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Joint Standing Committee on the National Disability Insurance Scheme
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Parliamentary Inquiry into NDIS - ICT Systems

Greenacres is a Not for Profit disability service provider based in the Illawarra. Greenacres has 65 years of experience in supporting people with disability to meet their individual needs and achieve their goals.

Participant and Provider Experiences of the MyPlace Portal

Inefficiencies

Like most organisations in the Disability sector, Greenacres have invested heavily in new IT infrastructure; IT systems and process implementation; and we have been building internal IT expertise to ensure we have the capability to capture and claim for services delivered in the new NDIS environment. The efficiencies we expected from this significant investment have not been realised. This is due to the increased administrative burden exacerbated by the number and type of rejections we are having to manage on a weekly basis.

We have appointed a full time NDIS Systems/Program Manager and part time Claims Administrator to manage the systems and process requirements for the capture of NDIS services, claims, rejections and reconciliation. These two appointments were necessary, but have added to our ongoing NDIS administrative costs. There is also increased administrative demand on our Support Coordinators at the frontline, who are in contact with participants and their families in an effort to assist the Greenacres NDIS team with resolving rejected claims.

Myplace Portal Reports: Based on the NDIS Weekly Payment Summary reports over the last two months, unsuccessful claims averaged at around 8%, with around 65% of these being directly related to claim amounts being greater than the service booking. Around 15% were attributed to multiple errors including service booking issues. This means that for all providers claiming through the NDIA Portal, up to 80% of all rejected claims can be attributed to service booking issues each week.

Greenacres Portal Reports: Below is an example of Greenacres NDIS claims, rejections and error reasons discussed during a recent NDIS weekly review meeting. Although percentages may vary slightly from week to week, the issues outlined below are indicative of issues outlined over previous weeks and months by Greenacres Senior Managers and NDIS Intake teams.

- The Greenacres rejected claims rate has spiked to around 15%. We have kept the rejection rate to this level by reviewing rejected claims by participant, and withholding all further claims for those services where we expect ongoing rejections. This may occur where we have discovered that plans have been ended early and we are awaiting updated service agreements to be signed for example.

- Of the rejected claims we receive each week, around 90% are attributed to service booking errors
- Of these service booking errors, around 79% are due to there being no current service booking
- The remaining 11% are due to insufficient funds in the service booking

Please note that the errors above are only estimates as we are not able to generate error reports out of the portal to be completely accurate with error rates and reasons. To address this issue, high level rejected claims reviews are broken down by individual participant as part of the error resolution process. The most common reasons for the errors outline above are due to actions taken by the NDIA. For example:

- Future service bookings deleted by the NDIA when NDIS Plan ended earlier than the original end date
- Current service bookings ended early when NDIS Plan ended earlier than the original Plan end date
- Current service booking funds pro-rated when NDIS Plan ended earlier than the original Plan end date

There are two reasons that NDIS Plans are ended early:

1. Unscheduled Review – providers accept that where a review is driven by the participant, and the participant will benefit from the updated reasonable and necessary supports in a new plan, then the previous plan should be ended early to allow for the additional supports to be provided. Unfortunately, the participant is not provided with a start date for the new plan in advance of receiving the plan, and is generally only aware their new plan has been activated when we contact them about rejected claims.

According to the NDIA Terms of Agreement, providers have up to 60 days to claim for services delivered. The NDIA are not adhering to their own Terms of Agreement when they pro-rata amounts in service bookings and leave insufficient funds for providers. Insufficient funds results in rejected claims. The NDIA must ensure providers have the full 60 day period to claim for services delivered where plans have ended earlier than the original end date.

2. Scheduled Review – Large numbers of plans are currently being reviewed in our region as participants' transition into year two of the full rollout. Unfortunately this process has caused a spike in rejected claims as the NDIA activate participant plans early. In the majority of cases participants are unaware that their current plans are going to be ended early. By ending plans early, the NDIA are denying the participant the ability to fully utilise the funds associated with their reasonable and necessary supports.

