Income Apportionment

Sampling Activity #2

November 2023 – February 2024

Australian Government

Services Australia

Contents

Executive Summary

On 14 July 2023, the Secretary for the Department of Social Services (DSS) wrote to Services Australia (the agency) requesting a sampling activity to be undertaken, to understand the extent in which income apportionment was relied upon to calculate debts. The sampling activity was finalised on the 11 October 2023.

On 25 October 2023, the Commonwealth Ombudsman (the Ombudsman) wrote to the agency to provide their draft report into income apportionment administration. This report sets out the findings of the Ombudsman's second investigation which focusses on the remediation of cases affected (or potentially affected) by income apportionment and included 8 recommendations.

Recommendation 1 from the Ombudsman's second report requested the agency to develop a strategy for sampling potentially affected historic debts, underpayments, Administrative Appeals Tribunal (AAT) decisions and Commonwealth Department of Public Prosecutions (CDPP) referred debts. The Ombudsman requested that the sample be:

- statistically significant in size;
- provide a high rate of confidence, and
- include a range of payments across a range of years between 2003 to 2020.

The initial sampling activity that was finalised on 11 October 2023 did not meet the requirements of the Ombudsman's recommendation, therefore the agency accepted this recommendation and commenced a second sampling activity from 15 November 2023.

This report includes all outcomes from the second sampling activity and outlines the preparation the agency undertook to implement this activity. This included:

- defining the sampling methodology;

- refining the process to consistently and accurately capture sampling information, and

- recording the outcomes of sampling to facilitate analysis.

Summary of Findings

- 2,150 cases were sourced in total:
  - 1,000 determined debts between 2003   2020:
  - 150 AAT decisions
  - 1,000 arrears records

- 1,117 employment income updates that resulted in a determined debt, AAT Decision or an arrears amount related to employment income, and 714 (64%) relied upon income apportionment to calculate.
  - Of the 714 employment income updates that were identified as having relied upon income apportionment, 457 (64%) contained sufficient evidence on record to conduct a recalculation.

- Overall, recalculations resulted in a 7% reduction to the total debt value, with the following outcomes:

	Determined Debts	AAT Decisions	Arrears
Related to employment income	970	109	38
Relied upon income apportionment	614	87	13
% evidence available	410	42	5
Recalculations conducted	410	42	5
Downward Variations	264 (64%)	28 (67%)	3 (60%)
Average variation	$194.11	$608.14	$21.72
Median variation	$99.14	$351.99	$11.38
Average debt period	121 days	480 days	106 days
Upward Variations	119 (29%)	11(26%)	2 (40%)
Average variation	$179.80	$234.35	$27.48
Median variation	$66.88	$125.52	$27.48
Average debt period	207 days	442 days	111 days
Arrears	15 (4%)	0	0
Average arrears amount	$105.36	-	-
Maximum arrears	$372.72	-	-
Minimum arrears	$1.60	-	-
NIL Change	12 (3%)	3 (7%)	0

- Recalculations were conducted using either the daily or date paid methods for employment income:
  - 21 were completed using the daily method.
  - 413 were completed using the date paid method.
  - 23 were completed using a hybrid of daily and date paid methods.
  - ***Note:** NET income from bank statements was not considered sufficient evidence for this sampling activity.

- Staff timings were captured for both investigation and recalculation components and the average timings confirmed:

	Determined Debts	Arrears	Priority Formal Review (AAT)
Investigation Time	1 hour and 18 minutes	35 minutes	1 hour and 1 minute
Recalculation Time	2 hours and 30 minutes	56 minutes	3 hours and 32 minutes
End-to-End Time (Where a reca cu at on was comp eted)	3 hours and 48 minutes	1 hour and 31 minutes	4 hours and 33 minutes

- Quality Assurance (QA) was conducted on both triage and recalculation outcomes:
    o 722 triage outcomes were quality checked with 70% accuracy.
    o 506 recalculations were quality checked with 62% accuracy.
    o These outcomes demonstrate the complexities in conducting manual recalculations, over long debt periods.

- MutliCal is a standalone debt calculation tool which allows for a manual retrospective calculation of the customers entitlement to payment/s. As part of the sampling exercise, staff completed recalculations using the MultiCal tool.

- MultiCal Troubleshooting Guide provides a summary of situations where the MultiCal tool is limited in its capacity to correctly calculate entitlements and debts, indicating that either a workaround or manual calculation is required.
    o Where the guide indicated that a manual calculation was required, such as in pre June 2006 NSA/PGA taper issue, these cases were not recalculated.

- In certain instances, employment income pre-September 2003 (commencement of Working Credit Balance) and pre-September 2009 (transitional rate for pension payments) needed to be coded as assessment points, as the apportioned income that was coded on the Casual Earnings Apportionment section (within MultiCal) was not being assessed correctly in the entitlement calculations section.

- A bulk request of paper files was completed for 893 CRN's with a determined debt that was raised for a period prior to 2013. It took 12 weeks for these files to be received from the Agency's secure archives.
    o 337 determined debts and AAT cases required the use of paper files to identify whether sufficient evidence was available to recalculate the debt, as the evidence had not previously been digitised to the customer's electronic file.
    o In 20 cases, no records were located in the Agency's secure archives.

Recommendations

The sampling activity has further demonstrated the data limitations the agency has in identifying where income apportionment was relied upon to assess a customer's entitlement or to confirm a debt amount.

Triaging of customer records requires manual effort to determine whether income apportionment was used to calculate an overpayment, as there is no system indicator that provides this detail.

1. Undertake additional data validation on the finalised sampling pool to assist in identifying characteristics of employment income updates that would place customer records into the following categories:
   - highly likely to be impacted by income apportionment.
   - somewhat likely to be impacted by income apportionment.
   - highly unlikely to be impacted by income apportionment.

2. Investigate the potential to utilise Rapid Automation (Debt Assist 1.1 variant) to document records that require pre-CAM treatment (pending advice from DSS). This would include specific information relating to the activity that generated the debt, supporting staff in the investigation process.

3. Utilise ASFIX3 system trigger (as used for ICP remediation) to remove employment income coded under specific AMR's that are identified as being impacted by income apportionment. The system trigger will leave a started activity on the customer record for staff to review and update with new income details based on the General Instructions (pending advice from DSS).

4. Further work is required to determine staff effort to engage with employers and other third-party organisations, to gain a full order magnitude cost of recalculation effort. High levels of QA measures should be factored into these calculations.

5. Development of a new calculation tool and or enhancements to the existing MutliCal tool is necessary to improve efficiency and reduce the need for manual calculations and workarounds.

6. If manual recalculations are required to support implementation of the General Instructions, a strategy should be developed taking into consideration the scarcity of staff with the required expertise, along with the complexity that increases with the debts age.

7. Where further sampling may be required, instead of the requirement of manual effort to find records with daily information alternatively explore other methods of identifying debts that were raised using daily rates and then complete a recalculation using the income apportionment method, to obtain a comparison.

8. A strategy for acquiring paper files should be developed, which includes a streamlined process for requesting files and sufficient staffing resources to prevent delays, if deployed on a larger scale. This strategy would need to be appropriately costed, to ensure the Agency is able to capture the administrative and effort costs associated with the identification, retrieval, and secure storage/management of customer paper files.

9. Recalculations were only performed if the record contained sufficient information that covered the full period of the debt, however, recalculations using partial evidence may offer systemic insights.

Detailed Findings

2,150 records were sourced, however 3 were deemed unsuitable for the exercise, leaving 2,147 in total to be reviewed. Of the 2,147 records reviewed, 1,030 did not relate to employment income.

Of the 1,117 records that did relate to employment income, income apportionment was relied upon in 64% of cases.
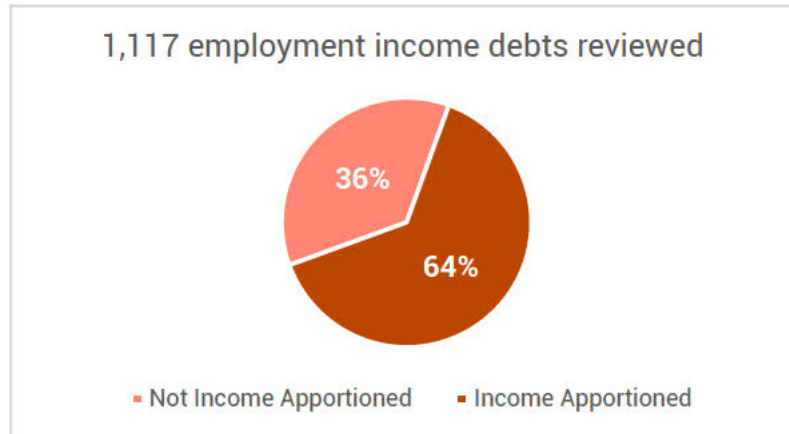
The total sample was to include historically raised employment income debts within each year between 2003 to 2020, along with 150 AAT decisions related to employment income, and 1,000 arrears records (paid or unpaid).

Agency databases were used to select these records, and staff verified the relevant dates throughout the sampling activity and corrected these dates where appropriate.

At the conclusion of the activity, the breakdown of records per year is outlined below:
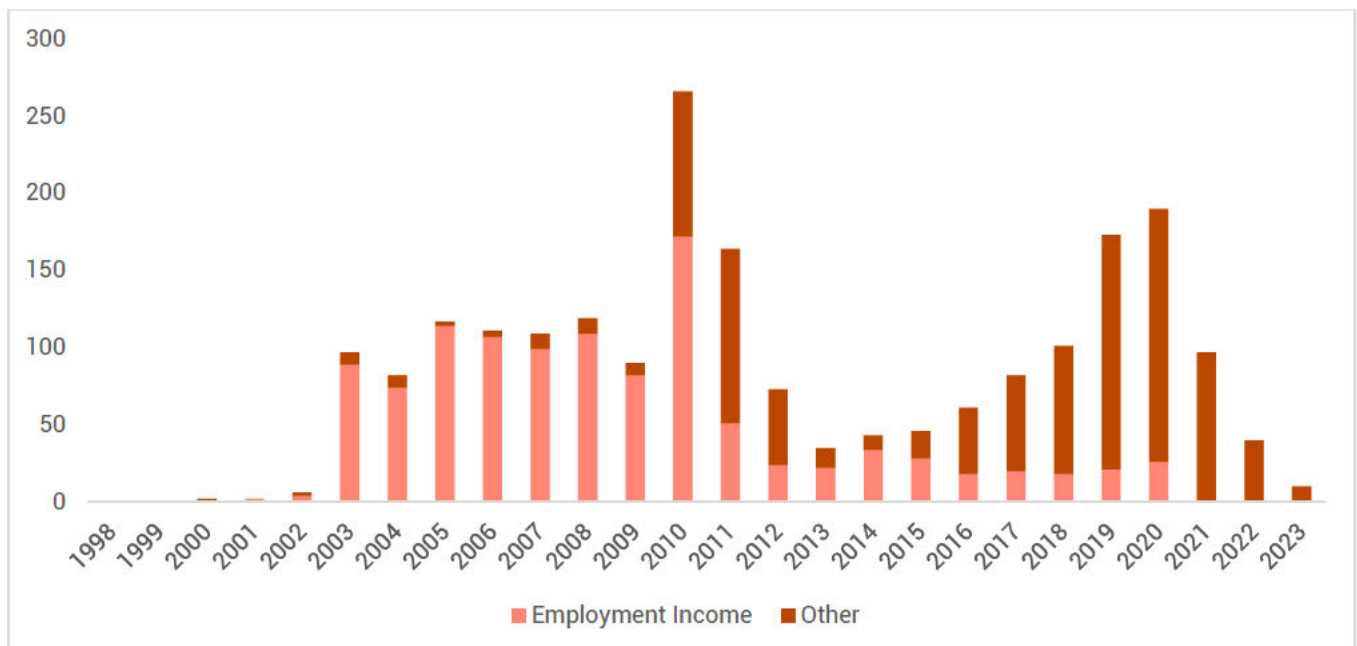
- Records prior to 2003 relate to AAT decisions, and post 2020 relate to Arrears.

All payment types included in the sampling were impacted by income apportionment. Youth Allowance, Sickness Allowance and Parenting Payment Single payments had the largest impact (69%), while JobSeeker Payment/Newstart Allowance (8%) and Age Pension payments had the least impact (29%).

Payment Type vs Income Apportionment

	AGE	AUS	CAR	DSP	JSP	PPP	PPS	YAL	SKA
Total Records	253	47	51	234	277	119	198	235	13
Emp Inc Debts	89	19	37	116	12	99	149	150	9
Inc App Debts	26	8	18	64	1	64	100	108	6

When comparing income apportionment and the daily or date paid methods, evidence covering the full employment income update period was required to complete a recalculation and determine any variation to the debt value and/or debt period.

The 2 recalculation methods were:

- Daily earnings method which calculates assessable employment income using the exact days and daily amounts paid in the relevant Centrelink Entitlement Periods, or
- Date paid method which calculates assessable employment income using the total income paid in the relevant Centrelink Entitlement Periods.
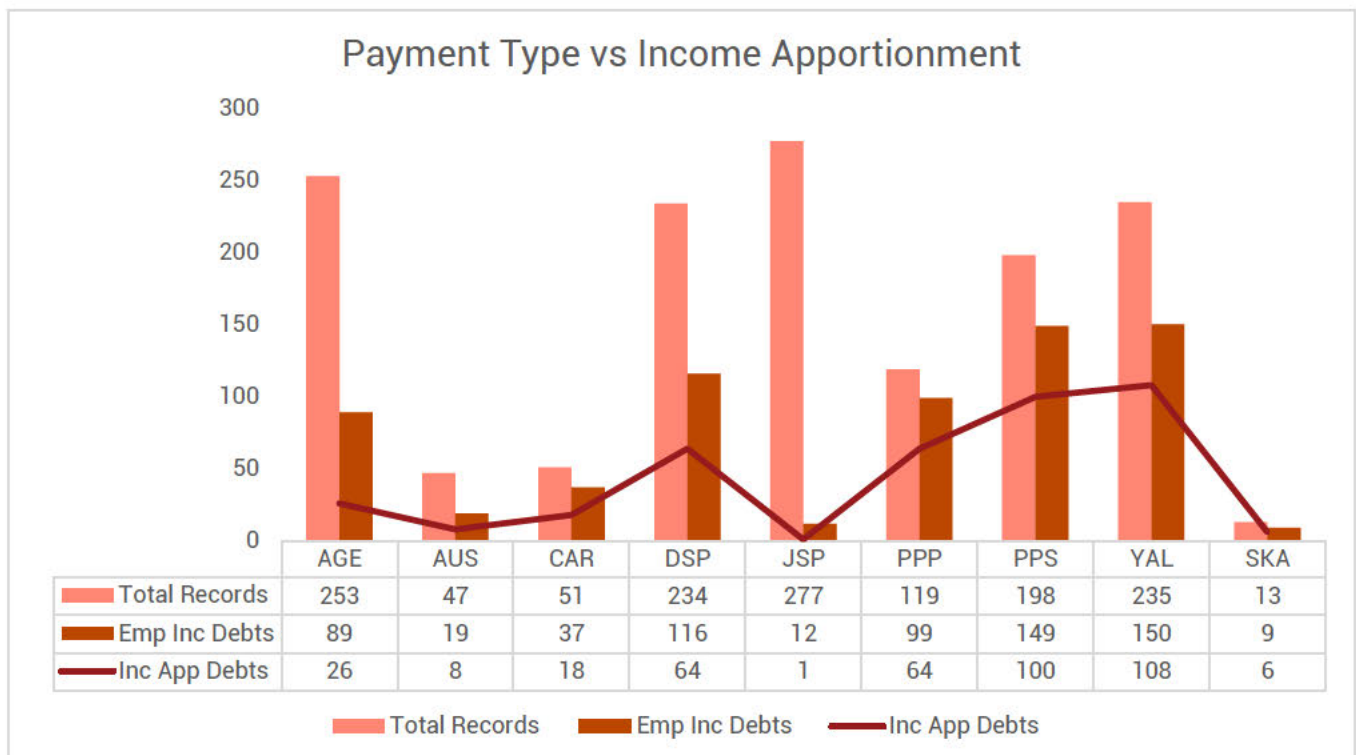
Sufficient evidence consisted of either payslip, payroll reports or any verbal information provided by the customer and documented on the record, which provided the required information to recalculate using either the daily or date paid methods.

