



EARLY LEARNING COALITION OF
BREVARD COUNTY, INC.
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**Board of Directors Meeting
Tuesday, June 25th, 2019 at 2:00 pm**

- I. Call to Order and Pledge of Allegiance
- II. Coalition Roll Call by Self Introduction
- III. Consent Items
 - a. Minutes: May 28th, 2019
 - b. Agency Budget 2019.2020
 - c. Anti-Fraud Policy
- IV. Committee Reports
 - a. Executive/Finance Committee
- V. Director's Report
 - a. Business Leadership Institute video
 - b. United Way Grant
 - c. OEL Grant
 - d. Provider Contracts Certification by June 30th
- VI. New Business
 - a. School Readiness Reconciliation Update
 - b. Grant Reobligation/Deobligation
- VII. Old Business
 - a. EFS Modernization (Portal) Updates
 - b. Melbourne Building Update
- VIII. Public Comment
- IX. Adjourn

Next Meeting: July 16, 2019 (OEL/One Goal Conference conflict)



MINUTES:	Board of Directors Meeting
DATE/TIME:	Tuesday, May 28, 2019 at 3:30 pm
LOCATION:	Early Learning Coalition of Brevard, Conference Room 1018 Florida Ave Rockledge, FL
MEMBERS PRESENT:	Terri Barlow, Alan Bergman, Mark Broms, Robin Buckmaster, Lori Duester, Stephanie Bryant (sub), Khaled Jarrah, Beth Mills, Linda Halpin, Henry Perez, Althea Puzio, and Heather Quidort.
EXCUSED ABSENT MEMBERS:	Victoria Candelora
GUEST/PUBLIC:	Laura Gambino, Gina Sousa, Jessica Beecham, Michell Bhagwandin, Priscilla Ramos, Lisa Diggs, Tina Snyder and Cathie Odom.
START TIME:	Alan Bergman called the meeting to order and quorum was established at 3:10 p.m. Pledge of allegiance took place and introductions were conducted.

AGENDA ITEM	SUMMARY/DISCUSSION	ACTION/FOLLOW-UP
Consent Items	a. Minutes: April 16, 2019	Terri Barlow motioned for the Consent Items to be approved. Henry Perez seconded the motion. The motion passed unanimously by all Board members.
Committee Reports	<p><u>Executive/Finance Committee:</u> Alan Bergman reported to the Board the Executive/Finance Committee met on Tuesday, May 22, 2019. The agenda items included:</p> <ul style="list-style-type: none"> - VPK Payment Reconciliation - Actual Agency Budget - Sliding Fee Scale Model 7.1.2019 - Melbourne Building Update - Portal Update - Waiting list status - Update on AELC and OEL ED Meeting - Provider Bonus – Work in Progress <p>ELC has applied for Grant 3.2 million deadline: July 31, 2019.</p>	No Action/Follow-up
New Business	<p>a. <u>Executive Director Announcement:</u> Alan Bergman welcome new Executive Director, Laura Gambino and encouraged board members to meet and get to know Laura. Mark Broms thanked the team involved in the hiring process, it was a great experience. We met with great applicants and was not an easy decision. Laura took the opportunity thanked everyone, and agreed the process was great, enjoyed meeting ELC staff/ board members and is looking forward to working with everyone.</p> <p>b. <u>School Readiness Reconciliation Update:</u> Cathie presented and currently processing SR payments and reconciliation it has not been an easy process. Providers are still paid by estimates. The challenge is getting it completed by the end of July. Cathie mentioned we had changed our process 2 month ago. Approximately 400 school age children rate</p>	<p>No Action/Follow-up</p> <p>No Action/Follow-up</p>

