Service Delivery in CRS Australia

Department of Human Services

Australian National
Audit Office

Canberra ACT
14 April 2011

Dear Mr President
Dear Mr Speaker

The Australian National Audit Office has undertaken an independent performance audit in the Department Human Services in accordance with the authority contained in the *Auditor-General Act 1997*. Pursuant to *Senate Standing Order 166* relating to the presentation of documents when the Senate is not sitting, I present the report of this audit and the accompanying brochure to the Parliament. The report is titled *Service Delivery in CRS Australia.*

Following its presentation and receipt, the report will be placed on the Australian National Audit Office's Homepage—http://www.anao.gov.au.

Yours sincerely

Steve Chapman
Acting Auditor-General

The Honourable the President of the Senate
The Honourable the Speaker of the House of Representatives
Parliament House
Canberra ACT

AUDITING FOR AUSTRALIA

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Glossary and Abbreviations

Certification bodies	Firms accredited by JAS-ANZ to grant certification to disability employment services providers and monitor their ongoing compliance with the Disability Services Standards. Also known as accreditation auditors.
CRRS	Complaints Resolution and Referral Service, which is an external complaints resolution service for people using Australian Government-funded disability employment and advocacy services.
DEEWR	Department of Education, Employment and Workplace Relations
DHS	Department of Human Services
Disability Management Services	For job seekers with a disability, injury or health condition who require the assistance of a disability employment service but are not expected to need ongoing support in the workplace. Prior to 1 March 2010, this service was called Vocational Rehabilitation Services.
Disability Services Standards	The standards under the *Disability Services Act 1986* (Cth), and the relevant key performance indicators, as determined by the Minister.
EPP	Employment Pathway Plan, which is the Department of Education, Employment and Workplace Relations' (DEEWR) specified form to capture client's activities and goals to obtain employment. It is retained in the Employment Services System and a printout is signed by clients and retained in their case file.
FaHCSIA	Department of Families, Housing, Community Services and Indigenous Affairs

JAS-ANZ	Joint Accreditation System of Australia and New Zealand, which is the government-appointed accreditation body for Australia and New Zealand responsible for providing accreditation of certification bodies in the fields of certification and inspection.
Job Capacity Assessment (JCA)	A comprehensive work capacity assessment that combines referral to employment and related support services with the assessment of work capacity for income support purposes. A Job Capacity Assessment is required when a person:

- claims a Disability Support Pension (DSP), or when their existing DSP is being reviewed;

- with identified barriers to employment claims or receives Centrelink income support payments; and

- is a parent or mature aged person seeking an employment and income support payment.

Job Capacity Assessor	An assessor who refers people with disabilities and other barriers to work to appropriate employment and support services, and their reports are used for Centrelink decisions about capacity to work. Assessments are conducted by allied health professionals, such as registered psychologists and rehabilitation counsellors, employed by Job Capacity Assessment service providers, including CRS Australia, which are contracted by DEEWR.
Vocational rehabilitation	A service provided to a person with a temporary or permanent disability or injury to assist them in maintaining or obtaining employment, including training, skill development and health related services to assist in managing their condition while working.

Summary and Recommendations

Summary

Introduction

1. CRS Australia began operating in 1941[1] and provides vocational rehabilitation and employment-related services to the Australian Government and the private sector. CRS Australia is a division of the Department of Human Services (DHS), a *Financial Management and Accountability Act 1997* (FMA Act) agency. Although part of an FMA Act agency, CRS Australia does not receive direct Budget funding; instead, it funds its operations through the payments received for services delivered.

2. In 2009–10, CRS Australia had a workforce of over 2000 staff who provided vocational rehabilitation and employment-related services to some 57 000 clients from 185 sites and 140 visiting (outreach) services around Australia. From the delivery of these services, CRS Australia earned $197 million in revenue, of which $154 million was received from its service delivery arrangements with the Department of Education, Employment and Workplace Relations (DEEWR) for Disability Management Services within the Disability Employment Services program.[2]

Disability Employment Services

3. The Australian Government's social inclusion agenda aims to make sure every Australian has the 'capability, opportunity and resources to participate in the economy and their community while taking responsibility for shaping their own lives.'[3] Disability employment services providers assist people with disabilities to improve their opportunities for employment so they can achieve greater social inclusion, usually through gaining employment in the 'open' labour market with remuneration at standard award rates.

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[1] In 1941, the Vocational Training Scheme for Invalid Pensioners commenced. In 1948, it became the Commonwealth Rehabilitation Service and underwent a name change to CRS Australia in 1998.

[2] In 2009–10, the program funding was received from Vocational Rehabilitation Services until 28 February 2010 and, with the introduction of the new program, from Disability Management Services from 1 March 2010.

[3] Australian Government, Department of the Prime Minister and Cabinet, *A Stronger, Fairer Australia—A National Statement on Social Inclusion*, PM&C Canberra, 2009, p.iii.

4. The Disability Employment Services program[4] has two streams: Disability Management Services[5] and Employment Support Services[6]. Disability Management Services assist job seekers with a disability, injury or health condition who require the assistance of a disability employment service but are not expected to need ongoing support in the workplace. Employment Support Services assist job seekers with a permanent disability who have an assessed need for more long-term, regular support in the workplace.

Disability Management Services provider arrangements

5. The Disability Management Services Program is managed by DEEWR under contractual or like arrangements. CRS Australia is one of 66 providers of such services. As CRS Australia is part of the Australian Government, it has a Memorandum of Understanding (MOU) with DEEWR for the provision of Disability Management Services. In essence, the MOU is the same as the contract with private sector providers.

6. Through the contract (or MOU), DEEWR sets out the services to be provided, the eligibility for the services, the manner in which they are to be provided and the fees it will pay. To provide incentives for the desired policy outcomes, DEEWR has developed a fee schedule that rewards the achievement of employment milestones in its contract arrangements.

7. The payment model is only one of the means DEEWR uses to influence service providers' behaviour and to monitor performance. In 2008, DEEWR implemented a system of star ratings for each service delivery site operated by a provider. These ratings provide for a comparative assessment of sites against peers operating in the same area.

8. The star ratings system is based on a scale of one to five, with a star rating of one indicating a comparatively lower performing site and a star rating of five indicating that the site is comparatively high performing. Following the new contractual arrangements for disability employment services providers introduced in March 2010, an updated star rating system

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[4] Temporary and permanent disabilities and health conditions encompassed by disability employment services include: physical, such as back injuries, muscle and joint problems; visual impairment; communication and hearing disorders; mental health, such as depression, anxiety, schizophrenia; and acquired brain injury.

[5] Prior to 1 March 2010 called Vocational Rehabilitation Services.

[6] Prior to 1 March 2010 called the Disability Employment Network.

has been developed, with the star ratings to be made public on a six-monthly basis from August 2011.

Legislation and standards

9.   The *Disability Services Act 1986 (Cth)* (the Act) was introduced to ensure people with disabilities were provided with services to a certain standard and to 'assist persons with disabilities to receive services necessary to enable them to work towards full participation as members of the community'[7]. The Act includes the Disability Services Standards, which outline 12 service quality standards that are supported by 26 key performance indicators.

10.   The Act specifies that a service provider must be independently assessed and certified against the Disability Services Standards in order to receive government funding.[8] The Quality Strategy for Disability Employment and Rehabilitation Services[9], introduced in 2002, provides guidance for all Disability Employment Services program providers on how to meet, as a minimum, the Disability Services Standards.

Accessing Disability Employment Services

11.   The most common way[10] that clients can access the Disability Employment Services program is through a referral via a Job Capacity Assessment (JCA).[11] Centrelink, on behalf of DEEWR, identifies that a job seeker requires an assessment of their work capacity and an evaluation of any barriers preventing them from gaining employment. The job seeker is sent for a JCA where the assessor uses medical and other information to make the assessment and may then refer the job seeker to a Disability Employment Services provider.

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[7]   *Disability Services Act 1986 (Cth)* s1B.

[8]   ibid., s5, s5A and s10.

[9]   Department of Families, Housing, Community Services and Indigenous Affairs, *Quality Strategy for Disability Employment and Rehabilitation Services*, FaHCSIA [Internet] Canberra, 2002, available from<http://www.fahcsia.gov.au/sa/disability/progserv/providers/Pages/QualityStrategyDisabilityEmploymentServices.aspx> [accessed 26 October 2010].

[10]   Clients can also access Disability Employment Services through the Job in Jeopardy scheme and direct referral (including eligible school leavers).

[11]   Job Capacity Assessments (JCAs) are a tool used to assess a job seeker's capacity for work and to identify areas where existing barriers to gaining employment can be overcome. A JCA also identifies the current and future work capacity, that is, the number of hours a job seeker has to work to reach their benchmark.

CRS Australia's services

12. Prior to 1 July 2007, CRS Australia was the sole service provider of Australian Government funded vocational rehabilitation services. Since that time, the Australian Government has progressively implemented a suite of reforms to the sector, including the introduction of private sector competition within the market. As a result, CRS Australia now has approximately 55 per cent of the market share for Disability Management Services.

13. To undertake vocational rehabilitation, CRS Australia assesses a client's medical issues and other barriers to employment, and prepares a plan to support them to maintain or obtain employment. A vocational rehabilitation plan (such as the Employment Pathway Plan) may contain interventions such as counselling, training, job preparation and allied health services.

14. CRS Australia also delivers other services, which include conducting JCAs on behalf of DEEWR and providing workplace assessments, injury prevention services and return to work programs for a range of private sector employers and insurers.

Audit objective, criteria and scope

15. The audit objective was to assess the effectiveness of CRS Australia's delivery of Disability Management Services. In assessing CRS Australia's performance, the ANAO examined whether:

- services are delivered in accordance with CRS Australia's operating procedures, which incorporate the Disability Services Standards and the requirements of the DEEWR MOU;

- CRS Australia has an effective client feedback (including complaints) system, which is used to identify and address business risks and areas for improving service delivery; and

- sound governance arrangements (including performance monitoring and reporting) are in place to monitor service delivery.

16. The audit did not specifically examine issues and information relating to the commercial nature of the business, such as profitability levels and competitive neutrality arrangements.

Overall conclusion

17. For some 70 years, CRS Australia has been providing vocational rehabilitation and employment-related services to help people with a disability, injury or health condition obtain and/or maintain sustainable employment. In recent years, the Australian Government has implemented a suite of reforms to the disability employment sector, including the introduction of competition. This has resulted in CRS Australia moving from being the sole provider of vocational rehabilitation services to being one of 66 providers of Disability Management Services, with approximately 55 per cent of the market share during the period 2010–12. The diminishing level of 'guaranteed' work and corresponding requirement to compete with a range of providers, has meant that CRS Australia has needed to be flexible in its operations while maintaining a high level of customer service that provides employment outcomes for clients.

18. As the major provider of Disability Management Services, CRS Australia's operational processes and service delivery model allow it to effectively deliver services in accordance with the Disability Services Standards and requirements of the DEEWR MOU. In doing this, CRS Australia has regularly met key service delivery milestones while also achieving an operating surplus. At the centre of CRS Australia's business is its quality management system. Through the quality management system, service standards are established, roles and responsibilities are articulated, guidance and training activities are made available to staff, and quality assurance processes that allow management to monitor service delivery are adopted. Complementing the internal quality management system are external quality assessments, including the annual independent accreditation audits, DEEWR compliance audits, and DEEWR's star ratings system.

19. As disability services providers are required to have an internal feedback system, including for complaints, CRS Australia has processes in place to obtain client feedback and to address client complaints. These include providing information to clients on internal and external complaint mechanisms, having available a range of methods to obtain feedback and adopting a tiered system for recording and responding to complaints. CRS Australia's internally conducted end of program client feedback surveys show a high level of client satisfaction with the services being provided. Over the period 1 July 2008 to 30 June 2010, 90 per cent of respondents indicated that they were satisfied or very satisfied with the support received from CRS Australia. An external survey conducted in 2007, which included DEEWR job

seekers, provided an overall satisfaction rating of 79.2, the high end of the moderate satisfaction scale.

20. Supporting the delivery of services, CRS Australia's planning and monitoring framework encompasses all levels of its operations with business plans and risk registers being maintained across the business. CRS Australia has a robust internal reporting framework, particularly performance reporting against the achievement of financial and service delivery targets. In 2009–10, CRS Australia reported placing 11 859 job seekers in employment, with 7527 clients remaining in employment for 13 weeks and 5851 clients remaining in employment for 26 weeks.[12]

21. Notwithstanding the effectiveness of CRS Australia's overall performance, there are areas where enhancements to existing practices could improve onsite quality assurance, client feedback processes, including complaints, and performance reporting.

22. At service delivery sites, senior rehabilitation consultants (SRCs) perform essential onsite quality assurance, particularly client case reviews. However, following organisational changes that included clarifying the role and responsibilities of SRCs, the varying workload demands, at times, limit the ability of SRCs to adequately perform the quality assurance role. This was evident through the observed variation in the methodology and process for completing case reviews and some case files containing no indication that a review had been conducted. Given the revised SRC role has now been in place for over 18 months, this provides an opportunity to undertake a post-implementation assessment of the changes to ensure the expected outcomes are being achieved. CRS Australia advised that it commenced a review in January 2011, which was completed in March 2011.

23. CRS Australia's internally conducted end of program client feedback surveys show a high level of client satisfaction. However, a low and decreasing survey return rate (12.5 per cent in 2009–10) limits the level of assurance that can be placed on the results from a business-wide perspective. CRS Australia could complement and improve the existing client feedback mechanisms by: seeking feedback from clients while they are receiving services; more regularly

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[12] Under the DEEWR MOU, the 13 week (durable) and 26 week (sustained) employment outcomes are classified as milestones. Note as the Disability Management programs run for up to 78 weeks, there are timing differences that affect the job placement results from year to year.

commissioning externally conducted surveys (that include DEEWR job seeker clients) to balance the potential non-response bias from internally conducted surveys; and implementing a dedicated client feedback (including complaints) form on the CRS Australia website to improve the ease with which clients can provide feedback.

24. While complaint numbers are relatively small (295 recorded complaints in 2009–10), there were indications that, at some sites, staff awareness of the complaints management system was low and/or some complaints were not being recorded in the database. CRS Australia encourages clients to address internal complaints to staff at local sites in the first instance. However, not all staff working at local sites, such as administrative staff, receive training on how to recognise, respond to and deal with a complaint. Therefore, broadening the scope of the existing complaints management training to all service delivery staff could assist with increasing awareness, and promote the recording of all complaints in the database. This in turn would provide management with greater information on clients' views on the services they have received.

25. External reporting is maintained through the DHS annual report. In recent years the key performance indicators used have changed, limiting the ability of stakeholders to form a view of performance over time. Using consistent indicators, which demonstrate performance outcomes (such as the proportion of clients achieving 13 week and 26 week employment outcomes), would give greater insight to CRS Australia's performance.

26. To assist CRS Australia to build on its business practices and engagement with clients, the ANAO has made three recommendations aimed at improving the capture and analysis of client feedback and complaints, and the level and consistency of public performance reporting.

Key findings

Service Delivery (Chapter 2)

27. To help deliver its services in accordance with the Disability Services Standards and the DEEWR MOU, CRS Australia has:

- defined staff roles and the required skills;

- produced and disseminated operational guidelines;

- provided training opportunities; and

- implemented an onsite quality assurance program.

28. CRS Australia employs a mix of allied health professionals[13], employment service specialists and administrative staff across its service delivery sites. Staff are broadly classified in one of five roles for which CRS Australia has defined the relevant responsibilities and necessary skills.

29. Through CRSnet, an Intranet-based repository of information and guidelines, CRS Australia provides extensive guidance on all aspects of service delivery and a reference library. These guidelines are designed to ensure that service delivery staff meet the minimum standards set out in the Disability Services Standards and comply with the requirements of the DEEWR MOU. In addition, CRS Australia provides induction training for all new staff with additional role specific training and commencement plans for service delivery staff.

30. To monitor and support service delivery within and across sites, CRS Australia has developed the senior rehabilitation consultant (SRC) role. Among other tasks, SRCs perform a quality assurance role, principally through client case file reviews[14], which are central to maintaining a consistent approach to service delivery. Some case files examined, however, did not indicate whether the required case reviews had been undertaken. CRS Australia has specifically designed the SRC role to allow for flexibility in the tasks undertaken. While this allows regions to tailor the working arrangements to suit the operational environment, it has meant that in some cases this impacts on the quality assurance role of the SRC.

31. The new SRC role has been in place for over 18 months. This provides a timely opportunity to review the changes and assess whether the expected outcomes of, and support for, the SRC role (particularly quality assurance), are being achieved. CRS Australia advised that it commenced a review in January 2011, which was completed in March 2011.

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[13] Allied health providers include health professionals with qualifications in occupational therapy, physiotherapy, psychology, rehabilitation, speech pathology and social work.

[14] A case review is where a client's progress, case notes and vocational rehabilitation plan are assessed.

Quality Management (Chapter 3)

Internal quality management

32.   CRS Australia has a quality management system designed to align with the Disability Services Standards and the Quality Strategy for Disability Employment and Rehabilitation Services, and also to meet the requirements of the DEEWR MOU.

33.   A key component of the quality management system is Quest for quality, which measures the quality of service delivery through six-monthly regional manager self-assessments and quarterly team self-assessments. The regional managers' self-assessment checklist aims to assess the broad business aspects of CRS Australia's service delivery operations against the Disability Services Standards. Team self-assessments use a checklist designed to assess the quality of selected individual client case files and, therefore, more directly evaluate service delivery to individual clients.

34.   The results from the self-assessments are used to determine if national and local benchmarks have been achieved.[15] Given the self-assessment nature of both types of Quest for quality reviews, and the observed variability in the way they are undertaken, CRS Australia could improve the level of assurance it gains by introducing a process to periodically check the results from a sub-sample of reviews. CRS Australia could also examine the guidance provided to staff to ensure that it sufficiently covers the expectations of how a review is to be conducted.

External quality assessment

35.   In addition to the internal quality management system, CRS Australia is also subject to external monitoring arrangements. External accreditation audit arrangements regularly examine key quality and service delivery processes. CRS Australia has maintained accreditation against the Disability Services Standards since 2004.

36.   DEEWR also undertakes routine performance monitoring using a system of star ratings allocated to each site. Prior to 1 March 2010, CRS Australia's service delivery sites ranged in star ratings from one to five, with a network wide mean rating of 3.1.[16] DEEWR also regularly visits sites to

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[15]   The benchmark is set at 85 per cent for all key performance indicators.