There were 714 employment income updates that relied upon income apportionment and of these only 457 (64%) had sufficient evidence available on record, to conduct a desktop recalculation.

- Of the 457 that had sufficient evidence for a recalculation to be conducted, the date paid was the most used method (90%) to recalculate.

Recalculations resulted in the following outcomes:
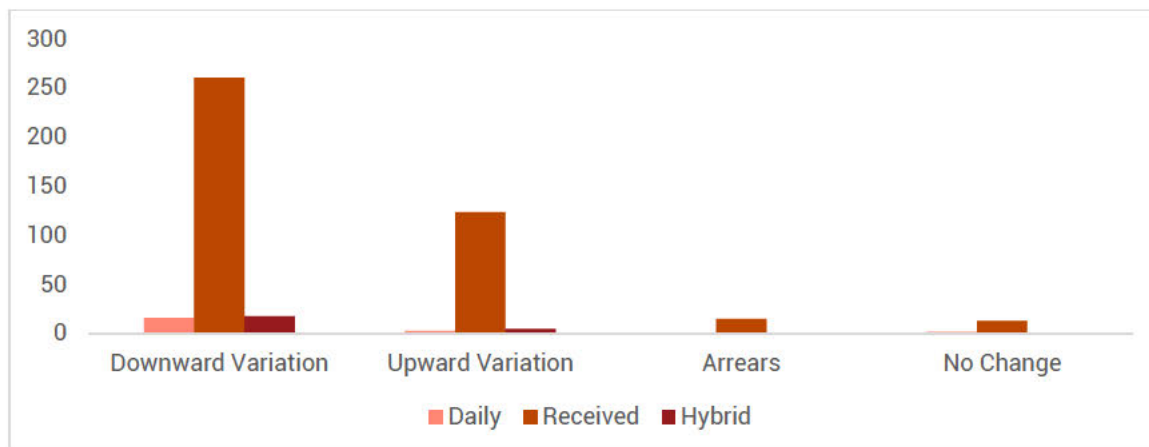
Determined debts			
	Downward Variation	Upward Variation	Arrears	No Change
# of Variations	264 (64%)	119 (29%)	15 (4%)	
AVG Variation	$194.11	$179.80	$105.36	
Max Variation	$2695.83	$1621.11	$372.72	12 (3%)
Min Variation	$0.01	$0.01	$1.60	
Median Variation	$99.14	$66.88	$81.09	
AAT Decisions			
	Downward Variation	Upward Variation	Arrears	No Change
# of Variations	28 (67%)	11 (26%)		
AVG Variation	$608.14	$234.35		
Max Variation	$3014.72	$1010.58	NIL	3 (7%)
Min Variation	$10.33	$22.16		
Median Variation	$351.99	$125.52		
Arrears			
	Downward Variation	Upward Variation	Arrears	No Change
# of Variations	3 (60%)	2 (40%)		
AVG Variation	$21.72	$27.48		
Max Variation	$43.35	$34.58	NIL	NIL
Min Variation	$10.42	$20.37		
Median Variation	$11.38	$27.48		

All 15 determined debts that resulted in an arrears outcome were recalculated using the date paid method and in 11 of these records, payslips/payroll reports were used as evidence to calculate this outcome.

In the majority of determined debts that had an arrears outcome were as a result of:

- the change in Centrelink instalment periods which employment income was being assessed.
- the accrual/depletion of working credits across the Centrelink instalment period.

The average variations were impacted by outliers for both upward and downward variations.

The below graphs demonstrate what the median variances were, which provides a more realistic assessment of how income apportionment impacted debt values.

Downward Variations

The median downward variation was $105.80

Upward Variations

The median upward variation was $71.59
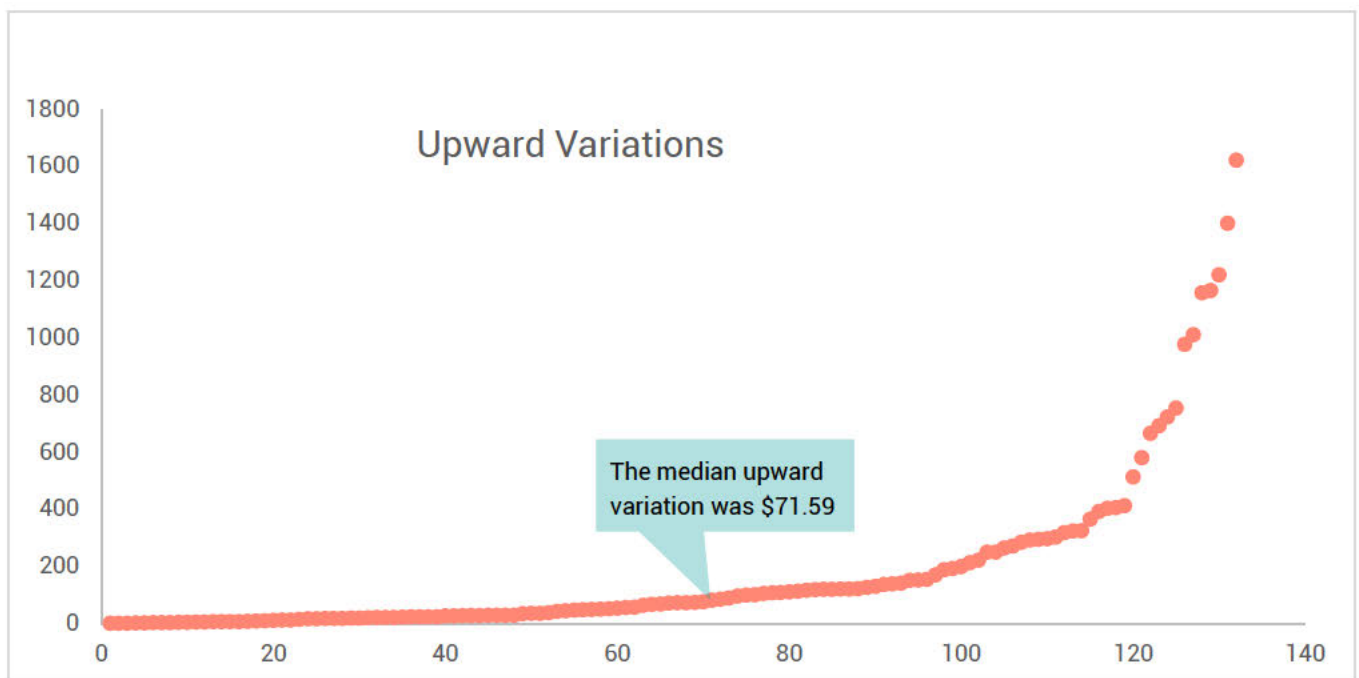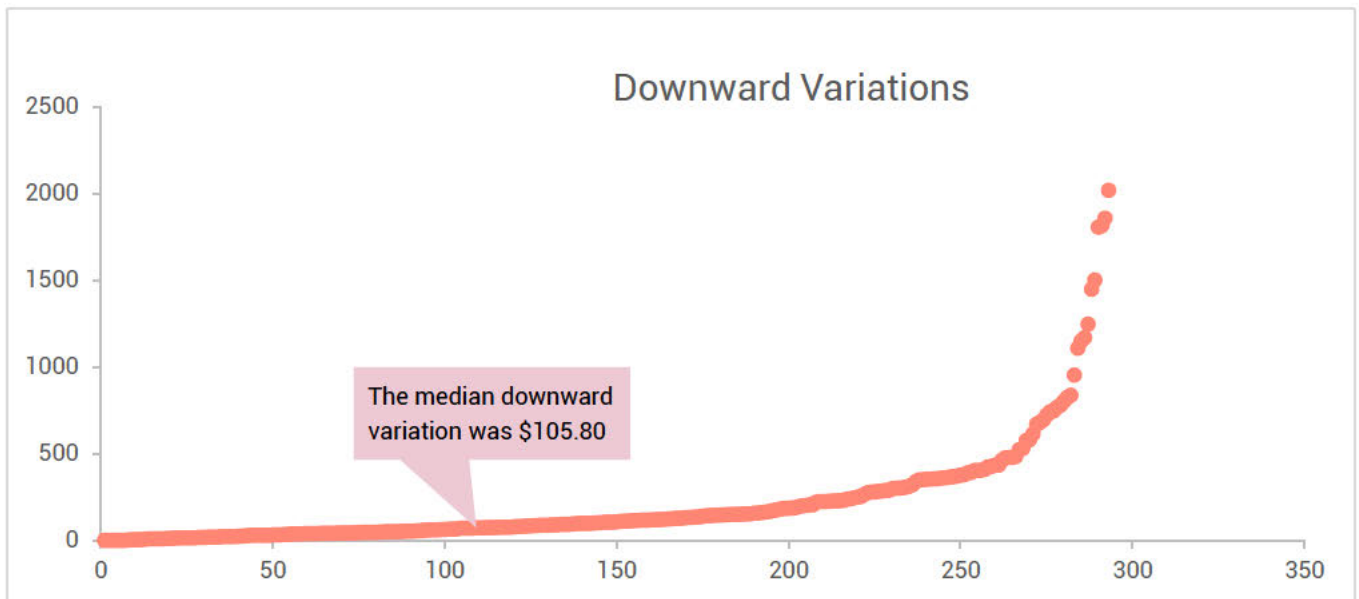
Overall debt total of the sample reduced from $620,278.75 to $576,863.97 which represents a reduction of 7%.

Throughout the sampling process, staff captured the time and effort required to investigate the record and determine whether income apportionment was relied upon to calculate the determined debt. Staff also completed a recalculation where sufficient information was available.

These timings varied based on the **length of the debt period**, as demonstrated below:
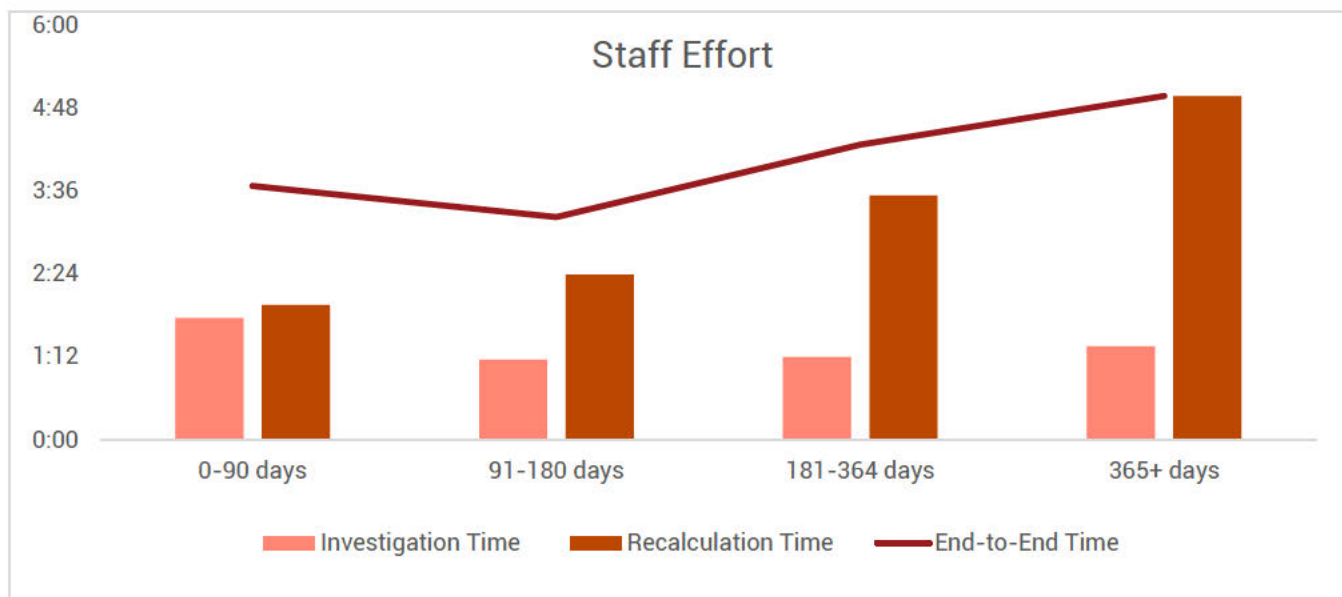
- This table represents investigation time for the 1,149 determined debt/AAT records and 998 arrears cases, along with the timings for the 457 recalculations. End-to-end timing only includes investigation timing for those case that also had a recalculation completed.

Debt Period	Investigation Time	Recalculation Time	End-to-End Time
0-90 days	1:46	1:57	3:41
91-180 days	1:09	2:24	3:14
181-364 days	1:12	3:32	4:16
365+ days	1:21	4:58	5:03

The table below shows the average timings for when a debt activity was raised, and it indicates that investigating a debt raised in past years takes longer.

