

2018/19 NDIS PRICE GUIDE QUESTIONS FOR THE NDIA

Version 1.00

Published: June 24, 2018

William Jamieson
william@supportability.com.au

Ph: 0412 715 735



1. PREFACE

SupportAbility is a client management system specifically designed to support Australian Disability Service Providers operating under the National Disability Insurance Scheme (NDIS). Over 100 Disability Service Providers across Australia currently use SupportAbility to manage their NDIS compliance and claims.

The 2018/19 NDIS Price Guide release by the National Disability Insurance Agency (NDIA) on June 21st, 2018 changes the way that service providers are expected to operate and claim under the NDIS in order to remain compliant. Unfortunately, the 2018/19 NDIS Price Guide, and supplementary letter 'Summary of updated price arrangements for 2018/19' lack the detailed information that NDIS service providers require in order to comply with many of the new requirements.

This document poses a number questions specifically designed to fill the gaps in these documents to provide a more complete understanding of how the NDIA expect providers to operate and claim. We humbly ask that the Agency assist us by providing answers to these questions so that we can solve these issues for a large number of NDIS service providers across Australia.



2. RULES FOR USING THE 2018/19 PRICE GUIDE PRICES

All Price Guides up to and including the 2016/17 Price Guide:

For all Price Guides preceding the 2017/18 Price Guide, providers were allowed to claim at the new price maximums from the commencement date of a new Price Guide, regardless of the prices itemised in existing service agreements.

2017/18 Price Guide:

This changed with the release of the 2017/18 NDIS Price Guide, when the NDIA have changed the rules in relation to pricing, stating that:

'Prices that have already been explicitly set in service agreements between providers and participants are not affected by changes to maximum prices, even if the service agreement is for the delivery of supports after 1 July 2017.' (page 12 of the 2017/18 NDIS Price Guide).

2018/19 Price Guide:

This clause was then removed again in the 2018/19 NDIS Price Guide and replaced with:

'Providers and participants can make service agreements under or at the 2018/19 price limits as long as the service is delivered on or after 1 July 2018.' (page 12 of the 2018/19 NDIS Price Guide).'

Furthermore, in the Summary of updated price arrangements for 2018/19, it is stated that:

'Participant Plans will be adjusted to match the indexation increases in price limits for disability supports, ensuring participants will maintain their purchasing power for reasonable and necessary supports. The specific impact on each participant's budget will vary, according to the mix of supports that are reasonable and necessary for each individual.'

- taken from the 'Summary of updated price arrangements for 2018/19'



QUESTION 2.1:

Given that the NDIA:

- have removed the clause 'Prices that have already been explicitly set in service agreements between providers and participants are not affected by changes to maximum prices.' (page 12 of the 2017/18 NDIS Price Guide)., AND
- 2. are indexing clients existing NDIS support plan funding balances from July 1st, to account for these new price guide maximums:

Can we assume, that unlike 2017/18, all providers are now allowed to charge at the new 2018/19 Price Guide maximums from July 1st, regardless of any itemised support prices in their existing service agreements with clients?



3. SUPPORT ITEM MAPPINGS

In the new 2018/19 Price Guide, there were 87 new support items added and 23 support items removed.

Modified Supports

In some cases, a support item that was removed, appears to have been added again with a new reference number.

For example, the support item for a 'Standing Frame - Child Under 5':

2017/18 Price Guide:

'05_053603007_0103_1_2: standing frame- child under 5'

2018/19 Price Guide:

'05_053603010_0103_1_2: Standing Frame - Child Under 5'

QUESTION 3.1:

For clients that have the old 2017/18 version of this support (05_053603007_0103_1_2) on their plan as a stated support, will the Agency accept claims under the new 2018/19 support item (05_053603010_0103_1_2), or do they still need to claim under the old number?

Removed Supports:

23 support items were removed from the 2018/19 Price Guide. E.g. 01_900101023_0130_1_2: assistance dog - including guide dog.

QUESTION 3.2:

For clients that have a 2017/18 support item (e.g. 01_900101023_0130_1_2: assistance dog - including guide dog) on their plan as a stated support, and that support has been removed from the 2018/19 price guide, will the Agency accept claims for this support from July 1st onwards?



