

POLICY C08 CLIENT FEES

Scope Home Access acknowledges the need for equity in client fee processes to ensure all client fees are calculated and applied in a fair and transparent manner. Scope Home Access will ensure that fees charged for social enterprise activities are fair and reasonable and meet any legislative requirements for fair trading. Scope Home Access also provides government funded and/or subsidised programs that are delivered in accordance with funding body guidelines. Fee determination processes will be based on the true costs to the organisation. These processes, with reference to funding caps determined by the relevant government funding bodies and with consideration to the availability of funding, resource and program limitations, will be implemented to support clients to access an appropriate service. Clients will be made aware of any fees or costs to them that may be associated with service provision, prior to commencement of services.

For the purpose of this Policy, the term client fees will be taken to include 'client contributions' where this definition/term is used under certain funded services for Aged Care (Commonwealth) and Disability (State and Territories).

1.0 CLIENT FEES POLICY

1.1 OBJECTIVE OF THIS POLICY

- To define what constitutes client fees within the context of both funded/subsidised services and unfunded, social enterprise service provision.
- To outline the responsibilities of the Board of Directors and senior staff members with respect to setting and reviewing fees and communicating fee changes to clients.
- To describe client responsibilities with respect to the payment for or contributions towards service provision including time-frames for payment.
- To outline the processes for invoicing and receipting payments where applicable and for notifying clients and managers of any arrears.
- To define hardship provision that may result in term-payment frameworks and/or fee reduction
- To outline the management of outstanding fees

2. POLICY

This policy relates to fees for services, materials and consumables provided. Services provided by Scope Home Access fall into three categories:

1. Aged Care – recipients eligible and entitled to subsidised services funded by the Commonwealth under the Commonwealth Home Support Programme (CHSP)
2. Disability – recipients eligible and entitled for subsidised services funded by the State or Territories under the Community Care Support Programme (CCSP)
3. Social Enterprise (SE) – our business stream of services to clients who are not eligible under category 1 or 2 including services provided under the National Disability Insurance Scheme (NDIS).

Fees or costs are commonly referred to in funded program guidelines as client contributions. For clients who are not eligible for services funded or subsidised by a third party, fees will be based on fair and reasonable market (commercial) rates. The market rate is reviewed and determined by the Board of Directors as required but not less than tri-annually.

3. DEFINITION OF FEES

Fees are a financial payment for part or all of the elements of service provision including co-ordination, project management, labour, materials and consumables, travel and administration which are not specifically itemised and/or provided for under subsidised funding programs.

- Funded or Subsidised Programs are programs or services for which Scope Home Access receives funding for all or part of the program costs from a third party e.g. block government funding, philanthropic trusts, sponsored programs or projects.
- Social Enterprise services are services for which Scope Home Access does not receive any funding for service costs from a third party (e.g. brokered or subcontracted services, services paid for directly by clients, other NFP service providers, clients in receipt of Homecare packages (as defined in legislation), commercial entities, government agencies and departments or NDIS participants from their allocated plan budgets). These services are invoiced at full market cost.
- The Scope Home Access Client Fees Matrix (Appendix C08a) is a schedule of fee prescribed by a government funding body and defines the way fees for funded service provision are calculated.
- Verified client circumstances refer to documents that may be required to be provided to Scope Home Access in order to support a client's claim for the level of fees to be charged or review of fees for hardship provision within a funded or subsidised program. These documents may include: pension card, statements of ongoing fees from other service providers, doctor or pharmaceutical statement of extensive and ongoing medical costs or a STATUTORY DECLARATION related to extensive costs relevant to a client's chronic or ongoing medical/disability issues.
- Standard Terms for payment of fees are 14 days from receipt of invoice.
- Standard Term Payment is a 3 month, interest-free term with instalments paid weekly or fortnightly.
- Extended Term Payment is a 6 month, interest-free term with instalments paid weekly or fortnightly.
- Hardship Provision Term Payment is a 12 month, interest-free term with instalments paid weekly or fortnightly where an application for Hardship Provision has been reviewed and approved by the Divisional Manager, Corporate Services and/or the CEO and/or where relevant, an Appeal Application to the Board of Directors.
- Any variation of the Standard Term Payment is at the discretion of the organisation and may be subject to a Hardship Provision Term Payment full application process.

4. FEES POLICY PRINCIPLES

Commonwealth funded Aged Care services - Scope Home Access adheres to the Client Contribution Principles defined through the Commonwealth Home Support Programme (CHSP) Principles Based Client Contribution Framework (October 2015) for Aged Care.

NSW State funded Disability services - Scope Home Access adheres to the NSW Family and Community Services (FACS-NSW), Ageing Disability and Homecare (ADHC) Community Care Supports Program (CCSP) Fees Policy revised June 2015.

Fees for these services are implemented across aged care and disability services as outlined in the Scope Home Access Client Fees Matrix (Appendix C08a). This information is included in the Scope Home Access Client Information booklet and on the organisational website – www.scopehomeaccess.com.au. The extent and limitations of funded or subsidised services (including funding caps) which are able to be provided by Scope Home Access under government programs, are described within the service type definitions contained in the government guidelines and/or program manuals referred to by the contractual Funding Agreements provided by government to Scope Home Access.