Rework impact on support workers and back-office staff:

- Service bookings ending unexpectedly due to early start to a new plan causes claims to be rejected.
- Where plans are ended early funding is reduced causing claims to be rejected due to insufficient funds.
- Participants increasingly have a plan manager on their new plan which means invoices generated for the previous plan are no longer valid and must be regenerated which involves work by support workers and back-office staff.
- Services already delivered after a plan has unexpectedly expired cannot be claimed until a new Service Agreement and updated quote for services is signed by the participant, and a new service booking is made in the Portal. Greenacres has continued to provide support services to participants during this period, but cannot claim for services provided without a signed service agreement. The process to sign a new service agreement can take several weeks to resolve which creates ongoing cash flow issues.
- Where a plan manager or support co-ordinator is introduced in the new plan, the time period to be able to make a successful claim is at least 4 weeks and frequently longer.

Underpayment of invoices

Unit prices for ADE funding were not updated in the NDIA portal when the new prices came into effect on 1 July. Post 1 July 2018, the NDIA is paying below the expected claim amounts. Part payment of an invoice creates significant additional work for Greenacres' back-office staff in managing reconciliations and part-paid invoices.

Case study: Early end to participant plan during scheduled review

One of our NDIS participants had a Plan which included funding to participate in competitive sporting events. The Plan had sufficient funds to pay for the participant to attend a national sporting event to participate in his chosen sport. The participant's parents were going to be overseas, and they had arranged for Greenacres to provide the transport, and day/overnight support to allow the participant to participate during their absence. A quote was generated and agreed to, and the service booking was created in the NDIA portal.

Just prior to the sporting event, the participant and the parents attended a Plan review. The expectation was that the current plan end date would stand, and the parents flew overseas expecting Greenacres to support the participant at the sporting event. Without notice, the NDIA ended the participants plan and deleted the future service booking. There was now no service agreement or funding to ensure the participant could attend and participate in the sporting event. Greenacres did not have a new Service Agreement for the new plan, and there was no provision in the new plan for this event as it fell within the previous plan start and end dates.

We contacted the local NDIA office and after a flurry of emails and phone calls we were able to reinstate sufficient funds to support the participant. The unexpected early end to the plan and subsequent processes to reinstate the funds created a high level of concern, upset and frustration for all parties involved – particularly the participant. The amount of time and effort required by the participant, family members, the NDIA staff and Greenacres staff to resolve this issue was significant, and this is just one example, for one participant, for one of their service bookings, with one service provider. The financial and emotional costs associated with this issue can be replicated multiple times across a timeline involving numbers of participants and their providers.

Despite these costs, the NDIA have not provided any evidence to participants or providers about the benefits of ending an NDIS Plan earlier than the plan end date for scheduled reviews. The process only seems to create uncertainty for participants and providers, it denies participants their right to utilise all of their approved funds, and denies providers their right to claim for up to 60 days after the end of the service booking. Ending a plan early and reducing available funding does not support the terms and conditions outlined the NDIS Terms of Agreement.

Portal Access Issues for registration

There have been numerous issues related to the registration process. An example is the Greenacres GM Finance and Governance, who (due to multiple portal errors) went back and forth with the NDIA over a three month period to finalise his registration details. Our Quality and Risk Manager has been trying to register and has received the following message "Sorry, we have experienced internal server issues, try again later".

Poor Release Management processes

Portal changes currently occur as and when required based on NDIA internal requirements. Releases generally require outages which impact the work of providers. Currently providers may be advised that outages will occur but not given clear time-frames that would allow effective staff planning. For example, Greenacres employs a staff member to complete billing and claims to the portal three days a week. If the portal is unavailable to complete claims then the claim process can be delayed by up to a week and this in turn delays payments.

The NDIA needs to provide a roadmap of changes and a release plan so that providers and software vendors know: when major releases are going to occur; what is in a release; and what is required to prepare their systems for those changes.

Outage windows should be published in advance and should ideally occur outside of business hours to minimise disruption.

There also needs to be better communication of portal changes to local NDIA offices. Local NDIA staff in our experience are advised of the changes at around the same time as providers, and are not provided with any

support documentation or advice so they can respond to provider questions. This means that even basic questions have to be escalated for clarification. Greenacres is still working with our local office to find the answers to some of our initial questions related to the 1 July 2018 changes.

Lack of Support.

