

BOARD OF DIRECTORS
Bi-Monthly Meeting
 Minutes

Meeting: Board of Directors **Date:** Thursday, 27 April 2023
Meeting No.: 2/2023 **Time:** 5.55pm
Chair: Edwin Vandenberg **Venue:** The Courthouse, Warragul

Members In Attendance:

Edwin Vandenberg	Board Director/Chair
Debra O'Keefe	Board Director/Secretary
Robyn George	Board Director/Treasurer
Bryan Leaf	Board Director
Leisa Harper	Board Director
Phil Drummond	Board Director

Apologies:

Marianne Fontaine	Board Director
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In Attendance:

Jenelle Henry	Chief Executive Officer
Lora Moulton	Executive Assistant/Minute Taker

Agenda No.	Subject
1.	<p>Acknowledgement</p> <p>I acknowledge the traditional custodians of the land we are meeting on today, the Gunnai Kurnai people, and pay my respects to their Elders, past present and emerging.</p>
2.	<p>Appointment Of Positions</p> <p>Time Keeper: Lora Moulton Minute Taker: Lora Moulton</p>

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Agenda No.	Subject
3.	Declaration Of Conflict Of Interest Nil
4.	Confirmation Of Previous Minutes Motion: That the minutes of the previous meeting, held on Thursday, 16 February 2023, be accepted. Moved: Leisa Harper Seconded: Debra O'Keefe
5.	Matters For Board Discussion & Decision <u>5.1 Action List</u> Appendix A pages 6 & 7 <u>5.2 Mission, Values & Philosophy</u> Graphics (static and animated) from Rhiannon. Reviewed by all Board members and Option 2 selected. <u>5.5 Sale of Trailer</u> Motion: Sell the trailer. Moved: Debra O'Keefe Seconded: Robyn George Action Edwin to look into comparable pricing.

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6.	<p>CEO Report</p> <p><u>6.1 Report</u></p> <p>Motion: That the CEO Report be accepted. Moved: Leisa Harper Seconded: Robyn George</p>
7.	<p>Financial Report</p> <p><u>7.1 Balance Sheet</u></p> <p><u>7.2 Profit & Loss</u></p> <p>Motion: That the Financial Report be accepted. Moved: Robyn George Seconded: Phil Drummond</p>
8.	<p>Other Business</p> <p><u>8.1 Planning</u></p> <p>Appendix B pages 8 & 9</p> <p>Photograph of whiteboard at conclusion of Planning meeting held on 23 March 2023, from Edwin.</p> <p>Discussion on how best to move forward with ideas in Appendix B. All agree on the need to unpack each of the options to explore what comes next.</p> <ul style="list-style-type: none"> • Accommodation <ul style="list-style-type: none"> ○ Multitude of options ○ Could incorporate holidays • Acquisition/merger <ul style="list-style-type: none"> ○ Noweyung, but there could be other options

BOARD OF DIRECTORS

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Minutes

Agenda No.	Subject
	<ul style="list-style-type: none"> • Holidays <ul style="list-style-type: none"> ○ Head away with Headway ○ Providing a service, rather than real estate • Allied health <ul style="list-style-type: none"> ○ Hiring/renting out rooms to providers • Employment <ul style="list-style-type: none"> ○ Pathways to employment ○ Services for skills and training ○ Business to provide employment • Day service <ul style="list-style-type: none"> ○ Care/respite for carers <p>Action Jenelle to provide Board members with pros and cons for accommodation options, in the next week.</p> <p>Action Each Board member to brainstorm and provide a short paragraph outlining what they think could happen, for each topic.</p> <p>Action Jenelle to provide the following information for each topic, as soon as she can, to assist with brainstorming from each member.</p> <ul style="list-style-type: none"> • Pricing • Structure • Registrations <p>Next Meeting Wednesday, 10 May 2023 4pm til 6pm Boardroom at the Morwell office</p> <p><u>8.2 Performance Assessment</u></p> <p>Board members agree to make a start on this and be ready for a short discussion on it at the above Planning meeting.</p>

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Agenda No.	Subject
	<p>8.3 <u>Correspondence from CEO Collaboration Group</u></p> <p>Appendix C pages 10 & 11</p> <p>Letter to Bill Shorten</p> <p>Appendix D pages 12 to 20</p> <p>NDIS Annual Price Review</p> <p>Both were read aloud by Edwin.</p>
9.	<p>Board Correspondence</p> <p>Art Exhibition at Wonthaggi Library, on 31 March 2023. Was attended by Deb.</p>
10.	<p>Next Board Meeting</p> <p>Date: Thursday, 15 June 2023</p> <p>Time: 5.30pm</p> <p>Venue: The Courthouse, Warragul</p>

