

FTS Proposed Restructure Response Submission

INTRODUCTION	2
ACCOUNTS RECEIVABLE TEAM	2
ISSUES	5
Unclear Duties	5
Role Specific Requirements	7
Number of Positions.....	7
BILLING TEAM.....	8
ISSUES	10
Unclear Duties	10
AAO Role.....	11
Role Specific Requirements	11
Number of Positions.....	11
ACCOUNTS PAYABLE TEAM.....	11
ISSUES	13
Unclear Duties	13
Role Specific Requirements	13
Number of Positions.....	13
MERCER POINTS ALLOCATION	13
SUMMARY	13

INTRODUCTION

1. This submission is intended to raise the initial concerns that the Ambulance Employees Australia – Victoria (**AEAV**) has in respect of the proposed restructure of the FTS team. These submissions set out the AEAU's concerns in respect of the restructuring of the Accounts Receivable Team, the Billing Team and the Accounts Payable Team. The submissions also provides the AEAU's proposed solutions and recommendations to address these issues.

ACCOUNTS RECEIVABLE TEAM

2. The current team structure, has 18 persons engaged as Accounts Receivable Officers (**AROs**) including temps. The duties of an ARO are set out in the table below.¹

DUTIES CURRENTLY PERFORMED	
Customer Service	
1.	Accurately prepare, verify, process and distribute invoices in accordance with invoice cycles
2.	Respond efficiently and courteously by phone or in writing to queries from customers regarding their accounts.
3.	Respond to emails and phone calls from Debt Collection agencies where they are seeking approval to close accounts against non-billable classes, or where they require additional information in regard to their normal collection activities.
4.	Reassign invoices to the correct charge class, based on additional information received from customers or elsewhere
TAC Accounts: Process payments received from TAC. This includes	
5.	Preparing and submitting the TAC EDI file
6.	Applying payments received to the correct invoices
7.	Liaising with the TAC/patients/hospitals regarding missing/incomplete claims
Work Cover Accounts: Using the Billing Hierarchy, when Workcover has been identified as the responsible party for account:	
8.	Determine Workcover eligibility, status and responsible party
9.	Work with insurers to ensure accounts are paid in a timely manner
10.	Provide advice to patients to assist in resolution and payment of Workcover accounts
Hospital Accounts	
11.	Action queries and correspondence from hospitals in regard to their accounts
12.	Liaise with hospitals to ensure all accounts are paid in a timely manner

¹ This list has attempted to encompass all duties however it is possible that there are duties that the AEAU was not aware of at the time of drafting.

13.	Manage BOX and queries received
Mental Health Accounts	
14.	Using the Billing Hierarchy, identify the responsible party for mental health transports accounts and identify patient's legal status by applying the DH Guidelines.
15.	Analysing case sheets to determine category of mental health transports using the Mental Health Act & DHS Guidelines
DVA Accounts	
16.	Forward transaction file to DVA as and when required
17.	Process DVA rejections & receipts
18.	Liaise with hospitals/patients/DVA in order to secure payments
19.	Maintain all internal reports/spreadsheets in order to track and record all transactions
20.	Reassign DVA invoices as and when required
Interstate Accounts	
21.	Administer Interstate transports by assessing membership/pension and residency details creating invoices and receipting payments from interstate Ambulance services
22.	Maintain the internal spreadsheet for interstate accounts to record details of these transactions
23.	Manage interstate inbox
24.	Liaise with patients and interstate ambulance services
Receipt and Reconciliation of Payments	
25.	Process all payments made to AV, whether by EFT, cash or cheque in accordance with AV's policies and procedures...
26.	Ensure that any cheques received are applied to the correct transactions in Oracle and banked on the same day as receipt where possible
27.	Ensure that remittance advices are received and receipted accurately to maintain accurate receipt records
28.	Reconcile accounts and monies received within acceptable timeframes
29.	Accurately maintain and administer Monthly Credit Card payments and associated spreadsheets
30.	Maintain the use of, and be a contact point for, upgrades of EFTPOS facilities
Cash Management: Using the Oracle Cash Management Module, process the daily bank statement by:	
31.	Processing transactions into the Oracle system where required
32.	Ensuring all daily bank statement transactions are fully reconciled

