

Making a submission to the 2023-2024 Annual Pricing Review: Checklist



About this checklist

This checklist has been developed to support NDS members make a submission to the [NDIS 2023-2024 Annual Pricing Review Provider Consultation Paper](#). It was developed based on feedback on members and provers who attended short briefing sessions facilitated by NDS staff.

The checklist includes advice on these questions:

1. Have you included information about your organisation?
2. Have you identified what areas of the Annual Pricing Review you will respond to?
3. Have you detailed your direct staffing costs?
4. Have you included all relevant overhead costs?
5. Have you highlighted other factors that are influencing your costs?

We also provide helpful hints on writing your submission.

Throughout the checklist we have provided some examples of what members may like to include when responding to the questions in the consultation paper. However the list is not exhaustive and members are advised to seek their own advice if required.

Members may also find the following resources helpful:

- Responding to the NDIS 2023-2024 Annual Price Review Consultation Paper: Practical guidance for members [\[PDF\]](#) [\[Word\]](#)
- 2023-2024 NDIS Annual Pricing Review: Suggestions for Members Presentation Briefing Session Presentation [\[PDF\]](#) [\[Word\]](#)

How to use this checklist

While we have included a broad range of areas that members may like to include in their submission, you do not need to cover every dot point.

You may like to focus on one area such as overheads or direct staffing costs and use the prompts that we have listed. Or you may like to just focus on the one or two points areas that are most important to your organisation. For example under overheads you may like to just concentrate on non-billable activities undertaken by your staff if this an area that significantly impacts your costs.

Checklist prompts

Remember you do not need to include information on each of these areas. Choose the ones that are most relevant to your organisation and that illustrate the impact of pricing on your organisation.

Have you included information about your organisation?

A brief overview of your organisation – where you are located, when and how your organisation commenced, length of time operating, role in the community, vision etc

Services you provide and where you provide them

Number of participants and participant profile (if relevant you may like to include other information eg: age, average support needs particularly if your organisation supports significant number of participants with more complex support needs.)

Number of staff you employ (if relevant you may like to provide some workforce demographics. For example if your organisation employs a large number of workers from diverse backgrounds).

Include links to your website and annual report.

Have you identified what areas of the Annual Pricing Review you will respond to?

Identify what consultation paper questions/topics you will be responding to.

Gathered the data sources/evidence that you will use in your submission.

This could include:

- Annual Financial Statements
- Financial budget and YTD financial reports
- Payroll information
- Quotes for any relevant expenses. For example insurance premiums, quality audit etc

Identified what information you will provide as an attachment or link to in your submission.

Identified what information you consider to be confidential.

Have you detailed your direct staffing costs?

Number of workers (and percentage they represent of your DSW/participant facing workforce and frontline supervisors) employed across your organisation.

For reference the DSWCM is based on the following four classifications:

- DSW One: Social and Community Services Schedule 2.1
- DSW Two: Social and Community Services Schedule 2.4/3.1
- DSW Three: Social and Community Services Schedule 3.2
- DSW Four: Social and Community Services Schedule 4.

Your base average wage for each role across your participant facing workforce/ frontline supervisors and a brief rationale for this.

For example:

- Wage competition for allied health professionals and early childhood educators.
- Actual impact of increases in aged care wages.
- Complexity of supports being delivered.

Leave assumptions as outlined in the DSWCM versus your costs:

- Number of public holidays in your state/ territory compared to DSWCM assumption (10 days).
- Annual leave allowances. For example the SCHADS Award requires employers to provide five weeks of annual leave to staff employed as shift workers (DSWCM assumed 20 days). Other organisations may provide additional leave as a retention measure.

The number and proportion of your workforce that is employed on a permanent and casual basis and as full time or part time.

Number and proportion of vacancies across your organisation.

Number and proportion of vacancies across your organisation. Examples of how the make up of your workforce impacts your organisation. For example supervisor to staff ratios in response to a high proportion of part time staff, use of overtime and agency staff in response to workforce shortages.

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| <p>Number and proportion of vacancies across your organisation. Quantifying the impact of non-billable/non-funded participant facing activities and providing a short case study or example of why your organisation is undertaking these. Support coordinators should consider providing additional detail on non-billable work.</p> | <p>Examples include:</p> <ul style="list-style-type: none"> • Non-billable travel (for example beyond the current limits of 30 minutes/60 minutes). • Non-billable case conferences/case meetings. • Non-billable training/team meetings/professional development/client related administration activity by participant facing staff/frontline supervisors. |
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Have you included all relevant overhead costs?

