

Fees, Statements and Parent Gap Fee Payment Policy

1. Purpose

My Place Family Day Care (FDC) is committed to establishing consistent fee charging practices for all Educators and families within the communities in which we operate. This policy helps to ensure families understand the fee schedules and payment process required for education and care to be provided for their child.

This policy also demonstrates our commitment to strictly adhering to all legislative requirements and how we maintain financial integrity and comply with all Child Care Subsidy legislative requirements. My Place FDC has established compliance systems to ensure childcare funding is administered appropriately and our approved educators adhere to their responsibilities as 'fit and proper persons' under Family Assistance Law.

2. Scope

This policy applies to My Place FDC Nominated Supervisors, Coordinators, other staff, Educators, Educator Assistants, parents/guardians and children.

3. Definitions

Approved Provider: Inala Community House (ICH) has approval from the Federal Government to operate an approved FDC service.

Service: My Place Family Day Care, whose Approved Provider is Inala Community House.

Nominated Supervisor: Refers to the persons responsible for the day-to-day management of an approved centre/service. Nominated supervisors have a range of responsibilities under the National Law and National Regulations.

Parent/Guardian: The person responsible for the payment of fees and who is paid the Child Care Subsidy. Referred to as the Parent/s.

CCS: Child Care Subsidy is paid by the Federal Government. Its purpose is to assist families with the cost of childcare.

Centrelink: The Federal Government department which is responsible for the approval and calculation of CCS.

Payment Advice: Information from Centrelink via My Place FDC to the Educator regarding the breakdown of payments.

Statement of Entitlement: Information from Centrelink via My Place FDC to the Parent/Guardian regarding the breakdown of payments and hours of usage.

CSF: Child Service Fee is payable by parents to My Place Family Day Care and assists with the running of the Service.

Redbourne: The 3rd Party Software Provider of My Place FDC whose software package (Harmony) allows the Service to claim subsidies from the Federal Government.

Harmony: The software package used by My Place FDC.

redPAY: Software used to administer the child care subsidy to families accounts, including invoicing and receipting of child care fees.

PIN: Personal identification number or electronic signature.

Intended Care: Hours related to the parent's needs.

ACCS: Refers to Additional Child Care Subsidy that provides extra help with the cost of early childhood education and care to families facing difficult or challenging circumstances. ACCS will usually cover all of a child's early childhood education and care fees.

4. Policy

My Place FDC is committed to maintaining equitable and clear fee processes to safeguard the interests of our service, Educators and families.

This policy, in conjunction with the related procedures, outline the guidelines relating to the setting and payment of fees and the distribution of statements.

4.1. Setting of Fees

My Place FDC fees are well communicated to ensure clarity and transparency, and to support informed requests for care.

Approved Educators operate as self-employed small business owners. They set their own fees, days of operation and minimum hours for provision of education and care within the parameters set by My Place FDC, as the Approved Provider. Educator's proposing to charge outside of these parameters, must discuss this with the Coordination Team and receive approval from the Service prior to making any fee adjustments. Educators must provide families and the Service with at least 28 days' notice of any change in fees and charges.

During induction and orientation Educators are advised they must meet their obligations under the Family Assistance Law and A New Tax System (Family Assistance) (Administration) Act 1999 regarding setting of fees, ensuring the following:

- Educators do not charge an individual more than the usual Child Care Subsidy hourly session fee who may be eligible for Additional Child Care Subsidy (ACCS) or who receives a prescribed payment,
- Educators do not change fees during a particular event or circumstance (for example during a service closure).

My Place FDC does not permit the charging of a bond to families and does not support private arrangements regarding fees or the provision of care. The Child Service Fee (CSF) is payable by parents/guardians to My Place FDC and will be deducted from any CCS received by ICH on a weekly basis prior to it being passed on to the Educator.

4.2. Child Care Subsidy (CCS)

My Place FDC is approved to administer the CCS to families who meet eligibility guidelines (including residency, activity and immunisation). This payment reduces the out-of-pocket expenses for families. CCS rules require families make a co-contribution by paying the gap fee (see Section 4.3 below).

Children may also be entitled to ACCS payments, these will be managed in accordance with guidelines and requirement.

