



EARLY LEARNING COALITION OF BREVARD COUNTY, INC.



MINUTES: Board of Directors Meeting
DATE/TIME: Tuesday, March 20, 2018 at 3:00 p.m.
LOCATION: Early Learning Coalition of Brevard, Conference Room 1018 Florida Ave, Rockledge, FL
MEMBERS PRESENT: Terri Barlow, Alan Bergman, Mark Broms, Victoria Candelora, Lori Duester, Priscilla DeNino, Ian Golden, Linda Halpin, Jeffrey Harrison, Don Lusk, Beth Mills, Myrna Shimei, Gina Tiedeman and Travia Williams
EXCUSED ABSENT MEMBERS: Natalie Jackson and Althea Puzio
UNEXCUSED ABSENT MEMBERS:
STAFF PRESENT: Sky Beard, Jessica Beecham, Cathie Odom, Tina Snyder and Gina Sousa
GUEST PRESENT: N/A
CALLED TO ORDER: Alan Bergman called the meeting to order and quorum was established 3:07 p.m. Pledge of allegiance took place and introductions were conducted.

AGENDA ITEM	SUMMARY/DISCUSSION	ACTION/FOLLOW-UP
Consent Items	<ul style="list-style-type: none"> a. Minutes: February 20, 2018 b. Directors Report c. OEL Accountability Report (moved to an agenda item) 	<p>Don Lusk inquired about the standard process established to review the OEL Accountability Report. Ian Golden motioned to move the OEL Accountability Report to an agenda item to be discussed later in the meeting. Gena Tiedeman seconded the motion. The motion passed unanimously by all Board members.</p> <p>Myrna Shimei motioned for the remaining Consent Items to be approved. Lori Duester seconded the motion. The motion passed unanimously by all Board members.</p>
Committee Reports	<p>Executive/Finance Committee: Alan Bergman reported to the Board that the Executive/Finance Committee met on Monday, March 9, 2018. The agenda items included:</p> <ul style="list-style-type: none"> • Approval of February 12, 2018 Minutes • Legislative Update – to be discussed later in meeting • Budget to Actuals Follow Up 	No Action/Follow-up
New Business	<p>Presentation: Brevard Public Schools Discipline Policy (Dr. Patricia Fontan and Melissa Catechis): Sky Beard introduced Dr. Patricia Fontan and Melissa Catechis to the Board members. Patricia and Melissa presented the Board with the following handouts (see attached):</p> <ul style="list-style-type: none"> • Discipline Plan Elementary PreK – 6th Grades Student Behaviors and Range of Corrective Strategies • Definitions of Corrective Strategies • Definitions of Student Behaviors • Discipline Plan Power Point <p>The Board reviewed the components of the PreK-6th Grade Discipline Plan (see attached). At this time, the plan has not been implemented, but if approved, training will be rolled out to Brevard Public Schools by July 2018 for the SY 18.19.</p>	No Action/ Follow-up

	<p>Sky suggested that input from private VPK providers may offer additional insight and would provide greater consistency between VPK and kindergarten. There will be a meeting scheduled for the BSP team and private providers to meet and discuss the plan.</p> <p><u>OEL Accountability Report:</u> Ian Golden requested this agenda item be moved to the April Board meeting due to the weather threat. Gena Tiedeman requested that a brief summary of the corrective action items be provided to the Board prior to the April meeting.</p>	
Old Business	<p><u>Finance Report and Waiting List/New Enrollment Update:</u> Cathie Odom reviewed the Earmarks thru February. Currently there are 698 children on the wait list and Coalition staff are calling 120 families per month. Last month 60 families were contacted and 48 families enrolled in services. The families that were added to the list in July and August 2017 are currently being called off.</p> <p><u>Legislative Update:</u> The Board reviewed a Power Point that contained legislative updates (see attached); due to the weather threat, only the highlights were reviewed. The Board discussed the upcoming requirements that will be needed if the proposed bills are passed.</p>	No Action/Follow-up
Public Comment/Board Announcements	Priscilla DeNino announced to the Board that she has sold The Learning Tree and due to this change she would no longer be able to be the Private Provider Representative. Sky informed the Board that the Coalition will be sending out the voting information to the providers for a new Private Provider Representative.	No Action/Follow-up
Adjournment	The meeting was adjourned at 5:02 pm	<p>Ian Golden motioned for the adjournment of the Board meeting.</p> <p>Priscilla DeNino seconded the motion. The motion passed unanimously by all Board members.</p>
Next Meeting	April 17, 2018	No Action/Follow up

March 2018 Board of Directors Minutes Approved:

Respectfully Submitted,

Approved

Signature Date
Executive Coordinator

Signature Date
Executive Director



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Board of Directors Meeting Tuesday, March 20, 2018

- I. Call to Order
- II. Pledge of Allegiance
- III. Coalition Roll Call by Self Introduction
- IV. Consent Items
 - a. Minutes: February 20, 2018
 - b. Director's Report
 - c. OEL Accountability Report
- V. Committee Reports
 - a. Executive/Finance Committee
- VI. New Business
 - a. Presentation: Brevard Public Schools Discipline Policy
(Dr. Patricia Fontan and Melissa Catechis)
- VII. Old Business
 - a. Finance Report and Waiting List/New Enrollment Update
 - b. Legislative Update
- VIII. Public Comment
- IX. Adjourn

Next Meeting: April 17, 2018

LAUNCHING A CHILD'S FUTURE!



EARLY LEARNING COALITION **OF BREVARD COUNTY, INC.**



MINUTES: Board of Directors Meeting
DATE/TIME: Tuesday, February 20, 2018 at 3:00 p.m.
LOCATION: Early Learning Coalition of Brevard, Conference Room 1018 Florida Ave, Rockledge, FL
MEMBERS PRESENT: Terri Barlow, Alan Bergman, Mark Broms, Victoria Candelora, Priscilla DeNino, Ian Golden (sub: Stephanie Bryant), Jeffrey Harrison, Natalie Jackson, Don Lusk, Linda Halpin, Althea Puzio, Myrna Shimei, Gina Tiedeman and Travia Williams
EXCUSED ABSENT MEMBERS: Lori Duester, Beth Mills
UNEXCUSED ABSENT MEMBERS:
STAFF PRESENT: Sky Beard, Jessica Beecham, Cathie Odom, Tina Snyder, Jennifer Shields and Gina Sousa
GUEST PRESENT: N/A
CALLED TO ORDER: Alan Bergman called the meeting to order and quorum was established 3:03 p.m. Pledge of allegiance took place and introductions were conducted.

AGENDA ITEM	SUMMARY/DISCUSSION	ACTION/FOLLOW-UP
Consent Items	a. Minutes: January 16, 2017 b. Directors Report	Priscilla DeNino motioned for the Consent Items to be approved. Althea Puzio seconded the motion. The motion passed unanimously by all Board members.
Committee Reports	<p>Executive/Finance Committee: Alan Bergman reported to the Board that the Executive/Finance Committee met on Monday, February 9, 2018. The agenda items included:</p> <ul style="list-style-type: none"> Florida First Start Funding update – FFS and Coalition staff mutually agreed that the current fiscal year would be the last year the grant would be funded. FFS staff is actively enrolling/transferring families into the other home-visiting programs. Draft Audit Report – the Committee reviewed the audit report and the requested changes/corrections that were sent to the auditors that will be completed before the final draft is reviewed at full Board meeting. The Committee motioned to recommended to send the draft audit to the full Board for approval. The draft audit will be sent to the full Board for review and questions are to be sent to Cathie. Budget to Actuals – The Committee reviewed the Budgets to Actuals through December 31, 2017. The Committee requested that there be a report to look at the amount of change that will happen when the currently filled staff positions are added in. Legislative Update – to be discussed later in meeting. 	No Action/Follow-up

Old Business	<p><u>Finance Report and Waiting List/New Enrollment Update:</u> Cathie Odom informed the Board that the Earmarks were not ready to be reported to the Board.</p> <p>Enrollments are up; however, the report does not reflect the true enrollments number because four providers were late submitting their attendance sheets.</p> <p>The wait list numbers are down, with 759 children, 686 under school age and 103 school age. Currently Coalition staff are calling about sixty families a month off the wait list. Families that were added to the list in March 2017 are being contacted.</p> <p>Match is currently projected at a deficit but the numbers for January have not been approved by OEL. Coalition staff continues attempts to identify and secure local match opportunities.</p> <p><u>Legislative Update:</u> The Board reviewed and discussed the currently monitored Legislative budgets and bills that relate to the Coalition's work (see attached). Items discussed included the federal and state budgets as well as proviso match language. A variety of early learning related bills were also discussed.</p>	
New Business	<p><u>Audit Presentation:</u> Sky Beard introduced Octavio A. Verdeja and Manny Alvarez with Verdeja, De Armas & Trujillo CPAs. Octavio and Manny introduces themselves and then presented the Board with the FY 2016.17 Early Learning Coalition of Brevard County, Inc. Financial Statements Supplementary Information and Independent Auditors' Report (see attached). No concerns were noted in the report. The copy presented to the Board in hard copy was not the most currently updated and correct copy of the report. However, the copy previously emailed to the Board was the most current.</p> <p>The Board approved the previously sent copy of the Early Learning Coalition of Brevard County, Inc. Financial Statements Supplementary Information and Independent Auditors' Report.</p>	<p>Mark Broms motioned to approved the previously emailed copy of the Early Learning Coalition of Brevard County, Inc. Financial Statements Supplementary Information and Independent Auditors' Report June 30, 2017 and 2016. Althea Puzio seconded the motion. The motion passed unanimously by all Board members.</p>
Public Comment/Board Announcements	<p>Priscilla DeNino informed the Board that the Brevard Public Schools Kindergarten registration is coming up. Posters were distributed to the Board members and Coalition staff.</p> <p>Sky Beard introduced a new Board member, Henry Perez. He then gave the Board information regarding himself, his family and his interested in the work the Coalition does. Mr. Perez sits on Board of Space Coast Early Intervention and will have to abstain from voting on matters that may relate to the provider.</p>	No Action/Follow-up
Adjournment	The meeting was adjourned at 4:46 p:m	<p>Jeffrey Harrison motioned for the adjournment of the Board meeting. Natalie Jackson seconded the motion. The motion passed unanimously by all Board members.</p>
Next Meeting	March 20, 2018	No Action/Follow up


February 2018 Board of Directors Minutes Approved:

Respectfully Submitted,

 3/20/2018

Signature Date
Executive Coordinator

Approved

 3/20/2018

Signature Date
Executive Director



Director's Report March 2018

State and Office of Early Learning (OEL) Update:

- Sky Beard will be attending the Association of Early Learning Coalition's meeting on Friday, March 15, 2018 in Jacksonville. As Chair of the statewide Association (AELC), Sky will be conversing with other Coalition Executive Directors about the impact of this legislative session, planning for next session, sharing best practices and addressing other topics in need of collaborative discussion.

Coalition Update:

- The Early Learning Coalition has submitted its application to United Way for the next round of funding allocated from the Community Care Fund. The Coalition will participate in a site visit and presentation in April and funding allocations will be made after that time. All dollars awarded from United Way are used as local match and provide School Readiness services to children in Brevard.
- ELC hosted its Spring Provider Meeting on Friday, March 9 in Viera. A morning and afternoon session were offered and updates were provided on legislative issues, VPK readiness rates, School Readiness and VPK contracting processes, upcoming Provider Portal functionality and inclusion service reminders. In addition, Linda Halpin, DCF Child Care Licensing Supervisor, also attended and shared updates and reminders related to DCF regulations.
- The Coalition will be hosting its 9th Annual Provider Conference on Saturday, April 14 at the Crowne Plaza Melbourne – Oceanfront. The early learning conference will provide high quality workshop presenters as well as opportunities for teachers, directors and other early childhood professionals to engage with one another.
- Members of the Coalition's Leadership Team will be attending the Association of Early Learning Coalition's Leadership Symposium on April 25 – 27 in Orlando. The annual training conference includes workshop opportunities, keynote presenters and panel discussions centered on all aspects of Coalition operations and service delivery. The event is unique as it is attended by Coalition staff from around the state and focused solely on ELC related topics.



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SPECIALIST**
FRED TRIPLETT

REPORT AS17-18.01
FEBRUARY 2018



FLORIDA DEPARTMENT OF
EDUCATION
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OFFICE OF
Early Learning

LEARN EARLY. LEARN FOR LIFE.

***ACCOUNTABILITY MONITORING REPORT FOR THE
EARLY LEARNING COALITION OF BREVARD COUNTY***

The Florida Department of Education's Office of Early Learning (OEL) conducted an early education and care accountability review for the Early Learning Coalition of Brevard (the Brevard Coalition, the coalition). The coalition is incorporated as a not-for-profit organization, which is tax exempt under 26 USC s. 501(c)(3).

All early learning service providers who expend state and federal funds shall operate early education and care programs in a manner that complies with state and federal rules, regulations and laws. The team conducted the review to ensure the coalition's overall administration and implementation of early learning programs (Coalition Governance (CG), Operations and Program Management (OPM), Child Care Resource and Referral (CCR&R), Educational Services Delivery (ESD), School Readiness (SR), Voluntary Prekindergarten (VPK), and Data Accuracy (DA)) meets or exceeds service delivery and operational requirements.

The combination desk and onsite review began Monday, Oct. 16, 2017. The accountability review team reviewed the coalition's programmatic operations from July 1, 2016, through Oct. 31, 2017; the coalition's monitoring reports and supporting documentation for SR services the coalition delivered April, May, June and July 2017; and for VPK services during the 2016-2017 and 2017-2018 program years.

The Early Learning Grant Agreement requires the coalition to take corrective actions for each non-compliance finding. The report notes corrective action recommendations to help the coalition effectively deliver program services.

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I. Authority

Federal and Florida laws, rules and regulations mandate that OEL administer early learning programs in Florida, as well as monitor and evaluate each coalition's performance in administering the early learning programs and implementing the coalition's SR plan (Title 45, Code of Federal Regulations (CFR); ss. 98.1(b)(6), 1002.82(2)(p) and 1002.75, Florida Statutes (F.S.)). The monitoring and performance evaluations must include, at a minimum, onsite monitoring of a coalition's finances, management, operations and programs. OEL may also identify business practice observations for a coalition's consideration to improve the outcomes of the early learning programs. Observations can include items noted that increase the entity's risk of potential non-compliance and, if left unresolved, could generate findings in future program years.

II. Scope and Methodology

OEL developed performance criteria to provide a framework for measuring a coalition's effectiveness in implementing early learning programs. The performance criteria include indicators about compliance with federal and state laws, rules and regulations to assist the coalition in maintaining high quality in coalition governance (CG), operations and program management (OPM), Child Care Resource and Referral (CCR&R), educational services delivery (ESD), SR eligibility, VPK child eligibility (VPKC), VPK provider eligibility (VPKP), SR payment validation (SRPV), VPK payment validation (VPKPV) and data accuracy (DA).

OEL will review all coalitions in the 2017-2018 review cycle for CG, OPM, CCR&R, ESD, DA, SR, VPK child and VPK provider eligibility. OEL will base these reviews on a risk assessment conducted prior to the beginning of each monitoring cycle to establish projected monitoring sample sizes.

III. Coalition Background Information

Provider type and children served – The following is a list of the number of provider types and the number of children served by program type. The number of children served includes eligible children birth through school age.