Meeting Closed	
Date:	Thursday, 27 April 2023
Time:	7.29pm
Chair:	Edwin Vandenberg
Signature:
Date signed:

Minutes Date	Topic	Agenda Item Number	Due	Who	Action Item	Comments	Status	Status Date
16-Feb-23	Members	5.1	next meeting	Edwin & Jenelle	Peter Clement to be presented with gift voucher to thank for years on the Board		Ongoing	27-Apr-23
16-Feb-23	Board Roles	5.2	next meeting	Edwin	Edwin to contact Robyn regarding requirements of Treasurer role		Ongoing	27-Apr-23
16-Feb-23	Director ID	5.4	next meeting	Lora	Follow up completion of Director ID with Bryan, Leisa and Robyn	5-Mar-23 - received from Leisa (LM) Has been on hold while Jenelle investigated whether or not this was a requirement. Board have decided that although it appears not to be a requirement, it is best practice. 28-Apr-23 - followed by email with Bryan and Robyn (LM)	Ongoing	27-Apr-23
27-Apr-23	Planning	8.1	05-May-23	Jenelle	Provide Board members with pros and cons for accommodation options.		Ongoing	27-Apr-23
27-Apr-23	Planning	8.1	10-May-23	All Board Members	Each Board member to brainstorm and provide a short paragraph outlining what they think could happen, for each topic.		Ongoing	27-Apr-23

Minutes Date	Topic	Agenda Item Number	Due	Who	Action Item	Comments	Status	Status Date
27-Apr-23	Planning	8.1	05-May-23	Jenelle	Jenelle to provide the following information for each topic, as soon as she can, to assist with brainstorming from each member. •Pricing •Structure •Registrations		Ongoing	27-Apr-23
27-Apr-23	Sale of tailer	5.5		Edwin	Edwin to look into comparable pricing.		Ongoing	27-Apr-23

Nothing in the NDIS space. 1

ACCOMODATION 6

ACQUISITION/MERGER 4

Holidays 4

ALLIED HEALTH/therapy OT/Speech/NDIS 4

Employment for those with disability niche 3

Support for training to support employment pathways

Employment 3

Day Service 2
Offer more services for clients & carers, i.e. day services

partnerships 7

GROUP SUPP YOUTH ENGAGEMENT 2

EQUINE THERAPY SERVICE ANIMALS 2

SHORT TERM ACCOMODATION 1

EQUINE
Therapy
VICE
MAIS 2

Partnerships
2

Holidays
4

ALLIED
HEALTH / para
OT / Speech / Nurs
4

ACQUISITION/
MERGER
4

ACCOMODATION
b

SHORT TERM
ACCOMODATION
1

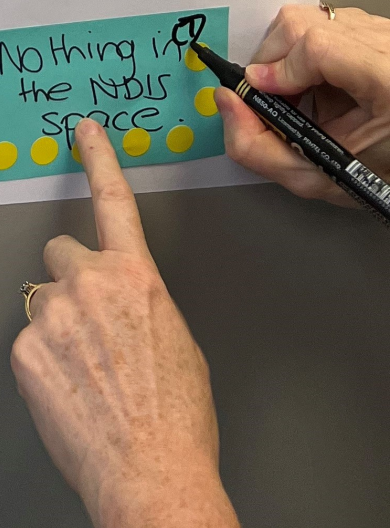
Employment³
for those with
disability niche
Support for
training to
support employment
Pathways

Employment
3

GRO
SUP
YOUTH
ENGAGEMENT
2

Day Service
2
Offer more services
for clients & carers,
i.e. day services

Nothing in
the NDIS
space.



The Hon Bill Shorten MP
Member for Maribyrnong
Minister for the National Disability Insurance Scheme
Minister for Government Services
PO Box 6022
House of Representatives
Parliament House
Canberra ACT 2600

Bill.Shorten.MP@aph.gov.au

20 April 2023

Dear Minister,

We, the undersigned, write to you to reaffirm our ongoing commitment to seeing meaningful quality and safety reform in the NDIS, by expanding registration requirements to ensure all providers of support work services are properly regulated.