Neither the Educator or the Service are directly responsible for determining a child's eligibility for CCS or the calculation of a parent/guardian's CCS entitlements. This is done through Centrelink and parents/guardians must deal with them directly to resolve any issues which may arise relating to this. Privacy laws prohibit My Place FDC or the Educator from contacting Centrelink on a parent/guardian's behalf.

4.3. Payment of Parent Gap Fees

The CCS is not sufficient to completely cover a parent's childcare fees and an amount will be left outstanding. This outstanding amount is referred to as the 'gap fee' and must be paid by parents as their co-contribution to their childcare fees. My Place FDC is responsible for ensuring all gap fees are collected electronically and that processes are in place to ensure this is occurring for each parent/guardian, including the requirement for evidence to demonstrate this is occurring.

Fees are to be paid weekly through a direct debit system. If families wish to pay fees on a fortnightly or monthly basis, negotiations will need to be made with the Service, and it will be a requirement for their account to be in advance and not in arrears.

Families with accounts in arrears will be managed as per the Overdue Account Procedures including relevant actions such as cancellation of care and debt collection. The commitment to follow policies, including payment of the parent gap fees are a condition of enrolment. Enrolment will be cancelled or suspended where fees are not paid or otherwise remain overdue. Families experiencing difficulty with payment are encouraged to discuss this with their Educator to explore possible solutions.

In the event My Place FDC makes changes to the amount or the way in which fees are charged, this will be communicated with at least 28 days' notice before any changes take effect. Communication will occur via email, notices and newsletter updates.

4.4. Statement of Fees

The service will issue a Statement of Fees to account holders each week, consistent with the billing cycle. Gap Fee payments will be receipted through the Service's third-party Child Care Management System (redPAY). Account holders (parents/guardians) are to notify My Place FDC or their Educator, if they believe there is an error in their billing or fees charged.

5. Responsibilities

Approved Provider:

- Maintain compliance with Family Assistance Law, Education and Care Services National (Queensland) Law 2011 and Education and Care Services National Regulations 2011 and any other applicable laws relating to operating a family day care service by remaining up to date through annual training and remaining informed of related legislation and best practice.
- Nominate responsible people for the accuracy of data submitted (Nominated Supervisor and other) to the Department of Education Early Childhood in relation to the administration of the Child Care Subsidy CCS.
- Ensure induction and orientation programs inform educators and families of CCS fraud detection measures relating to attendance records and electronic gap fee payments.
- Accounting/financial records are reconciled by a registered Accountant at least annually.
- Maintain records of parent gap fee payments for the required timeframes as per the Family Assistance Law.
- Conduct regular financial meetings with administration staff undertaking review of all reports for accuracy. Reports of suspected or substantiated fraud will be addressed as a matter of priority and immediate action taken.
- Ensure all persons undertaking data entry responsibilities in the CCS Management System (Harmony) will undergo training. Training and additional information will be provided as needed or as identified for Administrative Staff.
- Identify potential situations where fraud can take place and implement a risk assessment approach using a risk matrix to develop strategies for minimisation or elimination of the risk.

Coordination Team (Nominated Supervisor, Coordinators):

- Maintain compliance with *Family Assistance Law, Education and Care Services National (Queensland) Law 2011 and Education and Care Services National Regulations 2011* and any other applicable laws relating to operating a family day care service by remaining up to date through annual training and remaining informed of related legislation and best practice.
- Through induction and orientation programs, Educators and families are informed of fraud detection measures relating to attendance records and electronic gap fee payments.
- Review Service fee schedule annually in accordance with budget development, any changes to best practice, legislation or incidents within the Service.
- Ensure all families are aware of the Fees, Statements and Payment of Gap Fees Policy.
- Provide families with educator fee schedules - these may be different for each Educator due to education qualifications, hours and days of care provided, overnight fees etc.

- Ensure child enrolments are submitted correctly with appropriate enrolment information.
- Provide families with regular statement of fees payable.
- Ensure family gap fee payments are managed and accounted for through electronic funds transfer. All gap fee payments will be receipted and applied against the family account in the service's CCMS 3rd party software to ensure compliance with regulatory requirements.
- Monitor family account balances to ensure payment of gap fees on a regular basis via electronic funds transfer. Family accounts with overdue or outstanding balances will be followed up by the Coordination Team.
- Discuss fee payments with families and terminating enrolment of children if fees remain unpaid.
- Review and update this Policy and associated procedures annually or in the event of suspected or substantiated fraudulent behaviour or practices or any other incident related to payment of fees.
- Provide at least 28 days written notice to families of any fee increases or changes to the way fees are collected.