Type of Providers	Number of SR Providers	Number of VPK Providers	Number of School Readiness Children	Number of Voluntary Prekindergarten Children
Faith-Based Providers ¹	N/A	43	N/A	1,392
Family Child Care Homes	5	1	50	10
Private Centers/Schools	104	140	4,137	3,755
Public School Providers	0	38	0	955
Informal Caregivers	0	N/A	0	N/A
Total (unduplicated) ²	109	179	4,169	4,679

Source – OEL Fact Book FY2017-2018 (as of Dec. 26, 2017).

¹ Distinct count of providers. The provider type counts include faith-based providers, which OEL does not consider a separate provider type. OEL does not require that a coalition identify faith-based providers in the SR Program.

² The sum of coalition data does not equal the statewide total. More than one coalition may serve these children.

Organization and staffing – The coalition has a staff of 47 full-time employees who implement the programmatic aspects of the coalition’s board of directors’ mission.

Board governance – The coalition’s board of directors serves as the coalition’s policy-making entity and delegates authority to the coalition’s executive director. At the time of the review, the board consisted of 16 members representing Brevard County. Membership composition includes representatives from both the private and public sectors. The standing committees, established according to the coalition’s bylaws that support the board are the Executive/ Finance, Strategic Planning, and Nominating.

Scope of services –

During the review period, the coalition and the School Board of Brevard County, Florida provided the following early learning services –

SR child eligibility determinations	<input checked="" type="checkbox"/> Coalition	<input type="checkbox"/> Contractor
VPK child eligibility determinations	<input checked="" type="checkbox"/> Coalition	<input type="checkbox"/> Contractor
VPK provider eligibility determinations	<input checked="" type="checkbox"/> Coalition	<input type="checkbox"/> Contractor
SR provider reimbursements	<input checked="" type="checkbox"/> Coalition	<input type="checkbox"/> Contractor
VPK provider reimbursements	<input checked="" type="checkbox"/> Coalition	<input type="checkbox"/> Contractor
CCR&R	<input checked="" type="checkbox"/> Coalition	<input type="checkbox"/> Contractor
Parent support	<input checked="" type="checkbox"/> Coalition	<input checked="" type="checkbox"/> Contractor
Health screening	<input checked="" type="checkbox"/> Coalition	<input type="checkbox"/> Contractor
Developmental screening	<input checked="" type="checkbox"/> Coalition	<input type="checkbox"/> Contractor
SR provider recruitment	<input checked="" type="checkbox"/> Coalition	<input type="checkbox"/> Contractor
VPK provider recruitment	<input checked="" type="checkbox"/> Coalition	<input type="checkbox"/> Contractor
SR provider training	<input checked="" type="checkbox"/> Coalition	<input type="checkbox"/> Contractor
VPK provider training	<input checked="" type="checkbox"/> Coalition	<input type="checkbox"/> Contractor
EFS management	<input checked="" type="checkbox"/> Coalition	<input type="checkbox"/> Contractor
Information Systems Security	<input checked="" type="checkbox"/> Coalition	<input type="checkbox"/> Contractor

The coalition’s allocations for the SR and VPK programs in the fiscal year ending June 30, 2018, totaled approximately \$29,980,097.00. Expenditures³ totaled approximately \$14,511,960.00.

Early Learning Coalition of Brevard County Reported SR and VPK Allocations and Expenditures		
Services	Allocation FY 2017-2018	Expenditures (as of Dec. 21, 2017; Dec. 20, 2017; Dec. 20, 2017)
School Readiness	\$18,246,147.00	\$8,630,674.00
CCEP	\$126,134.00	\$30,612.00
Total SR	\$18,372,281.00	\$8,661,286.00
Voluntary Prekindergarten	\$11,137,479.00	\$5,690,952.00
Administration	\$445,499.00	\$141,961.00
Total VPK	\$11,582,978.00	\$5,832,913.00
Outreach, Awareness and Monitoring Initiative		
Outreach and Awareness	\$10,165.00	\$3,318.00
Monitoring	\$14,673.00	\$14,443.00
Total OAM	\$24,838.00	\$17,761.00

³ Expenditures in the table represent cost categories that support the scope of the accountability review and are not all-inclusive.

Total All Programs	\$29,980,097.00	\$14,511,960.00

Source – SR Notice of Award July 1, 2017; VPK Notice of Award July 1, 2017; OAMI Notice of Award July 1, 2017; and OEL Expenditure Worksheet

IV. Review Criteria Findings and Recommendations

The following report summarizes the entity's compliance or noncompliance to early learning requirements that the accountability review analysts observed during the monitoring engagement. Under the terms of the Early Learning Grant Agreement between OEL and the coalition, the coalition must submit a corrective action plan for all noncompliance findings within 30 days of receiving the published report. Each finding(s) and its associated recommendation in this section has a reference number. The numbered statements contain the review observations on criteria that did not comply with state or federal requirements. Some files may contain more than one finding(s) type. The file numbers cited in each finding(s) refer to the file(s) listed on the monitoring review spreadsheets or scorecards. **The recommendations address steps the coalition should take to correct the observed noncompliance. A corrective action plan should identify the initial finding's cause and how the coalition will correct the finding(s) and continue compliance.**

V. Coalition Governance

For SR, VPK and CCR&R program success, a coalition must have an effective executive leadership structure. The board should be the policymaking entity for the coalition, and the executive director should have the primary responsibility for implementing and managing the coalition's policies.

Each coalition establishes its own bylaws, including selecting a method of parliamentary procedures to provide structure and organization for board business and operations. The Brevard Coalition's bylaws set Modern Rules of Order as a standard for parliamentary procedure for voting members. A coalition's approach to governance is important to avoid possible legal challenges to board actions.

In addition, in order to allow public input and provide timely information, the coalition board must comply with Florida Sunshine Law. Compliance includes noticing meetings and holding them at times and in places accessible to the public, as well as promptly recording meeting minutes and making them available to the public.

CG-A. Board Governance

OEL reviewed policies and procedures, observed processes, inspected documents and, where necessary, interviewed entity personnel to determine the coalition board's effectiveness and statutory adherence. A coalition's approach to governance is important to avoid possible legal challenges to board actions.

- 1. The coalition adheres to board membership statutory and program requirements.** (*s. 286.011, 1002.83(2)-(11), Florida Statutes (F.S.); Rule 6M-9.110, Florida Administrative Code (FAC); Article I, Section 24, Florida Constitution*)

The coalition met all requirements for this criterion.

- 2. The full board and committee meeting process includes decision-making by quorum.** (*s. 1002.83(6), F.S.*)

The coalition met all requirements for this criterion.

- 3. Each board member with a disclosed conflict of interest abstains from voting as statute requires.** (*ss. 112.3143 and 1002.83(8), F.S.; Grant Agreement, Exhibit IV. B, H and J*)

The coalition met all requirements for this criterion.

4. **Each board member discloses the nature of his or her interests as a public record in a memorandum and the board incorporated the disclosure in the minutes as statute requires.** (*ss. 112.3143 and 1002.83(8), F.S.; Grant Agreement, Exhibit IV. B, H and J*)

The coalition met all requirements for this criterion.

CG-B. Board Meeting Accessibility and Sunshine Law

OEL reviewed policies and procedures, observed processes, inspected documents and, where necessary, interviewed entity personnel to determine whether the board adheres to Florida Government in the Sunshine. This allows public input and provides timely information.

1. **The coalition noticed and conducted board and committee meetings and workgroups according to Florida Sunshine Law, including notification requirements and written meeting minutes.** (*s. 286.011(1),(2) and (6), F.S.; 2014 Government in the Sunshine Manual; s. 1002.85(2)(a), F.S.; Rule 6M-9.110, FAC*)

The coalition met all requirements for this criterion.

CG-C. Previous Corrective Actions

OEL examined previous findings and coalition follow-up actions to determine whether the coalition is in compliance with the corrective action plan OEL accepted following the coalition's most recent CG accountability review.

1. **CG corrective action plan adherence.** (*Grant Agreement, Exhibit III, section B*)

The coalition met all requirements for this criterion. The coalition implemented previously-accepted corrective actions.

VI. Operations and Program Management

OEL reviews the coalition's OPM performance for a clearly defined organizational structure, including procedures to effectively manage coalition personnel; adherence to customer complaint resolution processes; maintaining internal controls over federal programs, consistent with laws, rules and policies; processes to accurately and promptly report improper payments; and policies and procedures to monitor all subrecipient and child care provider contracts' administrative, programmatic and eligibility aspects.

OPM-A. Operations, Human Resources and Internal Controls

OEL reviewed policies and procedures, observed processes, inspected documents and, where necessary, interviewed entity personnel to determine whether the coalition or its contractors followed state and federal statutes and Early Learning Grant Agreement requirements regarding background screenings, subrecipient and child care provider monitoring, and human resource policies.

1. **The coalition and its contractors have implemented background screening procedures as the Grant Agreement and applicable laws require.** (*ss. 435.04, 943.052 and 1002.84(9), F.S.; Grant Agreement, Exhibit I, section E*)

Finding(s) –

- **Item 1** – While the coalition obtained documentation of completed background screenings from the subrecipient on Dec. 5, 2017, the coalition did not verify that the subrecipient's staff cleared the screening before contract execution and maintain the screenings on file as the Grant Agreement requires.
- **Item 2** – The coalition's background screening procedures do not contain the requirement –

Any subrecipient, contractor or subcontractor who does not meet the definition of "Qualified Entity," but who will perform duties under contract with the ELC and who is permitted access to a child care location while

children are present, or who will have access to confidential information about the children in care of their family, shall comply with all of the above.

The coalition completed the following corrective action(s) –

Item 1 – The coalition stated it will have subrecipient staff clear the background screening process before executing the subrecipient’s contract and it will maintain the results on file.

Recommendation(s) –

OPM-A.1, Item 2 – Revise the coalition’s background screening procedures to include the missing element. Submit policy to OEL.

- 2. The coalition certified that it complies with the requirements for VPK and SR records, including records access and confidentiality and retention, as OEL approved in the coalition’s SR Plan. (Grant Agreement, Exhibit I, sections FF and GG; ss. 119.07(1), 1002.72 and 1002.97, F.S.; and Article I, Section 24, Florida Constitution)**

The coalition met all requirements for this criterion.

- 3. The coalition has appropriate separation of duties to prevent personnel performing duties relating to parent/child application intake and eligibility determination and approval from performing duties relating to accounting and reimbursement, unless the coalition has implemented sufficient internal controls for proper reimbursement processes/procedures oversight. (45 CFR Part 75; Grant Agreement, Exhibit IV, section B.13, Certifications and Assurances)**

The coalition met all requirements for this criterion.

OPM-B. Improper Payments

OEL reviewed policies and procedures, observed processes, inspected documents and, where necessary, interviewed entity personnel to determine how the coalition discovers and reports improper payments.

- 1. The coalition followed the anti-fraud due process procedures as rule requires. (Rule 6M-9.400, FAC; CCDF State Plan 8.1.5; Grant Agreement, Exhibit II, sections D.3 and R)**

Finding(s) –

- **Item 1** – The coalition did not provide 1 of 5 clients sampled written advance notice a minimum of 14 calendar days before suspending or terminating services as Rule 6M-9.400, FAC, requires.
- **Item 2** – The coalition’s written advance notice to clients did not contain the following elements that Rule 6M-9.400, FAC, requires –
 - The coalition includes the, “Notice of the potential for repayment of improper benefits if the conclusion of fraud is upheld.” However, it does not include the clarifying phrase, “including any benefits received after the receipt of the written advance notice.”
 - The procedure for the recipient to obtain a copy of his or her file.
 - The amount of overpayment due for recovery, if applicable.

The coalition completed the following corrective action(s) –

Item 2 – The coalition updated its written advance notice including all missing elements.

Recommendation(s) –

OPM-B.1, Item 1 – Submit to OEL the coalition’s fraud notification process and evidence of staff training on the process.

OPM-C. Subrecipient and Child Care Provider Monitoring

OEL reviewed policies and procedures, observed processes, inspected documents and, where necessary, interviewed entity personnel to determine whether the coalition has an adequate provider oversight and monitoring resolution process.

1. **The coalition conducts subrecipient monitoring for all contracted early learning programs according to its approved monitoring plan.** (ss. 1002.84(14)-(15) and 1002.85(2)(h), F.S.; and Grant Agreement, Exhibit I, sections C and J; Exhibit II, section D.6; Exhibit IV, section II.F)

The coalition met all requirements for this criterion.

2. **The coalition monitors SR child care providers in compliance with its plan and Rule 6M-4.630, FAC, to verify that providers are implementing effective programs as ss. 1002.82, 1002.84 and 1002.88, F.S., require.** (45 CFR s. 74.51; s. 1002.82, F.S.; CCDF State Plan 1.3.2; Rule 6M-4.630, FAC; Grant Agreement, Exhibit II, section D.6)

Finding(s) –

While the coalition submitted documentation to support tier 1 monitoring during the 2016-2017 program year, the OEL was unable to verify whether the ELC monitored all contracted providers for required elements in tier 1 as rule requires. It appeared the coalition monitored based on a sample of providers and not all of them.

Recommendation(s) –

OPM-C.2 – Submit to OEL documentation that shows the coalition utilized a tier 1 log that meets the requirement of Rule 6M-4.630, FAC.

3. **The coalition has a monitoring process and tool for onsite VPK child care provider monitoring based on the VPK Outreach, Awareness and Monitoring Initiative (OAMI) Grant requirements.** (VPK OAMI Grant; Grant Agreement, Exhibit II, section D.6; OEL-VPK 20)

The coalition met all requirements for this criterion.

OPM-D. Previous Corrective Actions

OEL examined previous findings and coalition follow-up actions to determine whether the coalition is in compliance with the corrective action plan OEL accepted following the coalition's most recent OPM accountability review.

1. **OPM corrective action plan adherence.** (Grant Agreement, Exhibits II and III)

The coalition met all requirements for this criterion.

VII. Child Care Resource and Referral

CCR&R serves as the front door to all services the coalition or its contracted service provider offer. Rule 6M-9.300, Florida Administrative Code (FAC), requires a coalition to offer a parent assistance with locating child care and information – which will help the parent make an informed decision – as well as additional information and community resources as appropriate.

A coalition shall follow the minimum standards required to guide the coalition in delivering CCR&R services to a family. CCR&R requirements address issues such as customer service criteria, staff training and certification, consumer services and information, and database maintenance. Each CCR&R specialist should be able to explain various types of legally operating early learning and school-age child care providers (including all licensed and license-exempt centers; faith-based providers; licensed, registered and large family child care homes; school-age care providers; SR providers; VPK providers; Head Start providers; Early Head Start providers; nanny/au-pair

agencies; and summer camp providers). When offering CCR&R services, a coalition must provide a family with options and resources in addition to wait list placement. A family enrolling a child in the VPK Program may request a complete list of all area VPK providers or receive a customized list of area VPK providers that best matches the family's needs. The Child Care and Development Fund (CCDF) plan states that all Florida families should have access to CCR&R services. CCR&R services support families in becoming self-sufficient and making informed decisions about child care.

CCR&R-A. CCR&R Services Delivery

OEL reviewed policies and procedures, observed processes, inspected documents, conducted Quality Assurance Assessment (QAA) calls and, where necessary, interviewed entity personnel to determine whether the coalition makes CCR&R services available and accessible to all Florida families.

1. **The coalition adheres to QAA requirements for CCR&R services.** (*s. 1002.92, F.S.; Grant Agreement, Exhibit II, sections B.4 and C.4; Rule 6M-9.300, FAC*)

The coalition met all requirements for this criterion.