Debt activity (raised)	Investigation Time	Recalculation Time	End-to-End Time
2018-2022	0:55	2:54	2:27
2013-2017	1:06	3:37	4:03
2008-2012	1:47	2:32	4:02
2003-2007	1:16	2:16	3:18

- Note: arrears records are **not included** in the debt activity (raised) table.

Approach

Scope

1,000 historically raised and recovered employment income debt records, 150 AAT decisions relating to employment income and 1,000 records that resulted in an arrears payment (paid or unpaid), were randomly selected from the agency's database.

Records in scope for this sampling activity included:

- Historically determined debts between 2003   2020.

- Arrears payments (paid or unpaid); and

- Administrative Appeals Tribunal (AAT) decisions relating to employment income updates.

Records out of scope for this sampling activity included:

- ABSTUDY employment income debts   as MultiCal does not assess ABSTUDY payments.
- determined debts relating to Family Tax Benefit and Child Care Subsidy; and

- determined debts relating to add-on payments such as Coronavirus Supplement.

  Note: the scope of any remediation activity may change into the future.

Records selected for sampling activity were representative of the payment types with historically raised employment income debts.

A data capture template was designed to record information that met the requirements requested by DSS, including:

- the extent in which income apportionment was relied upon to calculate an employment income debt.
- the impact on the debt period and value when comparing income apportionment to the daily rate or date paid method.

Sample

1,000 determined debt records consisting of 750 records with a start date between 2003 to 2010 (approx. 50 per year) and 250 with a start date between 2010 to 2020. This sampling process has also included 150 AAT decisions relating to employment income updates and 1,000 arrears records.

The following payment types make up the majority of the sample.

- Age Pension
- Austudy
- Carer Payment   Age
- Carer Payment   Disability
- Carer Payment   Other
- Disability Support Pension
- Jobseeker Payment

- Newstart Allowance
- Parenting Payment   Low Income
- Parenting Payment   Newstart
- Parenting Payment Single
- Youth Allowance   Jobseeker
- Youth Allowance   Student

Investigation

40 Payment Assurance Operations and 6 Payment Assurance Program and Appeals staff were identified to sample the debt and arrears records and determine the extent and level of impact income apportionment had on the calculation of debts.

To verify the integrity of the sample, staff were required to confirm both the start and end dates of the debt and if it was calculated using employment income.

For those identified as generated via employment income, further investigation was required to determine the characteristics of the employment income update that generated the determined debt or arrears. The following information was captured by staff via the Data Capture template (Appendix):

- was the employment income update prompted by a review.
- what was the frequency of income (e.g. income one period, weekly, etc.).
- what was the employment status (e.g. part-time/casual, full-time).
- whether income was verified by sighting evidence; and
- whether sufficient evidence was available on record to recalculate the debt.

These characteristics were included to assist the agency in developing assumptions that may indicate whether an employment income update was highly likely, or less likely, to have been impacted by income apportionment.

The Data Capture template consisted of drop-down boxes with pre-determined fields, to limit the use of free text, mitigating the risk of inconsistent information being captured.

As part of their investigations, staff were also required to capture the time taken to investigate the debt.

Recalculating the debt

For the purposes of the sampling activity, a recalculation of the determined debt or arrears was required where staff identified that sufficient evidence covering the full period of the debt was available on record. For records pre-2010, paper files were requested.

No further information was to be requested from the customer or any third party, and no changes were made to the customer record, or any debts raised.

To recalculate the determined debt, staff were required to use the best available information based on the evidence attributed to the customer record, including pay records or other probative evidence of the customers employment income, in line with the General Guidance as of 15 November 2023.

The two calculation methods were:

- daily earnings method which calculated the debt using the exact days and daily amounts paid in the relevant Centrelink instalment period.
- date paid method which calculated the debt using the total income paid in the relevant Centrelink instalment period.

Recalculations were completed using the MultiCal tool, to mitigate the risk of updates being applied to the customer's live record. As part of the recalculation process, staff were also required to capture the time taken to recalculate the debt.

To increase the efficiency of recalculations and support the QA process, staff were given permission to save the calculations to FileNet.

Naming conventions were altered from BAU processes to mitigate any risk of these MultiCal recalculations being accessed and implemented by staff not involved in the sampling process.

- Current BAU = CRN: 123456789A(1)
- Sampling Activity = Debt ID followed by staff logon, i.e. X123456   XXX111.

The outcomes of these recalculations were recorded in the data capture template. This enabled a comparison between the original determined debt calculated using income apportionment, and the determined debt amount calculated using daily earnings or the date paid method.

All completed recalculations were stored in a secure folder for QA and record keeping purposes.

Following the completion of QA processes, any MultiCal that was checked into FileNet were deleted by Integrity Transformation Branch (ITB) staff.

Quality Assurance and Proficiency Process

The following processes were implemented to support staff to capture their findings consistently and accurately, providing a higher level of confidence in outcomes.

Proficiency Process

For records where investigation did not require a MultiCal recalculation (triage), there were two proficiency levels: "Learner" and "Proficient".

Learner:

- 5 records allocated at a time until proficiency was reached.
- 100% of the first 5 records will be checked.
- Where no errors were identified, staff progressed too proficient.
- If errors were identified, an additional 5 records were allocated and 100% checked.
    - The above process continued until no errors were identified.

Proficient:

- Maximum allocation at a time increased to 10.
- Minimum 2 records spot-checked per allocation.

Quality Assurance (QA)

For consistent QA of records, QA checklists were developed for both the triage and recalculation components. Feedback was provided to the staff member via their local Quality Development Officer (QDO), or Team Manager and corrective action completed by the QA checker.

The triage component of 722 records were quality checked with 217 identified as incorrect and required corrective action.

All recalculations were quality assured with the QA Checker making any required changes to the recalculations, except for when significant errors were found. A modified approach for quality checking recalculations was deployed on 2 February, which reduced the effort in checking the MultiCal recalculation.

506 recalculations were quality checked and 194 were identified as recalculated inaccurately and required corrective action. Of the 506 recalculations QA checks, 190 had the modified QA approach applied.

All QA outcomes were recorded in a QA Tracker. Emerging errors trends were communicated to PAO leadership via daily and subsequently bi-weekly stand-ups.

Support

Prior to commencing, a refresher training of income apportionment scenarios, was delivered to staff over three days. This allowed for smaller groups and increased interactivity with each session.

The original taskcard was updated by ITB to include further detail on processes identified from the first activity as having a high error rate.

Technical support was provided by QDO local to the participating staff. Additional technical support, provided by ITB, was available virtually for QDOs through an MS Teams Channel and mailbox for case-specific assistance.

Daily check-ins occurred within ITB to share common errors identified during the QA process. This, along with queries and feedback gathered through the MS Teams Channel and mailbox were reviewed and updates made to support material as required. Updates and trends were also disseminated via daily stand-ups between ITB and PAO leadership.

Reporting

ITB collated sampling outcomes and conducted data validation exercises daily, to ensure the robustness of the outcomes.

Only outcomes that had been QA checked or did not require QA due to the staff member's proficiency were included in the weekly formal report distributed to Services Australia and Department of Social Services Senior Executives.

Approvals

Sampling Activity Approval

Name	Matt McMahon	Signature	s 47F(1)
Position	a/g General Manager		
Division	Payment Assurance Program and Appeals Division	Date	20 March 2024

Income Apportionment Sign-off

Name	Rachael Clarke	Signature	s 47F(1)
Position	a/g General Manager		
Division	Integrity Response Division	Date	19 March 2024

Appendix

Resource Description	
Logbook, inclusive of decision register; lessons learned; risk management	SA2_ITB_Inc App_Decision Logbc
Staff task card developed to support staff through the sampling process	Income Apportionment - Sar
FAQ's frequently asked questions throughout the sampling activity and associated responses.	Frequently Asked Questions V2.0.docx
Data Capture Template developed for staff to capture consistent information throughout sampling exercise	Income Apportionment - Sar
Weekly Report example of the daily report provided to senior executives of the agency, which supported the daily reports to DSS.	Income Apportionment Sam
Stakeholder Engagement and Communication Plan details stakeholders the team communicated/engage with during the sampling exercise.	SA2 Stakeholder Engagement and Cc

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PM Logbook

Insert programme or project name
Insert programme or project number as provided by Enterprise Project Office - e.g. PN2019.9001

This PM Logbook is designed to be used for both programmes and projects.

If your programme/project is registered with the Enterprise Project Office (EPO) (i.e. has a Project Number 'PN') you may have access to Sensei IQ, where the PM Logbook can be maintained digitally. If you choose to use Sensei IQ for your PM Logbook functions then this Excel workbook does not need to be maintained. If using Sensei IQ for your PM Logbook functions, you will find page tabs for Risks, Issues, Change, Decisions and Lessons Learned. Interdependencies are captured as Key Dates and may also be recorded as tasks within the schedule. Resources to support projects and programmes using Sensei IQ can be found in Sensei IQ Knowledge Centre on Project Hub.

The PM Logbook brings together a project's Risk Register, Issue Register, Change Register, Decision Register, Lessons Learned Register and Interdependency Register to form a dashboard for day-to-day reference. For Programme/Project Management guidance, refer to Portfolio, Programme and Enterprise P3 Framework on the Framework HSI page.

PM Logbook Usability Information

Throughout the spreadsheet, information in text boxes provides guidance information for logbook entries. If a text box is obstructing information from being entered into a cell simply click & hold the mouse (select) on the text box and drag it to a new position. When the spreadsheet is saved, closed and reopened the text box may return to its original position.

The spreadsheet has specific functions and cells which cannot be edited by users. In particular if you need to add further rows to the Risk For printing, we recommend not changing the print settings. These have been pre-set to ensure each worksheet prints on one page and an appropriate paper type is chosen for the dimensions of the worksheet. Use a separate Excel file for each programme/project. Once the name of the programme/project and PN# is entered, this information appears on page headers.

Risk

Once the Risk Management Plan (RMP) is approved, update and use these registers to monitor, review and report risks and their associated treatments on a day-to-day basis. The RMP <u>MUST</u> be reviewed, updated and used for monthly reporting as it is the mandatory risk management document. Do not delete closed risks. Risks MUST be managed in accordance with the agency's Enterprise Risk Management Policy.

Issue

The Issue Register is designed to assist in capturing, evaluating and managing issues identified in the programme/project. <u>Remember</u>: if an issue may cause a programme/project to breach one of the tolerances, escalate immediately and submit an Exception Report with the escalation.

The first column of the Issue Register, 'Significance to Portfolio?' records issues that may be impacting the agency as a whole. These issues may best be resolved at the Portfolio level.

Change

Project change control is part of dynamic Programme/Project Management and it is important to ensure that project changes are managed and coordinated. The Change Register records and tracks changes for quick reference in a programme/project.

Decisions

The Decisions Register records decisions made over the life cycle of the programme/project.

Lessons Learned Register

The Lessons Learned Register is a repository for lessons identified during the management of the programme/project. Lessons captured and reported are registered by the EPO to enable improvements in future programmes/projects. At the completion of the programme/project, provide a copy of the Lessons Learned Register and Closure Report to the EPO, so the agency can learn from your experience.

Interdependency

The Interdependency Register records programmes and projects, activities, delays that impact or have interdependencies on delivery of your

Enterprise Project Office Assistance

For assistance with completing the PM Logbook - either this template or the digital version on your Project Server site, email the EPO -
s 47E(d)   @servicesaustralia.gov.au

