



# Provider Performance Monitoring Framework

Return to Work Service Providers  
Job Placement Providers

## Purpose

This Performance Monitoring Framework outlines ReturnToWorkSA's (RTWSA) approach to monitoring the performance of approved Return to Work and Job Placement Service Providers (Providers).

Underpinning the Performance Monitoring Framework (the Framework) is an expectation that approved Providers will:

- Adhere to operational expectations, the current Fee Schedule, the service standards and their Conditions of Approval as a Return to Work Service Provider;
- Use contemporary and evidence based practices which include a focus on the health benefits of work; and
- Deliver efficient and effective services that achieve the best outcomes for injured workers and their employers.

It is a condition of approval that the Provider comply with this Framework.

Any compliance and performance management activities will be evidence based and conducted in accordance with the principles of procedural fairness.

## Guiding principles

This Framework establishes clear, simple and defined performance measures using the following guiding principles:

*Simplicity* – the measures will be understandable and uncomplicated, both from the perspective of the claims agents who procure and manage the services and the Provider who delivers the service.

*Consistency* – the measures will be consistently applied to allow Providers to clearly understand requirements and expectations.

*Transparency* – the measures will be applied in such a way that Providers understand the methodology.

*Integrity* – the information and data that underpins the measurement outcomes will be consistent and from a reliable source of truth.

## Approach to monitoring performance

Our approach to monitoring performance uses a combination of qualitative and quantitative

measurements. Quantitative measurement includes performance measures for pre-injury employer, fit for work and job placement return to work services.

Each provider will be able to access quantitative data on their own performance, accessed securely via the RTWSA online service portal. The measures target the effectiveness and cost of return to work services, as well as the extent to which Providers are achieving return to work outcomes.

We will primarily use the following measures for performance monitoring:

*Cost* – confirms costs are reasonable relative to service delivery and is measured using the Fee Schedule and whether the amount is within expectation.

*Duration of service* – confirms the duration of service from commencement to completion and is measured by comparing referral acceptance and closure dates.

*Return to work outcome* – confirms whether a return to work outcome was achieved following service delivery and is measured using a defined metric that satisfies the criteria for an outcome payment.

*Increase in capacity* – confirms whether an improvement in work status has occurred following service delivery and is measured by difference in the income support percentage paid from commencement to completion of service.

These measures provide the minimum standard requirements for the Framework. In identifying performance, Providers will be performing either:

1. Better than the performance measures.
2. In line with the performance measures.
3. Worse than the performance measures.

In addition to the quantitative performance measures outlined in this Framework, we will undertake a range of other performance monitoring activities, including (but not limited to):

*Attestation* – we may require a Provider to attest that they are compliant with their Conditions of Approval which may then be subsequently verified by audit.

*Self-Monitoring* – where Providers provide evidence, when requested by us, of the monitoring their own performance.

*File audits* – where from time to time, we will undertake audits based on detailed file reviews.

## Monitoring compliance and assessing performance

RTWSA undertakes a range of activities to monitor Provider compliance and performance as part of its operations. We may require a Provider to demonstrate compliance with the Service Standards and Conditions of Approval at any time.

We may request from the Provider information relating to identified performance issues, stakeholder feedback, complaints or concerns.

In monitoring the performance of approved Providers we will review the performance measurement reports and conduct evaluations of services.

Providers should also regularly review and evaluate their own performance and capacity and ensure that they maintain the knowledge and skills necessary for the effective performance of their return to work services.

## Termination, suspension or amendment of approval

The Conditions of Approval provide for termination, suspension or amendment of an Approval to provide return to work services.

Evidence demonstrating significant non-compliance with the Conditions of Approval, or failure to abide by the Service Standards and requirements, may be grounds for the termination, suspension or amendment of approval by RTWSA.

## Remedial actions

We may impose requirements for remedial action as an alternative to terminating, suspending or amending the approval for a Provider. An example of remedial action may include training. We may require that remedial action be at the Provider's cost.

## Approach to managing Provider performance

Evidence and information relating to Provider performance will be recorded by RTWSA. This may include (but is not limited to):

- Complaints received (whether investigated or not);
- Concerns raised by claims agents, workers, workers representatives, or other parties;

- Data and statistical information.

Our process for the management of Provider performance issues is set out in this document. The investigation of performance issues will be managed in accordance with principles of procedural fairness:

- No bias or apprehension of bias by the decision maker;
- Evidence based;
- People likely to be adversely affected by a decision will receive all relevant information, and have an opportunity to present their case and have their response taken into consideration before a final decision is made.

## Provider performance management process

This section is a guide to how we will manage Provider performance issues. The process may be adjusted based on the specific nature of the performance issues. RTWSA and the other parties involved may elect to obtain legal advice or other external expert advice at any stage during this process. Face to face meetings will be held where this may assist the management of the process and/or the effective resolution of the issue.

The performance management process may be triggered by the receipt of a specific incident or concern, or by regular review of performance information. The high level process is set out below.

## High Level Process

Step	Who	Comment
Confirm there is evidence of repeated instances of non-compliance with the specific Conditions of Approval and/or services standards.	A panel comprising suitable staff and a senior manager from the Regulation business group (Panel lead) will be convened (Panel).	The Panel will review all evidence and form a preliminary view as to whether further investigation is appropriate at this time.  If the Panel considers the evidence on hand does not merit further investigation, this process ends.
Prepare a report on the alleged instances of non-compliance with the specific Conditions of Approval and/or services standards.  Report must summarise all relevant evidence.	Panel	
Review panel report and determine whether to proceed with an investigation.	Delegate	If the delegate decides not to proceed with an investigation the process ends.
Write to Provider setting out the alleged non-compliance and requesting a written response. A meeting may be convened to discuss the alleged non-compliance.	Panel lead	The Provider is afforded an opportunity to provide their perspective and any information or evidence.
Provider response received and reviewed.	Panel lead	Further information may be requested from any relevant parties, including the Provider. This may also include face to face meetings.
Report prepared summarising all information received.	Panel lead	
Report and all relevant evidence reviewed. Decision made as to whether remedial action is appropriate, or whether to recommend to the Delegate that the Provider's approval is terminated, suspended or amended.	Delegate	If the delegate decides no further action is required the process ends. The Provider will be advised in writing if this is the outcome.
Provider advised in writing of proposed ReturnToWorkSA action and asked to show cause as to why action should not proceed.	Delegate	The Provider will be given an opportunity to respond in relation to the proposed action before the action is confirmed.
Provider response received and reviewed. The proposed action will be confirmed or updated.	Delegate	
Provider advised of outcome.	Delegate	
Delegate's decision implemented once advised.	Delegate	
Monitoring to ensure any remedial action is completed.	Senior manager	Evidence of the completion of required actions should be provided by the Provider to ReturnToWorkSA.