2. **The coalition provides CCR&R services without cost to the individual requesting services within three business days of the individual's request for services.** (*Rule 6M-9.300(3)(d), FAC; Grant Agreement, Exhibit II, section C.4.12*)

The coalition met all requirements for this criterion.

3. **The coalition maintains a website and one other form of outreach and awareness within its service area that describes the services offered and the website clearly displays administrative and CCR&R contact information, including phone numbers and hours of operation on the front page of the website.** (*Rule 6M-9.300(4)(b), FAC; Grant Agreement, Exhibit II, section C.1.12*)

The coalition met all requirements for this criterion.

4. **The coalition submitted to the OEL the CCR&R Accessibility Report and CCR&R ELC Staff List prior to the last business day in August.** (*Rule 6M-9.300(4) FAC; Grant Agreement, Exhibit II, sections C.4.13 and D.7.11*)

The coalition met all requirements for this criterion.

CCR&R-B. Customized Child Care/Child Care Listings

OEL reviewed policies and procedures, observed processes, inspected documents, conducted QAA calls and, where necessary, interviewed entity personnel to determine whether the coalition provides a complete informational packet to each individual requesting CCR&R services.

1. **The coalition provides a child care listing to each individual requesting service within three business days after the individual requested services.** (*s. 1002.92(3)(a)-(b), F.S.; Grant Agreement, Exhibit II, section C.4.12; Rule 6M-9.300(6), FAC*)

Finding(s) –

The child care listing for QAA Call No. 2 had fewer than 10 providers. Rule requires the coalition to provide at least 10 providers unless fewer than 10 match the search criteria.

OEL requires no further corrective action(s) –

The coalition submitted evidence of staff training conducted on the required elements of a CCR&R listing.

CCR&R-C. Consumer Education/Community Resources

OEL reviewed policies and procedures, observed processes, inspected documents, conducted QAA calls and, where necessary, interviewed entity personnel to determine if the coalition offers a list of relevant consumer education resources and community resources, including the manner in which customers can obtain each resource, to all individuals requesting CCR&R services.

1. **The coalition adheres to consumer education and community resources requirements outlined in rule. (s. 1002.92(1) and (3)(h), F.S.; Rule 6M-9.300(7), FAC; CCDF State Plan 2.2.3; Grant Agreement, Exhibit II, C.4.4 and 11)**

Finding(s) –

For QAA call No. 2, the coalition did not provide contact information for the state and local child care provider licensing agencies as rule requires.

OEL requires no further corrective action(s) –

The coalition submitted evidence of staff training conducted required elements of a CCR&R listing.

CCR&R-D. Provider Information

OEL reviewed policies and procedures, observed processes, inspected documents and, where necessary, interviewed entity personnel to determine whether the coalition complied with rule and statute regarding updating provider information in EFS.

1. **The coalition completed the provider update process within the required timeframe. (Rule 6M-9.300(8), FAC; Grant Agreement, Exhibit II, C.4.3 and 4.4)**

The coalition met all requirements for this criterion.

CCR&R-E. Previous Corrective Actions

OEL examined previous findings and coalition follow-up actions to determine whether the coalition is in compliance with the corrective action plan OEL accepted following the coalition's most recent CCR&R accountability review.

1. **CCR&R corrective action plan adherence. (Grant Agreement, Exhibit II, C.4)**

This criterion is not applicable. The coalition completed all required corrective actions.

VIII. Educational Services Delivery

During the review, the team looked at the required components for implementing a local comprehensive program of school readiness program services that complies with statutes and OEL-adopted rules that enhance children's cognitive, social and physical development to achieve performance standards. The components include verifying provider use of developmentally appropriate curricula, implementing developmental screenings and assessments for children participating in the program, coordinating staff development and provider training, improving child care quality and availability, and fostering parental support and involvement.

ESD-A. Age-Appropriate Developmental Screenings

OEL reviewed policies and procedures, observed processes, inspected documents and, where necessary, interviewed entity personnel to determine whether the coalition requires providers to implement an OEL-approved curriculum and a character development program.

1. **The coalition documented efforts to have all sampled children developmentally screened within 45 days of enrollment and the coalition's screening policies align with Rule 6M-4.720, FAC. (s. 1002.84(5), F.S.; Rule 6M-4.720(2)(b)-(c), FAC; Grant Agreement, Exhibit II, 6.5.1 and 6.5.3)**

The coalition met all requirements for this criterion.

- 2. The coalition has a process to verify that parents receive the screening results in writing.** (*s. 1002.84(5), F.S.; Rule 6M-4.720(2)(b)-(c), FAC; Grant Agreement, Exhibit II, 6.5.1*)

The coalition met all requirements for this criterion.

- 3. The coalition has a process to verify that a parent who has declined screening on a child's behalf has submitted a completed Form OEL-SR 24 to the coalition or provider, or has documented on a coalition form that he or she is declining child screenings.** (*Rule 6M-4.720(2)(d), FAC*)

The coalition met all requirements for this criterion.

- 4. The coalition initiated individualized supports within 60 calendar days for children showing concerning screening results, as Rule 6M-4.720(5), FAC, describes.** (*Rule 6M-4.720(5), FAC; Grant Agreement, Exhibit II, 6.5.2*)

The coalition met all requirements for this criterion.

- 5. The coalition has a process to verify that each parent of a child who receives a referral receives notification of the referral in writing and the coalition's procedure aligns with Rule 6M-4.720(5), FAC.** (*Rule 6M-4.720(5), FAC*)

The coalition met all requirements for this criterion.

ESD-B. Previous Corrective Actions

OEL examined previous findings and coalition follow-up actions to determine whether the coalition is in compliance with the corrective action plan OEL accepted following the coalition's most recent ESD accountability review.

- 1. ESD corrective action plan adherence.** (*Grant Agreement, Exhibit II, D.6 and F.8*)

This criterion is not applicable. The coalition had no previous corrective actions.

IX. School Readiness Eligibility

OEL reviewed SR eligibility applications, referrals, redeterminations, hours of care, rights and responsibilities/terms and conditions, parental choice, immunization, child's age, definition of a parent, residency, citizenship/immigration status, family unit size and income, parent copayment, purpose for care, billing group eligibility, qualifying care and provider arrangements, and EFS information accuracy.

During the 2016-17 fiscal year, the coalition served 5,247 children in the SR program. Using the established risk assessment methodology, the review team examined 27 SR child files for compliance with the SR Program under Title 45 CFR, parts 98 and 99; CCDF plan Part 2; s. 1002.87, F.S.; and Rule 6M-4, FAC. The sample represents 0.5 percent of the total SR children the coalition served. Six of the reviewed files contained one or more findings.

SR-A. Eligibility Application Process

An SR child file must include a completed application and child care (payment) certificate that the parent has signed and dated. A parent must sign an application at the initial eligibility determination and at each subsequent redetermination. A parent may submit an application via mail, facsimile or electronically.

The child care (payment) certificate is an authorization for services for eligible child(ren) at eligible providers. The certificate identifies the child(ren) for whom a coalition authorized child care, the provider the family selected, the assessed parent copayment for each eligible child(ren) and the authorized begin and end dates.

1. **The coalition has a completed, signed and dated application for each child.** (45 CFR s. 98.20(b); ss. 1002.84(7) and 1002.89(6)(c), F.S.; Rule 6M-4.208 (3), FAC; CCDF State Plan 2.1.2)

The coalition met all requirements for this criterion.

2. **The coalition has a completed, signed and dated payment certificate for each child.** (45 CFR s. 98.2; s. 1002.82(6)(c), F.S.; Rule 6M-4.200(4), FAC; CCDF State Plan 4.1)

The coalition met all requirements for this criterion.

SR-B. Child Care Authorization Forms (Referrals)

Several child care eligibility categories for SR services require a documented Child Care Authorization form as the OEL Standard Codes note. For all partner referral programs, a coalition shall have a documented Child Care Authorization Form and approve child care for the period the Child Care Authorization Form authorizes if the authorized period is within program guidelines and the child meets SR Program requirements.

This section only applies to families receiving child protection services, families participating in the Welfare Transition Program (WTP) and families receiving services from a designated homelessness program or a certified domestic violence program. It may also apply to children in the Relative Caregiver (RCG) Program if there is a Child Care Authorization Form.

1. **The coalition has a complete and valid Child Care Authorization Form for each applicable child.** (45 CFR s. 98.20(b); Grant Agreement, Exhibit II, C.6.1.5; Rule 6M-4.200(2), FAC)

Finding(s) –

- **File Nos. 6, 7, 10** – The travel time listed on the referral is incorrect.
- **File No. 15** –
 - The child care authorization form does not include the authorized hours of care.
 - The file does not document that the coalition contacted the referring entity to verify the authorized hours of care.
 - The most recently executed referral does not list the hours of care.

OEL requires no further corrective action(s) –

The coalition corrected the following file(s) – #6, 7, 10, 15

2. **The authorized eligibility period on the Child Care Authorization Form is the correct length.** (Rule 6M-4.200(2), FAC; CCDF State Plan 3)

The coalition met all requirements for this criterion.

3. **The coalition authorized SR services within the authorized child care period on the Child Care Authorization Form.** (Rule 6M-4.200(2), FAC)

The coalition met all requirements for this criterion.

SR-C. Timely Delivery of Services for Priority Groups

A coalition's eligibility determination/processing shall be timely and act upon a Child Care Authorization within 10 calendar days from receiving the Child Care Authorization (referral) form for TANF/TCA/TCC and at-risk programs.

This section only applies to families receiving child protection services, families participating in WTP, a designated homelessness program or a certified domestic violence program. It may also apply to children in the RCG Program if there is a Child Care Authorization Form.

- 1. The coalition acted upon the Child Care Authorization Form for each applicable client within 10 calendar days from receipt.** (*s. 1002.87(1), F.S.; CCDF State Plan 3.1.8; Grant Agreement, Exhibit II, C.6.1.3*)

The coalition met all requirements for this criterion.

SR-D. Authorized Hours of Care

Authorized hours of care for all SR services shall meet unit of care definition. The amount of care is related to purpose for care plus reasonable travel time (one hour per day). The definition of **full-time** care is at least six hours but not more than 11 hours of child care or early childhood education services in a 24-hour period. Although full-time employment or training will most often require authorization for full-time care, there are situations in which families will need only part-time care (such as for a child who is in school and only needs before- or after-school care). The definition of **part-time** care is fewer than six hours of care or early childhood education services in a 24-hour period.

- 1. The coalition authorized the appropriate hours of care based upon the amount of care the family needed.** (*ss. 1002.81(10) and (13), F.S.; Rule 6M-4.200(2) and (3), FAC; 45 CFR 98.21(g); CCDF State Plan 3.1.3*)

The coalition met all requirements for this criterion.

SR-E. Eligibility Period and Redetermination

A coalition must provide SR services to a family within the eligibility period. Eligibility begins only after a coalition has established all eligibility factors. At a minimum, a coalition must redetermine eligibility annually for every family who receives SR services. Welfare Transition Program participants will receive authorization for child care funding for the period the referring agency's child care authorization states. A coalition must discontinue a family's funding at the redetermination due date if the coalition has not yet fully reestablished the family's eligibility according to eligibility requirements. A coalition must document why a child is no longer eligible for the SR Program according to OEL's standard codes.

- 1. The client received SR services within the correct authorized eligibility period.** (*s. 1002.84(7), F.S.; Rules 6M-4.200(2)(a)-(b) and 4.208(4), FAC; CCDF State Plan 3.1.7*)

The coalition met all requirements for this criterion.

SR-F. Parental Rights and Responsibilities/Terms and Conditions

An SR child file must have a signed and dated Parental Rights and Responsibilities/Terms and Conditions notice that includes the required minimum information as criterion SR-V.4 in the SR Standard Eligibility Review Program Guide lists. The parent must sign the document at least annually or when content on the form changes.

- 1. There is evidence that the coalition notified parents of their rights and responsibilities.** (*45 CFR s. 98.30-34, 46 and 60; Rule 6M-4.200*)

The coalition met all requirements for this criterion.

SR-G. Parental Choice

A coalition must allow parents to choose from a variety of child care categories, including center-based care, family child care and informal child care to the extent authorized in the state's CCDF Plan that the United States

Department of Health and Human Services approved pursuant to 45 CFR s. 98.30. A coalition may not limit or exclude a faith-based provider's care and curriculum in any of these categories.

A coalition must retain documentation showing that it explained and offered parental choice. A coalition shall provide each applicant information that allows for informed parental choice decisions related to selecting a child care provider.

- 1. There is evidence that the parent received information about parental choice.** (45 CFR s. 98.30; s. 1002.82(2)(b), F.S.; CCDF State Plan 4.1)

The coalition met all requirements for this criterion.

SR-H. Health and Safety Requirements (including immunization)

Section 1002.88(1)(c) and (j), F.S., requires program providers to provide basic health and safety of their premises and facilities and comply with requirements for age-appropriate immunizations of children enrolled in the School Readiness Program.

All School Readiness providers must address basic health and safety of their program(s) and facilities, and shall allow the Department of Children and Families or local licensing agency, whichever is applicable, the ability to inspect all program premises, including access to facilities, personnel and records and to monitor and verify compliance with School Readiness health, safety and training standards, pursuant to ss. 402.311(2) and 1002.82(2)(i), F.S. Verification of immunization is conducted during these inspections.

Prior to participation in the School Readiness Program, and annually thereafter, each School Readiness Program facility shall receive a compliance inspection based on the requirements of s. 1002.88, F.S., and minimum standards contained within the provider-type specific health and safety checklist and corresponding handbook adopted under Rule 6M-4.620, FAC. Annual inspections shall be unannounced and shall take place within the contract year at a time the department or local licensing agency (as applicable) schedules.

The Department of Children and Families or local licensing agency (as applicable) will identify any issue of noncompliance with the standards outlined in the provider-type specific health and safety checklist(s) or corresponding handbook(s) and forward it to the appropriate early learning coalition for corrective action, probation or termination according to enforcement procedures outlined in the corresponding provider-type specific handbook and the Statewide Provider Contract for the School Readiness Program adopted under Rule 6M-4.610, FAC.

- 1. Each sampled School Readiness Program facility received a health and safety inspection according to s. 1002.88(1)(c), F.S., and Rule 6M-4.620, FAC, requirements.** (ss. 1002.88(1)(c) and 1002.88(1)(j), F.S.; Rule 6M-4.620, FAC)

The coalition met all requirements for this criterion.

SR-I. Child Age Requirements

State regulations require a child to be younger than 13 years to be eligible for the SR Program. However, revised Rule 6M-4.200(3)(b)1, FAC, effective Dec. 18, 2016, states that if a child's age exceeds the age limit during the 12-month authorization period, the child shall continue to receive services for the remainder of the 12-month authorization period.

- 1. Each child is younger than 13 years.** (45 CFR 98.20; s. 1002.87, F.S.; CCDF State Plan 3.1.1 and 3.1.7)

The coalition met all requirements for this criterion.

SR-J. Definition of a Parent

Federal regulation provides the definition of a parent for the purpose of establishing a child's eligibility for SR services. A parent means a parent by blood, marriage or adoption and also means a legal guardian or a person standing in loco parentis. In loco parentis is a person who acts in place of a parent, assuming care and custody of a child by a formal or informal agreement with the child's parent. Florida law states that a parent is either or both parents of a child, any guardian of a child, any person in a parental relationship to a child or any person exercising supervisory or temporary authority over a child in place of the parent.

