on the work undertaken by the NDIA which dates back to 2016.

Level 1: Support Coordination has since 2016 for the most part, noting some minor discrepancies in early years, been fixed to the NDIA Disability Support Worker Cost Model as such each year the price limit for this level of Support Coordination has increased every year taking into consideration CPI rates and Award Wage increases.

Level 2 - Coordination of Supports and Level 3 - Specialist Support Coordination are not included in the NDIA Disability Support Worker Cost Model as such the price limits for these levels of Support Coordination have not increased in line with CPI and/or Award Wage increases. This has meant that these levels have remained relatively flat for almost a decade.

Since 1 July 2020 the price limit for Support Coordination Level 2 and 3 have been frozen, where 99%[2] of Support Coordination is funded.

NDIS Support Coordination Price Limits Over Time



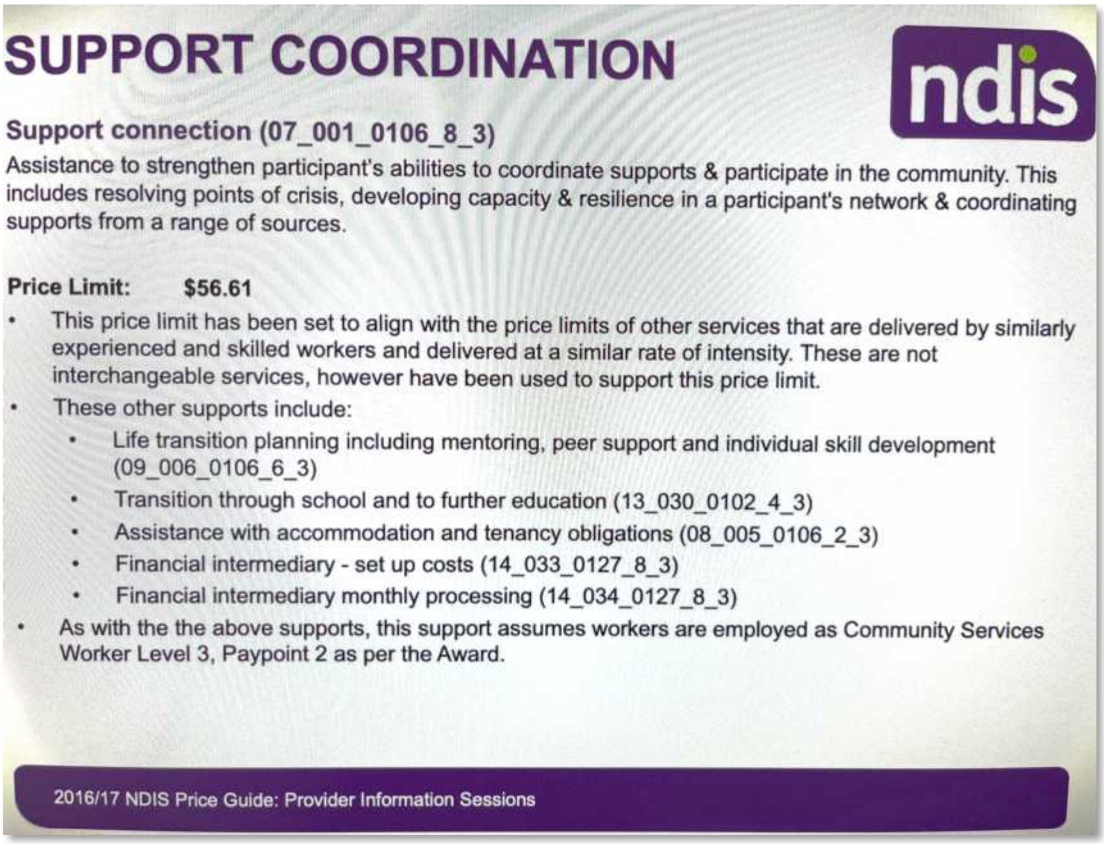
[2] 2022-23 NDIS Annual Pricing Review Report - https://www.ndis.gov.au/media/6051/download?attachment

In 2016 the NDIA set the foundational pricing structure for Support Coordination. Despite the NDIA stating that the price limits for Support Coordination Levels 2 and 3 *"were not set by reference to a specific cost model."* DIA understand that the NDIA has used some modelling or assumptions when establishing the Price Limits back in 2016.

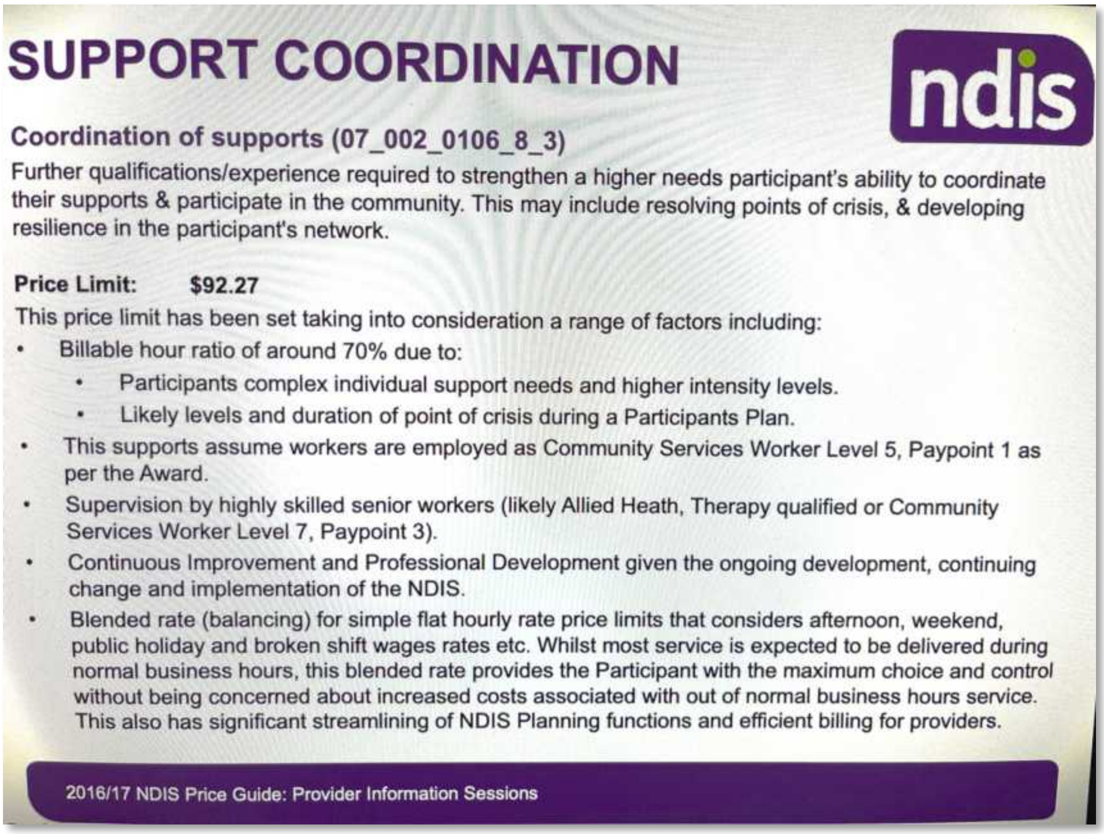
DIA has been able to locate photos of slides from presentations delivered by the NDIA to providers in Victorian ahead of the Price Guide release in July of 2016, which provide a reasonable assumption as to how the prices were established for each level of Support Coordination.

DIA notes that whilst the below does not confirm that a full cost model was established for Support Coordination, however it does clearly indicate the assumptions that underpin the current disability support worker cost model, with items like the level of listed Award for workers, Billable hour rate assumptions (utilisation) and balancing measures for flat hourly rate limits.

2016 Assumption for Support Coordination Level 1: Support Connection



2016 Assumption for Support Coordination Level 2: Coordination of Supports



2016 Assumption for Support Coordination Level 3: Specialist Support Coordination

8.2. AJCENT SECTOR COMPARISON

The NDIA has significantly under invested in Support Coordination over the past four years, particularly Levels 2 and 3 of Support Coordination, where 99% of Support Coordination is funded.

