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FOI 22/23-0274

### National Disability Insurance Agency

Review of Fraud Intelligence and Investigation Functions

10 March 2022

# **Deloitte**.

10 March 2022

s22(1)(a)(ii) - irrelevant material

Chief Risk Officer National Disability Insurance Agency

Dear<sup>s22(1)(a)(ii)</sup> - irrelevant i

In accordance with Official Order N365006880, we have conducted a review of the National Disability Insurance Agency's (NDIA or the Agency) Fraud Intelligence and Investigation Functions (the function).

We analysed and reviewed the Agency's existing intelligence and investigations practices against contemporary industry leading practice and gathered insights on current pain points and opportunities for enhancement within the function. Our review included discussions with internal Agency stakeholders, external stakeholders, review of documentation, benchmarking against our regulatory and industry leading best practice and engagement with our subject-matter experts.

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Our report recognises and acknowledges that fraud mitigation is an enterprise-wide responsibility, implemented via the Agency's three Lines of Defence model, with various Line 1 and Line 2 functions undertaking activities to prevent, respond and defend against fraud risk. This review acknowledges that the Agency has made significant investments to build and mature its capability to detect and respond to fraud since inception. More recently, this activity includes the ongoing work of the NDIA Fraud Taskforce, the recent implementation of the Compliance Response Team and Eligibility Integrity Uplift Project, as well as the ELT led Fraud Integrity Taskforce (FIT). These initiatives have helped drive prevention, detection and build capability to respond to fraud against the Scheme in a short period of time. In addition to these significant historical investments to uplift its fraud control capability, we also note that the Agency is balancing the reality of capacity limitations, capability uplift, organisational maturity and recent Covid19 restrictions. However, with the estimated growth in participant costs forecasted to increase to \$59.3 Billion in 2029-30, and with the nature and intensity of opportunistic fraud and serious organised criminal activity targeting the Scheme becoming more pervasive, these historical measures are no longer sufficient.

This report provides targeted observations and recommendations for capability uplift across the Agency's intelligence and investigations capabilities to prevent, detect and respond to fraud, and ensure they are fit for purpose for the scale of activity and growing risk profile of the NDIS. This will:

- Uplift processes, information, governance and technology to develop robust controls which can scale and evolve to the Agency's changing requirements and operating environment.
- Use of streamlined, semi-automated workflows to maximise process and resourcing efficiencies whilst employing an integrated approach that reinforces an Agency-wide culture of ownership & responsibility to mitigate fraud risk.
- Bolster the use of available spectrum of treatment options to provide the Agency with a more holistic response to Fraud to help disrupt and deter opportunistic fraud and non-compliance.

The measures outlined in our recommendations will support the Agency to maximise return on investment to preserve the scheme integrity and support continued delivery of impactful services for people with disability across Australia.

We are pleased to provide you with our report. Should you have any questions or require additional information, please don't hesitate to contact me on P200000 measurement.

Yours sincerely,

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### **Glossary of Terms**

Throughout this report, unless otherwise indicated, the following references apply. These references act to clarify the report and are not intended to be authoritative.

Term	Definition	Term	Definition			
ACFE	Association of Certified Fraud Examiners	NDIA / the Agency	National Disability Insurance Agency			
ACIC	Australian Criminal Intelligence Commission	NDIS / the Scheme	National Disability Insurance Scheme			
ANAO	Australian National Audit Office	Non-Compliance	An unintentional failure to abide by norms, laws or rules, usually by carelessness, accident or error.			
AFP	Australian Federal Police	Organised Criminals	Small, organised networks of entrepreneurial offenders, often transitory in nature, that develop to exploit particular opportunities for illegal profit			
AUSTRAC	Australian Transaction Reports and Analysis Centre		Use of a scheme or system for a wrongful purpose to dishonestly gain personal			
BAU	Business as usual	Opportunistic Fraud	benefits. This might involve misusing position or privileges, or dishonestly exploiting a vulnerability for personal gain.			
CMS	Case management system	PRODA	Provider digital access			
CRM	Customer relationship management	Q&S Commission	National Disability Insurance Scheme Quality and Safeguards Commission			
CRO	Chief Risk Officer	RAB	Risk Advisory Branch			
CRT	Compliance Response Team	Serious Organised Crime	Criminal activity perpetrated by two or more offenders, that requires substantial planning and organisation, and involves sophisticated methods and techniques,			
ELT	Executive leadership team		typically committed in conjunction with other offences.			
FIT	Fraud and integrity taskforce	SIB	Scheme Integrity Branch			

