

Section	Finance
Procedure Title	NDIS Business Processes

1 RELATED POLICIES/DOCUMENTS

NDIS Business Processes Policy
 Accounts Payable Procedure
 Accounts Receivable Procedure
 Financial Transaction Cards Procedure
 Petty Cash Procedure
 Choice and Advocacy Policy
 Client Engagement and Participation Policy
 Client Related Plans Policy
 Service Delivery Policy
 Feedback & Complaint Policy
 Code of Conduct Policy
 Prevention of Fraud and Corruption Policy
 Conflict of Interest Policy

2 PURPOSE

To inform and provide direction pertaining to NDIS Business processes for all NDIS funded supports

3 RESPONSIBILITIES

General Managers, Managers, Supervisors, assigned support staff and the NDIS Officer

4 PROCEDURE

Business Processes:

The following procedures are to be implemented.

NDIS Registration and NDIS Provider Portal Access

- ConnectGV will review the NDIS Provider Toolkit as updated, including the Terms of Business for Registered Support Providers, to ensure required practices are in line with NDIS registration requirements.
- General Managers and CEO is identified and designated the role of NDIS Portal Manager. This position will identify those staff that require access to the Provider Portal and organise for them to register for PRODA, and then allocate their access level within the Portal.
 - NDIS officer and all General Managers will monitor Portal business and any NDIS alerts via the portal.
 - The CEO is responsible for monitoring updates from the NDIA regarding registration status, provider requirements and portal management.

Marketing

The CEO will be responsible for the development and implementation of marketing and promotional strategies.

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Structure and Engagement strategy with ConnectGV staff

- Supervisors/Team Leaders/Coordinators/General Managers will ensure all staff are aware of ConnectGV systems and processes that have been established for operating within the NDIS, including being able to explain what ConnectGV can offer and how to engage with current and prospective clients.
- General Managers/CEO will monitor sector information and training opportunities to share with staff to facilitate their skill and knowledge development around NDIS practices relevant to ConnectGV.
- Supervisors/Coordinators/Team Leaders/General Managers will be responsible for the development of a pre-planning support model.
- Supervisors/ Team Leaders/Coordinators/General Managers will provide training to relevant staff to implement pre-planning to meet transition timelines.
- Supervisors/Team Leaders and Coordinators will offer pre-planning to all current clients.

Engagement strategy with ConnectGV clients entering the NDIS

- General Managers will develop and implement a communication plan for ConnectGV for changes in service offerings under the NDIS to current clients. This will include web, face-to-face information sessions and written material.
- Supervisors/Coordinators/Team Leaders will offer support to current clients to attend NDIS planning meetings.
- Supervisors/Coordinators/Team Leaders/General Managers will be responsible for regular updating of clients on NDIS news and information.

Engagement strategy with new/potential ConnectGV clients entering the NDIS

General Manager Future Directions will develop a process for responding to requests for information from new client regarding the NDIS including providing assistance with checking NDIS eligibility.

Client Information Management Systems

- General Managers and NDIS officer will develop and monitor an entry point and tracking system for all client enquiries and responses, which includes generating quotes, service agreements and associated work flows for client business processes.
- General Managers and NDIS officer will ensure client information management and record systems identify a 'single source of truth' for client data. This includes service delivery tracking systems that records services delivered and meets NDIA audit requirements.

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NDIS and Conflict of Interest:

ConnectGV aims:

- To act in accordance with its values;
- To comply with its general and specific obligations as a registered provider of supports under the National Disability Insurance Scheme.

As a registered provider of supports under the National Disability Insurance Scheme, ConnectGV has responsibilities in relation to:

- managing conflicts of interest generally
- managing conflicts of interest in plan management and support coordination, and offering or receiving gifts, benefits and commissions.

Managing conflicts of interest generally

The NDIS Terms of Business for Registered Providers require providers to have policies about potential conflicts of interest in service delivery.

ConnectGV and its team members will ensure that when providing supports to clients under the NDIS, including when offering plan management or support coordination services, any conflict of interest is declared and any risks to clients are mitigated.

All employees will act in the best interests of NDIS clients and other clients, ensuring that clients are informed, empowered and able to maximise choice and control. Staff members will not (by act or omission) constrain, influence or direct decision-making by a person with a disability and/or their family so as to limit that person's access to information, opportunities, and choice and control.

Employees will ensure that ConnectGV proactively manages perceived and actual conflicts of interest in service delivery. Employees will:

- Manage, document and report on individual conflicts as they arise, and
- Ensure that advice to a client about support options (including those not delivered directly by ConnectGV) is transparent and promotes choice and control.

As required by the NDIA Terms of Business, all clients will be "treated equally, and no client [shall be] given preferential treatment above another in the receipt or provision of supports". (See note below.)