Support Coordination price limits and market price is significantly below other adjacent sectors both within and outside of the NDIS. Below we explore the adjacent sectors and their price limits and normal market rates.

Aged Care	**34.75% higher** than closest NDIS Support Coordination
TAC (VIC)	**10.55% higher** than closest NDIS Support Coordination
iCare (NSW)	**34.87% higher** than closest NDIS Support Coordination
NDIS LAC	**94.29% higher** than closest NDIS Support Coordination

8.2.1. AGED CARE

The closest Aged Care support to Support Coordination is Care Management within the Home Care Package space.

The Care Management Fee plays a crucial role in ensuring the seamless coordination and effective management of your care services. Starting from January 1, 2023, providers are limited to charging a maximum of 20% of the package level for care management.

Whilst it is recognised that the level and type of complexities and coordination differ between Home Care Packages (HCP) and Support Coordination (SC) there are some similarities. These including a four stepped structure based on the complexities, package and needs requirements of the person in the respective scheme.

NDIS Levels:	LAC	SC L1	SC L2	SC L3
HCP Levels:	HCP L1	HCP L2	HCP L3	HCP L4

There are some massive differences Care Management is limited to a maximum of 20% of the Home Care Package, however in contrast Support Coordination is funded via a Reasonable and Necessary decision and is not capped at the funded package level but is at the hourly claiming level. As at 31 December 2023 the percentage of a NDIS Participants Plan's Committed Funding allocated to Support Coordination was closer to 6%[3].

DIA acknowledges that the funding model is different across these two schemes and that the level of specialisation and costs do deviate most

[3] 2022-23 NDIS Annual Pricing Review Report - https://www.ndis.gov.au/media/6051/download?attachment

significantly at each end of the four support levels making it difficult to compare and contrast the end tiers.

However, the middle tiers are where the most similarities appear. On average NDIS Participants with funded Support Coordination are funded with around $5,200 per year in contrast HCP L3 is at $7,007 per year. DIA recognises that it is difficult to compare an average of a needs assessed support to that of a fixed price support however the difference is significant with HCP Care Management being 34.75% higher.

The average hourly wage rate for an HCP L3 Care Management worker is equal to SCHADS level 6.1 (around $52 per hour) vs that of a Level 2 Support Coordinator at 5.1 (around $47 per hour). This has seen a significant volume of NDIS Support Coordinators leave the sector to higher paying roles like those available in Aged Care.

8.2.2. TAC CASE MANAGEMENT

TAC can approve the provision of reasonable, strengths-based case management services for a client who has sustained injuries resulting from a transport accident and requires the specific expertise of a case manager. Billed using item number CAP180 (Face to Face), CAP180T (Tele-Practice) and CAP185 (Travel Rate) which are all the same rates.

The role of a TAC Case Manager[4] is slightly below than that of a Level 2 NDIS Support Coordinator with some functions being similar but for people with less complex support needs. In DIA's opinion TAC Case Management sits closer to Level 2 than Level 1 but is not a completely direct comparison. TAC Case Manager functions include:

- Finding sustainable accommodation.
- Supporting TAC client to make informed decisions and exercise choice and control in their lives – where necessary utilising a supported decision-making framework.
- Supporting TAC client to re-establish their role in the community, at home, in school, at work and in leisure activities. Closer to Level 1 Support Coordination
- Supporting TAC client in specific matters which require utilising and building self-advocacy skills.
- Linking the client in with mainstream services.
- Crisis management planning and development of self-managing skills and strategies.
- Progress Reporting.

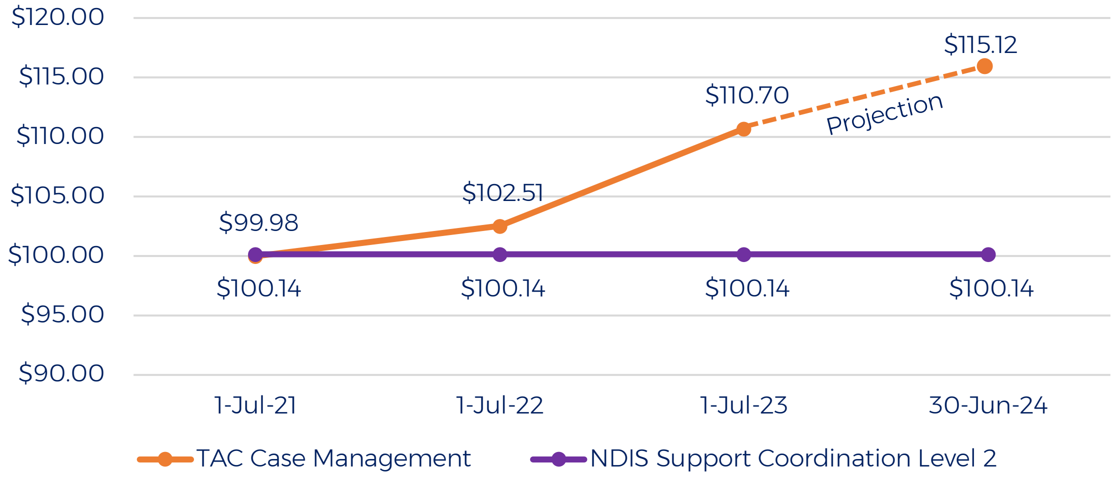
[4] TAC Case Management Guidelines https://www.tac.vic.gov.au/providers/type/case-management/delivering-services/case-management-guidelines

Based on the difference in function and complexity of support needs DIA believes that the **TAC Case Manager price should be between 6% and 7% lower than that of Level 2 Support Coordination**.

However, on 1 July 2023, TAC set the hourly fixed price for the **TAC Case Management at $110.70 per hour** [5] this is in contract to the **NDIA hourly price limit for Level 2 Support Coordination at $100.14**. TAC Case Management is priced 10.55% higher.

Over the past three Years TAC has raised the price it sets for this service. DIA believes TAC will do so again this year based on CPI trend.

TAC Price for Case Management vs NDIS Support Coordination Level 2 over time



8.2.3. NSW ICARE INJURY MANAGEMENT CONSULTANT

iCare the NSW Workplace Injury Scheme utilises a function that is similar in nature to that of Level 3 Specialist Support Coordination called an Injury Management Consultant.

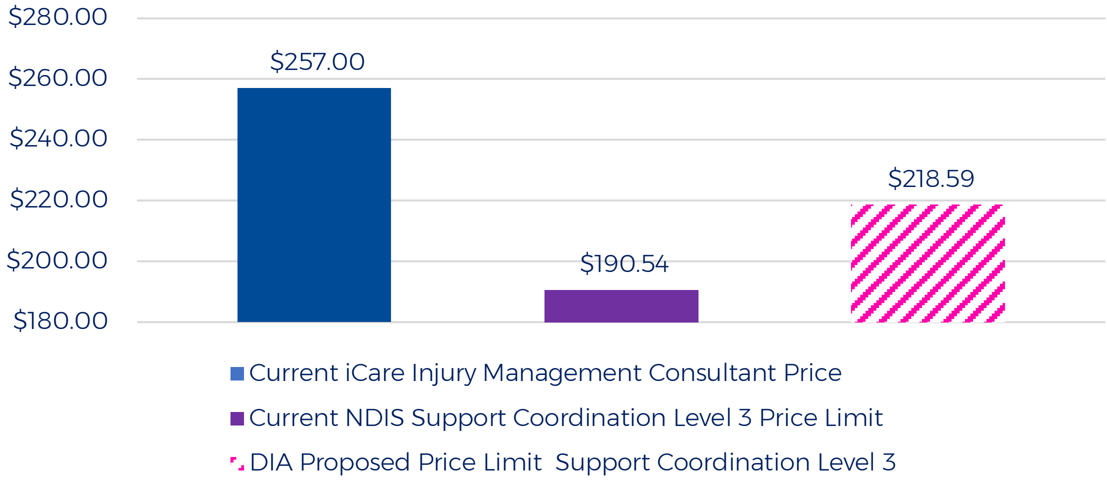
A referral to an Injury Management Consultant (IMC) may occur when a worker has been identified at risk of delayed recovery or injury management issue has been identified or referral has been requested by the nominated treating doctor or other treating practitioner.

