

**Department of Education
and Early Childhood
Development**

**Standard Cost Model Measurement
of amendments to the process of
Education Maintenance Allowance
payments**

10 October 2008

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Statement of responsibility

This Report was prepared for the Department of Education and Early Childhood Development as set out in our engagement letter dated 1 July 2008. The methodology adopted for this costing exercise is consistent with the requirements of the Victorian Standard Cost Model, as outlined in the Victorian Guide to Regulation, and is a non-statistically significant estimate of the administrative burden.

In preparing this Report we have relied on the accuracy and completeness of the information provided to us by the Department of Education and Early Childhood Development, information collected through interviews with five schools and from publicly available sources. We have not audited or otherwise verified the accuracy or completeness of the information. We have not contemplated the requirements or circumstances of any one other than the Department of Education and Early Childhood Development.

The information contained in this Report is general in nature and is not intended to be applied to anyone's particular circumstances. This Report may not be sufficient or appropriate for your purposes. It may not address or reflect matters in which you may be interested or which may be material to you.

Events may have occurred since we prepared this Report which may impact on it and its conclusions.

We do not accept or assume any responsibility to any one other than the Department of Education and Early Childhood Development in respect of our work or this Report.

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1 Introduction

1.1 Summary

DEECD has proposed to change the Education Maintenance Allowance (EMA) payment process from a cheque-based system to an electronic funds transfer (EFT) system. The proposed change, and hence the Standard Cost Model (SCM) measurement outlined in this report is a process change (as opposed to a regulatory amendment) that is expected to reduce the administrative burden on Victorian schools.

The outcomes of the SCM measurement are provided in the table below. It is expected that changing the EMA payment process will reduce the administrative burden on Victorian schools by approximately \$1.27 million per annum.

Table 1: Net impact on the administrative burden of Victorian schools

Victorian schools	
Activity	Net impact on administrative burden
Victorian schools	-\$1,270,560
Non-government schools	-\$256,709
Government schools	-\$1,013,851

1.2 Education Maintenance Allowance

The Education Maintenance Allowance (EMA) is provided by the Victorian Government to low income families to assist with the cost of educating their children. The EMA is a means tested payment, paid to eligible parents/guardians of students under 16 years of age. The students must be attending a government or registered school in Victoria.

To be eligible the applicant must:

- be an eligible beneficiary of a Centrelink pension, allowance or benefit within the meaning of the State Concession Act 1986; AND be a holder of either a Health Care Card or a Pensioner Concession Card or
- be a Veteran Affairs (TPI) pensioner; or
- be a foster parent; and
- submit an application to the school by the stipulated dates.

The Education Maintenance Allowance is outlined in the *Education and Training Reform (Education) Regulations* and is regulation 100 – Grant of Education Maintenance Allowance¹.

¹ *Education and Training Reform (Education) Regulations*: Regulation 100 – Grant of Education Maintenance Allowance:

- (1) On an application in accordance with this Division, and on the recommendation of the Secretary, the Minister may grant an education maintenance allowance.
- (2) For the purposes of subregulation (1), the Secretary may recommend that an education maintenance allowance in respect of a student be paid—
 - (a) wholly to the applicant; or
 - (b) wholly to the school the student attends; or

For 2008 the total allowance was \$430 for secondary students and \$215 for primary students. 50 per cent of the payment is provided to the student's school and 50 per cent is provided to the student's parents/guardian. The EMA is paid in two instalments each year. In the first instalment for 2007, the EMA was paid to approximately 213,000 students at a total of \$40.6 million.

The *Parent Payments in Victorian Government Schools*² policy document, released by DEECD in 2008, outlines the EMA process and states the following:

- families in receipt of the EMA must not be pressured to sign over their portion of the EMA
- the school's portion of the EMA cannot be used to offset voluntary financial contributions
- any portion of the EMA not expended by the end of the year must be returned to the parent/guardian unless there is agreement by the parent/guardian that this money can be carried over into the next year
- the school must ensure that it has a transparent process for the administration of the EMA.