	<p>amount are incorrect once we have the data fixed it will give the provider an opportunity to resend.</p> <p>c. Agency Budget 18.19: Cathie reviewed and provided handout (<i>see attached</i>) with the changes to the board, more funds for SR assessments increase in SR Grant. It was more also due to restitution funds that been paid by clients. OEL pays back to Coalition and all funds are allocated back to Direct Services. PFP Grant Award decrease in the original budgeted for 35 and currently funding 25 providers. No changes were made in VPK. We received a small amount in-kind and I went ahead increase the budget. Cathie explained a lot of the expenses with the additional funds are open positions, Melbourne rent, Quality dollars and have those funds in to Direct Services.</p> <p>d. 2019 Sliding Fee Scale Model 7.1.2019: Cathie explains each year the sliding fee schedule gets distributed by OEL. Poverty Level has gone up and board approval is needed to implement the changes beginning July 1, 2019 to reflect the new poverty level to follow federal guidelines.</p>	<p>Mark Broms approved Agency Budget Revise #2. Lori Duester seconded the motion. The motion passed unanimously by all Board members.</p> <p>Beth Mills approved Sliding Fee Scale Model 7.1.2019. Althea Puzio seconded the motion. The motion passed unanimously by all Board members.</p>
Old Business	<p>a. EFS Modernization (Portal) Updates: Gina mentioned portal is moving forward very slowly. ELC sent two staff to work with developers to work on tickets from July 2018 to current. There are no issues with new clients. Migration information has the issues and data is incorrect.</p> <p>b. OEL: AELC Executive Director's talked why is has not reached the media. They are doing the best they can with the staff and next step is to actually go the Governor or media. Gina will provide articles that she has received in regards to the funding and believes is the incorrect way in bringing in attention about budgets and funds. The local match that we receive CDBG always 6%, CCEP is 50% business owner. It has been said is no longer 6% and is 50/50. Discussed ways of reaching out to businesses and promoting CCEP, speaking out to the chambers. In addition, other coalitions has staff grant writers.</p> <p>c. Finance Report: Cathie presented the earmarks reports based on our estimated reports. April VPK Admin 2.81% next month VPK should be true numbers and able to upload VPK attendance. Thus far VPK appears to be working. SR dollar amount direct services based on estimated amount percentage. Good news is based on our estimated amounts our admin cost is 3.79% an overall 12%. (<i>see handout</i>)</p> <p>d. Melbourne Building Update: Cathie mentioned the roof and windows are up in the new building and projecting grand opening August or September 2019.</p>	No Action/Follow-up
Public Comment/Board Announcements	<p>Cathie asked board members if we could re-schedule board meeting to Tuesday, July 25, 2019 due to a conflict.</p> <p>Beth asked about the release of VPK Readiness rates, ELAC took them to represent all ELC's. Growth Rule, ED Commissioners Readiness rates.</p>	<p>Henry Perez motioned for next meeting June 25, 2019. Althea Puzio seconded the motion. The motion passed unanimously by all Board members.</p>
Adjournment	The meeting was adjourned at 4:59 p.m.	Althea Puzio motioned for the

Early Learning Coalition of Brevard County
Agency Budget 19.20

6/19/2019

	FY18.19 Budget	FY19.20 Budget	Change %
<u>Revenue:</u>			
Office Of Early Learning			
School Readiness Grant Award	20,013,858	20,707,271	3.46%
Performance Funding Project (PFP) Grant Award	498,448	335,044	-32.78%
VPK Grant Award	11,530,805	11,360,216	-1.48%
VPK Outreach & Awareness Grant Award	23,348	23,348	0.00%
United Way (all sources)	262,000	268,000	2.29%
Child Care Executive Partnerships Partners	91,386	-	-100.00%
In-kind Revenue	59,284	42,000	-29.15%
Contributions/Match (includes CDBG funding)	71,621	55,500	-22.51%
Match Raising Events	2,500	2,500	0.00%
Total Revenue:	32,553,250	32,793,879	0.74%
<u>Expenses:</u>			
SR Direct Services (Child Care Slots - all funders/match OEL - 81.97%)	16,845,815	17,161,713	1.88%
VPK Direct Services	11,091,395	10,928,528	-1.47%
ELC Operations	3,097,695	2,970,768.09	-4.10%
ELC Quality Initiatives	742,444	937,827	26.32%
ELC Quality Initiatives - PFP, Stipends, Training	775,901	795,044	2.47%
Total Expenses:	32,553,250	32,793,879	0.74%
Net Income/(Deficit)	(0)	-	