## Executive Summary

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# The Agency has made significant investments to build its capability to manage fraud, however an opportunity now presents to uplift this capability to address an increasing fraud risk profile commensurate with the expected growth of the Scheme.

#### Situation

The National Disability Insurance Scheme (NDIS or the Scheme) has been in operation since 2013, and includes 484,700 participants as at 30 September 2021. According to the *Annual Financial Sustainability Report 2020/21*<sup>1</sup>, in 2029-30 it is estimated that the number of participants will increase to 859,328. These figures are significantly higher than originally envisaged by the Productivity Commission. With the forecasted increase in participants numbers, it is expected that total forecasted participant costs of \$29.2 billion in 2021-22, will rise to \$41.4 billion in 2024-25, and \$59.3 billion in 2029-30 (on an accrual basis). Due to potential for exploitation, the NDIA's fraud control arrangements are needed to ensure that the Scheme is protected from being misused and public confidence remains high.

Since inception, the Agency has made significant investments to build its capability to detect and respond to fraud: This includes the ongoing work of the NDIA Fraud Taskforce, the recent implementation of the Compliance Response Team and Eligibility Integrity Uplift Project, as well as the ELT led Fraud Integrity Taskforce (FIT). These initiatives have helped to drive fraud prevention, detection and response capability across the Agency, and serve to reinforce that fraud mitigation is an Agency-wide responsibility. In addition to these significant historical investments to uplift its fraud control capability, we also note that the Agency is balancing the reality of capacity limitations, capability uplift, organisational maturity and recent Covid19 restrictions.

#### Challenge

With the estimated growth of participant costs forecasted to increase to \$59.3 Billion in 2029-30, the NDIS is increasingly exposed to the growing risk of highly sophisticated, complex serious and organised crime, criminal and opportunistic fraud perpetrated by Providers, Plan Managers, Partners in the Community, Participants, and unscrupulous family members. This has led the Executive Leadership Team (ELT) to question whether the Agency's existing fraud intelligence and investigations functions have (1) the capability to mitigate and (2) the ability to scale to address the growing fraud risk within the Scheme. Deloitte was engaged in October 2021 to review the Agency's existing fraud intelligence and investigations practices and benchmark current capabilities against contemporary industry leading practice (with consideration of current legislation and Commonwealth policies).

#### **Our results**

This report documents our observations on key procedural, process and system practices and risks for the Agency's management of fraud against the Scheme:

- We assessed the potential exposures and gaps using the review methodology outlined in Figure 1 (Right). From our review and fieldwork, three overarching findings and nine observations related to these findings have been identified.
- We have developed *recommendations* to address these observations and uplift current fraud control capability. These observations and recommendations are addressed on the following pages. Page 6 of 27

Figure 1: Review Methodology

### s47G - business information

## A. Assessment Scope and Methodology

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# Deloitte was asked by the National Disability Insurance Agency (NDIA) to undertake a review of the Agency's Fraud Intelligence and Investigation Functions

Review Scope and Methodology

#### Background

Since inception in 2013, the NDIS has been primarily focussed on transitioning participants into the Scheme from state and territory funded support. As a result, participant growth was rapid, notably growing from 29,719 in 2016 to 466,619 by 30 June 2021, with payments also rising rapidly, from \$4 billion in 2016-17 to more than \$23 billion by 2020-21. This focus on participant transition has meant that there was insufficient attention on the commensurate growth of a robust control environment and associated systems expected of a scheme of this size and complexity today.

