

Ethical Billing of Support Hours in the NDIS Policy

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This policy sets expectations for ethical, accurate, and transparent billing of NDIS-funded Positive Behaviour Support at Insight PBS. It applies to all staff and contractors and supports compliance with NDIS rules while protecting participant funding through clear documentation and oversight.

External source link:

<https://www.ndis.gov.au/providers/pricing-and-payments/pricing/pricing-arrangements-and-price-limits>

Governing regulations for this policy



National Disability Insurance Scheme (NDIS Behaviour Support Practitioner Application) Guidelines 2020



NDIS (Code of Conduct) Rules 2018 (Cth)



NDIS (Restrictive Practices and Behaviour Support) Rules 2018 (Cth)

Managing business unit for this policy



Clinical

1. Purpose

The purpose of this policy is to set clear expectations for the **ethical** billing of support hours under the National Disability Insurance Scheme (NDIS), ensuring that all claims are accurate, transparent, represent value for money for participants, and comply with NDIS Pricing Arrangements and Price Limits and relevant NDIS Rules.

2. Application

This policy applies to all employees and contractors who undertake work that may be billed to NDIS participant plans under this organisation's NDIS registration groups, including but not limited to Behaviour Support Practitioners.

3. Policy

- Insight PBS requires that all support hours claimed to the NDIS:
 - Accurately reflect the actual work performed for a specific participant and demonstrate a clear contribution to the supports provided and the participant's goals, behaviour support plan, and outcomes;
 - Align with the current NDIS Pricing Arrangements and Price Limits and relevant NDIS Rules;
 - Are supported by clear, contemporaneous documentation and auditable records sufficient to evidence the service delivered and its relevance to identified needs, goals, and outcomes.
 - Reflect the principle of "nothing about the participant without the participant," ensuring that supports, decisions, and work undertaken are informed by, and where appropriate involve, the participant and/or their nominated

representatives.

The Insight PBS prohibits fraudulent, inflated, unnecessary, non-evidence-based, or otherwise misleading claims and will treat any confirmed noncompliance as a serious misconduct matter, which may also constitute a reportable matter to the NDIS Quality and Safeguards Commission or other regulators.

3.1 Definitions

- **Billable support time:** time spent delivering activities that meet NDIS rules and item descriptors, including planning, consultation with the participant and their support system, assessment, plan development, implementation support, and training directly related to the participant's goals and behaviour support plan, and are reasonably necessary and directly related to the participant's NDIS plan goals.
- **Underbilling:** failing to claim for time legitimately spent on billable activities i.e. charging less than the amount that should have been billed for the services actually provided.
- **Overbilling:** claiming for time not actually worked, or for activities that do not meet NDIS claiming rules i.e. charging more than the amount that should be billed for the services actually provided.

3.2 Principles of Ethical Billing

Ethical billing is underpinned by the following principles:

- Fairness to participants: Claims must represent value for money and protect participant funding from misuse.
- Integrity towards the NDIA: Claims must be truthful, accurate, and consistent with NDIS requirements.
- Fairness to the Insight PBS: Practitioners are expected to accurately claim for billable work performed so the organisation remains financially sustainable.
- Fairness to PBS practitioners: Practitioners are expected to accurately claim for billable work performed to ensure their work is valued fairly, regardless of experience, disability, or work style.

3.3 What Is Billable Support Time?

Subject to NDIS rules and relevant item descriptors, and where activities are directly related to the participant's assessed needs and goals, the following activities are billable when they are directly related to the delivery of Positive Behaviour Support or other approved supports:

- Direct support time with the participant;
- reviewing participant documents (e.g. reports, assessments, plans, emails);
- writing support-related emails to stakeholders;
 - case noting, with time proportionate to the activity;
 - researching diagnoses, comorbidities, strategies, medications, or Restrictive Practices relevant to the behaviour support plan;
 - report writing. (drafting, updating, and finalising Behaviour Support Plans and related clinical documentation);
 - liaison/ communication with stakeholders (making or receiving calls to understand behaviour, context, or to inform planning and appointments and Care Team Meetings (including cancellation within the cancellation window when alternate billable tasks cannot reasonably be completed);
 - developing resources and materials for stakeholder training;
 - delivering training to participant stakeholders in line with the behaviour support plan;
 - travel time in line with NDIS Pricing Arrangements and Pricing limits. (<https://www.ndis.gov.au/providers/price-guides-and-pricing>)

3.4 What is not Billable

The following activities must not be billed to participant plans:

- Work not related to a specific participant or their plan (e.g. general professional development, supervision, company team meetings);
- time not actually worked (e.g. rounding up to meet targets, claiming for breaks).
- activities explicitly excluded by NDIS guidance or item descriptors.
- corrective work required due to practitioner error or non-compliance, unless explicitly permitted by NDIS rules.