1.3 The EMA payment process

DEECD has proposed to change the EMA payment process from a cheque-based system to an electronic funds transfer (EFT) system. The proposed change, and hence the SCM measurement outlined in this report is a process change (as opposed to a regulatory amendment) that is expected to reduce the administrative burden on Victorian schools³.

1.3.1 Current process

One half of the EMA is paid to the parents and guardians through the school (currently via a cheque sent to the school for distribution), and the other half of the EMA is paid to the school to expend on behalf of the student following consultation with the parent/guardian (currently paid directly to the school by EFT).

Cheques are sent in bulk to schools for distribution to families. It takes approximately two weeks from the time that the file is sent to the bank to the time when the cheque arrives at the school for the school to distribute to families. Approximately 312,000 EMA cheques per annum are distributed by schools to parents.

(c) in the proportions that are determined by the Secretary, partly to the applicant and partly to the school the student attends.

(3) If the Secretary recommends that the whole or part of an education maintenance allowance is payable to the school, the whole or the part of the allowance must be used for the direct benefit of the student.

² DEECD, 2008, *Parent Payments in Victorian Government Schools*,

http://www.eduweb.vic.gov.au/edulibrary/public/schacc/Parent_payments_policy_2008-pol-v1.00.pdf

³ The Victorian Guide to Regulation (page 4-33) defines administrative burdens as those costs incurred by businesses: to demonstrate compliance with state regulation; to allow the State Government to administer the regulation. These costs include costs associated with: familiarisation with the requirement; record keeping to meet the requirement; reporting, including inspection and enforcement of regulation.

Requiring schools to handle parent's EMA cheques places administrative burden on schools including:

- checking cheque receipts against application forms
- informing parents their cheques have arrived
- distributing cheques by post and/or requesting parents to pick-up their cheque
- chasing up on un-presented cheques
- handling requests for lost cheques to be re-issued.

In addition, the cheque payment process:

- costs DEECD for cancellation and re-issue of cheques (approximately 2,770 cheques get cancelled each year at a cost of approximately \$15,240)
- is inconvenient to parents as they:
 - have to wait up to two weeks for the cheque issuing process to receive their payments
 - are sometimes requested to come to the school to pick up their cheque
 - have to take the cheque to the bank
 - (if a cheque is lost) have to chase up with the school, and wait again for a re-issue of their cheque
- in some instances fails the policy objectives of the EMA as some families eligible for the payment do not received it (it was found that from 2001 to 2006 there were 28,500 EMA cheques at a value of \$1,090,172 that have not been presented).

1.3.2 Pilot process

In term three 2008, a pilot program consisting of five schools (non-government, government, primary and secondary) has been conducted to trial the instalment two payment of EMA to parents by Electronic Funds Transfer (EFT).

At the pilot schools, parents were requested to add their bank account details to EMA application form.

For those parents who provided their bank account details (44 per cent of EMA applicants), the parent EMA portion was paid directly into their nominated bank account. The school EMA portion has continued to be paid by EFT directly to the school in accordance with the existing arrangements.

Under the EFT process, schools are no longer required to handle parent cheques. The EFT process eliminates a number of administrative activities undertaken by schools, including:

- checking cheque receipts against application forms
- informing parents their cheques have arrived
- distributing cheques by post and/or requesting parents to pick-up their cheque
- chasing up on un-presented cheques
- handling requests for lost cheques to be re-issued.

DEECD has proposed that the payment of EMA to parents by ETF will be implemented in all Victorian schools in term one of 2009 and cheques will no longer be issued.

2 Background

2.1 Reducing the Regulatory Burden

Under the *Reducing the Regulatory Burden* initiative, the Victorian Government made a commitment to cut the existing administrative burden of regulation by 15 per cent over three years and 25 per cent over five years.

The RRB initiative encompasses any requirement imposed on businesses and the not-for-profit sector under state legislation.

While reduction in the administrative burden to state government schools is important, the scope of the RRB project excludes the regulatory burden of government organisations. Hence only the administrative burden savings of non-government schools can be counted towards the Victorian Government's RRB target.

2.2 DEECD Reducing Red Tape Project

While the overarching RRB project has focused on non-government organisations, DEECD's Reducing Red Tape project aims to identify ways to reduce administrative burden or red tape on both non-government and government schools and early childhood development service providers.