Not withstanding this limitation, the Agency has made significant steps to build and mature its capability to detect and respond to fraud since 2018. In July 2018, the Government established the *NDIS Fraud Taskforce* (the Taskforce), which aimed to reduce potential fraud within the Agency and strengthen the fraud prevention and detection capabilities. In addition to the Taskforce, the Agency has undertaken two-year program of work focusing on building capability and capacity across fraud prevention, detection, investigation/response, treatment of risks, monitoring and reporting.

However, with the growing risk of fraud and identified infiltration of serious and organised crime actors into the Scheme, as well as the forecasted participant costs increasing to \$59.3 billion by 2029-30 (*Annual Financial Sustainability Report 2020/21*),<sup>1</sup> puts into focus whether the Agency's current approach to using intelligence and investigations to prevent, detect and respond to fraud is fit for purpose for the nature and scale of activity. © 2022 Deloitte Touche Tohmatsu.

#### Scope

Deloitte was engaged to provide insights and recommendations for capability uplift across the Agency's fraud intelligence and investigation functions, ensuring the Agency has the right resourcing, process, technology and data capabilities to effectively mitigate fraud perpetrated against the Scheme and assist with the Scheme's long term sustainability.

In accordance with the signed Official Order dated 12 October 2021, we performed the following procedures:

- Reviewed the Agency's existing fraud intelligence and investigations practices against contemporary industry leading practice (with consideration of enforcement options under current legislation).
- Gathered high level insights on the indicative costs and benefits into any proposed capability uplift of the intelligence and investigations functions within the Agency, including through improved digital platforms.
- Established appropriate lead and lag indicators for ongoing measurement of performance.
- Gathered insights and ideas on the resourcing capability to meet the needs of the NDIS's size, complexity and assist the Agency advance its capabilitiesPage 8 of 27

#### **Review Methodology**

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# B. Observations and Recommendations

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# C. Implementation Road Map

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# D. Appendices

# Appendix 1 – Recommendation Road Maps

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# Appendix 2 – Supporting Information

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### Appendix 2B

Forecasted Tip-Off Volume Calculations

### Forecasted Tip Off Volume Calculations

Period	FY	Total Tip Offs	Average Increase %	Source	Period	FY	Total Tip Offs	Average Increase %	Source
Q1	2019/20	957	N/A	November 2020 – CRO Update	Q1	2021/22	2800	15%	Forecast – 15% compounded increase per quarter
Q2	2019/20	1053	10%	November 2020 – CRO Update	Q2	2021/22	3220	15%	Forecast – 15% compounded increase per quarter
Q3	2019/20	1301	24%	November 2020 – CRO Update	Q3	2021/22	3703	15%	Forecast – 15% compounded increase per quarter
Q4	2019/20	1766	36%	November 2020 – CRO Update	Q4	2021/22	4259	15%	Forecast – 15% compounded increase per quarter
Q1	2020/21	2140	21%	November 2020 – CRO Update					
Q2	2020/21	2177	2%	February 2021 – CRO Update					
Q3	2020/21	1907	-12%	May 2021 – CRO Update					
Q4	2020/21	2435	28%	August 2021 – CRO Update					
Average	Increase pe	er Quarter	15%						

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# Appendix 3 – Benchmarking

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## Appendix 4 – Lead and Lag Indicators

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# Appendix 5 – References

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### References

Throughout this report, the following references have been applied to support our observations and recommendation. These references act to clarify the report and are not intended to be authoritative.

