

Department of Children and Youth Affairs
26/10/2017

Dear Service Provider

I am writing as a follow up to the letter from Stephen Brophy (DCYA) issued in September of 2016 in relation to attendance and registration and my letter is also prompted by recent roadshows held by the Department where we heard feedback around the challenges in identifying what constitutes adequate attendance records.

Given the sizable increase in subvention levels paid from public monies this September, it is ever more incumbent on us to ensure that the monies allocated are used for their intended purpose. That is to support families in accessing quality, affordable childcare, which first and foremost provides a positive, supportive caring and learning environment for the child, and also supports families in getting back into employment or education.

It is critically important that we (the Department, through Pobal) can verify that this is the case and stand over what this Department views as critical investment in a critical area. We must be able to verify that children are receiving the childcare according to the subvention claimed from the providers. To do this, we ask Pobal and its compliance team to engage with providers and verify from records that this childcare has occurred within the structures of the programme as set out in the “Rules” document.

Two key challenges have arisen in this regard across a sufficiently high number of providers to be of considerable concern:

1. Inadequate record keeping by providers
2. Disconnects between PIP registrations and attendance

The DCYA has a responsibility to actively and urgently address the matter.

The September 16 letter noted the following:

“Actual attendance patterns and service provision levels should be based on verifiable documents, for example detailed roll books, fee records enrolment forms, agreements signed by parents/guardians etc”

Where it is found that the records are wholly insufficient to establish attendance, DCYA through Pobal reserve the right to identify an overclaim based on the minimum applicable subvention rate or, if they are non-existent, to withdraw the service from the programme.

Services are requested to undertake a review their record keeping practice and ensure they are compliant with the service requirements. *In brief, records must include the following:*

- *Child’s full name as outlined on PIP registration details.*
- *Date of attendance*
- *Time of child’s arrival*
- *Time of child’s departure*

The following guidance is also provided to inform good record keeping and efficient review by compliance officers.

- Where manual records are maintained, the child’s records should be on the same line each day/week/month in order to identify patterns of attendance.

- Where electronic records are maintained, the service must be able to produce weekly/monthly reports for individual children which show their level of attendance for the cycle to date. It is recommended that these reports are regularly produced and made available for compliance purposes.
- It is important that attendance records are maintained for separate rooms/sessions, so that it can be established if staff/child ratios, FTE caps etc. are being met.
- Where a service collects children from a school for an afterschool service, services should record attendance from the time the children are under their responsibility.
- Staff members who facilitate each session should also sign the attendance book, with a view to establishing that appropriate staff ratios are being met.

With regard to discrepancies between PIP registrations and attendance, these must be addressed by the provider in line with rules of the relevant scheme. A particular challenge arises where a child is registered for a particular level of attendance in the “snapshot” period under CCS and this attendance never manifests or only exists for a very short period. This is clearly unacceptable.

It is extremely important that providers engage with parents to verify their individual needs and this must define the level of registration on PIP. If the level of registration does not or has not matched the actual level of attendance, the registration may be amended by DCYA/Pobal to reflect actual attendance levels from the date of registration. DCYA/Pobal reserve the right to apply an overclaim to correct the financial error where inaccurate registrations have been applied.

To ensure clarity about the actual requirements, DCYA has amended the recent rule set to the following:

2.2.5 Entering a child on the CCS Programme

The service manager must confirm the number of days the child is being enrolled for and the type of childcare when registering the child for a CCS place. Further instructions on Child Registration are available in the How to Guide

2.2.5 Entering a child on the CCS Programme

The service manager must confirm and agree with the parent the number of days and pattern (i.e. number of hours per day) for which the child will actually attend. The registration type will be defined according to the agreed attendance pattern. Further instructions on Child Registration are available in the How to Guide

This paragraph will be added to all chapters of the rules (excluding the “pattern” reference which does not apply to ECCE).

The concerns outlined in this letter do not in any way increase the requirements on services; the general obligations remain constant. I am very aware of the concerns with regard to the administrative burden on childcare services (and all other bodies in any sector) by the receipt of public monies. It is hoped that the non-contact time payments recently announced by the Minister will go some way to alleviating this pressure.

In addition, we as a Department review on an ongoing basis all of our processes to see where we can minimise the administrative overhead without compromising our responsibility with regard to the effective and verifiable use of public monies.

I would also take this opportunity to thank you for your work and the vital service you provide to families and your community.

Yours faithfully

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