Repaying Customers: Administer repayment programs for patients by:	
33.	Setting up and maintaining repayment plans/programs with patients
34.	Setting up direct debit payments via Corporate Online
35.	Manually upload payment file for weekly, fortnightly and monthly payments as required
36.	Issue demand letters for non-payments
37.	Refer accounts to debt and write-off as appropriate
38.	Update records based on payments taken via direct debit on a weekly basis
Records, Database & Testing: Maintain accurate patient records and database in accordance with AV's policies and procedures and Privacy Act by:	
39.	Reassigning invoices as required in a timely manner
40.	Generating, printing & posting monthly statements
41.	Completing Centrelink checks on Pensioner/HCC/DVA holders
42.	Maintain and update commentary in BI reporting tool
43.	Input data into FTS spread sheet to enable accurate reporting
44.	Prepare fortnightly report for management detailing the status of outstanding commercial debt
45.	Participating in Oracle User Acceptance System Testing for the AR/PCR module in conjunction with the Accounting and IT teams
Debt Collection and Recovery	
46.	Send accounts to Debt Collection Agencies as required including daily file of accounts that have reached the aging criteria as well as accounts that have not responded to any internal collection activity
47.	Liaise and maintain contact with patients, hospitals and mental health teams to ensure correct billing and patient information
48.	Monitor customer account details for non-payments, delayed payments and other irregularities
49.	Perform regular collection activity on accounts designated for "internal" collection. Includes consultation with management to determine the appropriate course of action where applicable
50.	Debt receipting
Enter and balancing write-off adjustments into the Oracle System	
51.	Format spreadsheet and submit with monthly write-offs for approval by General Manager and Board

52.	Check invoices received from various Collection Agencies for commission claims. Ensure they are accurate and verify payments have been made to AV as claimed. Allocate and endorse the invoices for approval by management
Complaints Handling	
53.	Investigate and resolve complaints regarding invoices in a timely and professional manner. Includes liaison with Professional Standards and managing complaints using Riskman where applicable
General Administration/Miscellaneous Invoicing	
54.	Order and monitor stationery balances, including Tax Invoice and Final Notice Stationery and envelopes for the folding machine
55.	Process and follow up non transport (miscellaneous) invoices
56.	Prepare monthly statements and reports for commercial customers
57.	Setup new commercial customers as required
58.	Assist with training of new Accounts Receivable staff members as appropriate
59.	Auditing of accounts to determine correct billing when contacted by external parties

3. Despite the generalised title and list of duties, employees do have separate and distinct responsibilities.
4. The restructure proposes to split the Accounts Receivable role into three separate roles:
 - a. Accounts Receivable Customer Service Officer (Consumer Debtors) (**CSO**);
 - b. Accounts Receivable Account Management Officer (Commercial and Consumer Debtor) (**AMO**);
 - c. Bank and Administration Officer (**BAO**).

(together, the **New AR Positions**).
5. The effect of the proposed restructure appears to formalise the distinctions of duties that currently exists within the Accounts Receivable Team.

ISSUES

Unclear Duties

6. A concern, as a result of the restructure, is the content of the New AR Position descriptions.
7. Prior to the proposed restructure, the positions description of the ARO role contained significantly more information about the duties that the ARO would be expected to perform.
8. Due to the broad and vague nature of the statements contained it is not clear what duties will actually be required to be performed by each of the roles. This has resulted in the AEA having the following concerns:
 - a. The possibility of job creep;
 - b. Concern that the duties currently performed in the team are not covered by the New AR Position descriptions; and

- c. Employee uncertainty over which position to apply for as a result of the lack of clarity.
9. The concern in relation to job creep, is that due to the broad nature of the accountabilities contained in the position descriptions, additional responsibilities can be added to the roles over time.
10. This concern is not unjustified. Since 2014, the AEAV has become aware of numerous additional responsibilities being allocated to the ARO's. These duties include but are not limited to:

SUBJECT MATTER	NEW DUTY
Hospital Accounts	Manage BOX and queries received
Interstate Accounts	Manage interstate inbox
	Liaise with patients and interstate ambulance services
Repaying Customers	Manually upload payment file for weekly, fortnightly and monthly payments as required
	Issue demand letters for non-payments
	Refer accounts to debt and write-off as appropriate
Records, Database and Testing	Maintain and update commentary in BI reporting tool
	Input data into FTS spread sheet to enable accurate reporting
	Prepare fortnightly report for management detailing the status of outstanding commercial debt
Debt Collection & Recovery	Debt receipting
General Administration/Miscellaneous Invoicing	Prepare monthly statements and reports for commercial customers
	Setup new commercial customers as required
	Auditing of accounts to determine correct billing when contacted by external parties

11. In respect of uncertainty over which role to apply for, the lack of specificity in the position does not allow employees to accurately assess which duties are to be assigned to which position. Employees cannot make an informed decision on which role to apply for.
12. The AEAV is also concerned that without proper delineation of duties, each person in the Accounts Receivable team will be expected to perform duties in any other area. For example:
- Both the AMO and the BAO are required to provide support to the wider Accounts Receivable Collection Team:** No information has been provided on what "support" the roles are going to be required to provide; and
 - All New AR Positions states that they are required to "undertake general administrative duties":** No information is provided on what administrative duties the employees will be required to perform and whether the administrative duties will be limited to the Accounts Receivable team.

Proposed Solution

13. We recommend Ambulance Victoria redraft the position descriptions to contain more detailed descriptions of the duties each role will be required to perform.
14. Once position descriptions have been redrafted to include sufficient details of duties further consultation will be required including in respect of Mercer points allocation.

Role Specific Requirements

15. The role specific requirements for all three of the New AR Positions include the following two requirements:
 - a. Required to possess a current Victorian Driver License; and
 - b. Willingness to travel throughout Metropolitan Melbourne and Regional Victoria as required.
16. Consultation with the Accounts Receivable Team has established that there is no current requirement to hold a Victorian Drivers License for persons employed in the team. Further when reviewing the Key Accountability section, none of the accountabilities require the driving of a car.
17. Consultation with the Accounts Receivable Team also established that it is not a current requirement for team members to travel, whether through Melbourne Metropolitan or Regional Victoria. Further when reviewing the Key Accountability section, none of the accountabilities appear to require travel for their performance. The inclusion of these key requirements without basis is a key concern of the AEA.

Proposed Solution

18. As these abovementioned requirements appear to be superfluous to the requirements of the New AR positions, the AEA recommends the requirements to have a Victorian Drivers License and to travel within Metropolitan Melbourne and Regional Victoria be removed as a key requirement from the Position Descriptions.

Number of Positions

19. A separate issue is the number of people allocated to each of the New AR positions. The Restructure proposes the following:
 - a. Seven CSOs;
 - b. Five AMOs; and
 - c. Three BAOs.
20. Consultation with employees has raised several issues for the AEA. These issues include concerns regarding:
 - a. Increased workload;
 - b. Increased complexity of the roles; and
 - c. Non-replacement of previous team members.
21. In relation to the CSO role, the number of calls and the complexity of calls has continued to increase. Further there are additional tasks that are failing to be addressed as employees have constant pressure to answer the phones. Consequently, in the view of the AEA seven CSOs is not sufficient are to meet workload demands of the team.
22. In relation to the AMOs, the AEA is of the view that five roles will possibly be sufficient but only subject to Ambulance Victoria removing requirements for the ARO's to be on the phones.

Phone duties prevent the officers from being able to perform their role efficiently and effectively.

23. In relation to the BAOs, the current proposal is for three roles. Based on current workloads in the view of the AEA it is thought that this number is sufficient. However, the restructure proposes that additional duties will be allocated to the BAO roles. Further information needs to be provided with respect of these additional duties to confirm whether the AEA's position on the appropriate number of BAOs will change.

Proposed Solution

24. The AEA is concerned that if the workload pressure is not addressed in the restructure employees will continue to be overworked and struggle to meet workload demands.
25. In order to prevent these issues, we recommend:
- a. Nine - 10 CSOs
 - b. Five - Six AMOs with no telephone responsibilities
 - c. Three - Four BAOs (to be reassessed based on the additional duties to be allocated)
26. These recommendations may change depending upon any redrafting of the New AR position description.