Managing conflict of interest in plan management and support coordination

Where separation of functions is viable

- General Manager Future Directions and NDIS officer is responsible for plan management and support coordination only.
- Reporting in regard to this will be separate to operational management

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- Clients will be presented with a range of choices about providers of supports and not only ConnectGV and staff will not seek to influence the client to select ConnectGV.
- Brief notes will be made in COSMO confirming the advice given to the client.

Where complete separation of functions is non-viable

When performing plan management and support coordination functions the following will be effected

- ConnectGV risk register includes the ongoing potential conflict of interest
- ConnectGV will undertake to declare to clients the potential conflict of interest of ConnectGV being both plan manager or support coordinator and a provider of other supports and affirm that the organisation will act as directed by the client and in the best interests of the client
- ConnectGV will emphasise feedback and complaint mechanisms and the right to receive support from an advocate should the client have any concerns about supports provided
- Brief notes will be made in COSMO confirming the advice given to the client.

Gifts, benefits, commissions, and the NDIS

ConnectGV or its staff must not accept any offer of money, gifts, services or benefits that would cause them to act in a manner contrary to the interests of an NDIS client. Further, employees must have no financial or other personal interest that could directly or indirectly influence or compromise the choice of provider or provision of supports to a client. This includes the obtaining or offering of any form of commission by employees or ConnectGV.

Cancellations and No-Shows

Cancellations

To cancel an appointment, clients can notify ConnectGV within business hours.

Where supports are cancelled with notice (as set out in the Service Agreement), no charge applies.

A cancellation is a short notice cancellation if the client:

- Does not show up for a scheduled support within a reasonable time, or is not present at the agreed place and within a reasonable time when the provider is travelling to deliver the support; or
- Has given less than two (2) clear business days' notice for a support that meets both of the following conditions:
 - The support is less than 8 hours continuous duration; AND
 - The agreed total price for the support is less than \$1000; or
- Has given less than five (5) clear business days' notice for any other support.

Where there is a short notice cancellation, or no-show, ConnectGV are able to recover 90% of the fee associated with the activity.

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There is no limit on the number of short notice cancellations, or no-shows, that ConnectGV can claim in respect of a client. However, ConnectGV will show a duty of care to the client if there is an unusual number of cancellations, and will seek clarification as to why they are occurring.

For other supports: The National Disability Insurance Agency does not permit charges against the NDIA plan and the client will be personally charged. Other charges at times when regular supports are provided will be detailed in the clients Service Agreement. The ConnectGV staff person assigned to deliver supports will record cancellation or no-show, in order for this to be captured at the time of invoicing.

Special circumstances

Charges may be waived if the client has experienced a catastrophe, e.g. emergency hospitalisation or a death in the family.

The decision to waive the charge will be made by a General Manager. The discretion not to charge does not apply in any other circumstances and is not exercisable by other staff.

Safeguarding and no-shows

In the event of a no-show, the employee rostered to support the clients will complete the following in sequence unless they are sure of the client's safety:

- phone the client to check on their safety (if appropriate to do so)
- if at the client's home
- Complete a home visit safety checklist if a home visit is deemed necessary
 - Attempt to contact family through a home visit
 - check if the client's vehicle is onsite (if applicable)
 phone the nominated emergency contact person
- contact the direct line management and seek direction on next steps.

ConnectGV supervisor/team leader/coordinator will:

- assess and determine the next steps including whether to persist with contacting the client, their emergency contact person or other authorities having regard to what is known about the client, their behaviours and risks, and
- advise your supervisor/team leader/ coordinator responsible for rostering of the no-show and make a decision regarding the staff person's next engagement (if relevant).

Debt Management:

Debt prevention and limitation

The General Manager, Finance is responsible for establishing effective billing processes and efficient payment collection methods.

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Effective billing processes

NDIS-funded supports ○ Agency-managed plans: Payment Request through NDIS Provider Portal; daily or weekly (or whatever other cycle is used depending on the unit of measure of the supports provided).

- Plan Management Provider: Invoice to Plan Management Provider - weekly/fortnightly/monthly.
- Self-managed: Invoice to client - weekly/fortnightly/monthly.

Non-NDIS funded disability supports other than therapy: Invoice to client; weekly; except for rent and other household expenses in Specialist Disability Accommodation, which is charged fortnightly in advance.

Non-NDIS therapy: Invoice to client; at time of delivery, for immediate payment.

Efficient payment collection methods

ConnectGV accepts the following payment methods.

