

The Department of Education, Skills and Employment

Exposure Draft for the New Employment Services Model 2022
Purchasing Arrangements

Response submitted by:

MAX Solutions

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New Employment Services Model Response to the Exposure Draft

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Thank you for the opportunity to provide feedback on the New Employment Services Model 2022 Purchasing Arrangements. MAX Solutions would like to make the following recommendations:

Ten per cent national business share cap

Exposure Draft Section 2.2.10 National business share tolerance

This section states a proposed maximum cap of 10 per cent of total national business share for any single Provider.

The stated rationale is to encourage and support diversity in the market.

The Department may believe this still gives flexibility to increase as the Exposure Draft also states:

- the operation of the cap will be subject to an upper tolerance; and
- the application will be weighed against the need for high quality Providers and coverage in regional areas.

Issues:

- Any hard-coded provision in the final RFP document, such as a 10 per cent cap, will need to be adhered to through the purchasing process
- Government will need to abide by this cap regardless of whether it is in the best interests of the Commonwealth or whether the result provides best value for money including viable regional coverage
- Potentially having to allocate business to lesser value providers purely to meet this arbitrary cap presents a potential risk to the Commonwealth
- The cap will potentially distort prospective tenderer considerations in terms of decisions to bid for business including metro/region and site coverage and not result in the best offering to Government
- The concepts of “capacity to deliver” used in all employment service purchasing processes since 1998 is potentially a more flexible provision
 - o This involved a review involving *“consideration of each Tenderer’s financial and organisational capacity to deliver the relevant Services at the allocated level, and maintain the required quality of service delivery and any risk exposure for the Government”*
 - o It was especially considered in the context of significant expansion - size or footprint
- Some providers, in the existing jobactive market, are already above the proposed 10 per cent cap for the new market
- There is little evidence to support the proposition that small providers perform better than large providers

- An assumption that a market with small providers will perform exceptionally well across all regions is not substantiated with evidence, in fact the evidence is to the contrary
- The Personal Support Program (PSP), disbanded in 2009 due poor outcomes for job seekers and absorbed into what is now the Stream C cohort, was primarily delivered by small providers
- A cap will potentially dilute provider and overall market viability if business allocation decisions are made to retain or allocate to a provider across multiple regions but dilute their business share to keep them under the cap
- An arbitrary predetermined cap is potentially detrimental to a competitive process
- In support of this it is worth noting that the jobactive RFT stated: *“Value for money is the core principle underpinning Government procurement and it is enhanced by.....encouraging competitive and non-discriminatory processes”*
- Section 6.5, Stage 4 – Value for money and recommendations states: *“....In the case of the RFP for the new employment services, the department’s assessment of value for money may include but not be limited to:.....diversity, scope and viability of the Provider market..... diversity of Providers to encourage competition and innovation in the delivery of the Services...”*
- The concept of “diversity” is not defined within the documentation. All employment service purchasing processes since 1998 have clearly included statements such as *“It is expected that there will be a mix of Employment Providers across Australia, including for profit and not-for-profit organisations”*

Coverage

- Section 5.4 of the RFP which provides detail on Coverage states: *“It is not necessarily expected that all Providers would deliver the respective Service across an entire ER. This means Respondents to the RFP may elect to deliver Services within an area smaller than an ER, even from a single site if appropriate.”*
- While it is up to each organisation to make judgements on service models and viability it could be viewed that this approach favours the business models of smaller providers
- In contrast the jobactive RFT was more balanced, stating: *“The Department is seeking market coverage that is as wide as possible. Preference will be given to tenders that geographically cover all of an Employment Region, however, while needing to also ensure the whole Employment Region is covered, the Department will consider Bids that offer partial coverage”*
- It is not clear that the cap relates only to the Enhanced Services licence or incorporates other programs under NESM such as EST and CTA.

Recommendation:

In the interests of a competitive, non-discriminatory and flexible process providing the best opportunity for the Commonwealth to achieve value for money it is proposed that:

1. The cap be removed and replaced with a capacity to deliver consideration; or
2. The cap be increased to 15-20% noting this would still be a long way from producing an outcome that could include a mix of larger, medium and smaller providers with national, state, local, ER or site allocations based on their preferences and governments' need for diversity and coverage.