An IMC looks at the persons situation and circumstances and discusses possible solutions with all parties across mainstream and community settings. The IMC negotiates with parties to seek agreement on actions and outcomes and sets a plan in place to overcome the barriers or complex issues identifies.

[5] TAC Case Management Fees - https://www.tac.vic.gov.au/providers/invoicing-and-fees/fee-schedule/case-management

Like with Specialist Support Coordination, IMC are not responsible for directing treatment or supports to the person. Rather they are there to support decision making, build/maintain capacity and resolve barriers to supports and outcomes.

Price for iCare Injury Management Consultant vs NDIS Support Coordination Level 3 as at 1 July 2023



iCare Injury Management Consultants are priced 34.85% higher than Level 3 Specialist Support Coordination.

8.2.4. LAC

Participants are supported to implement their plan with the support of either an LAC / PITC or funded for Support Coordination. It is important to note that Support Coordinators provide more than just navigation and plan implementation support and as such the below is not comparing like for like services or participant need.

However, despite Support Coordinators providing a high level of support to participants with more complex support needs they are funded per hour at significantly less than an LAC, save for Level 3. Support Coordinators deliver a significant saving to the NDIS whist producing greater outcomes.

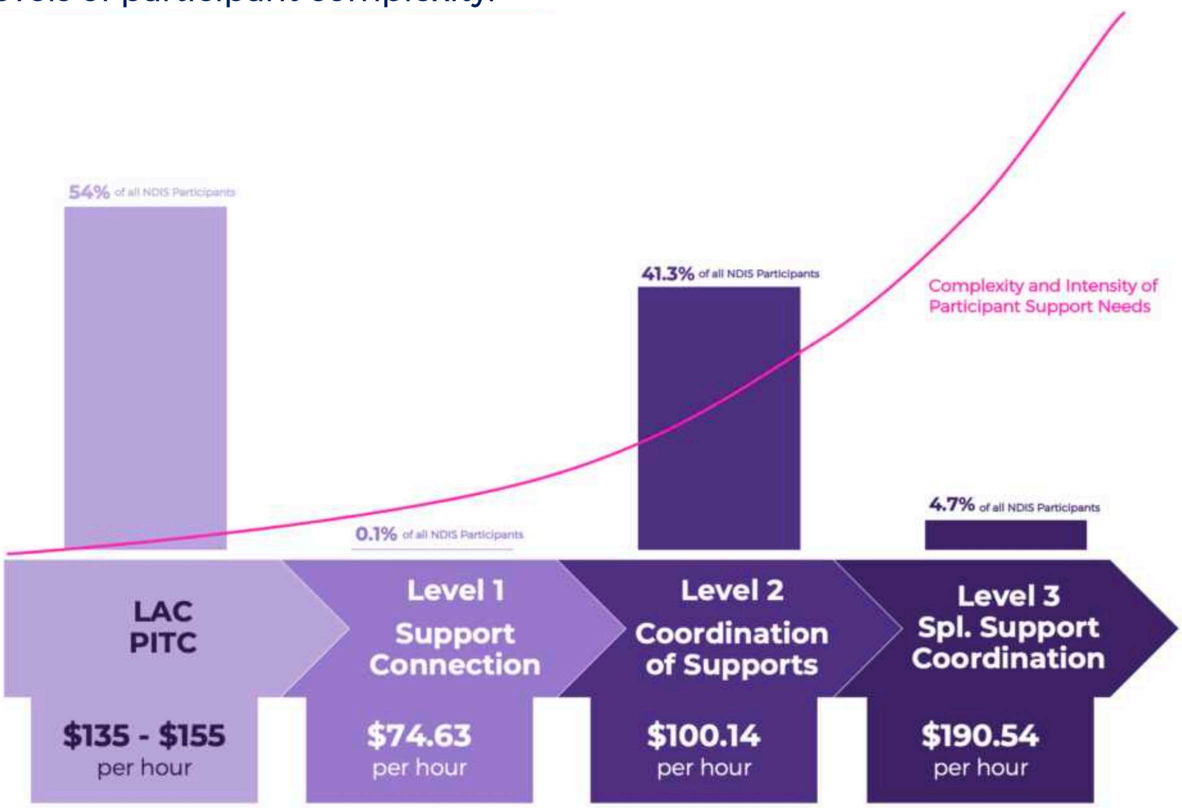
The closest Support Coordination level to the service delivered by LAC is Level 1 Support Coordination (Support Connection). Which is currently 48.53% less than the hourly cost of an

Last Year Support Coordinators Saved the NDIS around $508M, whist supporting participants with more complex support needs.

LAC. What is even more telling is that Level 2 Support Coordination is 30.94% less than the hourly LAC cost.

DIA understands that if all participants receiving Level 1 and Level 2 Support Coordination were to be supported by an LAC / PITC for the year ending 31 Dec 2023 it would cost the scheme an additional **$508M**[6], assuming the same number of hours of participant support.

Participant Plan Implementation Supports by percentage of total NDIS participants supported by each level, the hourly price limit / rate against the levels of participant complexity.



With the recommendations of the NDIS Review and Royal Commission now published. The NDIA must give full consideration to closing the pricing gap between LAC's and Support Coordination to ensure that a quality market is maintained as the NDIS looks towards implementing the outcomes of the NDIS Review, particularly to combining of LAC, PRC and Support Coordination into Navigation.

[6] 2022-23 NDIS Annual Pricing Review Report - https://www.ndis.gov.au/media/6051/download?attachment

8.3. SCHEME FUNDING FOR SUPPORT COORDINATION

This year's 2023-24 Annual Price Review consultation paper states:

"Total payments for support coordination supports in the September 2023 quarter reached $268 million, constituting 3% of the total Scheme expenditure. This reflects a 19% increase from the $225 million spent in the September 2022 quarter."

For the NDIA to utilise a singular quarter of total payment data for support coordination is misleading and does not adequately translate to the flow of scheme funds to providers as funds are not block funded rather funded on an individual basis based on reasonable and necessary criteria.

Total NDIS Support Coordination payments ($) for the year ending 31 Dec 2023 vs 31 Dec 2022 for all NDIS Participants nationally.

Year	SC Payments ($m)	% of Participants funded with SC	Average SC Payment Per Participant for the 12 months	Change between the 2022 and 2023
31 Dec 23	$1,029.0	46%	$3460	2.90% Increase
31 Dec 22	$861.9	45%	$3362	

So, to suggest there has been a 19% increase does not tell the full story. In reality the main reason for the 19% figure is simply the growth in NDIS Participant numbers, this is the demand side of the supply and demand equation. The amount of funding for Support Coordination nationally has only increase 2.9% per participant or about half of CPI increase.

The total NDIS plan inflation was 11.2% for the 12 months to 31 December 2023, Support Coordination is not a significant driver for NDIS Plan inflation given the Support Coordination increase of just 2.90%.

When we continue to dive deeper into the drivers for the Support Coordination 2.90% increase it becomes even clearer that a small number of plans, for participants in SIL, are driving a large increase (18.06%) whilst most Support Coordination funding has remained flat at 0.31% increase. Given the inflation rate of Australia in real terms funding has gone backwards.

NDIS Support Coordination payments ($) for the year ending 31 Dec 2023 vs 31 Dec 2022 for NDIS Participants in SIL nationally.

Year	SC Payments ($m) for SIL Participants	Number of Participants in SIL	Average SC Payment Per Participant in SIL for the 12 months	Change between the 2022 and 2023
31 Dec 23	$177.5	33,581	$3460	18.06% Increase
31 Dec 22	$133.5	29,812	$3362	

NDIS Support Coordination payments ($) for the year ending 31 Dec 2023 vs 31 Dec 2022 for NDIS Participants not in SIL nationally.