The administration of Education Maintenance Allowance was identified as an area of administrative burden through a state-wide consultation process involving stakeholders representing both the peak organisations interested in school education in Victoria, and schools from both the government and non-government sectors. The recommendation from the consultation report was that the processes for administering the EMA be reviewed to investigate the feasibility of direct payments to parents.

In most cases the RRB initiative results in a change in the administrative burden through changes in regulation, however in the case of the EMA, changes in the burden are due to changes in the process of administering the regulation, which also falls within the scope of the initiative.

2.3 Standard Cost Model

Progress towards achieving targeted reductions in administrative burdens is measured using the Victorian Standard Cost Model (Appendix F in the *Victorian Guide to Regulation*). The Standard Cost Model was developed by the Dutch Government to provide a consistent method for estimating the administrative costs imposed on business by government.

The focus of an SCM measurement is on the incremental, ongoing administrative burden. The Standard Cost Model is designed to produce indicative estimates of burdens, and to develop a strong understanding of the drivers of these costs. However, the SCM is not designed to provide statistically robust data.

The SCM measurement in this report provides an estimate of the change in administrative burden as a result of changes to the EMA parent payment process. The measurement exercise has been conducted in accordance with the SCM requirements.

3 Overview of the burden

The administrative burden placed on schools is reduced by adopting an EFT payment method instead of the prior cheque payments. It is important to note that while it is expected that both parents and DEECD would experience a reduction in administrative burden from the EFT payment method this SCM measurement only captures the benefits experienced by schools.

The activities associated with the existing payment method (cheque) and the trialled payment method (EFT) have been divided into three categories:

- processing cheques - which only applies to the existing system
- processing 'lost' cheques, which can include chasing up on un-presented cheques, requesting cheques to be reissued etc - which also only applies to the existing system
- processing rejected EFT payments - which applies only to the piloted system.

It has been assumed, and tested through the interviews with the pilot schools, that the time taken to apply for the EMA does not change.

As demonstrated in table 2, it is expected that amending the payment process of parents' EMA payments from a cheque system to an EFT system will reduce the administrative burden of all Victorian schools by an estimated \$1,270,560 per annum.

Table 2: Net impact on the administrative burden of Victorian schools

Victorian schools			
Activity	Existing administrative burden	Proposed administrative burden	Net impact on administrative burden
Processing cheques	\$1,176,466		-\$1,176,466
Processing 'lost' cheques	\$115,496		-\$115,496
Processing rejected EFT payments		\$21,402	\$21,402
TOTAL	\$1,291,962	\$21,402	-\$1,270,560

As discussed in section 2.1, only the change in administrative burden to non-government schools can be counted towards the Government's RRB target. Given this, table 3 and 4 provide a breakdown of the impact on administrative burden for non-government schools and government schools separately.

As demonstrated in table 3, it is expected that amending the payment process of parents' EMA payments from a cheque system to an EFT system will reduce the administrative burden of non-government schools in Victoria by an estimated \$256,709 per annum.

Table 3: Net impact on the administrative burden of non-government schools

Non-Government schools			
Activity	Existing administrative burden	Proposed administrative burden	Net impact on administrative burden
Processing cheques	\$237,698		-\$237,698
Processing 'lost' cheques	\$23,335		-\$23,335
Processing rejected EFT payments		\$4,324	\$4,324
TOTAL	\$261,033	\$4,324	-\$256,709

As demonstrated in table 4, it is expected that amending the payment process of parents' EMA payments from a cheque system to an EFT system will reduce the administrative burden of government schools in Victoria by an estimated \$1,013,851 per annum.

Table 4: Net impact on the administrative burden of government schools

Government schools			
Activity	Existing administrative burden	Proposed administrative burden	Net impact on administrative burden
Processing cheques	\$938,768		-\$938,768
Processing 'lost' cheques	\$92,161		-\$92,161
Processing rejected EFT payments		\$17,078	\$17,078
TOTAL	\$1,030,929	\$17,078	-\$1,013,851

Summary of SCM measurement exercise

3.1 Standard Cost Model calculation

These cost parameters give the basic Standard Cost Model formula:

Standard Cost Model Formula	
Administrative Cost	= Price x Quantity
	= (tariff x time) x (population x frequency)

For each activity the tariff, time, population and frequency was estimated through a combination of actual data and estimates provided through the interview process (see table 5 below). Section 3.2 and 3.3 describes this process in more detail.

