# NDIS Success webinar 4 script

### Slide 1

Welcome to the forth webinar as part of the NDIS Success Roadmap.

### Slide 2

Community Business Bureau acknowledges the traditional owners of country throughout Australia. We recognise their continuing connection to land, waters and community. We pay our respects to them and their cultures, and to elders past, present and emerging.

### Slide 3

Thank you for joining us for the fourth webinar in our NDIS Success series.

My name is Jane Arnott and on behalf of the business consulting team I would like to welcome you to this webinar on quality, risk and compliance.

# Slide 4

The NDIS is highly regulated so you need to understand the NDIS Code of Practice and the Quality and Safeguarding rules and regulations. In today's webinar

We will give you an insight into the compliance requirements for NDIS providers.

If you have not watched the previous webinars we strongly encourage you to ....

In the \*first webinar we gave an insight into the fundamentals of the NDIS to help you understand what it means to provide services under the NDIS.

In our \*second webinar we discussed the importance of understanding the market you want to operate in. Who are your potential customers? What do they need and want from their NDIS provider and who else is already providing NDIS services in your area?

In webinar \*three we looked at how you can develop your NDIS service model.

In the next webinar we will give you tips on developing your marketing strategy to achieve your goals.

In the \*last webinar of our series we will explain the importance of understanding and analysing your potential revenue and associated costs. Financial viability is critical for long term sustainability in the NDIS.

These three factors are covered in today's session because they are interlinked.

Compliance is your licence to operate – you need to be compliant to be able to offer, and charge for services in the market.

Compliance sets a benchmark for the quality of service you need to deliver – including who delivers it and how you engage with participants.

Quality of service is about the human rights of your participants – the evidence to the aged care and disability Royal Commissions demonstrate how important it is to provide quality services that respect the rights of your participants.

Also one means of managing risk – to your participants – which in turn manages risk to your employees and business.

Linking back on our previous webinars: Quality also informs your service design – or how you offer service – could be a point of difference in your market.

Looking forward: Quality doesn't come free – costs need to be integrated into your financial model

### Slide 6

- 1. Why register?
- 2. The NDIS Commission, and the Rules
- 3.NDIS Code of Conduct
- 4. Worker screening
- 5. The registration process
- 6.NDIS Practice Standards
- 7. Audits and recertification
- 8. Your service agreement
- 9. Support planning
- 10. Managing risk in the NDIS
- 11.Implications for your business

### Slide 7

Why register?

### Slide 8

As mentioned in webinar 1 you don't have to be registered to provide services.

This table compares the requirements of registered and unregistered providers.

Both registered and unregistered providers are obliged to provide services that are safe and protect people from harm.

All providers need to comply with the NDIS Code of Conduct (and help workers to understand and follow the code), conduct Worker Screening and have complaints management systems in place.

A registered provider can provide services to all people with an NDIS plan, if registered for that service. Unregistered providers can only provide services to plan and self managed participants.

To register, a provider needs to undergo a registration process and regular audits.

This requires the provider to establish quality systems and procedures and to implement these throughout the organisation. Undergoing registration communicates to your customers that you are putting the effort in to keep them safe.

### Slide 9

For some services the provider must be registered.

This includes Plan Management, Specialist Disability Accommodation, Behaviour Support and if implementing Behaviour Support Plans and using restrictive practices.

### Slide 10

As discussed in webinar 1.

People should be asked at their planning meeting how they want their money managed and they are free to choose.

If the money is NDIA managed the person can only use registered providers.

Anyone can request plan management and with some exceptions this will be approved. The advantage of plan management is that the person can spend the funds with registered and unregistered providers.

Self management is only approved for people who can confidently navigate the system and are not at personal and financial risk. If a person with an NDIS plan chooses to self manage their NDIS funds, they are free to engage any provider – registered or not and they can negotiate their own prices.

Many people chose a combination of how the money is managed in their plan.

#### Slide 11

Access to full NDIS market – regardless of how plans are managed.

Required for certain services.

Registration – statement about preparedness to commit to compliance regime.

Participants with most complex needs — or most vulnerable — more likely to be agency managed. If you decide not to register — making a decision not to make services available to them. For not for profits in particular, may not sit well with your values.

Reasons not to: costs (financial and other), can still access part of the market, which may be enough for you.