Year	SC Payments ($m) for non SIL Participants	Number of Participants in not SIL with SC funding	Average SC Payment Per Participant not in SIL for the 12 months	Change between the 2022 and 2023
31 Dec 23	$851.0	263,786	$3,226	0.31% Increase
31 Dec 22	$728.4	226,478	$3,216	

This shows that for over 87% of participants funded with support coordination the total amount of funding that have received year on year has been flat. This is also supported based on the price limits being frozen and operational processes that the NDIS uses to determine Support Coordination funding.

"In simple terms the demand for the support has increased, the per participant cost to deliver the support has increased and yet the per participant funding has remained flat or has gone backwards in real terms."

8.4. NUMBER OF PARTICIPANTS WITH SUPPORT COORDINATION FUNDING

This year's 2023-24 Annual Price Review consultation paper states:

"In the September 2023 quarter, 223,913 participants (35% of all active participants) utilised support coordination services, marking a 14% increase from the same quarter in 2022."

This statement from the NDIA is concerning given the figures stated in the Q1 23-24 NDIS Quartey Report showed that 45% of all NDIS Participants were funded with Support Coordination. This would suggest that 10% of all NDIS participants are not utilising their Support Coordination funding at all within the quarter.

DIA can hypostasise that this could be in part due to a reasonably larger number of NDIS Participants not being adequately funded for support coordination such that they are able to access support coordination year-round. Such as where there is 12 hours funded for support coordination.

8.5. SUPPORT COORDINATION MARKET SIZE, GROWTH AND EXITS

This year's Annual Price Review consultation paper states:
"A total of 7,459 providers delivered support coordination supports and received payments in the September 2023 quarter, a rise of 32% from the previous year."

This statement by the NDIA is concerning. The NDIA published quarterly reports show a very different picture of the Support Coordination market. In the same September 2023 quarter, the NDIS reported that a total of 990 Support Coordination providers[7] were active in the registration group. **This would indicate that only 13% of the total number of Support Coordinators active in the September 2023 quarter were registered with the NDIS Commission.**

What is even more concern is that in the December 2022 Quarter 49% of active Support Coordinators were Registered[8]. **This would indicate that within just three quarters (Dec 22 to Sep 23) 36% of registered Support Coordinators became not active, did not renew their registration or ceased their registration.**

In the 2022-23 Annual Pricing Review Report published in June 2023, the NDIA stated:

"registered providers delivering support coordination supports still make close to 90% of total cost of claims for support coordination supports."

Given this the impact of such a reduction in the percentage of registered providers delivering Support Coordination is concerning.

It should also be noted that using the 'number of active providers' as a data point for justification to or not to adjust the price limit for a particular support is extremely flawed. In previous submissions DIA has demonstrated that there is a significant number of larger Support Coordination Providers that have exited and ceased services with the former workers of that organisation becoming sole traders to continue supporting the NDIS Participants they used to under the former company. This results in 1 provider exiting and numerous entering. This in turn looks like a healthy vibrant market but dig a little deeper and its far from it.

From 31 Dec 2020 to 31 December 2022 the number of active registered providers delivering a range of NDIS supports has grown by higher or similar

[7] NDIA Q1 23-24 Quarterly Report Supplement E Table E.116 - https://data.ndis.gov.au/media/3860/download?attachment

[8] 2022-23 NDIS Annual Price Review Report - https://www.ndis.gov.au/media/6051/download?attachment

amounts to that of Support Coordination however these supports have warranted a significant increase to their respective price limits over that period whilst continuing to freeze the Support Coordination price limits.

	Quarter to 31-Dec-20	Quarter to 31-Dec-22	Percentage of Change in num of registered providers	Percentage of increase the support price limit
Assistance services: Assistance with daily life tasks in a group or shared living arrangement	1,492	2,310	**54.83%**	**20.57%**
Assistance services: Daily Personal Activities	2,224	3,086	**38.76%**	**20.57%**
Assistance services: Participation in community, social and civic activities	2,457	3,441	**40.05%**	**20.57%**
Capacity Building Services: Assistance in coordinating or managing life stages, transitions and supports	2,255	3,187	**41.33%**	**20.84%**
Capacity Building Services: Community nursing care for high needs	665	899	**35.19%**	**7.43%**
Choice and control support services: Support Coordination	587	858	**41.17%**	**0%**

DIA has seen and reported a significant number of exits from the Support Coordination sector, with a larger number of these being larger providers.

DIA supports new entrants to the market but to claim or infer that this increase in the number of providers is a sign of a healthy market demonstrates the consistent lack of market monitoring currently being undertaken by the NDIA.

Since 1 July 2022, DIA's market analysis and view of new members indicates that around 78% of the 'new providers' entering the market are in fact employees of former exited providers.

This has been achieved by monitoring market exits and comparing that with new business registrations (ABN data, NDIA Provider Finder, DIA Membership Data and Other Public Provider Finders) that have been established to deliver services in the NDIS.

Generally, these 'new' small and sole trader organisation have limited supervision capacity, professional development processes, systems, compliance measures etc. Ultimately diluting the level of quality and increasing the service variability across the market.

"We have started planning to close our doors. If we don't see a significant price increase for Support Coordination, we will be forced to exit this year."
DIA Member NSW

There have been over 50 media articles associated with large Support Coordination providers ceasing services. Below are a small sample of these:

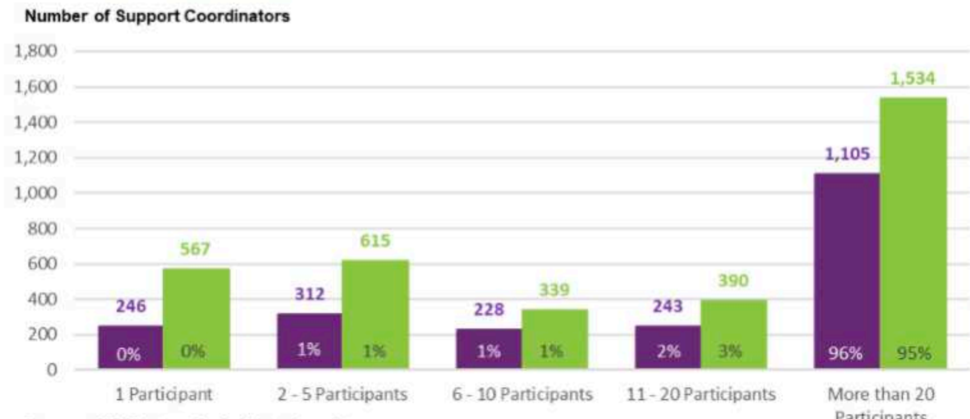
- The Courier - Uniting to cut NDIS support coordination service in Ballarat https://archive.md/rdSr6
- The Daily Telegraph - NDIS provider ditches vulnerable Queenslanders https://archive.md/azgPa
- Insurance Business - NDIS price freeze triggers support coordinator exodus https://archive.md/IAydc
- ABC - Anglicare Tasmania retreating from NDIS, citing 'not sustainable long-term' provision of services. https://archive.md/B1Q4G
- ABC - NDIS providers facing 'increasing amounts of losses', industry body warns as Anglicare Tasmania steps back. https://archive.md/VYT5u
- The Advertiser - Encompass axing: Hole in vital services https://archive.md/eOlea
- The Advertiser - $660ph charged by Encompass administrators as staff ask when entitlement will be paid - https://archive.md/MMXI4
- RiotAct - Woden Community Service ceases NDIS support services, calls for change to price limits. https://archive.md/AduEy
- NDIS provider GoodHuman forced into liquidation owing nearly $3m https://archive.md/89FVC

This sentiment is supported by a significant number of our members and the broader sector. DIA has for some time been concerned about the impact of a systemic lack of supply should these providers all seek to exit.

In last year's Annual Price Review Report the NDIA considered Business Dynamism with the June 2023 report stating:

"6.3 Business Dynamism
Figure 25 shows the breakdown of registered providers by the number of participants they have been servicing and the percentage claimed of their services, where the general profile of the registered support coordinators appears to have not changed significantly from the first half of 2020 to second half of 2022. Half-years are defined as the six-month time intervals from January to June and July to December."