Anti-Fraud Plan

The Early Learning Coalition of Brevard (ELC) has adopted an anti-fraud plan with that emphasis on the attempt to recover State, Federal and Local Matching Funds which were paid as an intentional act of deception, omission or misrepresentation in accordance with Florida Statutes 1002.91 and Rule 6M-9.400. The adopted anti-fraud plan has a three tiered offense approach (Chart I):

- Submitting fraudulent information during initial application
- Graduated phase out non-intentional acts
- Intentional acts of fraud

All ELC employees are responsible in reporting suspected fraud by any person, provider or coalition member (staff, volunteer, board member etc.) (Exhibit I). The Primary Anti-Fraud Contact is Gina Sousa, Director of Program Initiatives, 321-637-1800 x 2061 per Rule 6M-9.400 (3) (a). When ELC employees become aware of instances of actual, potential or suspected fraud and abuse by a recipient of School Readiness (SR) or Voluntary Prekindergarten (VPK) Education Program benefits, they are mandated to investigate the act in accordance with the Suspected Fraud Programs procedure (Exhibit II). In addition, repayment agreements, if necessary, will be made in accordance with the Suspected Fraud and Repayment Agreement Reporting procedure and Improper Payments policy (Exhibit III & Exhibit IV). Furthermore, staff follow procedures to ensure verification of child care referrals from other organizations and services must be provided and not terminated under a valid referral regardless of prior or suspected fraudulent activities.

The ELC does not have a fraud hotline; however public assistance fraud flyers are posted in meeting spaces, anonymous telephone calls are accepted and researched and potential fraud penalties are discussed with recipients when their rights and responsibilities are explained (Exhibit V).

Designated ELC employees are trained at a minimum annually in client fraud prevention practices to recognize "red flags" such as questionable documentation, inconsistent paperwork or statements, quality interviewing, and how to detect possible fraudulent acts as related to FS 1002.91 (8)(b)(d). The Coalition uses the following tools and resources in detecting, preventing fraud, abuse and overpayment:

- Data quality reports generated from the Office of Early Learning (OEL)
- Referral verification from partnering organizations (Exhibit VI)
- Office of Early Learning Fraud Overview
- Locally developed flyers posted throughout the organization and discussed during interviews with clients
- Developing and supporting relationships with partners and other local organizations (DCF, CareerSource, BrevardCares, Clerk of Courts, etc.)
- Validation of referrals with partnering organizations
- Processing monthly reports between OEL and the Coalition
- Internal File reviews
- Post Attendance Monitoring and Payment Validation Reviews.

Furthermore, the Coalition completes an annual self-assessment using OEL's Internal Control Questionnaire. Policies and procedures are also reviewed on an annual basis to ensure compliance with statute, rule and other guidance.

The following list represents "red flag" items but is not inclusive to other fraudulent acts or identifiers:

- Numerous documentation errors
- Conflicting information and documents
- Missing information on documents
- Pay stubs with markups or white out
- Employers paystubs that are commonly produced and appear different or altered
- Only photo copies available with no originals
- Inconsistency in submitted documents from each interview
- False employment verification or fictitious employers
- Misrepresentation of household size or income
- Illegible, forged, inconsistent, or varying signatures
- Inconsistent statements and vague responses
- Denying access to information
- Attendance irregularities and/or inconsistent attendance information
- Giving false statements
- Producing false documents

If a recipient of SR or VPK benefits is found to be in violation of program guidelines they are informed of their termination of benefits via a Notice to Discontinue Services Form completed by the ELC Staff (Exhibit VII). On the reverse side of that form is the Right to Appeal which includes a statement of with includes instructions of how the recipient may obtain a copy of their file for review. The form will be translated into the recipient's native language if prior Coalition communications were translated. A copy of the Confidential Information Record Request Form and corresponding External Records Requests is provided to the recipient (Exhibit VIII & Exhibit IX). If a waitlist applicant is found in violation of submitting fraudulent information prior to receiving services they will receive a Notice of Ineligibility and may reapply to the waitlist when eligible (Exhibit X).