[16]   The new star ratings are to be publicly released by DEEWR on a six-monthly basis from August 2011.

perform compliance audits. Forty-one CRS Australia site visits were conducted during 2009.

37.   CRS Australia has used the results of these audits, in conjunction with its other internal quality assessment tools, to identify and examine issues that have broader implications across the whole network.

Client Feedback Including Complaints (Chapter 4)

Feedback

38.   CRS Australia uses a range of feedback mechanisms to obtain clients' views on service delivery. A challenge for CRS Australia is to coordinate these mechanisms so that information can be gathered to assess performance and improve service delivery outcomes for clients.

39.   The primary means of gathering client feedback is through the end of program feedback form. While results in recent years have shown a high rate of client satisfaction, the conclusions that can be drawn are limited by the low response rate (12.5 per cent in 2009–10). A low response rate can introduce elements of non-response bias[17] in the results, which effectively skews the result to clients who were happy with the service.

40.   Obtaining feedback while the client is receiving services is optional and not commonly used by sites. This limits the ability of CRS Australia to address service delivery issues as they arise. Ensuring feedback options are available to clients while they are receiving services would allow service delivery issues to be addressed promptly. Other opportunities for improving client feedback mechanisms exist in relation to:

- undertaking research on the effectiveness of feedback forms from the client's perspective and, where appropriate, updating the forms; and

- making the feedback options available to clients on the CRS Australia website clearer, and including a dedicated client feedback form.

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[17] Some people are more (or less) likely to respond to surveys and this may induce bias in surveys. This can be more pronounced when there is a low response rate to surveys. National Statistical Service, [Internet] *Statistical Clearing House Seminar Series, Drawing Conclusion from Surveys with a Low Response Rate*, NSS, 2004, available from <http://www.nss.gov.au/nss/home.nsf/0/61743489d51ade77ca2571ab002436be/$FILE/Low%20response%20rates%20-%2026%20November%202004.pdf> [accessed on 13 September 2010].

41. Further, to provide a more objective assessment of performance and mitigate the risks of misstatement from the end of program feedback form due to the low response rate, CRS Australia could consider adopting an externally conducted survey[18] that includes job seeker clients who have exited the program.

42. High-level analysis of client feedback data is undertaken and reported to the executive. Reporting is limited to analysis of quantitative responses as the information gathered through free-text client comments is not systematically reviewed. This presents the risk that customer insights accompanying quantitative responses are missed, or trends that can be recognised are not brought to the executive's attention. A level of national reporting that includes an analysis of client comments could help ensure systemic issues and information about service delivery are captured and, where appropriate, action taken.

Complaints

43. CRS Australia has an established complaints management process with accompanying guidance, training and executive support for acknowledging and dealing with complaints. In 2009–10, CRS Australia recorded receiving 295 complaints, a relatively low level representing less than one per cent of clients exiting the program in the year.

44. CRS Australia could improve the complaint and feedback mechanisms available to clients by providing the 'We're Listening' handout[19] as part of the introductory information given to clients; and developing a dedicated complaints form for its website, with a corresponding link clearly identified on the website homepage.

45. Despite having an established framework, the internal complaints process and guidance are not commonly understood by staff. This lack of common understanding impacts on the reliability of complaints data, including the number of total complaints. CRS Australia encourages clients to address complaints to staff at local sites. However, not all staff at service delivery sites have received training in how to recognise, respond to and

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[18] CRS Australia commissioned two external stakeholder surveys in 2007 and 2008, however, DEEWR job seeker clients were not included in the 2008 survey.

[19] The 'We're Listening' handout is an existing CRS Australia publication.

document a complaint. To help ensure all complaints are recognised and captured, CRS Australia could develop and implement a complaints awareness training module for all service delivery staff.

46.   CRS Australia uses its complaints database to undertake high-level analysis that is largely based on the numbers and classifications of complaints. This analysis does not generally include information on the causes of complaints and how they were resolved. A stronger link to how systemic issues with service delivery and personnel behaviour are addressed as a result of a complaint would assist to inform management of how risks are being managed and services are being improved.

Planning, Performance Monitoring and Reporting (Chapter 5)

47.   CRS Australia's planning and monitoring framework encompasses all levels of the business operations. Business plans have clear descriptions of roles, targets, activities and measures to be reported against. Risk management is also included in the planning framework and risk registers and risk management plans are updated as appropriate.

Internal reporting

48.   CRS Australia endorses a sound approach to performance management and reporting that has a focus on financial viability, service delivery and quality. The focus on financial viability and achievement of service delivery targets is present in all aspects of internal management reporting, in particular Disability Management Services, which generated 78 per cent of CRS Australia's total revenue in 2009–10.[20]

49.   While reports containing quality aspects are presented to the Strategic Business Group, (including complaints information, reports on internal reviews and annual quality reports), quality does not have the same focus within the reports as financial viability and service delivery achievements. Reporting against a range of quality key performance indicators from the regions would allow CRS Australia to focus on quality initiatives and monitor their implementation and results.

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[20]   The remainder of CRS Australia's revenue is largely derived from numerous contracts with the private sector and other government agencies for injury management, vocational rehabilitation and business wage assessment services.

50. As a division of DHS, CRS Australia provides monthly reports to the DHS Management Board. This reporting is based on four key results areas and shows that a broad range of indicators are used to track performance in service delivery, personnel, finance and quality accreditation.

External reporting

51. CRS Australia's key performance indicators are set out in the Human Services Portfolio Budget Statements and performance against these indicators is included in the DHS Annual Report. The key performance indicators published in the DHS Annual Report have changed over time making it difficult for stakeholders to assess CRS Australia's performance across years.

52. CRS Australia regularly monitors a range of key performance information as part of its internal reporting. In particular, it budgets and reports on: commencements; job placements; and 13 and 26 week employment outcomes. In order to provide a more complete assessment of CRS Australia's performance to stakeholders, consideration should be given to establishing a consistent set of key performance indicators that provides information on both overall performance outcomes and the quality of services being delivered.

Summary of agency response

53. The Department of Human Services welcomes this report and considers that implementation of its recommendations will further enhance the effectiveness of service delivery by CRS Australia.

54. The Department of Human Services agrees with the recommendations in the report.

Recommendations

The ANAO has made the following recommendations aimed at enhancing CRS Australia's approach to client feedback and complaints and external reporting.

Recommendation No. 1

Para 4.33

To improve service delivery for clients, and also identify broader issues or examples of good practice, the ANAO recommends that CRS Australia review the existing client feedback mechanisms and examine options to:

    a) routinely seek feedback from clients while they are receiving services;

    b) conduct a regular external client survey as the principal means to assess overall client satisfaction; and

    c) analyse comments provided by clients as part of its standard approach to reporting.

DHS response: Agreed.

Recommendation No. 2

Para 4.74

To increase staff awareness and capability to manage complaints, including capturing client complaint data, the ANAO recommends that CRS Australia develop and implement a complaints management training module that can be delivered as part of its training for all service delivery staff.

DHS response: Agreed.

Recommendation No. 3

Para 5.38

To improve annual public reporting on outcomes, the ANAO recommends that CRS Australia establish and report on a set of consistent key performance indicators that could be drawn from information routinely captured, such as employment outcomes (13 and 26 weeks) and job seeker satisfaction.

DHS response: Agreed.

Audit Findings

1.   Introduction

This chapter provides background information on CRS Australia and the disability employment services sector. The audit approach, including the objective, criteria, scope and methodology, is also outlined.

CRS Australia

History

1.1   First commencing operations in 1941, CRS Australia has been providing vocational rehabilitation for some 70 years.[21] The manner and type of services delivered has evolved over time, in line with changes to social policy and the expectations of the Australian Government. CRS Australia's service delivery focus has changed from centre-based care and training aligned with major hospitals up until the late 1970s, to the current community-based service delivery model, which uses a range of allied health providers and vocational and employment specialists in sites and visiting outreach services around Australia.

1.2   CRS Australia provides vocational rehabilitation and employment-related services to the Australian Government and the private sector. CRS Australia is a division of the Department of Human Services (DHS), a *Financial Management and Accountability Act 1997* (FMA Act) agency. Although part of an FMA Act agency, CRS Australia does not receive direct Budget funding; instead, it funds its operations through the payments received for services delivered.

Current Operations

1.3   CRS Australia's primary function is the delivery of Disability Management Services[22], on behalf of the Department of Education, Employment and Workplace Relations (DEEWR). CRS Australia shares this market with 65 private sector providers and, under the current arrangements, has approximately 55 per cent of the national market share.

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[21]   In 1941, the Vocational Training Scheme for Invalid Pensioners commenced. In 1948, it became the Commonwealth Rehabilitation Service and underwent a name change to CRS Australia in 1998.

[22]   Prior to 1 March 2010 called Vocational Rehabilitation Services.

1.4 In 2009–10, CRS Australia recorded an operating profit of $2.3 million. During the year, CRS Australia had some 57 000 clients and earned $197 million in revenue, of which $154 million (or 78 per cent) was derived from the delivery of Disability Management Services. The balance of CRS Australia's revenue was largely earned from private sector work[23] (13 per cent of revenue) and the delivery of Job Capacity Assessments for DEEWR (7 per cent of revenue).

Operational structure

1.5 The day-to-day operations of CRS Australia are managed by the executive, which comprises the General Manager, CRS Australia and two deputy general managers (service delivery and corporate services). As of 1 November 2010, the General Manager of CRS Australia reports to the Chief Executive Officer of Centrelink. Previously, the General Manager reported to the Secretary of the Department of Human Services.[24]

1.6 CRS Australia has a dispersed service delivery network organised into five operational divisions along geographic lines. Within each division are a number of regions, which can include between two to four service delivery sites and additional outreach visiting services. Regions and teams work semi-autonomously, overseen by regional leadership teams.

1.7 In addition to the service delivery divisions, CRS Australia has a number of national corporate functions, such as finance and professional practice, which support the service delivery network. CRS Australia uses virtual teams for many of the national service delivery functions and corporate services support functions.[25] Figure 1.1 shows CRS Australia's structure.

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23 These services include workplace assessments, injury prevention services and return to work programs for injured workers or workers with a disability.

24 The Human Services portfolio is in the early stages of implementing the service delivery reform agenda, which includes the reorganisation of some internal functions and management reporting arrangements.

25 Virtual teams are where team members are physically situated in different sites. For example, Job Capacity Assessment services within the National Service Delivery Team are managed in Western Australia, with staff in Launceston and Hobart.

Figure 1.1

Structure of CRS Australia
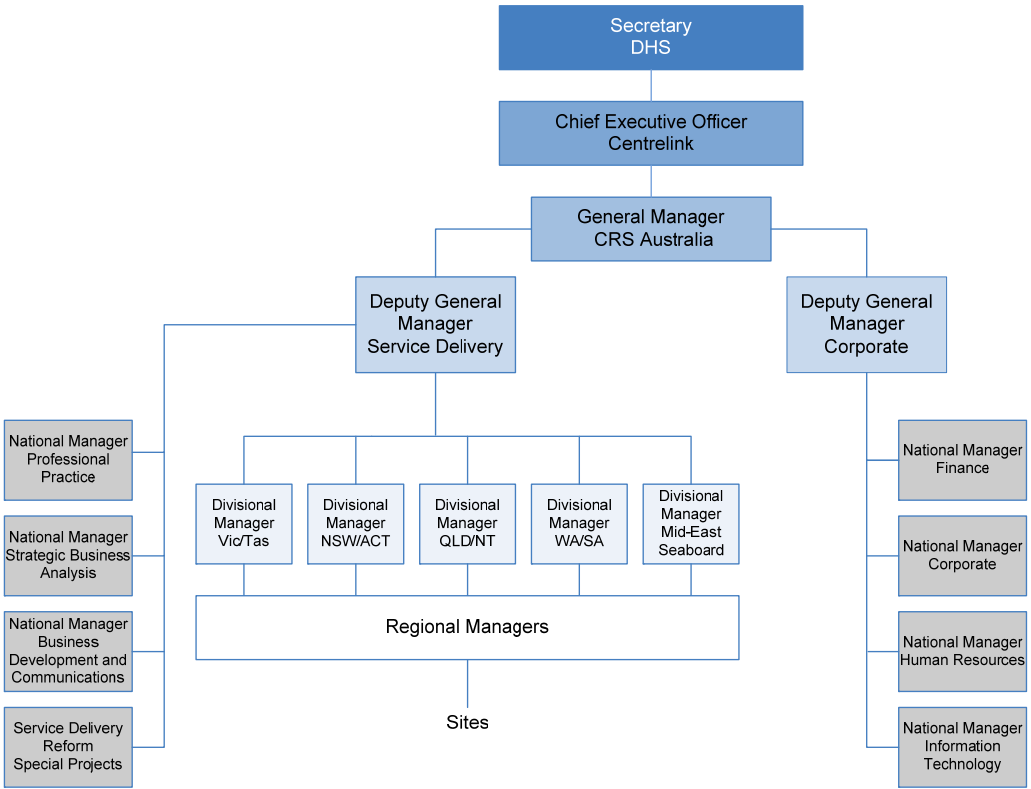
Source: ANAO analysis of CRS Australia information.

1.8 In 2009–10, CRS Australia employed 2053 staff across its service delivery network, corporate and support services. CRS Australia offers Disability Management Services from 185 sites and 140 visiting (outreach) services around Australia. As part of this network, CRS Australia services rural and remote regions (making up 35 per cent of permanent sites), as well as having a significant presence in metropolitan areas. Figure 1.2 shows the location of CRS Australia's 185 sites.

Figure 1.2

CRS Australia site locations
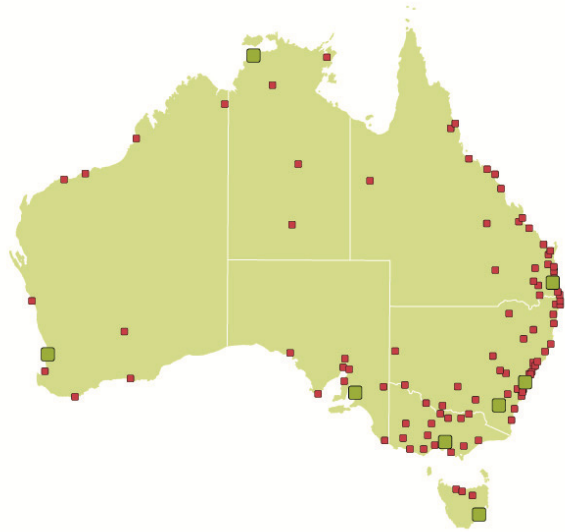
Source: CRS Australia.

Note : As there are multiple sites in cities, dots on map do not always denote a single site.

Disability employment services sector

1.9 The Australian Government, through DEEWR, provides a range of services to assist job seekers to gain employment. As well as Job Services Australia, the mainstream provider of employment services, DEEWR provides specialist employment services that focus assistance on identified disadvantaged groups, such as Indigenous Australians and people with a disability.

1.10 The disability employment services sector has been growing over the last 30–40 years, reflecting the changing views of society towards people with disabilities. Over time, people with a disability have moved from being 'institutionalised…to being encouraged to participate in all aspects of society.'[26] Accordingly, accessible services have developed to support people to gain employment and achieve greater integration in the community.

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[26] Jenkinson, S (2008), *Disability: Local, National and International Trends*, Disability Services Commission, Perth, Western Australia.

1.11 The Australian Government's social inclusion agenda aims to ensure every Australian has the 'capability, opportunity and resources to participate in the economy and their community while taking responsibility for shaping their own lives.'[27] There are a number of mechanisms in place to ensure services are available to all Australians, including people with disabilities. One such mechanism is the Disability Employment Services program.

Disability Employment Services program

1.12 The objective for the Disability Employment Services program as outlined in the DEEWR MOU is:

> to help individuals with a disability, injury or health condition to secure and maintain sustainable employment. The Program Services will increase the focus on the needs of the most disadvantaged job seekers and will achieve greater social inclusion.

1.13 Temporary and permanent disabilities and health conditions encompassed by Disability Employment Services include:

- physical, such as back injuries, muscle and joint problems;

- visual impairment;

- communication and hearing disorders;

- mental health, such as depression, anxiety, schizophrenia; and

- acquired brain injury.

1.14 The Disability Employment Services program has two streams: Disability Management Services[28] and Employment Support Services[29]. Disability Management Services assist job seekers with a disability, injury or health condition who require the assistance of a disability employment service but are not expected to need long-term, ongoing support in the workplace. Employment Support Services assist job seekers with a permanent disability who have an assessed need for more long-term, regular support in the workplace.

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27 Australian Government, Department of the Prime Minister and Cabinet, *A Stronger, Fairer Australia—A National Statement on Social Inclusion*, PM&C Canberra, 2009, p.iii.

28 Prior to 1 March 2010 called Vocational Rehabilitation Services.

29 Prior to 1 March 2010 called the Disability Employment Network.

1.15 Disability employment services providers assist people with disabilities to improve their opportunities for employment so they can achieve greater social inclusion, usually through gaining employment in the 'open' labour market with remuneration at standard award rates. This is in contrast to Australian Disability Enterprises[30] (formerly Business Services), which are commercial businesses that provide employment for people with moderate to severe disability who want to work and choose to do so in a supported employment environment.

Legislation and standards

1.16 The *Disability Services Act 1986 (Cth)* commenced following a review of the funding of programs for people with disabilities during 1983–85.[31] Among the objectives of the Act is the aim of assisting 'persons with disabilities to receive services necessary to enable them to work towards full participation as members of the community'.[32] The Act provides for the Disability Services Standards, which outline 12 standards for service quality supported by 26 key performance indicators.[33] The Disability Services Standards are designed to ensure people with disabilities are being provided with quality and appropriate services to meet their needs.

Quality of services

1.17 The Quality Strategy for Disability Employment and Rehabilitation Services[34], introduced in 2002, provides guidance for all Disability Employment Services program providers on how to meet, at a minimum, the Disability Services Standards. The quality strategy is underpinned by three key

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[30] Department of Families, Housing, Community Services and Indigenous Affairs, *Australian Disability Enterprises, FaHCSIA, 2009,* available from <http://www.fahcsia.gov.au/sa/disability/progserv/providers/AustralianDisabilityEnterprises/Pages/AustralianDisabilityEnterprises.aspx> [accessed on 12 January 2011].

[31] Disability Services Australia, *Life to Live—The history of people with disabilities in Australia—100 years* [Internet] DSA, available from <http://www.dsa.org.au/life_site/text/employment/index.html> [accessed on 23 November 2010].

[32] *The Disability Services Act 1986 (Cth)* s1B.