BILLING TEAM

27. The current team structure has 40 people employed in the Billing PCR Officer roles (**PCR**). The duties currently performed by the PCRs are set out in the table below.²

DUTIES PERFORMED	
1.	Analyse and interpret all emergency and non-emergency PCRs including manual and air related PCRS to determine billing responsibility in accordance with the DH Patient Transport Charging Guidelines.
2.	Interpret patient pre-existing illnesses and related injuries as defined by AV billing guidelines and check previous transports to ascertain status i.e. private health, pensioner, subscriber etc.
3.	Validate patient entitlements by reference to both the Centrelink and AV membership databases
4.	Liaise with internal and external providers to obtain patient information on transports.
5.	Identify the relevant charge class from the AV Billing hierarchy and by reference to the DH guidelines
6.	Interpret the billing arrangements for Interstate, Overseas and visitor class patients from reciprocal agreements to generate an appropriate invoice
7.	Refer to the Event Register to confirm patient transport information including pick up destination, rendezvous with other ambulance providers
8.	Check PCRs where names/addresses are incomplete. Where appropriate, forward these to hospitals and follow up as and when required. Maintain a spread sheet of these "Unknown" PCRs
9.	Review all PCRs processed under the "PSY" category to determine the responsible billable party, in accordance with Billing Guidelines.

² This list has attempted to encompass all duties however it is possible that there are duties that the AEA was not aware of at the time of drafting.

10.	Correct and edit Patient Care Record information from various daily reports and transfer/reverse invoice discrepancies where necessary in accordance with AV procedures
11.	Create control cards that are not captured by ESTA during power outages, taxi company and other private providers and Air Ambulance.
12.	Investigate patient transport as per policy and procedure and refer anomalies to the Billing- PCR Team Leader.
13.	Aim to meet the PCR monthly target for billable and non-billable invoices
14.	Provide high level of customer service by responding and resolving customer queries
15.	Process all Air road legs to the appropriate customer numbers for review and synchronised billing
16.	Confirm air transports against appropriate lists.
17.	Run regular "PCR not entered" reports and investigate each control card where a patient was transported and a PCR has not been received. Follow up to ensure all transports are billed.
18.	Cross match PCR billing to the air ambulance spreadsheets to ensure that all air ambulance journeys have been correctly billed in the PCR billing system
19.	Maintain the Oracle database for patient details, i.e. name, address, date of birth, pension/DVA number and any relevant information in relation to class type.
20.	Maintain and update spread sheets relating to Air Ambulance, taxis, hospital, medical centres and nursing homes
21.	Participate in Oracle User Acceptance System Testing for the PCR module in conjunction with the Accounting and IT teams.
22.	Review daily CAD Validation Reports and action any items in error when required.
23.	Undertake general administrative duties including mail collection and distribution, general filing and word processing activities.
24.	Provide support at meetings including note taking, recording, preparing and distributing minutes where required
25.	Assist in training and provide support to colleagues when required in the use of Oracle, Onyx, Centrelink and AV processes and procedures
26.	Maintain filing system in accordance with Records Management and Privacy Act.
27.	Provide feedback and recommendations on enhancing PCR systems and processes
28.	Processing TLC for kids Transports
29.	VACIS Error processing from VACIS Validation Report - cross referencing all relevant data via RTF File/Control Cards/Ambflight/ERA to locate either the Correct Date/Case Number/Team/Fleet/Officer Number ETC – Refer to MAN FTS 84 - VACIS and CAD Errors Processing Manual
30.	Manual Ops - This is when ESTA upgrade or carry maintenance on their system and each 000 call is written on cards by hand. The upgrade or maintenance is usually carried out from Midnight to 6am, typically 4 times (more or less) annually and usually takes 3 plus weeks to enter manually into the system on each occurrence – Refer to MAN FTS 84 - VACIS and CAD Errors Processing Manual
31.	Processing of ON HOLD PCRS – refer to DRAFT MAN FTS 12 - On Hold Processing Manual
32.	Processing of Return Mail – refer to DRAFT MAN FTS 13 - Returned Mail Processing Manual
33.	Processing of ARV PCRs – refer to DRAFT MAN FTS 14 - AV ARV Processing Manual