NDIS-funded supports

- Agency (NDIA) Managed Plans: Bank transfer by NDIA
- Plan Management Provider: Credit card, bank transfer
- Self-managed: Credit card, bank transfer

Non-NDIS funded disability supports other than therapy: Credit card, bank transfer

Non-NDIS therapy: Credit card, direct debit.

Where payment is by credit card, the NDIS Price Guide does not permit the charging of a surcharge.

Debtor management

ConnectGVs business processes will ensure that all payments are recorded in COSMO and the finance system on a daily/weekly basis.

Outstanding debts are reviewed on a weekly basis by NDIS officer and/or General Manager, Finance. Discussion will then proceed with General Manager Future Directions as to appropriate action to be taken.

Records of all interactions with debtors are maintained in COSMO and or debtor management file.

The following processes apply.

- 14 days after issue of invoice: Payment due.
- 14-21 days after issue of invoice: Payment received in our bank account.
- 14-21 days after issue of invoice: Payment information entered in COSMO and the finance system.

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- 21-28 days after issue of invoice: Assigned Finance Officer runs debtors report. Calls client/carer. If successful in speaking to client/carer and in gaining assurance of prompt payment, records the promised date for payment in and emails client reminder. If not successful in gaining assurance of prompt payment, emails letter saying services may be withdrawn/ terminated if invoice not paid in 5 days. 33 days after issue of invoice:
 - Finance Department runs debtors report. Assigned officer calls client/carer. If successful in speaking to client/carer and in gaining assurance of prompt payment, records the promised date for payment in COSMO and emails client reminder. If not contactable, check COSMO and speaks to relevant General Manager of program area to check if client/carer is overseas, in hospital, etc. If no acceptable reason for non-payment, consider withdrawing/terminating services with immediate effect. If so, inform client in writing and advise supervisor/team leader/ coordinator rostering supports and staffing.
 - If the client has an NDIS Plan and is self-managing and there are doubts about the client's capacity to self-manage, contacts NDIA.
 - Emails final demand letter requiring payment in 2 days, and stating that unless payment is received in that timeframe, recovery will commence through a debt collection agency without further notice.
- 35 days after issue of invoice (unless client/carer known to be overseas, in hospital, etc.): if debt not paid, General Manager of program area ensures that services withdrawn/ terminated with immediate effect if this has not already occurred. Informs client in writing and advises relevant supervisor/team leader/coordinator.
 - Provides latest relevant information to General Manager Finance.
 - General Manager Finance with relevant program area General Manager: to subsequently decide action to be taken (for example, arrangements for debt collection, or repayment plan. Make recommendation for further action in writing to CEO.

Finalising debts

The relevant General Manager of program area together with the General Manager Finance may propose that the CEO accept a reasonable request for payment by instalments, provided agreement is reached on the terms and the timeframes. Such agreements are to be in writing and confirmed by both parties, with a copy to the relevant program area General Manager and General Manager Finance.

In the event of a payment default, the full amount of the debt will become due for payment and will be referred to the ConnectGV debt collector.

Prior to referring a debt to a debt collection agency, the General Finance Manager and the CEO will confer about whether it is uneconomic to finalise recovery action, for example, if the debt is of relatively small value. If so, a recommendation shall be made in accordance with who holds the delegation to write-off debt.

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Reporting to Executive and Board on debts

As part of the standard financial reports, the General Manager shall provide a written report to the Executive management team and to the Board each month on the amount and age of debts, the action taken, and the rationale for the any write-off of debt.

5 DEFINITIONS

Cancellation and No-Shows:

- Cancellation With Notice: Cancellation of the scheduled delivery of supports with at least the notice as required by the Service Agreement.
- Cancellation Without Notice: Where no notice or less than the notice period required by the Service Agreement has been given.
- No-show: When a client does not attend the service, is not available, or is not at the agreed location to receive a scheduled support.

Debt Management:

- Agency Managed Plan: For clients who are NDIS clients, a method of managing supports in a plan whereby ConnectGV receives payment from the NDIA via the NDIS Provider Portal.
- Plan Management Provider: For NDIS, a third party registered provider that assists the client to manage the funded supports in their plan. ConnectGV invoices the Plan Management Provider, which then pays ConnectGV.
- Self-managed: For clients who are NDIS clients, a method of managing supports in a plan whereby the client is responsible for managing their supports and paying ConnectGV directly.

COSMO: The ConnectGV Client Management System

Finance System: The ConnectGV Financial Accounting System

6 RELATED FORMS

Service Agreement

NDIS Code of Conduct

NDIS Terms of Business

Accountable	CEO
Responsible	General Manager Finance
Review Date	July 2022

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Revision History

Version	Approved/ Amended/ Rescinded	Approval Date	Management	Committee/ Board	Document Reference
V1	Approved	13 Feb 2018	S Cloney	Operations	Finance
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