[33] Schedule 1 of the standards sets out the disability employment standards, rehabilitation program standards and key performance indicators applicable to service providers.

[34] Department of Families, Housing, Community Services and Indigenous Affairs, [Internet] *Quality Strategy for Disability Employment and Rehabilitation Services*, Canberra, 2002, available from <http://www.fahcsia.gov.au/sa/disability/progserv/providers/Pages/QualityStrategyDisabilityEmploymentServices.aspx> [accessed 26 October 2010].

elements of quality management theory: quality assurance, continuous improvement, and complaints and referrals. The objectives of the strategy are to:

- give people with disability confidence in the quality of service delivery and employment outcomes achieved by Australian Government-funded disability employment and rehabilitation services;

- ensure all services meet, as a minimum, the Disability Services Standards;

- make the assessment of quality more objective and measureable;

- link certification to funding;

- reduce government intervention in the day-to-day operations of services; and

- assist services to continuously review and improve the services they deliver. [35]

1.18 Essential to the strategy is the objective measurement of service quality, obtained through the independent assessment and certification of service providers against the Disability Services Standards. This requirement is contained in the *Disability Services Act 1986 (Cth)*.[36] Obtaining and maintaining accreditation is also linked to Australian Government funding arrangements. The certification bodies who undertake the quality audits of providers are accredited by the Joint Accreditation System of Australia and New Zealand (JAS-ANZ).

Disability Management Services provider arrangements

1.19 The Disability Management Services program is managed by DEEWR under contractual or like arrangements. CRS Australia is one of 66 providers of such services. As CRS Australia is part of the Australian Government, it has a Memorandum of Understanding (MOU) with DEEWR for the provision of Disability Management Services. In essence, the MOU is the same as the contractual arrangements DEEWR has in place for the 65 private sector providers.

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[35]   ibid.

[36]   *Disability Services Act 1986 (Cth)* s5, s5A and s10.

1.20 Through the contract (or MOU), DEEWR sets out the services to be provided, the eligibility for the services, the manner in which they are to be provided and the fees it will pay. As part of the contract arrangements, DEEWR makes available on its provider portal[37] 49 guidelines, electronic training modules, and a question and answer service to assist providers to address complex queries in regard to policy, procedures or guidelines.

1.21 To provide incentives for the desired policy outcomes, DEEWR has developed a fee schedule that rewards the achievement of employment milestones. As providers must use DEEWR's computer systems, particularly the Employment Services System, to record Employment Pathway Plans (EPPs) and other information about job placements for clients, DEEWR is able to continually monitor performance.

1.22 The payment model used is only one of the means DEEWR uses to influence service providers' behaviour and to monitor performance. In 2008, DEEWR implemented a system of star ratings applicable to each service delivery site for every provider. These ratings provide for a comparative assessment of sites against peers operating in the same area.[38]

Recent changes to Disability Employment Services

1.23 Prior to 1 July 2007, CRS Australia was the sole service provider of Australian Government funded vocational rehabilitation services. Since that time, the Australian Government has progressively implemented a suite of reforms to the sector, including the introduction of private sector competition within the market.

1.24 In March 2010, DEEWR implemented changes to the Disability Employment Services program. DEEWR advised the changes included:

- switching to wholly demand-driven services, as previously, places in the program were capped with a limited number of demand-driven places;

- focusing the model on the achievement of sustainable employment;

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[37] DEEWR requires all employment service providers to use its ESS computer system, which is accessed via a secure portal across the Internet. Called the 'provider portal', it provides access to its computer system, guidelines and electronic training.

[38] Refer Chapter 3, paragraphs 3.37 to 3.39 for further information on the star ratings.

- increasing resources for participants in remote areas of Australia;

- placing more emphasis on education and training;

- improving responsiveness to employers;

- a change of name and branding;

- increasing the private provider share in the sector; and

- an enhanced performance framework.

1.25 For CRS Australia, the increase in the private provider share has resulted in a reduction in market share from approximately 67 per cent[39] to 55 per cent, and a resultant increase in the number of private sector providers from 19 in 2007 to 65 providers now competing for work under the arrangements for 2010–12.

1.26 While CRS Australia's market share has been reduced, its revenue is expected to be equivalent to that achieved under the previous MOU arrangements due to the structural changes made to the program. For example, the program no longer has capped places and all services are demand driven, allowing for an anticipated greater demand for services and, therefore, a larger number of referrals.

Referral to Disability Employment Services

1.27 The most common way that clients can access Disability Employment Services is through a referral via a Job Capacity Assessment (JCA).[40] Centrelink, on behalf of DEEWR, identifies that a job seeker requires an assessment of their work capacity and any barriers preventing them from gaining employment, called a JCA.[41] During a JCA, the assessor uses medical and other information to make the assessment and then refers the job seeker to the appropriate employment services provider. Currently, JCAs are carried out by Centrelink, CRS Australia, Medibank Health Solutions[42] and a range of

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[39] CRS Australia advised that prior to 1 March 2010 it had 80 per cent of the fixed (capped) place and 50 per cent of the demand-driven market, which equated to 67 per cent of the total market.

[40] Clients can also access Disability Employment Services through the Job in Jeopardy scheme and direct referral (including eligible school leavers).

[41] A Job Capacity Assessment may also be used to make income support decisions, including the granting of a Disability Support Pension.

[42] Previously known as Health Services Australia.

private providers. Recent reforms will bring all JCAs within the responsibility of Centrelink and CRS Australia in 2011. Figure 1.3 shows a simplified version of the process.

Figure 1.3

Disability Employment Services referral process
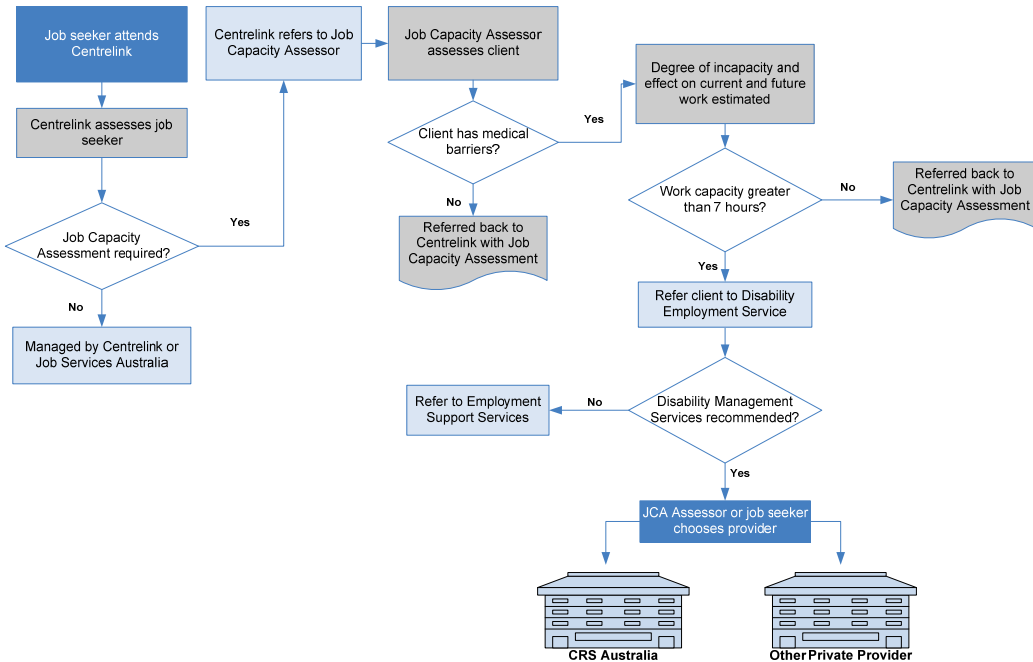
Services provided by CRS Australia

1.28   CRS Australia provides a range of vocational rehabilitation and injury prevention services. Vocational rehabilitation aims to assist a person with an injury or medical condition to maintain or obtain employment. Injury prevention covers a range of services, including work station assessments and work training to assist organisations and their employees to work safely.

1.29   To undertake vocational rehabilitation, CRS Australia assesses a client's medical issues and other barriers to employment and prepares a plan to support them to maintain or obtain employment. Often a client will face multiple barriers, including health, social and psychological issues. Based on the initial assessment, a vocational rehabilitation consultant uses a range of skills, such as motivational interviewing and knowledge of the employment market, to assist clients. CRS Australia also provides discretionary access to training and other medical and social interventions to address barriers to

employment. For example, a rehabilitation plan (such as the EPP) may involve referral to specialist services, such as physiotherapy, occupational therapy, psychology, and/or vocational training courses to improve skills. A rehabilitation plan also includes ongoing case management to assess and monitor how the client is progressing towards employment.

Audit approach

Objective and criteria

1.30 The audit objective was to assess the effectiveness of CRS Australia's delivery of Disability Management Services. In assessing CRS Australia's performance, the ANAO applied the following criteria:

- services are delivered in accordance with CRS Australia's operating procedures, which incorporate the Disability Services Standards and the requirements of the DEEWR MOU;

- CRS Australia has an effective client feedback (including complaints) system, which is used to identify and address business risks and areas for improving service delivery; and

- sound governance arrangements (including performance monitoring and reporting) are in place to monitor service delivery.

Scope

1.31 The audit focused on CRS Australia's operations relating to the provision of Disability Management Services on behalf of DEEWR (for which CRS Australia receives the majority of its revenue). The audit did not specifically examine issues and information relating to the commercial nature of the business, such as profitability levels and competitive neutrality arrangements.

Methodology

1.32 In undertaking the audit the ANAO:

- interviewed management staff;

- visited a selection of 20 urban and regional sites, interviewed 86 service delivery and support staff, and reviewed 183 DEEWR client case files;

- analysed corporate documents and processes, with particular reference to the Disability Services Standards and the DEEWR MOU;

- assessed and analysed CRS Australia's client feedback and complaints processes and systems; and

- mapped performance reporting arrangements, including how CRS Australia assessed available data (internal and external) to target its services and monitor service delivery.

1.33 The audit was conducted in accordance with ANAO Auditing Standards, at a cost of approximately $398 500.

Structure of the report

1.34 The report contains the following chapters:

- Service Delivery (Chapter 2);

- Quality Management (Chapter 3);

- Client Feedback Including Complaints (Chapter 4); and

- Planning, Performance Monitoring and Reporting (Chapter 5).

2.   Service Delivery

This chapter examines the framework used by CRS Australia to deliver Disability Management Services, including how staff are supported to deliver services in accordance with the Disability Services Standards and the DEEWR Memorandum of Understanding.

Introduction

2.1   CRS Australia delivers Disability Management Services for DEEWR using a case management approach, which is a collaborative process of assessing, planning and facilitating services to meet a client's health and vocational needs.

2.2   After a client is referred to CRS Australia, an initial interview is conducted to assess any barriers to employment. The results of this process are recorded in an Employment Pathway Plan[43] (EPP) and a Vocational Planning form. An EPP records the timing of client contact meetings and specific interventions such as training, counselling and other physical support services. The EPP is required to be personalised to the client's needs and regularly updated. The client must sign the EPP in order to agree to the program because, depending on the type of income support payments the client is receiving, certain activities in the EPP are compulsory.[44]

2.3   The Vocational Planning form is an internal requirement that assists staff to record the information necessary to support conformance with the Disability Services Standards. The Standards require that services are coordinated, tailored, flexible, responsive and appropriate to the individual. The Standards also require that the client has input to the program. In addition to the EPP and the Vocational Planning form, case managers record case notes to document the content of meetings and discussions with the client, and their progress in the program.

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[43]   The DEEWR MOU requires that an EPP be completed for each client.

[44]   CRS Australia is required to enforce Centrelink participation requirements, including reporting a job seeker if they do not attend a contact session without a reasonable excuse or do not participate in their vocational rehabilitation program. This can result in cessation of income support payments.

2.4 The EPP and Vocational Plan are regularly reviewed and updated as the client continues to receive services. Figure 2.1 outlines the general service delivery approach for job seeking clients.

Figure 2.1

CRS Australia's case management approach

1. Client is referred to CRS Australia and assessed	
Eligibility for program is established	Strengths, vocational goals and barriers are identified

2. Vocational Rehabilitation plan is established	
Documented in Employment Pathway Plan (EPP)	Documented in Vocational Planning form

3. Client participates in program and job seeking activities		
Client receives allied health intervention as indicated	Client attends regular contact visits with consultant	Client participates in job seeking and skills development activities

4. Client is on pathway to education/employment outcome	
Client attends training if appropriate or achieves education outcome	Client attends work experience, training and/or job interviews and achieves employment outcome

5. Client is managed through Post Placement Support when in work and/or exits program	
Client is in work, contacted regularly and assisted with continued employment until program ends	Client continues in program until it concludes and exits program

Source: ANAO analysis.

2.5 Generally, the maximum length of a Disability Management Services program is 78 weeks.[45] The program may be shorter if the client finds work early and maintains this employment for 26 weeks, which is the final milestone

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[45] The program may be longer in certain circumstances, such as the client requiring extended employment assistance.

for the DEEWR program. When a client obtains employment, CRS Australia maintains contact and provides 'post-placement support' to assist the client to reach the 13 and 26 week employment milestones.

2.6 Over time, CRS Australia has needed to shift to a stronger employment outcome focus. This employment focus is mirrored in the payments CRS Australia receives under the DEEWR MOU, which are weighted towards achieving a job placement for the client and sustaining that employment outcome for 13 and 26 weeks.

Service delivery

2.7 CRS Australia is required to deliver Disability Management Services in accordance with the Disability Services Standards and the DEEWR MOU. To allow CRS Australia to deliver its services in accordance with the Standards and the MOU, it has:

- defined staff roles and the required skills;

- produced and disseminated operational guidelines;

- provided training opportunities; and

- implemented an onsite quality assurance program.

Staff roles and skills

2.8 The Disability Services Standards provide broad guidance to disability service providers on the skills of the staff they should employ. The Standards state that 'each person employed to deliver services to a person with a disability has relevant skills and competencies'[46], however, 'relevant skills' is not defined.

2.9 CRS Australia employs a mix of allied health professionals[47], employment service specialists and administrative staff at its service delivery sites. As at 30 June 2010, CRS Australia employed 1141 allied health professionals as part of its workforce of over 2000 staff.

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[46] Disability Services Standards (FaHCSIA) 2007–Schedule 1-Disability Employment Standards, Standard 11.

[47] Allied health professionals include health professionals with qualifications in occupational therapy, physiotherapy, psychology, rehabilitation, speech pathology and social work.

2.10   Staff at service delivery sites are broadly classified in one of five roles: senior rehabilitation consultant (SRC), rehabilitation consultant, rehabilitation officer, employment services consultant or administration officer. For each of these positions, CRS Australia has defined the roles, responsibilities and necessary qualifications (refer Appendix 2 for a breakdown of staff classifications and roles).

Guidelines

2.11   Effective guidelines contain policies, procedures and process instructions to support staff to deliver services consistent with the organisation's quality standards. CRS Australia uses CRSnet, which is an intranet-based repository of information and guidelines, to provide guidance to staff. CRSnet is used to:

- deliver key messages to the network;

- provide guidance on case management;

- provide access to corporate forms and flyers;

- access corporate research on many aspects of vocational rehabilitation;

- share professional practice knowledge; and

- access corporate and other support services.

2.12   CRSnet contains a dedicated service delivery component that includes extensive guidelines on all aspects of service delivery and a reference library. These guidelines are designed to ensure that service delivery staff meet the minimum standards set out in the Disability Services Standards and comply with the requirements of the DEEWR MOU.

2.13   To support staff to deliver services in line with these requirements, specific guidelines are available for dealing with all types of clients (DEEWR and other) using CRS Australia's case management approach. For example, CRSnet includes an interview checklist that the case manager completes at the initial interview. The checklist contains a series of questions aimed at ensuring compliance with the Disability Services Standards and the DEEWR MOU. The checklist helps to determine a client's eligibility for the program and outlines the information about the client's rights and obligations, and information on feedback and complaint avenues that must be provided to a client.

2.14   To further support staff to deliver services in accordance with the Disability Services Standards and the DEEWR MOU, CRS Australia has a

national email service called case queries that provides advice to SRCs to assist them with managing complex issues.

Access and use by staff

2.15   Overall, the service delivery staff interviewed indicated that they regularly used CRSnet and agreed that it was accessible and contained much of the information and guidance that was required for day-to-day service delivery. Although staff reported occasionally having issues with the amount and complexity of information and guidelines on CRSnet, CRS Australia has in place processes to minimise inefficiencies. For example, to address the issue of failed searches, CRS Australia monitors and analyses the search terms used, and makes changes to the metadata[48] on documents available through CRSnet to improve future searches.

Monitoring and updating guidelines

2.16   CRS Australia monitors how staff access CRSnet. Statistics are collected on a monthly basis to show how many hits any one page receives and what search terms are used to find this information. The monitoring of hits allows CRS Australia to identify sites in the service delivery network with low rates of accessing the guidelines, and to consider alternative ways of delivering the information.

2.17   To maintain their relevance, and to ensure they are consistent with other aspects of training and quality standards, guidelines need to be reviewed and updated as service delivery requirements change. CRS Australia considers and incorporates into its guidelines suggested changes to training packages identified by those delivering the training. This provides for consistency between the training and the guidelines. Similarly, where client feedback indicates that an amendment or clarification to a guideline is required, this is investigated and, where appropriate, action is taken to update it.

2.18   CRS Australia advised that changes in March 2010 to the DEEWR MOU introduced additional guidance for disability employment service providers. CRS Australia updated and removed guidelines from CRSnet that duplicated those available on the DEEWR provider portal and advised that it continually assesses internal guidelines and DEEWR guidance to minimise duplication.

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[48]   Metadata is a set of data that describes and gives information about other data to assist in electronic searching.

Training

2.19   The provision of training supports staff to deliver services according to guidelines and service standards. Induction training and ongoing learning and development provide opportunities for staff to establish and develop their professional and service delivery skills.

2.20   CRS Australia allocates funding for training on a regional basis. These budgets are managed by the regional manager and, while there is no specific allocation per staff member, the training budget is agreed in consultation with the respective divisional manager. Potential training requirements are identified as part of the performance appraisal process and collated by the Learning and Development area. CRS Australia then develops and provides a learning and development calendar that offers a number of training courses for staff over the year.

Induction training for new staff

2.21   CRS Australia provides a corporate induction training package for all new employees. The purpose of the training is to introduce staff to CRS Australia and its services, as well as provide instruction on business operations. In addition to undertaking the corporate induction, rehabilitation consultants and employment specialist consultants complete an additional component called a commencement plan. This component is designed to provide them with additional skills development customised to their respective roles and includes projects overseen by a mentor.