4.1 AGED CARE - CLIENT CONTRIBUTION PRINCIPLES – FUNDED UNDER THE COMMONWEALTH HOME SUPPORT PROGRAM (CHSP)

1. **Consistency:** All clients who can afford to contribute to the cost of their care should do so. Client contributions should not exceed the actual cost of service provision.
2. **Transparency:** Client contribution policies should include information in an accessible format and be publicly available, given to, and explained to, all new and existing clients.
3. **Hardship:** Individual policies should include arrangements for those who are unable to pay the requested contribution.
4. **Reporting:** Grant agreement obligations include a requirement for providers to report the dollar amount collected from client contributions.
5. **Fairness:** The Client Contribution Framework should take into account the client's capacity to pay and should not exceed the actual cost to deliver the services. In administering this, providers need to take into account partnered clients, clients in receipt of compensation payments and bundling of services.
6. **Sustainability:** Revenue from client contributions should be used to support ongoing service delivery and expand the services providers are currently funded to deliver.

4.2 DISABILITY – PRINCIPLES FOR THE SETTING OF FEES – FUNDED UNDER NSW COMMUNITY CARE SUPPORT PROGRAM (CCSP – NSW FACS – ADHC)

1. Evidenced inability to pay cannot be used as a basis for refusing a service to eligible people who are assessed as needing a service.
2. Providers should reduce or waive the fee when a person is assessed and evidenced as not having the capacity to pay the full fee.
3. Each person assessed as having capacity to pay should be charged fees in accordance with their level of income, the services they use and any changes in their circumstances.
4. Service providers are required to charge the full cost of the service where clients are receiving, or have received, compensation payments intended to cover the cost of support services.
5. People with high or multiple service needs should not be charged more than a maximum amount of fees in a given period irrespective of actual amounts of services used in line with program guidelines.

6. Fees charged should not exceed the actual cost of service provision.
7. Fees should not be charged for services such as information, advocacy and friendly visiting.
8. The fee charged for a service should be all-inclusive and cover all materials, labour and contracted labour/services used in delivery of the service.
9. Fee collection should be administered efficiently and the cost of administration should be less than the income received from fees.
10. For the purposes of these principles, solicited donations are equivalent to fees and are subject to the provision of these principles.

5. REVIEW OF FEE STRUCTURE

Client fees and service charges are reviewed annually in the 3rd quarter of each financial year to coincide with construction-related market forces and to allow for budget preparation and service planning in the following financial year, unless otherwise directed or determined by government funding bodies.

Social Enterprise (business) fees or clients who are not eligible for services funded or subsidised by a third party, will be based on the market (commercial) rate within a particular region of service, as reviewed and set by the Board of Directors from time to time as part of their Business Planning strategy. The market rate is reviewed and determined by the Board of Directors in consultation with the CEO and Senior Management Team, as required but not less than tri-annually.

6. CAPACITY TO PAY – HARDSHIP PROVISION

- Waiving or reduction of fees based on capacity to pay applies only to funded services.
- Clients who have difficulty paying fees are to discuss this in the first instance with the appropriate Regional Manager, Client Services. Payment schedules and plans can be negotiated based on individual circumstances defined in Clause 3 of this document.
- Fees may be subsidised or waived for funded programs, as defined by program guidelines attached to any Scope Home Access government funding contract or agreement. This will be negotiated in the first instance, between the Regional Manager, Client Services and the client and as such these agreements will be time limited.
- All clients and/or their nominated advocate must be advised of the appeal process, which is described in more detail below.

7. PAYMENT OF FEES

Clients will be informed of the fees associated with any service at the time of assessment or prior to construction/installation, as soon as a quote is calculated and available. Clients will be advised of any forthcoming variation to fees, which may affect them.

In charging fees for services the following principles will apply:

- payment of a fee for service will be sought from clients who are assessed, as having the capacity to pay.

- where a client has been assessed as not having the capacity to pay the set fee, a review process will take place as soon as possible as defined in point 9 of this policy.

8. COLLECTION OF FEES

- Once the level of fee to be charged has been set the client must be advised in writing or provided with a quote or service agreement, including the applicable fees to be charged.
- Where applicable to the service program, Occupational Therapists will generally collect the client's fee towards their Standard Assessment Service at the time of assessment and issue the client with a hard copy receipt. In some circumstances, the client may be invoiced post assessment.

For complex/major home modifications within funded programs, clients may be invoiced for their contribution to the ongoing progression of the application after Standard and Extended OT assessment (including Joint Home Visit builder consultation).

Deposits and/or progress payments may be invoiced, as per legislated contract requirements, for major installation/construction services. For all other services, an Invoice will be sent on completion of the work and quarterly statements where applicable.

Receipts are provided on request or when payments are made in cash or through EFTPOS facilities.