Reference Number	Reference
1	National Disability Insurance Agency, 2021, Annual Financial Sustainability Report 2020-21 < https://www.ndis.gov.au/media/3579/download?attachment>.
2	Organised Criminals are defined as small, organised networks of entrepreneurial offenders, often transitory in nature, that develop to exploit particular opportunities for illegal profit (Eck & Clarke, 2013, Centre for Problem-Oriented Policing, USA).
3	Australian Government Department of Finance, n.d., Risk Appetite and Tolerance < https://www.finance.gov.au/government/comcover/education/risk-appetite-and-tolerance> .
4	Australian Criminal Intelligence Commission, 2017, Australian Criminal Intelligence Management Strategy 2017-2020, <https: acim-strategy-2017-<br="" default="" files="" pdf="" sites="" www.afp.gov.au="">20.pdf&gt;.</https:>
5	Australian Criminal Intelligence Commission, 2018, 2017-18 Annual Report < https://www.acic.gov.au/sites/default/files/2020-08/acic_2017-18_ar_digital.pdf>, page 243.
6	Australian National Audit Office, 2018, Better Practice Guide: Administering Regulation < https://www.anao.gov.au/work/audit-insights/administering-regulation>.
7	Australian National Audit Office, 2019, National Disability Insurance Scheme Fraud Control Program < https://www.anao.gov.au/work/performance-audit/national-disability-insurance-scheme- fraud-control-program>.
8	Association of Certified Fraud Examiners, n.d., Using Data Analytics to Detect Fraud < https://www.acfe.com/topic.aspx?id=4294970985>.
9	Australian National Audit Office, 2010, Community Intelligence – Collecting and Processing Tip-offs < https://www.anao.gov.au/work/performance-audit/community-intelligence-collecting-and- processing-tip-offs>.
10	Association of Certified Fraud Examiners, 2019, In-House Fraud Investigations Teams: 2019 Benchmarking Report < https://www.acfe.com/benchmarking-report-2019.aspx>.
11	Australian Transaction Reporting and Analysis Centre, n.d., <i>Regulatory Quick Guide – Governance: board and senior management oversight</i> <https: 2021-03="" austrac_requickguides_governance_mar23.pdf="" default="" files="" sites="" www.austrac.gov.au="">.</https:>
12	Australian Government Attorney General's Department, 2017, Commonwealth Fraud Control Framework < https://www.ag.gov.au/integrity/publications/commonwealth-fraud-control-framework>.
13	Australian Government Attorney General's Department, 2011, Australian Government Investigations Standards 2011 < https://www.ag.gov.au/sites/default/files/2020-03/AGIS%202011.pdf>.
14	Australian Government Attorney General's Department, 2016, National Identity Proofing Guidelines < https://www.homeaffairs.gov.au/criminal-justice/files/national-identity-proofing- guidelines.pdf>.
15	Standards Australia, 2021, AS 8001:2021 Fraud and corruption control < https://store.standards.org.au/product?designationId=AS%208001%3A2021>.

### References

Throughout this report, the following references have been applied to support our observations and recommendation. These references act to clarify the report and are not intended to be authoritative.