As 38 registered providers operating primarily in Victoria, we know the benefits that registration brings to our business. We know it makes us better, and we know it is one important part of how we keep our community safe and keep ourselves accountable.

As you know, this is a view held by fewer and fewer providers. In fact, the latest Quarterly Report to Ministers revealed that in the plan managed space, fewer than ten percent of providers are registered – a trend that is moving backwards each quarter. This is unsurprising given the substantial gap in operational costs for registered and unregistered providers, paired with the declining commercial incentive of registration alongside shrinking numbers of agency-managed participants. This creates a two-tiered market with unsustainable competitive advantages for unregistered providers, which is leading to the risk of registered providers collapsing.

We know and value the principle of choice and control for all participants. We do not think it is unreasonable for choice and control to operate within the bounds of a strong, safe and regulated market. While we appreciate the Code of Conduct and what it aims to achieve, the reality is that (unlike registration audits) there is no proactive monitoring, nor reporting requirements, nor worker screening. Breaches of the Code rely entirely upon participants or their advocates firstly knowing the rules, being able to identify breaches, and having the capacity, time and confidence to make a complaint.

This is no way to run a multi-billion-dollar scheme. It puts participants in the invidious position of being both the consumer and regulator of their own support services. We believe that this quality and safeguarding burden must be taken off the participant exclusively and shared with the provider. To facilitate a simpler transition, we support a reimagined registration scheme, stripping out elements that have become onerous compliance requirements with little clear value to participants, and tiered to ensure small and sole trader providers are not subject to the same requirements as large ones.

We call on the government to reform how the NDIS is regulated and ensure all providers who deliver support directly to participants are subject to some degree of regulatory oversight, standards of practice and reporting requirements.

We welcome the opportunity to discuss this with you or your office further. Please contact Ms Lynette McKeown, CEO, Able Australia and Chair of the CEO Collaboration at lynette.mckeown@ableaustralia.org.au, to arrange a meeting.

Yours sincerely, on behalf of:

[Redacted signature block]

[Redacted signature block]

NDIS Annual Price Review (“APR”)

The CEO Collaboration Group (“CEO Co-lab”) is a group of 108 registered organisations that aims to create a forum to stay abreast of latest sector developments, share and inform best practice, benchmark practice and shape sector developments and improvements.

As part of the APR data collection, members of the CEO Co-lab contributed to the Ability First and NDS financial benchmarking exercises. As such, we do not propose to duplicate this effort. We undertake to provide a collective Provider perspective.

The CEO Co-lab organisations have undertaken a Survey, declaring their Projected Year End (FY23) forecast. While it is too early to report the full results, the early indication is that only 31% are on track to deliver a profit and 49% expect to deliver a deficit. This is beyond deficits predicted in the NDS State of the Sector report (40% predicted a deficit in Vic and Tas / 36% across all states and territories) and speaks to the fragility of the sector and the increased costs of delivering services.

Providers are experiencing escalating costs in FY22-23, due to inflation, COVID and an increasing regulatory environment, setting a challenging year which will continue into FY23-24.

General

There are many factors that continue to drive up expenditure across all NDIS funded items.

Over the twelve months to the December 2022 quarter, CPI rose 7.8%, the highest since 1990ⁱ. Significant price rises were seen in accommodation (+13.3%), household products (12%), housing (10.7%), electricity (+8.6%), rent increase across capital cities (av. 6.2%), and insurance (5%). All of these significantly increase the cost for NDIS Providers.

The further reduction of the Temporary Transformation Payment (“TTP”) in the current climate, with increasing costs, will be felt significantly across the sector.

The impacts of COVID, inflation, Quality and Safeguarding regulation and SCHADS Award changes are strong justification for the continuation of the 2% temporary loading, and TTP. Further evidence is provided in the body of the report, to support this.

COVID continues to have a lasting impact, increasing costs. The wider economic impacts are outlined above with increasing CPI. While there is a move to Business as Usual (“BAU”) and reducing costs, COVID costs continue to be prominent for organisations. Prevention and management processes, training, supply of PPE, high staff turnover (20% permanent, 28% - 38% casualsⁱⁱ) and staff sickness / isolation all result in increased use of overtime and a casualised workforce.

- Across the sector, 37% of the workforce is casualised, an increase of 6% since Dec 2020ⁱⁱ. This is despite FWC regulation requiring a movement to permanency for casuals. Many organisations experienced an increase in casual workers, during and following COVID.
- Many providers saw an increase in overtime and use of agency staff due to staff sickness and workforce shortages. Once again, this increases the financial burden for Providers.
- Providers also report experiencing a significant increase in recruitment costs due to staff shortages and turnover.