3.5 Requirements for Practitioners

Practitioners must:

- Accurately record and bill all time spent on billable activities on the CRM, neither overstating nor understating time in line with NDIS Practice Standards requirements for documentation and record-keeping.
- Maintain contemporaneous and complete case notes that clearly link billed time to activities and outcomes.
- Use organisational systems as required and in line with documented processes.
- Seek guidance from their Team Leader where they are unsure if an activity is billable, or if they have concerns about the amount of time required.

3.6 Workload and Sustainability

Practitioners must accurately bill all time spent on billable activities, avoiding both Overbilling and Underbilling. The Practitioner role also includes non-billable responsibilities, such as administrative time, professional consultation, documentation, and professional development. Billing must always accurately reflect work actually performed and comply with NDIS Pricing Arrangements and Price Limits. Practitioners who consider that their workload or billed hours require them to work beyond their ordinary hours on a regular basis are expected to promptly notify their Team Leader so that caseload allocation, priorities and other supports can be discussed.

3.7 Systems, Controls, and Oversight

To prevent and detect unethical billing and to support compliance with NDIS Practice Standards and Quality Indicators, the organisation will maintain the following controls:

- **Scheduled audits:** Regular audits of billed hours, case notes, and documentation, recorded in a central audit register.
- **Escalation for missed audits:** Any missed audit or significant delay is escalated to the next level of management for review and follow-up.
- **Second line assurance:** Periodic independent reviews (e.g. by Quality, Risk, or Governance functions) to test the effectiveness of billing controls
- **System checks:** Reasonableness and plausibility checks (e.g. maximum daily billable hours, travel logic, overlapping appointments) via the CRM or reporting tools.
- **Governance reporting:** Regular reporting of audit completion, exceptions, and corrective actions to the executive team.
- **Regular file reviews:** Conducted by the Team Leaders

All relevant staff will receive induction and refresher training on ethical billing, NDIS claiming rules, documentation standards, and the use of organisational systems.

Training will include:

- Practical examples of billable and non-billable activities.

- Expectations for case notes and record-keeping.
- How to raise concerns or seek clarification.

3.8 Roles and Responsibilities

- Practitioners: Comply with this policy, accurately record and bill activities/ time, and promptly raise concerns about billing practices.
- Team Leaders / Clinical Managers: Provide supervision, monitor billing patterns, complete scheduled audits, and respond to anomalies or concerns.
- Quality / Risk / Governance: Maintain the audit schedule, track completion, perform second-line reviews, and report to the executive.
- Executive: Oversee the effectiveness of billing controls and respond to material risks or incidents and ensure systemic issues are addressed through the organisation's quality and risk management systems in line with NDIS Practice Standards.

3.9 Responding to Concerns and Incidents

Any staff member who identifies, or suspects, unethical or incorrect billing must report this to their Team Leader.

Reported concerns will be:

- Logged and triaged for risk with the Operations Manager.
- Investigated promptly and confidentially.
- Addressed with corrective actions, this may include liaising with the affected participant/nominee, refunding the NDIA/participant where required, and strengthening controls.

Substantiated fraudulent billing may result in disciplinary action up to and including termination. Incidents meeting the definition of reportable incidents under the NDIS (Incident Management and Reportable Incidents) Rules 2018 will be notified to the NDIS Commission in accordance with those Rules. Other significant non-compliance may be notified to the NDIA or other relevant authorities as appropriate.

4. Breaching this Policy

Breaches of this policy may result in disciplinary action up to and including termination of employment or engagement, and where appropriate, notification to external authorities or regulators.

5. Variations

Insight PBS reserves the right to vary, replace or terminate this policy from time to time.

6.0 Associated Documents

- Code of Conduct
- Privacy Policy and Framework
- NDIS Pricing Arrangements and Price Limits