1. **Each applicant met the definition of a parent.** (45 CFR s. 98.2; ss. 1000.21(5) and 1002.97(1), F.S.; Rule 6M-4.200(1)(b) and (c), FAC; CCDF State Plan 3.1.2 and 3.1.7)

The coalition met all requirements for this criterion.

SR-K. Residency Requirements

SR child files must include documented evidence that the family currently resides in the state of Florida. A coalition shall verify residency information with documentation that includes an in-state physical address. There is no minimum prerequisite length of time a person must reside in Florida to obtain benefits. A family member may also be a temporary resident in a domestic violence or homeless shelter in Florida or authorized emergency management location. A client must be a Florida resident to receive TANF benefits, which the referring agency verifies during the TANF/TCA application process (s. 414.095(2)(a), F.S.).

1. **The coalition established that each applicant is a Florida resident.** (45 CFR s. 98.20(2) and (3)(i); Rule 6M-4.208(4)(c), FAC; Grant Agreement, Exhibit II, C.6.1.5.5)

The coalition met all requirements for this criterion.

2. **The coalition authorized child care by parent's county of residence.** (ss. 1002.83(1) and 1002.89(5), F.S.; Rule 6M-4.208(4)(c), FAC)

The coalition met all requirements for this criterion.

SR-L. U.S. Citizenship/Qualified Alien Status

A child must be a U.S. citizen or a qualified alien to be eligible for SR services. For children born outside of the U.S., there must be documentation in the SR child file to support the child's legal status.

A coalition shall accept a Child Care Authorization Form (referral) from Workforce for TANF/TCA recipients as citizenship proof.

1. **The coalition established and documented each child's U.S. citizenship or qualified alien status.** (Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA); 62 Federal Register (FR) 61344; CCDF-ACF-PI-2008-01; CCDF State Plan 3.1.7; Grant Agreement, Exhibit II, C.6.1.5.6)

The coalition met all requirements for this criterion.

SR-M. Family Unit Income

An SR child file shall include a completed SR Income Worksheet for Eligibility and Parent Copayment to determine a child's eligibility and establish the applicable parent fee based on the sliding fee scale included in an OEL-approved coalition plan. When the parents (legal or biological), married or unmarried, reside together in the home, a coalition must include any income both parents receive in the total family income. OEL rules provide guidelines for verifying employment and income.

1. **Each file contains appropriate documentation that the SR participant acknowledged and affirmed the income and calculations the coalition used to assess the parent copayment for each applicant.** (*Rule 6M-4.200(3) and 6M-4.208(4)(g), FAC; CCDF State Plan 3.1.4, 3.1.5 and 3.1.7*)

The coalition met all requirements for this criterion.

2. **Each file contains appropriate documentation to fully support gross earned and unearned family income.** (*Rule 6M-4.200(3) and 208(4)(f)(6), FAC; CCDF State Plan 3.1.4, 3.1.5 and 3.1.7*)

The coalition met all requirements for this criterion.

3. **The coalition correctly calculated gross earned and unearned family income.** (*s. 1002.81(8), F.S.; Rule 6M-4.208, FAC; CCDF State Plan 3.1.4, 3.1.5 and 3.1.7*)

Finding(s) –

File No. 25 – OEL was unable to duplicate the coalition’s child support calculation. The coalition did not follow its process for calculating income.

Recommendation(s) –

SR-M.3 – Conduct staff training on calculating unearned family income. Submit evidence of training to OEL.

SR-N. Family Unit Size

Use family unit size along with the family’s gross annual income to determine if the family meets the income threshold to initially qualify for SR services. A family may consist of a parent or parents living together, a parent’s minor child and any other minor child for whom the parent is legally responsible. A family may also include any other adult whom the parent considers part of the family, such as a grandparent the family supports. Statute defines family or household members as “spouses, former spouses, persons related by blood or marriage, persons who are parents of a child in common regardless of whether they have been married and other persons who are currently residing together in the same dwelling unit as if a family” (*s. 1002.81(9), F.S.*).

1. **The coalition accurately determined family unit size and relationship.** (*s. 1002.81(9), F.S.; Rule 6M-4.208,(4)(e), FAC; CCDF State Plan 3.1.7*)

The coalition met all requirements for this criterion.

SR-O. Maximum Family Unit Income Threshold

In order for the coalition to approve a family for a service, the family applying must meet income eligibility requirements to receive approval unless the service is available without regard to income. OEL rules provide guidelines for verifying employment and income. An applicant must fully declare household circumstances and income on the application.

1. **Family unit size and income meet the income threshold requirement.** (*45 CFR s. 98.20(a)(2); s. 1002.87(1)(c) and (f), F.S.; Rule(s) 6M-4.200 and 4.208, FAC; CCDF State Plan 3.1.5 and 3.3.1*)

The coalition met all requirements for this criterion.

SR-P. Parent Copayment

For each parent who receives SR services, the coalition shall assess a copayment based on family size and the family’s gross annual income according to the sliding fee scale included in the OEL-approved coalition plan.

1. **The coalition correctly assessed the parent copayment.** (*45 CFR s. 98.42(a) and (b); s. 1002.84(8), F.S.; Rule 6M-4.400, FAC; CCDF State Plan 3.4*)

The coalition met all requirements for this criterion.

SR-Q. Parent Copayment Fee Waiver

A coalition may, on a case-by-case basis, waive the copayment for an at-risk child regardless of the family's income. Under the standard process for waiving a copayment for an at-risk child, the referring case manager may indicate the waiver on the referral or provide other written documentation requesting the fee waiver. In addition, a coalition may, on a case-by-case basis, waive the copayment for a child in a family whose income does not exceed the FPL and whose family experiences a natural disaster or an event that limits the parent's ability to pay (e.g., incarceration, residential treatment, homelessness, an emergency situation or the parent's participation in a parenting class).

1. **If applicable, the coalition documented the temporary fee waiver request and identified the reason.** (45 CFR ss. 98.42(c) and 98.20(a)(3)(ii)(A); s. 1002.84(8), F.S.; Rule 6M-400(6), FAC; CCDF State Plan 3.4.4)

The coalition met all requirements for this criterion.

SR-R. Purpose for Care

A family's eligibility for SR services depends on an established purpose for care. A coalition must verify that any parent who requests funding has a purpose for care.

1. **Each family has a documented and valid purpose for care.** (45 CFR s. 98.20(a)(3)(i) and (ii); Rule 6M-4.208(4)(f), FAC; CCDF State Plan 3.1.3 and 3.1.7)

The coalition met all requirements for this criterion.

2. **The coalition followed the correct procedure when families lost their purpose for care.** (45 CFR s. 98.20(a)(3)(i) and (ii); Rule 6M-4.200, FAC; CCDF State Plan 3.1.3 and 3.1.7)

The coalition met all requirements for this criterion.

SR-S. Billing Group Eligibility

Each family unit shall meet state requirements for the approved eligibility and billing group. Each OCA standard code provides definitions for each billing group's purpose for care. The same codes also act as guidance when a coalition should use the income of the "child only" to calculate eligibility. OEL has established standard codes (OEL Standard Codes) to categorize specific eligibility groups that are critical to the ability of OEL and its stakeholders to properly report on federal programs. Additionally, federal law requires a parent to have a purpose for care to receive funding. OEL standardizes codes for uniform and accurate data reporting on local, state and federal reports. A coalition's incorrect use of codes affects the accuracy of reporting, payments and reimbursements.

1. **The billing group is correct, based on SR Program requirements.** (45 CFR s. 98.20; Rule 6M-4.200, FAC)

The coalition met all requirements for this criterion.

SR-T. Qualifying Care and Provider Arrangements

To receive SR funds for providing child care services, a provider must be eligible to legally provide child care services and must have a fully executed SR provider agreement with the coalition. A parent may choose from a variety of eligible child care types, including licensed, licensed exempt, registered or informal care. Upon the effective date of the 2016 revisions to Rule 6M-4.620, FAC, the Department of Children and Families or the local licensing agency, as applicable, will conduct inspections to determine compliance with the School Readiness Program provider standards through exercise of its discretionary power to enforce compliance with the laws. The

authority to inspect includes access to facilities, personnel and records. A School Readiness Program provider that refuses entry or inspection shall have its provider contract terminated. The revised rule will require that school readiness providers must employ child care personnel who have satisfied the screening requirements of Chapter 402, F.S., and fulfilled OEL's training requirements.

1. **Only legally operating providers who met regulatory requirements provided SR services.** (45 CFR ss. 98.2 and 98.41; s. 1002.88(1)(a), F.S.; CCDF State Plan 3.1.1)

The coalition met all requirements for this criterion.

2. **The coalition had a fully executed Statewide Provider Contract for the School Readiness Program in place with each provider prior to making any payments.** (s. 1002.88(1)(e) and (p), F.S.; Rule 6M-4.610, FAC)

The coalition met all requirements for this criterion.

3. **The coalition enrolled children from licensed, out-of-home foster care in provider sites according to rule.** (Rule 65C-13.030(2)(d), FAC; CCDF State Plan 1.4.1 and 3.1.3(c))

Finding(s) –

The coalition did not follow the provider selection process for one birth to school-aged foster care child as rule requires.

OEL requires no further corrective action(s) –

The coalition submitted a process requiring the coalition to place all foster care children from birth to school age into care in accordance with the provider selection process and evidence of training conducted on the procedure.

SR-U. Statewide Information System Accuracy

The Grant Agreement requires a coalition to use the most current release of the OEL statewide information system, currently the Enhanced Field System or the Family Portal. A coalition must use the OEL statewide information system to establish eligibility for child care funding. The OEL statewide information system must accurately reflect the most current household circumstances that the applicant presented to the coalition. The OEL statewide information system is the basis for reimbursement and federal and state reporting.

The review shall consist of comparing SR child eligibility files against OEL statewide information system records for accuracy of entry, timeliness of processing actions, case history note narrations and data security.

1. **The information in each SR child file matched the information in the OEL statewide information system.** (s. 1002.82(2)(n), F.S.; Grant Agreement, Exhibit II, C.3 and C.6.1.5)

Finding(s) –

- **DA-A.1, File No. 6** – The coalition entered the parent's name into EFS as the child's name.

Note: OEL identified this finding with its data accuracy review. However, due to the nature of the noncompliance OEL is listing it in this section.

- **File No. 19** – The child's social security number in EFS does not match the one listed on the referral and DCF-Florida screen shot.

OEL requires no further corrective action(s) –

The coalition corrected the following file(s) – #6 (DA-A.1), 19

SR-V. Eligibility Policies, Priorities and Disenrollment

Each early learning coalition shall base priority for participation in the SR Program on s. 1002.87, F.S. In order to participate in the School Readiness Program, parents shall submit a prequalifying questionnaire, file an application if appropriate and provide requested documentation to an early learning coalition. If funds are available at the time of application, the coalition shall conduct an eligibility determination. If funds are not available at the time of application, the coalition shall place the child or children on a wait list.

Coalitions shall review each submitted application and required documentation within 20 calendar days of receipt to determine if the parent is potentially eligible based on s. 1002.87(1), F.S. The coalition shall notify the parent if the applicant(s) meet the wait list eligibility criteria. At least once every six months from the date the coalition initially placed the family on the wait list, or from the last revalidation date, the coalition shall contact the parent and request that the parent submit updated information regarding eligibility status. If the coalition determines that the family is potentially eligible based on the application, and if funding is available, the coalition shall conduct an eligibility determination based on s. 1002.87, F.S., and Rule 6M-4.200, FAC.

Disenrollment means the removal, either temporary or permanent, of a child from participation in the SR Program. A coalition may remove a child from the SR Program in compliance with Rule 6M-4.200(6), FAC.

- 1. The coalition's wait list procedures and practices follow rule and the Grant Agreement for serving children in the SR Program.** (s. 1002.87(1) and (3), F.S.; Rule 6M-4.300, FAC; Grant Agreement, Exhibit II, C.1 and 2; CCDF State Plan 3.2)

Finding(s) –

- **Item 1** – The coalition has one child on its last 15 children enrolled list with an application status of active waiting although the coalition enrolled the child in OEL Statewide Information System.
- **Item 2** – The coalition has one child on its last 15 children enrolled list that the coalition did not enroll in OEL Statewide Information System. The child has a status of active waiting.
- **Item 3** – The coalition has 11 children on the wait list with selected priorities not based on child age.

OEL requires no further corrective action(s) –

- **Item 1** – The coalition changed the child status on Nov. 9, 2017, from active waiting to active eligible.
- **Item 2** – The coalition updated the child's status in the statewide information system.
- **Item 3** – The coalition provided clarification, screenshots and corrected the children's priorities where applicable.

- 2. The coalition has certified that it is following its approved disenrollment policy for disenrolling children from SR services.** (s. 1002.87(7), F.S.; OEL-PG-240.04; Grant Agreement, Exhibit I, Y.6, and Exhibit II, C.6.3)

The coalition met all requirements for this criterion.

- 3. The coalition's written SR policies and procedures align with rules and statutes.** (ss. 1002.81 and 1002.87, F.S.; Rule 6M-4, FAC)

The coalition met all requirements for this criterion.

- 4. The Rights and Responsibilities/Terms and Conditions notification contains the required minimum information.**

The coalition met all requirements for this criterion.

SR-W. Previous Corrective Actions

OEL examined previous findings and coalition follow-up actions to determine whether the coalition is in compliance with the corrective action plan OEL accepted following the coalition's most recent SR accountability review.

1. SR corrective action plan adherence. *(Grant Agreement, Exhibit II, D.6 and F.8)*

This criterion is not applicable. The coalition completed all required corrective actions.

SR-X. School Readiness Subcontractor Monitoring

The Grant Agreement, Exhibit II, D.6, requires a coalition to have and implement an annual monitoring plan documenting the coalition's planned monitoring procedures for all contracts, grants, agreements and programs. The plan must include quarterly monitoring that addresses, at a minimum, the requirements listed in the SR Standard Eligibility Review Program Guide, including using all required elements and sample sizes. The coalition shall monitor the same SR child files within the sample for eligibility and payment validation criteria.

The coalition certifies that it has established and shall implement a monitoring plan, which includes, at a minimum, monitoring or testing of coalition subrecipient activities, reporting, corrective action resolution and tracking.

1. The coalition's subrecipient monitoring included each criterion the SR Standard Eligibility Review Program Guide lists. *(Grant Agreement, Exhibit II, D.6)*

OEL did not review this criterion because the coalition provides SR services directly.

2. The coalition followed the sample size guidelines during subrecipient monitoring for SR child eligibility and payment validation. *(Grant Agreement, Exhibit II, D.6)*

OEL did not review this criterion because the coalition provides SR services directly.

X. School Readiness Payment Validation

Using the established risk assessment methodology, the OEL team sampled 27 SR child files for payment validation for April, May, June and July 2017. The team also evaluated the records for absences based on OEL attendance rules. The team compared attendance records and noted any discrepancies. See the payment validation spreadsheet for specific record detail.

SRPV-A. Attendance Monitoring

A coalition shall have well-defined procedures for attendance monitoring and provider payments. An SR provider must maintain daily attendance documentation, which, at a minimum, shall include a sign-in/sign-out process that a coalition approves to validate attendance data. A coalition must implement a records retention policy for maintaining all documentation according to sub-grant award provisions.

Additionally, Rule 65C-22.001(10), FAC, Child Care Standards General Requirements, states that "daily attendance of children shall be taken and recorded by the child care facility personnel, documenting the time when each child enters and departs a child care facility or program. The custodial parent may document the time when their child(ren) enter and depart the child care facility or program. However, child care facility personnel are responsible for ensuring that attendance records are complete and accurate."