Under the current EMA payment process it was estimated that there was an administrative burden of \$1,291,962 imposed on Victorian schools. Under the EFT EMA payment process, this administrative burden would no longer exist. However, there is expected to be an administrative burden associated with processing rejected EFT payments (estimated to be \$21,402). The net impact of changing the EMA payment process is expected to reduce the administrative burden on Victorian schools by \$1,270,560 million per annum.

Table 5: Standard Cost Model calculations – Victorian schools

	Administrative Cost¹	Price²	Population	Frequency per annum³
Existing burden				
Processing cheques	\$1,176,466	\$3.78	155,679 ⁴	2
Processing 'lost' cheques	\$115,496	\$8.36	6,906 ⁵	2
Proposed change to the burden				
Processing rejected EFT payments	\$21,402	\$2.16	4,958 ⁶	2
Net impact				
Administrative Cost Total	-\$1,270,560			

Notes: ¹ Minor differences in the administrative cost occur due to rounding treatment ² Price = tariff (wage rate x 75% on costs) x average time taken to complete task; ³ Number of times per year activity occurs; ⁴ Number EMA recipients; ⁵ Estimated number of lost cheques per instalment (based on 2007 DEECD data); ⁶ Estimated number of rejected EFT payments (based on experience from pilot schools).

3.2 Cost parameter assumptions

3.2.1 Tariff

Estimations of the value of the time taken to process EMA payments to parents have been provided during the interviews, on an hourly basis. These amounts varied between \$20 and \$25 per hour. This is in a consistent range with the amount reported by the Australian Bureau of Statistics in Catalogue Number 6306.0, Table 1a, ANZSCO occupation code 561, Clerical and office support workers. The wage rates reported in each interview were used for the calculation of administrative costs, with the average of these costs used to estimate the overall burden.

The default rate of 75 percent of the hourly wage rate as suggested in the *Victorian Guide to Regulation* is sufficient to measure overheads and on-costs, as there is no reason to suggest otherwise.

Other costs included in the analysis include:

- postage – calculated to be 50c per item
- envelopes – calculated (from bulk prices) to be 5c each
- telephone calls – assumed to be 40c per call.

Depreciation of assets, such as computers and printers, is accounted for in the calculation by way of the 75 percent loading applied to the hourly wage rate.

3.2.2 Time

The pilot required schools to contact the parents and resubmit the application forms with the parents' bank account details. In some instances this required a significant amount of time in issuing information letters, handling telephone questions etc. However it is assumed that this time was a start-up cost associated with the adoption of a new process and not considered to be an ongoing administrative burden. Hence it is assumed that there is no additional time taken to process an EMA application with the BSB information. This assumption was tested and confirmed during the interview process.

It is assumed that the cost of processing each EMA payment is the same regardless of the number of payments to be processed, that is there are no significant efficiency gains achieved by processing an increased number of payments.

3.2.3 Quantity

It is assumed that the population can be calculated as the number of payments, rather than the number of students, as the application and payment is made per family rather than per student. Hence it does not take longer to process the application or handle the cheque/payment when it is for more than one child.

Table 6 provides the 2008 EMA recipient data for instalment one.

Table 6: Population data for EMA recipients

	Families	Students
Government Schools	124,225	165,875
Non Government Schools	31,454	43,472
Total	155,679	209,347

Only the number of applicants (rather than number of recipients) was known for instalment two at the participating pilot schools. Based on historical data the difference between applicants and recipients was minimal, hence the applicant numbers were used as a proxy.

3.2.4 Frequency

While the pilot required parents to resubmit the application form (to provide their bank account details), it is assumed that the application process occurs once per year and that the payment process, whether by cheque or EFT occurs twice per year.

It has been assumed that 4.4 per cent of cheques are lost per instalment. This is based on the percentage of un-presented cheques in 2007, according to DEECD data.