Clients will be able to pay their fees invoice by cheque, money order or EFTPOS facilities accessed by phoning Reception at each of the organisation's base office locations.

- Accounts personnel will keep a record of invoices and receipts received will be deposited in the Scope Home Access account at the banking facility nominated by the Board of Directors.
- Scope Home Access will undertake regular invoicing activities to ensure a client is in receipt of an invoice for service as soon as possible after the service has been provided. Quarterly Statements for multiple or outstanding invoices will also be provided to clients.
- The estate of a service participant may be charged for fees in arrears.
- Client fees will be identified as such in the accounts kept on the Scope Home Access accounting systems.
- Term Payment plan status reports will be provided to the Board of Directors at the first Board Meeting held after the end of financial year or more frequently as determined from time to time by the Board.

8.1 CHANGES IN CLIENT CIRCUMSTANCES

All clients who have been issued with an invoice or payment plan for services received are required to advise Scope Home Access within two weeks (14 days) of any change in their personal or financial circumstances which significantly alters their capacity to pay.

8.2 DEBT MANAGEMENT

Scope Home Access will take reasonable steps to prevent clients from accumulating debts including taking the necessary steps to recover the debt where a client has not:

- paid the invoiced or scheduled payments as agreed and has not responded to service provider communications to address same.
- contacted the provider to discuss a revised payment schedule or make other arrangements.

8.2.1 OUTSTANDING DEBTS

Before undertaking additional work for clients with outstanding debt, Scope Home Access will take reasonable steps to recover the debt.

- Government subsidised services should not be considered a free service to clients and a client who chooses not to pay or to negotiate repayment of outstanding debts may preclude access to additional service.
- A client owing money is entitled to be treated with respect and courtesy and must not be subject to misleading, humiliating or intimidating conduct or debt collection processes. Such conduct may breach consumer protection and other laws.
- Where all actions have been exhausted for recovery of an outstanding debt as identified in Point 8 of this Policy, the Board of Directors may direct the debt to be sent to an authorised collection agency. The client will be advised in writing of this action and the outstanding debt will be progressed through the collection agency.

9. APPEALS MECHANISM

Where an agreed fee level mechanism for term payment of fees and/or hardship provision can't be reached through negotiations with either Client Services or Accounts staff, clients will be advised that they may lodge a written appeal with the Board of Directors stating their reasons, with evidence, for further reduction or waiver of fees for a service they have received. The Regional Manager, Client Services will support the client to complete an appropriate application form which will be provided to the next Board Meeting for determination.

- any client or client advocate who appeals about the level or extent of fees charged or the outcomes of a negotiated term payment plan, will receive a written statement of the outcome of their appeal to the Board of Directors and advice of what steps they can take if they have a complaint about the policies or processes of Scope Home Access (See B02 Grievance Policy);
- a client will not be disadvantaged or penalised as a result of lodging an appeal about fees or negotiated payment plan with the Board of Directors, however the determination of the Board of Directors will be final.

10. VARIATION TO CLIENT FEE/CONTRIBUTION PAYMENTS

10.1 TERM PAYMENT VARIATIONS

Approval of the Standard Term Payment Plan **prior to work being carried out:**

- The Regional Manager, Client Services, has authority to negotiate a Standard or Extended Term Payment Plan (interest free) with a client.

Approval of term payments where work has already been carried out and where an agreement or contract was signed by a client or their nominated advocate prior to the work commencing:

- All term payment applications made after an agreement or contract has been signed and the work carried out, will be negotiated through the Divisional Manager, Corporate Services or their duly nominated Accounts Officer.
- The CEO or the Divisional Manager, Corporate Services may ask for documentation to verify and support any client claims for variation to a Term Payment Plan. If the negotiation remains unresolved, the matter will be referred to the next meeting of the Board of Directors who will make the final determination on such claims.

10.2 FINANCIAL ASSISTANCE

Scope Home Access can provide information on government sanctioned financial supports that may be available to the client but cannot recommend a course of action or any particular program or organisation for financial supports. Scope Home Access staff will not analyse nor determine the most appropriate financial support for the client's personal circumstances.

RELATED POLICY:

Policy B02	Grievance Policy
Policy B04	Access and Equity
Policy C01	Client Intake, Entry & Exit
Policy C03	Delivery of Services
Policy F01	Accounting Systems

RELATED PROCEDURES:

Administration Manual
Client Services Manual
Policy Appendix C08a – Client Fees Matrix
Policy Appendix C08b – Financial Assistance Information Sheet

RELEVANT LEGISLATION AND/OR GOVERNMENT POLICY:

Home Modification Fees Policy, NSW Community Care Supports Program (CCSP)
Version 2.0 Ageing, Disability and Home Care Department of Family and Community Services NSW
revised June 2015
Client Contribution Framework, Commonwealth Home Support Programme (CHSP), October 2015

POLICY APPROVAL BY BOARD OF DIRECTORS

BENETTA TAMBARIKIS / Deputy Chair Person	B. Tambarikis	27.6.2017
Print Name/Title	Signature	Date