As a provider of supported employment and SLES support, the NDIA appear to have very limited knowledge regarding issues related to these support types.

An example of a question raised in the first week of July 2018 is outlined below. The response was provided to us on 3rd August 2018 after further follow up from Greenacres.

Question: Do we have confirmation on the SLES and DMI amounts for 2018/19? We have some general correspondence with content about rates, but would like confirmation on the weekly claimable amounts please.

Answer: These items are not price controlled, meaning that providers can charge any price agreed with the participant. However, participants will receive limited funding for these supports, based existing DSS and state scheme funding as appropriate.

The NDIA is aware that many providers and participants are seeking further information on typical funding levels for these supports. Further information on these will be published shortly.

Please note: We are currently being paid less than the claim amounts for DMI levels which suggests there is a price control in place in the portal. Despite this price control, we are still awaiting confirmation of the new prices from the NDIA.

The appropriateness of the MyPlace Portal and agency facing IT systems

Lack of reporting/notification.

Providers agree that recent changes to the Portal which allows for providers to edit service bookings will assist in reducing portal errors, however providers still have no ability to generate basic reports from the Portal to support business processes. One example might be a report which would allow providers to reconcile against expected remaining funds in participant service bookings for example.

Currently, providers are required to log into the portal, search an individual participant, then log into each individual service booking for that participant just to ensure that it is still active and has the expected funds remaining. There is no ability for providers to run a report which can support a provider reconciliation process, and the current process is an exceptionally onerous one (and clearly not sustainable long term).

Greenacres has over 550 participants receiving services so it is not feasible to monitor participant information in the portal individually on a day-to-day basis in the portal for changes that have been made by the NDIA.

Of our 550+ participants, we have over 60 known plan reviews currently taking place (we have temporarily suspended portal claims for this group). We also have over 40 plans that the NDIA has ended early, without any notice to Greenacres. Our claims for these participants will be rejected by the portal due to insufficient funds or no service booking until such time as we can arrange a new service agreement with the participant. Claim rejections is the main way we find out about new plans being implemented early.

Equally, providers currently have no ability to generate an 'exceptions report' showing where the NDIA has adjusted (pro-rated) service booking amounts, or has cancelled future service bookings for example. It is not realistic to rely on participants to notify providers of changes to service bookings or plan date changes, particularly as they are often unaware of the changes including unplanned earlier end dates themselves.

Even the current compromise that the NDIA has agreed to of making plans active close to the planned end date as possible is inadequate as it causes claims to be rejected and services already delivered have to be rescheduled and rebilled to the portal on the new plan.

The NDIA needs to implement a date-driven system to allow new plans to start and end on schedule as per the original plan dates. The only exception to this should be where an unscheduled plan review has occurred, and in this case all affected providers should be informed of any changes to plan end dates and associated service bookings before they are made.

Inefficiency of Plan-Managed processes

Greenacres is concerned with the number of participants who have plan managed plans without requesting a plan manager at their review meeting. The number of year two plans coming through with plan management has increased significantly, yet in some cases plans are for supports that can only be provided by registered providers. Examples include participants who have supported employment (DMI funding) in their plan, and yet those supports are being plan managed. If only Disability Enterprises can offer supported employment, then including a plan manager for this support makes no sense at all and is a waste of NDIA funds.

Greenacres' experience with plan managers has varied from 'efficient and supportive' to 'difficult' with some providers who (due to a lack of experience or knowledge for example) can create unnecessary barriers and add to the complexities of the claiming process. Delays in payment are not uncommon with some plan management providers, and the NDIA has been clear that providers are expected to resolve issues with plan managers directly and that they are not available as an escalation point in relation to these issues.

Greenacres supports a change to the claims process for plan and self-managed participants who receive services from registered providers. Instead of providers sending claims to plan managers and self-managed participants to claim from the portal, it would be more efficient for Greenacres to send these claims to the portal and plan managers and self-managed participants can then approve the payment in the portal.

The impact of ICT infrastructure on the implementation of the NDIS

Opportunity Cost

Like many providers Greenacres supports participants and their carers who may have very little or no experience with technology, and our energies are diverted to supporting those families who need support navigating the NDIS.