Servicing large employers

Exposure Draft Appendix 1, 1.8 Services to employers

This section states

“Enhanced Services Providers are expected to have a comprehensive strategy for engaging with and supporting employers in the locations in which they are licensed to deliver services.”

*“For employers and industry groups seeking support with larger recruitment needs, **the department will triage assistance and coordinate a package of support** including through tailored projects delivered by Workforce Specialists. Assistance will continue to be available in the new model to respond to large employer or industry closures, which may include structural adjustment programs, tailored Jobs Fairs and local Employment Facilitators.”*

Issues:

- It can be perceived that the Department is being overly interventionist and potentially discouraging providers to service large and/or national employers.
- Some providers have proven and effective models to meet the needs of large national employers as well as local employers and this should not be discouraged but be rewarded

Recommendation:

It is proposed that:

3. The RFP wording include reference to providers potentially working with large and national employers with larger recruitment needs not just locally based engagement.

Performance management

Exposure Draft Appendix 1, 1.2.1 Module based approach to performance

The Exposure Draft provides some broad information on the use of a module-based approach to performance, including the potential use of quantitative and qualitative measures.

The Draft Deed identifies five areas in which provider performance will be assessed against KPIs. The five areas identified are:

- achieving sustained Employment for Participants
- progressing Participants towards Employment
- quality of service
- quality of employer service; and
- Licensing requirements.

The Exposure Draft also states *“The use of different types of performance assessment aims to reward Providers that deliver services consistent with the full policy intent of Enhanced Services”*.

Issues:

- While the framework is clear there is minimal detail or clarity on precisely what providers will be held to account on.

Recommendation:

It is proposed that:

4. The underpinning measures that are eventually specified are as simple as possible and focus on outcomes and outputs rather than administrative processes
 - a. In this context it is worth noting that the proposed flexibility and lack of administrative complexity being proposed for the TTW program, for the stated aim of achieving high performance should also be a clearly stated policy or program setting for Enhanced Services
5. Prior to Contract commencement clear performance measures be specified and communicated, noting the first proposed Licence review process is a mere 15 months after Contract commencement.

Enhanced Services v Transition to Work (TTW)

We are not disputing the need to have a specialist youth program that focuses on young people at risk, in fact it is consistent with the service delivery model MAX adopted in jobactive, partnering with Yourtown, a youth specialist and TTW provider.

However, we are concerned that the new Enhanced Service delivery model should be administered and funded in a similar way to TTW.

The division of digital and enhanced servicing was designed to move more resources to those that need it most – the long term unemployed and job seekers who have more barriers to finding and keeping a job.

Table 7.5 of the recent TTW Evaluation Report details the average cost per labour market attachment, study outcome and positive outcome for TTW and jobactive. While a footnote to the table provides a caveat that the results should not be interpreted as representing total program unit cost, especially for jobactive, the data demonstrates the stark contrast of the funding and investment made available to TTW participants compared to those in jobactive. That is, labour market attachment unit cost of \$3,201 for jobactive versus \$9,975 for TTW.

Issues:

- Job seekers who have been unemployed for long periods, those with disability or mental health conditions, ex-offenders, homeless who are over the age of 25 will continue to be treated differently to those under 25 and eligible for TTW. Enhanced Services job seekers are subject to Points Based Activation, Mutual Obligation and the Targeted Compliance Framework that providers are required to enforce as a condition of licensing.
- Currently if youth participating in TTW don't fully participate their penalty is to return to jobactive, setting up two classes of service. Most jobactive providers deliver quality services and achieve great outcomes within a rigid compliance driven model.
- Upfront payments to providers of Enhanced Services are minimal and the Employment Fund is subject to red tape. The settings for TTW are more flexible, permit early intervention and investment in job seeker capability without detriment to performance management.
- Youth are getting preferential treatment over other cohorts that face just as significant barriers – this is particularly apparent for the rapidly growing number of mature age job seekers and the very long term unemployed.

Recommendation:

It is proposed that:

6. The flexibility and reduced administrative complexity being proposed for the TTW program with the stated aim of achieving high performance be implemented as program settings for Enhanced Services.

Program Funding

The 'New Employment Services Model Financial Viability Analyses—Summary of Findings' paper containing analysis from KPMG notes the following:

“While monthly expenses exceed revenue for the first nine months, Engagement Payments paid for transition job seekers and the increasing number of Employment Outcomes achieved from month 12 onward increase revenue and result in positive monthly results from month 13 until the end of the ten year period.”