Many providers who have undergone the registration and audit process have fed back to us that the registration requires commitment and hard work, however most acknowledged that it has improved many aspects within their operations and improved outcomes for their customers.

### Slide 12

Costs involved – in terms of both time and cash – in being registered provider. Work involved in getting to registration standard and staying there re audits, operational practices, documentation etc.

Can't give you a general figure for this. Depends on your starting point, e.g. in terms of the quality measures and other processes you already have in place; nature of your service, the supports you offer, and the size of your business.

Need to factor these into your budget in terms of both start up costs, and ongoing cost of doing business.

### Slide 13

The Commission, and the Rules

### Slide 14

First webinar we talked about the agencies involved in the NDIS – NDIS Quality and Safeguards Commission responsible for registration

Rolled out across Australia since July 2018. Last stage July 2020 – when will have responsibility for registration and regulation of providers in WA – then national body covering every state and territory

**Functions** 

Registration and regulation of providers

Compliance with the NDIS Practice Standards and NDIS Code of Conduct

Complaints about NDIS services and supports

Reportable incidents, including abuse and neglect of a participant

Use of restrictive practices

Nationally consistent NDIS worker screening

# Slide 15

NDIS Quality and Safeguard Rules – determined by legislation

Rules cover:

NDIS Code of Conduct

Provider Registration

NDIS Practice Standards and Quality Indicators

Incident Management and Reportable Incidents

Complaints Management and Resolution

Worker Screening

# Slide 16

And there is more.

Seems like a lot – and it is a lot – but the rules that apply to you as a provider will depend on your scope of service.

# Slide 17

NDIS Code of Conduct

### Slide 18

Whether registered or not – your org and your employees need to understand and apply code of conduct.

### Slide 19

The NDIS Code of Conduct sets the expectations for appropriate and ethical conduct in delivery of supports and services.

- Human rights based approach.
- In providing supports or services to people with disability, a person covered by the code must:
- Act with respect for individual rights to freedom of expression, self-determination and decision-making in accordance with applicable laws and conventions,
- Respect the privacy of people with disability
- Provide supports and services in a safe an competent manner with care and skill
- Act with integrity, honesty and transparency
- Ensure quality and safety
- Take all reasonable steps to prevent and respond to all forms of violence against, and exploitation, neglect and abuse of, people with disability
- Take all reasonable steps to prevent and respond to sexual misconduct.

The Commission has developed individual guidelines for workers and for providers to understand their obligations. We have provided a link in the Activity workbook.

### Slide 20

Example:

Guidance for providers and workers includes subheadings and more detail under each aspect of the code.

Plus scenarios/examples

### Slide 21

Online module for workers to understand obligations under Code of Conduct

Mandatory to put workers through program

Keep record of who has completed – auditors will be looking for copies of the certificates that are produced upon completion of training

# Slide 22

Worker screening

### Slide 23

Link to list of specified supports and services in worksheet

Contact includes physical contact, face-to-face contact, oral communication, written communication and electronic communication.

### Slide 24

The registration process

#### Slide 25

Total process can take several months – do not expect quick turnaround – expect over six months

#### Slide 26

When you complete the **online application form** to become a registered NDIS provider, you need to provide information, including:

- your organisation's contact details
- your corporate structure
- coverage areas your outlets/places of operation, and
- your key personnel
- service profile supports and services your organisation delivers.

Select the registration groups your organisation provides: This determines which NDIS Practice Standards apply to your organisation. Based on your responses, the form will filter to show you relevant information.

Complete a self-assessment against the NDIS Practice Standards relevant to the supports and services your organisation delivers to participants and upload any documents required as evidence.

You can save the form and return to complete it at any time within 60 days.

Gather as much info as can in advance.

Be realistic about numbers of participants being supported or expected to be supported, as this has an impact on audit.

No participants at commencement is fine, and will result in 'provisional' audit. Witnessing of service delivery will take place later (probably within 12 months after registration).

# Slide 27

After you submit your online application, you will receive an 'initial scope of audit' document by email from the NDIS Commission, summarising the registration requirements that apply to your organisation. This outlines whether you require a 'verification' or 'certification'

**audit** and what your organisation needs to demonstrate to comply with the relevant NDIS Practice Standards.

It is your responsibility as the applicant to engage an approved quality auditor to undertake the audit. They will use the 'initial scope of audit' document to quote for their services. You can also discuss your specific needs and circumstances with auditors to negotiate the best value.