Training for ongoing staff

2.22   CRS Australia staff complete a development plan following discussion with their manager as part of their annual performance plan. As part of this plan, training and development needs are identified and activities to address these needs are agreed.

2.23   CRS Australia continues to develop training modules that are relevant to all staff, such as the dual case management approach[49] to service delivery. CRS Australia uses different means, such as newsletters, a learning and

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[49]   The dual case management approach allows for a case manager and an employment specialist to work with the client simultaneously. This approach differs from the standard case management approach where the case manager works with the client until they are considered ready for job-seeking activities and are referred to an employment specialist at such time.

development calendar and notices on CRSnet, to make staff aware of training activities. However, recognition of some of these training opportunities, particularly by those staff with a longer period of service, was low. This was indicated by some staff who believed that little of the internal ongoing training available was appropriate for them.

2.24 In recent years CRS Australia has undergone a number of changes in how it delivers its services. Ongoing training is a key factor to these changes being taken up quickly and effectively. To improve staff awareness of the training activities available, CRS Australia could consider reviewing its existing approach to promoting training to ensure it is adequately reaching all staff.

Training for administrative staff

2.25 Administrative staff have access to the CRS Australia induction training and five training courses that focus on service delivery and administration. CRS Australia also advised that it had implemented a commencement plan for administrative staff in September 2010, however, prior to that time, no specific plan was in place.

2.26 Administrative staff play an important role in CRS Australia's business and are often the first point of contact for clients, which can include initially receiving feedback, including complaints. The majority of administrative staff advised that most of their training was on-the-job and there was limited formal training tailored to their roles. This was also reflected in the relatively low attendance rates for the existing tailored training courses.

2.27 To improve a client's overall service delivery experience, administrative staff could benefit from more formal training on specific aspects of CRS Australia's service delivery processes, including handling client feedback and complaints awareness.[50] Given the feedback from staff, and the low take-up for existing training opportunities, increased promotion of the courses available to administrative staff and their managers may be appropriate. In addition, identifying preferred and/or compulsory training for administrative staff in the new commencement plan and learning pathway would assist with formalising the training expectations.

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[50] Refer Chapter 4, paragraphs 4.52 to 4.57 and 4.74 (Recommendation No.2) for further discussion on staffing training in complaints handling.

Onsite quality assurance

2.28 CRS Australia employs over 2000 staff across a national network that delivers services from 185 sites. The size and nature of such an operation presents an inherent risk of variance in service delivery, that is, providing too much service (over-servicing), or too little service (under-servicing). To help mitigate this risk, CRS Australia established the senior rehabilitation consultant (SRC) role in 1997. As of 31 December 2010, there were 142 SRCs providing onsite support and advice to staff on service delivery standards; discussing and reviewing case files; monitoring client feedback; and addressing tier one client complaints.[51]

History of the SRC role

2.29 Prior to July 2009, the SRC role was a temporary position, which meant that a staff member performed the role for a limited period before another member took on the role. In 2008, the SRC role was examined as part of an organisational review. The review found that SRCs were taking on the people and resource management activities of the regional manager role, which often resulted in the SRC being less effective in their professional leadership and quality assurance roles. The review also found that there was a high workload requirement and consequently an 'unreasonable ask' of the SRC role.

2.30 The outcome of the review was to define and clarify a permanent SRC role that is supported by an induction program. The professional leadership and quality assurance responsibilities were retained and, in some cases, SRCs share responsibilities with the regional manager to better distribute the workload and provide a career path for SRCs. In implementing these recommendations, CRS Australia established regional leadership teams to support the new arrangements.[52]

Role of SRCs

2.31 SRCs play an important role in driving consistency in service delivery across the network and ensuring that the needs of clients are being appropriately met. There are three elements common to the SRC role—service

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[51] SRCs may also assist in the investigation and management of tier two and three complaints on the request of the divisional manager, the Service Delivery Support Network or the executive.

[52] A regional leadership team usually includes the regional manager, SRCs and senior administrative staff in a region.

delivery, operational management and professional leadership, and quality assurance.

2.32   SRCs are expected to take on a case management load as part of the service delivery element. The case management role can comprise between 10 to 60 per cent of an SRC's total workload and include assessing clients at intake and conducting initial interviews.

2.33   As the senior allied health professional, SRCs are required to undertake a team leader role and provide onsite technical support, including: answering technical queries; providing advice on organisational, operational and professional matters; and, where appropriate, oversighting the services provided to clients by the team.

2.34   The SRCs' professional leadership responsibility includes coaching and mentoring, and delivering training and information on service delivery matters to encourage the sharing of professional knowledge and experience. By advising staff on professional practice, the SRC can identify areas for staff personal development and also build their management skills. In addition, the SRC is responsible for, and involved in, quality assurance activities such as Quest for quality[53] and case reviews.

Case reviews

2.35   CRS Australia requires that all cases be reviewed while clients are receiving services. CRS Australia's guidance on case reviews states:

> Cases will be reviewed at a strategic time within a program. Suggestions include:
>
> - two months from program commencement;
>
> - six months if the job seeker is not actively job-seeking;
>
> - 12 months if the job seeker is not in employment;
>
> - following employment placement (to ensure adequate post placement support); and
>
> - any other critical phases as identified by the regional leadership team.[54]

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[53]   Quest for quality is the name give to CRS Australia's internal quality assurance process.

[54]   CRS Australia internal document—*CRS Net: Case Review*.

2.36   Undertaking case reviews informs the SRC about the level of service being provided to clients at the sites they supervise. If detailed case notes are available, the SRC can see whether the client is receiving the services appropriate to their vocational rehabilitation plan. The SRC can also provide feedback to the case manager on their work.

2.37   CRS Australia has developed a range of forms that are available to assist SRCs to perform and record case reviews. CRS Australia's guidance outlines what to consider when completing a case review. The ANAO observed a number of variations in the methodology and process for completing case reviews, including:

- in some instances the review involved a discussion with the case manager without the physical file being reviewed;

- some case files did not indicate whether any of the suggested reviews had been conducted or their outcome; and

- SRCs have their own caseload, however, these files are not subject to the review process.

2.38   Case reviews are integral to CRS Australia's internal quality assurance system. Currently there is no requirement for regions to report on case reviews (numbers conducted or key findings), other than those carried out through the Quest for quality self-assessments.[55] Including in regional manager reports information about case reviews completed could assist in providing management with an increased assurance about the effectiveness of this activity and highlight any areas of better practice or systemic weakness.

Ongoing role of SRCs

2.39   The SRC role provides a framework for delivering quality services. However, the number and relative weighting of SRC duties can impact on the ability of SRCs to adequately attend to quality assurance activities. While some SRCs have the capacity to control their workload, operational pressures may require them to take on a larger case management load in addition to their other tasks. A small number of SRCs had client caseloads exceeding 60 per cent, which impacted on their ability to perform quality assurance activities.

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[55]   Refer paragraphs 3.10 to 3.19 for discussion of Quest for quality self-assessments.

2.40   CRS Australia provided guidance to SRCs to allocate 10 to 60 per cent of their time to service delivery and the rest to their remaining duties. This approach provides for flexibility in the role that can be tailored to the particular circumstances of the SRC, such as those who provide oversight at multiple sites, which can be separated by significant distances. However, it also results in some SRCs with little or no case management duties; and others with more than the recommended case management load, leaving little time for case reviews.

2.41   Given the revised SRC role has now been in place for over 18 months, this provides an opportunity to undertake a post-implementation assessment of the changes to ensure the expected outcomes are being achieved. CRS Australia advised that it commenced a review in January 2011, which was completed in March 2011.

Conclusion

2.42   CRS Australia has an established operational framework to support the delivery of Disability Management Services. CRS Australia employs 1141 allied health professionals and a mix of employment service specialists and administrative staff at its 185 service delivery sites across Australia.

2.43   To assist staff delivering services to meet the requirements of the Disability Services Standards and DEEWR MOU, CRS Australia has defined the roles and responsibilities and necessary qualifications. Staff are provided with procedural and service delivery guidelines, and also have access to induction training and a range of ongoing learning and development opportunities. To improve staff awareness of the training activities available, CRS Australia could consider reviewing its existing approach to promoting training to ensure it is adequately reaching all staff.

2.44   To monitor and support service delivery within and across sites, CRS Australia has developed the SRC role. Among other tasks, 142 SRCs perform a quality assurance role, principally through client case file reviews that are central to maintaining a consistent approach to service delivery. The ANAO observed a number of variations in the methodology and process for completing case reviews, such as some case files containing no indication that a review had been conducted. CRS Australia has specifically designed the SRC role to allow for flexibility in the tasks undertaken. While this allows regions to tailor the working arrangements to suit the operational environment, it has meant that in some cases this impacts on the quality assurance role of the SRC.

2.45 The revised SRC role has been in place for over 18 months and a review of the changes made would provide an opportunity to assess whether the expected outcomes of, and support for, the SRC role (particularly quality assurance), are being achieved. CRS Australia advised that it commenced a review in January 2011, which was completed in March 2011.

3.   Quality Management

This chapter examines CRS Australia's use of quality management to support service delivery. It also outlines the external quality monitoring processes applied to CRS Australia.

Introduction

3.1   CRS Australia's vision is to be recognised as the outstanding provider of disability employment, assessment and injury management services in Australia.[56] To support its aim of being a provider of high quality disability employment and vocational rehabilitation services, CRS Australia developed an internal quality management system. The system is designed to meet the requirements of the Quality Strategy for Disability Employment and Rehabilitation Services and to monitor, assess and support service delivery performance.

3.2   To improve processes and services, CRS Australia's internal quality management system, needs to effectively:

- support service delivery staff to provide quality services;

- monitor service delivery and identify issues; and

- analyse and address issues.

3.3   Figure 3.1 illustrates the main elements of CRS Australia's quality management system.[57]

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[56]   Department of Human Services, *Forward to 2012—CRS Australia Strategic Plan 2009-2012*, DHS, Canberra, 2009, p.5.

[57]   Determining and promulgating quality standards is discussed in Chapter 2. Client feedback including complaints processes are covered in Chapter 4.

CRS Australia's quality management system
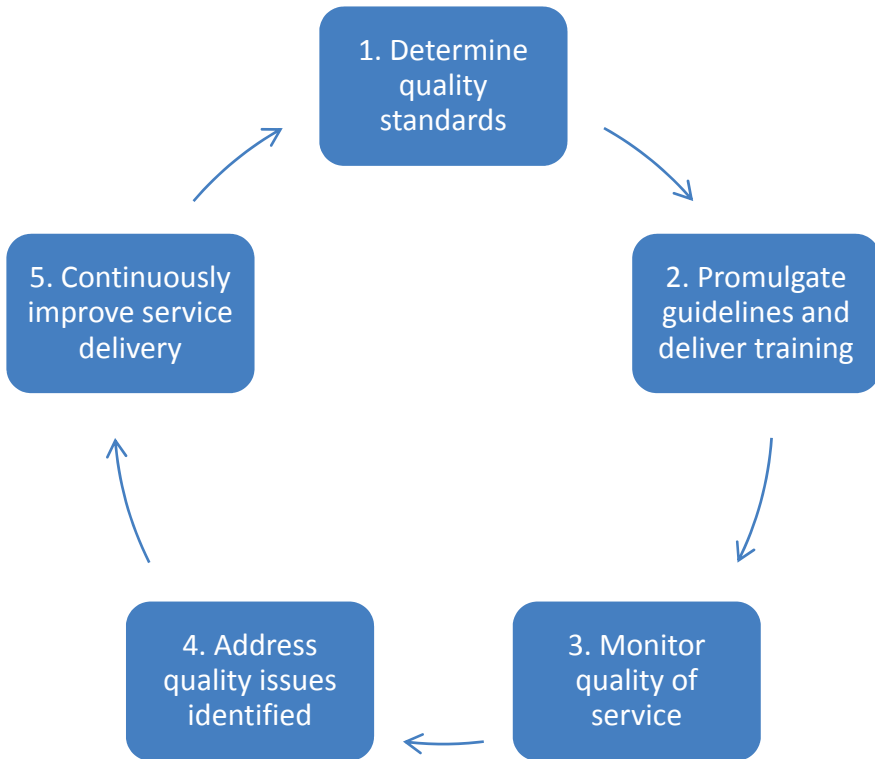
Source: ANAO analysis.

3.4 In addition to the internal quality management system, CRS Australia is subject to external monitoring arrangements including:

- external accreditation audits (triennial and annual surveillance); and

- DEEWR compliance and performance monitoring and reporting.

Supporting service delivery staff

3.5 The Service Delivery Network Support team, within the Service Delivery branch, is responsible for supporting staff to deliver quality services and for monitoring service delivery against the quality standards. The purpose of the Service Delivery Network Support team is to assist all service delivery staff to deliver high quality vocational rehabilitation, injury management,

assessment and prevention services.[58] These support services complement and support the onsite quality assurance undertaken by SRCs and the ongoing review and updating of guidelines and training, as discussed in Chapter 2.

3.6 Where possible, the Service Delivery Network Support team takes a proactive approach and endeavours to pre-empt potential problems that service delivery staff may face. An example of this was demonstrated with the new DEEWR MOU arrangements that commenced on 1 March 2010. The Service Delivery Network Support team developed implementation and communication plans targeted at assisting service delivery staff in the lead-up to the new arrangements. CRS Australia increased the resources dedicated to its email help desk services (case queries) to assist staff during transition and was able to capture issues with the new computer system and business rules. CRS Australia was then able to use this information to tailor support to staff and also inform its ongoing relationship and discussions with DEEWR.

Monitoring service delivery and identifying issues

3.7 The Service Delivery Network Support team has responsibility for monitoring the quality of service delivery. Within CRS Australia there are three main tools used to gather information to inform this task, namely:

- Quest for quality;

- internal audits (service delivery focused); and

- internal quality reviews.

3.8 The Service Delivery Network Support team coordinates these activities and analyses the information obtained to provide an ongoing assessment on the quality of service delivery to the executive.

Quest for quality

3.9 Quest for quality is CRS Australia's central approach to support the delivery of quality services.[59] Primarily through undertaking six-monthly

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[58] CRS Australia internal document, *Business Plan—Service Delivery Network Support 2009-10*, p. 2.

[59] Chapter three discusses Quest for quality as applied to DEEWR case management. The Quest for quality checklists have also been developed for non-DEEWR case management aspects of CRS Australia's operations.

regional manager self-assessments and quarterly team self-assessments, CRS Australia monitors its performance with regard to:

- key customer (DEEWR and other commercial clients) requirements;

- standards, which are customer service standards or, in the case of DEEWR clients, the Disability Services Standards;

- feedback from customers and clients; and

- quality indicators, which is compliance against indicators such as the key performance indicators associated with the Disability Services Standards.

Self-assessments

3.10   The six-monthly regional managers' self-assessment checklist aims to assess the broad business aspects of CRS Australia's service delivery operations against the Disability Services Standards. Not all standards are measured by every region or division each period. The national results of the regional managers' self-assessments are compiled and reported on for all KPIs. Overall, the national results for 2007 to 2009 showed a high rate of compliance with scores ranging from 95 to 100 per cent for all KPIs.[60]

3.11   Team self-assessment checklists are completed every three months for a sample of case files in all CRS Australia service delivery sites. These assessments are designed to assess the quality of selected individual client case files and, therefore, more directly evaluate service delivery to individual clients. CRS Australia aims to achieve an 85 per cent score for internal compliance with each Disability Services Standard as outlined in its checklist.

3.12   CRS Australia's guidelines do not specify how teams are to conduct the assessments. The self-assessments are generally completed by members of the service delivery team at each site, with the SRC providing expert technical advice where required. Some sites indicated that the assessment process was undertaken by individuals, with the team meeting at the completion of the assessments to discuss the process. This approach is consistent with the rationale behind a team assessment and allows staff to use the checklists, the assessment process and the team discussions to improve the quality of services, as well as providing an opportunity to better understand the quality

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[60]   In 2009, KPI 5 relating to participation and integration was scored at 87.5 per cent.

standards and expectations of CRS Australia management. At other sites, however, the individual items on the checklist were discussed by the team and then an agreed score was determined. Other approaches included the SRC taking on different roles, including one site where the SRC, rather than the team members, completed the assessment.

3.13   Table 3.1 shows the number of files reviewed through the Quest team self-assessment process from 2007 to 2010. In 2010, 15.4 per cent of files were reviewed.

Table 3.1

Number of files reviewed by division for the years 2007–2010

Year	NSW/ACT	Qld	SA/NT	Vic/Tas	WA	Nationally
2007	2657	1225	768	1668	598	6916
2008	4639	2518	1504	3187	1189	13 037[61]
2009	3171	1857	963	2413	772	9176
2010[62]	2618	1489	843	2177	638	7765

Source: CRS Australia.

Reporting

3.14   CRS Australia has a site benchmark of 85 per cent compliance against each of the standards outlined in the checklists. Table 3.2 shows the national average results, as calculated by CRS Australia, for the calendar years 2007 through to 2010 for the team self-assessments of client case files. The results show that CRS Australia consistently meets or exceeds it benchmark target for the majority of KPIs. The shaded areas in Table 3.2 highlight the KPI results that were below or close to the benchmark.

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[61]   CRS Australia advised that the reason for the high number of self-assessments in 2008 was due to issues with compiling the sample and a greater number of files than required were nominated for review.

[62]   In 2010, divisional boundaries were changed and the Mid-Eastern Seaboard Division was introduced (covering Southern Queensland and Northern New South Wales). File reviews undertaken in this division are 511 for 2010. This figure is incorporated into the NSW and Qld figures in the table.

Table 3.2

Average national Quest team self-assessment yearly results 2007–2010

Standard	Description	KPI	*2007	2008	2009	2010
1	Service access	1.2	86.5	93.5	96	94.83
2	Individual needs	2.1	92.25	90.5	85.25	88.5
		2.2	91.5	88.5	81.25	86.85
		2.3	88.25	95.75	95	92.88
3	Decision making and choice	3.1	96	97	95	98.05
		3.2	96.75	93.5	94.75	97.7
4	Privacy dignity and confidentiality	4.1	92.75	96.25	96.25	94.9
		4.2	100	99.5	98.5	98.98
5	Participation and integration	5.1	95.5	97	88.75	93.7
6	Valued status	6	98	98.25	95.75	89.93
7	Complaints and disputes	7.1	93.5	93	96	98.53
		7.3	94.75	94.25	96.25	99.23
9	Employment conditions	9.1	84	82.75	90.5	95.75
		9.2	89.75	89	93.25	96.75
		9.3	85.25	80.5	90	94.35
10	Service recipient training and support	10.1	97.5	98	93.75	95
12	Protection of human rights and freedom from abuse	12.1	91.75	97	98.75	99.18
		12.2	91	94.75	97.5	99.83

Source: CRS Australia.