Note – When OEL determines that a finding is due to a provider error rather than a coalition error, OEL will document the finding in the work papers, but not include it in the final report.

1. **The coalition has an Enrollment/Attendance Certification for each child enrolled in the SR Program.** (ss. 1002.82(2)(p), 1002.84(9)-(10) and 1002.89(6)(c)4, F.S.; Rule(s) 6M-4.500 and 65C-22.001(10), FAC)

The coalition met all requirements for this criterion.

2. **The Enrollment/Attendance Certification report matches the parent's sign-in/sign-out sheets, and the provider completed both according to rule.** (ss. 1002.82(2)(p) and 1002.89(6)(c)4, F.S.; Rule(s) 6M-4.500 and 65C-22.001(10), FAC)

The coalition met all requirements for this criterion.

3. **The provider correctly documented excessive absences.** (Rule 6M-4.500, FAC)

The coalition met all requirements for this criterion.

4. **The Final Provider Reimbursement Report matches the Enrollment/Attendance Certification.** (s. 1002.82(2)(n) and (p), F.S.; Rule 6M-4.500-501, FAC)

The coalition met all requirements for this criterion.

SRPV-B. Provider Reimbursement

Each coalition is responsible for implementing a records retention policy for maintaining all documentation in compliance with sub-grant award provisions. The coalition or its designee must conduct monitoring activities to verify payment accuracy for monthly reimbursement requests.

Summary for all criteria related to payment – When a coalition identifies a discrepancy, it must document the following information to support findings – appropriate screen prints, copies of incorrect income sheets/notices, copies of corrected calculations and copies of attendance and reimbursement records.

1. **The coalition correctly subtracted the parent copayment amount from the reimbursement payment.** (45 CFR s. 98.42(a) and (b); s. 1002.84(8), F.S.; Rule 6M-4.400, FAC; CCDF State Plan 3.4)

The coalition met all requirements for this criterion.

2. **The SR payment rate is correct.** (s. 1002.85(2)(c)7, F.S.; Rule 6M-4.500, FAC)

The coalition met all requirements for this criterion.

3. **The SR payment rate is less than or equal to the provider's private pay rate.** (CCDF State Plan 3.4.5 and 4.3.2)

The coalition met all requirements for this criterion.

4. **The coalition documented that the payment cleared the coalition's financial institution/bank.** (ss. 1002.82(2)(p) and 1002.84(9), F.S.)

The coalition met all requirements for this criterion.

5. **The amount paid to the provider matches the amount owed based on the closed reimbursement amount in the OEL Statewide Information System.** (s. 1002.82(2)(n) and (p), F.S.)

The coalition met all requirements for this criterion.

6. **The SR Gold Seal rate is correct and the provider was eligible for the Gold Seal payment during the sample period.** (s. 1002.85(2)(c)7, F.S.; Rule 6M-4.500(6), FAC)

The coalition met all requirements for this criterion.

XI. Voluntary Prekindergarten Child Eligibility

VPK law requires OEL to adopt procedures that govern a coalition or school district's enrollment and eligibility determination of a child in the VPK Program (s. 1002.75(2)(a), F.S.). A coalition determines a child's eligibility based on Rule(s) 6M-8.200 and 8.202, FAC.

During the 2016-17 fiscal year, the coalition served 4,914 children in the VPK Program. Using the established risk assessment methodology, the review team examined 22 VPK child files for compliance with the VPK Program. The sample represents 0.4 percent of the total VPK children the coalition served. One of the reviewed files contained one or more findings.

VPKC-A. Child Age and Residential Eligibility

To be eligible for VPK or VPK Specialized Instructional Services (SIS), each child who resides in Florida who reaches the age of 4 years on or before Sept. 1 of the school year is eligible for the Voluntary Prekindergarten Education Program during either that school year or the following school year. The child remains eligible until kindergarten admittance, or unless the child reaches the age of 6 years by Feb. 1 of any school year under s. 1003.21(1)(a)1, F.S.

A coalition must include, in the family's file, verification that the applicant currently resides in Florida. A coalition may verify residency information with documentation that includes an in-state physical address. There is no minimum length of time an applicant must reside in Florida to obtain benefits. The applicant may also be a temporary resident in a domestic violence center or homeless shelter in Florida or authorized emergency management location.

- 1. The coalition determined and appropriately documented that each child's eligibility based on statutory age requirements.** (*ss. 1002.53(2) and 1002.66(1)(a), F.S.; Rules 6M-8.201(3)(a) and 6M-8.500(1), FAC*)

The coalition met all requirements for this criterion.

- 2. The coalition established that each applicant is a Florida resident.** (*s. 1002.53(2), F.S.; Rules 6M-8.201(3)(b) and 6M-8.500(1), FAC*)

The coalition met all requirements for this criterion.

VPKC-B. Child Registration and Application (VPK and VPK SIS), Child Eligibility and Enrollment Certificate (COE) and Parent Guide

A parent wishing to register his or her child in the VPK Program must complete and submit Form OEL-VPK 01 (May 2016), Voluntary Prekindergarten (VPK) Education Program Child Application, through the single point of entry (the Family Portal) established under s. 1002.53, F.S., using personal means or with assistance available at an early learning coalition.

If a parent wishes to register his or her child in the VPK SIS Program, the parent must complete and submit Form OEL-VPK 01 (May 2016), titled Voluntary Prekindergarten (VPK) Education Program Child Application, through the single point of entry. In addition to Form OEL-VPK 01, the parent must complete Form OEL-VPK 01S (Supplemental Student Application) and submit to the coalition an individual education plan that the local school district developed.

Once a coalition determines that a child is eligible for the VPK or VPK SIS program, after reviewing documentation submitted via the Family Portal, the coalition issues to the child's parent Form OEL-VPK 02 (COE) or Form OEL-VPK 02S Part A and B (SIS COE and Schedule of Services). The provider and the parent

must sign the form. A VPK provider may only enroll a child in the VPK Program after a coalition determines that the child is eligible for the program. To enroll an eligible child, the VPK provider admitting the child must complete the remainder of the Forms OEL-VPK 02 (COE) or OEL-VPK 02S Part A and submit verification of the completed form to the coalition to finalize the child's enrollment with the provider. A coalition, upon receiving the completed COE, shall complete a child's enrollment in EFS by recording an association between the child and the child's selected VPK provider.

Note – A child who is a Florida resident does not have to reside in a county the coalition serves in order to enroll in a VPK Program site that is in a county the coalition serves. However, a VPK provider may only enroll a child with the coalition in the same county as the provider's VPK site, regardless of the county in which the child resides (Rule 6M-8.201(5)(c), FAC).

1. **There is a completed, signed and dated Form OEL-VPK 01/OEL-VPK 01S (VPK and VPK SIS) for each child.** (*ss. 1002.53(4), 1002.66 and 1002.75(2)(a), F.S.; Rules 6M-8.201(1),(4)(e) and 6M-8.500(2), FAC*)

The coalition met all requirements for this criterion.

2. **There is a completed, signed and dated Form OEL-VPK 02 (COE)/OEL-VPK 02S Part A (SIS COE) for each child.** (*s. 1002.66, F.S.; Rules 6M-8.201(6) and 6M-8.500(2)(c), FAC*)

The coalition met all requirements for this criterion.

3. **There is documentation from the provider stating the child's VPK class assignment.** (*Rule 6M-8.201(4)(b) and (5)(d), FAC*)

The coalition met all requirements for this criterion.

VPKC-C. Reenrollment

The coalition may not reenroll a VPK child except as described in Rule 6M-8.210, FAC. A child may only reenroll with a VPK provider during the program year(s) for which the child is eligible according to s. 1002.53(2), F.S. Rule does not require resubmission of age and residential eligibility documentation in order for a child to reenroll.

If a child has not completed more than 70 percent of the instructional hours for the program type or a child has not expended more than 70 percent of the funding authorized for a child enrolled in VPK Specialized Instructional Services (SIS) under s. 1002.66, F.S., the child is eligible for reenrollment for good cause. Reenrollment for good cause occurs when a child withdraws from a VPK provider, after the child has attended a portion of the VPK instructional hours, and enrolls with a new VPK provider of the same VPK program type. For funding purposes, a child reenrolled under this subsection shall not exceed one full-time equivalent (FTE) child, as s. 1002.71(2), F.S., defines. There are two categories of reenrollment for good cause – primary reenrollment due to good cause and subsequent reenrollment exemption due to good cause.

Note – Reenrollment will be temporarily unavailable in the Family Portal after the Rule 6M-8.210, FAC, effective date of July 28, 2016. Coalitions used paper versions of forms until functionality became available and maintained a file (electronic or paper).

- **Primary reenrollment for good cause** – A coalition may reenroll a child for primary reenrollment due to good cause after a child withdraws from his or her initial VPK provider and reenroll at another VPK provider within the same program type if the following criteria applies –
 - The child has attended a portion of the VPK program, but has not substantially completed the VPK program.

- The child has not previously reenrolled in the VPK program.
- The child's parent or guardian completes the Reenrollment Application (Form OEL-VPK 05) on the Family Portal by using personal means or with assistance available at an early learning coalition.
- The child has one of the applicable circumstances listed in Rule 6M-8.210(3)(a)4, FAC.
- **Subsequent reenrollment exemption for good cause** – A coalition may reenroll a child for subsequent reenrollment due to good cause after a child reenrolls and subsequently withdraws from the VPK provider, then reenrolls at another VPK provider within the same program type if all of the following apply –
 - The child has attended a portion of the VPK program, but has not substantially completed the VPK program.
 - The child has reenrolled under subsection (3) or (4) of Rule 6M-8.210, FAC.
 - The child's parent or guardian completes the Reenrollment Application (Form OEL-VPK 05) with supporting documentation to the Family Portal by using personal means or with assistance available at an early learning coalition.
 - The child has one of the applicable circumstances listed in Rule 6M-8.210(3)(b)4, FAC.
- **Reenrollment for extreme hardship for summer VPK** – Reenrollment for extreme hardship occurs when a child withdraws from a VPK provider after the child has attended a portion of the VPK instructional hours and enrolls with a VPK provider during a summer VPK program. For funding purposes, the coalition may reenroll a child and report it as one full-time equivalent (FTE) child, as s. 1002.71(2), F.S., defines, in a summer VPK program if the child meets the reenrollment criteria in this subsection. There are two categories of reenrollment for extreme hardship – primary reenrollment due to extreme hardship and subsequent reenrollment exemption due to extreme hardship.
- **Primary reenrollment exemption due to extreme hardship** – A coalition may reenroll a child for primary reenrollment due to extreme hardship after a child withdraws from the initial VPK provider and reenrolls at another VPK provider within the same program type if all of the following applies –
 - The child has attended a portion of the VPK program, but has not substantially completed the VPK program
 - The child has not previously reenrolled in the VPK program.
 - The child's parent or guardian completes the Reenrollment Application (Form OEL-VPK 05) with supporting documentation to the Family Portal using personal means or with assistance available at an early learning coalition.
 - The child has one of the applicable circumstances listed in Rule 6M-8.210(4)(a), FAC.
- **Subsequent reenrollment exemption due to extreme hardship** – A coalition may reenroll a child for subsequent reenrollment due to extreme hardship after a child reenrolls into a VPK provider and subsequently withdraws and reenrolls at another VPK provider within the summer VPK program if all of the following apply –
 - The child has attended a portion of the VPK program, but has not substantially completed the VPK program.
 - The child has reenrolled under subsection (3) of Rule 6M-8.210, FAC.
 - The child's parent or guardian completes the Reenrollment Application (Form OEL-VPK 05) with supporting documentation to the Family Portal using personal means or with assistance available at an early learning coalition.
 - The child has one of the applicable circumstances listed in Rule 6M-8.210(4)(a)4, FAC.
- **Reenrollment for children in the VPK SIS program** – Changing SIS providers while enrolled in the SIS program type does not constitute a reenrollment under Rule 6M-8.210, FAC. A coalition may reenroll a child under subsection (3) or (4) of the rule into a VPK SIS program from a school-year or summer program type or from a VPK SIS program into a school-year or summer program type, as applicable. However, a child shall not reenroll from VPK SIS school-year program type to a VPK SIS summer program type under subsection (4) of the rule. For a reenrollment due to good cause, the funding available to the child shall be equal to the child's initial FTE allocation for the program type in which the child was previously enrolled, minus any amount previously paid for such services rendered to the child. A

reenrollment under this subsection may be into a subsequent program year as defined in subsection (6) of the rule.

- **Reenrollment into subsequent program year** – The coalition may only reenroll a child into a subsequent program year if all of the following apply –
 - The child reaches 4 years old between Feb. 2 and Sept. 1 of his or her initial program year of eligibility as described in s. 1002.53(2), F.S.
 - The child has not yet been admitted to kindergarten and the child receives a reenrollment under subsection (3) or (4) of Rule 6M-8.210, FAC.
 - The coalition shall calculate the remaining FTE for a child who reenrolls for good cause into a subsequent program year as the total FTE hours for the program type minus the hours the child has expended, including paid absences.

1. **If applicable, the coalition reenrolled the child according to VPK rule and program requirements.** (s. 1002.66, F.S.; Rules 6M-8.210 and 6M-8.500(6)(b), FAC; Grant Agreement, Exhibit II, 9.2.1)

The coalition met all requirements for this criterion.

VPKC-D. Statewide Information System Accuracy

The Grant Agreement requires coalitions to use the most current release of the OEL's statewide information system, currently the Enhanced Field System (EFS) and the Family Portal. Coalitions must use OEL's statewide information system to establish eligibility for child care funding. EFS data and other OEL statewide information systems must accurately reflect the most current household circumstances that the applicant presented to the coalition. EFS data is the basis for reimbursement and federal and state reporting.

The review shall consist of comparing VPK child eligibility files against OEL's statewide information system records for entry accuracy, timeliness of processing actions and case history note narrations.

1. **The information in each VPK child file matches the information in OEL's statewide information system.** (s. 1002.82(2)(n), F.S.; Grant Agreement, Exhibit II, C.2-3)

Finding(s) –

File No. 7 – The mother's birthdate in EFS does not match the one on her driver's license or the child's birth certificate.

OEL requires no further corrective action(s) –

The coalition corrected the following file(s) – #7

VPKC-E. Eligibility Policies and Procedures

Section 1002.53(2), F.S., establishes the VPK Program for each child who resides in Florida who will reach the age of 4 years on or before Sept. 1 of the school year is eligible for the Voluntary Prekindergarten Education Program during either that school year or the following school year. The child remains eligible until the child is admitted to kindergarten, or unless he or she will have attained the age of 6 years by Feb. 1 of any school year under s. [1003.21\(1\)\(a\)1](#), F.S. A coalition's policies shall align with VPK Program rule and statute. A coalition shall have local policies to prevent its and its contractor's procedures from discriminating against children and to guide the coalition in meeting enrollment requirements and timeframes (Grant Agreement, Exhibit II, C.9).

1. **The coalition's eligibility determination policies and procedures follow rules and statutes.** (s. 1002.53, F.S.; Grant Agreement, Exhibit II, C.9.1.9; Rules 6M-8 and 6A-6.03033, FAC)

The coalition met all requirements for this criterion.

VPKC-F. Previous Corrective Actions

OEL examined previous findings and coalition follow-up actions to determine whether the coalition is in compliance with the corrective action plan OEL accepted following the coalition's most recent VPKC accountability review.