The diversion of key resources to support ICT systems and processes means that providers like Greenacres may find it difficult to not only maintain the highest standards of services and support, but also have the ability to be innovative, creative and drive growth strategies within this highly competitive environment.

It is important to note that non-registered providers who provide supports to self-managing participants are at a competitive advantage, not only because they are not bound by the same compliance obligations for example, but also because they deal directly with the participant. This means they do not need to access the portal, and are therefore not constrained by the NDIA portal system and process issues faced by registered providers.

Agency managed participants, especially those with intellectual disability and participants with older carers or from CALD backgrounds, have found the transition to the NDIS confusing and confronting. The most common concern raised by ageing carers is the level of uncertainty they now feel. Many not only struggle with ICT infrastructure, but also their roles and responsibilities in the NDIS environment. Opportunity costs for participants and their families may include: a reduction in supports as they try to navigate an unfamiliar and complex system; CALD groups being under-represented if they are not supported through the process; plus the feeling of uncertainty about future supports and services (particularly concerning for ageing carers).

Lack of consultation with software vendors

It is clear that the portal was designed with little regard to the needs of registered providers. As a provider, you cannot generate any type of report from the Portal that contains participant data (Participant Name and NDIS Number for example), even where the participant has agreed to share their information with you.

Currently plan and service booking information for participants in the portal must be manually rekeyed into Greenacres' systems to create a schedule of supports and track budgets once we have service agreements in place.

Manual entry of data from one system into another leads to errors. Where information in a participant's plan or our service booking is modified by the NDIA, our information is no longer up to date with the portal and this results in rejected claims. Generally we would not know that our information is out of date until we get a claim rejection.

A secure API interface into the portal (such as a webservice) would allow providers to access information in the portal and retrieve it efficiently for use in their secure systems. This would eliminate errors caused by manual data entry and would allow providers and software vendors to develop systems independently, without being bound by the limitations of the NDIA portal. Consultation with the Disability sector and software vendors is recommended to ensure the solution design and available data is fit for purpose.

The lack of information on the NDIA Portal roadmap is a current and urgent issue for Greenacres. With the current lack of direction from the NDIA, providers (including ours) are generating their own roadmaps and potentially creating changes which will not meet business or compliance requirements ongoing. This will be costly in both time and money for providers and vendors alike.

Greenacres would like to see much greater collaboration and consultation with providers to find ways to make the NDIA Portal work more efficiently and effectively.

Software Vendor engagement

Currently vendors that provide software solutions to the disability sector find out about NDIA changes when those changes are implemented. Once the changes are advised, there is insufficient information to design a solution that complies with NDIA requirements. The NDIA is not responsive to technical questions. There is no test portal environment to validate software solutions prior to moving a solution into production.

Case study

The 1 July 2018 price guide included a number of changes that impact software solutions, including the implementation of claim status messages into a bulk payment request and a mandated payment at 90% of unit price for cancellations with short notice up to 12 times per 12 month plan.

The NDIA advised these changes could be phased in but there was no consultation or information provided prior to 1 July 2018. There is still insufficient technical documentation to describe how software vendors should implement changes to comply with NDIA requirements. Greenacres and our vendor, CompliaHealth, have separately sent questions to the NDIA to clarify how the claim status changes will work. To-date neither Greenacres nor Compliahealth have received answers to our questions.

The NDIA does not currently provide a test environment to allow validation of bulk payment requests. This means that our vendor's solution will be delivered and deployed to our production (live) environment without knowing whether the NDIA portal will accept or reject it.

If the NDIA portal rejects our bulk payment request file, the vendor will need to go through further development and test cycles to rectify issues. Depending on the nature of the rejection this could be very costly as the introduction of "cancellation" status requires broader system modifications to manage the requirement to bill up to 12 cancellations without notice at 90% of the support item unit price.

Cost of poor software vendor engagement

There are significant costs borne by the Disability Sector, which cannot be recouped as a result of the current situation of poor engagement with software vendors, including: higher software vendor licensing costs due to rework as a result of unclear NDIA compliance requirements; higher staff costs to work with vendors to make solutions compliant; and significant administration overheads for rework and remediation due to the impact on operations of non-compliant solutions.

