

# CANCELLATIONS - FEE CHARGING AND COLLECTION POLICY AND PROCEDURE

Policy number		Version	3
Drafted by	Management Team	Approved by MC on	15.06.2020
Responsible person	Management Team	Scheduled review date	June 2021

Applies to: All Staff and Clients,			
Specific responsibility: Management Team & Management Committee			
Legislation / Standards or	National Disability Insurance Scheme Act 2013		
other external requirements	National Disability Insurance Scheme Rules and Guidelines 2018 -		
	2019		
	NDIS Price Guide 2020-2021 -		
	https://www.ndis.gov.au/providers/price-guides-and-		
	pricing#ndis-price-guide-2020-21-effective-1-july-2020		
	NDIS Terms of Business for Registered Providers		
	NDIS Quality and Safeguards Framework, 2018		
	NDIS Code of Conduct for Workers 2018		
	The Privacy Act 1988		
	Privacy Amendment (Enhancing Privacy Protection) Act 2012		
	Information Privacy Act 2000		
	Australian Charities and Not-for-profits Commission Act 2012		
	Associations Incorporation Act 2009		
	Associations Incorporation Regulation 2016		
Contractual obligations	NDIS Service Registered Service Provider obligations		
	Service Agreement		

#### **POLICY STATEMENT**

Early Connections - Coffs Coast is committed to -

- 1. Informing clients of their obligations and rights in relation to cancellations of appointments.
- 2. The effective management of staffing resources and the organisations financial sustainability.
- 3. Ensuring fee charging procedures are carefully considered and communicated in order to manage this process.

There are three types of cancellations referred to in this policy –

- 1. cancellations by centre
- 2. cancellations by family
- 3. no shows / late notice cancellations



To ensure the financial sustainability of the Organisation, fees need to be collected from client families when supports are delivered. If a family develops a pattern of cancellations / or no-shows this may place the Organisation in a position where we are no longer able to offer supports.

There is provision in the 2020 NDIS Price Guide for charging when participants make short-notice cancellations or are a no-show for scheduled appointments. "Where a provider has a Short Notice Cancellation (or no show) they are able to claim 100% of the agreed fee associated with the activity from the participant's plan, subject to this Price Guide and the terms of the service agreement with the participant. "

The NDIA have advised that providers can charge cancellation fees directly to participants, provided the arrangement is detailed in the Service Agreement between the participant and provider.

#### **SCOPE**

This policy applies to fees for services / supports provided under the National Disability Insurance Scheme (NDIS).

- Fees and charges are set out in the Service Agreement between Early Connections Coffs

  Coast and the client family.
- Early Connections Coffs Coast publishes a schedule of fees (Schedule of Supports document) for services in line with the prices which can be claimed under NDIS.
- Early Connections Coffs Coast further reserves the right to charge the client family for some
  costs related to cancellations over and above the participant's NDIS package, including travel
  costs.
- Where a quote for a service is requested by the National Disability Insurance Agency (NDIA),
   Early Connections Coffs Coast will develop one based on the actual cost of delivering the service, including organisational on-costs.
- Early Connections Coffs Coast will seek payment for supports and services in accordance with the relevant source indicated in the Early Connections Coffs Coast Service Agreement with each client family, i.e. NDIA, Plan Manager, or the individual where they are self-managing their funding package, or the individual where services have been agreed to above the funding included in the NDIS package (eg: travel fees over travel limits / annual limit / fees for services which have been cancelled late).



- Early Connections Coffs Coast may implement changes to fees, or increases to fees as set by the NDIA, as they occur throughout the year. The NDIS publishes a new Price Guide at the start of each financial year. Early Connections Coffs Coast will always refer to the new price guide to determine if fees will increase each year.
- All client families will be notified in advance via email of any pending fee increases.
   Comments and feedback from families will be requested prior to the increasing of fees.

#### FEES FOR TRAVEL TO PROVIDE THERAPY SUPPORTS

The 2019-2020 Price Guide states that - Providers can only claim travel costs from a participant in respect of the delivery of a support item if:

- the Support Catalogue indicates that providers can claim for Provider Travel in respect of that support item;
- the provider has the agreement of the participant in advance (i.e. the service agreement between the participant and provider should specify the travel costs that can be claimed);
   and
- the provider is required to pay the worker delivering the support for the time they spent travelling as a result of the agreement under which the worker is employed; or the provider is a sole trader and is travelling from their usual place of work to or from the participant, or between participants.