Decision Management

Date Escalated	Decision Details (Query/Advice Request)	Date Response Received	Decision Advised By:	Response/Advice Provided	Attachment
23/08/2023	If evidence is not available for the full debt period being reviewed, a recalculation cannot be undertaken. This includes where there is a missing payslip in the middle of the period. We are unable to use YTD figures to determined the missing amount.	23/08/2023	DPC	DPC advised a recalculation is unable to be conducted where we do not have evidence that covers the full debt period, including where only one payslip is missing - we are unable to use YTD figures. This was provided verbally.	
24/08/2023	1.Debt start dates for undetermined debts are not always accurate. We have found a number of records where the debt start date appears to be for an earlier period, however when reviewing the record – the debt actually commences at a later time. a.This could pose a risk to us being able to sample 100 records for each financial year between 10/11 to 19/20;	24/08/2023	DPC and DSS	Hi al As discussed with JK earlier– we record, including the observations and keep going with the original 1,000 sample (ie no swap outs etc at this stage). I think it demonstrates the issues we have with these matters (due to age etc), legacy systems and the fact that we do not know this sample until we individually investigate the matters. Again – no action is to be taken on the customer's record as part of this sampling exercise please. This aligns with the agreed approach for sampling eg if we action FND – why would we not action debts and arrears etc. This is not part of our agreed sampling framework. I have just spoken to DSS – they agree.	✉ AD9AF306.msg
24/08/2023	2.Some of the undetermined debts we have been allocated are not related to employment income. a.This could pose a risk to determining the extent in which income apportionment impacted employment income debts; b.An option could be to replace these CRN's with another CRN from the 87,000 potential overpayments; c.This would ensure we are able to sample 1,000 employment income debts.	24/08/2023	DPC and DSS	Hi al As discussed with JK earlier– we record, including the observations and keep going with the original 1,000 sample (ie no swap outs etc at this stage). I think it demonstrates the issues we have with these matters (due to age etc), legacy systems and the fact that we do not know this sample until we individually investigate the matters. Again – no action is to be taken on the customer's record as part of this sampling exercise please. This aligns with the agreed approach for sampling eg if we action FND – why would we not action debts and arrears etc. This is not part of our agreed sampling framework. I have just spoken to DSS – they agree.	✉ AD9AF306.msg
24/08/2023	3.If staff identify an undetermined debt should be FND'd, for example the debt is solely due to duplicate income, can they complete the FND action? a.Note, this would reduce the number of debts being sampled; b.We could replace the CRN with another from the 87,000;	24/08/2023	DPC and DSS	Hi al As discussed with JK earlier– we record, including the observations and keep going with the original 1,000 sample (ie no swap outs etc at this stage). I think it demonstrates the issues we have with these matters (due to age etc), legacy systems and the fact that we do not know this sample until we individually investigate the matters. Again – no action is to be taken on the customer's record as part of this sampling exercise please. This aligns with the agreed approach for sampling eg if we action FND – why would we not action debts and arrears etc. This is not part of our agreed sampling framework. I have just spoken to DSS – they agree.	[image]
28/08/2023	An AGE pension customer whose potential overpayment was generated due to partner income, that is paid monthly (partner not in receipt of payment). The General Instructions (#8) state: 1. "Point 7 only applies to overpayments of allowances. These instructions do not address how an overpayment of a pension (e.g. Parenting Payment Single) should be assessed where the employment pay period is greater than a fortnight (e.g. monthly or quarterly periodic employment periods). Further consideration is required on how to treat employment income in these situations." Could you please provide guidance on if/how we proceed with this recalculation.	30/08/2023	ITB NM	Treat as per sampling rules ITB Reviewed the General Instructions and Pre-CAM Decision Register: · General Instructions No 7; · Pre-CAM Decision Register Point 5 Determined there is unsufficient advice on how to treat these cases - require further guidance from DSS. For sampling purposes, treat the case as income apportioned, however insufficient evidence available for recalculation to be conducted.	✉ 7EDD82.msg
28/08/2023	Process for quality assuring record sampling.	28/08/2023	ITB	· Minimum 2 CRNs per staff allocation to be checked. · All columns/characteristics are to be checked. · Fill each of the cells red (incorrect) or green (correct) – please ensure you use fill instead of changing the font colour. This will allow us to easily see which is correct/incorrect when filtering. · Where feedback is required: · Include a summary of the feedback (in Column AI) that can be provided to the staff member's QDO · Email the relevant QDO with the CRN, staff logon and feedback · Do not provide feedback directly to the staff member. 31.08.2023 - prioritise QA checks on the cases where a recalculation has been conducted, to ensure accuracy of the outcome.	✉ 1D35412D.msg
24/08/2023	Frequently Asked Questions (FAQs) v0.1 - To support sampling exercise	24/08/2023	DCP NM	24.08.23 - Shared with DCP for endorsement	✉ 81CA3A4E.msg
24/08/2023	If it is clear a debt is incorrect and should be FND'd, can this action be taken?	24/08/2023	DCP NM	24.08.23 - NIL action to be taken on customer records for sampling purposes	✉ AD9AF306.msg
24/08/2023	What action do we take if we identify the debt is not related to employment income? Do we swap them out for another CRN to ensure we sampled 1000 records that relate to employment income?	28/08/2023	DCP NM PAPAD GM	24.08.23 - No, retain the original 1000 records for the sampling exercise 28.08.23 - None - this can be decided upon completion of sampling exercise	✉ AD9AF306.msg
24/08/2023	Using Multical to assess employment income using date paid method, for pre-cam income.	29/08/2023	Compliance Helpdesk	Multical is assessing earnings correctly if coding the date paid as both start and end date.	
24/08/2023	Debt Start date for undetermined debts are not always accurate. Where we identify the start date is not within the year it was selected for, do we sub this with another CRN, to ensure we meet the 100 CRN's per financial year between 2010-11 to 2019-20?	24/08/2023	DCP NM PAPAD GM	24.08.23 - No, retain the original 1000 records for the sampling exercise 28.08.23 - None - this can be decided upon completion of sampling exercise	✉ 11A0357A.msg ✉ AD9AF306.msg
28/08/2023	Checking in Multicals to FileNet when unable to complete.			28.08.23 - Both NM's agreed to the approach to check-in Multicals using a different naming convention, and ensuring ITB have a robust process to ensure deletion. Emailed records management helpdesk to determine a way to work together to bulk delete on a daily basis. 29.08.23 - PAOD GM, PAPAD GM and P&I DCEO agreed to Multical check-in process to increase efficiencies. 29.08.23 - Records Management are no longer the business owner for deleting records in FileNet. Director James[s 47F] advised to talk to DQU or DigiOps as they are the key stakeholders in new ownership discussions. No business owner has been aligned to this work, therefore Multical deletion requests sit in a bucket awaiting action. ITB NM emailed	Proposed approach to increasing Multical recalculation efficiency - email saved in folder.
12/09/2023	Additional 1,000 undetermined records to be sampled	12/09/2023	DCP NM ITB NM	12.09.23 - Advice received from DSS requesting a further 1,000 undetermined debt records be sampled, to ensure the sample was statistically valid. DSS and Services Australia agreed to also incorporate recalculations that were previously completed for Priority Formal Review cases and matters before the Commonwealth Director of Public Prosecutions (CDPP) (203)	
13/09/2023	Exclude specific recalculations from the Priority Formal Review and CDPP cohorts.	13/09/2023	DCP NM ITB NM	13.09.23 - decision to exclude any Priority Formal Review or CDPP case that did not fit the scope of the sampling activity - including using net income from bank statements, appeals that were withdrawn without recalculation and cases that were not related to employment income.	
16/11/2023	Sampling QA Completed Advice	16/11/2023	EL1 Income Apportionment Team	16.11.23 - Where there are no errors identified, one email will be sent to the QDO / Line Manager when the staff member reaches proficiency. Where there are errors, emails will be sent straight away to ensure that staff understand and don't make the same error ongoing	Recorded in Minutes of Income Apportionment QDO Catch-up Meeting 16 November 2023.
17/11/2023	Allocation of new debts before proficiency is established.	17/11/2023	EL1 Income Apportionment Team	17/11/2023 - Where a staff member has not had their first 5 cases checked for accuracy, ITB will continue to allocate 5 cases at a time to ensure staff remain productive	Recorded in Minutes of Income Apportionment QDO Catch-up Meeting 17 November 2023.
17/11/2023	New Meeting time	17/11/2023	EL1 Income Apportionment Team	17/11/2023 - Meeting time to be rescheduled to 10Am AEDT to avoid clashes with site stand-ups.	Recorded in Minutes of Income Apportionment QDO Catch-up Meeting 17 November 2023.
1/02/2024	Sampling QA checks	2/02/2024	ITB and IRB	Seeking approval to cease conducting a full QA check of the recalculations and replace with a light touch QA check. This will allow us to expedite QA completion and once completed, redirect QA resources to completing the remaining triage and resulting recalculations. A light touch of the QA check of recalculations would solely focus on: ·identifying if the assessment that income apportionment was used to calculate the original debt was correct, and ·that there was sufficient evidence on record to recalculate the debt.	

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Risk Management

Please note - information in this Risk Management table should reflect the Risk Management Plan.
The Risk Management Plan (RMP) contains detailed information on the assessment, evaluation and proposed treatment options of each risk, and therefore any changes to any component of an individual risk (i.e. risk statement, risk category, likelihood/consequence ratings or risk level) must be incorporated into the RMP. The RMP MUST be updated whenever there is a major to risks, i.e. the closure of a risk or the addition of new risks, as the RMP is the mandatory risk management document. Please see the 'Risk Assessment Matrix' in the Risk Toolkit
s 47E(d) for more information. The Risk Treatment Plan is a tool to support the day-to-day management of risk through tracking the progress of agreed treatment activities enabling analysis of their effectiveness once complete. The RMP MUST be updated whenever there is a major to risks, i.e. the closure of a risk or the addition of new risks, as the RMP is the mandatory risk management document. *Please remove the example in italics before you use this register.*

Risk ID#	Risk Description	Risk Owner	Risk Status	Date Identified	Current Risk Level	Treatment ID#	Treatment Activity	Treatment Owner	Residual Risk Level	Treatment Start Date	Treatment Due Date	Treatment Progress (% Complete)	Date Resolved	Treatment Progress Commentary	Effectiveness
R01	There is a risk of failure to clearly communicate with staff undertaking the sampling activity, resulting in inaccurate outcomes.	ITB	Open	6/11/2023	Medium	T1.1	Development of a stakeholder engagement and comms plan to support delivery of Sampling Activity 2.	ITB	Low	10/11/23	13/11/23	100%		Plan details cadence of reporting and meetings with operational and support staff.	Fully Effective
						T1.2	Data capture spreadsheet has pre-filled options to prevent inconsistent outcomes from being recorded	ITB		10/11/23	15/11/23	100%		Limiting free text options ensures outcomes are being recorded consistently between staff situated in different geographical locations with varying levels of experience.	Fully Effective
						T1.3	Development of a Quality Assurance and Proficiency process.	ITB		06/11/23	13/11/23	100%		QA and Proficiency process implemented and is capturing errors, providing a higher confidence in outcomes.	Fully Effective
						T1.4	FAQ's generated based on common enquiries from operational staff	ITB		15/11/23				Ongoing	
						T1.5	Sampling task card has been enhanced based on findings from Sampling Activity 1 Final Report.	ITB		06/11/23	15/11/23	100%		Positive feedback received regarding the taskcard. Minimal updates have been made since publishing.	Fully Effective
						T1.6									
R02	There is a risk that Multicals checked into FileNet will be accessed by staff not participating in the sampling activity and these outcomes will be implemented.	PAPAD	Closed	28/08/2023	Medium	T2.1	Taskcard and staff comms advise PAO staff not to check-in multicals at the commencement of the activity.	ITB	Low	23/08/23	23/08/23	100%		Taskcard and staff comms were circulated with DPC and SES prior to implementation.	Fully Effective
						T2.2	Multical naming conventions were altered for the purpose of the sampling activity to allow staff to check-in their Multical if they were unable to complete it on the same day.	ITB		28/08/23	28/08/23	100%		•Current BAU = CRN: 123456789A(1) •Sampling Activity = Debt ID followed by staff logon, i.e. X123456 – XXX111.	Fully Effective
						T2.3									
						T2.4									
						T2.5									
						T2.6									
R03	There is a risk that numerous updates to the sample cohort will result in reduced productivity and delays to finalising the overall sampling activity.	PAPAD	Closed	6/11/2023	High	T3.1								Risk accepted. Sampling to commence whilst awaiting final confirmation on full scope from DSS.	Not assessed; Treatment not begun.
						T3.2									
						T3.3									
						T3.4									
						T3.5									
						T3.6									
R04	There is a risk that due to the age of some of the debts, paper files will need to be requested in order to accurately sample the debt. This may lead to delays in sampling.	ITB	Open	11/11/2023	High	T4.1	Paper files were requested prior to commencement of sampling activity to allow enough time for retrieval.	ITB	Medium	11/11/23	15/11/23	33%		We are starting to receive paper files.	Partially Effective
						T4.2	Determined debts that raised more recently have been assigned first, mitigating delays to progression of the sampling activity.	ITB		11/11/23	15/11/23	100%		Additional paper files are being requested, however these are minimal.	Mostly Effective
						T4.3									
						T4.4									
						T4.5									
						T4.6									
R05	There is a risk Multical will not be able to support recalculations for debts prior to 2010	ITB	Open	6/11/2023	High	T5.1	Multical issues guide covers multiple issues/scenarios and provides workarounds	PAB	Medium	06/11/23	06/11/23	100%	6/11/2023	Multical issues guide available for staff to access and refer to.	Mostly Effective
						T5.2									
						T5.3									
						T5.4									
						T5.5									
						T5.6									
R06						T6.1									
						T6.2									
						T6.3									
						T6.4									
						T6.5									
						T6.6									
R07						T7.1									
						T7.2									
						T7.3									
						T7.4									
						T7.5									
						T7.6									
R08						T8.1									
						T8.2									
						T8.3									
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R09						T9.1									
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						T16.6									
R18						T16.1									
						T16.2									
						T16.3									
						T16.4									
						T16.5									
						T16.6									

A. Please Note - Where the 'current risk level' is rated 'High' or 'Very High', these risks MUST have a Treatment Plan. Treatment Start dates MUST be put in the project schedule and be reported in monthly Project Status Report with the risk/s. Where Treatment Plans have costs associated above the financial tolerance/s of the project, a Change Request must be raised seeking additional resources with the Senior Responsible Official within 10 days of the SRO approving the 'High' and 'Very High' risks.

B. Please Note: If no treatment progress has been made in a 10 day period from when the Treatment commenced (i.e. Treatment Start date), the risk level ownership must be escalated to the next level of accountability as per the Services Australia Risk Management Policy - Escalation Table. It is expected that the Risk Management Plan be reviewed, with any endorsed changes subsequently reflected in this register.

C. Please Note: Treatment Effectiveness should consider the following factors: 1) Sustainability over the long term; 2) Cost viability; and 3) Whether it is a primary source of control and effect on the risk level

Issue Management

The Issue Register should be monitored by the Project Manager on a regular basis - recommend weekly reviews - to keep things moving.
An issue is a risk (or relevant event) that has happened, was not planned and requires management action. It can be any concern, query, request for change, suggestion or off-specification raised during a programme/project. The register is used to capture and maintain information on all of the issues that are being managed formally.
Please remove the example in italics before you use this register.

Issue ID#	Risk ID# (if applicable)	Date Identified	Issue Description and Impact	Plan for Resolution	Issue origin	Issue Owner	Resolution Due Date	Last Review Date	Resolution Progress %	Issue Status
1	2	5/12/2023	Multical was checked-in incorrectly using CRN format and automatically uploaded to the customer's record.	Request sent for Multical to be deleted from customer's record. Checked-in multical to also be deleted from Filenet.	PAO	ITB	6/12/2023	20/12/2023	50%	In Progress
2	4	19/12/2023	Slow system responses and Content Manager issues have resulted in only 33% of paper files being received to date.	Seeking NM advice whether to the files received to date are sufficient to meet the requirements of the sampling activity.	Scan on Demand	IARB	21/12/2023	20/12/2023	50%	In Progress
3	5	1/12/2023	Multical has an incorrect taper rate for NSS/PGA cases prior to 01/07/2006.	Workaround drafted and shared with Compliance Helpdesk and Compliance Systems. Workaround not approved. Recalculations required for this period will not be undertaken.	PAO	ITB	4/12/2023	7/12/2023	100%	Closed

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Change Control

Use this register to document and keep track of all official changes affecting the programme/project, who authorised the change and include the original change and all iterations of the change. This register helps when discussing programme/project changes at Board/Steering Committee meetings or with key stakeholders and is a mechanism to record and get official authorisation of the change(s).
Please remove the example in italics before you use this register.