Reference Number	Reference
16	International Standards Organisation, 2018, ISO 31000:2018 Risk Management < https://www.iso.org/standard/65694.html>.
17	Commonwealth Director of Public Prosecutions, 2021, <i>Prosecution Policy of the Commonwealth</i> <https: default="" files="" prosecution%20policy%20of%20the%20commonwealth%20as%20updated%2019%20july%202021.pdf="" sites="" www.cdpp.gov.au="">.</https:>
18	Commonwealth Director of Public Prosecutions, 2020, Guidelines for dealings between Investigators and the Commonwealth Director of Public Prosecutions < https://www.cdpp.gov.au/sites/default/files/Guidelines%20for%20dealings%20between%20Investigators%20and%20the%20CDPP%20-%20%20September%202021.pdf>.
19	Australian Federal Police, 2020, Case Categorisation & Prioritisation Model < https://www.afp.gov.au/sites/default/files/PDF/ccpm-dec-2020.pdf>.
20	Australian Federal Police, n.d., Search warrants – guidelines < https://www.afp.gov.au/what-we-do/operational-support/search-warrants-guidelines>.
21	Australian Federal Police, n.d., Search warrants – procedures < https://www.afp.gov.au/what-we-do/operational-support/search-warrants-procedures>.
22	Association of Certified Fraud Examiners, 2020, Anti-Fraud Playbook < https://www.acfe.com/uploadedFiles/ACFE_Website/Content/fraudrisktools/Antifraud-Playbook.pdf>.
23	Australian Taxation Office, n.d., ATO Fraud and Corruption Control Plan 2020-21 < https://www.ato.gov.au/General/The-fight-against-tax-crime/In-detail/ATO-Fraud-and-Corruption-Control-Plan- 2020-21/#Fraudandcorruptionprevention>.
24	Australian Government Commonwealth Fraud Prevention Centre, n.d., Investigate fraud < https://www.counterfraud.gov.au/fraud-countermeasures/investigate-fraud>.
25	City of London Police, National Lead Force Performance Outcomes, 2013 < https://democracy.cityoflondon.gov.uk/documents/s17064/Pol_07-13_KPI%20Framework%20- %203rd%20Quarter%20v%203.pdf>.
26	The Institute of Internal Auditors Australia, 2018, <i>Fraud Risk Indicators White Paper</i> < https://iia.org.au/sf_docs/default-source/technical-resources/2018-whitepapers/iia-whitepaper_fraud-risk-indicators.pdf?sfvrsn=2>.
27	Australian Government Department of Prime Minister and Cabinet, n.d., <i>Regulator Performance Guide</i> < https://deregulation.pmc.gov.au/priorities/regulator-best-practice-and- performance/regulator-performance-guide>.
28	Australian Government Attorney General's Department, Protective Security Policy Framework: Paper 11 Robust ICT Systems <a href="https://www.protectivesecurity.gov.au/system/files/2021-06/pspf-policy-11-robust-ict-systems.pdf">https://www.protectivesecurity.gov.au/system/files/2021-06/pspf-policy-11-robust-ict-systems.pdf</a>

## Appendix 6 – Stakeholder List

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### **Stakeholder Listing**

As part of this review, we undertook a number of interviews with the following stakeholders.

Name	Function	Date Interviewed
s22(1)(a)(ii) - irrelevant material	Branch Manager, Scheme Integrity Branch	7 October 2021, 11 November 2021
	Director, Investigations	10 November 2021, 11 November 2021
	Director, Intelligence	28 October 2021, 8 November 2021, 11 November 2021
	Director, Compliance	1 November 2021
	Deputy Chief Legal Counsel, Legal	12 November 2021
	Director, Strategy and Design	3 November 2021
	Branch Manager, Risk Advisory	8 November 2021
	Director, Proactive Compliance	4 November 2021, 7 December 2021
	Director, Data analytics	28 October 2021
	General Manager, Operations & Support	27 October 2021
	Chair, Risk Committee	21 October 2021
	Australian Federal Police	3 November 2021
	A/g Registrar, Quality and Safeguards Commission	2 November 2021
	A/g Deputy Registrar, Quality and Safeguards Commission	2 November 2021
	A/g Chief Investigator, Quality and Safeguards Commission	2 November 2021
	Director National Compliance, Quality and Safeguards Commission	2 November 2021
	Scheme Actuary, NDIA	30 November 2021

## Appendix 7 – Documents Reviewed

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As part of this review, we reviewed the listed documents below that were provided by the Agency.