FIGURE 25: REGISTERED PROVIDERS OF SUPPORT COORDINATION AND NUMBER OF PARTICIPANTS CLAIMED, JANUARY 2020 – DECEMBER 2022



Source; NDIS internal administrative data

There are numerous issues with this analysis, the most glaring though, is that it caps the groups out at ‘more than 20 Participants’. The average case load for a single Level 2 Support Coordinator (where 90% are funded) is around 25 participants. This clearly shows that the Small and Sole trader organisations are the provider size that delivers likely viability. Given that vast majority of the registered providers captured deliver supports to less that 25 participants.

Given the chart is for registered providers, the NDIA must recognise that a Support Coordination business needs to deliver service to between 5 and 15 Participants depending on the number of funded hours within a participant’s package, in order to just recoup the registration costs.

Based off the above business Dynamism analysis 1,716 (or 50%) of the 3,445 registered Support Coordinators are not servicing enough participants to even cover the cost of registration let alone any other overheads like wages, entitlements, rent and outgoings.

The simple truths of the Support Coordination market is that there is a large number of Quality providers that have exited / cease services, with hundreds more signalling that they will also need to cease services, if significant price limits are not increased are not accepted by the NDIA.

8.6. SUPPORT COORDINATION QUALITY

At the Disability Royal Commission Public Hearing 32, the NDIA General Manager Provider & Market Development stated that the NDIA receives **‘anecdotal feedback’ from participants about the variable quality of support coordination.**

This statement that has been repeated by the NDIA countless times since 2020. Given this DIA has to question why pricing has not been established to support increased quality and transition. Instead of focusing on efficiency which is leading to reduced quality within the sector to remain viable.

DIA sees significant causation between an increase in quality variability and the NDIA and its pricing policy. When prices are frozen for four years in a row, high quality providers which in the main cost more to operate are forced out of the market, whilst lower cost lower quality providers are able to continue.

This along with a significant underinvestment in market monitoring and sector stewardship by the NDIA and sector regulation by the NDIS Commission has created the market that operates today.

8.7. SUPPORT COORDINATION COST INCREASES

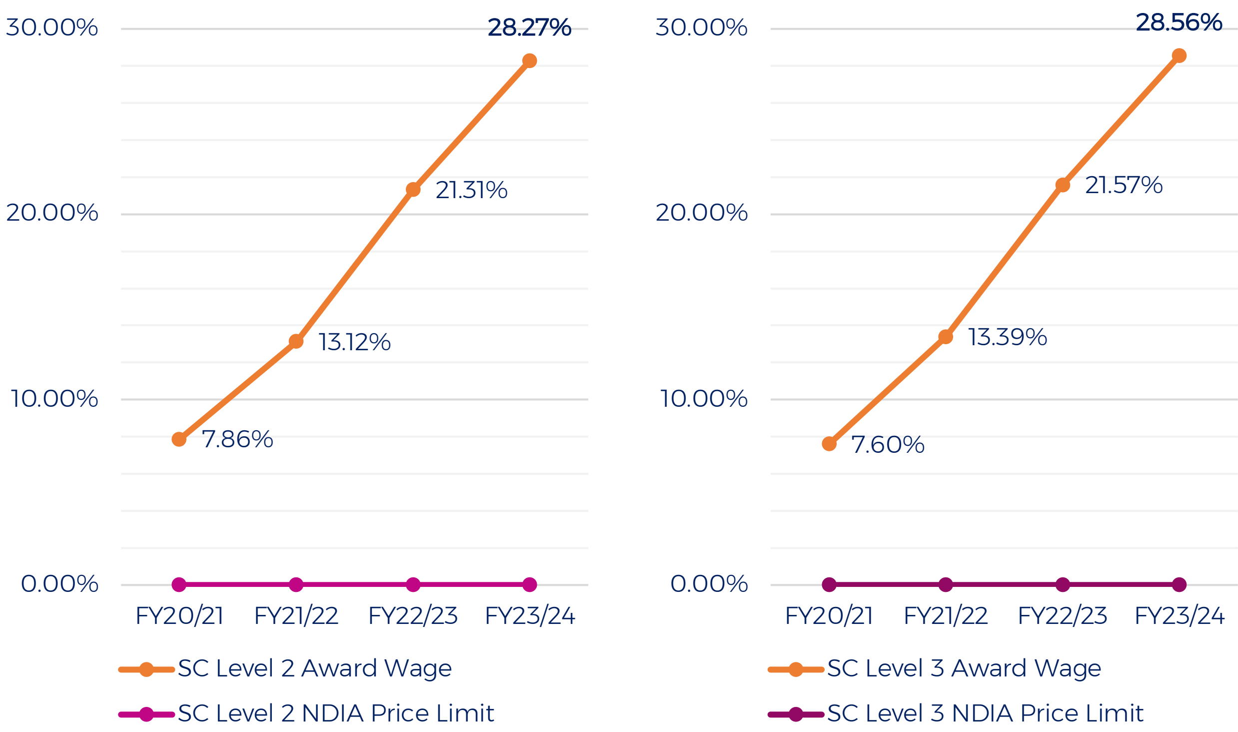
Since 1 July 2020, the past four years, Level 2 and Level 3 Support Coordinators have been forced by the NDIA to absorb significant cost increases with no ability to pass these on to the consumer (NDIS Participants).

8.7.1. WAGE COSTS INCREASES

Level 2 and Level 3 Support Coordinators have been forced by the NDIA to absorb significant cost increases in wages costs with no ability to pass these on to the consumer (NDIS Participants).

DIA is supportive of wage increase for our sectors workforce, however, there has to be recognition of this in NDIA's price limits and arrangements.

Cumulative percentage growth of wages vs SC price limit over time – Support Coordination Level 2 left Support Coordination Level 3 right

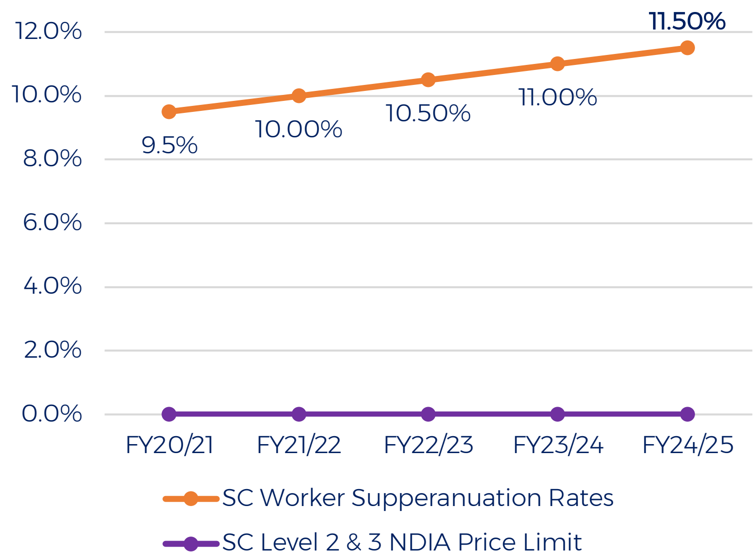


8.7.2. SUPERANNUATION INCREASES

Level 2 and Level 3 Support Coordinators have been forced by the NDIA to absorb significant superannuation increases with no ability to pass these on to the consumer (NDIS Participants).

DIA is supportive of wage increase for our sectors workforce, however, there has to be recognition of this in NDIA's price limits and arrangements.