Your most recent worker’s compensation premium compared to the previous year.

Your most recent insurance premium compared to the previous year. As an example the ABS report that insurance costs (across the general community including home and contents, vehicle insurance etc) have increased by 16.2% over 12 months.

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| <p>Any costs that you are able to attribute to compliance.</p> | <p>This could include:</p> <ul style="list-style-type: none"> • the cost of your most recent audit. • the number of EFT in your organisation employed to support compliance activities. • training (cost of the training and the time required for staff to complete training) that is required to meet NDIS registered provider (or other regulatory system) obligations. For example to meet the High Intensity Support Skills Descriptors (if relevant). |
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| <p>Your overhead costs compared to the previous year. Highlight those that are most relevant to your organisation:</p> | <p>This could include:</p> <ul style="list-style-type: none"> • non-client facing staff costs. • utilities. • costs of goods and services. • repairs and maintenance. • interest rates and rents if relevant. • travel including petrol. |
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Have you highlighted other factors that are influencing your costs?

These will be individual to your organisation but could include:

Projected or actual cost impact of changes to NDIA policy and/or NDIS Commission requirements that have occurred over the past 12 months.

Reasons for cost differentials between NDIS participants and other client groups. This is particularly relevant for therapy and early childhood providers.

Factors to consider:

- Level of staff experience and qualifications required.
- Average length of appointments.
- Delivering supports in natural settings as opposed to clinic/centre based including impact of travel time and costs. A survey found that 50 per cent of therapy services to NDIS participants were delivered in natural settings.
- Meeting NDIS Commission compliance obligations. The same survey found that approximately 8 per cent of allied health professional time was spent on non-billable compliance and related administration.
- Operating within the NDIS system compared to other systems such as Medicare with a short example/case study that illustrates these differences.
- Lower staff utilisation due to the above.

Writing your submission: Hints

There is no right or wrong way to format or write your submission. However the following hints might be helpful:

Start with a description of your organisation.

Include the question and/or question number from the consultation paper that you are answering. You do not need to answer every question in the consultation paper.

Consider using dot points or tables to illustrate key points. For example a side-by-side comparison of significant overhead costs.

For example: A table that compares Worker's Compensation Insurance and Insurance premiums for 2022-2023, YTD 2023-2024 and a projection for 2024-2025 could be an effective way of illustrating issues with overhead assumptions included in the pricing.

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| <p>If you have previously made other relevant submissions (whether to the Annual Pricing Review last year, or to the NDIS Review or other inquiries) summarise the key points that apply to the consultation questions and attach or link to the original submission.</p> | <ul style="list-style-type: none"> • For example: In our submission to the NDIS Review [linked/attached] we highlighted the following issues relevant to this Annual Pricing Review [dot points summarising issues]: • The impact of NDIS Commission compliance on registered providers. As registered provider X per cent of our staff time is spent meeting our obligations. • Insufficient allocation for training and support and supervision in the cost modelling undertaken by the NDIA. We highlighted that our staff is made up of new graduates/staff from diverse backgrounds, where English is not their first language/ work predominantly remotely. • Current pricing does not support delivery of early intervention supports in natural settings. Our experience is that families do not want to use their limited budget to pay for our staff to deliver early intervention supports in their home. |
| <p>Draw on existing sector wide data (most reports include an executive summary that provides an overview of the most important findings). Consider using this data and provide one or two examples of how this applies to your organisation. This approach could form the basis of a short submission focussing on your overall operating result and what this will mean for your organisation.</p> | <ul style="list-style-type: none"> • For example: Benchmarking data shows that more organisations are making a loss. Both Stewart Brown (55 per cent) and Ability Roundtable (63 per cent) benchmarking show that the majority of service providers in their surveys operated at a loss in 2022-2023. We are projecting an operating result of [X] for the 2023-2024 year. This is due to [could list factors such as staff wages, cost of insurance etc]. • This approach could form the basis of a short submission focussing on your overall operating result and what this will mean for your organisation. |
| <p>Consider how you think the situation could be improved and what recommendations you would like to make. NDS has developed a set of key messages that you may like to include in your recommendations. There may also be others that are specifically relevant to your organisation or the supports that your organisation provides that you would like to include.</p> | |