Document #	Document Name	Document #	Document Name	Document #	Document Name
01	Intelligence and Investigations Review - September 2021	21	NDIA Investigation Handbook	41	Witness Information Sheet - Part 2 (Post Statement)
02	NDIA Fraud and Corruption Control Plan - August 2020	22	Case Closure and Summary Report Part I and Part II	42	Scheme Integrity - Overview
03	Staff Information Guide final Jan 2020	23	CLAPOOM Request Letter Template	43	Risk and referral criteria
04	Compliance and Enforcement Framework - March 2020	24	Evaluation Report	44	NDIA Fraud Risk Profile Development Framework v1.0
05	November 2020 - Risk Co - CRO Update	25	Example NDIS Investigation Plan	45	PID
06	November 2020 - Risk Co - Att A - Q1 CRO Detailed Report -FINAL	26	Example Short Form Investigation Plan	46	Board Paper on Identity Management
07	November 2020 - Risk Co - Att B - Scheme Integrity Control Principles	27	Intelligence and Investigation Prioritisation Model Form	47	Identity Management Framework - Appendix A to Board paper
08	February 2021 - Risk Co - CRO Update - final	28	Investigation Plan SOP	48	Scheme Integrity - Current State
09	February 2021 - CRO Update Q2 2020-21 - final	29	Investigation Review SOP	49	Fraud Taskforce Risk Register (as at 14-10-2021)
10	May 2021 - Risk Co - CRO update - FINAL	30	Long Form Investigation Plan - Long Form	50	Compliance Response Summary - Light Touch Policy - final - Nov 19 (1)
11	May 2021 - Risk Co - Attachment A - Q3 CRO Report Final	31	NDIA Fraud and Corruption Control Plan August 2020	51	High Value Plan Assessment - final - Nov 19
12	August 2021 - Risk Co - CRO Update - FINAL	32	NDIS Investigation Plan Instructional Template	52	NDIA Executive Report Oct v.09
13	August 2021 - Risk Co - Fraud and compliance update - FINAL	33	Post Evaluation Investigation Internal Referral Form	53	Participant - Provider Relationship Pilot - final - Nov 19
14	August 2021 - Risk Co - Att B - CRO Q4 Update - Dashboard - FINAL	34	ROI Invitation Letter Template	54	PLAN MANAGERS - final - Nov 19
15	NDIA Fraud Strategy	35	Scheme Integrity Risk and Control Report	55	Assessment Standard Operating Procedure V2.1
16	NDIA Corporate Plan 2021-25	36	Short Form Investigation Plan Instructional Template	56	Intake Standard Operating Procedure (SOP) V1.1
17	NDIA Org Chart	37	Short Form Investigation Plan	57	Quality Plan Compliance Section (draft) v0.5
18	Audit Committee Agenda June 2020 - September 2021	38	Strategic Briefing Template	58	Standard Operating Procedure - Desk Based Compliance Review V2.1 Endorsed
19	Risk Committee Agenda June 2020 - August 2021	39	Vulnerable Witness SOP	59	2.4 Compliance Response Taskforce
20	Guideline on Exhibit Management	40	Witness Information Sheet - Part 1 (First Contact) Page 23 of 27	60	2.4.a CRT Execution Plan
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As part of this review, we reviewed the listed documents below that were provided by the Agency.