It has been assumed that 3 per cent per cent of the EFT applications were rejected. This assumption was estimated through the interview process. In most cases this was because the wrong bank account details were provided.

If the EFT payment process is rolled out to all schools, it is assumed that all EMA payments will be made using the EFT process.

3.3 Empirical data collection strategy

Data was collected through five interviews conducted on 25 and 26 of August 2008. The interviews were structured around a questionnaire to determine the time taken to process the EMA parent payments both prior to the pilot and during the pilot (see Appendix B).

DEECD determined that the schools involved in the pilot of the new EMA process were the most appropriate candidates for the empirical data collection process. The five schools chosen to participate in the pilot program represent potential segmentations of the market (i.e. socio-economic mix, school type). This has helped to identify the 'normally efficient' school.

The characteristics of the schools that participated in the pilot and were interviewed as part of the SCM measurement exercise are shown in the table below.

Table 7: Characteristics of interviewed schools

School	Type of school	Number of students	Number of EMA applicants
School 1	Non-government secondary school	766	64
School 2	Government secondary school	469	388
School 3	Government primary school	439	192
School 4	Non-government primary and secondary school	977	56
School 5	Government special school	62	59

3.4 Empirical data standardisation process

The data collected from the interviews with the schools who participated in the pilot was standardised to provide an estimate for a normally efficient school.

Standardisation of cost per activity

For each of the activities measured, the cost to a normally efficient school has been estimated by taking an average of the total cost per activity from the interview results (see table 8 below). While there is some variation in the time taken between schools to process a lost cheque, based on the interview responses we have assumed that the variation was not an issue of segmentation (i.e. there was no trend between variation in time taken and variation in type of school) rather an unavoidable outcome of gathering empirical estimates for an activity based costing exercise. That is, when people are not experienced in recording their activities, some people will tend to over estimate their time and others will underestimate.

Sensitivity testing on the impact of the variation in the time taken between schools to process a lost cheque has found that there is an impact of less than 2 per cent on the final results⁴; hence it was determined that a simple average of all the results was appropriate.

Table 8: Cost per activity - interview results

	Activity									
	Tariff (per min wage rate + oncosts)	Processing cheques			Processing 'lost' cheques			Processing rejected EFT payments		
		Time (minutes)	External cost ⁵	Total cost per activity	Time (minutes)	External cost	Total cost per activity	Time (minutes)	External cost	Total cost per activity
School 1	\$0.64	2.5	\$0.55	\$2.15	N/A ¹	N/A ¹	N/A ¹	N/A ²	N/A ²	N/A ²
School 2	\$0.70	5.8	\$0.55	\$4.61	12	\$0.55	\$8.95	2	\$-	\$1.40
School 3	\$0.73	7	\$-	\$5.10	10	\$-	\$7.29	N/A ³	N/A ³	N/A ³
School 4	\$0.64	2.5	\$0.55	\$2.15	20	\$-	\$12.83	N/A ⁴	N/A ⁴	N/A ⁴
School 5	\$0.58	7.2	\$0.67	\$4.87	7.5	\$-	\$4.38	5	\$-	\$2.92
Average cost per activity				\$3.78			\$8.36			\$2.16
Frequency per annum				2			2			2
Population				155,679			6,906			4,958
TOTAL				\$1,176,466			\$115,496			\$21,402

Notes: ¹ No lost cheques; ² No EFT payments rejected; ³ Rejected EFT payments not handled at time of interview; ⁴ No EFT payments rejected; ⁵ External cost relates to non-time costs, such as telephone usage and postage, external costs vary due to differences in the processes followed by each school.

⁴ The sensitivity testing involved removing the possible outliers for the costs of processing 'lost' cheques (School 4 and School 5) from the estimate of the burden and re-calculating the total change in administrative burden. For the three sensitivity tests conducted (1. Remove School 4; 2. Remove School 5; 3. Remove both School 4 and 5) the variation between the reported results and the results of the sensitivity tests on the total change in the administrative burden were less than 2 per cent.

Standardisation of frequency of rejected EFT payments

To estimate the frequency of rejected EFT payments occurring, it was considered that school 3 was an outlier and was removed from the calculations of a normally efficient school (see table 9 below).