Change Request ID#	Date Raised	Description and Reason for Change	Key Impact Resulting from Change	Rejected or Approved?	Change Authorised by	Specify Documents Updated to Reflect Change

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Lessons Learned Register

This register should be used on an Ongoing Basis' from the Initiate phase through to the Closure phase. It is important to continuously share lessons learned with other programmes/projects across the organisation during phases of the project/programme lifecycle. This lessons learned register provides accurate and timely intelligence for all programmes/projects throughout their lifecycle. *Please remove the example in italics before you use this register.*

Lesson Learned Diff	Description of Lesson Learned	Date Identified	Category	Point in Time Recommendation
1	Prepare activity and engage with appropriate SME s prior to the activity being commenced	24/08/2023	Change Management	Where possible commence planning with sufficient time to prepare activity and engage with appropriate business owners and SME s before commencing
2	Walk through process and support materials with onsite support staff before commencing operational activity	24/08/2023	Change Management	Proposed process should be: 1 Project team to identify requirements of sampling activity based on request; 2 Project team utilise and reuse available resources to develop ask card specific to activity; 3 Project team engage with operational technical and leadership support s aff to run through discuss issues and determine accuracy of support materials 4 Onsite technical and leadership support staff run through ask card with their operational staff and collate feedback/questions 5 Onsite technical and leadership support staff liaise with project team to discuss issues concerns and develop collaborative solutions; 6 Commence activity with operational staff;
3	Operational s aff should utilise their onsite technical and leadership support s a f for process queries. Any issues or concerns can be escalated to project team accordingly	24/08/2028	Knowledge Management	Onsite technical support s aff should be the first point of call for any queries from operational staff. They can then support staff or make an appropriate decision and if unsure escalate the query to the project team via the teams channel or mail box
4	If daily reports continue need to collate the information earlier in the day	10/10/2023	Quality Management	Commence collating individual spreadsheets into the master at 12noon. This will allow any anomalies to be identified and reported on and the report to be sent out the next morning. This will allow for basic QA of outcomes and anomalies (significant change o debt period and or value) to be removed from the report for checking prior to being reported
5	Need to lock the spreadsheets allocated to staff to ensure they are unable to adjust them	10/10/2023	Quality Management	Lock the entire spreadsheet other than the dropdown and free-text fields. Disable staff from being able to filter or copy/paste and move any of their cases around
6	Improve a location model	10/10/2023	Quality Management	As not all s a f are trained in Multical provide Multical staff a small allocation to sta t and bulk allocate the remaining cases to non-Multical trained staff. This will ensure we are able to move through our triaging in a more efficient manner and our Multical trained s a f are actioning recalculations whenever possible
7	QA process	10/10/2023	Quality Management	Need a more robust process around identifying QA's updating individual and master spreadsheets with corrective action required then how to update-data following corrective action
8	Time provided for planning and comms was extremely compact as scope and execution date was agreed upon three days prior to execution date	6/11/2023	Scope and Change Control	Scope to be agreed upon by SES and DSS at least 1 week prior to commencing. Clear timeline for delivery of plan (incl comms plan) implemented on and closure. Comms plan to include initial meeting with QDOs to walkthrough reference material prior to disseminat on and daily check ins
9	Clearly define role of each stakeholder that has an interest in the sampling exercise	6/11/2023	Stakeholder Management	Develop role statements so stakeholders are aware of their responsibilities
10	Teams Channel was open to all s aff undertaking exercise resulting in numerous queries coming through o the project team that could have been resolved by QDOs	6/11/2023	Resource Management	Support structure to mimic enterprise TPS model (i.e Peer to QDO QDO to ITS) This will assist in reducing the inflow of queries that could have been resolved via a QDO
11	Analysis of outcomes identified staff did not have a solid grasp of whether employment income had contributed o the debt and how to identify income apportionment	6/11/2023	Quality Management	Simplify askcard to include how o identify employment income contributed to debt how to identify income apportionment etc. Prior to beginning work staff to obtain fact based refresher training on debt operations tasks such as reviews and activities
12	Time was lost attempting o locate records or documents that were stored in multiple locations	12/10/2023	Resource Management	Documents and orders should be kept in a single centralised location
13	Staff did not update some parts of the spreadsheet or they modified the format causing rework or delaying the process	12/10/2023	Quality Management	Attempt to decrease our reliance on spreadsheets in areas where they may be ineffective
14	The layout and appearance of the QA feedback was inconsistent	12/10/2023	Quality Management	A single QA feedback template is developed and utilised by every staff member that performs the QA checks
15	Staff to carry out multical manual calculations were limited due o availability or not trained	12/10/2023	Quality Management	Begin rollout of training in multical and manual calculations to staff who have been identified as being highly skilled debt processing
16	Staff assigned to undertake sampling were using the exercises to consolidate their earning (multical)	12/10/2023	Resource Management	Work is divided into groups based on staffing experience level whenever possible; for example a single case under debt s given to a staff with a easier degree of expertise
17	A set quantity of cases were assigned o individuals however not all were trained in multical	12/10/2023	Resource Management	Workallocation determined by staffing equirement s; for instance prior to multical calculations accumulated multical trained s aff are first assigned a minimal amount of work
18	Having a couple of people consolidating and managing the reporting aspect worked well	12/10/2022	Resource Management	Plan o assign the responsibility to a couple of experienced and data-savvy individuals
19	Daily reporting was shared at the executive and SES levels	12/10/2023	Stakeholder Management	A streamlined version is shared or daily/weekly meetings with relevant leads who may cascade the progress/outcomes are organised
20	MS eam chat worked effectively with supporting sta f (easi ime) and served as a resource to refer back to and/or review for ca ifcat on/gu dance	12/10/2023	Stakeholder Management	Con inue to use MS team chat for communication and support
21	Some questions asked in the MS team chat could have been answered with peer-to-peer help or onsite QDO	12/10/2023	Resource Management	Cons der who may require MS chat access
22	Informat on about an individual's skill set or unplanned leave was not disclosed in a timely manner	12/10/2023	Resource Management	Regular meetings with leadership (Director team leaders and QDO's) to identify the operational s a f ski l set identify issues/trends and availability o ass st with a location of work
23	The e were ongoing discussions over the parameters or purpose of the sampling work	12/10/2023	Change Management	Clarification of staff comprehension of the parameters and except ons identified early
24	Staff referencing out dated resources	12/10/2023	Knowledge Management	Promoton and on-going communication about when updates occur to document resources (FAQ s Task cards and SME advice)
25	Leads QA checks and support staff with a background of debt functions assigned to manage the sampling work was beneficial	12/10/2023	Resource Management	Con inue to ensure that suitable people are assigned to a specific in tiative

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Risk Category	Risk Type	Likelihood rating	Consequence rating	Risk Level	Risk Status	Treatment Decision	Treatment Status	Effectiveness	Yes/No	Issue Category	Change Category	Risk Owner Escalation	Lesson Category	Risk Owner acknowledgement	Risk Owner's Nominal Classification
Policy advice & design	Threat	Almost certain	Minor	Very high	Open	Accept/Retain	Open	Not assessed; Treatment not begun.	Yes	Policy advice & design	Policy advice & design	Very High: Escalated	Business case/ Investment Proposal	Risk Owner agrees to accept ownership of risk	Secretary
Product & payment processing	Opportunity	Likely	Moderate	High	Closed	Treat	Closed	Fully Effective	No	Product & payment processing	Product & payment processing	Very High: Not Escalated	Project Governance	Risk Owner does not agree to accept ownership of the risk	Deputy Secretary (Associate Secretary)
Payment compliance		Possible	Major	Medium		Avoid		Mostly Effective		Payment compliance	Payment compliance	High: Escalated	Scope and Change Control	Not yet escalated to Risk Owner	General Manager or SRO
Security		Unlikely	Extreme	Low		Transfer		Partially Effective		Security	Security	High: Not Escalated	Interdependency Management	Escalated to Risk Owner response pending	National Manager or Project Manager
Programme integrity threats			Outstanding			Share		Not effective		Program integrity threats	Program integrity threats	Medium: Not Escalated	ICT Management		
Community engagement										Community engagement	Community engagement	Low: Not Escalated	Resource Management		
Customer experience										Customer experience	Customer experience		Legal Management		
Government relations										Government relations	Government relations		Financial Management		
Environmental sustainability										Environmental sustainability	Environmental sustainability		Programme/Project Documentation		
Legal support										Legal support	Legal support		Programme/Project Planning day to day Management		
Business continuity										Business continuity	Business continuity		Supporting Departmental Frameworks		
Enterprise change										Enterprise change	Enterprise change		Risk Management		
Governance										Governance	Governance		Issue Management		
Finance										Finance	Finance		Schedule Management		
People										People	People		Benefits Management		
Privacy										Privacy	Privacy		Stakeholder Management		
Facilities										Facilities	Facilities		Knowledge Management		
Technology										Technology	Technology		Change Management		
Knowledge										Knowledge	Knowledge		Regulatory Requirements / Red Tape Reduction		
Business reporting										Business reporting	Business reporting		Other Lessons / Observations		
													Procurement Management		
													Quality Management		

Sampling pre-Cam (pre-7 December 2020) debts

What is income apportionment?

It's a practice the agency used to evenly divide, or apportion, a customer's employment income across two or more Centrelink Entitlement periods.
We only divide a customer's income evenly if:
- Their employer pay period didn't line up with the customer's fortnightly Centrelink entitlement period, and;
- the payslip or payroll report showed total earnings but did not show which days were worked or how much was earned in each Centrelink fortnight, and;
- We had no other information available.

What income apportionment is not

- Where the pay period aligns with the Centrelink instalment period and was assessed accurately in the original update;
- Customer has ongoing regular earnings, and the payslip information verifies the ongoing income;
- Evidence that the daily rate from payslip was used to update and verify income.

Purpose of the Sampling exercise

Sampling is a **comparative exercise** to determine the difference in a rate calculation when using income apportionment vs **daily earnings and/or the date paid method.**

We will only recalculate **debts / underpayments where it is deemed that the original update relied upon income apportionment, and there is sufficient information on the customers record to recalculate using either the daily or date paid methods.**

Recalculations are completed via Multical only. All other coding not related to earnings update will be included as it is coded on the customers record.

We are not requesting further information from the customer or employer.

In addition, **under no circumstances** will:
- any changes be made to the customer's record; or
- debts be raised.

Debts/underpayments must be calculated using pay records or other probative evidence of the customer's employment income, whether this is self-reported income, employer reporting, bank statements or a combination of these.

Recalculation methods:
- s 47E(d)

- s 47E(d)

Operating Rhythm

To achieve efficient outcomes in the sampling exercise, an <u>optimal operating rhythm</u> has been created for you to follow. Each time you receive an allocation follow the operating rhythm below:

s 47E(d)

Please Note:

- **Save your spreadsheet each time you have sampled a record**. This will allow the QA team to QA your work once its been sampled.
- QMA guidelines will be followed for this activity. The QMO will make any required corrections to your individual spreadsheet where errors in your data capture of recalculations are identified. This feedback will be provided to your QDO, they will review the feedback for accuracy before discussing with you.

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Process

As part of this exercise, we would like to understand the time to undertake the investigation component of this work. Please capture the time you start and finish investigating the record and completing the data capture and record this time in your template at column Z.

Determine if the debt or underpayment is related to a Pre-CAM (7 December 2020) employment income update.

Is the source s 47E(d)   (AMR) that generated the debt or arrears, available on customer record

Navigate to the s 47E(d)   to search for the AMR that generated the debt or arrears payment (if not located on your spreadsheet, refer to the "**How to obtain debt information from a customer record" of this task card)**. Ensure that you adjust the **Date From:** to a date prior to the date the debt or arrears payment was generated.

s 47E(d), s 47F(1)

If your search result displays as below, search for the activity via the s 47E(d)

Complete the required fields on the s 47E(d)   page and check the s 47E(d)   to see if the AMR is online.

Select **View** to open result.

s 47E(d), s 47F(1)

MUST DO: Once the activity is online you must send the activity back to s 47E(d) **to continue the sampling steps. Make sure you are not in the Customers Record when you undertake this step.**

s 47E(d), s 47F(1)

Once the activity has been returned to the Customers Record, you will be able to locate the AMR via the s 47E(d)

s 47E(d)

Retrieve all archived s 47E(d) located on the customers record

s 47E(d)
s 47E(d), s 47F(1)

Retrieving this ODR information will assist in your investigation and sampling of the customer's record.

Note: s 47E(d) was introduced early 2000s you may need to expand your search via alternate retrieval methods if the date the debt was registered falls in a date range earlier than this period.

Check:

- Customer Archive Retrieval (CAR): early 1990s through to April 2001 – refer to OB 111-02020010 Using the Customer Archive Retrieval (CAR) system and microfiche requests for archived information.
- Batch file/paper records: introduced early 1990s through to 2012 – **a bulk request for customer file information has been requested.** s 47E(d) **will forward you an email with a link to access the historical information located on a customer's file.**
- Microfiche: introduced approximately 1978 to early 1990s – refer to OB 111-02020010 Using the Customer Archive Retrieval (CAR) system and microfiche requests for archived information.

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Did employment income contribute to the debt or arrears (partially or solely)?

s 47E(d)

s 47E(d), s 47F(1)

This will take you to the s 47E(d)   .

Code 'Y' in s 47E(d)   and hit enter. This will flow you through the screens that were updated within the activity.

s 47E(d), s 47F(1)

If the s 47E(d)   was not updated within the activity, update **column N** in the spreadsheet to show that employment income did not contribute to the debt or arrears. **No further action is required.**

If the s 47E(d)   was updated within the activity, identify the first and last EPED's updated for all employers that were updated within the activity, to understand the full period employment income was updated for.

Whilst within the activity, obtain the required information to **update columns O, P, R, S, T & U in the spreadsheet.**

Note: where multiple codes have been used, record the most frequently occurring code.

Is there a limiting date affecting the debt?

s 47E(d)

 s 47E(d), s 47F(1)

s 47E(d)

As the employment income update was updated prior to the debt start date showing on the s 47E(d)   , consider whether a debt or arrears payment should have been generated within the BLD assessment period.

If you determine that a debt or arrears should have been generated within the BLD period, check the scanned docs or customer file to locate the manually calculated debt component (Multical).

If you identify the original debt/arrears do not cover the whole period updated by the source AMR, you may need to <u>assess the period prior to the limiting date</u>. This is required to understand what the actual debt amount would have been if the full period was calculated. PLEASE REFER TO YOUR QDO IF YOU ARE UNSURE.

Update column M of your spreadsheet and refer to Multical section of this task card and follow directions for saving and check in procedures.

Is there an additional debt linked to the source AMR and if YES, what type of debt is it?

When replaying activity (AMR), you will be required to check if there were additional debts generated as part of the one update.

s 47E(d), s 47F(1)

s 47E(d)

Examples of common debts that may be linked to the source AMR include: Family Tax Benefit, Coronavirus Supplement, Student Start-up Loan, Telephone Allowance, Income Support Bonus and/or Other.

Update column X in the spreadsheet.

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Undertake a desk top assessment to determine if income apportionment was relied upon to calculate the debt

Determine if daily information was used to assess the employment income update that generated the debt or arrears. Review the payslip/payroll information used to complete the original update and determine if they include:

- the exact days and exact amounts earned for each day in the relevant Centrelink Entitlement Period,
- amounts earned in employment pay periods; and
- whether the employment pay periods fall wholly within a Centrelink Entitlement Period

The following screens/information may also help determine how the debt was calculated:

- s 47E(d)   (or s 47E(d)) to find the s 47E(d)   ;
  - For information on how to retrieve archived s 47E(d)   , refer to the OB here.
- reason for the request for Explanation of Decision/Formal Review
- s 47E(d)   for: payslips/payroll reports including information obtained via SU658 or Q146 scanned Earnings Apportionment Tool (EAT) sheet/s or MultiCal/s
- Note: please check all linked records during the debt period including but not limited to partner/nominee/carer etc.