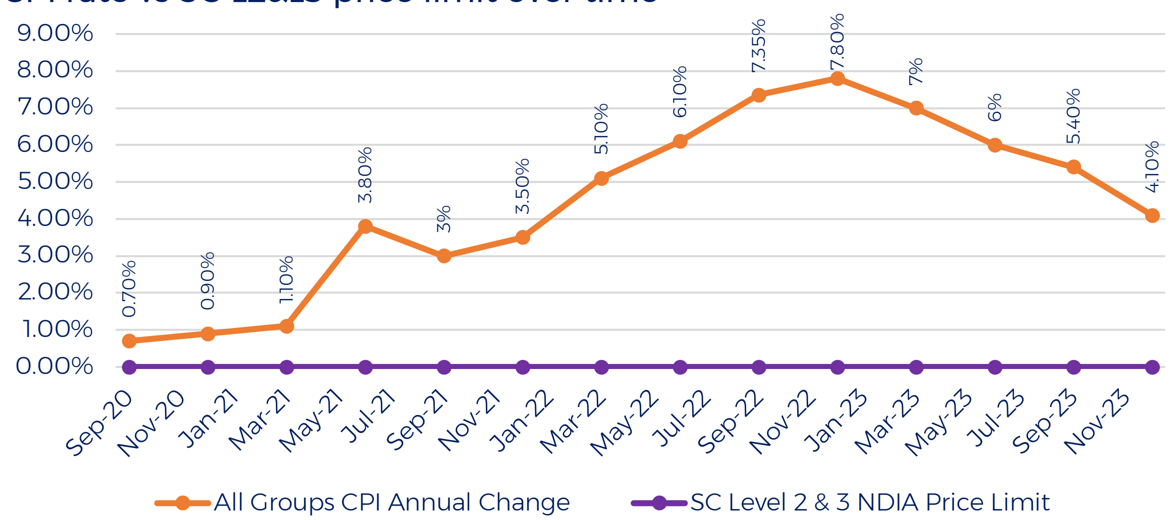
Change superannuation guarantee rate vs SC price limit over time.



8.7.3. CPI RISES

Level 2 and Level 3 Support Coordinators have been forced by the NDIA to absorb significant increases in the costs of doing business.

CPI rate vs SC L2&L3 price limit over time[9]



Further to this point the Reserve Bank of calculates **the inflation change from 1 July 2020 to 31 December 2023 to be 16.8 per cent** or an average annual inflation rate of 4.0 per cent[10]. This has not been passed on to the Support Coordination Level 2 and Level 3 price limits.

[9] ABS Data - https://www.abs.gov.au/statistics/economy/price-indexes-and-inflation/consumer-price-index-australia/latest-release

[10] Reserve Bank of Australia - https://www.rba.gov.au/calculator/annualDecimal.html

8.8. SUPPORT COORDINATION BENCHMARKING RESPONDENT PROFILE

At the time of closing responses to DIA's benchmarking program, DIA had received 865 individual responses from Support Coordination providers. In terms of the survey's representation of the broader Support Coordination market, of the 865 responses received 89% identified as 'For Profit' and 11% as 'Not for Profit'.

Support Coordination Survey Reponses by Organisational Structure

Structure	Number of Responses	Percentage of Responses
For Profit	770	89%
Not for Profit	95	11%

The respondent's coverage of the States and Territories showed a high proportion of respondents in the three larger jurisdictions (NSW, Victoria and Queensland) which highlights the more local nature of Support Coordination.

Support Coordination Survey Responses by Jurisdiction of Participants Serviced
Total responses and percentage of responses are greater than the 865 and 100% as respondents service multiple jurisdictions.

Jurisdiction of Service	Number of Responses	Percentage of Responses
ACT	95	11%
NSW	363	42%
NT	69	8%
QLD	199	23%
SA	147	17%
TAS	104	12%
VIC	138	41%
WA	54	16%

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 19%, 'Medium' represented 49% and 'Large' represented 32% of the survey.

Support Coordination Responses by Number of Participants Supported

Size by Number of Participants	Number of Responses	Number Change from prior year	Percentage of Responses	Percentage Change from prior year
Small	372	▲ 342	43%	▲ 24%
Medium	337	▲ 114	39%	▼ 10%
Large	156	▲ 11	18%	▼ 14%

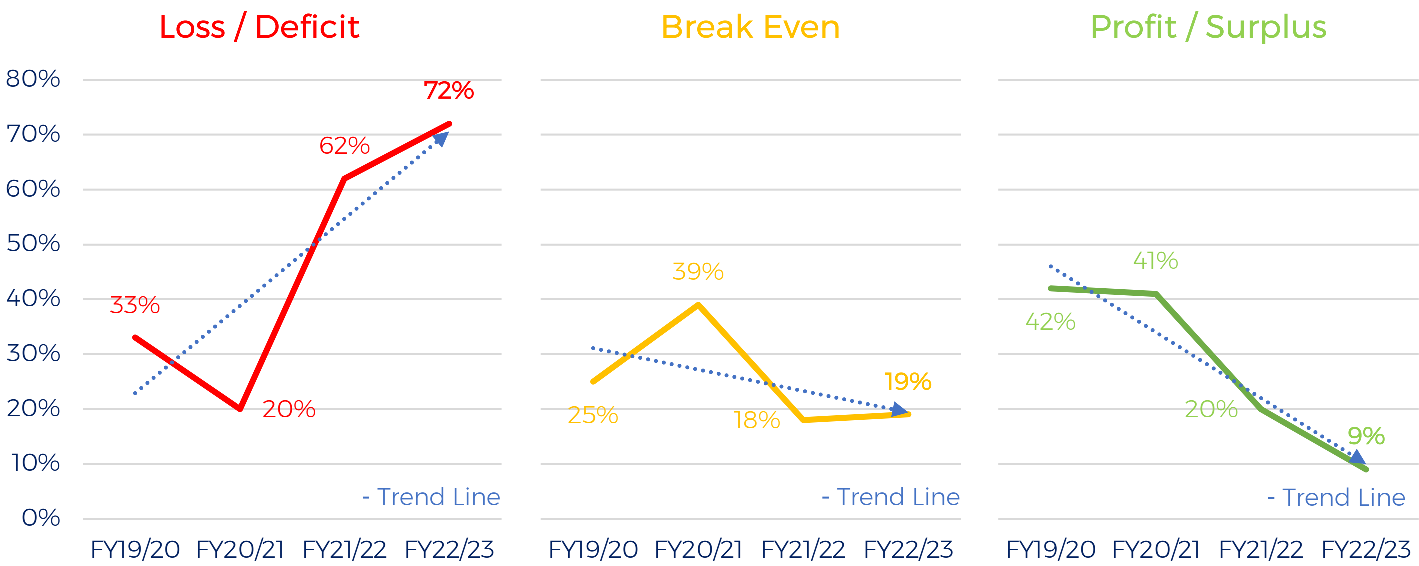
8.9. FINANCIAL RESULTS – SUPPORT COORDINATION

The survey responses showed that 91% of respondents reported that they made a Loss / Deficit or Break-Even, with only 9% of the respondents reporting a Profit / Surplus.

Support Coordination Responses by Financial Result

Financial Result 22/23	Number of Responses	Percentage of Responses	Percentage Change from prior year
Loss / Deficit	623	72%	▲ 10%
Break Even	164	19%	▲ 1%
Profit / Surplus	78	9%	▼ 24%

DIA Benchmarking - Support Coordination Financial Results Over Time



The above illustrates that over the past four financial years the percentage of Support Coordinators making a loss or deficit has increased sharply, the percentage of Support Coordinators making a profit / surplus has decreased sharply, the percentage of Support Coordinators breaking even has decreased more slowly.

It should also be noted that FY20/21 is an outlier result for the Support Coordination Sector due to temporary COVID measures including the ability for Participants to use their core funding flexibly to purchase Support Coordination as well as payments to support Participants to get vaccinated. These measures masked the underlying trends of reduced viability for Support Coordination providers.

Analysis of the financial results data shows that organisations categorised as 'Small', 'Medium' and 'Large' continue to show that viability decreases along with growth and scale. Organisations categorised as 'Large' have a 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.

Percentage of Financial Result by Respondent Organisational Size

Size of Organisation	% Loss / Deficit	% Break-Even	% Profit / Surplus
Small	65%	22%	13%
Medium	77%	17%	7%
Large	79%	16%	5%

The organisational structure showed some minor differences in terms of financial results from the survey with the percentage of respondents reporting a Profit only significantly different for large provers. All other response is similar across the two categories.

Percentage of Financial Result by Respondents Organisational Structure

Structure	% Loss / Deficit	% Break-Even	% Profit / Surplus
For Profit	73%	18%	9%
Not For Profit	66%	23%	11%

Overall, the survey results showed that only 9% of the respondents returned a 'Profit / Surplus' for the 22/23 Financial Year with organisational structure playing only a minor factor in determining the financial outcome, with not-for-profit entities reporting marginal better financial performance over for-profit entities.