Registered Providers are experiencing increased expenses related to **compliance and regulation**. In FY23, the Royal Commission and NDIS Commission strengthened the ever-important **quality and safety** agenda through, but not limited to:

- *'Own Motion Inquiry into aspects of supported accommodation'* with 8 actions including new practice standards and compliance with Disability Capability Framework.
- New practices standards:
 - o Mealtime management - 4 weeks' notice to implement.
 - o Emergency and Disaster management – 8 weeks' notice to implement.
 - o Severe Dysphagia – was effective immediately.
- Revised High intensity skill descriptors – approx. 4 weeks to implement.
- Reportable incident investigations and subsequent stand down costs remain high for providers (> \$200K Able Australia YTD). More in-depth reviews, with terms of reference set by the NDIS Commission, can cost providers \$50K to >\$100k per review. Audit costs are escalating and inefficient with multiple accreditation audits across sectors.
- Compliance requirements and maintaining registration: Biala Peninsula estimate the annualised cost of audit (which includes approved auditor cost, staff training and staff availability during audit) is \$26K per annum. We have seen an increase in compliance costs over the past 12 months with the transition to the new Child Safe Standards, increase in Child Safe notifications as well as the requirement to provide annual training to staff on privacy, incident reporting and complaints.
- Significant costs are incurred to have suitably trained Quality staff.
- NDIS Commission 'Requests for Information' that need responses within limited timeframes - recent Behaviour Support / Restrictive Practices.
- Royal Commission with a vast expanse of recommendations for providers to navigate and respond to. Note the Royal Commission is yet to deliver its final report.

Meeting the NDIS Quality and Safeguarding Commission requirements is a **costly exercise for Registered Providers** and is not recognised in the current NDIS Prices. There also appears to be no connection between new regulation and funding for managing these improvements.

In addition, **other significant regulatory** changes include Social, Community, Home Care and Disability Services Industry Award ("SCHADS") changes, FWC Secure Jobs Better Future.

We welcomed the EOFY22 *'Deed of agreement regarding additional costs'*, 3.7% paid to registered providers in recognition of the additional costs relating to COVID, Quality & Safeguarding requirements and SCHADS. We also welcome the temporary 2% uplift applied in FY23 in recognition of the substantial COVID and Q&SG costs. We would like to see a permanent pricing solution recognising the significant cost to Register Providers to comply with the Quality and Safeguarding agenda.

Changes to **NDIS administrative and compliance requirements** continues to be driven through Provider engagement and activities, contributing to corporate overheads:

- Annual price reviews.
- Increasing complexity related to de-bundling of prices (group & centre-based activities into non-face to face, face-to-face and facility cost). In a recent survey of 35 organisations in the

CEO Co-lab, 60% are yet to move to the new pricing model. We welcome the move to simplify SIL with the introduction of weekly claims.

- Implementation of PACE portal.
- NDIS Review with the final report due October 2023 and subsequent activities.

We welcome the NDIS statement provided in the APR March 2023, to '*examine options to simplify... the NDIS price ... to better support participants ... regulatory burden...on participants and providers*'.

FY23 has seen many Providers review their business models, to deliver **efficiencies** across all categories of expenditure including corporate overheads. Many Providers have or are planning to reduce back-of-house costs, cease services, and undertake acquisition and merger activities to drive down corporate overheads. The CEO Co-lab continue to work collectively to drive efficiencies and better outcomes:

- **Insurance Premiums** have increased by 5% according to ABS. Workers Compensation premiums are increasing and reportedly underfunded in the NDIS price cost models.
The CEO Co-lab worked collectively to purchase insurance. With increased buying power, we achieved more cost effective and comprehensive insurance cover, through Jobs Australia.
- The CEO Co-lab have partnered with Deloitte to undertake a feasibility study into **shared ICT platforms and service models**. The aim is to reduce corporate overheads while increasing customer service and regulatory compliance in an increasingly complex regulatory environment. Deloitte's Foundation are providing a substantial grant to facilitate this.

Employee Expenditure

In the December quarter 2022, the seasonally adjusted **Wage Price Index** rose 0.8% for the quarter and **3.3% over the yearⁱⁱⁱ**, tracking towards a 10-year high.