If registering as a Support Coordinator, you can provide service under Assistance with Daily life, Support coordination, Improved Living arrangements, Increased Social and Community Participant and Improved Daily Living Skills.

#### Slide 28

Supports and registration group provide determines NDIS standards that apply and registration via verification and certification.

Scope of audit doc from Commission determines if you need to go the verification or certification route.

Verification audits are a lighter touch desktop audit, while certification audits are a more detailed process – and requires interim audits once you are registered.

Both types of audit will be proportionate to the size and scale of your organisation and the supports you are seeking to be registered to deliver.

Table available from NDIS Q&S Commission: link in the activity worksheet.

### Slide 29

Examples demonstrate that the more intensive supports require more detailed certification route to registration

Example of reg groups and modules available from NDIS Commission website – link in activity sheet

# Slide 30

### STEP 3. Undergo an audit

After you have selected an approved quality auditor, they will check that the scope of audit is accurate and begin the audit process.

Auditors will also complete their assessment in a way that takes your organisation's size and scale, and the scope and complexity of the services being delivered, into consideration.

The auditor will work with you to help you understand the findings and give you the opportunity to ask and answer any questions. The auditor will submit the outcome of their audit to the NDIS Commission through an online portal.

# Slide 31

### Verification audits

Usually, providers requiring a verification quality audit deliver lower risk/lower complexity supports and services.

Many providers requiring a verification audit are already subject to professional regulation as a requirement of doing business, e.g. through the Australian Health Practitioner Regulation Agency (AHPRA) and other professional bodies.

Professional regulation means a practitioner must already meet set standards and is subject to ongoing monitoring of their competency to practice, including through continuing professional development.

### Slide 32

Relevant qualifications

Expertise and experience

Incident management processes/policies

Complaints management processes/policies

Risk management processes/policies

Document on NDIS Commission website that lists required documentation for verification – link in activity sheet

### Slide 33

Pre-employment checks – in line with worker screening requirements

- Anyone who has more than incidental contact with person with disability
- In a role for which the normal duties include the direct delivery of specified supports or services
- Key personnel: key executive, management or operational positions incl. board members

# Slide 34

For body corporates:

- -One staff member who will deliver the support has met the requirements for each profession(s) the provider intends to deliver under registration group
- -Where provider has multiple staff working with the same profession it is the responsibility of the provider to ensure staff achieve the same standard

For individuals/partners qualifications and HR related checks conducted on all individuals

#### Slide 35

# 127 Plan management

-Required qualification/experience: accountant/bookkeeper

### Slide 36

- Certificate of completion of mandatory NDIS worker orientation program for each staff member
- Personal accident insurance or worker's compensation insurance. Certification of currency meeting at least minimum level of cover

# Slide 37

- Incident management process relevant to supports delivered in your registration group
- Provide material provided to participants
- Compliant with NDIS (Incident Management and Reportable Incidents) Rules 2018
- Process should be relevant to the size and scale of the provider and scope and complexity of supports

### Slide 38

Obligation to notify the NDIS Commission of reportable incidents which include:

- death, serious injury, abuse or neglect
- unlawful sexual or physical contact
- sexual misconduct, including grooming
- unauthorised use of restrictive practices

- Complaints management process relevant to supports delivered in your registration group
- Compliant with NDIS (Complaint) Rules 2018 and follow principles of fairness and natural justice.
- Process should be relevant to the size and scale of the provider and scope and complexity of supports

 Accessible, advice on access to advocates, and how to complain to the NDIS Commission

Important that complaints process made available to participants in accessible format, and advises about access to advocates, and how to complain to the NDIS Commission.

#### Slide 40

- Work health and safety policies and procedure relevant to supports delivered in your registration group
- Public liability insurance
- Professional indemnity insurance
- Policies and procedures should be relevant to the size and scale of the provider and scope and complexity of supports

# Slide 41

Providers requiring a certification audit provide more complex or higher risk supports and services. In a certification audit, providers are assessed against the NDIS Practice Standards which may include assessment against the core module and any supplementary module relevant to the type of support they deliver.

The registration requirements outline the compliance requirements for the core and supplementary modules by registration group.

