

Ethical Billing of support hours in the NDIS

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Billable time spent delivering services in the NDIS is stipulated in the Pricing Arrangements and Price Limits (<https://www.ndis.gov.au/providers/pricing-arrangements>) and providers who claim under Improved Relationships are subject to the highest level of audit in the NDIS. [What is billable support time?](#) sets out what is billable by behaviour support practitioners.

1.0 What is billable support time?

Funding for NDIS supports can be claimed by NDIS providers according to the NDIS Pricing Arrangements and Price Limits. For Behaviour Support, the price limits and what is billable is set by the NDIS to provide the funding necessary for the development of Behaviour Support Plans and associated training of implementers. It is important for Insight PBS that participant funding is used ethically. Ethical billing comprises ethical billing towards the participant and the NDIA (not billing for more time than you spend), but also ethical billing towards Insight PBS (not billing for less time than you spend). There are a number of negative downstream effects associated with “under-billing” - detailed here - [Ethical billing of support hours in the NDIS](#)

2.0 Why claim your time?

If you are working on a client's file, you are either: planning, engaging, developing, or performing another task related to developing a behaviour support plan or associated training of implementers. Whilst this is all support time that is billable within the rules set out by the NDIS, sometimes practitioners can feel a sense of guilt towards claiming those support hours, in an attempt to stretch the client's funding, or through a subjective sense of thinking their time is not valuable.

There are several issues that are associated with this approach which are detailed below:

- Accurate record keeping is one of our core requirements.
- If 30 hours of work are delivered, and only 20 hours are billed, it sets incorrect assumptions in the industry about what can be achieved in a certain amount of time. We have seen plan renewals heavily impacted for this reason (it has led to participants being underfunded across all therapy budgets).
- For a practitioner to meet their daily support hour target, it may mean they need to work for 10+ hours, which is against Insight PBS and the NDIS goals of creating a sustainable workforce as this practice leads to burnout. It is encouraged that any practitioner working more than 8 hours a day to meet the five (5) support hour target should talk to their team leader about case planning, their capacity, and time management.
- If a practitioner doesn't accurately claim for their time, it might appear that they are not providing appropriate support to clients.
- Billing five (5) support hours a day is part of the responsibilities of a behaviour support practitioner at Insight PBS, to ensure that Insight PBS is financially viable. If you need any assistance with structuring your day, please visit [Ideas on structure for the day](#)
- In the hybrid working environment, there is a lot of trust between Insight PBS and our employees. Support hours billed is the only objective measure of the output which you have done. For any staff not currently meeting their target, it is assumed that this is due to the “under-billing” issue. However, after this communication, it is expected that under billing will cease.
- Insight PBS is an inclusive employer that has employed practitioners with diverse skills, experiences, and disabilities. Practitioners claiming for the time they spend on billable activities is the only fair way for a behaviour support

practitioner's time to be valued. We all have different experience, skills, and life experiences - even thinking styles and typing speed, but we are inherently all equal, and support time should be treated the same way. If any practitioner is concerned that they are taking more time than is reasonable, its best to talk to your team leader.

3.0 Support hours billable (associated with delivering Positive Behaviour Support)

- Reviewing documents that are sent to you (e.g. reports, assessments, plans, email)
- Making/ receiving calls that will assist in understanding behaviour, situation, or to assist in developing a plan
- Writing emails about the support of participants to stakeholders
- Research about diagnosis/comorbidities/strategies/medication/ Restrictive Practices that will contribute to the development of the behaviour support plan
- Writing/Developing information and key details into the Behaviour Support Plan
- Your Team Leader/ Clinical Manager will assist in the development of the behaviour support plan.
- Appointments, Care Team Meetings (CTM) & cancellations (if cancelled within 24 hours and you cannot find other tasks to complete during that appointment time)
- Travel time, up to 30 minutes each way.
- Report writing
- Case noting - click here for [Case Notes](#). Case notes should approximately take half of the time the activity you are writing the case notes about lasted. For example. if you had a half an hour call, the estimated time spent in case notes (if not done during the phone call) would be 15 minutes. Writing case notes is a key skill that can also mean that future time spent on the client is done effectively and efficiently, as it helps synthesise information and enables you to develop a well thought out plan moving forward.
- Developing material/ resources for stakeholder training
- Delivering training
- Further [Guidance on funding](#)
- For any assistance with structuring your day, see [Time Management Strategy](#).

4.0 Insight PBS approach to Ethical Billing

- Insight PBS, without being required to, have a graduated approach to practitioners achieving their five (5) support hours billed per day. This is so that during the first 6-8 weeks, practitioners can focus on becoming confident with their approach.
- Insight PBS has developed a range of strategies that stretch the participants funding, including the use of online forms. This is an example that may save up to 4-6 hours of support time for the participant. If the participant or their support network has the capability to complete the online forms, you are able to generate a lot of information whilst not impacting heavily on their funding. *Other providers may do paper-based assessment, meaning that to do a WHODAS or AQOL, they may bill up to 60 minutes, then a 60 minute visit, then another 30 minutes on the scoring and interpretation of the assessment. Whilst that is all still claimable, there are more value for money options available, such as what we are doing.*
- Insight PBS are continually looking for new ways to provide more value to participants.
- Practitioners will be encouraged over time to ensure they are not shouldering the responsibility of generating more value for the participant - this is the responsibility of the senior leadership team at Insight PBS. The processes have been designed to deliver value, so when a practitioner follows the process and spends time on billable tasks, it is expected this time is billed.
- **If you log time against a file that you would normally feel guilty about, ask your team leader to review it before the end of the week. If there are any issues with it, we can amend it before the funding is claimed from the client.**

5.0 Conclusion

Insight PBS condemns unethical practices in the NDIS and that extends to fraudulent claims.

Insight PBS would never ask any practitioner to claim for any support not provided.

Insight PBS requires practitioners to claim for support that has been provided.

Insight PBS believes in work-life balance - The expectation is that five (5) support hours are claimed within the 8 hour day.

If you are having trouble with any of the above, it is best for you to take a proactive approach and raise this with your team leader