If daily information was available, was it used to assess the employment income update for all employers updated within the activity? (including where the employment period falls wholly within a Centrelink Entitlement Period)

- **YES – record findings in the sampling template, no further action is required;**
- **NO – record findings in the sampling template. Go to next question.**

Customer self-declarations

Customers were required to report income earned from employment verbally, online or through Integrated Voice Response (IVR), to determine the customer's entitlement for the relevant Centrelink Entitlement Period.

A debt or arrears may have been generated from customer declarations, where the:
- customer was not on a stimulus reporting regime and reported late;
- customer changed the amount they initially reported; or
- the agency received evidence that the amounts reported were incorrect. This includes debts raised automatically for periods less than a Centrelink Entitlement Period.

Where the customer has declared late or self-corrected previously declared earnings/employment income (via verbal update, IVR or online) that results in a debt or arrears, consider whether:

s 47E(d)

- **Where there is no doubt as to accuracy of self-declared earnings, Update the template in column V as "SELF"**

- **Where there is doubt as to accuracy of self-declared earnings, or you are unsure please refer to your QDO.**

Is sufficient evidence available on record to recalculate the debt?

The debt will need to be recalculated via Multical where you have identified that income apportionment was relied upon to code the original employment income update. Consider whether:

- the employment income update was originally coded using payslip/payroll information and the gross income for the full pay period was apportioned across two or more Centrelink Entitlement Periods; and
- the pay periods did not fall wholly within the customer's Centrelink Entitlement Period

A recalculation can only occur where there is evidence located on the customers record/paper file, that covers the full period of the employment income update that generated the debt or arrears.

Refer to section "Suitable evidence available to recalculate using Multical" of the task card

For the purposes of this exercise, requests for information are not permitted.

If you identify that a customer has been paid their employment income in advance, please seek further guidance on how to reassess these cases via the s 47E(d) mailbox.

If evidence is not available for the entire undetermined debt period, a recalculation cannot occur.

Record your findings in the sampling template (column Z).

How to obtain debt information from a customer record

Navigate to s 47E(d)

Select the potential overpayment for sampling and navigate to the s 47E(d)

Check the following information is consistent with the data in the **spreadsheet in columns C, D E, F & G:**

- **Benefit Type** (*Debt benefit name*)
- **Start date** of the overpayment
- **End date** of the overpayment
  - Where the start/end date differs from what has been pre-populated in columns D and E, please record the correct start/end dates in columns K/L.
- **Estimated Amount** of the overpayment (*undetermined debts*) and/or,
- **Calculated Amount** of the overpayment (*determined debts) and,*
- **AMR** (*Activity Management Receipt number*)

s 47E(d), s 47F(1)

Navigate to s 47E(d)

Check the date the debt was registered and raised (*highlighted below*). Ensure this is in alignment with what has been pre-filled in **the spreadsheet in column F.**

s 47E(d), s 47F(1)

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Was an underpayment generated from an employment income update?

Updates that generated an arrears result

s 47E(d)

s 47E(d), s 47F(1)

Note: the AMR that has generated an arrears payment may not be the same AMR as the earnings update. Sometimes an earnings activity is completed first and a staff member then later completes a s 47E(d) to produce the arrears.

If the AMR that completed the employment income update does not show the above result on the s 47E(d) , follow the steps outlined on page 5 to retrieve activities that directly follow the employment income update AMR.

Was there an appeal conducted on the debt?

Navigate to the s 47E(d) . Once in the s 47E(d) If any appeals are present on the record, they will appear on this screen.

s 47E(d), s 47F(1)

Review appeal records with the same benefit type the debt or arrears was generated for, where the original decision date matches the date the employment income update was completed.

Appeals relating to debts will have an "Orig Decn" of OVP.

Select the appeal and match your Debt ID to confirm it belongs to your allocated debt.

s 47E(d), s 47F(1)

Appeals relating to unpaid arrears will have an "Orig Decn" of RAT.

s 47E(d), s 47F(1)

Identify dates for the following:

- Date Client queried decn
- Date finalised
- Date ARO review request

Understanding these dates will assist in locating evidence that is available to recalculate the employment income.

Identifying if the debt/arrears start and end date differs to pre-populated dates in spreadsheet

Navigate back to the s 47E(d)
You will be presented with an ADEX Hyperlink that you need to copy.

s 47E(d), s 47F(1)

Open a new Microsoft Edge browser and paste hyperlink into the address bar (demonstrated below) and press enter to open the **ADEX** of the Debt ID allocated.

s 47E(d)

In the **General Information** tab, the area highlighted in blue is what the system has assessed as the payment impacted period.
s 47E(d), s 47F(1)

s 47E(d), s 47F(1)

An asterix (*) at the start/end date of your ADEX, highlighted in red above, indicates the date listed may not be the actual start/end of the calculation. Clicking on this will expand the period, revealing the actual date the ADEX calculation commenced (highlighted in green).

Repeat the above process if there is another Asterix in the last period of the ADEX and note this information in columns K and L in the spreadsheet.

Note: When the ADEX start date is different to the debt period this could indicate that the employment income update has been impacted by a limiting date. See *Is there a limiting date affecting the debt* further in the task card for more information.

Is the allocated debt a nil entitlement debt?

s 47E(d)

This will link to *column W in the spreadsheet.*
s 47E(d), s 47F(1)

Partial entitlement will display as shown below, with the **New Fn Rate** column displaying customer still having an entitlement to payment during the debt period.

s 47E(d), s 47F(1)

Note: ADEX may not always display when first earnings update made, and you may need to investigate further to the
s 47E(d)

Is the debt linked to a review?

In s 47E(d)

Look for a review that was finalised around the same time the employment income update was completed.
s 47E(d), s 47F(1)

navigate to the s 47E(d)

s 47E(d), s 47F(1)

Once on the s 47E(d) select the Review Actions box to navigate you to the s 47E(d)

s 47E(d), s 47F(1)

At the s 47E(d) check the debt or activity AMR attributed to the review matches the debt or AMR that created the debt / arrears. **Update column Y of your template** with your findings.

s 47E(d), s 47F(1)

Compliance Reviews in s 47E(d)

Ell reviews (specifically Income Compliance Program reviews) can also be reviewed in s 47E(d)

s 47E(d)

s 47E(d)

If not already pre-populated, input the **customer's CRN** into the search criteria and click **search**.

s 47E(d)

If the review has not yet been archived, any online interactions, including reviews will appear below the search button. If not, you will need to click on Archive Search and follow the same process as above.

s 47E(d), s 47F(1)

Compliance Reviews in s 47E(d)

Ell reviews (specifically Income Compliance Program reviews) can also be reviewed in s 47E(d)

s 47E(d)

If a PAYG Online Compliance Intervention (Online Compliance Intervention/Employment Income Confirmation) or Online Income Confirmation (Check and Update Past Income) review has previously been loaded, click on the blue hyperlink to proceed to the review screen.

The following screen should then appear.

s 47E(d), s 47F(1)

Hint: *Whilst on this page, hit **F6** on your keyboard. This will open the review notes in a separate window, allowing you to navigate away from this page whilst having the review notes at hand.*
Click on the **Attachments** tab. The following should now appear.

s 47E(d)

- s 47E(d)

- s 47E(d)

Note: If you cannot determine that the underdetermined debt is linked to a review via s 47E(d), further investigation will be required. E.g. Checking s 47E(d)

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Were working credits/student income bank/work bonus affected by the debt?

For AGE Pension AGE customers navigate to the s 47E(d)   and scroll down to locate your debt dates and AMR.

s 47E(d), s 47F(1)

For all working age customers excluding student navigate to the s 47E(d)   scroll down to locate your debt dates and AMR.

s 47E(d), s 47F(1)

s 47E(d)

s 47E(d), s 47F(1)

Locate the AMR which belongs to the debt and identify if the system has overwritten it based on previous action on the record

s 47E(d), s 47F(1)

When recalculating debt: ensure the historic working credit balance prior to previous updates is used to baseline/calibrate.

19 | P a g e

For more information on the s 47E(d) see the attachment "Historical Credits"

For all student customers navigate to the s 47E(d) scroll down to locate your debt dates and AMR.
s 47E(d), s 47F(1)

s 47E(d)
s 47E(d)

Locate the AMR which belongs to the debt and identify if the system has overwritten it based on pervious action on the record

When recalculating debt: ensure the historic income bank balance was prior to previous updates is used to baseline/calibrate.
s 47E(d)

For more information on the s 47E(d) see the attachment "Historical Credits"

Multical

If a Multical is required to calculate the debt or arrears for a period **prior** to the ADEX:

s 47E(d)

Secure folder path: s 47E(d)

Recalculating the debt via Multical

As part of this exercise, we would like to understand the time to undertake the recalculation component of this work. Please capture the time you start and finish recalculating the debt/arrears and completing the data capture, and record this time in your template at column AH.

Create a baseline multical/calibrate your multical based on what the customer was paid, prior to the original employment income update being coded.

Once you have baselined/calibrated the multical, save a PDF of your multical in s 47E(d)

s 47E(d)

CHECK IN ALL RECALCULATED MULTICALS USING THE FOLLOWING NAMING CONVENTION:

- s 47E(d)
-

Recalculate the debt using the relevant assessment options below and if required, escalate to your QDO for further advice.

Suitable evidence available to recalculate using Multical

Use the following payslip examples to help determine the correct assessment as well as the calculations.

Note: If the payslip/payroll information does not show the Pay Date or Date Paid, use the pay period end date to determine the Centrelink Entitlement Period the income will be attributed to.

Payslip/payroll information indicates that employment pay periods align exactly with the Centrelink Entitlement Period

The payroll information provided can be attributed to the Centrelink Entitlement Period, as the exact alignment of the periods will ensure the calculation matches the daily earnings method.

Payslip/payroll information from multiple employers showing both daily and date paid information
Calculate using a combination of the:

- s 47E(d)
-

Payslip/payroll evidence does not show daily rates of employment income
s 47E(d)

Payslip/payroll information shows date employment income was paid but does not show daily rates
s 47E(d)

Payslip/payroll information where part of the period contains daily income information and the remainder of the period has weekly/fortnightly pay information with date paid information only
s 47E(d)

Individual payslips showing some daily income information

If a payslip shows any daily income information, this **must** be used.

For example, a payslip shows the daily income information for weekends only and not every day worked in the pay period. If the weekend dates and amounts are clearly shown on the payslip, they must be used.

Calculate using the:
s 47E(d)

Payslip/payroll information shows customer is paid weekly and has one payslip that falls entirely in the customer's Centrelink Entitlement Period

Where daily income information is not available, and the customer's pay period falls entirely within a single Centrelink Entitlement Period:

- s 47E(d)

- s 47E(d)

-

Multical earnings coding

- To reassess earnings using the **date paid method** in Multical:
  s 47E(d)

s 47E(d), s 47F(1)

Once you have recalculated the debt, save a PDF of your Multical in s 47E(d)
s 47E(d)   by:

  s 47E(d)

PLEASE REMEMBER CHECK IN YOUR MULTICAL

s 47E(d)

Resources

Included debt codes

EBT code	Debt Reason	Explanation
ECA	Employment income wrongly coded or declared	An incorrect amount of employment income for you and your partner was used to work out payments made to you
ECM	Employment income wrongly declared/coded	An incorrect amount of employment income for you and your partner was used to work out payments made to you
EPA	Partner's income wrongly declared/coded	An incorrect amount of your partner's employment income was used to work out the payments made to you
EPM	Partner's income wrongly coded/declared	An incorrect amount of your partner's employment income was used to work out the payments made to you
ESA	Employment income incorrectly coded/declared	An incorrect amount of employment income was used to work out the payments made to you
ESM	Employment income wrongly declared or coded	An incorrect amount of employment income was used to work out the payments made to you
ICA	Employment income coded or declared incorrectly	An incorrect amount of employment income for you and your partner was used to work out payments made to you
IEA	Employment Income incorrectly coded or declared	An incorrect amount of employment income was used to work out the payments made to you
IEP	Partner's employment income wrongly coded/declared	An incorrect amount of your partner's employment income was used to work out the payments made to you
IES	Your Employment Income was not declared or coded	Employment income affects the rate of payment you are entitled to. As your income was not declared or coded, the payments made to you were incorrect
IPA	Partner's income incorrectly declared/coded	An incorrect amount of your partner's employment income was used to work out the payments made to you
IPM	Partner's income incorrectly coded/declared	An incorrect amount of your partner's employment income was used to work out the payments made to you
IPN	Partner's Employment Income not declared/coded	An incorrect amount of your partner's employment income was used to work out the payments made to you
ISA	Employment Income incorrectly declared or coded	An incorrect amount of employment income was used to work out the payments made to you
ISI	Employment income declared or coded incorrectly	Employment income affects the rate of payment you are entitled to. An incorrect amount of income was used to work out the payments you received, which means these payments were incorrect
ISM	Employment income wrongly coded/declared	An incorrect amount of employment income was used to work out the payments made to you
UCE	Cash employment income not declared	An incorrect amount of cash employment income was used to work out the payments made to you
UCP	Partner's cash employment income not declared	An incorrect amount of your partner's cash employment income was used to work out the payments made to you

Other Qualification/pay ability Codes

EBT code	Debt Reason
QFE	Full-time Employment
IPE	Income precludes entitlement

Other Auto codes (Cannot be entered manually)

EBT code	Debt Reason
OTH	Other
UNS	Unknown

Multical Worksheet link

Multical worksheet

Review Type Codes located on s 47E(d)

DMP	Data Matching Program
DPI	Debt Prevention Interventions
DPR	Debt Prevention
EDM	Electronic Data Match
EII	Earned Income Intervention
EMR	Employment Reviews
ERI	Earnings Risk Intervention
EUD	Earnings Under Declared
PYG	Pay As You Go
RSS	Random Sample Survey
SEM	Service Update Employment
TAC	Trust and Company
TIP	Tip-Off
TDF	Tax Declaration Form
N/A	Not applicable

s 47E(d)   **Earnings Verification codes**

Current Codes	
NVE – Not Verified	Earnings have not been verified in any form
BIR – Business Integrity Review	Used for all Business Integrity review as it allows recording of earnings without updating the mandatory hours per fortnight field. For use by Business Integrity or Compliance staff only.
PVP – Partial Verification by payslip for current fortnight	Verification in the form of payslips does not cover the full period of employment within the current entitlement periods
FVC – Full fortnight verification for current fortnight by payslip.	Verification in the form of payslips covers the full period of employment within the current entitlement period.
FVP – Full fortnight verification for past fortnight by payslip	Verification in the form of payslips covers the full period of employment within a past entitlement period.
PVE – Partial verification by Employer contact for any fortnight	Verification in the form of employer report, phone call or fax employer covers a period of employment less than an entitlement period
FVE – Full Fortnight verification by Employer contact for any fortnight	Verification in the form of employer report, phone call or fax from employer covers the full period of employment within an entitlement period
JKP – Job keeper Payment	Allows recording of earnings without updating the mandatory hours per fortnight field.
STV – STP Employer Verified	Will indicate that STP Employer has been verified and the income being reported is not a Jobkeeper payment
STJ – STP Employer Verified (JobKeeper)	Will indicate that STP Employer has been verified and the income being reported is a Jobkeeper payment
REF – Electronic Employer Report Verified	Auto update only
Obsolete Codes (Pre December 2007)	
CNV - Conversion	
ESF – Employer has stamped/signed form	
OTH – Phone Call to employer	
PCE – Phone call to Employer	
PSP – Payslip Provided	
505 – SU505 (Income Record Form)	

s 47E(d)   & Historical Credits

Why is it Useful?