34.	Processing of DCA spreadsheet – refer to MAN FTS 05 - AV Automation of Debt Collection Claim and Contact Information Manual
35.	Processing of OOM requests – refer to MAN FTS 06 - Centrelink Organisational Online Mail OOM Manual
36.	AP supplier creation
37.	Prioritise employee reimbursements, urgent requests and then all other requests – refer to MAN FTS 08 - Manual Supplier and Employee Creation/Validation Process for Payment Requests
38.	Processing of PCRs from private providers – refer to MAN FTS 081 AV PCR User Guide Box.com Manual and MAN FTS 49 AV Box.com Manual
39.	Processing of OSR PCRs – refer to MAN FTS 18 OSR Audit and Reporting Manual
40.	Daily hospital invoices and the associated monthly statement
41.	Reception duties/ answering phone calls/reception of deliveries (formally processed by Accounts Payable Department)
42.	Perform the actual training of new PCR officers in the full range of duties

28. The proposed restructure would see only 35 people in the role of Billing Customer Service Officer (**BCSO**) with up to nine of those people at any one time rotating through the role of Billing Assessment Audit Officer (**AAO**).

ISSUES

Unclear Duties

29. A concern of the AEA is that the proposed BCSO position description is too broad, lacks clarity and simultaneously fails to sufficiently describe the duties that the PCRs currently perform. There is a particular concern that the lack of detail and broad statement will result in job creep, whereby additional responsibilities are allocated to the team without any acknowledgment of the increase workload or the new duties.
30. A particular concern is the inclusion of the accountability to, “[u]ndertake general administrative duties and other tasks as required” and whether this will result in requirements to perform audit functions when not rotating through the AAO role, for example.
31. Job creep is significant concern as it is an issue that is already prevalent within the role. Duties 28 to 42 as set out in the table at paragraph 27 are additional duties that have been added to the PCR role since 2014.
32. An additional issue that the AEA has is despite the broad statements included in the BCSO position description, there are still a number of duties that have not been factored into the BCSO position description including duties at numbers 11, 15-18, 20, 22-24, 26 and 28-41 in the table at paragraph 27 above.

Proposed Solution

33. The AEA recommends Ambulance Victoria redraft the position descriptions to contain a more detailed description of the duties each role will be required to perform.
34. Once positions descriptions have been redrafted to include sufficient details of duties further consultation will be required including in respect of Mercer points allocation.

AAO Role

35. The AEAV has concerns regarding the operation of the AAO role. In respect of the AAO role there is concern that:
- despite having audit responsibilities, the role is intended to be classified at the same level as the BCSO role;
 - Employees will not be willing to apply for the role without an increase in Mercer points recognition;
 - whether a rotation system is practical for the role; and
 - whether BCSOs will still be required to perform the audit function.

Proposed Solution

36. In the view of the AEAV, the willingness of employees to express interest in the role is likely to be subject to whether there is an increased wage offered.
37. We recommend that the position description be redrafted to include more a detailed job description. Should an updated draft be provided further consultation will be required, in particular regarding Mercer point allocation.
38. As stated above it is expected that the Mercer point allocation will significantly impact employees' willingness to apply for the role and whether the AEAV will support the rotation of the AAO role.

Role Specific Requirements

39. The AEAV refers to and repeat paragraphs 15 to 18 above, the points raised in respect of the New AR Positions are applicable to the BCSO and AAO roles.

Number of Positions

40. The proposed restructure includes the following number of roles:
- Two teams of BCSOs with 12-13 people;
 - Up to nine AAOs.
41. The concern with this is that it reduces the number of persons performing the work from 40 to between 33 and 35.

Proposed Solution

42. Until the duties of the roles are finalised it is difficult to make a recommendation as to the number of BCSOs and AAOs required. However, in the meantime the AEAV's position is that the overall number of persons performing these roles should not be reduced from 40.

ACCOUNTS PAYABLE TEAM

43. The Accounts Payable team currently consists of four Accounts Payable Officers (**APO**). The duties of the APOs are set out in the table below.³

DUTIES	
Processing of Accounts/Invoices	
1.	Ensure tax invoices/credit notes are correct and complete before being submitted for payment
2.	Review invoices and match to purchase order where applicable

³ This list has attempted to encompass all duties however it is possible that there are duties that the AEAV was not aware of at the time of drafting.