“It is important to note there are limitations as the analyses were conducted during a period of unprecedented change in the labour market and economy due to the effects of the bushfires, floods and COVID-19. It was therefore necessary to rely more heavily on historic jobactive administrative data than originally anticipated.”

Table 1 includes a range of assumptions for a representative organisation, including:

Assumption: Monthly Commencements

Value: 320 as a baseline but higher in Year 1, 2 and 3 to reflect 10-year Department forecast

Basis: 3-year average jobactive data (2015- 19) with an escalation in Year 1, 2, and 3 to maintain consistency with Treasury forecasts of new commencements.

This results in an increase in new commencements of 19%, 7% and 1% in the first three years before returning to long-run average commencements in Year 4.

Assumption: Caseload

Value: 2,780 – average over 10 years

Basis: Based on Treasury forecasts for system-wide caseload over time.

Issues:

- The modelling is based on pre-COVID and bushfire data which makes sense but presents a concern that by the 1 July 2022 that economic, labour market and community circumstances will return to a steady “normal” state
- The modelling assumes a huge and unexplained 19% surge in year 1 commencements
- The modelling, despite the spike in year 1 commencements, points to loss making in the first 13 months (almost half the initial 3 year Licence term)
- The overall modelling including caseload averages project over a 10 year period – the potential for vast variability in factors across this period is a concern
- Enhanced Services are funded at a rate 2-3 times less than TTW while both serve disadvantaged cohorts

Recommendation:

It is proposed that:

7. The financial modelling is based on historical data from a pre-COVID period, with an assumption that we will return to this environment at some point in time. Over the 10-year projection period, Enhanced Services funding need to be reviewed at least every three years to ensure ongoing viability
8. Enhanced Services need funding that recognises the complexity of the caseload (TTW is funded at a rate of 2-3 times greater) and flexibility to allow upfront early intervention.

Weightings for Capability Criteria

Exposure Draft, Section 6. Evaluation of responses, 6.3 Stage 2 – Assessment against capability criteria

The Exposure Draft states:

“Respondents to the RFP will be required to respond to targeted questions relating to relevant areas of capability. The series of questions relating to each area of capability will be finalised for the RFP, however, the department anticipates the key areas of capability to be evaluated will focus broadly on the following three categories and be similar to those expressed in section 5.5.1 Areas of capability by category.”

“In assessing the responses, the department may consider all information contained in a response and any other relevant information available to it. The department will use all available relevant past performance data, including:

- outcomes, quality and compliance performance data held by the department and performance data provided by the Respondent*
- referees to validate claims against performance, including claims citing other government (state, territory and Commonwealth) funded programs and services.”*

Issues:

- The Exposure Draft does not provide detail on whether a response in relation to past performance will be required and what that may entail
- The Exposure Draft does not provide any detail as to the weighting to be attributed to each capability criterion, nor an opportunity for industry input on any such weightings

Recommendation:

It is proposed that:

9. Transparency be provided in the RFP as to the respective weighting to be attributed to each capability criterion
10. Transparency be provided in the RFP in relation to how past performance will factor into evaluation decisions and what information tenders are required to provide.

Regional Loading

The 'New Employment Services Model Financial Viability Analyses—Summary of Findings' paper containing analysis from KPMG notes:

“.....data analysed did not identify regional cost differences. The analysis shows that some of the perceived difference in viability between regional and metropolitan providers can be explained by the lower relative jobseeker volumes in regional areas.”

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Question 5.29: Is there a regional loading for Enhanced Services payments?

Answer: No. There is no regional loading in the Provider payment structure under the new model. The department found that there is no substantive evidence demonstrating that a regional loading is required. jobactive outcome data does not indicate significant differences in the proportion of full outcomes achieved in metropolitan and regional areas. There is also significant variability in the strength of labour markets across metropolitan and regional areas

Question 5.30 Is regional loading applied to the Employment Fund?

Answer: No. The department commissioned an independent financial viability analysis which was unable to identify any consistency in regional cost differences and found varying viability across metropolitan and regional areas.