Document #	Document Name	Document #	Document Name	Document #	Document Name
61	2.4.b Behavioural Change Model - concept slide	81	Agenda - CMC - 21 July 2021_Redacted	101	Scheme Integrity Business Plan v2.2
62	2.4.b Behavioural Change Model - concept slide	82	CMC Meeting Minutes 21 July 2021.docx_Redacted	102	SI RIP and Business Plan 21-22
63	2.4.c Provider Self Assessment Letter and Declaration	83	CMC Summary of Decisions Register 21 July 2021_Redacted	103	NDIA Fraud Risk Register 31 October 2020
64	11 October 2021 - Compliance Response Taskforce - FINAL	84	Endorsed Minutes 11-10-2019	104	NDIA Fraud Risk Register 6DEC 2019
65	4 August 2021 - Compliance Response Taskforce update	85	Joint Operational management Committee Minutes 02 12 19	105	NDIA Fraud Risk Register March 2021
66	19 August 2021 - 5.4.B - Compliance Response Taskforce progress update - FINAL	86	Joint Operational Management Committee Minutes 29 Jan 2020	106	Fraud Intelligence Team 2020-2021 Summary
67	20 July 2021 Attachment B - Compliance Response Taskforce update - FINAL	87	Joint Operational Management Committee Minutes 7 October 2020	107	Visio-Fraud Intelligence Team Report 30 June 2020
68	2.2 Annual Strategic Risk Review FY2021-22 - FINAL	88	NDIA CMC - Terms of Reference V0.6	108	ABR Tool V1.1
69	2.2a FY2021-22 Strategic Risk Performance Metrics & Tolerances - FINAL	89	SIGNED Joint Operational Management Committee Minutes 02 12 19	109	Altia 6.2.0 V3 SOP
70	October - Chief Risk Officer update	90	SIGNED Joint Operational Management Committee Minutes 06 11 2019	110	Alita Investigation Toolbar Guide
71	September - CRO Update	91	Terms of Reference JOMC-I - Final	111	AUSTRAC Search Request Template
72	RC Item 3.1 Quarter 3 Strategic Risk Performance Report	92	Agency Risk Appetite Statement (RAS)	112	Bank Letter - Request for information Part VIID Crimes Act
73	RC Item 3.1a NDIA Strategic Risks Performance Report	93	Agency Risk Management Strategy	113	Bank Requests V1.1
74	Risk Co Agenda Item 4.3 - Scheme Integrity Update (June 2020)	94	Risk Committee Charter	114	Call Recordings V1.0
75	Risk Co. Agenda Item 3.2a Mapping against legislative obligations	95	FC road map Closure Report v0.1	115	Case Management System - Fraud Intelligence Process V1.1
76	Item 2.2 - Attachment A - final	96	NDIA Fraud and Compliance road map - 2 Year Program of Work v1.0	116	Centrelink Information Request Letter - Request for Information NDIA Version 03_19
77	Risk Co Agenda Item 2.2 - Strategic Risk Review FY21-22 - final	97	NDIS Fraud Horizon Map v.12 20200217	117	CMS Intelligence Workflow
78	Draft Risk Co OOS paper - Attachment A	98	Identity Management Framework - Appendix A - FINAL	118	Commission Referral Template
79	Draft Risk Co OOS paper - PSPF maturity self-assessment - covering paper	99	Business Plan 20-21 Plan	119	Compliance Lock SOP
80	Risk Co. Agenda Item 3.2 Risk Management Strategy Annual Review	100	RIP 2020-21	120	Compliance Lock System Process
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As part of this review, we reviewed the listed documents below that were provided by the Agency.