Assessment includes core capabilities, such as:

- risk management;
- delivery of supports;
- the delivery environment; and
- governance and operational management

# Slide 42

- Document reviews
- Site visits
- Interviews with workers
- Interviews with participants

The provider will engage an approved quality auditor to complete the certification audit. This will include document reviews, site visits and interviews with NDIS workers and participants.

### Slide 43

STEP 4. The NDIS Commission assesses your application and makes a decision

Commission will consider audit report and undertake a suitability assessment of your key personnel. This is undertaken by the Commission, not the auditor, and they take it very seriously.

Some applications take longer to process than others. The timeframe depends on various factors, including the size and scale of your organisation, as well as the complexity and range of the supports and services you deliver. Commission advises that they are giving priority to new providers (rather than existing going through rego renewal). Feedback from clients that takes registration process takes 6-9 months

Commission contact you to let you know if your application has been successful and the reasons why or why not.

Registered for your selected reg groups, and for a specific timeframe – normally three years.

## Slide 44

In assessing your registration application, the NDIS Commission will consider the outcomes of the audit and conduct a suitability assessment of your organisation and key personnel.

The NDIS Commission will assess your application with respect to the suitability of your organisation and the suitability of your organisation's 'Key Personnel'.

Key personnel are the individuals who hold key executive, management or operational positions in your organisation, such as Directors, Managers, Board Members, Chief Executive Officer or Chairperson. You must include all key personnel on your application.

### What is a suitability assessment?

Considers whether the NDIS provider or their key personnel have previously been a registered NDIS provider:

- had a banning order in place
- any past convictions
- been insolvent under administration
- had adverse findings or enforcement action taken by any relevant authorities
- been the subject of findings or judgement in relation to fraud, misrepresentation, or dishonesty
- been disqualified from managing corporation

# Slide 45

Once registered – comply with the conditions.

Until national worker screening process is in place, relevant jurisdictional requirements remain.

### Slide 47

- Registration is for a set period
- Recertification process operates on similar model to registration
- Includes audit
- Can start recertification process six months before end of current registration period

### Slide 48

NDIS Practice Standards – Critical part of registration process and maintaining registration

### Slide 49

Two part model

**Core module** – applies broadly, but with some exceptions

Exception: Early Childhood Supports, which requires:

Practice Standard: 'Freedom from violence, abuse, neglect, exploitation or discrimination'

# Module 3: Early Childhood support

Exception: Where a sole trader/partnership is delivering Early Childhood Supports and Therapeutic Supports only, this requires:

Practice Standard: 'Freedom from violence, abuse, neglect, exploitation or discrimination'

### Module 3: Early Childhood support, plus

Verification Standards

Specialised Disability Accommodation (SDA)

**Module 5** by certification as a stand alone module where the NDIS provider is registering only for SDA Registration Group

# Slide 50

Each component of the NDIS Practice Standards consists of a series of high level, participant-focused outcomes. Under each outcome are a number of quality indicators that auditors will use to assess your compliance with the NDIS Practice Standards.

# Core module of quality standards covers four key areas

- 1. Rights participants and responsibility of providers
- 2. Governance and operational management
- 3. The delivery of supports
- 4. The environment in which supports are delivered.

# 22 outcomes and 87 Quality Indicators

# Slide 52

Rights and responsibilities standard has these five outcomes

- Person-centred supports
- Individual values and beliefs
- Privacy and dignity
- Independence and informed choice
- Violence, abuse, neglect, exploitation, discrimination

### Slide 53

- Governance and operational management
- Risk management
- Quality management
- Information management
- Feedback and complaints management
- Incident management
- HR management
- Continuity of support

Important for our board to be across these and will discuss in governance webinars

# Slide 54

- Access to supports
- Support planning
- Service agreements
- Responsive support provision
- Transition to and from provider

- Safe environment
- Participant money and property
- Management of medication
- Management of waste

• Not all of these are mandatory – dependent upon type of supports provided, e.g. whether provide medication management.

### Slide 56

Core: Rights and responsibilities – Individual values and beliefs

**Outcome:** Each participant accesses supports that respect their culture, diversity, values and beliefs

### Indicators:

- At the direction of the participant, the culture, diversity, values and beliefs of that participant are identified and sensitively responded to
- Each participant's right to practice their culture, values and beliefs while accessing supports is supported

# Slide 57

Additional standards may apply depending on registration group and supports provided.