The survey results would indicate that there is a small 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. With some further minimal benefit in being a not-for-profit entity.

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.

This is further supported in the data of providers ceasing service and exiting.

8.10. BENCHMARKING RESULTS – SUPPORT COORDINATION

The Support Coordination Survey consisted of series of areas of exploration. This year DIA continued with requesting specific data points to ensure greater consistency and specificity in responses. Any unreasonable responses that were outside a reasonable margin of error were followed up to confirm or be amended by the respondent.

General themes include:

a. Viability Concerns.
b. Market Exits.
c. Increases in workforce costs with no ability to pass these on to the consumer given price limits.
d. Inflation pressures impacting operation and corporate overheads.

e. Registration costs, respondents reporting registration audit costs of $15,000 or over.
f. Increasing costs on compliance and reporting activities to both the NDIA and NDIS Commission.
g. Inadequate quantity of support (volume of hours).

8.10.1. 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.

Percentage of Respondents by Award / Agreement – Workers (Participant Facing)

Award / Agreement	% of Respondents	% Shift in the past 18 months
SCHADS	94%	▲ 2%
Other	6%	▼ 2%

Percentage of Respondents by Award / Agreement – Supervisors

Award / Agreement	% of Respondents	% Shift in the past 18 months
SCHADS	92%	▲ 1%
Individual Agreement	7%	▲ 0.5%
Other	1%	▼ 1.5%

8.10.2. BASE RATE OF PAY

The DIA benchmarking survey asked respondents to indicate base levels of pay for Levels 1, 2 and 3 Support Coordination and for 'Supervisory' workers at each of the three levels.

This year DIA requested a specific pay point to ensure greater consistency and specificity in responses. Any unreasonable responses that were outside a reasonable margin of error were followed up to confirm or be amended by the respondent.

Base rate of pay for Support Coordination Levels 1, 2 and with Supervisors

	Mean	10PC	25PC	50PC	75PC	90PC
Level 1: Support Connection - Worker	$37.33	$37.14	$37.33	$37.33	$37.53	$37.79
Level 1: Support Connection - Supervisor	$49.06	$48.86	$49.06	$49.06	$49.26	$49.63
Level 2: Coordination of Support - Worker	$49.06	$48.80	$49.06	$49.06	$49.39	$49.75
Level 2: Coordination of Support - Supervisor	$59.50	$59.27	$59.50	$59.50	$59.82	$59.95
Level 3: Specialist Support Coordination - Worker	$69.93	$69.64	$69.93	$69.93	$70.05	$70.23
Level 3: Specialist Support Coordination - Supervisor	$74.01	$73.84	$74.01	$74.01	$74.22	$74.43

The per hour base pay rate for Support Coordination Supervisors was consistent across organisational size and structure, save for Sole Traders where final profit excluding all other costs were considered the ‘wage rate’.

8.10.3. DIRECT ON-COSTS

The DIA benchmarking survey asked respondents about the costs of employment associated with Superannuation entitlements, Annual Leave entitlements, Personal Leave entitlements, Long Service Leave entitlements and Employee Allowances.

This year DIA requested a specific amounts, dollars, hours and percentages to ensure greater consistency and specificity in responses. Any unreasonable responses that were outside a reasonable margin of error were followed up to confirm or be amended by the respondent.

Direct On-Costs for Support Coordination Levels 1, 2 and 3

	Mean	10PC	25PC	50PC	75PC	90PC
Annual Leave - Hours accrued in a year	152	152	152	152	152	152
- Loading	17.5%	0%	17.5%	17.5%	17.5%	17.5%
Personal Leave - Hours accrued in a year	76	76	76	76	76	76

Public Holidays - Hours of public holidays	106	91	106	106	114	121
Superannuation - 2023-24 Rate	11%	11%	11%	11%	11%	11%
- 2024-25 Rate	11.5%	11.5%	11.5%	11.5%	11.5%	11.5%
Workers Compensation - Allowance Rate	2%	1.5%	2%	2%	2%	2.5%
Allowances - Allowance Rate	1%	0%	1%	1%	1%	1.5%

8.10.4. OPERATIONAL OVERHEADS

The DIA benchmarking survey asked respondents about Operational Overheads including those costs which are in the operational control of the provider such as workers compensation costs, utilisation costs, supervision costs and workforce rostering and balance measures such as the share of the workforce that is permanent or casual, the extent to which overtime is used by the business, and blending to a flat fee rate factoring afternoon, weekend and public holiday rates etc.

DIA captured a specific amounts, dollars, hours and percentages to ensure greater consistency and specificity in responses.

Any unreasonable responses that were outside a reasonable margin of error were followed up to confirm or be amended by the respondent.

Operational Overheads for Support Coordination Levels 1, 2 and 3

Total Operational Overheads per hour ($)	Mean	10PC	25PC	50PC	75PC	90PC
Level 1: Support Connection	$19.34	$18.90	$19.34	$19.34	$19.56	$19.95
Level 2: Coordination of Support	$38.17	$37.97	$38.17	$38.17	$38.50	$38.66
Level 3: Specialist Support Coordination	$90.70	$90.37	$90.70	$90.70	$91.04	$91.36

8.10.5. CORPORATE OVERHEADS

The DIA benchmarking survey asked respondents about Corporate Overheads including the costs incurred to run the administrative side of their business.

These costs include the accounting, human resources, legal, marketing, compliance and technology functions.

The NDIA in its Disability Support Worker Cost Model assumes that Corporate Overheads are 12.0% of direct costs. However, it also includes a temporary loading which recognises the variable costs of COVID and of adjusting to the new provisions in the Social, Community, Home Care and Disability Services Industry Award 2010 (SCHADS Industry Award) that were come into effect on 1 July 2022. DIA notes that Support Coordination Levels 2 and 3 did not receive this loading despite the impacts of the Changes to the SCHADS Award.

Our benchmarking program demonstrates that actual corporate overheads should, at a minimum, be considered around 14% of direct costs. This is due to several factors including increased inflationary pressures driving higher costs of accounting, human resources, legal, marketing, compliance and technology functions.

This year DIA requested a specific amount, in dollars, hours and percentages to ensure greater consistency and specificity in responses. Any unreasonable responses that were outside a reasonable margin of error were followed up to confirm or be amended by the respondent.

Corporate Overheads for Support Coordination Levels 1, 2 and 3

Total Corporate Overheads per hour ($)	Mean	10PC	25PC	50PC	75PC	90PC
Level 1: Support Connection	$9.98	$9.76	$9.98	$9.98	$10.31	$10.66
Level 2: Coordination of Support	$15.00	$14.72	$15.00	$15.00	$15.14	$15.47
Level 3: Specialist Support Coordination	$26.32	$25.94	$26.32	$26.32	$26.57	$26.85

8.11. SUPPORT COORDINATION COST MODEL

DIA propose the use of the below cost model, which has used to determine our 2023-24 annual price review Recommendation One, see 5.1 above.