*Note: The results are expressed as percentages for all years shown.

3.15   At the local level, the results from the Quest self-assessment checklists are used to determine if the benchmarks at the site level have been achieved. As part of the Quest report compiled by the site, CRS Australia requires each site to identify any remedial action to be undertaken to address shortfalls in the achievement of benchmarks or to address issues identified during the self-assessment process.

Limitations to Quest results

3.16   By their self-assessment nature, regional manager and team Quest results are subjective. Self-assessment can sometimes lead to a misstatement of results, usually an overstatement of performance. Self report bias has been well documented in research, particularly where staff desire to provide socially acceptable responses during self-assessments.[63] Therefore, it is important that sufficient guidance on how to conduct an assessment is provided to staff, and the results from assessments are able to be verified.

3.17   The regional manager self-assessment results are based on a manager's assertions about the service delivery systems operating within the sites in the region. In some cases, however, these may not be easily verifiable. In contrast, financial and business compliance self-assessments used by CRS Australia are more readily subject to objective measurement.

3.18   The team self-assessments provide instruction to staff on the quality expectations of services provided to clients and the information to be recorded in client case files. However, they also rely on staff assertions[64] and the observed variance in their conduct can also lead to inconsistent results.

3.19   To improve the level of assurance gained through the regional manager and team self-assessments, CRS Australia could enhance the processes by periodically reviewing a sub-sample of completed assessments. Further, to help reduce the potential of an inconsistent approach being adopted across the network, CRS Australia could consider reviewing and, where required, updating its guidance on how the assessments, particularly the team self-assessments, are to be conducted.

Internal audits and quality reviews

3.20   As CRS Australia is part of DHS, internal audits focused on CRS Australia service delivery are included in the department's internal audit program. CRS Australia uses the internal audit function to assist in identifying areas for improvement, including enhancing procedural guidance and tailoring training. Where an issue has been identified, CRS Australia may then

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[63]   S I Donaldson and EJ Grant-Vallone, 'Understanding Self-Report Bias in Organizational Behaviour Research', *Journal of Business and Psychology*, Vol. 17, No. 2, 2002.

[64]   The risk of overstatement is some degree mitigated by the chance of external scrutiny where a site may be selected for assessment during an accreditation audit

undertake a focused internal quality review to further analyse whether the remedial action has been effective, or to gauge how processes are performed in the service delivery network. Quality reviews can also be initiated when risks are identified through the Quest for quality results. Once such example was a 2010 review that assessed the processes surrounding the verification of clients' wages (refer paragraph 3.26).

Analysing and addressing issues

Analysis of issues identified

3.21   Data gathered through the Quest assessments, internal audits and internal quality reviews is analysed and reported to the executive and staff through quarterly and annual reports. Reports are also generated for the executive and staff on client feedback and complaints. It is through these quality management system reporting mechanisms that service delivery issues, either at specific sites or across the network, are identified or analysed.

Addressing issues indentified

3.22   Once an issue has been identified there are a range of options to address the problem. For those issues that have a wider network impact, updating guidance, modifying training and/or delivering organisational-wide messages are ways to address the causes.

3.23   Internal guidelines are revised on a regular basis and this includes basing changes on the insights gained from the quality management system. With regard to training, Learning and Development meet regularly with representatives of the Service Delivery Network Support team. In addition, input on training needs from operational areas is gathered through divisional managers at the executive forum, the Strategic Business Group. Combined, these processes allow desired practices identified through the quality management system to be incorporated in training programs.

3.24   From a network perspective, the *Quality of Service Delivery to DEEWR funded job seekers 2009* report, made a number of recommendations to improve the focus on quality service delivery. For example, it recommended that regional managers oversee the implementation of quality improvement strategies within the region and provide feedback to service delivery staff and SRCs as part of their performance reviews. In addition, regional managers are required to report on their region's implementation of quality improvement activities in their quarterly reports and performance reviews.

3.25 CRS Australia's use of information gathered through internal quality assurance tools to improve service delivery outcomes is outlined in the following example.

Wages verification

3.26 In 2007, an issue with the verification of wage conditions was identified (KPIs 9.1 and 9.3).[65] In response, CRS Australia analysed the problem and implemented a centralised unit to check the wages and conditions of clients placed into employment against the respective awards. The centralised unit was able to build up expertise, which was difficult to obtain at service delivery sites as staff only occasionally had to assess award conditions. In March 2010, an internal review was undertaken to assess whether CRS Australia service delivery staff were using the service as required and a high level of compliance was reported. As a result of a concentrated effort in this area, by 2009, the process improvements had filtered through the network and the team self-assessment results were, on average, over five per cent above the benchmark (refer Table 3.2).

Improving services and processes

3.27 The Disability Services Standards and the Quality Strategy for Disability Employment and Rehabilitation Services specify that continuous improvement should be incorporated into the quality management system used by providers.

3.28 An agency can strive for continuous improvement by modelling and sharing examples of innovation and better practice both at the formal and informal level. Formal mechanisms have been established within CRS Australia called Networks of Excellence (NOEs).[66] By using the expertise within the service delivery network, a NOE project team is given a specific objective to develop improvements, such as aspects of service delivery, researching a topic or products to offer to customers. Since 1997, NOEs have generally targeted professional service delivery and have drawn on expertise

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[65] The Disability Services Standards and the DEEWR MOU specify that the employment conditions, including wages, for a job placement achieved for a job seeker are consistent with the relevant award. CRS Australia cannot claim a job placement outcome unless these requirements are met.

[66] The objective of the CRS Australia Networks of Excellence (NOEs) is pursuing excellence in the provision of rehabilitation services through identifying, supporting and promoting best practice in a range of specified service delivery areas.

from within the network. A 2009–10 internal review of NOEs recommended broadening their scope to include the development and evaluation of products and services to improve competitive advantage, efficiency and effectiveness, among other things. Current NOE topics include rehabilitation, employment and assessment services.

3.29 The ANAO also found examples of innovation[67] and better practice within the service delivery network. For example, one site demonstrated their responsiveness to clients' needs by introducing a group session—Look Good, Feel Good—that aimed to address personal grooming and self-esteem issues for female clients. This group session used the services of a hairdresser and a cosmetics consultant to demonstrate techniques to enhance personal grooming and self-esteem.

3.30 More broadly, CRS Australia supports continuous improvement by facilitating and encouraging the sharing of information and ideas through forums such as manager conferences, SRC forums and other presentation opportunities.

Integrated case management system

3.31 During 2010, CRS Australia proposed to implement the Service Delivery Lite project. The project was designed to develop in-house enhancements to existing systems to facilitate extra functionality in the short term, while alternative options for an integrated case management system were explored. CRS Australia advised that the development and implementation of Service Delivery Lite was stopped in October 2010 due to a proposed electronic document management system to be implemented by DHS. Currently, CRS Australia is examining options to implement an integrated case management system.

3.32 An integrated case management system could provide administrative efficiencies that in turn allow staff to focus an even greater amount of time to servicing clients. From the management perspective, an integrated case management system could also offer easier access to performance information.

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[67] Innovation is defined as is the application of new ideas to produce better outcomes. ANAO, *Innovation in the Public Sector—Better Practice Guide*, December, 2009, Canberra, Australian National Audit Office, p. 1.

External quality monitoring

Disability Services Standards accreditation

3.33   CRS Australia is required to gain and maintain accreditation under the Disability Services Standards. Maintaining accreditation also acts as an indicator of the overall quality of CRS Australia's services and is one of its key performance indicators for annual reporting to Parliament.

3.34   Accreditation under the Disability Services Standards involves an independent assessment (audit) of a provider's operations by a certification body that has been separately accredited by JAS-ANZ to undertake this role. Providers engage a certification body to undertake the accreditation audits, however, the audit reports are given to both the provider and FaHCSIA.[68] An initial accreditation audit is conducted with re-accreditation audits completed every three years. Surveillance audits are carried out in the intervening years.

3.35   The auditing process is supported by an audit methodology and statistically based sample selection. The documentation of the methodology to be applied is publicly available on the Internet.[69] Surveillance audits are smaller-scale audits, involving fewer sites but principally following a similar audit methodology to the full accreditation audit. CRS Australia has maintained its accreditation since it was first achieved in 2004.

3.36   For CRS Australia, the accreditation and re-accreditation audits involve approximately 20–24 site visits, client case file reviews and focus groups involving clients. Audit results for CRS Australia have generally found conformity with the Disability Services Standards and allowed accreditation to be maintained. Where minor non-conformities have been noted, CRS Australia has acted to address them.[70] CRS Australia has used the results of these audits,

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[68]   FaHCSIA administers the external quality assurance system for Disability Employment Services providers. This includes monitoring the accreditation of providers against the Disability Services Standards.

[69]   Joint Accreditation System of Australia and New Zealand, [Internet] *Procedure 18 issue number 3*, January, 2008, available from <http://www.jas-anz.com.au/images/stories/Documents/Procedures/procedure18.pd> [accessed 5 November 2010].

[70]   A minor non-conformity is where the requirements of a key performance indicator are not fully met at a site but this does not reflect the performance of all sites audited or the organisation generally. A major non-conformity is where the requirements of a key performance indicator associated with a Disability Services Standard are not met, or the outcome is ineffective. To maintain certification under the Disability Services Standards, CRS Australia is required to address non-conformities identified by accreditation audits.

in conjunction with its other internal quality assessment tools, to identify and examine issues that have broader implications across the whole network.

DEEWR performance monitoring

3.37 The payment model used by DEEWR is only one of the means it uses to influence service providers' behaviour and to monitor performance. In 2008, DEEWR implemented interim star ratings for each service delivery site for every provider. These ratings provide for a comparative assessment of sites against peers operating in the same employment service area. DEEWR uses statistical analysis that incorporates geographical and demographical characteristics into the methodology for generating the star ratings. For example, where there is a high long-term unemployment rate in an employment service area with little job opportunities, this is factored into the star rating.

3.38 The star ratings system is based on a scale of one to five with a star rating of one indicating a comparatively lower performing site and a star rating of five indicating that the site is comparatively high performing. Prior to 1 March 2010, CRS Australia's service delivery sites ranged in star ratings from one to five, with a network wide mean rating of 3.1. New star ratings for the Disability Employment Services contract, which use the variation from the average performance to accord ratings, are released to providers on a quarterly basis, commencing in February 2011. Star ratings are to be publicly released every six months, with the first release planned in August 2011.

3.39 In addition to the star ratings framework, DEEWR undertakes compliance audits at sites, focusing particularly on servicing participants and claiming fees. CRS Australia reported to the executive on these compliance audits in the *Quality of Service Delivery Report 2009.* A total of 41 site monitoring visits were undertaken by DEEWR during 2009. No major issues were raised although opportunities for improvement, such as evidence to substantiate employment outcomes, were highlighted.

Conclusion

3.40 CRS Australia has a quality management system designed to align with the Disability Services Standards and the Quality Strategy for Disability Employment and Rehabilitation Services, and also to meet the requirements of the DEEWR MOU. The Service Delivery Network Support team within the Service Delivery Branch plays a central role in implementing the quality management system. The system comprises three key elements, namely: Quest

for quality self-assessments, internal audits and internal quality reviews. Combined, these processes work well to help inform management on the quality of service delivery.

3.41 Quest for quality is divided into two forms of self-assessment: regional managers and teams. The team case file reviews are designed to be both a review tool and also to provide instruction to staff on the quality expectations. Given the self-assessment nature of both types of Quest for quality reviews, and the observed variability in the way they are undertaken, CRS Australia could improve the level of assurance it gains by introducing a process to periodically check the results from a sub-sample of reviews. CRS Australia could also examine the guidance provided to staff to ensure that it sufficiently covers the expectations of how a review is to be conducted.

3.42 CRS Australia has a focus on continuous improvement as demonstrated through initiatives such as the Networks of Excellence. CRS Australia advised that it was also considering proposals to implement an integrated case management system. An integrated case management system has the potential to improve business practices and deliver operational efficiencies that would benefit both CRS Australia and its clients.

3.43 In addition to the internal quality management system, CRS Australia is also subject to external monitoring arrangements. External accreditation audit arrangements regularly examine key quality and service delivery processes. Since first obtaining accreditation in 2004, CRS Australia has maintained this status through successive audits.

3.44 As the policy department for employment programs including Disability Management Services, DEEWR also undertakes routine performance monitoring using a system of star ratings allocated to each site. Prior to 1 March 2010, CRS Australia's service delivery sites ranged in star ratings from one to five, with a network wide mean rating of 3.1.[71] DEEWR also regularly visits sites to perform compliance audits. As part of this process 41 CRS Australia sites were visited in 2009.

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[71] Commencing in August 2011, new star ratings will be publicly released by DEEWR on a six-monthly basis.

4. Client Feedback Including Complaints

This chapter examines CRS Australia's approach to seeking and capturing client feedback and complaints. It also examines how CRS Australia uses client feedback to identify business risks and improve service delivery.

Introduction

4.1   As an integral part of the Quality Strategy for Disability Employment and Rehabilitation Services, disability services providers are required to have an internal feedback process, including complaints, so that clients can make and have resolved any complaints or disputes they might have regarding the agency or the service. Strong and impartial client feedback mechanisms also provide checks and balances within the service delivery environment and opportunities for developing service excellence.

4.2   For client feedback to be effective, CRS Australia needs to have an appropriate:

- method for obtaining client feedback; and

- system for recording and analysing client feedback.

Obtaining client feedback

4.3   CRS Australia uses a range of methods to obtain feedback, including:

- end of program feedback;

- three month feedback;

- CRS Australia's website (through the 'contact us' form); and

- externally conducted surveys.

End of program feedback

4.4   As part of Quest for quality (refer Chapter 3), feedback is sought from clients to complement CRS Australia's internal assessment of its service delivery. Ensuring that an end of program feedback form is provided to clients for voluntary completion is a compulsory component of the quality management process at service delivery sites.

4.5 End of program feedback is sought through a paper form, also available in languages other than English, which is posted or handed to the client at the conclusion of the program for completion and return. The current form has been in use since July 2008 and features 18 questions. The first 11 questions require clients to circle a rating that best describes their opinion on services received, as illustrated in Figure 4.1.

Figure 4.1

End of program rating scale
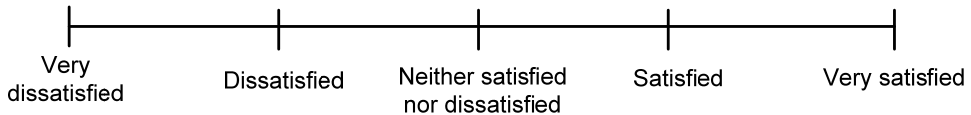
Source: ANAO, based on CRS Australia information.

4.6 In recent years, the volume of client feedback being provided has dropped. Table 4.1 shows a decrease in the overall return rate during the period 2007–08 to 2009–10.

Table 4.1

Number of feedback returns and return rate

Financial Year	National	Return rate
2007–08	3931	15.2 per cent
2008–09	3941	13.5 per cent
2009–10	3623	12.5 per cent

Source: ANAO analysis of feedback in CRS Australia's database.

4.7 There are a number of factors that could influence the recent trend in client feedback returns, which may include:

• the number and complexity of the questions, some which are so subtly different that distinguishing between them is difficult;

• literacy levels of clients, who may have difficulty reading solely text-based forms; and

• the timing of when the feedback is sought, which is after the program ends.

4.8 An analysis of the feedback data also shows some internal inconsistencies in the responses recorded, indicating that at times clients misunderstand the rating system and provide erroneous responses. These

results are in line with comments from some administrative staff who received forms where the client had circled the wrong rating by mistake.

4.9 CRS Australia engaged a market and social research consulting firm to assist with the design of the end of program feedback questions. However, the form was not piloted with a group of clients and feedback has not been sought on its content. To help improve the completion rate and, therefore, provide CRS Australia with greater insight into clients' perceptions of customer service, CRS Australia could review its feedback form and consider:

- refocusing the number of questions;

- simplifying the wording of the questions, including using graphics to indicate the degree of satisfaction or happiness; and

- undertaking a pilot study of the feedback form with clients to gather their input.

End of program feedback results

4.10 Table 4.2 provides an overview of the national feedback, between 1 July 2008 and 30 June 2010, for a selection of the questions in the end of program feedback form.

Table 4.2

End of program feedback results, 1 July 2008—30 June 2010

Question Number	Question	Dissatisfied and very dissatisfied	Satisfied and very satisfied	No answer or Neither agree nor disagree
2	—satisfaction with support received from CRS Australia?	5 per cent	90 per cent	5 per cent
3	—satisfied with ability to understand needs?	5 per cent	87 per cent	8 per cent
7	—satisfied with ability to involve you in the planning of your program?	4 per cent	87 per cent	9 per cent
8	—level CRS Australia helped you manage your disability/injury/health condition?	4 per cent	82 per cent	14 per cent
11	—ability to assist you find a job or return to the workforce?	6 per cent	73 per cent	21 per cent

Source: ANAO analysis of CRS Australia data.

4.11 The feedback provided indicates high levels of customer satisfaction with the services they receive from CRS Australia. However, given the relatively low response rate (12.5 per cent in 2009–10) there could be elements of non-response bias in the results, which effectively skews the result to clients who were happy with the service.[72] For internal purposes, this feedback can give an indication about satisfaction with service delivery, but it is important that any conclusions drawn recognise the limitations of the data and are supported by other evidence where possible.

4.12 Where negative feedback is received, regional managers and SRCs are required to investigate the issue raised with the client if permission and contact details are provided. The guidelines on negative feedback require complaints received through the feedback process to be placed on the complaints database. Incidences of negative feedback being entered in the complaints database were not identified. The feedback database does not allow for clients' names to be recorded, and, therefore, it is impossible to reconcile complaints in the feedback database to the complaint database.

4.13 End of program feedback is designed to assess client satisfaction levels so that a benchmark can be ascertained for Quest for quality. However, as the client is no longer receiving services when the feedback is sought, remedial action in response to complaints would generally be too late. This highlights the importance of also having feedback mechanisms available to clients while they are receiving services, to complement the end of program feedback.