Educators:

- Provide families with a meet and greet opportunity and explain your fee schedule including any transporting arrangements.
- Implement the fee schedule as written and NOT enter into any fee arrangement or additional payments with any family. Arrangements outside of the Service may result in the termination of the contract between the Service and the Educator. The Educator will record any additional services the families may access such as nappies, food, transport, etc.
- Not claim Child Care Subsidy if own child is in attendance at another family day care program on the same day, they (the Educator) or their partner is delivering an education and care program, unless the child has prescribed Information such as Certificate of ACCS, eligible disability or other recognised special circumstances.
- Record actual care sessions for each child's attendance in accordance with the eligible Complying Written Agreement and ensure records are completed and signed by the person dropping off or collecting the child (electronically signing children's attendance if the person dropping off does not fully complete and then to be electronically signed by an authorised person at next attendance)
- Record absences for the scheduled sessions, ensuring family's authorisation at the next attendance.
- When absences occur, notify the Coordination Team by phone or email within 24 hours or as soon as practicable.
- Maintain accurate attendance records and store all required records in accordance with legislative requirements.
- Report any suspected cases of fraudulent claims to the Australian Government Department of Education, Early Childhood tip off line and the Service.

- Ensure ALL records are stored confidentially and are accessible to the Coordination Team or Regulatory Authority on request.

Families:

- Provide the Service with the correct enrolment details to facilitate the CCS claim, if required, including:
 - Centrelink Reference Numbers (CRN) for child and CCS claimant
 - Date of Birth for child and CCS claimant.
- Notify Centrelink of any changes that may affect their CCS entitlement.
- Make regular fee payments in accordance with the fee schedule and avoid late fees and non-payments by ensuring an Electronic Funds Transfer (EFT) arrangement is in place and funds are available in order to clear all payments.
- Discuss with the Coordination Team any difficulty in meeting fee payments or any queries for suitable arrangements to pay outstanding amounts.
- All attendance records are accurately completed and are only to be completed for 'actual' attendances and absences if the child did not attend a scheduled session (care arrangements will be terminated if fraudulent claims are signed).
- Contact the Educator as soon as practicable, if their child is unable to attend a particular session of care.

6. Review

This policy shall be reviewed at a minimum every two years.

This policy remains in effect unless otherwise determined by resolution of the Board of Directors.

7. Related Documents

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to:

Regulatory Foundations

Education and Care Services National Law Act

- R.158 Children's attendance record to be kept by approved provider
- R.159 Children's attendance records to be kept by family day care educator
- R.160 Child enrolment records to be kept by approved provider and family day care educator
- R.168 Education and care service must have policies
- R170 Policies and procedures to be followed

Education and Care Services National Regulations

- R.158 Children's attendance record to be kept by approved provider
- R.159 Children's attendance records to be kept by family day care educator

- R.160 Child enrolment records to be kept by approved provider and family day care educator
- R.168 Education and care service must have policies
- R170 Policies and procedures to be followed

National Quality Standard

QA6 – Collaborative Partnerships with Families and Communities
 QA7 – Leadership and Management

Additional Regulatory Context and Guidance

- Australian Government, Department of Education, Child Care Services Handbook
- Family Assistance Legislation Amendment (Jobs for Families Child Care Package) Act 2017
- Family Law Act (parenting order) 1975 [S,64B (1); S63C(l)]
- A New Tax System (Family Assistance) (Administration) Act 1999: [No. 81]

Related Policies and Procedures

- Enrolment and Orientation
- Bookings and Cancellations of Care
- Grievance and Complaints Management
- Governance and Management
- Child Care Subsidy (CCS) and Additional Child Care Subsidy (ACCS) Management and Compliance

Forms

- Authority to Deduct
- Bank Deduction & Payment Authority
- Fee Schedule Educator Office Copy
- Fee Schedule Parent/Guardian
- Gap Fee Declaration Form
- Invoice & Receipt

Policy 7.2 Fees, Statements and Parent Gap Fee Payments			
Revision Register	Date of Last Update	Date Ratified and endorsed by board	Amendments
Revision 01	12/2024		New policy combined previous 10.4 Fees policy, 10.8 Fee procedures Updated format and enhanced procedures