Document #	Document Name	Document #	Document Name	Document #	Document Name
121	Criminal History Authorisation Form - Initial Request	141	Intelligence Functional scope V1.0	161	SOP - Universal Student Identifiers
122	Criminal History Checks v1.0	142	Intelligence Staff Guidelines V1.0	162	SOP Assessment Finalisations V1.0
123	Equifax V1.0	143	Intelligence Style Guide V1.0 FINAL	163	SOP AUSTRAC Information Requests v2.0
124	Final Template - s66(1)(a) PIC - Disclosure of Information Cth Department for its investigation	144	Medicare Information Request Letter V2	164	SOP Centrelink Information
125	Final Template - s66(1)(a) PIC - Disclosure of Information - NDIA TF- Operation-re Parties of Int.	145	MyGovID Connection Approval Form	165	SOP Quality Assurance v1.0
126	Final Template - s66(1)(a) PIC - Disclosure of Information - Request for infor by law enforcement-non-TF	146	NDIA Fraud Risk Register 31 October 2020	166	Tactical Intelligence Report 2.1
127	Finalisation checklist V1.0	147	NDIA Intelligence Sources	167	Template RFI to NDIA (Sept 2019)
128	Financial Analysis Template SOP V0.1	148	OGA Systems Access Form v4.2 2019	168	USI - Request for information
129	Financial transaction analysis SOP 0.4	149	Open Source Intelligence Guidelines V1.0	169	4.2 Attachment A - DRAFT PSPF 2019-20 Assessment - National Disability Insurance Agency
130	Fraud Intel New Starter Checklist	150	Passport Requests V1.0	170	4.2 Attachment B - Security Advisory Committee Terms of Reference ELT approved June 2020
131	Fraud Intel Process Map V2.0	151	Payment Request Process	171	Item 4.3 - Strategic Risk Performance Metrics
132	Fraud Intelligence Team Employee Exit Checklist V1.0	152	Payment Suspension Letter V3.0	172	Item 4.4 Incident Regulatory Escalation Criteria Refresh
133	Fraud Methodology Report V1.0	153	Person Profile	173	Risk Co. Agenda Item 4.2 - PSPF Maturity Self Assessment
134	Guide to myGov V1.0	154	PRODA V1.2	174	Overview of FIT initiatives - FINAL
135	Guide to PSCD V1.1	155	PSCD Access and Installation	175	Reporting Overview
136	iBase Bulk Import Spec	156	Request for disclosure of passports information V1.0	176	Detection Profile Register v0.7
137	Information Release Template V1.0	157	Risk and Prioritisation Review Template V1.2	177	NDIA 60DayCollectionofGoods
138	Intelligence & Investigation Prioritisation Model V1.0	158	Section 55 Template - bank requests V1.1	178	NDIA Return to Owner receipt
139	Intelligence Briefing Template	159	SOM - Application of Compliance and PRODA Locks v1.1	179	NDIS 3KElectronicPropertyMovementRecord
140	Intelligence framework on a page	160	SOP - Australian Tax Office Information	180	NDIS ElectronicPropertySeizureRecord
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#### As part of this review, we reviewed the listed documents below that were provided by the Agency.

Document #	Document Name	Document #	Document Name	Document #	Document Name
181	PROP - 01 - Chain of Custody	201	Our TIS Client Code	221	Premise Affidavit
182	PROP - 02 - Property Seizure Records	202	Pre Booked Onsite appointments (TIS Online)	222	Premise Warrant
183	PROP - 03 - Return to Owner	203	Pre Booked Phone Appointments	223	Process for notifying Hearing application 3LA
184	PROP - 04 - Security Incident - Property	204	On Demand Phone	224	Rights Occupier English
185	PROP - 05 - Request for Disposal	205	A guide to TIS Online	225	Rights Person Searched
186	PROP - 06 - Secure Transfer ver 1.0	206	SOP Preferred Method Communication	226	SW Long Guide
187	Disclosure Certificate	207	SOP TIS Call flow guide	227	SW Roles Responsibilities
188	Witness Contact List MASTER	208	AGS Advice - Scope and uses of NDIA's fraud investigation	228	SW Short Guide
189	Witness Contact List SHORT (open for instructions)	209	Legal Services Advice Request Form	229	Project Ivory Fraud Methodology Report
190	How To - Disclosure Index Linking FEB21	210	NDIA question on witnessing statements in matters to be prosecuted in the Victorian jurisdiction	230	Intelligence Team – Services Australia Data Exchange Information
191	How To - Evidence Index Linking FEB21	211	3LA-AffOrdertoprovide information or assistance	231	Intelligence Team – ACIC Data Exchange Information
192	CMS Intelligence Workflow	212	3LA-AppOrdertoprovide information or assistance	232	Intelligence Team – Department of Health Data Exchange Information
193	Critical Decision Guidelines	213	3LA-Ordertoprovide information or assistance		
194	Intelligence Staff Guidelines	214	AFP Letter Hearing of application for 3LA		
195	Intelligence Style Guide	215	Information provided 3LAOrder or consent		
196	NDIA CMC - Terms of Reference	216	Multiple Person and Premises Affidavit		
197	Open Source Intelligence Guidelines	217	Multiple Premises Affidavit		
198	Restricted Inquiry	218	Open Notebook		
199	Taskforce Investigation - Roles and Responsibilities	219	Person Affidavit		
200	Working with Children and Vulnerable People Policy	220	Person Warrant		
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