Cost Model for Support Coordination Levels 1, 2 and 3

	Level 1 Support Connection	Level 2 Coordination of Support	Level 3 Specialist Support Coordination
Award	SCHADS 3.1	SCHADS 5.1	SCHADS 8.3 + Loading
Standard Hourly Rate	**$37.33**	**$49.60**	**$69.93**

	Level 1 Support Connection	Level 2 Coordination of Support	Level 3 Specialist Support Coordination
Direct On Costs			
Annual leave			
a. No. hours leave accrued in a year (hrs/yr.)	152	152	152
b. Loading	17.50%	17.50%	17.50%
c. Proportion of leave taken	100%	100%	100%
Cost per worked hour	**$3.99**	**5.30**	**7.47**
Personal leave			
a. No. hours leave in a year (hrs/yr.)	76	76	76
b. Loading	0%	0%	0%
c. Proportion of leave taken	100%	100%	100%
Cost per worked hour	**$1.70**	**2.25**	**3.18**
Public Holiday leave			
a. No. hours leave accrued in a year (hrs/yr.)	76	76	76
b. Loading	0%	0%	0%
c. Proportion of leave taken	100%	100%	100%
Cost per worked hour	**$1.70**	**$2.25**	**$3.18**
Long Service leave			
a. No. hours leave accrued in a year (hrs/yr.)	32.93	32.93	32.93
b. Loading	0%	0%	0%
c. Proportion of leave taken	100%	100%	100%
Cost per worked hour	**$0.73**	**$0.98**	**$1.38**
Superannuation			
Superannuation Rate (%)	11.50%	11.50%	11.50%
Superannuation per worked hour	**$5.14**	**$6.83**	**$9.63**
Employee Allowances			
Allowance Rate (%)	1%	1%	1%
Allowance Cost per worked hour	**$0.45**	**$0.59**	**$0.84**
Cumulative cost/hour, after Direct On-costs	$51.93	$69.00	$97.28
Increase from standard hourly rate	28.11%	28.11%	28.11%

	Level 1 Support Connection	Level 2 Coordination of Support	Level 3 Specialist Support Coordination
Operational Overheads			
Cumulative cost/hour, before Operational Overheads	$51.93	$69.00	$97.28
Operational Overheads ($)	$19.34	$38.17	$90.71
Cumulative cost/hour, after Operational Overheads	$71.27	$107.16	$187.99
Increase from standard hourly rate	47.62%	53.72%	62.80%

	Level 1 Support Connection	Level 2 Coordination of Support	Level 3 Specialist Support Coordination
Corporate Overheads			
Cumulative cost/hour, before Corporate Overheads	$71.27	$107.16	$187.99
Corporate Overheads (%)	14.00%	14.00%	14.00%
Corporate Overheads ($)	$9.98	$15.00	$26.32
Cumulative cost/hour, after Corporate Overheads	$81.24	$122.17	$214.30
Increase from standard hourly rate	54.05%	59.40%	67.37%

	Level 1 Support Connection	Level 2 Coordination of Support	Level 3 Specialist Support Coordination
Margin			
Cumulative cost/ hour, before Margin	$81.24	$122.17	$214.30
Margin (%)	2.00%	2.00%	2.00%
Margin ($)	$1.62	$2.44	$4.29
Cumulative cost/hour, after Margin	$76.65	$118.14	$212.59
Increase from standard hourly rate	2.68%	2.02%	1.43%

	Level 1 Support Connection	Level 2 Coordination of Support	Level 3 Specialist Support Coordination
Final Hourly Price Limit - National	**$82.87**	**$124.61**	**$218.59**
Final Hourly Price Limit - Remote	*$116.01*	*$174.45*	*$306.03*
Final Hourly Price Limit - Very Remote	*$124.30*	*$186.91*	*$327.89*

8.12. SUPPORT COORDINATION UNFUNDED WORK

DIA has explored a number of areas of unfunded work, where Support Coordinators currently gap fill inefficiencies in the NDIS including:

- LAC under performance, capacity shortages and capability deficiencies.
- PACE administrative burden being placed on Support Coordinators to support the creations of 'my provider status'.
- Planners' inadequate communication of decisions and error in planning (such as supporting a participant to understand their rights).
- NDIA inadequate communication about scheme design and principles.
- Mainstream interface gaps where people with a disability fall between multiple services systems.
- Costs associate with supporting the conclusion of supports and services after a NDIS participant has passed away.

Many of these areas relate to the quantity of funding put into a participants plan, i.e. the number of hours and not specifically a price limit or pricing arrangements, save for the cost associated with the passing of a NDIS Participant.

8.12.1. BEREAVEMENT COST FOR SUPPORT COORDINATORS

DIA recommends that Support Coordinators be able to claim for reasonable costs and work undertaken by Support Coordinators after a participant's passing. Last year the NDIA created a Bereavement Policy however did not investigate or consider Support Coordinators applicability to this new pricing arrangement. DIA asked our members how much time on average they spent delivering work in an unfunded capacity after a participant's death.

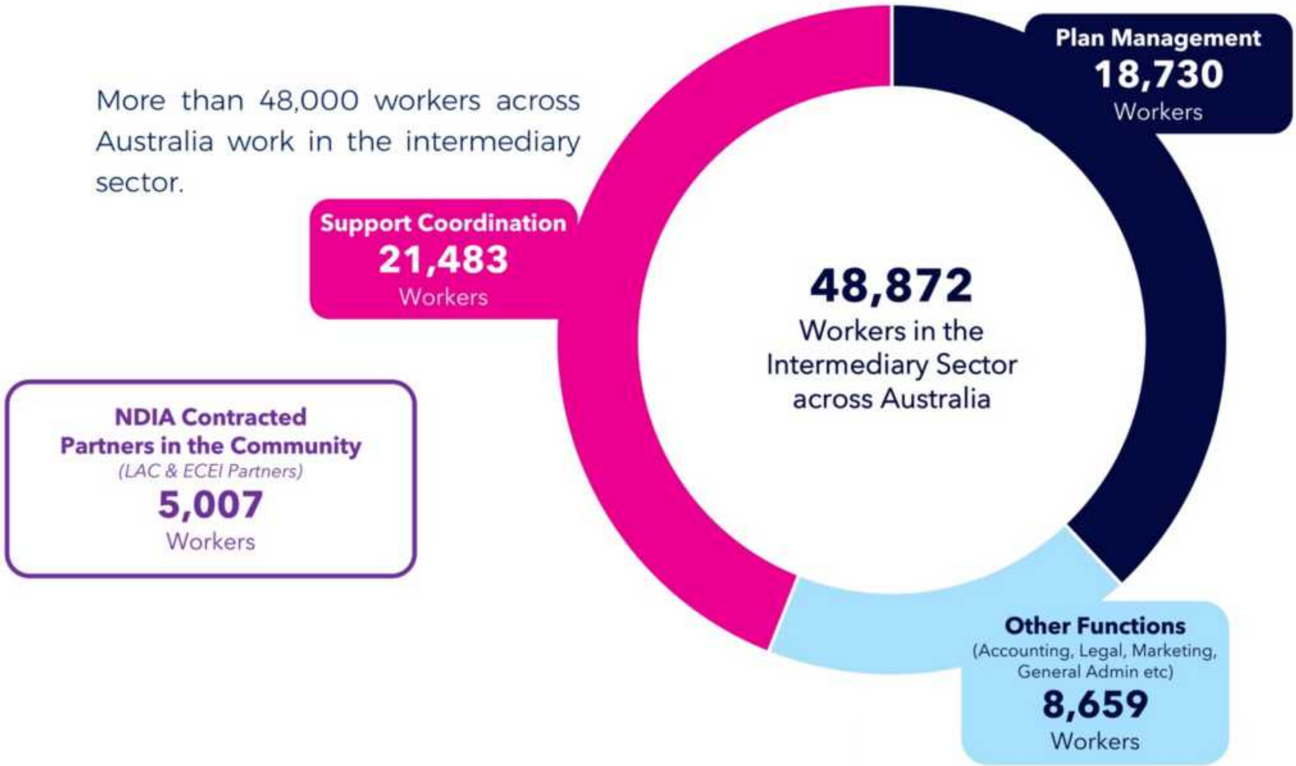
Number of hours of unfunded work for Support Coordination Levels 1, 2 and 3 where a participant has passed away.

Total Corporate Overheads per hour ($)	Mean	10PC	25PC	50PC	75PC	90PC
Level 1: Support Connection	10	5	9	10	11	12
Level 2: Coordination of Support	10	6	9	10	13	18
Level 3: Specialist Support Coordination	10	8	9	10	15	22

Support Coordinators should be able claim up to 10 hours in the 30 days after a participant's death where they are required to undertake Coordination activities (e.g. Coordinating the ceasing of services with providers, ensuring providers promptly make claims for services delivered prior to the participants passing and providing a report(s) to the NDIA as requested etc.) in respect of a participant.

9. INTERMEDIARY WORKFORCE

More than 48,000 workers across Australia work in the intermediary sector.



Disability Intermediaries Australia

Intermediaries.org.au