

# Early Learning Coalition



of Pinellas County, Inc.

<b>Policy:</b> ELCPC-60.2.1	Title: Sliding Fee and Parent Co-Payments for School Readiness	
<b>Review Date:</b> February 2018		<b>Next Review Date:</b>

## References:

F.S. 1002.84, F.S. 1002.87, F.S. 1002.88 and Rule 6M-4.400 Florida Administrative Code

## Background:

According to Section 1002.85(2)(c)5., F, S., the Coalition is required to adopt a sliding fee scale based on the federal poverty guidelines for serving children through the School Readiness program (SR). The Coalition's sliding fee scale requires a parent copayment to participate in the school readiness program. The Coalition may, on a case-by-case basis, waive the copayment for an at-risk child or temporarily waive the copayment for a child whose family's income is at or below the federal poverty level and experiences a natural disaster or an event that limits the parent's ability to pay, such as incarceration, placement in residential treatment, or becoming homeless, or an emergency situation such as a household fire or burglary, or while the parent is participating in parenting classes.

A parent may not transfer school readiness program services to another school readiness program provider until the parent has submitted documentation from the current school readiness program provider to the Coalition stating that the parent has satisfactorily fulfilled the copayment obligation. Providers are required to collect the parent's copayment.

## Policy:

**Sliding Fee Scale:** The Coalition is responsible for establishing the sliding fee scale and a parent co-payment policy based on the federal poverty guidelines for serving children through the School Readiness program. Each year, the Coalition will revise the sliding fee scale to reflect the adoption of the most recent federal poverty guidelines.

1. The Coalition's sliding fee scale will be set at a level that provides economically disadvantaged families equal access to the care available to families whose income is high enough not to qualify for school readiness services.
2. The Coalition will submit the proposed sliding fee scale approved by the Board to the Office of Early Learning (OEL) annually for approval.
3. The Coalition's revised sliding fee scale will be forwarded to the Family Services staff timely for implementation.
4. The effective date for the revised sliding fee scale will be July 1st of each fiscal year.

**Co-payment:** The Coalition staff will be assessing a co-payment for each family that receives school readiness services payment based on the family size, the hours of care needed, and the family's income as follows:

- If a child is authorized for part time care, the parent shall be assessed a part time co-payment.
- If a child is authorized for full time care, the parent shall be assessed a full time co-payment.
- A parent with two or more children receiving school readiness services may receive a co-payment discount of 25% or less for the second and any subsequent child in the care based on the Coalition's approved sliding fee scale. When the discount is applied, the youngest child must be assessed a full co-payment based on the approved sliding fee scale and the hours of care needed.
- When a child's normal schedule of care is based on the school year schedule and the child is authorized school readiness part time care during the school year and attends a full time day at the school readiness program on a school holiday or school closure, the parent shall pay the part time co-payment. During the summer break, if said child attends full time, the parent shall pay the full time co-payment.
- Co-payments for at-risk families as defined in Section 1002.81(1), F.S., shall be assessed at the initial child care authorization.
- A co-payment shall not be equal to or greater than the providers private pay rate.
- A family may submit documentation at any time during the eligibility authorization period to decrease the co-payment.

**Graduated Phase-out:** The Coalition shall re-evaluate the family's eligibility at the end of the initial 12-month eligibility period as follows:

1. At redetermination, if a family's income is above 150 percent of the Federal Poverty Level (FPL), but at or below 85 percent of the State Median Income (SMI), the family will enter the graduated phase-out. The parent shall be assessed a co-payment that is based on the approved sliding fee scale. As the family's income increases the co-payment shall gradually increase based on the approved sliding fee scale.
2. During graduated phase-out, SR childcare funding will be authorized for 12 months from the redetermination date. At redetermination the Coalition staff shall provide written notice to the family and provider of the required co-payment for the 12-month period to be paid by the parent to the provider. The notice shall inform the parent that the co-payment shall increase as the family's income increases.
3. During graduated phase-out, the family shall report any changes in the family size or income to the Coalition within ten (10) calendar days. The Coalition shall adjust the family's co-payment based on the reported information and shall notify the family and provider of any changes within ten (10) calendar days. The parent co-payment shall be increased or decreased based on any reported changes, as required, that affect the parent co-payment.
4. During graduated phase out, if the family's income exceeds 85% of the SMI, the family is no longer eligible for the program. The Coalition shall notify the family that the family is no longer eligible to receive SR services and the SR services will be discontinued two weeks (14 calendar days) from the date of the notice, as long as the two-week period does not extend beyond the family's authorized eligibility period.
5. During the graduated phase out, if the family's income falls below 150% of the FPL, the copayment shall be adjusted based on the approved Coalition's sliding fee scale and the family will remain in the graduated phase out and continue to receive services for the remainder of the twelve-month phase-out period as follows:

- At the end of the initial 12-month eligibility period at redetermination, if a family's income remains at or below 150 percent of the FPL, the family will remain eligible pursuant to Rule 6M-4.200, F.A.C.
- The family's eligibility, co-payment, and reporting requirements are subject to the requirements of the initial eligibility period and will not be subject to the graduated phase-out criteria.
- At the end of the initial 12-month eligibility period at redetermination, if a family's income exceeds 85% of the SMI, or the family is otherwise no longer eligible, the Coalition shall notify the family that the family is no longer eligible to receive school readiness services and school readiness services will be discontinued.