Table 9: Percentage of lost cheques/rejected EFT - interview results

School	Rejected EFT	EFT Applications
School 1	0*	33
School 2	4	70
School 3	12	176
School 4	0*	29
School 5	1	25
Total	17	333
Percentage calculated from all responses		5.1%
Percentage calculated from 'normally efficiency responses'		3.2%

Notes: * No EFT payments rejected.

Appendix A: Bibliography

Australian Bureau of Statistics, 6345.0 Labour Price Index, June 2007, Australia

Education and Training Reform (Education) Regulations 1997

DEECD, Education Maintenance Allowance, Policy Information,
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Government of Victoria, 2007, *Victorian Guide to Regulation*, Department of Treasury and Finance, Melbourne

Appendix B: Questionnaire

EMA system – EFT Payment Pilot

Schools Questionnaire

School EMA processes – BEFORE PILOT

1. How long would you estimate it typically took to process a new EMA application, from initial assistance to the parent in completing the application form (if applicable), to adding and saving the application in the EMA system?

Case where parent required assistance : _____ mins

Approximate % of your applications in this category: _____ %

Type of inquiries/assistance required (e.g. related to eligibility, method of payment, payment timing etc.)

Case where no assistance required, predominantly just entering the application into EMA: _____ mins

Approximate % of your applications in this category: _____ %

Other comments:

2. What does the school do with the EMA Application Forms once they are entered into the EMA system? That is, are they stored on-site, off-site, shredded?

3. What were the processes for handling a parent cheque once it arrived at your school until it was handed to a parent?

Processes may include filing cheques, contacting parents to collect cheques, distributing to parents from the school, distributing to students or mailing to parents addresses.

4. How long would you estimate it took to complete the process of handling a parent cheque once it arrives at your school until handed to a Parent?

5. Where applicable to your school, include times such as the time taken to register the cheque, file the cheque, notify the parent, locate the cheque when the parent comes to collect it, and have the parent sign for the cheque.

_____ mins

If there is a significant variation for specific circumstances (such as language issues):

Reason(s) for variation: _____

Least time taken : _____ mins

Approximate % of your applications in this category: _____ %

Greatest time taken: _____ mins

Approximate % of your applications in this category: _____ %

Other comments:

6. How long would you estimate it took to handle a request for a cheque replacement (your time in total, excluding waiting for actions by Head Office)?

Include typical time taken with parents.

Time taken: _____ mins

Approximate % of your applications in this category: _____ %

Other comments:

7. How long would you estimate it took to return a cheque (either to have the cheque reissued or to return a cheque and cancel the application)?

Include typical time taken with parents.

Time taken: _____ mins

Approximate % of your applications in this category: _____ %

Other comments:

School EMA processes – DURING PILOT

1. How long would you estimate it typically took to update a 2008 EMA application, from initial assistance to the parent in completing the application form (if applicable), to adding and saving the application in the EMA system?

Case where parent required assistance : _____ mins

Approximate % of your total applications in this category: _____ %

Type of inquiries/assistance required (e.g. related to eligibility, method of payment, payment timing etc.)

Case where no assistance required, predominantly just entering the application into EMA: _____ mins

Approximate % of your total applications in this category: _____ %

Other comments:

2. Given the additional financial information contained in the EMA Application Forms have you amended your storage/disposal process of the forms once they have been entered into the EMA system?

3. Did you have to handle any rejected EFT payments? Yes / No

Approximate percentage of EFT payments rejected _____%

If Yes, were you able to correct and resubmit some of these? Yes / No

Approximate percentage of EFT payments rejected that could be corrected

_____ %

How long would you estimate it took to handle a rejected EFT transaction where the bank account details could be corrected?

_____ mins

Approximate percentage of EFT payments rejected that could not be corrected

_____ %

How long would you estimate it took to handle a rejected EFT transaction where the bank account details could not be corrected and you had to consult with Head Office?

_____ mins

Other comments:

The SCM measurement requires an estimate of the wage rate of the person undertaking this activity. We have estimated \$22 per hour. Would you consider this a reasonable estimate? If not, are you able to provide an estimate?