### Slide 58

How do you support staff in understanding and applying the standards?

- Induction program and records
  - o NDIS mandatory worker orientation completed and recorded
- Staff, volunteers, contractors are trained in this standard and training records kept
- Employees understand the significance of the standards and the relevance to their own role
- Policies addressing all personnel

### Slide 59

- Senior staff understand the significance the standards and role model behaviours that support the standards
- How are reports of actual or suspected violence, abuse neglect, exploitation or discrimination managed, including reports to the board?
- How does the culture of your governing body underpin the standards?

# Slide 60

Audits and renewals

Registration

• Renewal/recertification – six months before expiry of registration

For providers registered through certification route – mid point audit during three

year registration period

Slide 62

designed to be proportionate.

• smaller provider with fewer workers and participants is not expected to present the

same evidence as a national provider with a larger workforce and many participants.

• Auditors will ensure that the way a provider demonstrates they meet each standard is

appropriate to their size, scale, and supports they deliver.

Slide 63

From our discussions with providers: challenges around availability of auditors in some areas

and costs do vary. Good practice to talk to a few different auditors and get quotes.

Worth talking to other providers about their experiences with auditors, to help you make

your selection.

Slide 64

Your service agreement

Slide 65

Need to have a service agreement with your participants

Governed by NDIS Terms of Business for registered providers and consumer law

Written agreement not a legal requirement (except for SDA)

NDIA not party to agreement but will take action if the terms do not align with the NDIS Act

2013 and NDIS Price Guide

Included in NDIS Practice Standards: Core Module (3. Provision of supports)

Slide 66

Core module 3: Provision of supports

Outcome:

Each participant has a clear understanding of the supports they have chosen and how they will be provided

### Slide 67

#### Indicators:

Collaboration with each participant to develop service agreement

Each participant is supported to understand the service agreement and conditions using the language, mode of communication and terms they are likely to understand

Participant receives a copy of agreement, or a record is made of the circumstances under which the participant chose not receive a copy of their agreement.

# Slide 68

How, where, when, and at what cost, supports are delivered. Ideally this is outlined in the **Schedule of Supports** 

Sufficient and correct funding in the NDIS plan for the service

Who will pay for the services and create the service booking:

- self-managed participant
- plan manager
- agency-managed (claim directly from NDIS portal)

Payment times

How travel charges will be invoiced

# Slide 69

Responsibilities of the customer e.g. if they cannot make the appointment. (Ensure cancellation policies are in line with the NDIS Price Guide)

Responsibilities of the service provider e.g. if the service time needs to change

Solving problems and providing feedback

Notice arrangements (must not be less than 14 days)

### Slide 70

Contact details of the participant, nominee and the provider

Dates when the service will be reviewed and adjusted

How pricing will be updated and communicated

Type of services you provide are of a kind determined under the GST legislation to be GST free

# Slide 71

Who in your organisation has authority to sign?

Does your participant have capacity to enter into a contract?

Is the language easy to understand?

reputation

Should a nominee or guardian sign off or, if unavailable, can you get a letter of support from a Public Advocate?

### Slide 72

Stress test your agreement for NDIS changes, e.g. flexibility of plan budget across supports, change to cancellation policy, pricing changes etc

But just because your agreement allows you to – for example, change your fees or cancellation policy – doesn't mean you should....

For example, price guide increases are not always matched by a corresponding increase in participants' plans – meaning that if your charge more, they have less budget available for future, or other services

- Consider the impact on participants and your customer relationship and
- o Communicate any changes being implemented

### Slide 73

Support planning

# Slide 74

Practice standards consider how you engage with your participants to plan their support.

### Outcome:

Each participant is actively involved in the development of their support plan

Plans reflect participants needs, requirements, preferences, strengths and goals and are regularly reviewed

### Slide 75

#### Indicators:

- Work with participant and support network to enable effective assessment and develop support plan. Information is sought from a range of resources to ensure needs, support requirements, preferences, strength and goals are included.
- Risk assessment for support plan in collaboration with each participant is completed and documented, strategies to treat known risks are planned and implemented
- Periodic review of the effectiveness of risk assessment are undertaken with each participant's support plan and changes made when required

Risk assessment for participants is mandatory, and it is an area causing some nonconformances for providers

### Slide 76

#### Indicators:

- Annual review of support plan or earlier in collaboration with participant. Progress in meeting outcomes and goals is assessed at a frequency relevant and proportionate to risk, the participant's functionality and wishes
- Information on support plan is communicated to family members, carers, other providers, government department where appropriate and with consent of the participant

# Slide 77

Managing risk in the NDIS

# Slide 78

If you don't manage risk effectively, more likely to end up with complaints and incidents

You can use indicators to develop your risk register. Example – exercise with Board to work through relevant quality indicators – where confident, where risk?