Issues:

- It is noted that the Exposure Draft does not make reference to regional service delivery
- KPMG note a “perceived” difference in viability is due to lower job seeker volumes in regional areas. From experience, we observe this is an actual contributing factor to viability. In the absence of clear information on how job seeker volumes would or could be addressed we consider this risk to viability in some regional areas will still exist
- We note the response to FAQ 5.29 observes that “*jobactive outcome data does not indicate significant differences in the proportion of full outcomes achieved in metropolitan and regional areas*”. It is, however, not clear how this demonstrates that regional areas are as viable as metropolitan locations.

Recommendation:

11. It is proposed that Regional loadings be reinstated to ensure overall viability of the market and that of those providers/potential tenderers dedicated to the delivery of high-quality services across regional communities.

Employment Fund

Exposure Draft Appendix 1, 1.11 Employment Fund

This section states:

The Employment Fund is a pool of funds that can be used by Enhanced Services Providers to support job seekers. Providers should proactively help job seekers to prepare for work and build their experience and develop skills to meet the needs of employers and their current job vacancies.

Employment Fund credits can be used by Providers to access the services that job seekers need. The flexibility of the Employment Fund enables assistance to be targeted to individual job seeker circumstances, employer requirements and changing labour market conditions in their local regions.

Exposure Draft for the New Employment Services Model 2022 Purchasing Arrangements Frequently Asked Questions Version 3

Question 5.51: Can the Employment Fund be used to pay for training provided by the Provider or a related entity?

Answer: Further detail on the types of support available in the Employment Fund will be provided in due course.

Issues:

- It is noted that the Department will expect a range of services and supports to form part of Enhanced Services Provider service offers. These are, however, more specialised services that will not be possible or viable to deliver without additional funding options, these include allied health services and some training delivery
- Prospective tenderers will build their service and business models around available and potential supports for job seekers, potential funding sources need to be clear through the RFP to ensure viability and quality of proposals
- Health services and supports:
 - o There is strong demand for mental health services among jobactive (prospective Enhanced Service) job seekers
 - o Many providers report facing considerable challenges accessing support services for their job seekers
 - o Shortages of mental health places in the community mean some job seekers do not receive the support they need
 - o Where a service is available, places are often limited and oversubscribed
 - o Access to allied health service funding through the Employment Fund is critically important to build capacity and support disadvantaged job seekers progress towards employment
 - o Some employment service providers have an in-house health team capability providing triaged case management support. Others access

this from third party providers. Either way these options provide efficient and effective access to services that can otherwise be out of reach or unavailable for many job seekers

- Delivering training to job seekers on your own caseload provides many benefits to the job seeker including an already established relationship and understanding, easy scheduling at the most appropriate time taking account of their goals and preferences, and convenience of location improving attendance and completion rates.

Recommendation:

It is proposed that:

12. The types of support and services available in the Employment Fund be clear in the RFP. This will enable prospective tenderers to develop their service and business models and offering to Government in an informed manner
13. Flexibility to provide job seekers with health and training services and supports through their own organisation or a related entity continue to be permitted via the Employment Fund.

Work for the Dole fees and flexibility

Exposure Draft Appendix 1, 1.6.3 Referral to activities, Table 8

The Exposure Draft states in relation to Work for the Dole:

Activity cost

Placements – *payments will be a fixed fee of \$500 per job seeker commencement, split between the Provider and Host Organisation to cover the upfront costs of commencing a job seeker in the activity.*

Projects – *To support the delivery of these activities, Enhanced Services Providers will be allocated a budget within the department's IT system to be drawn down on the agreement of a suitable activity and cost.*

Issues:

- The \$500 fee is half the \$1,000 available now, but Providers are expected to deliver strengthened WFD that incorporates the achievement of core competencies and lower complexity qualifications
- The new fee will make the sourcing and management of many activities unviable
- The rigid requirement for the fee to be split 50/50 with the Host Organisation will be a massive barrier to availability and diversity of WfD activities
- Experience over the last 6 years has shown that providers and Hosts are able to work maturely and professionally together to agree on mutually agreeable terms satisfactory to both parties – these terms vary depending on the Hosts circumstances and the activity in question

Recommendation:

It is proposed that:

14. The \$1,000 fee amount be reinstated
15. Hosts and providers retain the flexibility to negotiate and agree on mutually agreeable terms.