Three month feedback form

4.14 CRS Australia's feedback mechanisms include an optional three month feedback form, which can be used by sites three months after a client begins receiving services.[73] The use of the three month feedback form varies across the network. For example, three sites in one state have been using the three month feedback process on a regular basis since 2007, while another two sites in another state had sent out a three month feedback form in May 2010 to all

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[72] Some people are more (or less) likely to respond to surveys and this may induce bias in surveys. This can be more pronounced when there is a low response rate to surveys. National Statistical Service, [Internet] *Statistical Clearing House Seminar Series, Drawing Conclusion from Surveys with a Low Response Rate*, NSS, 2004, available from <http://www.nss.gov.au/nss/home.nsf/0/61743489d51ade77ca2571ab002436be/$FILE/Low%20response%20rates%20-%2026%20November%202004.pdf> [accessed on 13 September 2010].

[73] The three month feedback process is optional due to the existing administrative demands on staff.

current clients. This contrasts with other sites that were, in some cases, unaware of the feedback option or were aware of the feedback form but chose not to use it.

4.15 The three month feedback form provides an option for sites to complement the information gained through the end of program feedback, with the experiences of clients while they are receiving services. It also allows sites to identify areas where services can be improved and take more immediate steps to rectify any issues raised. However, as the use of three month feedback forms is low, this limits CRS Australia's ability to use the information gathered through this mechanism to improve service delivery and monitor quality.

CRS Australia's website

4.16 The Internet, through tailored websites, is emerging as a significant means for organisations to communicate with clients, potential clients and key stakeholders.[74] CRS Australia's website provides information about the organisation, its services and its locations. In recent years, CRS Australia advised that it had experienced an increase in the number of unique hits on its website[75], up from 127 721 in 2008–09 to 169 234 in 2009–10.

4.17 CRS Australia's main page does not have an immediately available or identifiable feedback menu item or a link. There is a 'contact us' link in the bottom right hand corner of the page in small print. The 'contact us' page provides an option to complete a 'contact us form' and a link with the words 'to find out more information or provide feedback.' This link opens to the 'contact us' form and a drop down box appears to classify the contact. The option to provide feedback is the second to last on the menu. The 'contact us' form serves multiple purposes, such as capturing queries from prospective employees and potential commercial clients.

4.18 By way of comparison, another agency within the Human Services portfolio, Medicare Australia, makes a feedback link available on its home

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[74] The Australian Bureau of Statistics released the result of the Internet Activity Survey, which indicated that at the end of June 2010, there were 9.6 million active Internet subscribers in Australia. Australian Bureau of Statistics, *Internet Activity* [Internet], ABS, June, 2010 available from <http://www.abs.gov.au/ausstats/abs@.nsf/mf/8153.0> [accessed on 22 February, 2011].

[75] <www.crsaustralia.gov.au>

page, which opens to a page describing four categories of feedback: customer feedback, website feedback, report fraud and contact us. The customer feedback form opens to the service charter form that allows a person to lodge a compliment, suggestion or complaint across the various schemes administered by Medicare Australia.

4.19 To improve the ease with which clients can provide feedback via the Internet, CRS Australia could examine options to improve its website. These could include locating a feedback link on the home page and also creating a form specifically tailored to client feedback.

External stakeholder surveys

4.20 External, professionally conducted client surveys offer organisations an opportunity to objectively measure client satisfaction and reduce the potential bias associated with internally conducted surveys with low response rates. Where the results of these external surveys are published, they can assist in reporting performance to key stakeholders and other interested parties.

4.21 CRS Australia commissioned externally conducted stakeholder and client surveys in 2007 and 2008.[76] An External Stakeholder Review undertaken in 2008 (published in 2009) targeted commercial clients and key stakeholders, rather than DEEWR job seeker clients. The 2007 survey, conducted prior to the Disability Employment Services market sharing arrangements, included DEEWR-funded job seekers. The overall satisfaction rating assessed by the survey was an index rating of 79.2, which is at the high end of the moderate satisfaction scale. There was a lower level of agreement, index of 69.4, with the view that clients were confident that CRS Australia could find them a job.[77]

4.22 Recognising that there is a cost involved, CRS Australia could investigate options to develop an externally conducted survey that includes a focus on job seekers. If held on a regular basis, and with the use of common questions, the survey would allow a baseline to be established and subsequent

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[76] CRS Australia's Service Charter states that: 'it conducts annual satisfaction surveys to seek feedback about our performance and report against the standards outlined in this service charter.' Internal guidelines indicate that the national customer and client satisfaction surveys are conducted by an external research agency every two years.

[77] This index is calculated using Strongly agree = 100, Agree = 75, Neither = 50, Disagree = 25, Strongly disagree = 0. As such the scores are averaged to 80 – 100 = High level of agreement, 70 – 79 = Moderate level of agreement, 60 – 69 = Low level of agreement, 50 – 59 = Very low level of agreement, < 50 = Disagreement.

trend data to be gathered in order to assess clients' views on the services they receive.

4.23 Obtaining reliable information on performance through this method would assist in validating internal analysis from the various other feedback mechanisms. Also, given the change in market share arrangements, such a survey could provide valuable insights into CRS Australia's performance in an increasingly competitive market.

Recording and analysing client feedback

4.24 CRS Australia captures feedback to determine a measure of client satisfaction as part of quality reporting and to improve service delivery. CRS Australia's Quest database is set up to capture the feedback from the end of program and three month feedback forms.[78]

4.25 High-level analysis of information in the Quest database is undertaken by the Service Delivery Network Support team and then reported to the executive through the annual quality report. Leading indicators analysed and reported on are the percentage of respondents who said they were either very satisfied or satisfied with CRS Australia's service delivery. Responses to particular questions and the respective satisfaction rating by division are highlighted in the annual report. The report allows the executive to target areas for improvement and provides a level of insight into the quality of service delivery.

4.26 Comments on the client feedback forms can often give greater insight to the service delivery experience of the respondent. Although it is possible to produce a report with all the comments fields from the database, it is not routinely done. As the comments are placed in free-text fields within the database they are not easy to assess, particularly with more than 3000 entries annually.[79] A level of national reporting that includes analysis of client comments could further improve the quality of information provided to the executive about CRS Australia's service delivery, particularly the identification of any systemic issues.

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[78] Other feedback, such as verbal feedback obtained during face-to-face contact, ad hoc phone surveys and focus groups, is not able to be captured in the same way.

[79] The feedback database does not have a selection of categories to facilitate the sorting and analysis of complaints.

Conclusion

4.27   CRS Australia draws on a suite of feedback mechanisms to obtain clients' views on service delivery. A challenge for CRS Australia is to coordinate these mechanisms to deliver information to assess performance and improve service delivery outcomes for clients.

4.28   The primary means of gathering client feedback is through the end of program feedback form. While results in recent years have shown a high rate of client satisfaction, the conclusions that can be drawn are limited by the low response rate. A low response rate can introduce non-response bias and positively skew the results on performance and the achievement of benchmarks.

4.29   Obtaining feedback in the course of providing services (namely three month feedback form) is optional and not commonly used by sites. This limits the ability of CRS Australia to address service delivery issues as they arise. Ensuring feedback options are available to clients while they are receiving services would allow service delivery issues to be addressed promptly.

4.30   Other opportunities for improving client feedback mechanisms exist in relation to:

- undertaking research on the effectiveness of feedback forms from the client's perspective and, where appropriate, updating the forms; and

- making the feedback options available to clients on the CRS Australia website clearer, and including a dedicated client feedback (and complaints) form.

4.31   Further, to provide a more objective assessment of performance and mitigate the risks of misstatement from the end of program feedback form due to the low response rate, CRS Australia could examine adopting a regular externally conducted survey that focuses on feedback from clients who have exited the program.

4.32   High-level analysis of client feedback data is undertaken by the Service Delivery Network Support team and reported to the executive. This reporting is limited to analysis of quantitative responses as the information gathered through free-text client comments is not systematically reviewed. This presents the risk that customer insights accompanying quantitative responses are missed or trends that can be recognised are not brought to the executive's attention.

Recommendation No.1

4.33   To improve service delivery for clients, and also identify broader issues or examples of good practice, the ANAO recommends that CRS Australia review the existing client feedback mechanisms and examine options to:

(a)   routinely seek feedback from clients while they are receiving services;

(b)   conduct a regular external client survey as the principal means to assess overall client satisfaction; and

(c)   analyse comments provided by clients as part of its standard approach to reporting.

Agency response

4.34   Agreed. CRS Australia agrees that seeking client feedback during a program is valuable. CRS Australia will therefore explore and implement strategies to ensure feedback is received from clients while receiving services.

CRS Australia's complaints handling process

4.35   To meet the requirements of the Disability Services Standards and the DEEWR MOU, CRS Australia is required to have an internal complaints handling process. Clients may also raise a complaint and seek a resolution through various external avenues such as the DEEWR Customer Service Line, the Complaints Resolution and Referral Services (CRRS) and the Commonwealth Ombudsman.

Complaints handling process

4.36   CRS Australia's complaints handling process features: a definition of a complaint published on CRSnet—an expression of dissatisfaction about a CRS Australia service or decision where a response and action is required; a documented complaints handling process (refer Appendix 3); targeted training for regional managers and SRCs; and six-month reporting to the executive on the numbers, trends and categories of complaints.

4.37   CRS Australia has guidelines on complaints handling, including instructions on what information to record on its complaints database. CRS Australia classifies its complaints in accordance with a tiered system for reporting purposes, and to denote that a complaint has been escalated to the next level (refer Appendix 4). Tier one complaints are those received and dealt with at the local service delivery site level. Tier two complaints are those that have been received at the divisional manager level or have been referred from

a tier one level, that is, escalated. Tier three complaints are those received from an external body or have been escalated from a tier two. Tier three complaints are the highest step in the internal resolution process. At any time a client may refer their complaint to an external complaints process.

4.38   In addition to the tiered system, to help with analysis and the identification of systemic issues, CRS Australia assigns categories and sub-categories to complaints when recording them in the complaint database (refer Appendix 5). Figure 4.3 shows how the classification and escalation system operates.

Figure 4.2

CRS Australia's complaint classification process
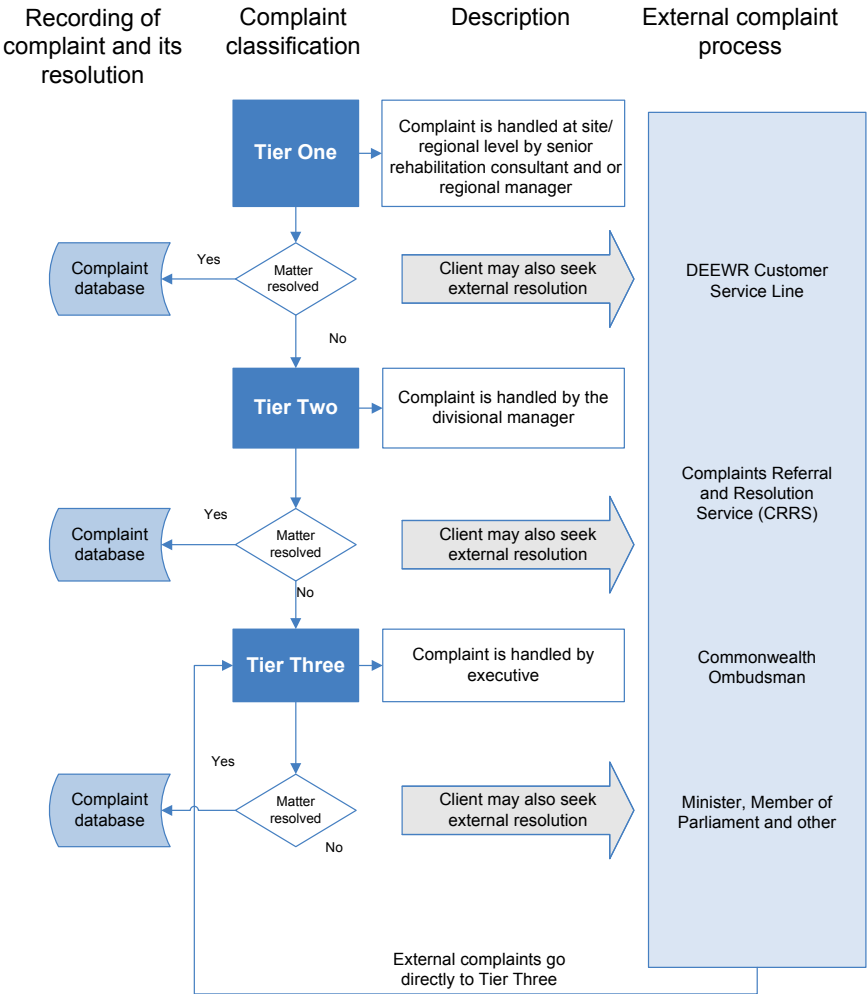
Source: ANAO analysis.

4.39 In April 2009, the Commonwealth Ombudsman published a new edition of the *Better Practice Guide to Complaint Handling* (the Better Practice Guide) [80]. Following this, CRS Australia modified its complaints management process in December 2009 to incorporate the principles contained in the new Better Practice Guide. CRS Australia also made changes to its CRSnet guidelines, including:

- rewording resolution procedures and flowchart (refer Appendix 3);

- providing staff with an additional form on five fundamental principles to effectively manage a complaint, which was drawn from the Better Practice Guide; and

- providing clients with Internet links from the CRS Australia website to the Better Practice Guide and additional resources.

Complaint numbers

4.40 The number of complaints received by CRS Australia as recorded on their complaints database is shown in Table 4.3.

Table 4.3

Number of complaints per financial year by tier

Year	Tier One	Tier Two	Tier Three	Total
2007–08	156	15	28	199
2008–09	130	13	36	179
2009–10	219	12	64	295
Total	505	40	128	673

Source: CRS Australia.

4.41 In 2009–10, the number of complaints received at all levels was relatively low, that is, one per cent of clients exiting the program. When compared to the total number of clients across the year, including clients already with CRS Australia and new commencements, complaints were received from 0.05 per cent of clients.

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[80]   Commonwealth Ombudsman, *Better Practice Guide to Complaint Handling*, Canberra, April 2009.

Recognition of complaints

4.42 The Commonwealth's Ombudsman's Better Practice Guide refers to the culture of an organisation with regard to complaints, such that an agency must:

> Value complaints and recognise that effective complaint handling will benefit its reputation and administration. Complaints can:
>
> • Highlight weakness in an agency's programs, policies and service delivery; and
>
> • Stimulate an agency to improve.[81]

4.43 To establish such a culture, a common understanding of what constitutes a complaint is required among service delivery staff. It also requires an acceptance and encouragement of complaints to improve service delivery and treating clients' concerns with respect, fairness and transparency.

4.44 Recognition of complaints is affected by:

• the ease with which a client can make a complaint;

• whether complaints are recognised and acknowledged internally; and

• the recording of complaints.

Ease with which a client can make a complaint

Initial interview

4.45 Clients are given a range of information when they attend their initial interview, including handouts on the external complaint options available to them, which is a requirement of the DEEWR MOU. Staff also describe the internal complaints process to the client in the face-to-face interview. To complement discussions at the initial interview about the internal complaints process, posters describing the CRS Australia complaints and feedback processes are provided to sites for display.

4.46 CRS Australia publishes a 'We're Listening' handout, which provides a clear and easy to understand message about the internal complaints process. CRS Australia, however, does not specify that the 'We're Listening' handout should be included in the initial information packs given to clients, due to the

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[81] ibid., p. 2.

amount of documentation provided to clients at that time. As a result, only a small number of sites regularly provide clients at the initial interview with the handout.

4.47 To supplement discussions when clients attend their first appointment, and help promote client awareness of CRS Australia's internal complaints process, CRS Australia could consider making the 'We're Listening' handout a standard part of the introductory package of information provided to clients.

Website

4.48 The Ombudsman's Better Practice Guide states that information about complaints 'should be readily accessible from the home page of the website, it should not be buried under several levels of navigation menus.'[82] There is no specific complaints form on the CRS Australia website. The 'contact us' form serves for client feedback, which can include complaints, however, this is not explicitly stated. General complaints information on the website refers clients wanting to make a complaint to the local level in the first instance.

4.49 In the 2008 accreditation audit, a suggestion for improvement was made regarding the addition of a specific complaints section on the CRS Australia website. The auditors observed that the 'contact us' option may cause confusion for clients. Although consideration was given to this suggestion, CRS Australia did not change the website as it decided that the web pathway was clear and did not need to be made more visible.

Barriers to making a complaint

4.50 Sometimes a client may face a barrier(s) when considering whether to make a complaint. These barriers include, 'lack of time, a perception that complaining will be too much trouble, a perception that the agency will not act on the complaint, fear that the agency will send complainants on a 'wild goose chase', and 'complaint fatigue'.[83] These barriers are in addition to the challenges a client might already experience in raising a complaint due to the vulnerability of their circumstances and the nature of their disability.

4.51 To help address potential barriers to a client making a complaint directly with CRS Australia, alternative methods, such an easily accessible

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[82] ibid., p.12.

[83] ibid., pp. 13–14.

online complaints form or a central complaints email address for lodging a complaint, should be available.

Complaints are recognised and acknowledged

4.52   CRS Australia has determined a definition of a complaint, documented its corporate complaints management process and has a database to collect complaints information. Service delivery staff interviewed during the audit expressed different views about how they defined a complaint, indicating that despite CRS Australia's guidance on the nature of what constitutes a complaint, there is still some variance in interpretation.

4.53   This was also evident in a small number of case files where the case notes indicated that the client had 'expressed dissatisfaction' with the service. In these files there was no indication that the client's concerns had been addressed or that the complaint had been recorded on the complaint database. At one site, the SRC advised that if the client was not happy with the solution provided, they were invited to complete a complaint form and lodge a formal complaint. According to the CRS Australia guidelines, there is no requirement to put a complaint in writing nor is there a distinction between an informal and formal complaint. This particular site has recorded no complaints for the last three financial years, which could indicate that this practice has deterred clients from raising a complaint.

Recording complaints

4.54   An effective complaints management system assists an organisation to monitor service delivery and complaints. It also provides information on areas where an organisation can improve. For CRS Australia, this means being able to rely on its complaints database to provide for effective reporting and analysis.

4.55   For the sites visited as part of the audit, 11 out of 20 sites had no recorded complaints for the past three years (2007–08, 2008–09 and 2009–10). Despite the database not containing any complaints for these sites, there were still indications that complaints had been received. These included evidence that some regional managers did not record complaints in the database, and that some complaints raised by the DEEWR customer service line also went unrecorded.