### Risk categories:

- Participant
- Workers
- Business/financial
- Reputation

Risk register template in activity worksheet

### Slide 79

Applying quality, compliance and risk to your business

# Slide 80

New providers – some questions to consider.

# Do I have to be registered to deliver my planned service?

 Service design – registration and standards requirements. What does this mean re staffing etc

# Do I want to be registered to access the full NDIS market?

– market information may inform decision re whether to register – e.g. level of plan/self management in your target market.

# Do I want to register to demonstrate commitment of NDIS Quality Standards?

-again, worth looking at where your competitors stand on this.

# Can I run a financially viable service with/without registration?

Consider impacts on costs – but also benefits re service quality, positioning

If you decide not to register, the Code of Conduct still applies

# Slide 81

Check whether your preferred registration group means registration via verification or certification route

Do you and your workers understand and apply the NDIS Code of Conduct? – complete the online training module

Understand the relevant quality standards, outcomes and indicators for your reg group

### Slide 82

Check that you have the appropriate professional qualifications to deliver your planned service

Ensure you have provisions in place for:

- Complaints management
- Incident management
- Worker screening

Check you have documentary evidence to demonstrate compliance

#### Slide 83

Sole traders: may be viable to operate with plan and self managed participants only – may already have clients that are outside the NDIS

Registration commitments are likely to be lighter touch – but balance against the costs/benefits

Clients possibly less concerned about you not being registered – depending on service you provide

If you want to grow – may still need to register to access broader market

Larger providers – likely to need to access full market

#### Slide 84

Can I deliver my new or expanded service within my existing registration groups?

-Or do I need to go through the registration process for new groups?

Do I need to scale up my quality and compliance arrangements in proportion to my growth?

-If you're growing, what needs to scale with you

What do I need to do to prepare for my mid-term or recertification audit?

- Are you prepared for your audit, particularly if not been audited under NDIS before

# Slide 85

Resources and agencies available to help you prepare for audit:

Policy development: off the shelf or bespoke

-Be careful about this. A generic policy won't necessarily be adequate or relevant/practical for you, and if you haven't been actively involved in developing it, less likely to own and commit to it

Pre-audit checks and gap analysis: help you to identify what you have already, and what you still need

### Look for:

- Thorough understanding of NDIS and your registration group
- Experience and confidentiality: should be able to talk about work they've done for other clients, without breaking confidences
- Engagement can you work with them, do you trust them?
- Critical friend will they be honest with you, and supportive?

### Slide 86

NDIS arrangements change frequently – e.g cancellation policy, level of flexibility in how you use your funding.

Keep up to date:

- NDIA
- Commission
- Peak and professional bodies
- News and blogs
- Conferences, events, webinars

# Slide 87

So what should you do after watching this webinar?

Please review the questions in this weeks' Activity worksheet and the business plan template

Please join the Linked in group and post a question or like a question so we know which questions to address first.

Q&A session will be available on 2 June – via LinkedIn group or email ndis@cbb.com.au

#### Slide 88

NDIS Success Roadmap – what's next

# Slide 89

In our next webinar we will talk about ....

The webinar 'Strategies for success' will be available on the **9 June. Look at marketing** strategy to grow your business

Second part of the NDIS Success program is the NDIS Success Guide – you can apply to be one of eight organisations nationwide who will work with our consultants to develop your NDIS idea from a business plan to the pilot stage

Our consultants will work with you to develop an action plan to get your idea off the ground, to help you progress your idea to pilot stage, and provide direct support in key areas where they would add most value

Apply online – applications open late May through to 24 June

You can apply at any time now –

- -May be asked to resubmit business plan before final decision
- -Need to watch all six webinars in the management series by end June
  - Thanks for watching 'Compliance, Quality and Risk'
  - Bye for now

# Slide 91

Thank you