Points Based Activation System

Exposure Draft Appendix 1, 1.61.1 Points Based Activation System, Table 6

The Exposure Draft states in relation to the PBAS:

Tasks and Activities	Points
Completing a quality job application	5 points
Attending a job interview	10 points
Starting a job	10 points
Education and Training, including JobTrainer funded courses	30 points per month while studying
Paid work	5 points per 10 hours worked
Work for the Dole	30 points per month while participating
Creating or updating their career profile	5 points (once per month only)

Issues:

- With Points Based Activation Work for the Dole (WFD) and training are given high values to encourage participation. Non-accredited training should also be given a value. Non-accredited training is important in improving a job seeker's skills and their participation should be recognised through the PBAS.
- Participation in EST or CTA are not specified in the table above and we believe they should receive the same points as WFD and Education and Training
- There are no points allocated for work experience (paid or unpaid), PaTH Internships or NWEF. These are important activities to improve employability skills and progress a job seeker towards employment.

Recommendation:

It is proposed that:

16. Participation in programs such as EST and CTA are specifically recognised in the PBAS with appropriate point allocations. We suggest this is at the same level as WFD and Training.
17. Non-accredited training is included in the PBAS
18. Work experience including NWEF and PaTH internships are included as an activity in the PBAS

Employability Skills Training

Exposure Draft Appendix 2, 2.5 Payments to providers – Employability Skills Training

The Exposure Draft states

“...It is the department’s intention that an additional \$250 per young Participant in Digital Services is payable on commencement in a PaTH Internship placement following participation in a Training Block 2 course. This payment is in recognition of the work undertaken by the EST Provider to source PaTH Internship placements.”

Issues:

- Understanding the needs and preferences of a Digital Services participant and then sourcing a suitable EST placement including organising the appropriate risk assessment and host agreement can be a significant time investment for a provider.
- The proposed EST Placement Payment of \$250 does not cover the time and costs of a Provider to organise the placement.
- In comparison, similar work and time is involved in organising PaTH internships or NWEF placements and Providers are being paid a \$1,000 fee. This is inconsistent and may result in Providers not being able to offer placements to Digital Services participants.

Recommendation:

It is proposed that:

19. The EST Placement Payment of \$250 be increased to consider the work involved in organising placements for Digital Services participants.

Exposure Draft Appendix 2, 2.5 Payments to providers – Employability Skills Training

The Exposure Draft states:

“Participants in DES, TTW or Enhanced Services can be placed in EST on a fee for service basis.”

“It is also the department’s intention that Enhanced Services, TTW and DES Providers may also deliver EST services, however, they will not be able to refer job seekers from their own caseload or their related entity to any EST courses they deliver.”

Issues:

- If Enhanced Service providers must pay for EST as a bottom-line expense there is a risk this will limit referrals to EST, impacting viability
- Providers will seek alternative options to building employability and skills training that can be funded via the Employment Fund
- EST will become a program purely for Digital Services as participation is funded
- If EST incurred as a bottom-line expense there can be no expectation or mandate that providers refer particular cohorts of job seekers to EST
- The rationale for not permitting providers be able to refer job seekers from their own caseload is not clear especially given the proposal that providers self-fund the course
- Delivering training to job seekers on your own caseload provides many benefits to the job seeker including an already established relationship and understanding, easy scheduling at the most appropriate time taking account of their goals and preferences, and convenience of location improving referral to commencement and completion rates.

Recommendation:

It is proposed that:

20. Participants in DES, TTW or Enhanced Services can be placed in EST and funded at a specified price through the Employment Fund or separated funding pool.
21. Providers of Enhanced Services, TTW and DES can deliver EST to job seekers from their own caseload, which will also assist in boosting referral to commencement rates.

Exposure Draft Appendix 2, 2.6 Requirements for Employability Skills Training

The Exposure Draft states

“It is the department’s intention that EST Providers do not need to be an RTO to deliver services. The department welcomes stakeholder feedback on this proposal”

Issues:

- Registered Training Organisations (RTOs) have quality standards to adhere to which are important in administering and delivering training course content to an acceptable standard.
- Changes to requirements could result in variable training and industry services to participants.
- RTO accreditations reduces the risk for government as RTOs need to meet minimum quality standards. Working with experienced RTOs, the Department can have confidence that the training provided will engage and retain participants of diverse ages and abilities, provide the required changes to behaviour and employability skills and have appropriate links to industry.