1. VPKC corrective action plan adherence. *(Grant Agreement, Exhibit II, D.6 and F.8)*

This criterion is not applicable. The coalition had no previous corrective actions.

VPKC-G. VPK Child Subrecipient Monitoring

The Grant Agreement, Exhibit II, D.6, requires a coalition to have and implement an annual monitoring plan documenting the coalition's intended monitoring procedures for all contracts, grants, agreements and programs. The plan must include quarterly monitoring that addresses, at a minimum, the requirements listed in the VPK Standard Eligibility Review Program Guide, including using all required elements and sample sizes. The coalition shall monitor the same VPK child files within the sample for eligibility and payment validation criteria.

The coalition certifies that it has established and shall implement a monitoring plan, which includes, at a minimum, monitoring or testing of coalition subrecipient activities, reporting, corrective action resolution and tracking.

1. The coalition's subrecipient(s) monitoring includes each VPK child and payment validation criterion the VPK Standard Eligibility Review Program Guide lists. *(Grant Agreement, Exhibit II, D.6)*

OEL did not review this criterion because the coalition provides VPK services directly.

2. The coalition followed the sample size guidelines during subrecipient(s) monitoring for VPK child eligibility and payment validation. *(Grant Agreement, Exhibit II, D.6)*

OEL did not review this criterion because the coalition provides VPK services directly.

XII. Voluntary Prekindergarten Payment Validation

Using the established risk assessment methodology, the OEL team sampled 22 VPK child files for payment validation for April, May, June and July 2017. The team also evaluated the records for absences based on OEL attendance rules. The team compared attendance records and noted any discrepancies. See the payment validation spreadsheet for specific record detail.

VPKPV-A. VPK Attendance Monitoring

A coalition shall have well-defined procedures for attendance monitoring and provider payments. A coalition must implement a records retention policy for maintaining all documentation according to sub-grant award provisions. A coalition must conduct monitoring activities to verify payment accuracy for monthly reimbursement requests.

A VPK provider must keep a daily record of a child's attendance in the program and require the parent to verify the child's attendance monthly for the prior month using VPK daily attendance forms –

- **Form OEL-VPK 03S (Child Attendance and Parental Choice Certificate Short)** – The parent may use the short form if the VPK provider records daily attendance using a paper sign-in/sign-out log that includes the date, child's name and signature of the parent or other person dropping the child off at or picking the child up from the VPK site, or an electronic attendance-tracking system that records the date, time, child's name and electronic signature; card swipe; personal identification number entry; or similar daily action the parent or other person dropping off at or picking the child up from the VPK site takes.
- **Form OEL-VPK 03L (Child Attendance and Parental Choice Certificate Long)** – If the provider does not maintain daily sign-in/sign-out logs, the parent must complete and sign Form OEL-VPK 03L that states on

which days the child attended for that month. A coalition pays a VPK provider according to OEL's Uniform Attendance Policy for Funding the VPK Program and Advance Payment and Reconciliation for the VPK Program Rules.

Note – Section 1002.66, F.S., establishes the VPK SIS program as a reimbursement program for services rendered. OEL does not require a VPK SIS provider to maintain sign-in/sign-out sheets or complete an Attendance Certification. A VPK SIS provider will maintain and submit a VPK-02S Part B (Schedule of Services), which serves as an invoice and attendance certification for reimbursement.

Note – When OEL determines that a finding is due to a provider error rather than a coalition error, OEL will document the finding in the work papers, but not include it in the final report.

1. **The coalition has completed Enrollment/Attendance Certification or OEL-VPK 02S Part B for each child enrolled in the VPK Program.** (*ss. 1002.66 and 1002.71(6), F.S.; Rules 6M-8.305(3) and 6M-8.500(5), FAC*)

Finding(s) –

File No. 14 – The coalition did not enter the date the coalition processed payment to the SIS provider in section 16 on Form OEL-VPK 02S Part B.

OEL requires no further corrective action(s) –

The coalition corrected the following file(s) – #14

2. **The provider maintains and completes Forms OEL-VPK 03S or OEL-VPK 03L according to rule.** (*s. 1002.71(6), F.S.; Rule 6M-8.305(1) and (2), FAC*)

The coalition met all requirements for this criterion.

3. **The Enrollment/Attendance Certification matches the parent's sign-in/sign-out sheets and Form OEL-VPK 03S or Form OEL-VPK 03L.** (*s. 1002.71(6), F.S.; Rule 6M-8.305, FAC*)

While there were no coalition-related findings for this criterion, OEL documented observations associated with this criterion in the VPK payment validation work papers.

4. **The provider correctly documented absences and temporary emergency closures.** (*Rule 6M-8.204, FAC*)

The coalition met all requirements for this criterion.

5. **The Final Provider Reimbursement Report matches the Enrollment/Attendance Certification or VPK-02S Part B (Schedule of Services).** (*ss. 1002.66 and 1002.71(6), F.S.; Rules 6M-8.305 and 6M-8.500(5), FAC*)

The coalition met all requirements for this criterion.

VPKPV-B. VPK Provider Reimbursement

Coalitions must implement a record retention policy for maintaining all documentation according to the sub-grant award. A coalition or its designee must conduct monitoring activities to verify the accuracy of payments of the monthly reimbursement requests.

After a coalition approves Enrollment/Attendance Certification, the coalition will generate a provider reimbursement report for the net reimbursement amount the coalition must pay the provider. A coalition will pay the provider by electronic funds transfer (EFT) or warrant (check). A coalition should verify that the provider received the payment.

A coalition may not pay the final payment for the VPK program year until the provider submits a final verification, which certifies the paid hours of attendance of each child enrolled for the program year (Rule 6M-8.305(3), FAC), of the annual cumulative attendance of each child enrolled in the program.

Summary for all criteria related to payment – When the analyst identifies discrepancies, the analyst must document the following information to support the findings – appropriate screen prints, copies of incorrect income sheets/notices, copies of corrected calculations and copies of attendance and reimbursement records.

1. VPK rates are correct for the provider's county. (*s. 1002.71(3), F.S.; Rule 6M-8.205, FAC*)

The coalition met all requirements for this criterion.

2. The coalition documented that the payment cleared the coalition's financial institution/bank. (*s. 1002.82(2)(p), F.S.*)

The coalition met all requirements for this criterion.

3. The amount paid to the provider matches the amount owed based on the closed reimbursement amount in EFS. (*s. 1002.82(2)(n) and (p), F.S.; Rules 6M-8.204 and 6M-8.205, FAC*)

The coalition met all requirements for this criterion.

XIII. Voluntary Prekindergarten Provider

A coalition administers the VPK Program through the service delivery of a VPK provider. Even after a coalition has determined that a provider is eligible to deliver the program, a coalition has an ongoing duty to verify the provider's compliance with Florida Statutes, state rules and coalition procedures.

During the 2016-17 fiscal year, there were 184 VPK providers in the coalition's service area. Using the established risk assessment methodology, the OEL team sampled 73 VPK classroom director and instructor credentials and qualifications within 20 child care provider sites to establish whether all instructors met qualifications before the coalition authorized the instructors to enter the classroom. The sample represents 11 percent of the total VPK providers in the service area. None of the instructor files reviewed contained one or more findings.

VPKP-A. VPK Provider Eligibility and Class Registration

Before delivering instruction or receiving payment for VPK Program services, a VPK provider must submit complete and signed Forms OEL-VPK 10 (Statewide Provider Registration Application) and Form OEL-VPK 11 (Class Registration Application) Parts A and B with supporting documentation. A coalition must follow procedures for classroom registration that Rule 6M-8.300, FAC, describes. During the program year, if there are any changes that would affect the information the provider initially supplied on the OEL-VPK 10, 11A or 11B during the registration process, the VPK provider must give written notice to the coalition within 14 calendar days from the date the change occurred. In order to properly notify the coalition, the provider may complete an updated OEL-VPK 10, 11A or 11B or local form that includes required information. Private and public school providers must complete Forms OEL-VPK 10 and OEL-VPK 11A and 11B for each VPK site and submit the completed forms to the coalition. The forms are available at http://www.floridaearlylearning.com/providers/provider_menu/forms_for_sr_and_vpk_providers.aspx.

The coalition must update forms annually, at a minimum –

- **Form OEL-VPK 10 (Statewide Provider Registration Application)** – VPK provider registering for the VPK Program must annually complete and sign Form OEL-VPK 10 before delivering instruction or receiving payment for the VPK Program. A provider must submit Form OEL-VPK 10 to the coalition in the county of

the VPK provider's site. If a VPK provider has more than one VPK site, the provider must submit a separate Form OEL-VPK 10 for each site.

- **Form OEL-VPK 11, Parts A and B (Class Registration Application)** – A VPK provider may not deliver instruction or receive payment until the provider submits annually completed and signed Forms OEL-VPK 11A (Instructors) and OEL-VPK 11B (Calendars). If the VPK provider has more than one VPK class, the provider may submit information for multiple classrooms on each form with supporting documents for each class. The director, owner, operator, principal or school district staff at a private provider or public school must submit Form OEL-VPK 11A and B to the coalition annually. The coalition must complete the OFFICIAL USE ONLY section on the bottom of Forms OEL-VPK 11A and 11B to verify that the coalition reviewed the form for accuracy and timeliness.

OEL recommends that the coalition date stamp the OEL-VPK 10, 11A, 11B or local forms for clear and concise proof of receipt.

1. There is a completed, signed and dated Form OEL-VPK 10 (Statewide Provider Registration Application) for each provider. (Rule 6M-8.300(1), FAC)

The coalition met all requirements for this criterion.

2. There is a completed, signed and dated Form OEL-VPK 11A and B (Class Registration Application) for each class. (Rules 6M-8.204(3)(a)-(b) and 6M-8.300(2), FAC)

Finding(s) –

File Nos. 25, 28 – The coalition removed the instructor from the VPK class and EFS. The coalition did not document the employee's last day in the classroom on Form OEL-VPK 11A as rule requires.

OEL requires no further corrective action(s) –

The coalition corrected the following file(s) – #25, 28

VPKP-B. Statewide Provider Contract

Before a provider may deliver instruction or receive payment for the VPK Program, a coalition must verify that both it and the VPK provider (private or public school) signed a Form OEL-VPK 20 (Statewide VPK Provider Contract, including either Form OEL VPK 20PP (Private Provider) or Form OEL VPK 20PS (Public School), as appropriate, or Form OEL-VPK 20S (Specialized Instructional Services Provider Agreement). The VPK provider may not offer services or instruction until the provider receives notice from the coalition of its eligibility to offer VPK services.

A public school district may sign a single provider agreement (Form OEL-VPK 20 or 20S) on behalf of all public school VPK providers in the district, and the owner or manager of multiple private VPK providers within the coalition's service area may sign a single provider agreement on behalf of all of his or her VPK providers. A coalition does not have to pay for costs the provider incurs before the agreement's beginning date or after the agreement's ending date.

The OEL review examines VPK classroom instructors' credentials and qualifications within private child care provider sites to establish whether all instructors met qualifications before a coalition authorized the instructors to enter the classroom. Each VPK class must have at least one VPK instructor qualified to act as a VPK instructor. In addition to VPK instructor qualifications, a VPK SIS instructor must have certification or a license for applied behavior analysis; be a speech language pathologist, occupational therapist, physical therapist, clinical social worker or psychologist; or have approval from the Florida Department of Education (DOE) as Rule 6A-6.03033, FAC, describes. A VPK instructor must be of good moral character, must complete a level 2 background

screening before entering the classroom and submit and clear a background rescreening every five years, and must not be ineligible to teach in a public school due to a suspended or revoked educator certificate.

Note – The VPK SIS provider is subject to licensing/certification requirements specific to the individual license/certification. The accountability review will not include requests for documentation regarding level 2 background screening or good moral character requirements for VPK SIS providers.

Statute defines time limits on validity for VPK coursework or credential requirements. All instructors must have valid credentials before entering a VPK classroom and maintain valid credentials while acting as a VPK instructor. A private VPK provider must have a VPK director who has a VPK director credential that meets or exceeds the minimum standards adopted under s. 1002.57, F.S. A VPK director who earned a director credential on or before Dec. 31, 2006, is exempt from completing additional requirements to obtain a VPK endorsement. A director who received a director credential on or after Jan. 1, 2007, must complete a series of requirements to receive a VPK endorsement.

1. **There is a completed, signed and dated Form OEL-VPK 20 or Form OEL-VPK 20S containing all required information and attachments.** (ss. 1002.55(3)(i), 1002.55(3)(j) and (k), 1002.61(3)(b), 1002.66 and 1002.75, F.S.; Rules 6M-8.301 and 6M-8.500(4)(b), FAC; Grant Agreement, Exhibit II, C.9.4)

The coalition met all requirements for this criterion.

2. **Each private provider met the requirements for a legally operating provider eligible to deliver the VPK Program.** (ss. 1002.55(3)(a)-(b), 1002.61(3), 1002.63(3), 1002.66(4), 1002.67(3)-(4) and 1002.91(7), F.S., and Rules 6A-6.03033 and 6M-8.500(3)(a), FAC)

The coalition met all requirements for this criterion.

3. **Each private VPK provider has a director with a valid director credential and, if applicable, a VPK Director Endorsement.** (ss. 1002.51(5), 1002.55(3)(g), 1002.57, F.S.; Rule 6M-8.610, FAC)

The coalition met all requirements for this criterion.

4. **Each lead instructor meets the required credentials.** (Rule 6M-8.615, FAC; ss. 1002.55(3)(c), 1002.55(4), 1002.59(1) and (2), 1002.61(4), 1002.63(4) and (5), 1002.67(1), F.S.)

The coalition met all requirements for this criterion.

5. **Each substitute instructor meets the required credentials.** (ss. 1002.55(3)(e), 1002.61(6), 1002.63(6), F.S.; Rule 6M-8.410, FAC)

The coalition met all requirements for this criterion.

6. **Each VPK director, lead, substitute and secondary instructor for each class a provider offers has evidence of a current level 2 background screening clearance for the entire class schedule.** (ss. 435.04, 1002.55(3)(d)-(e), 1002.61(5) and 1002.63(5), F.S.; Rules 65C-22.006 and 6M-8.410, FAC)

The coalition met all requirements for this criterion.

7. **Each VPK director, lead, substitute and secondary instructor for each class that a private provider offers has evidence of a signed and current Affidavit of Good Moral Character (AGMC).** (ss. 435.04 and 1002.55(3)(d)-(e), F.S.; Rules 6M-8.410 and 65C-22.006(4)(d)3, FAC)

The coalition met all requirements for this criterion.

VPKP-C. Program Class Sizes

A school-year program may not begin instruction more than 14 days before Labor Day or, if the uniform date fixed by a district school board under s 1001.42(4)(f), F.S., for the opening of public schools for regular school programs occurs in a county more than 14 days before Labor Day. A summer program may not begin instruction before May 1. A VPK class may not exceed 20 children for a school-year program or 12 children for a summer program. If a mixed group of VPK and non-VPK children are in a class, both groups count toward the 20-child or 12-child maximum class size. A VPK class may not exceed the maximum class size enrollment or attendance on a particular day. For school-year classrooms with 12 or more children, a secondary instructor must be present.

- 1. The coalition verified that VPK providers met applicable child/teacher ratios for VPK classes during the review period.** (ss. 1002.53(6)(b), 1002.55(3)(f), 1002.61(7), 1002.63(7), F.S.; Rules 6M-8.204(3) and 6M-8.400, FAC)

The coalition met all requirements for this criterion.