4. CANCELLATIONS AND "NO SHOWS"

In the new 2018/19 Price Guide, the rules around cancellations and "no shows" have been amended:

Personal care and community access supports:

'If a participant makes a short-notice cancellation, which is after 3pm the day before the service, the provider may charge up to 90% of the agreed price for the cancelled appointment. A fee may be charged against a participant plan up to 12 times per year for personal care and community access supports.' (page 19 of the 2018/19 NDIS Price Guide)

Therapy services:

'Where participants make short-notice cancellations for therapy services, the therapist can charge a cancellation fee up to 90% of the agreed price for the cancelled appointment. Within the period of any Service Booking between a provider and participant, the total of cancelled appointments charged by the provider must not exceed six hours.' (page 19 of the 2018/19 NDIS Price Guide)

QUESTION 4.1:

Where the Agency describes cancellations for 'personal care and community access supports', is this inclusive of <u>ALL</u> of the Support Items within the:

- 'Assistance with Daily Life (1.01)' Category, and
- 'Assistance with Social & Community Participation (1.04)' Category.

If not, a precise list of NDIS Support Items that this rule applies to is required.

QUESTION 4.2:

Where the Agency describes cancellations for 'therapy supports', does this include ALL of the Support Items within the 'Improved Daily Living Skills (3.15)' Category?

If not, a precise list of NDIS Support Items that this rule applies to is required.

QUESTION 4.3:

For 'personal care and community access supports', the 2018/19 Price Guide states that 'a fee may be charged against a participant plan up to 12 times per year' (page 19). For providers servicing clients with multi-year plans, does the cancellation allowance accrue if unused, or are providers simply allowed to charge up to 12 cancellations in any given 12 month period?



QUESTION 4.3:

Is the 12 times per year rule applicable to each Service Provider the client engages with, or a shared allowance across all Service Providers? If it is across all, how is this managed?

QUESTION 4.4:

For 'therapy supports', the 2018/19 Price Guide states 'Within the period of any Service Booking between a provider and participant, the total of cancelled appointments charged by the provider must not exceed six hours'.

Does this mean Providers could potentially create multiple shorter term Service Bookings to get around this? e.g. a new Service Booking each month, meaning that the cancellation and "no shows" specific to this period alone must not exceed six hours in total?

Is the limit of six hours in total related to the type of therapy?

We are trying to ascertain if this clause is correct or should it be 'per year' like the personal care and community access supports?

QUESTION 4.5:

In a group service scenario where there is one staff member and 4 clients and 1 of those 4 clients is a chargeable late cancellation or "no show", are the remaining participants still charged at the 1:4 ratio?

QUESTION 4.6:

In a group service scenario where there is one staff member and 4 participants and 1 of those 4 clients is a non-chargeable cancellation or "no show" because they didn't show up but the provider has already changed for 12 occurrences, are the remaining 3 participants now required to be charged at the 1:3 ratio?



5. NON-QUOTABLE SUPPORT ITEMS WITH NO PRICE

The new 2018/19 Price Guide contains 270 support items that are flagged as non-quotable but have no price limit set. Many similar supports also existed in the 2017/18 Price Guide. SupportAbility is currently overriding the quotable flag for these support items to make them quotable to allow providers to set a price when delivering these supports.

QUESTION 5.1:

Can further details please be provided on how providers are expected to use and set prices for these 270 supports that are non-quotable but have no price?

QUESTION 5.1:

Should providers be treating these supports as quotable?

6. INDEXATION OF PARTICIPANT PLANS

In the 'Summary of updated price arrangements for 2018/19', it is stated that:

'Participant Plans will be adjusted to match the indexation increases in price limits for disability supports, ensuring participants will maintain their purchasing power for reasonable and necessary supports. The specific impact on each participant's budget will vary, according to the mix of supports that are reasonable and necessary for each individual.' (page 12 of the 2018/19 NDIS Price Guide).

QUESTION 6.1:

Can further details please be provided on the mathematical formulas the NDIA with be using to apply this indexation increase to providers plans and service booking for the various categories and supports?

QUESTION 6.2:

What portion of the Plan and Service booking/s will be indexed?



7. MONTHLY STATEMENTS

On page 12 of the new 2018/19 Price Guide, it states:

'To help participants keep track of their Service Bookings and budget, a Monthly Payment Statement will be available on the NDIS participant portal. Payment Statements will be available to the participant (and/or their nominee) on the first business day of each month, containing a summary of the previous month's payments, available budget remaining, committed budget and spent budget.'

QUESTION 7.1:

Can a copy of this monthly statement template or an example statement containing sample data please be provided? Many thanks.

8. CONCLUSION

We appreciate that the release of a new Price Guide signifies a demanding time for the Agency. Our questions are designed to help us support over 100 NDIS service providers comply with the new 2018/19 Price Guide, without the need for the Agency to conduct separate conversations with these providers.

We sincerely appreciate your consideration in this matter would be most grateful for any assistance and guidance that you could provide.

Kind Regards

William Jamieson

CEO of SupportAbility