"Where a provider claims for travel time in respect of a support then the maximum amount of travel time that they can claim for the time spent travelling to each participant (for each eligible worker) is 30 minutes in MMM1-3 areas and 60 minutes in MMM4-5 areas. (Note the relevant MMM classification is the classification of the area where the participant is when the support is delivered.)

In addition to the above travel, capacity-building providers who are permitted to claim for provider travel in respect of a support item can also claim for the time spent travelling from the last participant to their usual place of work. The maximum amount of travel time that they can claim for the time spent on return travel (for each eligible worker) is 30 minutes in MMM1-3 areas and 60 minutes in MMM4-5 areas. (Note the relevant MMM classification is the classification of the area where the participant is when the support is delivered.)

Where a worker is travelling to provide services to more than one participant in a 'region' then the provider should apportion that travel time (including the return journey where applicable) between the participants, with the agreement of each participant in advance.

Claims for travel in respect of a support must be made separately to the claim for the primary support (the support for which the travel is necessary) using the same line item as the primary support and the "Provider Travel" option in the myplace portal. When claiming for travel in respect of a support, a



provider should use the same hourly rate as they have agreed with the participant for the primary support (or a lower hourly rate for the travel if that is what they have agreed with the participant) in calculating the claimable travel cost."

NDIS Price Guide 2020 - *Page 16-* <u>https://www.ndis.gov.au/providers/price-guides-and-pricing#ndis-price-guide-2020-21-effective-1-july-2020</u>

**NOTE:** Families in the MMM4 and MMM5 regions will be again informed of any changes to travel charges when meeting to discuss new service agreements and supports. When signing a new service agreement, we will notify all families of which MMM region applies to you and the associated permissible travel time that can be claimed.

#### **PROCEDURES** –

On enrolment with Early Connections – Coffs Coast a Service Agreement (including a Schedule of Supports) is negotiated and signed by both parties outlining the roles and responsibilities of the service provider and the child's family. This includes the following statement in regards to cancellations of appointments:

### "CHANGES TO SUPPORTS / NO SHOW / CANCELLATIONS"

In the event that either Party needs to make alterations to agreed supports or the manner in which supports are delivered, the party requesting the changes needs to give appropriate notice:

- For minor support changes such as a change to location for appointment, the participant must notify the service prior to 3pm the day before the appointment.
- For major changes such as changes to service delivery a minimum of 2 weeks' notice is requested,
- For changes to the day and time of scheduled appointments, notice is required by 3pm the day before the appointment,
- Where participants fail to present / cancel appointment (no show / fail to attend / cancel without appropriate notification being cancellations after 3pm the day before appointment, Early Connections Coffs Coast will charge a cancellation fee of up to a maximum 100% of that appointment fee within the period of the Service Agreement- as per NDIS Price Guide 2020.

When EC-CC cancels appointments, alternative supports will be offered where possible in an attempt to minimise disruptions for participants. For example, another member of the child's team may be



offered to take the appointment, or an offer of production of resources/reports etc. may be made in place of the appointment.

Should changes to supports become frequent, either or both parties may request a review of the Service Agreement, with any changes being in writing, signed and dated by both parties. Consistent and unreasonable frequency of cancellations or changes to supports may result in the suspension of supports.

Confirmation of appointments is required AND confirmation of no-attendance is required. Both can be done in the following ways —

- Responding Yes or No to sms reminders (scheduled and sent approx. 8am the day before appointment).
- NOTE: Last minute appointments i.e. Appointments that are booked a day before will not receive a text msg confirmation
- NOTE a 'No' response must be provided prior to 3pm the day before appointment to avoid
  a cancellation charge. If a 'No' response is received, please expect a call from our
  administration staff to offer alternative service or reschedule appointment.
- The Early Connections Coffs Coast Inc. administration team are contactable between the hours of 8am and 4.00pm. A message can also be left on the answering machine.
- Email: bookings@earlyconnections-coffscoast.org.au
- Ph: (02) 6652 8080

It is the responsibility of the client family to notify the Early Connections – Coffs Coast team member if the child is unable to attend an appointment. This is applicable for ALL appointment types:

- Home visits
- Preschool / Child Care / School visits
- Early Connections centre based sessions
- "Tele" Therapy sessions e.g. Skype, FaceTime, phone consultations.
- Scheduled meetings

A record of all cancellations will be made by the Early Connections – Coffs Coast team in the child's CRM file (Echidna).