3.	Ensure general ledger coding and other data for all invoices to be entered into Oracle Financials is accurate and if there are any discrepancies, resolve and amend where applicable
4.	Ensure invoices are approved within specified delegations
5.	Generate regular and ad hoc payments via cheque, EFT or wire funds transfer for approved invoices within specified timeframes
6.	Identify and investigate instances of unprecedented cheques and liaise with banking institutions to recommend appropriate action
7.	Review and reconcile creditor statements and resolve discrepancies, verbally or written, where necessary
8.	Monitor and initiate approval process for new vendors
9.	Provide information to managers and support staff to improve the understanding of Accounts processing and minimise errors and delays
10.	Assist with training of new Accounts Payable Officers as/when required
11.	Generate and provide ad-hoc reports from Oracle as required (i.e. Amounts spent with suppliers for specific periods etc)
12.	Receive and distribute incoming/outgoing and DX mail for the relevant offices as required
13.	Provide all cheque/EFT payment registers for authorisation by the relevant manager and file when returned
14.	Other duties as required
Petty Cash	
15.	Reconcile petty cash claims from petty cash holders
16.	Support petty cash holders in the management of their petty cash flow and resolving discrepancies
17.	Train petty cash holders on the Excel based petty cash system
18.	Assist with the annual audit of petty cash floats in conjunction with the Accounting team
19.	Liaise with banking institutions in relation to cheque cashing authorities
Records, Database & Testing	
20.	Ensure all records are filed and archived promptly to enable quick and accurate record retrieval
21.	Maintain and update the vendor file with changes to address, bank details, phone numbers, business and GST identification
22.	Participate in Oracle User Acceptance System Testing for Accounts Payable module in conjunction with the Accounting and IT team
GST	
23.	Verify creditor details i.e. ABN and GST status
24.	Verify GST is charges in accordance with Vendor GST status and current GST legislation
25.	Identify GST free, input tax, outside GST and capital expenditure items
26.	Issue relevant forms for completion to non-registered GST suppliers
Customer Service	
27.	As a first point of contact for creditor queries, maintaining a high standard of customer service to enhance AV's reputation
28.	Provide considered and appropriate responses to creditor account enquires, payments and complaints
Mail Room and Front Desk	
29.	Answer incoming calls on the Reception mobile handset
30.	Greet and direct visitors as required

31.	Receive and distribute incoming/outgoing mail, DX and deliveries
-----	--

44. The proposed restructure would see four people remain in the APO roles.

ISSUES

Unclear Duties

45. The information provided in relation to the proposed restructure states that there will be minimal changes to the APO role. However, the proposed position description is vague and broad. The AEA V also has concerns that all duties that the APOs currently perform are not covered by the new APO position description. For example, APOs are currently responsible for confirming that pays for Ambulance Victoria are released. In our view, this is not a duty reflected in the position description.

Proposed Solution

46. The AEA V recommends Ambulance Victoria redraft the position description to contain a more detailed description of the duties.
47. Once the position description has been redrafted to include sufficient details of duties, further consultation will be required including in respect of Mercer points allocation.

Role Specific Requirements

48. We refer to and repeat paragraphs 15 to 18 above, the points raised in respect of the New AR Positions are applicable to the APO role.

Number of Positions

49. The number of positions allocated to the APO role has not been increased in the restructure.
50. The AEA V has been informed that previously there were six persons doing the APO role which was reduced to four. This is despite a significant increase in workload.

Proposed Solution

51. The AEA V recommends the number of APO's be increased to six in line with previous staffing numbers in the team.

MERCER POINTS ALLOCATION

52. Once position descriptions have been finalised, the AEA V requests it be provided with the updated Mercer analysis to be conducted by Ambulance Victoria.

SUMMARY

53. The primary concern of the AEA V in relation to the proposed restructure relate to:
- The lack of detail in the position descriptions;
 - The addition of key requirements that appear unrelated to the performance of the roles; and
 - The numbers of roles.
54. In relation to the position descriptions the AEA V has a general concern that the position descriptions do not provide clarity over the specific duties employees will be required to perform and whether Ambulance Victoria has appreciated the entirety of the duties that the employees in each role in the FTS Team currently perform.

55. Resultantly, as set out in the body of the submission we request that the position descriptions are redrafted to provide more information in respect of duties. Once we are satisfied that the expected duties are clear as set out at paragraph 52 above, we will be requesting to be provided with the Mercer points analysis of each position.