VPKP-D. Statewide Kindergarten Screening; Kindergarten Readiness Rates

Section 1002.69(5), F.S., requires OEL to determine kindergarten readiness rates. For the 2014-2015 and 2015-2016 Voluntary Prekindergarten Education Program years, OEL shall not adopt a kindergarten readiness rate. Any private prekindergarten provider or public school that was on probation pursuant to s. 1002.67(4)(c), F.S., for the 2013-2014 program year shall remain on probation until the provider or school meets the minimum rate OEL adopted. This section expires July 1, 2017.

- 1. The coalition or school district required all providers (private and school district sites) on probation to submit an improvement plan prior to registering to offer VPK services for the next program year.** (ss. 1002.67 and 1002.69, F.S.; Rules 6M-8.700(2) and 6M-8.701(2), FAC; Grant Agreement, Exhibit II, C.9.5)

The coalition met all requirements for this criterion.

- 2. For all sampled VPK providers on probation (private and school district sites), the coalition or school district approved or disapproved the improvement plans within 14 days after receipt.** (s. 1002.67, F.S.; Rules 6M-8.700 and 6M-8.701, FAC)

The coalition met all requirements for this criterion.

- 3. The coalition or school district required all sampled providers (private and school district sites) to implement an improvement plan according to rule.** (ss. 1002.67 and 1002.69, F.S.; Rules 6M-8.700(2), 6M-8.605 and 6M-8.701(1) and (2), FAC; Grant Agreement, Exhibit II, C.9.5.1 and 9.5.2)

The coalition met all requirements for this criterion.

- 4. Providers on probation for two or more consecutive years who subsequently failed to meet the minimum readiness rate received approval for a good cause exemption from OEL or the coalition removed the providers from delivering the program.** (ss. 1002.67(4)(c)3 and 1002.69(7), F.S.; Rules 6M-8.603 and 6M-8.702, FAC; Grant Agreement, Exhibit II, C.9.5.1 and 9.5.2)

The coalition met all requirements for this criterion.

- 5. The coalition verified all sampled providers on probation that chose the DOE-approved staff development plan, administered assessment period 2 (AP2) and submitted the assessment data in Bright Beginnings.** (Rule 6M-8.605, FAC; Grant Agreement, Exhibit II, C.9.6.1 and 9.6.2)

The coalition met all requirements for this criterion.

VPKP-E. Voluntary Prekindergarten (VPK) Pre- and Post-Assessment Compliance

Contingent upon legislative appropriation, each private prekindergarten provider and public school in the Voluntary Prekindergarten Education Program must implement an evidence-based pre- and post-assessment that the State Board of Education has approved.

In order to receive approval, the assessment must be valid, reliable, developmentally appropriate and designed to measure student progress on domains that must include, but are not limited to, early literacy, numeracy and language.

Individuals who meet State Board of Education requirements must administer the pre- and post-assessment.

1. **The coalition approved or disapproved, according to rule, all providers' pre- and post-assessment orders that contracted VPK providers placed.** (*Rules 6M-8.620 and 6A-1.09433, FAC; Grant Agreement, Exhibit II, C.9.6.3*)

Finding(s) –

The coalition did not approve the pre- and post-assessment orders for 23 VPK classrooms within seven calendar days, as rule requires.

Recommendation(s) –

VPKP-E.1 – Develop and submit to OEL a process for verifying that the coalition approves or disapproves pre- and post-assessment orders for VPK providers within seven calendar days.

2. **The coalition verified that every private VPK Program provider administered assessment period 1 and 3 and submitted the assessment data in Bright Beginnings according to rule.** (*Rules 6M-8.620 and 6A-1.09433, FAC; Grant Agreement, Exhibit II, C.9.6.1 and 9.6.2*)

Finding(s) –

- **Item 1** – The coalition did not verify that one school-year VPK classroom administered AP1 for the 2016-2017 program year as Rule 6M-8.620, FAC, requires. The provider is not offering services during the 2017-2018 program year.
- **Item 2** – The coalition did not provide proof that five school-year VPK classrooms administered AP3 for the 2016-2017 program year as Rule 6M-8.620, FAC, requires. Two providers are offering services during the 2017-2018 program year.
- **Item 3** – The coalition did not verify that two school-year VPK classrooms submitted AP3 data into Bright Beginnings for the 2016-2017 program year as Rule 6M-8.620, FAC, requires. The provider only completed and entered AP3. These providers are not offering services during the 2017-2018 program year.

Recommendation(s) –

VPKP-E.2 –

- **Item 1** – Submit to OEL a tracking log to verify that VPK providers administer, enter and submit data into Bright Beginnings and evidence the coalition informed the provider of its ineligibility to offer VPK services for five years.
- **Item 2** – Submit to OEL evidence of the coalition's observations of completed AP3 assessments (AP3 booklets) during the onsite visit or proof of the provider's data entry of the AP3 in Bright Beginnings if the providers are currently offering services. Conduct provider training on properly completing the assessment process for the providers currently offering services. Submit evidence of a tracking log to verify that VPK providers administer, enter and submit data into Bright Beginnings.
- **Item 3** – Submit documentation of the coalition's attempts to notify the providers of failure to submit VPK assessment data during the 2016-2017 program year. The providers are currently not offering services. If executing a contract with the providers for 2018-2019 program year, conduct provider training

on properly completing the assessment process. Develop and implement a tracking log to verify that VPK providers submit all assessment data into Bright Beginnings. Submit to OEL.

VPKP-F. Statewide Information System Accuracy

The Grant Agreement requires a coalition to use the most current release of the OEL single statewide information system. A coalition must use the statewide information system to establish eligibility for VPK services. The OEL statewide information system is the basis for reimbursement and state reporting.

The review shall consist of comparing VPK provider eligibility files against statewide information system records for accuracy of entry, timeliness of processing actions and case history note narrations.

1. The information in each VPK provider file matches the information in OEL's statewide information system. (s. 1002.82(2)(n), F.S.; Rule 6M-8.300 (c), FAC; Grant Agreement, Exhibit II, C.2-3)

The coalition met all requirements for this criterion.

VPKP-G. VPK Provider Profiles

Section 1002.53(5), F.S., requires coalitions to provide each parent enrolling a child in the VPK Program with a profile of every private VPK provider and public school delivering the program within the county where the parent is enrolling the child. The profiles must include, at a minimum, the provider's or school's services, curriculum, instructor credentials and instructor-to-student ratio.

Coalitions must also provide the provider's or school's kindergarten readiness rate, calculated according to s. 1002.69, F.S., based on the most recent available statewide kindergarten screening results.

1. VPK profiles are available to all parents enrolling their children in the VPK Program. (s. 1002.53(5), F.S.; Rule 6M-8.201(4)(c-d), FAC; Grant Agreement, Exhibit II, C.9.1.8)

The coalition met all requirements for this criterion.

2. VPK profiles include the required areas. (s. 1002.53(5), F.S.; Rule 6M-8.201(4)(c-d), FAC; Grant Agreement, Exhibit II, C.9.1.8)

The coalition met all requirements for this criterion.

VPKP-H. Previous Corrective Actions

A coalition must submit a corrective action plan (CAP) response to OEL's written notices of non-compliance findings within 30 days and then implement the CAP response. The coalition certifies that it has established and shall implement a monitoring plan, which includes, at a minimum, monitoring or testing of coalition subrecipient activities, reporting, corrective action resolution and tracking.

OEL examined previous findings and coalition follow-up actions to determine whether the coalition is in compliance with the corrective action plan OEL accepted following the coalition's most recent VPKP accountability review.

1. VPKP corrective action plan adherence. (Grant Agreement, Exhibit II, D.6 and F.8)

The coalition met all requirements for this criterion.

VPKP-I. VPK Provider Subrecipient Monitoring

The Grant Agreement, Exhibit II, D.6, requires a coalition to have and implement an annual monitoring plan documenting the coalition's planned monitoring procedures for all contracts, grants, agreements and programs

according to state laws and rules and OEL guidance. The coalition must submit the plan to OEL by Oct. 1 and include quarterly monitoring that addresses, at a minimum, the requirements listed in the VPK Standard Eligibility Review Program Guide, including using all required elements and sample sizes.

The coalition certifies that it has established and shall implement a monitoring plan, which includes, at a minimum, monitoring or testing of coalition subrecipient activities, reporting, corrective action resolution and tracking.

1. The coalition's subrecipient monitoring included each VPK provider criterion the VPK Standard Eligibility Review Program Guide lists. (Grant Agreement, Exhibit II, D.6)

OEL did not review this criterion because the coalition provides VPK services directly.

2. The coalition followed the sample size guidelines during subrecipient monitoring for VPK provider eligibility. (Grant Agreement, Exhibit II, D.6)

OEL did not review this criterion because the coalition provides VPK services directly.

XIV. Data Accuracy

The team reviewed selected edit and exception reports, listed below. The purpose of the reports is to identify anomalies in EFS data that may indicate data entry error or non-compliance in SR or VPK eligibility. Not all files identified on the reports are in error. The review analysts identified instances during the review of these reports that required coalition follow-up and OEL team validation. Reports indicated by "*" are standard reports the OEL DQI unit runs and provides to the coalitions on a quarterly or monthly basis. OEL expects the coalition to follow up and correct identified items. The coalition shall comply with data correction requests or data cleansing activities as OEL communicated (Grant Award Exhibit II C.1).

DA-A. School Readiness (SR) Edit and Exception Reports

- ***Active SR File(s) with SSA/SSI Income** – Assists with identifying if the coalition properly included/excluded SSA/SSI income.
- ***Total Family Income Exceeds 200 Percent** – Identifies families who are eligible to begin the graduated phase-out of assistance.
- **Total Family Income Exceeds 85 Percent of SMI** – Identifies families who are potentially ineligible or over income for SR services.
- **Gold Seal Ad Hoc Report** – Identifies providers receiving a Gold Seal payment who have a missing certificate or error with the certificate begin or end date.
- **SR Redeterminations Report** – Identifies SR child enrollments that do not show an updated status in the applicable Statewide Information System after a client's scheduled redetermination date.

Based on the following EFS reports, the coalition complied with OEL requirements –

1. *Active SR File(s) with SSA/SSI Income (19)

Finding(s) –

The review team examined 20 case(s) for compliance. One of the reviewed cases contained one or more findings.

Case No. 18 – The award amount the coalition entered into EFS does not match the amount shown on the award letter.

OEL requires no further corrective action(s) –

The coalition corrected the following case(s) – #18 (updated EFS)

2. *Total Family Income Exceeds 200 Percent (29)

The coalition met all requirements for this criterion.

3. Total Family Income Exceeds 85 Percent of SMI

Finding(s) –

The review team examined two case(s) for compliance. One of the reviewed cases contained one or more findings.

Case No. 1 – The coalition entered an incorrect family income amount into EFS.

OEL requires no further corrective action(s) –

The coalition corrected the following case(s) – #1 (corrected the income amount)

4. Gold Seal Ad Hoc Report (1)

Finding(s) –

The review team examined six case(s) for compliance. All of the reviewed cases contained one or more findings.

- **Case No. 1** – The coalition did not enter the break in Gold Seal accreditation from Sept. 14, 2016, to Oct. 26, 2016.
- **Case No. 2** – The coalition entered Gold Seal accreditation dates into EFS incorrectly. The correct beginning date of accreditation should be Nov. 8, 2012, and the correct end date should be April 20, 2019.
- **Case No. 3** – The coalition did not enter the Gold Seal dates of July 31, 2017, to July 31, 2020, into the EFS system.
- **Case No. 4** – The coalition did not enter the initial Gold Seal dates of March 5, 2012, to March 5, 2017, into the EFS system.
- **Case No. 5** – The coalition did not enter the initial Gold Seal dates of April 24, 2017, to Feb. 13, 2020, into the EFS system.
- **Case No. 6** – The coalition did not enter the initial Gold Seal dates of Feb. 26, 2012, to Feb. 26, 2022, into the EFS system.

The coalition completed the following corrective action(s) –

The coalition corrected the following case(s) –

- #1 – Entered history notes into EFS with code GSAB.
- #5 – Corrected Gold Seal dates into EFS.

Recommendation(s) –

DA-A.4 –

- **Case No. 2** – Correct dates in EFS. Submit screenshot of correction to OEL.
- **Case Nos. 3, 4, 6** – Update the Gold Seal dates in EFS using the beginning date of the initial Gold Seal certificate and the end date of the most recent Gold Seal certificate. Submit screenshot of correction to OEL.

5. SR Redetermination Report

The coalition met all requirements for this criterion.

DA-B. Previous Corrective Actions

OEL examined previous findings and coalition follow-up actions to determine whether the coalition is in compliance with the corrective action plan OEL accepted following the coalition's most recent DA accountability review.

1. DA corrective action plan adherence.

This criterion is not applicable. The coalition did not have corrective actions requiring implementation for this review.

XV. Recommended Corrective Actions Summary Review

OEL requires the coalition to submit a corrective action plan (CAP) for all compliance issues within 30 days from receiving this accountability review report. The response should demonstrate the coalition's steps to address each compliance issue and the numbered findings on the monitoring spreadsheets. **For all uncorrected findings**, a corrective action plan must identify the cause of the initial finding(s) and the coalition's plan for continued compliance. See the recommendations below for how to correct findings and avoid future findings.

Coalition Governance (CG)

The coalition had no findings in this review area.

Operations and Program Management (OPM)

- **OPM-A.1, Item 2** – Revise the coalition's background screening procedures to include the missing element. Submit policy to OEL.
- **OPM-B.1, Item 1** – Submit to OEL the coalition's fraud notification process and evidence of staff training on the process.
- **OPM-C.2** – Submit to OEL documentation that shows the coalition utilized a tier 1 log that meets the requirement of Rule 6M-4.630, FAC.

Child Care Resource and Referral (CCR&R)

The coalition has no pending corrective actions for this review area.

Educational Services Delivery (ESD)

The coalition had no findings in this review area.

School Readiness Eligibility (SR)

SR-M.3 – Conduct staff training on calculating unearned family income. Submit evidence of training to OEL.

School Readiness Payment Validation (SRPV)

The coalition had no findings in this review area.

VPK Child Eligibility (VPKC)

The coalition has no pending corrective actions for this review area.

VPK Payment Validation (VPKPV)

See working papers for recommended actions in this review area.

VPK Provider Eligibility (VPKP)

- **VPKP-E.1** – Develop and submit to OEL a process for verifying that the coalition approves or disapproves pre- and post-assessment orders for VPK providers within seven calendar days.
- **VPKP-E.2** –
 - **Item 1** – Submit to OEL a tracking log to verify that VPK providers administer, enter and submit data into Bright Beginnings and evidence the coalition informed the provider of its ineligibility to offer VPK services for five years.
 - **Item 2** – Submit to OEL evidence of the coalition’s observations of completed AP3 assessments (AP3 booklets) during the onsite visit or proof of the provider’s data entry of the AP3 in Bright Beginnings if the providers are currently offering services. Conduct provider training on properly completing the assessment process for the providers currently offering services. Submit evidence of a tracking log to verify that VPK providers administer, enter and submit data into Bright Beginnings.
 - **Item 3** – Submit documentation of the coalition’s attempts to notify the providers of failure to submit VPK assessment data during the 2016-2017 program year. The providers are currently not offering services. If executing a contract with the providers for 2018-2019 program year, conduct provider training on properly completing the assessment process. Develop and implement a tracking log to verify that VPK providers submit all assessment data into Bright Beginnings. Submit to OEL.