The **s 47E(d)**   display Working Credit and Income Bank balances for a given period. However, they display results **only for the most recent AMR** to affect that period. This limits our capacity to assess credit impacts across multiple activities over time.

We can view historical Working Credit and Income Bank data via the **s 47E(d)**   respectively.

Benefits include:
- Increased capacity to **assess the accuracy of credits** relative to coding actions over **multiple activities**.
- Delivering **better explanations of decisions** to customers, by referring to **specific changes** to credits.
- Ability to **calibrate Multicals** using credits available pre-debt AMR.

What Does it Look Like / How Do We Use It?

To view historical Working Credits:

s 47E(d)

To view historical Income Bank Credits:

s 47E(d)

The resulting data will appear complicated, though a large amount can be disregarded. For the most part, <mark>only three fields</mark> will be required to assess an entry. These are the <mark>AMR</mark>, <mark>Balance Amount</mark>, and <mark>Date of Effect fields</mark>, as shown:

s 47E(d)

s 47E(d)

For this exercise, let's assume that AMR 1042 is the Debt Shell AMR we are investigating.

s 47E(d)

(**NOTE:** there will be as many **entries** for a given date as there are **AMRs** that affected that date):

s 47E(d)

s 47E(d)

We can therefore deduce that coding under AMR 1042 has **reduced** the Working Credit balance for the period.

Access to this data enhances our understanding of a record and, in turn, our explanatory power.

Debt Amalgamations

When you are investigating the Adex you must take into account any other debts within the same period and ensure your Adex has assessed these correctly within the overlapping periods.

To do this you will need to open any other activities that would show up under the **Related Explanations** section of the Adex.

s 47E(d), s 47F(1)

This will show any other related activities that are relevant to the period you are assessing.

Occasionally not all related activities will show up under this section so you will still need to investigate the s 47E(d) s 47E(d) or any overlapping debts.

Once you have determined if there are any activities that overlap you will need to open the Adex explanation for these cases and make note of the AMR.

You may be required to combine these debts to be able to determine the TOTAL estimated debt. This is what we all amalgamating.

Note: You may find it easier using an Adex Scheduler for this process as you will need to combine multiple Adex's together.

To do this you need to ensure all Adex's are open. Make note of the AMR number as the earlier AMR will mean this activity happened first. You can also confirm this by checking the date the activity was registered.

Note: An easier way to think of this is old AMR means we use Old Fn Rate and a newer AMR means we use the New Fn Rate.

Once you have determined the timeline of the Adex activities, you will need to take the **Old Fn Rate** from the earlier AMR as this should reflect the amount paid to the customer.

s 47E(d), s 47F(1)

The next step is taking the **New Fn Rate** of the newer AMR as this should reflect the most up to date rate based on the updates made to the record.

s 47E(d), s 47F(1)

Once you have gathered this information you bring all the information together. The purpose of this is to determine what the customer's overpayment is based on the rate they were paid and the rate they were entitled to with the latest information on the record.

s 47E(d), s 47F(1)   s 47E(d), s 47F(1)

In the above example we are seeing that we are taking the Amount Paid/Old Fn Rate from the earlier AMR and the Amount Entitled/New Fn Rate from the later AMR.

s 47E(d), s 47F(1)

Once combined, this will now become your TOTAL determined debt.

Note: You will also need to ensure you are adjusting any debt dates required as the overlapping debts may go for a longer period or start earlier.

Taking other debts into account on MultiCal

You may be required to adjust the amount paid on your MultiCal calculation as there is a debt that was raised for another reason that overlaps into our period. The MultiCal will download the customers paid amounts from the s 47E(d s 47E(d) which means it won't read the s 47E(d) .

You will be required to manually adjust the amount paid in the MultiCal so that we are not doubling up on debt if the customer does in fact have another debt within our period.

To do this you will need to have the relevant Adex open, making note that you will be using the **New Fn Rate** for this exercise.

s 47E(d), s 47F(1)

Next step is opening the Calculation Wizard and selecting the customer payments.

s 47E(d)

Here you will select the relevant EPED and start updating the amounts paid to the customer based on the **New Fn Rate** from the ADEX. Once you have adjusted all the relevant periods don't forget to hit Calculate Debt so that the Multical updates the changes made.

This will now mean that you have taken into account the relevant debt for the periods required.

I Frequently Asked Questions

REMINDER: There is to be no customer contact or changes to the customers record under any circumstances.

1	**Question**	**Can we use the YTD figure on a payslip if it can be established no income was declared or earned during the preceding pay period?**
	Answer	*If there is a gap, and it can be established that there was **no income earned in the missing period** <u>and</u> **no earnings were declared** by the customer in that gap period, it can be determined that sufficient evidence is available.* *If there is declared income for the period we are missing payslips, it would be determined sufficient evidence is not available.*

2	**Question**	**What is the process if I am not MultiCal trained?**
	Answer	*Where you identify sufficient information is available to conduct a reassessment, please discuss with your Line Manager, who can arrange for another team member to complete the MultiCal.* *Please retain the customer information on the allocated spreadsheet, and update once the recalculation has been completed.* *Under no circumstance is there to be a FASTNOTE or KEYWORD added to the customers record.*

3	**Question**	**What is the correct process if there is a combination of partial and nil entitlement debt on the record?**
	Answer	*As the customer still had a partial entitlement during the debt period, please treat the debt entitlement as partial.*

4	Question	**What happens if I incorrectly record my timings or forgot altogether?**
	Answer	*Don't panic, whilst timings are helpful, they are not the primary focus of this exercise.*

5	Question	**If I find that a debt could be FND'd, can I action this?**
	Answer	*Unfortunately, **no**, as this is a sampling exercise, we are **not taking any action** on these records.* *If you have identified further action such as FND is required, please note this in:* • *Column AI (Further action required; select Y); AND* • *Column AQ (Comments) and continue with the usual checks/ recalculation where possible.*

6	Question	**How do I code backpay?**
	Answer	*Please refer to* s 47E(d) *and discuss with your QDO if you have further queries.*

7	Question	**Is continuous income considered income apportioning?**
	Answer	*If it has been identified that continuous income is the sole reason for the debt (i.e. 2WE earnings has been coded on* s 47E(d) *then income apportionment has not been used to calculate the debt.* *Please ensure column U in the spreadsheet is updated to reflect.*

8	Question	**How do I assess lump sums?**
	Answer	*The Treatment of Lump Sums OB (108-05020020) details how to assess some lump sums both pre and post CAM.* *If your lump sum is not covered by this OB, please discuss with your QDO.*

9	Question	**How do I assess fringe benefits?**
	Answer	*The treatment of fringe benefits has not changed. Please refer to OB 108-05020040 for information required in order to correctly assess fringe benefits.*

10	Question	**I have a payroll report which only has pay period end dates but I also have bank statements detailing the actual pay date.**

		Which dates do I use?
	Answer	We need to use the best available information for the recalculation. As such, we can take a hybrid approach by: • Using the gross amounts from the payroll report; AND • Using the date paid from the bank statements. Ensure column AC in the spreadsheet is updated to reflect 'HYBRID' as multiple information sources have been used to recalculate the outcome.

11	**Question**	I have payslip/payroll evidence that resulted in a partially verified fortnight which has not been updated as part of my Debt ID's AMR. Can this partially verified fortnight be updated (i.e. fully verified) if I'm using the Date Paid method when recalculating the debt?
	Answer	Yes - Prior to 7 Dec 2020, we would not have updated pay information for an entitlement period unless it covered the full 14 day period. When updating pay details using the Date Paid Method, these entitlement periods can now be updated. This <u>may</u> result in the recalculation dates extending. **Note:** If the customer was paid weekly, both weekly pays must be known for the entitlement period to be updated.

12	**Question**	Can verbal declarations be accepted without sighting verification (i.e. payslips/payroll report scanned to record)?
	Answer	Short answer, yes. We can accept what has been verbally provided by the customer as verified evidence as long as it has been documented; whether that be in a ^s 47E(d) Notes, Receipt or handwritten as part of scanned debt calculation evidence. This was a common occurrence in EIIP/TDF reviews and throughout the iterations of Income Compliance Program reviews. For example, customers would contact/be contacted and would verbally advise their payslips. This would be entered into the script/guided procedure and a ^s 47E(d) /Receipt generated detailing this information. As these typically do not contain Pay Dates, we can use the Payslip End Date in lieu of the Pay Date as per page 22 of the taskcard. **Note:** You will still need to ensure there is information covering the whole debt period in order to recalculate the debt.

13	**Question**	My Debt ID's AMR has ^s 47E(d) coding for the entire debt period however I am unable to locate the payslips/payroll report on ^s 47E(d) to verify this coding.

		Can this be used to recalculate the debt?
	Answer	*Short answer, yes. When using the Date Paid method to recalculate, please use the Payslip End Date coded on* s 47E(d) *in lieu of Paid Date.* *As per the OB* <u>*Recording and correcting employment income details,*</u> s 47E(d) *is used to record earnings that have been verified (i.e. via payslips or employer reporting actual earnings directly to the agency). This was typically updated via an EAT sheet, which usually provided a default Paid Date of 'Payslip End Date +1 day' (e.g. Payslip End Date 19/06/2014, default Paid Date 20/06/2014).* *Based on this, we can take payslips coded on* s 47E(d) *as verified evidence and use the Payslip End Date as the Paid Date in line with page 22 of the taskcard.* ***Note:** You will still need to ensure there is information covering the whole debt period in order to recalculate the debt.*

	Question	**In the first sampling activity, we were not allowed to check-in Multicals unless were continuing to work on it the next day. Is this still the case?**
13	**Answer**	*No, you can check-in ALL Multicals!* *As part of this activity's quality assurance process, we will be checking all recalculations and applying the QMA process. Noting this, we are requesting ALL Multicals be checked-in using the below naming convention (also detailed on page 21 of the taskcard).* s 47E(d) ***Note:** You do not need to advise us or your QDO if you are checking in your Multical.*

	Question	**Can verbal information be accepted as sufficient evidence?**
14	**Answer**	*Where the debt resulted from customer declaring their income (late declaration/correction to previously declared), please refer to page 8 of the task card – **Customer Self-Declarations.*** *Where the customer has provided verbal information to support a review of their employment income, and this information is documented on the customers record in any way (dl, scanned letters, or information that is handwritten on debt calculations) this would be considered sufficient evidence for a recalculation.*

CRN	Debt ID	Amount of debt/underpayment	Start Date of debt/underpayment (DD/MM/YYYY)	End date of debt/underpayment (DD/MM/YYYY)	Debt in as data	Debt Reason Code	Debt/Underpayment at Band/Name	Employment Income Update Completed (DD/MM/YYYY)	AMB of name at n'y that generated the debt/underpayment	If the debt/underpayment start date d flow to column D, please provide the actual debt start date (DD/MM/YYYY)	If the debt/underpayment and date d flow to column E, please provide the actual debt end date (DD/MM/YYYY)	Is there a limit ng date affecting the debt/underpayment? (Y/N)	Is the determined debt/underpayment calculated partially or solely as a result of employment income? (Y/N)	What frequency was used for the update for the debt/underpayment?	What we flashes was used to for the update that have now used a the determined debt/underpayment?	What is the employment status for the update that have now had in the determined debt/underpayment?	What evidence was used to generate the debt/underpayment?	Where was this evidence located?	If documented evidence prior died, as it updated? (Y/N)	Were Work ng Credits/Income tools/ Work Bonus affected by updates that resulted in the debt/underpayment?	Was income apportioning used to calculate the determined debt/underpayment (Y/N/ NLI)	Is the determined debt/underpayment related to the source AMB or debt/underpayment debt? (Y/N)	Is there an additional debt/underpayment related to the source AMB and / YDL, what type of debt/underpayment is L?	Is the debts and debt/underpayment related to a row as?	a soft s ent evidence are t&ib on record to recalculate the determined debt/underpayment? (Y/N)	ne taken to invest gate up until the point (hh mm)	Sampling QA completed (Y/N/P)	What evidence have you used to recalculate the determined debt/underpayment?	What is the outcome of the recalculat on?	What is the new debt/underpayment st amount? (lessen as)	New start date of determ ned debt/underpayme at (DD/MM/YYYY)	New end date of determined debt/underpayme at (DD/MM/YYYY)	Time taken to recalculate the debt/underpayme at (hh mm)	For ter action may null? (Y/N)	Book QA completed Y/N)	Book QA t ime taken (hh mm)	Date/Time Investigation Completed	Date/Time Recalculation Completed	Logon s located to	Data allocated	Type	Comments

Code	Explanation
Y	Yes
N	No

Debt Benefit Code	Debt Benefit Literal
NSA	Newstart Allowance
JSK	Jobseeker Payment
AGE	Age Pension
PPS	Parenting Payment Single
PPP	Parenting Payment Partnered
YAL	Youth Allowance
ABS	Abstudy
AUS	Austudy
DSP	Disability Support Pension
CP	Carer Payment
SpB	Special Benefit
PA	Partner Allowance
WDA	Widow Allowance