Recommendation:

It is proposed that:

22. EST providers continue to be registered RTOs or be required to partner with an RTO.

Licence Review timing

Exposure Draft Section 2.2.13 Licence Reviews

The Exposure Draft states:

“Licence Reviews will occur on an annual basis, for each licence that a provider holds.”

“The first Licence Review will be conducted based on performance data as at the end of September 2023, to allow enough time for sufficient performance data to be captured.”

“Any Provider granted a new licence will not be subject to a Licence Review before at least 12 months of operation.”

Issues:

- The first licence review using data as at end September 2023 is a mere 15 months into the new Licence period. This in effect only provides an approximate 6 month window of dedicated placement activity upon which provider performance would effectively be assessed. This is because:
 - Approximately the first three months of any Contract start up requires assessment of job seekers under the new arrangements, negotiation of new Job Plans and commencement of work to progress, prepare and place into work
 - Additionally, a six month minimum time frame (not including permissible breaks) is required to achieve a 26 week outcome.
 - The Departmental timeframe to undertake the Licence review process is not specified. Experience with previous business review and reallocation processes is that these often take a significant period of time to process. With an annual review cycle this can have implications including:
 - The next review period potentially commencing within a short timeframe of the one just concluded and certainly close to a period in which any adjustments have been fully implemented
 - A new Licence grantee being reviewed in a timeframe shortly after their 12 month moratorium period.

Recommendation:

It is proposed that:

23. The first Licence review process be undertaken at least 18 months and preferably 24 months into the new Licence period. This will enable the market to establish and permit considered and appropriate work to be undertaken with job seekers to achieve long term sustainable outcomes
24. The Department specify and commit to clear timeframes to commence, undertake, notify, conclude and implement each Licence review process.

Indexation timing

Draft New Employment Service Model Deed, Clause 158. Indexation

Clause 158.1 of the draft Deed states

“Subject to any Notice from the Department, the amounts of the following Fees will be increased by 6.8% at the end of each three year period following 1 July 2022.”

Issues:

- The continued indexation of the employment service fees is welcome
- Most industrial instruments including Modern Awards or enterprise agreements include annual pay review points for employees.

Recommendation:

It is proposed that:

25. indexation of fees occur annually to support provider and market viability and assist them to financially meet legal requirements to apply, as appropriate, pay rises and superannuation increases to employees per the requirements of the relevant industrial instrument.

KPMG also notes further *“adjustments could be required overtime depending on cost inflation changes.”*

The Standing Offer

Draft New Employment Service Model Deed, Section A2.2 Formation of Panel and Refresh

Clause 4.2 of the draft Deed states

“By entering into this Deed, the Panel Member makes an irrevocable standing offer to supply the Services to the Department in accordance with any Work Order issued by the Department.”

Issues:

- This is considered an unreasonable requirement especially for any Panel member not issued a Licence but also required to annually verify their upkeep of a range of quality and security accreditations.

Recommendation:

It is proposed that:

26. Panel members should be permitted, after providing appropriate forewarning, to exit the Panel. The Draft Deed currently commits organisations to make an irrevocable standing offer.

Payments to Host Organisations – Placement Management Services

Draft Employability Skills Training Deed, Chapter B3 Placement Management Services

Clause 98.4 of the draft Deed states

“The Provider must pay the relevant Host Organisation the PaTH Internship Host Payment or NWEP Host Payment (as applicable) from the Provider's own funds no later than five Business Days after the Eligible Placement Participant Commences in the Placement, unless otherwise agreed by the Host Organisation.”

Draft Career Transition Assistance Deed, Chapter B3 Placement Management Services

Clause 99.5 of the draft Deed states

“Once the Provider has properly paid an NWEP Host Payment in accordance with clause 99.2(a), the Provider may submit a claim for Reimbursement through the Department's IT Systems, but only in accordance with this clause 99 and any Guidelines.”

Issues:

- This is a pass-through cost for Providers and additional red tape that could be avoided. When the Host Agreement is being set up, the payment details for the Host could be recorded to allow automatic payment to Hosts.
- The payment to Hosts and then the subsequent reimbursement by the Department to Providers is administratively burdensome with no value or risk minimisation produced.

Recommendation:

It is proposed that:

27. Host Organisations should be paid the PaTH Internship Host Payment or the NWEP Host Payment directly by the Department. This would use the information recorded by the Provider, upon the Provider entering into the system that the Participant has commenced in the Placement.

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