Things need to change

The NDIA needs to develop an engagement model to work collaboratively with software vendors and registered providers in the Disability Sector to ensure that compliance requirements can be met efficiently and cost-effectively. This requires:

1. An NDIA ICT roadmap.
2. Early access to information about upcoming releases and what changes are planned.
3. Provision of technical documentation where solutions are required to interact with the NDIA portal - three to six months in advance.
4. Access to technical experts at the NDIA to allow vendors to ask questions and receive responses in reasonable time-frames.
5. Provision of an NDIA portal test environment to enable vendors to test solutions.

Efficient management of payment errors

As part of the portal claims submission/rejection/review/resubmit and reconciliation processes, Greenacres has inadvertently charged twice for the same service on a few occasions. We have also identified which participants and services need to be credited in the portal service booking. These types of errors are not simply teething problems. Errors can and will always be made and an efficient process is required to manage them once they are identified.

The process to manage credits as documented in the NDIA Provider Toolkit, involves cancellation of a payment that will be handled by the NDIA in one of two ways:

- A reduction on a future payment; OR
- An invoice may be issued for the outstanding amount.

Both of these approaches have problems

The approach of reducing a future payment isn't a viable option as each payment we receive is remitted against invoices in our financial system using the claim reference we provide to the NDIA. Arbitrary reductions in future payments would result in invoices going unpaid that are valid and should be paid and leave us unable to reconcile payments received against invoices generated. The administrative overhead to manage this approach is too high to be acceptable.

The second option of issuing an invoice to the provider is a manually intensive process both for providers and for the NDIA. Financial information needs to be manually collated from our financial system and sent through to the NDIA via email. The NDIA then issues an invoice to the provider, the payment is made and the NDIA then needs to credit the correct service booking.

A more efficient process is required to manage credits

Correction of errors related to invoices in our financial system involves generation of a credit note which applies to a participant's available budget. Similarly Greenacres requires the ability to submit a credit note to the NDIA portal to be applied to our service booking. Greenacres could then make a payment to the NDIA that would reference the credit note which would allow the NDIA to match the payment against to the credit note which can then be reflected as an increase in budget on the service booking.

This approach would allow providers to resolve errors and return funds to the NDIA in an efficient and transparent way.

Technically the NDIA should develop a secure API to allow providers to interface credit notes to the portal using vendor delivered software solutions. This would allow for efficient solutions to be developed that don't require manual intervention to manage files.

The current options for managing credits are unacceptable band aid solutions which need to be replaced by system-based solutions that allow for automated management of credits. The NDIA would benefit from entering into a consultation process with software vendors and providers to develop an appropriate solution.

Other Related Matters

System Security

With the recent portal data breaches, providers expect that the NDIA will be particularly diligent with portal related data. In a recent case, Greenacres contacted the NDIA about our internal Administrator being unable to change our provider details online. During one of these calls, we manage to arrange for our email, address and phone number to be updated by NDIA portal support staff without any security questions to confirm identity.

Staff fatigue and the other costs of change.

Greenacres agrees with the Disability Trust regarding the increasing levels of fatigue related to the constant work-arounds required to manage portal and process changes initiated by the NDIA. Staff energies are diverted to an unfair playing field where ICT related changes are made without notice, yet service providers and their software vendors are required to respond in a timely manner to ensure we maintain our compliance.

Providers incur significant monetary costs with the implementation of every ICT change. The costs of internal and external resources to generate, test and deploy changes in internal NDIS related systems should not be underestimated. Where systems are integrated, changes need to be tested against user stories across all platforms, and this requires vendor input and generates costs associated with testing and implementation.

Recommendations

Greenacres agrees with all recommendations outlined in the submission provided to the Inquiry by the Illawarra Disability Alliance (Greenacres was a contributing member to this submission).

Conclusion

Greenacres believes that both the enhancements to the portal and changes in process are essential to create the necessary efficiencies so participants and providers can experience the full benefits of the National Disability Insurance Scheme.

Greenacres thank the Joint Standing Committee on the National Disability Insurance Scheme for the opportunity to provide feedback on the NDIS ICT systems, and look forward to participating in further discussions in the resolution of these issues. Should you require further information regarding this submission, please contact me on [REDACTED]

Yours sincerely

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