Verification Code	Explanation
BIR	Business Integrity Reviews
FVC	Full fortnight/period verification via payslip
FVE	Full fortnight/period verification via contact (i.e. phone/fax)
FVP	Full fortnight/period verification for past period via payslip
JKP	Jobkeeper payment
NVE	Not verified
PVE	Partial verification via contact (e.g. phone/fax)
PVP	Partial verification via payslip
REF	Employer's report (auto only)
STJ	STP Employer verified (Jobkeeper)
STV	STP Employer verified
CNV	Conversion
ESF	Employer has stamped/signed form
OTH	Other means (e.g. tax assessment notice)
PCE	Phone call to employer
PSP	Payslip provided
505	SU505 income record form

Employment Status Code	Explanation
PTC	Part time or casual
FTO	Full time ongoing employment
FTN	Full time non-ongoing employment

Frequency of payment code	Explanation
ANN	Annual
DAY	Daily
1WE	Weekly
2WE	Fortnightly
MTE	Monthly
8WE	8 Weekly
IOP	Income for one period
HOP	Hours for one period
LOP	Income for long/set period

Evidence used	Explanation
DLY	Daily Payslips
RECD	Date paid as per payslips/current CAM rules
HYBRID	Gross amounts from payslips with date paid from bank statements

Review Type Code	Review Type Literal
DMP	Data Matching Program
DPI	Debt Prevention Interventions
DPR	Debt Prevention
EDM	Electronic Data Match
EII	Earned Income Intervention
EMR	Employment Reviews
ERI	Earnings Risk Intervention
EUD	Earnings Under Declared
PYG	Pay As You Go
RSS	Random Sample Survey
SEM	Service Update Employment
TAC	Trust and Company
TIP	Tip Off
TDF	Tax Declaration Form

N/A   Not Applicable

Change to debt amount
Decrease
Increase
Arrears
No Change

Codes for Additional Debts
FTB   Family Tax Benefit
CVS   Coronavirus Supplement
SSL   Student Start-Up Loan
TAL   Telephone Allowance
ISB   Income Support Bonus
OTH   Other
N/A   Not Applicable

Calculated via apportionment
Y   Yes
N   No
SELF   Self-Declared

Sampling QA Completed
Y   Yes
N   No
P   Proficient

Evidence used to generate debt
Payslips/Payroll Report
Bank Statements
Letter
Verbal
Self
Other (complete comments)

Location of evidence
s 47E(d)/Notes

s 47E(d)
Customer Paper File   Select this if you were provided a link to a PDF of the Customer's Paper File.

Good Morning A l

Please find below this weeks Income Apportionment Samp ing Report for week ending 19 January 2024.

Income Apportionment Sampling Report for week ending 19 January 2024

Cohort	POST QA CUMULATIVE TRIAGE OUTCOMES						POST QA CUMULATIVE RECALCULATION OUTCOMES					
	Total records reviewed	Related to employment income	Impacted by income apportionment	Sufficient evidence for recalculation	AVG Investigation Time (h:mm)		Recalculations completed	Downward Variations	Upward Variations	Arrears	NIL Change	AVG Recalculation Time (h:mm)
Determined Debts/AAT	944	876 (93%)	463 (53%)	298 (64%)	01:10		235	153 (65%)	64 (27%)	8 (3%)	10 (4%)	03:38
Arrears	945	45 (5%)	13 (29%)	6 (46%)	00:35		2	1 (50%)	1 (50%)	0 (0%)	0 (0%)	00:30

Staffing
- Of the 35 ident fied staff an average of 16 participated in sampling each day
- As inflow of files slows there are ongoing discussions with PAO Appeals and ITB regarding staff continuance/transition back to other priority work.

Insights
- All sampling records have been allocated
- We have received 802 of the paper f les
  - 91 paper files remain
- 1 889 records have been sampled including the Quality Assurance component
  - 107 AAT decisions have been sampled
  - 837 determined debts have been sampled
  - 945 arrears records have been sampled
- 502 triage records have been selected for QA checking
  - 463 records have been QA checked with 65% accuracy
- 377 recalculated records have been selected for QA checking
  - 252 records have been QA checked with 55% accuracy
- 161 arrears records have been selected for QA checking
  - 119 records have been QA checked with 90% accuracy
- 21 staff from the 35 who are undertaking IA sampling have achieved triage proficiency.
  - Note: number has not varied from last week number now excludes staff who returned back to nominal areas.

Determined Debt Outcomes (post QA checks)
- 837 debts have been reviewed in total
- The average time for the investigation component: 1:12 (h:mm - staff declared timings)
- The average time for the recalculation component: 3:39 (h:mm - staff declared timings)
  - 796 (95%) of the 837 determined debts reviewed so far are related to employment income
- Of the 796 determined debts related to employment income:
  - 399 (50%) were income apportioned
  - 263 (66%) have sufficient evidence available on the record to conduct a recalculation
- 209 recalculations have been completed:
  - 135 (64%) resulted in a downward variation:
    - Average $185.48 (or 35% of the debt value)
    - Median $88.79
    - Average duration of debt period is 141 days. Note: debts occurred within this period but not necessarily across the whole period.
    - Highest reduction was $1816.59
    - Lowest reduction was $0.01
  - 58 (28%) resulted in an upward variation:
    - Average $114.92 (or 49% of the debt value)
    - Median $28.82
    - Average duration of debt period is 213 days. Note: debts occurred within this period but not necessarily across the whole period.
    - Highest increase was $1220.06
    - Lowest increase was $0.01
  - 8 (4%) resulted in arrears:
    - Average $488.65
    - Median $165.22
    - Highest arrears were $3643.42
    - Lowest arrears were $269.17
  - 8 (4%) resulted in a NIL change.
- The longest calculation took 7:12 (h:mm).
- The high-level basis for the calculations is as follows:
  - 5 (2%) - Daily rate – daily earnings method which calculates the debt using the exact days and daily amounts paid in the relevant Centrelink Entitlement period
  - 192 (92%) - Received method – date paid method which calculates the debt using the total income paid in the relevant Centrelink Entitlement period
  - 12 (6%) - Hybrid – a mixture of daily earnings and date paid methods; could also include the use of bank statements to confirm date paid
Note: a recalculation is only conducted where there is evidence available for the full debt period. Where any information is missing it is deemed insufficient evidence is available.

AAT Decisions (post QA checks)
- 107 debts have been reviewed in total
- The average time for the investigation component: 0:55 (h:mm - staff declared timings)
- The average time for the recalculation component: 3:27 (h:mm - staff declared timings)
  - 80 (75%) of the 107 determined debts reviewed so far are related to employment income
- Of the 80 determined debts related to employment income
  - 64 (80%) were income apportioned
  - 35 (55%) have sufficient evidence ava lable on the record to conduct a recalculation
- 26 recalculations have been completed:
  - 8 (69%) resulted in a downward variation:
    - Average $787.32 (or 26% of the debt value)
    - Median $456.06
    - Average duration of debt period is 476.375 days. Note: debts occurred within this period but not necessarily across the whole period
    - Highest reduction was $3014.72
    - Lowest reduction was $10.33
  - 6 (23%) resulted in an upward variation:
    - Average $135.70 (or 6% of the debt value)
    - Median $151.68
    - Average duration of debt period is 226 days. Note: debts occurred within this period but not necessarily across the whole period
    - Highest increase was $212.39
    - Lowest increase was $22.16
  - 2 (8%) resulted in a NIL change.
- The longest calculation took 10:00 (h:mm).
- The high-level basis for the calculations is as follows:
  - 2 (8%) - Daily rate – daily earnings method which calculates the debt using the exact days and daily amounts paid in the relevant Centrelink Entitlement period
  - 20 (77%) - Received method – date paid method which calculates the debt using the total income paid in the relevant Centrelink Entitlement period
  - 4 (15%) - Hybrid – a mixture of daily earnings and date paid methods; could also include the use of bank statements to confirm date paid
Note: a recalculation is only conducted where there is evidence available for the full debt period. Where any information is missing it is deemed insufficient evidence is available.

Arrears Outcomes (post QA checks)
- 945 arrears have been reviewed in total
- The average time for the investigation component: 0:35 (h:mm - staff declared timings)
- The average time for the recalculation component: 0:30 (h:mm - staff declared timings)
  - 45 (5%) of the 945 determined debts reviewed so far are related to employment income
- Of the 45 determined debts related to employment income 29% were impacted by income apportionment:
  - 13 (29%) were income apportioned
  - 6 (46%) have sufficient evidence ava lable on the record to conduct a recalculation
- 2 recalculations have been completed:
  - 1 (50%) resulted in a downward variation:
    - Average $10.42 (or 4% of the debt value)
    - Median $10.42
    - Average duration of debt period is 27 days. Note: debts occurred within this period but not necessarily across the whole period
    - Highest reduction was $10.42
    - Lowest reduction was $10.42
  - 1 (50%) resulted in an upward variation:
    - Average $20.37 (or 25% of the debt value)
    - Median $20.37
    - Average duration of debt period is 41 days. Note: debts occurred within this period but not necessarily across the whole period
    - Highest increase was $20.37
    - Lowest increase was $20.37
- The longest calculation took 0:30 (h:mm).
- The high-level basis for the calculations is as follows:
  - 0 (0%) - Daily rate – daily earnings method which calculates the debt using the exact days and daily amounts paid in the relevant Centrelink Entitlement period
  - 2 (00%) - Received method – date paid method which calculates the debt using the total income paid in the relevant Centrelink Entitlement period
  - 0 (0%) - Hybrid – a mixture of daily earnings and date paid methods; could also include the use of bank statements to confirm date paid
Note: a recalculation is only conducted where there is evidence available for the full debt period. Where any information is missing it is deemed insufficient evidence is available.

Jason Kallus

National Manager

▸ **INTEGRITY TRANSFORMATION BRANCH**
PAYMENT ASSURANCE PROGRAM & APPEALS

Mobile   s 47F(1)

I would l ke to acknowledge the traditional custodians on whose and I wa k work and ive.

I was born on Kamilaroi country work on Awabakal country and ive on Warimi country.

1. Income Apportionment – Sampling Activity 2

Prior to the implementation of the Change of Assessment Model (CAM) on 7 December 2020, where a person's employment period and their social security period did not align, and there was limited information to indicate employment income was earned in a particular instalment period, earned income would be apportioned across social security instalment periods.

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On 25 October 2023, the Commonwealth Ombudsman wrote to Services Australia (the agency) to provide their draft report into income apportionment administration. This report sets out the findings of the Ombudsman's second investigation which focusses on the remediation of cases affected (or potentially affected) by income apportionment and included 10 recommendations.

Recommendation 1 requested the Agency to develop a strategy for sampling potentially affected historic debts, underpayments, AAT decisions and CDPP referred debts. The Ombudsman requested that the sample be:

- Statistically significant in size;
- Provide a high rate of confidence; and
- Include a range of payments across a range of years between 2003 to 2020.

The sampling activity that was finalised on 11 October 2023 did not meet the requirements of the Ombudsman recommendations, therefore the Agency accepted this recommendation and commenced a second sampling activity from 15 November 2023.

2. Key Messages

What is income apportionment?

It's a practice the agency used to evenly divide, or apportion, a customer's employment income across two or more Centrelink Entitlement periods.
We only divide a customer's income evenly if:
- Their employer pay period didn't line up with the customer's fortnightly Centrelink reporting period, and;
- the payslip or income report showed total earnings but did not show which days were worked or how much was earned in each Centrelink fortnight, and;
- We had no other information available.

What income apportionment is not

- Customer self-declared earnings where (including but not limited to):
  - ➢ There is no evidence the customer's payslips used to report the income;
  - ➢ There was no staff intervention in completing update;
  - ➢ Payslip period declared aligns with customer Centrelink Entitlement period.
- Customer has ongoing regular earnings, and the payslip information verifies income.
- Evidence that the daily rate from payslip was used to update and verify income.

To help us further understand how income apportionment has impacted debt/underpayment calculations, we have been requested to undertake a second sampling activity. This is again, a comparative exercise between income apportionment and Daily earnings and/or Date paid method.

Staff will only be recalculating the debts/underpayments based on earnings information already available on the customer's record and recalculations will be undertaken via Multical only. All other coding not related to earnings update will remain unaltered and included as is, in the recalculation.

The following support structure and materials have been developed to assist staff when undertaking this exercise:

- Support Structure:
    - QDOs – For staff to escalate technical queries
    - Integrity Process Design mailbox and Teams Channel – For operational leadership to escalate queries that they are unable to resolve.
- a taskcard detailing the steps required and relevant examples; and
- a data capture template with drop-down boxes to support accurate and consistent recording of findings.

An FAQs will also be developed as trends arise.

3. Stakeholder Engagement and Communication Plan

Internal agency Stakeholders

Stakeholder Group	Engagement type	Engagement level	Engagement method Communication Channel	Information Needs	Engagement Activity	Responsible role	Frequency	Due by	Status
National Managers, ITB and PAOB	Manage closely	Empower	• Operational Report • Weekly Report • Final Report • Emails • Virtual Meetings	• Operational reports detail staffing, records completed, records checked and quality trends. • Weekly report builds on the operational report, adding insights and trends on records sampled to date. • Final report summarises outcomes of Sampling Activity 2 and also details approach taken and recommendations. • Awareness of risks requiring escalation needed. Notify immediately when issues are identified.	• Clearance of reports, prior to further distribution. • Risk and Issue registers	• Sampling Activity Leads	• Daily – Operational Report • Weekly – Weekly Report • As required – Risks and Issues	Ongoing	In progress
ITB Project Team	Keep informed	Involve	• Virtual stand-up meetings • Emails • Teams Channel	• Awareness of Activity status (records completed and checked) and trends identified. • Awareness of risks and issues impacting Sampling Activity 2.	• Attendance at meetings • Feedback loops	• Sampling Activity Leads	• Daily – virtual stand-up meetings, Teams channel • As required - emails	Ongoing	In progress
Operational Leadership, PAOB	Keep informed	Involve	• Virtual stand-up meetings • Emails • Teams Channel	• Awareness of Activity status (records completed and checked) and trends identified. • Awareness of risks and issues impacting Sampling Activity 2.	• Walkthrough of process • Attendance at meetings • Feedback loops	• Sampling Activity Leads	• 13/11 - walkthrough • Daily – virtual stand-up meetings, Teams channel • As required - emails	Ongoing	In progress
Operational staff, PAOB	Keep informed	Inform	• Virtual meetings • Emails	• Awareness of Activity status (records completed and checked) and trends identified. • Awareness of risks and issues impacting Sampling Activity 2.	• Walkthrough of process • Feedback loops via local stand-up meetings	• Sampling Activity Leads • ITB Project Team • Operational Leadership, PAOB	• 14/11 to 16/11 – walkthrough • Daily – feedback loops	Ongoing	Complete