Early Connections – Coffs Coast management will use their discretion in determining whether *No-Show appointments* will or will not be charged. For example, in extenuating circumstances it may be determined that this fee should be waived.

Itemised Invoices / Statements will detail the fee charged (at 100% of the usual appointment rate). Where the client family fails to attend, in excess of six hours, the Service Agreement may be discussed and continuation of service may be renegotiated (or ceased) with the client family. See "Suspension of Supports" statement in Service Agreement.

All disputes in relation to charges for Fail to Attend appointments are to be directed to the Program Manager and will be promptly responded to. The "Managing Complaints" process will be adhered to where applicable.

- When considering fees and charges to client families, Early Connections Coffs Coast is mindful of the complexity and challenges of modern family life with young children.
   Therefore, the organisation has set and structured our fee charging policies and procedures with families in mind, including –
  - Our hourly rate for supports and services is less than the NDIS recommended hourly rate for Early Childhood Intervention;
  - Our cancellation / no show fee is less than the NDIS recommended time frame of 10 days.

#### FEE COLLECTION -

- Early Connections Coffs Coast will seek payment for services and supports provided at each appointment after the parent/carer has signed a Service Agreement and a Schedule of Supports.
- All client families will receive a tax invoice for supports and services delivered via email. Tax invoices will be emailed weekly.
- All tax invoices must be paid within 3 5 working days.
- All payment should be made by EFT as described on the Tax Invoice.
- If payment is not received within 5 days of the date of the tax invoice, the client family will receive a reminder email / letter requesting payment is received within 3 working days.



- If payment is still not received, a Letter of Demand will be sent to the client family.
   At this time suspension or cancellation of the Service Agreement may be considered.
- Early Connections Coffs Coast reserves the right to take legal action to recover outstanding fees. All services and supports from Early Connections – Coffs Coast may be cancelled or suspended if this policy is not adhered to.
- All accounts that are unpaid will be forwarded to the NDIS for further action.

# ADDITIONAL INFORMATION -

# **NDIS and the Coronavirus Emergency Response Plan**

The Australian Government has enacted the Coronavirus Emergency Response Plan and the NDIA is taking necessary steps to prepare and support participants and providers during the coronavirus (COVID-19) pandemic. The Agency is collaborating with the Department of Social Services, Services Australia and the NDIS Quality and Safeguards Commission as well as health agencies to deliver the NDIA's Pandemic Plan in line with the Government's Emergency Response Plan. Further information can be found at <a href="ndis.gov.au">ndis.gov.au</a>. The Agency has responded to the COVID19 pandemic through a number of temporary measures.

(https://www.health.gov.au/resources/publications/australian-health-sector-emergency-response-plan-for-novel-coronavirus-covid-19) It was in line with this Plan that the NDIA responded to COVID19 through implementing a price increase for selected supports and *changes to the existing cancellation rules* as self-isolation and quarantine measures are enforced.

Early Connections-Coffs Coast may implement pricing updates or changes to fees for cancellations as guided by the NDIS in response to coronavirus (COVID-19). NDIS has advised that sections of the new Price Guide related to COVID-19 apply until 30 September 2020, with a review before the end of June 2020. The definition of short notice cancellations is effective from 25 March 2020 and in accordance with latest NDIS guidelines.

# **DOCUMENTATION**

Documents related to this policy				
Related policies	-	Complaints Handling Policy and Procedure		
	-	Case Management – Service Plan Policy		
Forms, record keeping or other	-	Service Agreement signed by both parties		
organisational documents	-	Signed quote outlining agreed services and cost.		
		(Schedule of Supports)		
Reviewing and approving this policy				



Frequency	Person responsible	Approval
Annually	Manager and Management Committee	Management
		Committee

Policy review and version tracking					
Review	Date Approved	Approved by	Next Review Due		
1	April 2018	Management Committee	June 2019		
2	15 <sup>th</sup> July 2019	Management Committee	July 2020		
3	15.06.2020	Management Committee	June 2021		

# Management Committee:

Signed:

Name: Ian Braine Date: 15.06.2020