4.56   Complaints not being recorded in the database can occur for a number of reasons, including inadequate training, a lack of awareness about

recognising a complaint and/or reluctance to document that a complaint has been made.

4.57 Currently, complaints management training is provided to staff in those positions responsible for managing complaints. However, staff at all levels of the organisation can receive client complaints and having a greater organisational awareness of the process would assist with appropriately recognising, capturing and handling complaints. To that end, CRS Australia could improve its complaints management processes by developing and implementing complaints management training for all service delivery staff. This could be through a specific training module that is supported by the inclusion of information on CRS Australia's complaints management system (including the definition of a complaint) in its standard e-induction package.

Investigation of complaints

4.58 To ensure that complaints are dealt with fairly, an investigation may be required to examine the issue. The Ombudsman's Better Practice Guide discusses how there is often a power imbalance between the person making the complaint and the agency they are complaining about. Staff that handle complaints 'should not be defensive about their agency or its staff. Nor should a complainant be obliged to prove they are right and the agency is wrong'. [84]

4.59 Generally, when a complaint is referred to the SRC or the regional manager, the first step involves contacting the client making the complaint. This contact can be face-to-face, by telephone and, at times, via email, depending on how the complaint was referred to them. The next step involves speaking to the relevant staff member to gather their perspective. The process can also involve looking at the case file, particularly the case notes.

4.60 CRS Australia has a guideline on investigating complaints, which uses the terms 'straightforward' and 'complex' complaints but does not define them. Given that the process and requirements are different for the two types of complaints, not defining their characteristics can make it difficult for staff to know what actions are appropriate. This is particularly the case for documenting the process and substance of investigations, which also has a

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[84] Commonwealth Ombudsman, *Better Practice Guide to Complaint Handling*, Canberra, April 2009, p. 9.

potential impact if a client takes a complaint to an external body and a record of the internal investigation is required.

Analysis of complaints

4.61 Complaints data is a source of information about how services are delivered. High-level analysis can provide the executive with information on the number and type of complaints. Detailed analysis further enables the causes of valid complaints to be assessed and addressed so that actions can be taken to improve service delivery.

4.62 Service Delivery Network Support reports every six months to the executive on complaints and also makes reports available to staff via CRSnet. Analysis includes the number of complaints (by tier), national and divisional trends and an assessment of the categories of complaints. There is also discussion on complaints that were escalated during the period with some details about the substance of the complaint. Reporting, however, does not routinely include information on the causes of complaints and how they were addressed. This information is important, particularly at the national level, so that issues that potentially have wider ramifications for the service delivery network are identified and actions can be taken.

4.63 The main method used to undertake analysis at the corporate level is through the classification of complaints in categories and sub-categories (refer Appendix 5) and the small text fields within the database.

Communication of learnings from complaints

4.64 An effective complaints management process allows for business risks to be identified and addressed while also contributing to broader continuous improvement to enhance service delivery. One means to provide for greater learning for staff is to share the circumstances of complaints by publishing de-identified case studies in CRS Australia's e-news. CRS Australia advised that it had done this in prior years and it was considering publishing case studies again.

Complaints database

4.65 CRS Australia maintains separate databases for complaints and client feedback. This decision was primarily based on being able to keep the details of a client's complaints/issues confidential should they request a transfer to a different case manager. This would allow a client to confidently engage with the new case manager without the concern that issues they had previously raised would influence the relationship. A limitation to this approach, however, is that the information about the complaint is often recorded on a

client's hardcopy file, which is passed to a new case manager when a client is transferred.

4.66   Having two separate systems can create a barrier between client feedback and complaints data. For example, it is not possible to determine if complaints received through negative feedback have been entered on the complaints database. Further, it limits the level of analysis CRS Australia can undertake to understand clients' overall perspectives on services being provided. It would be possible to combine the client feedback and complaints databases and still achieve CRS Australia's confidentiality aims through the use of security protocols within the database to restrict access to complaints. This would allow for the common capture and recording of all forms of client feedback and assist in providing more comprehensive analysis for the executive.

4.67   A 2010 internal audit on complaints handling recommended that CRS Australia consider enhancing or replacing its complaints database, particularly in regard to the paucity of information within the database and free-text limitations at data entry. As part of these considerations, CRS Australia could explore the option of implementing one database that, with appropriate security and access controls, is able to record client feedback and complaints.

Conclusion

4.68   Clients are advised at their initial interview of the internal and external complaint avenues available to them. CRS Australia could improve the complaint and feedback mechanisms available to clients by providing the 'We're Listening' handout as part of the introductory information given to clients; and developing a complaints and feedback form for its website, with a corresponding link clearly identified on the website homepage.

4.69   CRS Australia has an established complaints management process with accompanying guidance and executive support for acknowledging and dealing with complaints. However, the internal complaints process and guidance (such as the definition of a complaint) are not commonly understood across the network. In 2009–10, CRS Australia recorded receiving 295 complaints, a relatively low level when compared to the number of clients receiving services. The limitations of the common understanding and recording of feedback would impact, however, on the reliability of this figure.

4.70   Promoting a culture where complaints are recognised and addressed is important to an organisation's reputation and its ability to identify risks and improve service delivery. A key part of building this culture is staff training.

CRS Australia encourages clients to address complaints to staff at local sites. However, not all staff at service delivery sites have received training in how to recognise, respond to and document a complaint. This training has been aimed at regional managers and SRCs. To help ensure all complaints are recognised and captured, CRS Australia could develop and implement a complaints awareness training module for all service delivery staff.

4.71 Once a complaint has been received, CRS Australia has a process for investigating the issue. CRS Australia could provide greater support to staff responsible for investigating complaints by updating the existing guidance to define the difference between 'straight forward' and 'complex' complaints, and make clearer the requirements for documenting the investigation of complaints.

4.72 CRS Australia uses its complaints database to undertake high-level analysis that is largely based on the numbers and classifications of complaints. This analysis does not generally include information on the causes of complaints and how they were resolved. A stronger link to how systemic issues with service delivery and personnel behaviour are addressed as a result of a complaint would assist to inform management of how risks are being managed and services are being improved.

4.73 CRS Australia maintains separate databases for its client feedback and complaints information. This can create a barrier to identifying complaints through the client feedback system and being able to get a complete picture of client feedback. As part of responding to the recommendations of an internal audit on complaints handling, CRS Australia could explore the costs and benefits of implementing one database. A combined system, with appropriate security protocols, could streamline the information gathered through feedback and complaints, and improve the ease with which analysis can be undertaken and management reporting produced.

Recommendation No.2

4.74 To increase staff awareness and capability to manage complaints, including capturing client complaint data, the ANAO recommends that CRS Australia develop and implement a complaints management training module that can be delivered as part of its training for all service delivery staff.

Agency response

4.75 Agreed. CRS Australia will develop and implement a complaints management training module for delivery to all service delivery staff.

5.   Planning, Performance Monitoring and Reporting

This chapter examines CRS Australia's planning and internal monitoring and reporting processes. It also outlines the external performance reporting arrangements.

Introduction

5.1   For good governance, it is important that performance information used for external reporting requirements, such as the annual report to Parliament, is consistent with, and integral to: internal planning; budgets; analysis; and other internal performance reporting.[85]

5.2   CRS Australia plans, monitors and reports on its operations through:

•   planning, including the integration of risk management;

•   internal performance monitoring and reporting; and

•   external performance reporting.

Planning

5.3   Planning assists organisations to decide how to target activities to meet key organisational goals. With its devolved management structure, CRS Australia needs to have in place planning mechanisms that allow clear messages about corporate goals and key activities to filter down to the service delivery areas. As part of these activities, integrating the risks that may prevent the attainment of goals provides for appropriate mitigation strategies to be incorporated into business plans.

5.4   CRS Australia uses business planning at all levels, from the executive to the team level. Business plans show clearly documented roles, responsibilities, activities with timeframes for completion, as well as including risk management considerations. Business plans are periodically reviewed throughout the year and are complemented by other planning activities such as regional planning days.

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[85]   ANAO Better Practice Guide, Better Practice in Annual Performance Reporting, Australian National Audit Office, April, 2004, Canberra, p. 3.

Risk management

5.5   CRS Australia has a risk committee that oversights risk management and coordinates internal audit and related functions. CRS Australia maintains a risk management plan that is updated as required. Business continuity planning is also encompassed in the risk management function.

5.6   CRS Australia has four separate risk registers: strategic, fraud, security and operational, which are regularly reviewed and revised as appropriate. While Information Technology security controls detailed in the security risk register addressed technical and physical security concerns, other Information Technology-specific risks had not been detailed in any of the existing registers.

Internal monitoring and reporting

5.7   It is important for a service delivery organisation to monitor the quality of the services it delivers and assess whether it is meeting key performance indicators, including financial benchmarks. Performance reports provide a foundation for planning, budgeting and monitoring. Without performance reports, 'planners would have to rely on intuition and opinions, which are likely to be less precise and more subjective than carefully designed and balanced reporting.'[86]

5.8   CRS Australia has a devolved service delivery network of 185 sites in 70 regions that report to five division managers. Division managers meet with the Strategic Business Group every six to eight weeks throughout the year.[87] Figure 5.1 depicts the performance reporting framework within CRS Australia.

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[86]   ibid, p. 4.

[87]   The Strategic Business Group includes the three senior executives and the national managers of other functions within CRS Australia.

Figure 5.1

Internal performance reporting framework
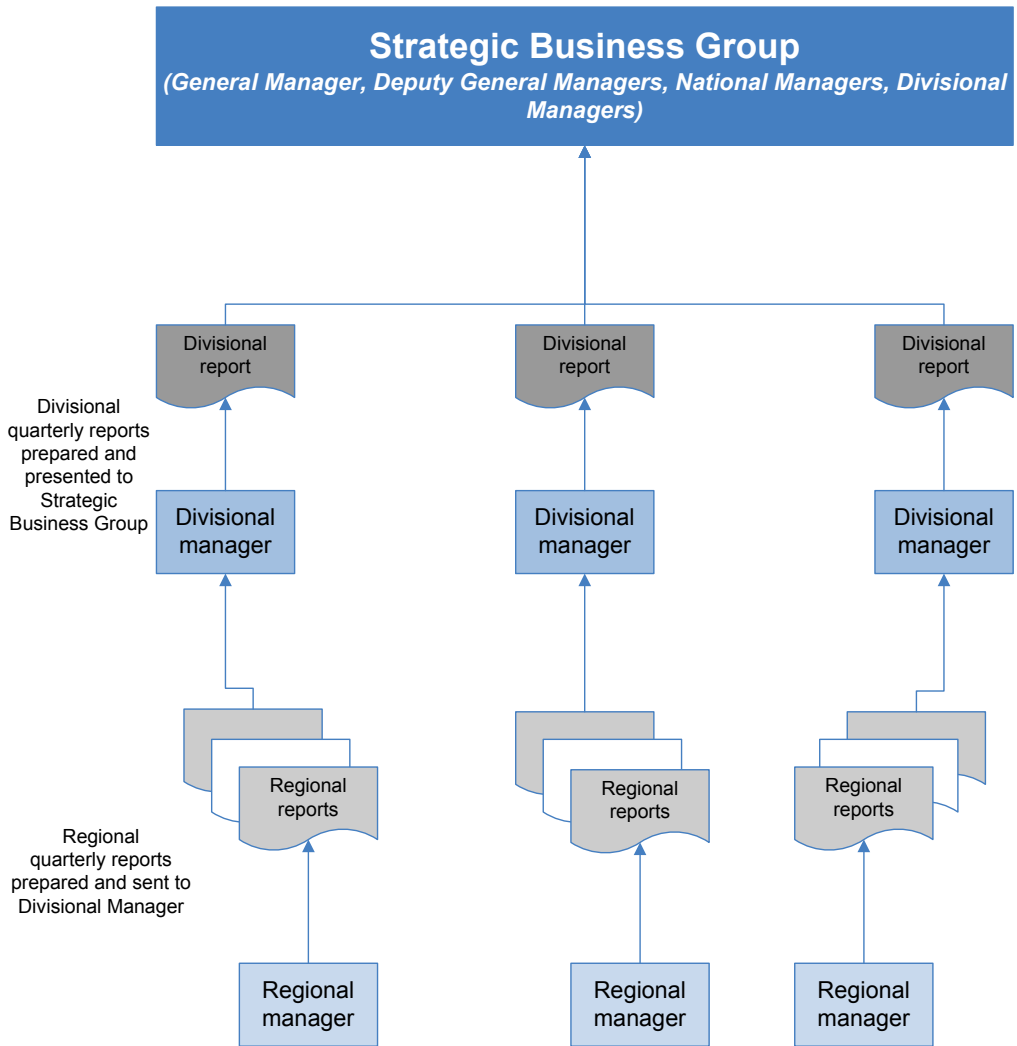
Source: ANAO analysis.

5.9 Quarterly reporting to the Strategic Business Group is completed by all divisions, as well as by the managers of the national functions such as finance, learning and development, property and quality. In addition, the Strategic Business Group receives ad hoc monthly exception reports and miscellaneous topic-related reports and papers on administrative matters. The reporting at the six-month and end of year periods include major reviews against milestones and budgets as set out in the respective business plans.

5.10 To instil a performance culture throughout the organisation, all staff should be aware of the outcomes they are expected to contribute towards, and have the motivation and incentive to do so within a framework of public sector values and ethics.[88] CRS Australia endorses an approach to performance management that has a focus on:

- financial viability;

- service delivery; and

- quality.

Financial viability

5.11 The focus on financial viability is present in all aspects of CRS Australia's business, including the internal management reporting. This focus is largely due to CRS Australia not being supplemented by budget funding and having to support its operations through its service fees. The focus on financial performance is understood at all levels of the CRS Australia network. For example, the main communication tool on CRSnet includes a 'dashboard' graphic display that shows CRS Australia's overall financial performance and allows for information at the site level to be obtained. Figure 5.2 provides a snapshot of the CRSnet dashboard graphic display, which includes the specific benchmark for each indicator.

Figure 5.2

An example of the 'dashboard' graphic on CRSnet

National - YTD June 2010
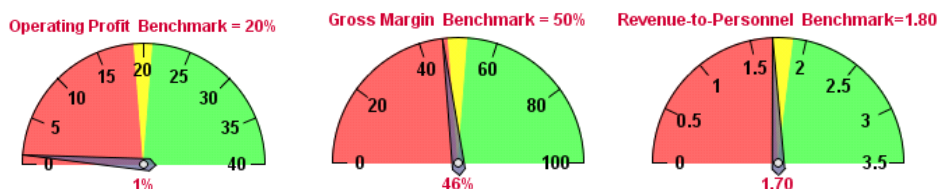
Source: CRS Australia.

5.12 The focus on the bottom line can also be seen in the CRS Australia Collective Agreement 2008–2011, which states:

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[88] ANAO Better Practice Guide, Better Practice in Annual Performance Reporting, Australian National Audit Office, April, 2004, p. 4.

CRS expects all employees to work with their managers to implement measures which will ensure the achievement of the revenue to salary benchmark of 1.7:1 and maintaining corporate costs at or below 13% of national revenue.[89]

5.13 There is consistent reporting across the organisation on financial performance against the budget and financial targets. The dashboard shown in Figure 5.2 displays at a glance site, region, division or organisation wide performance against key benchmarks. CRS Australia advised that these targets are set for regions and sites so that sufficient revenue can be generated to cover the costs of the national functions. Overall, CRS Australia reported small consecutive operating profits during the period 2006–07 to 2009–10.

Service delivery

5.14 Service delivery key performance indicators are also closely monitored and feature in both regional and divisional reports. In these reports, there is a particular emphasis on DEEWR case management work, which generated 78 per cent of CRS Australia's total revenue in 2009–10. Reporting of all DEEWR milestones and service claims includes information on the actual performance against target for commencements, job placements and 13 and 26 week employment outcomes.

5.15 Each site and region sets targets for the number of commencements of DEEWR clients. At a basic level, these targets underpin the budget estimates for each site, as a commencement links to an estimated revenue stream. All divisions and regions then report on their DEEWR milestones using the actual results against the targets. Where possible, CRS Australia advised that it uses DEEWR information to augment its internal reports.

5.16 The focus on these key milestones links directly to how CRS Australia is paid for the services it delivers. With the introduction of the new DEEWR MOU on 1 March 2010, the payment structure is more strongly linked to outcomes, particularly the 13 and 26 week employment outcomes. This means that a drop in commencements can lead to a drop in income in the following year.

5.17 The achievement of employment milestones is also included in the CRS Australia Collective Agreement, which states:

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[89]   Internal document, *CRS Australia Collective Agreement 2008–2011*, p. 10.

> CRS expects all employees to make an ongoing commitment to the achievement of an increase in the placement rate of job seekers, which leads to 13 and 26 week outcomes…[90]

Quality

5.18　CRS Australia has a number of ways to assess the quality of the services it delivers. At an internal level, quality is assessed through the Quest for quality self-assessments, while externally, CRS Australia relies on the accreditation audits, DEEWR compliance audits and client feedback. Together, these mechanisms provide useful insights to service delivery quality.

5.19　Generally, it is the National Service Delivery Forum[91], rather than the Strategic Business Group, that reviews the information gained through these processes. While periodic reports containing quality aspects are presented to the Strategic Business Group (including complaints information, reports on internal reviews and annual quality reports), the quality of service delivery does not have the same focus within the group as financial viability and service delivery achievements.

5.20　An analysis of a sample of divisional and regional quarterly reports from 2009–10 revealed a variance in the information provided about how service delivery quality was monitored and reported to the Strategic Business Group.[92] The level of information on quality varied between divisional and regional reports from a brief statement on Quest activities completed to detailed information on performance against the Quest benchmarks. Some reports also included information on other quality activities being undertaken in the region/division.

5.21　A recommendation contained in an internal annual quality report in 2009 required regional managers to report on the implementation of quality improvement activities in their quarterly reports. However, the manner and form of the reporting was not outlined in the recommendation. Responsibility for implementing this reporting was accorded to the divisional managers as these reports are received and reviewed by them.

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[90]　ibid., p. 10.

[91]　The National Service Delivery Forum is where service delivery and quality are specifically discussed.

[92]　The information in these reports was not validated.