The payment certificate issued by the Coalition includes the co-payment to be paid by the parent to the SR provider. The Coalition must notify the parent that additional fees which are charged by the provider may apply. If a child is enrolled with more than one provider, a co-payment must be assessed for each authorized provider. The co-payment amount for which the family is responsible shall be subtracted from the provider's reimbursement, prior to payment to the provider by the Coalition.

**Provider Responsibility:** In accordance with Section 1002.84(8), F.S., collection of the family's required co-payment for school readiness services shall be the responsibility of the SR provider.

- The provider shall provide written notice of the co-payment due date.
- The parent co-payment shall be collected within ten (10) calendar days of the provider's payment due date.
- The provider must give the parent a receipt for each co-payment made by the parent and retain receipt records for all child care co-payments.
- The provider shall document outstanding parent co-payment balances. The provider shall provide written notification to the parent of the current outstanding co-payment balance within fifteen (15) calendar days of the provider's payment due date. This notification shall be provided at least on a monthly basis as long as there is a co-payment balance. Outstanding parent copayments will be subject to the provider's payment policies as acknowledged and agreed upon by the parent.
- The provider shall document the parent's acknowledgement of receipt of payment policies related to the school readiness program prior to the parent enrolling his/her child in the provider's school readiness program.
- If the provider intends to take action, in accordance with its policy, against a school readiness parent for non-payment of the co-payment that includes disenrolling the child from the provider site, the provider shall notify the coalition at least five (5) calendar days prior to disenrollment.

**Co-payment waivers:** In accordance with Section 1002.84(8), F.S., the Coalition may waive the parent co-payment on a case-by-case basis. Requests for the co-payment waivers shall be documented in the case file during the initial authorization for care and at each redetermination.

- At-risk co-payment waivers; the co-payment may be waived on a case-by-case basis for families participating in an at-risk program as defined in Section 1002.81(1), F.S.
- Temporary co-payment waivers; the co-payment may be temporarily waived on a case-by-case basis for families with income at or below 100 percent of the federal poverty level during an event that limits a parent's ability to pay as defined by Section 1002.84(8), F.S.
- Transfers; parent may not transfer his or her child to another school readiness program provider until the parent has submitted documentation from the current school readiness

program provider to the Coalition stating that the parent has satisfactorily fulfilled the co-payment obligation related to school readiness program. Satisfactory fulfillment of the co-payment obligation is defined as immediate payment of the outstanding co-payment obligation or establishment of a repayment plan for the outstanding co-payment obligation. All transfers shall be approved by the Coalition.

If the referenced documentation is not available, the Coalition staff shall contact the provider to determine compliance and document compliance as reported by the provider. The Coalition staff shall complete the transfer once the copayment obligation has been satisfactorily fulfilled.

If a parent of an at-risk child as defined in Section 1002.81(1), F.S., is unable to satisfactorily fulfill the co-payment obligation prior to transfer, the provider shall attempt to arrange a repayment plan with the at-risk child's parent. If the provider is unable to arrange a payment plan with the at-risk child's parent, the provider shall document the repayment attempt and submit documentation to the Coalition.

**Co-payment changes:** the parent co-payment shall not be increased during the initial 12-month eligibility authorization period. The amount of co-payment assessed shall be in effect for the family's authorized eligibility period, unless:

- The parent or referring agency requests and the Coalition grants a waiver of the assessed co-payment
- An incorrect co-payment was assessed by the Coalition staff as a result of an error of the eligibility determiner, program participant error, or program participant fraud, resulting in corrective action to reduce or increase the family's co-payment
- An employment status, income or family size results in a lower parent copayment, or
- The authorized hours of care changes
- Co-payments during graduated phase out may be increased or decreased based on the family's income and size

**Coalition co-payment errors:** The Coalition shall not take action to recover an incorrect co-payment made due to an error of the staff. Once the error is discovered, the Coalition must correct the error and apply the corrected co-payment. The Coalition staff shall notify the parent within ten (10) calendar days of changes to the co-payment. This notification must be documented.

**Co-payment recovery:** In cases when a reimbursement overpayment is caused by an incorrect co-payment assessment which resulted from parent error or parent fraud, the Coalition shall attempt to recover the overpayment and document attempts. If the coalition is unsuccessful in recovery of the overpayment, the Coalition shall notify the Office of Early Learning and submit documentation as necessary in accordance with the Coalition's approved anti-fraud plan.

**Attachments:**

- Sliding Fee Schedule
- Co-Payment Waiver for At - Risk Clients Request Form
- Temporary Copayment Waiver Request Form