We advocate for NDIS funding to be aligned to any **FWC decisions / WPI applied to the SCHADS Award** for FY24. Also, disability providers should not be disadvantaged by minimum wage price rise, which is proposed to be 15%, in the aged care sector. **Providers should not be left to fund any shortfall, given already slim/negative margins**. We note that many EBAs provide wage uplifts in excess of these amounts, providing mounting pressure on Providers in the current economic climate.

We request the full increase in the **superannuation guarantee** charge be funded.

COVID continues to impact providers with unprecedented **staff turnover**, reported between **28-38%** for casual staff^{iv}. This greatly increases recruitment, on-boarding and training expenses. Training requirements for DSW staff working for registered providers is substantial. This, combined with turnover rates, continues to be an ever-increasing costly exercise for Providers.

Supports delivered by DSWs

In summary, there is overwhelming feedback from the CEO Co-lab members that the assumptions for a Disability Support Worker according to the price model is too low.

- **Training for staff** - to meet regulatory training requirements, Able Australia provides 40 hours of on boarding and mandatory training per staff member, in addition to three buddy shifts. This equates to considerable unfunded hours in the DSW pricing model and is just

one example of DSW training across providers. This expense is greatly increased by COVID and further influenced by staff turnover and casualised workforce.

- **Intake and assessment** - the time to assess a client, develop an individualised plan and service model and negotiate a package for a client is under funded by the agency. In very complex client cases, this process takes time and requires financial investment. We estimate that assessment and preparation of a NDIS package in terms of staff time, costs in excess of \$500 that can be claimed if the person commences services. ERMHA report this is common for all exceptionally complex referrals it accepts with assessment requiring meetings with key stakeholders (such as The Police and emergency services, other service providers, the Guardian, hospital staff and other treating practitioners) as well as reviewing all documentation and reports to formulate an assessment of risk and need before a plan can be fully developed and costed for the agency.
- **The costs of quality and safeguards** - the costs associated with managing incidents, staff training, debriefing, etc are not covered in the unit cost. In addition, resources needed to support operations managing very complex and / or high-risk participants is also not included in the unit cost. This includes attending numerous / frequent care team meetings, additional reporting requirements, follow up with key stakeholders, community engagement, etc.
- We have seen numerous cases where the level of funding allocated for very high-risk clients transitioning to the NDIS has greatly reduced to a point where service provision is unsafe and unviable. It is unclear why packages proposed by qualified professionals have not been adequately funded. Reviews take significant time, and providers run the risk of over servicing a client if a review is not accepted. This can run into the tens of thousands of dollars, not being sustainable. Where a package is unviable from a quality and safety perspective, Providers have to consider ceasing service provision.
- **Increasing requirement for SIL Providers to take on Case Manager like-role** - this is a position unavoidable under the NDIS Commission rules and practice standards that Providers are forced to fund and hold in order to meet NDIS funding requirements. Case Management is defined as *'to assist clients ... to attain their identified goals. Key phases within the case management process include: client identification (screening), assessment, stratifying risk, planning, implementation (care coordination), monitoring, transitioning and evaluation. Within the case management process the Case Manager navigates each phase of the case management process (as applicable) with careful consideration of the client's individual, diverse and special needs, including aspirations, choices, expectations, motivations, preferences and values, and available resources, services and supports''*.
- The implementation of two hours minimum shifts under SCHADs award, has resulted in shifts of lesser length not being fully funded under the NDIS Price model. Providers are left to fund the shortfall or Participants are not able to obtain services under two hours. The minimum shift length also impacts training whereby Providers need to ensure they batch training into two hours packages.

Therapy Supports

CPI currently sits at 7.8%, the highest in over 30 years, and therapy has not been in receipt of prior year NDIS price increases since 2019.

- **Increase cost to deliver Therapy supports:** Costs have significantly increased since the last price increase in 2019 (for Biala this has been 32%). Not only award / CPI and superannuation increases, but also market increases given the high demand for services (we

currently have as many clients on our waitlist as we have receiving supports) and low availability of Therapists (Occupational Therapy and Speech Pathology). Year-on-year since 2019, we have seen the biggest increase in the last 12 months. This has been due to:

- CPI increases of 4.6%;
 - reimbursement for travel increasing 15% (HPSS award);
 - 0.5% superannuation increase;
 - Ongoing impact of COVID on both workforce and clients without government support;
 - Salary expectation of Therapists is also driving up market cost:
 - Through our interviews we have seen a \$10K increase in the expectations of graduates over the past 12 months;
 - Opportunity for Therapists to operate as unregistered providers / independent contractors is also pushing up salary expectations;
 - Competition from other sectors such as Aged Care.
- Vic public health therapists are receiving a 2% year-on-year rise over the next three years. This is on top of prior year up-lifts. This may increase competition.
- Therapy pricing does not recognise the specialist skills and supervision requirements. Supervision is a mandatory requirement set by AHPRA and other professional bodies. This is a vital part of attraction and retention to the NDIS sector.
- The NDIS Commission recognise the need for workforce supervision and training, emphasising this theme in many recent publications:
 - 2023 NDIS Commission Behaviour Support Audit. Note many Behaviour Support Practitioners are Therapists;
 - There is also the application of skills matrix for high intensity; and
 - The Own Motion-supported accommodation resulted in an action to use the DSW Capability Framework across the sector.
- Therapy is a lean and constrained market. Availability to therapy favours middle to higher socio-economic persons able to afford assessments. This translates to receipt of reasonable and necessary NDIS plans. There is a need to rapidly resolve the supply and demand issues.
- A whole of government response is required to acquire and grow a sustainable therapy workforce to meet current future needs.
- We support more innovative rural and remote pricing models to secure resources in lean markets. The CEO Co-lab would be happy to consult on this.
- **The industry is seeing an increased presentation of families with multiple and complex needs.** This is particularly prevalent with the impact of COVID and financial pressures families are facing, with increases to cost of living and interest rates. At Biala, 69% of clients would be classified as complex, which requires a high level of responding to client crisis and disclosures (especially where disclosures come from a child). Many of these activities are not billable such as liaison with support co-ordinators, assisting with referrals to support family members (i.e. siblings) who are not on NDIS, responding to inquiries from other services involved with families, involvement in subpoenas and court cases or child protection referrals, attendance at case conferences/care team meetings/NDIS correspondence and meeting mandatory reporting requirements.

- Provision of supports in the child's natural setting vs medical model of care in a clinic-based setting: Biala is currently supporting 366 children and their families with a further 376 clients waitlisting for support. Given the age range of our clients, the therapy supports delivered by Biala Peninsula are predominantly delivered in the child's natural environment such as the home, Early Learning Centre or School. This aligns with the Early Childhood Support Module that each participant accesses supports that engage their natural environments and enable inclusive and meaningful participation in their family and community life. Of the 366 children we are currently supporting 23% are supported in Early Learning Centres and 71% are supported in schools. Whilst the provision of supports in the child's natural setting is consistent with evidenced based best practice (e.g., Early Childhood Intervention Australia's national guidelines best practice in early childhood intervention) it is a much more inefficient way of delivering supports comparative to a more medical model of care in a clinic-based setting.
- What has been the main cost driver in delivering NDIS therapy supports over the past year? Is this different to the past few years? Abacus Learning reports an increased cost of wages from CPI on SCHADS award plus increase in superannuation, with no increase in price limits for 1:1 therapy in early intervention, which is the main cost driver. There has been no price increase for two years, yet the cost of running the service continues to increase. The second impact is the administrative cost of advocating for families to obtain appropriate NDIS funding to access the service. Many of our families have English as their second language and the work to obtain enough funding to attend our service 12 hrs per week on 1:1 basis for their autistic child is extreme. The resulting funding reviews and delays have led to high stress for the families who have to either pay out their own pocket whilst waiting for plans to be updated or reduce days of service or pull them out completely whilst waiting. This is happening to 10% of our families and we are spending a lot more time on assistance.

**Submission on behalf of CEO Collaboration Group
13th April 2023**

ⁱ <https://www.abs.gov.au/statistics/economy/price-indexes-and-inflation/consumer-price-index-australia/latest-release>

ⁱⁱ [SoTDS_2022.pdf \(nds.org.au\)](#)

ⁱⁱⁱ <https://www.abs.gov.au/statistics/economy/price-indexes-and-inflation/wage-price-index-australia/latest-release>

^{iv} <https://empathiagroup.com.au/a-deep-dive-into-ndis-staff-turnover-data/>

^v <https://www.cmsa.org.au/about-us/what-is-a-case-manager>

Participating Organisations
CEO Collaboration Group

	Organisation
1	[Redacted]
2	[Redacted]
3	[Redacted]
4	[Redacted]
5	[Redacted]
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