5.22   Currently, there are no set quality indicators for regional/division managers to report against and, as a result, not all reports contain information on quality. CRS Australia could provide for a better balance in its internal reporting stream by including reporting against specified quality indicators and information. Establishing key performance indicators related to the quality of services delivered and measuring them on a consistent basis would assist CRS Australia with its goal of becoming 'the outstanding provider of disability employment, assessment and injury management services in Australia.'[93]

5.23   CRS Australia advised that it is considering introducing quality indicators to its dashboard display. Through the Quest team self-assessments (refer Chapter 3), CRS Australia sets benchmarks for each of the KPIs associated with the Disability Services Standards. This information provides one way in which the quality of service delivery could be monitored. CRS Australia could also consider other quality measures (with benchmarks) to augment its quality reporting from regions through the divisions, including the:

- number of case file reviews undertaken by SRCs against a target number of reviews (with relevant information on the outcomes of the reviews);

- number of service delivery staff completing complaints awareness training; and

- number and nature of client feedback, including complaints.

5.24   Reporting against a range of quality key performance indicators from the regions would allow CRS Australia to focus on quality initiatives and monitor their implementation and results.

Reporting within Department of Human Services (DHS)

5.25   As a division of DHS, CRS Australia reports monthly to the DHS Management Board on four Key Result Areas (KRAs) as shown in Table 5.1.

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[93]   Department of Human Services, *Forward to 2012—CRS Australia Strategic Plan 2009-2012*, DHS, Canberra, 2009, p. 5.

Table 5.1

Key Result Areas for CRS Australia reporting within DHS

KRA	Sample performance information
Maximise workforce participation	CRS Australia reports on the number of clients commencing in the program, the number of clients securing job placements and those achieving 13 and 26 week employment outcomes.
Build leadership, capability and safe workplaces	CRS Australia's reporting includes how much of its budget is allocated to learning and development, and staff turnover and unplanned leave levels.
Deliver effective, competitive and innovative services	CRS Australia focuses its reporting on its revenue, projected surplus, and property costs as a percentage of staff direct salaries.
Influence the disability employment and social inclusion agenda	CRS Australia's reporting relates to input into policy development and opportunities to influence employer and community attitudes to increase social inclusion and early intervention for people with disability. CRS Australia reports against this KRA when appropriate.[94]

Source: ANAO analysis of CRS Australia information.

5.26   Reporting within DHS is consistent with the types and content of reports used by CRS Australia in monitoring and reporting its performance. External performance information supplied by DEEWR is often used to verify internally generated information. The internal monthly reporting allows the DHS Management Board to track CRS Australia's performance against a set of targets and to be alert to areas where issues are arising and take action where necessary.

External reporting

Annual report to Parliament

5.27   As a division of DHS, CRS Australia's key performance indicators are set out in the Human Services Portfolio Budget Statements and performance against these indicators is included in the DHS Annual Report. Readers of annual reports need to be assured that the quality and reliability of information in annual reports is adequate.[95] It is also useful to be able to track the performance of an agency over time. The performance information reported in the DHS Annual Report for the period 2006–07 to 2009–10 is shown in Table 5.2.

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[94]   As CRS Australia is required to report monthly, activities against this KRA may not have taken place in the respective period.

[95]   ANAO Better Practice Guide, Better Practice in Annual Performance Reporting, Australian National Audit Office, April, 2004, p. 27.

Table 5.2

CRS Australia's annual performance information for 2006–07 to 2009–10

Performance Measure	2006–07	2007–08	2008–09	2009–10
Quality − Maintain accreditation	Certified	Certified	Certified	Certified
Quantity − Number of new clients − Number of clients achieving durable employment outcomes[96]	32 445 8312	24 530 8269	Not reported in this period	Not reported in this period
Effectiveness and efficiency − Proportion of clients achieving durable employment outcomes[97] − Surplus achieved − All other service performance targets met[98]	33 per cent $11.5 million All achieved	Not reported in this period	30.4 per cent *(reported under quantity)* $5.2 million All achieved	Not reported in this period
New indicator for performance − at or above market average for clients who remain in employment for 13 weeks				70 per cent
Cost of operations	Price of outputs $185	Price of outputs $178 million	Price of outputs $182 million	Not reported in this period

Source: ANAO analysis of Department of Human Services annual reports (2006–07, 2007–08 and 2008-09).

5.28   The key performance indicators published in the DHS Annual Report have changed over time making it difficult for stakeholders to assess CRS Australia's performance across years. For example, the change in performance to 'at or above the market average' relates to clients who have been placed in employment and remained in that employment for 13 weeks (70 per cent). The figure reported is based on DEEWR performance data and calculated by CRS Australia. As a result this new performance indicator is not comparable to the

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[96]   Durable employment outcomes is defined as 13 weeks of continuous employment.

[97]   The employment benchmarks used to assess this performance measure changed from a minimum of 8 hours per week in 2006–07 to variable benchmarks based on individually assessed work capacity from 1 July 2007 onwards.

[98]   Performance target met included individual performance under commercial contracts and other fee for service arrangements.

previous indicator, which was calculated by dividing the number of clients in jobs for 13 weeks by the number of clients exiting the program (30 per cent).

5.29 CRS Australia advised that it aligned its reporting with DEEWR's annual reporting regime.[99] The new indicator is consistent with the way DEEWR reports on the Disability Management Services in its annual report and is also supported by performance information supplied to CRS Australia by DEEWR. However, the changes to the indicators mean that a comparison of performance across years is difficult.

Other performance measures and options for performance reporting

5.30 In order for CRS Australia to present comparable performance information that provides stakeholders with insights on the impact of services delivered and their quality, there are a number of options available including reporting information on employment outcomes and customer satisfaction.

Employment outcomes

5.31 CRS Australia regularly monitors a range of key performance information as part of its internal reporting. In particular, it budgets and reports on: commencements, job placements and 13 and 26 weeks employment outcomes. This information can provide an indication of CRS Australia's performance that can be compared over time. Table 5.3 shows the results in these areas and the client outcomes CRS Australia is achieving across 2006–07 to 2009–10.

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[99] DEEWR reported the proportion of job seekers in Vocational Rehabilitation Services (now Disability Management Services), in jobs, who go on to achieve a 13 week employment outcome. The market average target was 70 per cent. Department of Employment, Education and Workplace Relations, *Annual Report 2008–09*, DEEWR, Canberra, 2009, p. 150.

Table 5.3

Performance of key outcomes

Financial Year	Commencements*	Job placements	13 week outcome	26 week outcome
2006–07	32 445	11 759	8312	7377
2007–08	24 530	12 483	8269	7138
2008–09	27 593	10 562	7229	6603
2009–10	26 278	11 859	7527	5851

Source: ANAO, based on CRS Australia information.

*Note: As Disability Management programs run for up to 78 weeks, there are timing differences that affect the job placement results from year to year.

5.32   There are two main indicators of employment, 13 weeks (durable) and 26 weeks (sustained) outcomes. As such, reporting on performance against these indicators could provide for a more consistent and complete picture on CRS Australia's performance in any given year and over time.

Customer satisfaction

5.33   In recent years, CRS Australia's goal of exceeding customer expectations related to DEEWR and other commercial clients rather than to job seekers. However, the majority of CRS Australia's clients are DEEWR job seekers. To complement existing reporting with regard to exceeding the customer's expectations, information on client satisfaction levels could be used. CRS Australia could use its externally conducted client satisfaction surveys of DEEWR job seekers to assist it to develop and report on a key performance indicator for client satisfaction (refer Chapter 4, paragraphs 4.20-4.23 for further information on client satisfaction surveys).

Conclusion

5.34   CRS Australia's planning and monitoring framework encompasses all levels of the operations. Business plans have clear descriptions of roles, targets, activities and measures to be reported against. Risk management is also included in the planning framework and risk registers and risk management plans are updated as appropriate.

5.35   Overall, CRS Australia has a robust internal reporting framework and adequate level of detail in its reporting, particularly on the achievement of financial and service delivery targets. To balance the weighting toward financial and service delivery milestone monitoring, CRS Australia could

investigate options to include a greater focus on quality in its regional and divisional manager reporting stream.

5.36   As a division in DHS, CRS Australia provides monthly reports to the DHS Management Board. This reporting is based on four key results areas and shows that a broad range of indicators are used to track performance in service delivery, personnel, finance and quality accreditation.

5.37   The DHS annual report to Parliament includes CRS Australia's performance reporting. The key performance indicators used by CRS Australia have changed over time, making an assessment of performance across years difficult. In order to provide a more complete assessment of CRS Australia's performance to stakeholders, consideration should be given to establishing a consistent set of key performance indicators that provide information on both overall performance outcomes and the quality of services being delivered.

Recommendation No.3

5.38   To improve annual public reporting on outcomes, the ANAO recommends that CRS Australia establish and report on a set of consistent key performance indicators that could be drawn from information routinely captured, such as employment outcomes (13 and 26 weeks) and job seeker satisfaction.

Agency response

5.39   Agreed. Noting that as CRS Australia delivers Disability Management Services under contract to the Department of Education, Employment and Workplace Relations (DEEWR), any performance indicators are subject to broader program changes, publicly reported program key performance indicators and data availability established by DEEWR. The fact that CRS Australia operates under a competitive performance framework in direct competition with 65 non-government providers also impacts on the presentation of data.

Steve Chapman   Canberra ACT

Acting Auditor-General   14 April 2011

Appendices

Appendix 1: CRS Australia's main services

Table A 1

CRS Australia's main services

Service	Description	Percentage of Revenue
Disability Management Services on behalf of DEEWR	Case management of clients to address barriers to gaining employment, including vocational rehabilitation and job-seeking assistance.	78 per cent
Job Capacity Assessments on behalf of DEEWR	Job Capacity Assessments are a tool used to assess a job seeker's capacity for work and to identify areas where existing barriers to gaining employment can be overcome. A Job Capacity Assessment also identifies the current and future work capacity, that is, the number of hours a job seeker has to work to reach their benchmark. Centrelink uses Job Capacity Assessments to refer job seekers to Job Services Australia or to Disability Employment Services.	7.4 per cent
Job Capacity Account Services on behalf of DEEWR	Job Capacity Account Services are a suite of short term interventions to which Job Capacity Assessors can refer eligible individuals for assistance to overcome psychological, physical, and social barriers to employment. These services are provided by allied health providers and are paid for by DEEWR. These services are for clients who do not need a vocational rehabilitation program.	1.4 per cent
Private sector work for a range of employers and insurers	Work place assessments, injury prevention services and return to work programs for injured workers or workers with a disability.	13 per cent
Business Wage Assessments on behalf of the Department of Families, Housing, Community Services and Indigenous Affairs (FaHCSIA)	CRS Australia is contracted to conduct Business Wage Assessments for disabled employees of Australian Business Services (supported employment) to determine the proportion of the award wage they are to be paid for work undertaken.	0.2 per cent

Source: ANAO, based on CRS Australia information.

Appendix 2: CRS Australia's staff classifications, roles and qualifications

Table A 2

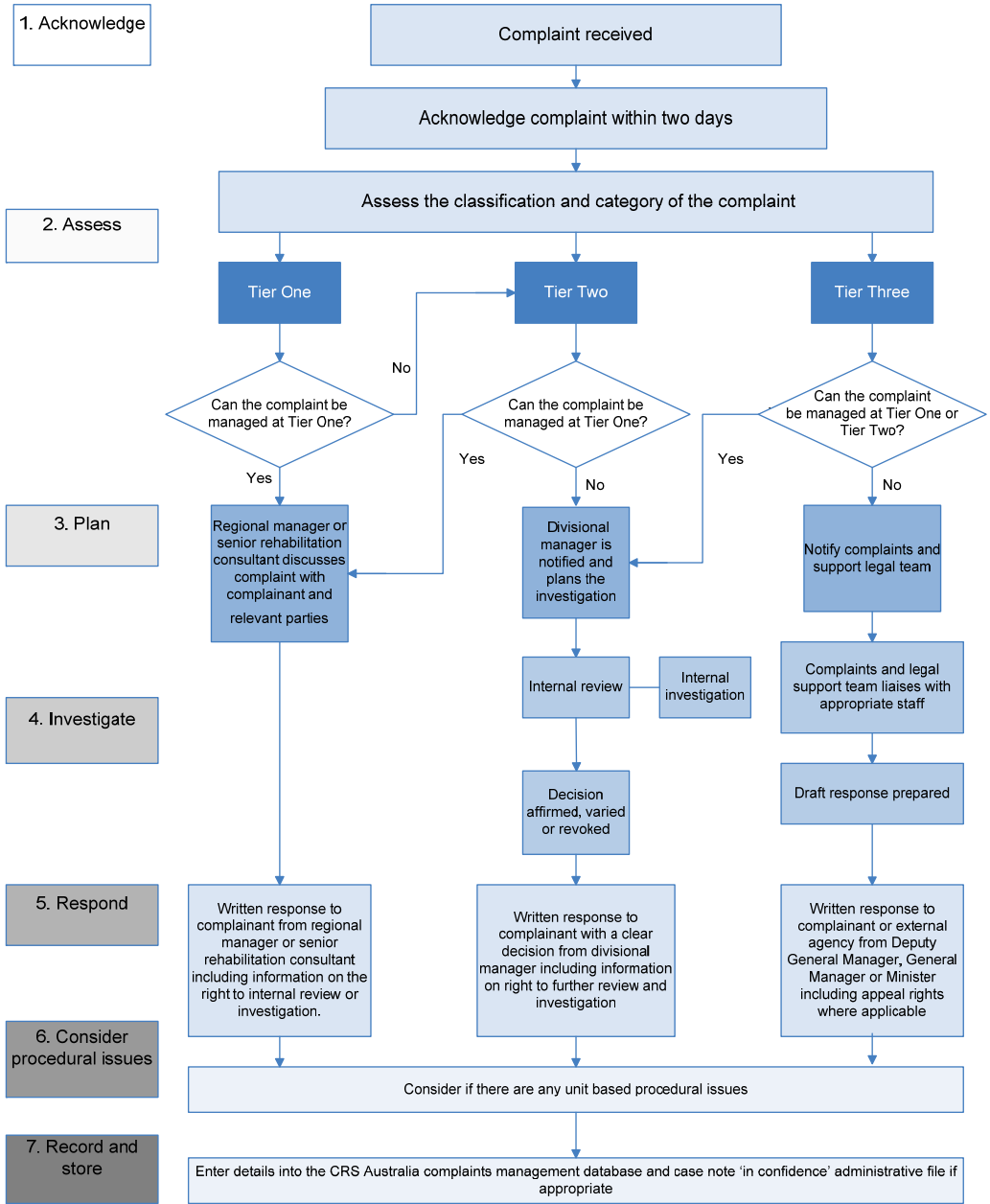**CRS Australia's staff classifications, roles and qualifications**

Staff Classification	Role	Qualifications
Senior rehabilitation consultant (SRC)	• provide professional leadership and coaching including involvement in quality assurance • maintain relationships with external and internal partners	Required to be an allied health professional e.g. occupational therapist, psychologist or rehabilitation counsellor with preferred understanding of, or experience in, vocational rehabilitation.
Rehabilitation consultant (RC)	• provide vocational rehabilitation services and case management of clients, including injury prevention services • deliver vocational rehabilitation programs and Job Capacity Assessments (JCA's)	Required to be an allied health professional e.g. occupational therapist, psychologist or rehabilitation counsellor with preferred understanding of, or experience in, vocational rehabilitation.
Rehabilitation officer (RO)	• support case management activities • assist job seekers to work through employment barriers under RC supervision	Required to have completed Certificate IV in Employment services, Disability Work, Community Services (service coordination), Mental Health (non-clinical) or equivalent.
Employment services consultant (ESC)	• maintain strong relationships with local employers and understand the local training and labour market • run job-seeking group-work and assist job seekers to develop job application skills	Preferred knowledge of local labour and training markets and completion of Certificate IV in Workplace Assessment and Training.
Administration officer (AO)	• deliver administrative support to their local service delivery team • undertake financial, performance reporting and asset administration activities	Preferred experience in administrative support duties including clerical support, financial management and general office responsibilities.

Source: ANAO analysis and CRS selection documentation.

Appendix 3: CRS Australia's complaint management process

Figure A 1

CRS Australia's complaint management process

1. Acknowledge	Complaint received
	Acknowledge complaint within two days
2. Assess	Assess the classification and category of the complaint

Tier One — Tier Two — Tier Three

Can the complaint be managed at Tier One? (Tier One) — No
Can the complaint be managed at Tier One? (Tier Two)
Can the complaint be managed at Tier One or Tier Two? (Tier Three)

3. Plan

- Yes → Regional manager or senior rehabilitation consultant discusses complaint with complainant and relevant parties
- No → Divisional manager is notified and plans the investigation
- No → Notify complaints and support legal team

4. Investigate

- Internal review — Internal investigation
- Complaints and legal support team liaises with appropriate staff
- Decision affirmed, varied or revoked
- Draft response prepared

5. Respond

- Written response to complainant from regional manager or senior rehabilitation consultant including information on the right to internal review or investigation.
- Written response to complainant with a clear decision from divisional manager including information on right to further review and investigation
- Written response to complainant or external agency from Deputy General Manager, General Manager or Minister including appeal rights where applicable

6. Consider procedural issues

Consider if there are any unit based procedural issues

7. Record and store

Enter details into the CRS Australia complaints management database and case note 'in confidence' administrative file if appropriate

Source: CRS Australia.

Appendix 4:   CRS Australia's complaint tiers

Table A 3

CRS Australia's complaint tiers

Tier	Description
Tier One	Complaints are made at the local level and resolved by the senior rehabilitation consultant or the regional manager at the local level.
Tier Two	Where the complaint could not be resolved at the local level and the complaint is escalated to the divisional manager. This process may involve going back to the local level and seeking further information or assistance in resolving the complaint.
Tier Three	Where a Tier Two complaint cannot be resolved by the divisional manager and is then escalated to the executive, that is the general manager or the deputy general manager—service delivery. Tier Three complaints are also complaints CRS Australia has received from external parties, such as the Complaints Resolution and Referral Service.

Source: ANAO analysis of CRS Australia information.

Appendix 5: CRS Australia's complaint categories and sub-categories

Table A 4

CRS Australia's complaint categories and sub-categories

Broad category	Category	Sub-category
Service	Organisational philosophy Access Service request Assessing need Planning and review Service provision Completion and evaluation	Responsiveness Attitude Standard Relationship Conduct Cost
Decision under Disability Services Act 1986[100]	Service completion Program not provided Non-provision of specific element Review of decision to pay specific program costs Release from liability	Responsiveness Attitude Standard Relationship Conduct Cost
Personnel		Responsiveness Attitude Standard Relationship Conduct Cost

Source: CRS Australia.

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[100]   CRS Australia advised that it does not receive as many requests to review decisions under the *Disability Services Act 1986* because it now has fewer delegations that require decisions to be made.

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