Data Accuracy (DA)

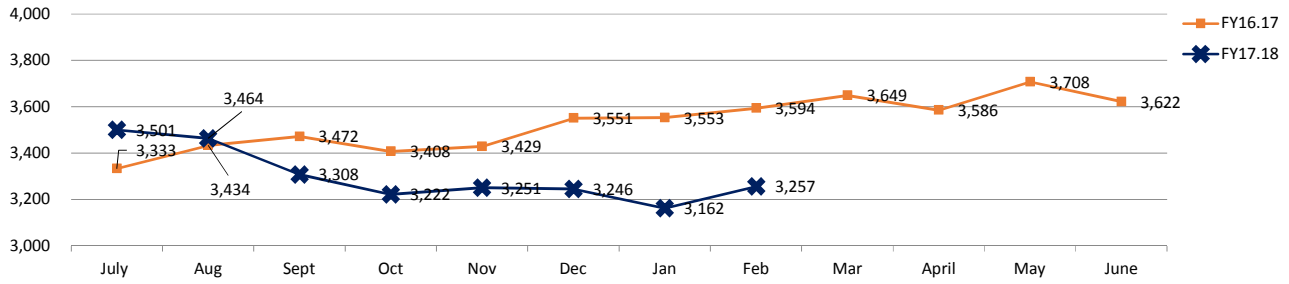
DA-A.4 –

- **Case No. 2** – Correct dates in EFS. Submit screenshot of correction to OEL.
- **Case Nos. 3, 4, 6** – Update the Gold Seal dates in EFS using the beginning date of the initial Gold Seal certificate and the end date of the most recent Gold Seal certificate. Submit screenshot of correction to OEL.

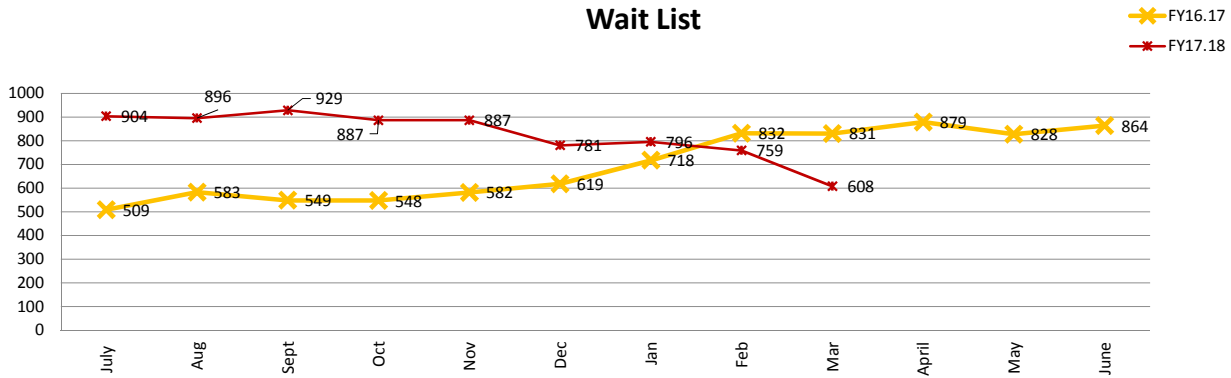
Suggested Business Practices

See the attached management addendum. OEL does not require corrective action for suggested business practices; however, OEL recommends corrective action to improve the coalition’s service delivery.

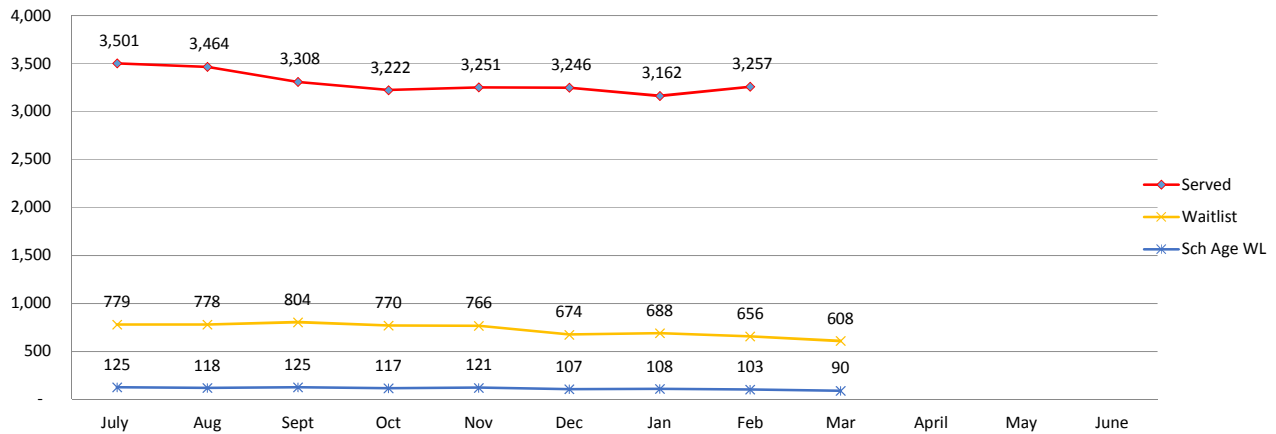
Children Served



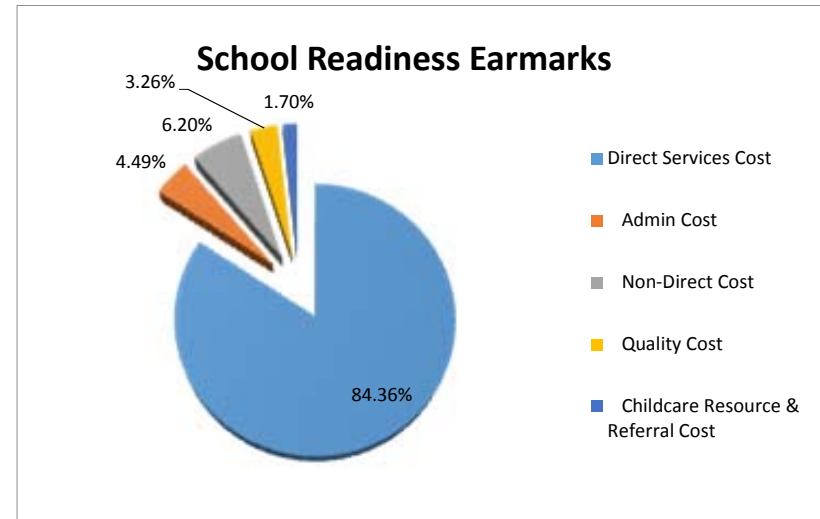
Wait List



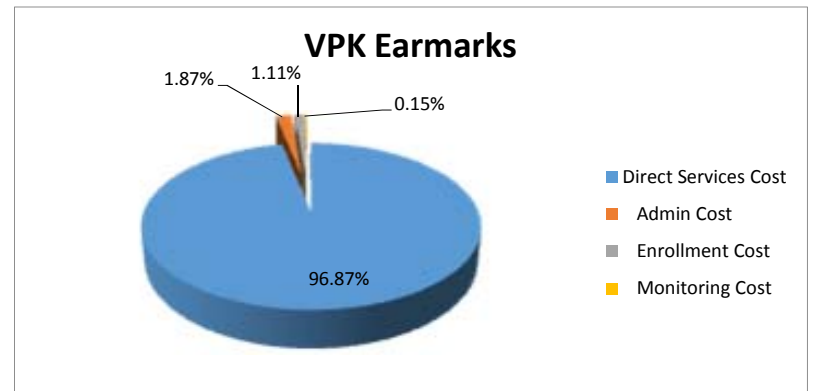
WaitList vs. Served - Current FY



School Readiness				
Category of Spending	FY 17-18 Award	Actual thru 2/28/18	Current %	Earmark/ Restrictions
Award Amount	\$ 18,246,147			
Direct Services Cost	\$ 15,038,979	\$ 9,193,060	84.36%	Minimum 78%
Non-Slot Dollars:				
Admin Cost	\$ 785,706	\$ 489,473	4.49%	Maximum 5%
Non-Direct Cost	1,424,375	675,279	6.20%	
Quality Cost	916,151	354,891	3.26%	Minimum 4%
Childcare Resource & Referral Cost	80,936	184,960	1.70%	(4.57%)
Total Non-Slot Dollars	\$ 3,207,168	\$ 1,704,603	15.64%	Maximum 22%



VPK				
Category of Spending	FY 17-18 Award	Actual thru 2/28/18	Current %	Earmark/ Restrictions
Award Amount	\$ 11,582,978			
Direct Services Cost	\$ 11,142,032	\$ 7,506,900	96.87%	Minimum 96%
Non-Slot Dollars:				
Admin Cost	\$ 248,971	\$ 144,606	1.87%	
Enrollment Cost	180,264	86,196	1.11%	Maximum 4%
Monitoring Cost	12,470	11,871	0.15%	
Total Non-Slot Dollars	\$ 441,705	\$ 242,673	3.13%	



	Budget		
	Total	Thru 2/28/18	Actual
Economically Disadvantaged Direct Svcs	8,213,202	5,475,468	4,344,910
Projected Match	492,792	328,528	260,695
Match Waived	-	-	-
Total Match Requirement	492,792	328,528	260,695
Projected			
Total			
Cash Match Sources			
United Way	262,000	174,667	174,824
CDBG Funders	45,893	1,024	19,698
Other direct match funders	2,500	-	426
Indirect match funders	-	-	-
Cash subtotal	310,393	175,691	194,947
In-kind Match Sources			
Public Education Program	90,147	60,098	48,992
Managed IT Services	15,300	10,200	10,387
Professional Services/Other	500	-	-
InKind subtotal	105,947	70,298	60,379
Total Match	416,340	245,989	255,327
Estimated Match Remaining (Surplus)	76,452	82,539	5,368

EARLY LEARNING COALITION OF BREVARD

Board of Directors Meeting
March 20, 2018



BREVARD PUBLIC SCHOOLS DISCIPLINE POLICY DISCUSSION

Patricia Fontan, Ed.D., Director
ESE Administrative Support

Melissa Catechis, Director
Student Services, Students At Risk



LEGISLATIVE UPDATE

- Federal Budget
 - Passed a budget deal including an increase in the Child Care Development Block Grant (CCDBG) by \$5.8 billion over 2 years
 - Has not yet passed a FY 18 appropriations bill; next step is for Congress to pass a spending bill by March 23
 - Potential that states will receive double the amount of discretionary funding it received in FY 17

LEGISLATIVE UPDATE

- Federal Budget
 - Can supplement, not supplant (watch closely)
 - Discrepancies between this budget and the President's budget proposal released on February 12; spending bill to be tracked as it moves forward
 - Additional School Readiness dollars may arrive quickly and be required to be spent just as fast (but no promises)

LEGISLATIVE UPDATE

State Budget

Flat funding for VPK and School Readiness

6% match requirement to remain (8% proposed)



HB 7055

- Large education bill (page 133 of 207)
- "...if a private prekindergarten provider has been cited for a class I violation, as defined by rule, the coalition may refuse to contract with the provider."
- Same language referencing School Readiness providers

Signed by the Governor



HB 1091/SB 1254

- Largest of this Session's early learning bills
- Amendments along with way
- Still many unknowns:
 - Implementation timeline
 - Much will be clarified during rule development process (publicly noticed)

Next Step: Approval by the Governor

HB 1091/SB 1254

School Readiness Eligibility Revisions

- Revises definition of at-risk child to state "a child in the custody of a parent who is considered a victim of domestic violence and is receiving services through a certified domestic violence center."
- Previously stated that the child had to be residing in the shelter.

HB 1091/SB 1254

School Readiness Eligibility Revisions

- Revises priorities in which School Readiness children are served:
 1. Younger than 13 from a family that includes a parent who is receiving temporary cash assistance (CareerSource)
 2. An at-risk child younger than 9
 3. Subsequent priority shall be given based on the early learning coalition's local priorities

HB 1091/SB 1254

Considerations

- Establishing local priorities requires approval by the ELC Board of Directors
- Which families are most in need that aren't currently a Priority 1 or 2? Special needs children? Teen parents? School age?

HB 1091/SB 1254

Child Assessment

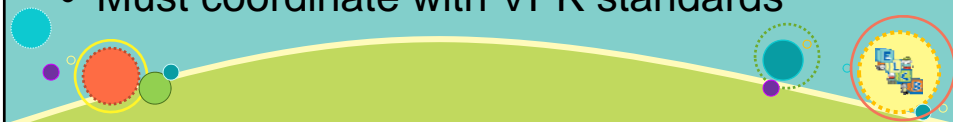
- Requires OEL to “identify observation-based child assessments that are valid, reliable, and developmentally appropriate for use at least three times a year.”
- Must measure across all domains of early childhood development and used for determining developmentally appropriate learning gains.



HB 1091/SB 1254

Child Assessment

- Must provide for appropriate accommodations for children with disabilities and English language learners
- Must be administered by qualified individuals, consistent with the developer's instructions
- Must coordinate with VPK standards



HB 1091/SB 1254

Child Assessment

- At this time, optional to administer
- If do administer and submit valid and reliable data in the domains of language and executive functioning, a payment differential would be provided



HB 1091/SB 1254

Considerations

- Implementation date?
- Procurement process to identify tool(s)
- Staff training needs (initial and ongoing)
- Supports needed to utilize the assessment information in a manner in which it is intended (learning gains/inform instruction)



HB 1091/SB 1254

Program Assessment

- Requires OEL to “adopt a program assessment for school readiness program providers that measures the quality of teacher-child interactions, including emotional and behavioral support, engaged support for learning, classroom organization, and instructional support for children ages birth to 5 years.”

HB 1091/SB 1254

Program Assessment

- The assessment must include:
 - Quality measures, including a minimum threshold for contracting purposes and program improvement through an improvement plan
 - Requirements for program participation, frequency of the assessment and exemptions

HB 1091/SB 1254

Program Assessment

- No later than July 1, 2019, OEL must develop a differential payment program based on the quality measures adopted
- Differential payment (not to exceed 15%)



HB 1091/SB 1254

Program Assessment

- Requires provisions in the provider contract for termination for cause to include “failure to meet the minimum quality measures...for a period of up to 5 years, unless the coalition determines that the provider is essential to meeting capacity needs based on the assessment and the provider has an active improvement plan”



HB 1091/SB 1254

Considerations

- Implementation date of FY 19.20; work to begin prior
- Contracts to be revised (public rule process)
- OEL to procure assessment tool
- Capacity building at ELC
- Provider training and supports

HB 1091/SB 1254

Considerations

- Assessments required before contracting?
- Assistance and follow up?
- Decision of business owners and impact on parent choice and availability of services in the community

HB 1091/SB 1254

Family Portal

- By July 1, 2019, the system shall
 - “allow a parent to monitor the development of his or her child as the child moves along programs within the state.”
 - “enable analysis at the state, regional, and local level to measure growth over time, program impact, and quality improvement and investment decisions.”

HB 1091/SB 1254

Reporting

- OEL to publish annually the number of School Readiness providers who have completed the program assessment, the number who haven't met the minimum threshold and the number of providers that have an active improvement plan based on the results of the program assessment.

HB 1091/SB 1254

Needs Assessment

- Coalitions shall conduct “an assessment of local priorities within the county or multi-county region based on the needs of families and provider capacity using available community data”