If the recipient or applicant is able to provide necessary documentation to resolve the issue within the designated time period, services will be reinstated. If unable to provide the necessary documentation to overturn decision, the applicant will need to reapply to the waitlist.

If the recipient is unable to resolve the issue through the preliminary appeal process and believes the conclusion of fraud was made in error, then he or she may file a formal written appeal for review by the executive director (ED) or the Coalition board of directors designated executive staff person (ESP).

A summary of the formal written appeal process is listed below:

Written Appeals Summary (Exhibit XI)

1. A written appeal must be submitted to the ED or ESP. The appeal must fully describe the nature of the error the recipient believes has been made with supporting documentation.
2. The appeal shall be postmarked, faxed, emailed or hand delivered before the date of the discontinuation/suspension of services. Failure to file a timely appeal waives the right of appeal.
3. If a timely appeal is filed, the recipient will not be suspended or terminated from the program until the written decision of the ED or ESP or the original date of the discontinuation/suspension of services, whichever is later.
4. The ED or ESP must respond to the recipient in writing within thirty (30) days of receiving the appeal with a decision as to whether the suspension or termination will be upheld or modified.
5. The recipient who wishes to appeal the decision of the ED or ESP may request further review by an appeals committee in accordance with subsection (e) of 6M-9.400. The request must be submitted to the Coalition in writing within ten (10) calendar days of the date of the ED/ESP written response.
6. Steps for review by the appeals committee are listed below:
 - a. The recipient is given the opportunity to present their position during a scheduled appeals committee meeting. The recipient will be notified of the scheduled date and informed this is a public meeting and any information presented may be used by other state agencies.
 - b. The appeals committee is selected by the Chairman of the Board and a chair named.
 - c. The appeals committee will meet within forty-five (45) calendar days of receipt of the recipient's appeal.
 - d. The recipient has up to thirty (30) minutes to present their appeal and any information they wish the committee to consider.
 - e. Coalition staff excluding the ED or ESP (whichever made the initial decision) shall be available to provide any information requested by the committee.
 - f. The appeals committee will consider all statements, review all documents and may request additional evidence or information if necessary to make a decision. The final determination letter will be suspended for the length of time given to provide the additional information.
 - g. An appeals committee selected staff member, excluding the ED or ESP, will take minutes of the event and final determination of the appeal.
 - h. The appellant will be notified in writing of the final determination within ten (10) days of the appeals committee meeting.
 - i. The appeals committee determination is final.

Act of Abuse of Overpayment (Chart I)

Program Violations	Penalty
Submitting fraudulent information during initial application process	Client did not receive services. Client may reapply to waitlist when eligible.
During graduated phase-out a non-intentional act which affected the copayment the client is responsible to pay. Examples may include but are not limited to: non-reporting of survivor benefits, child support, second job, salary increase, etc.	If greater than \$700, client remains in services with an overpayment agreement implemented. <i>Send Repayment Request letter allowing 14 additional days of services to complete. If no response from client in 14 days, send 14 day notice to discontinue services</i>
Intentional act which resulted in an overpayment that affected the eligibility and submitted fraudulent/altered documents during reauthorization or eligibility segment that may not have caused an overpayment to case. Examples may include but are not limited to: Not meeting POC for more than 3 months, Over income (85% SMI), Questionable Household composition, etc.	Client is terminated, overpayment agreement implemented, and/or submitted to OEL Fraud Referral System. Reapplying to the waitlist is subject overpayment status. Must pay back prior to placing on waiting list. <i><\$700: Eligibility Terminated, May reapply on Waitlist.</i> <i>>\$700 <\$2,000: Eligibility Terminated, OP agreement implemented, After paid in full can reapply to Waitlist.</i> <i>>\$2,000 Eligibility Terminated, Refer to DPAF, cannot apply on Waitlist until response from DPAF</i>

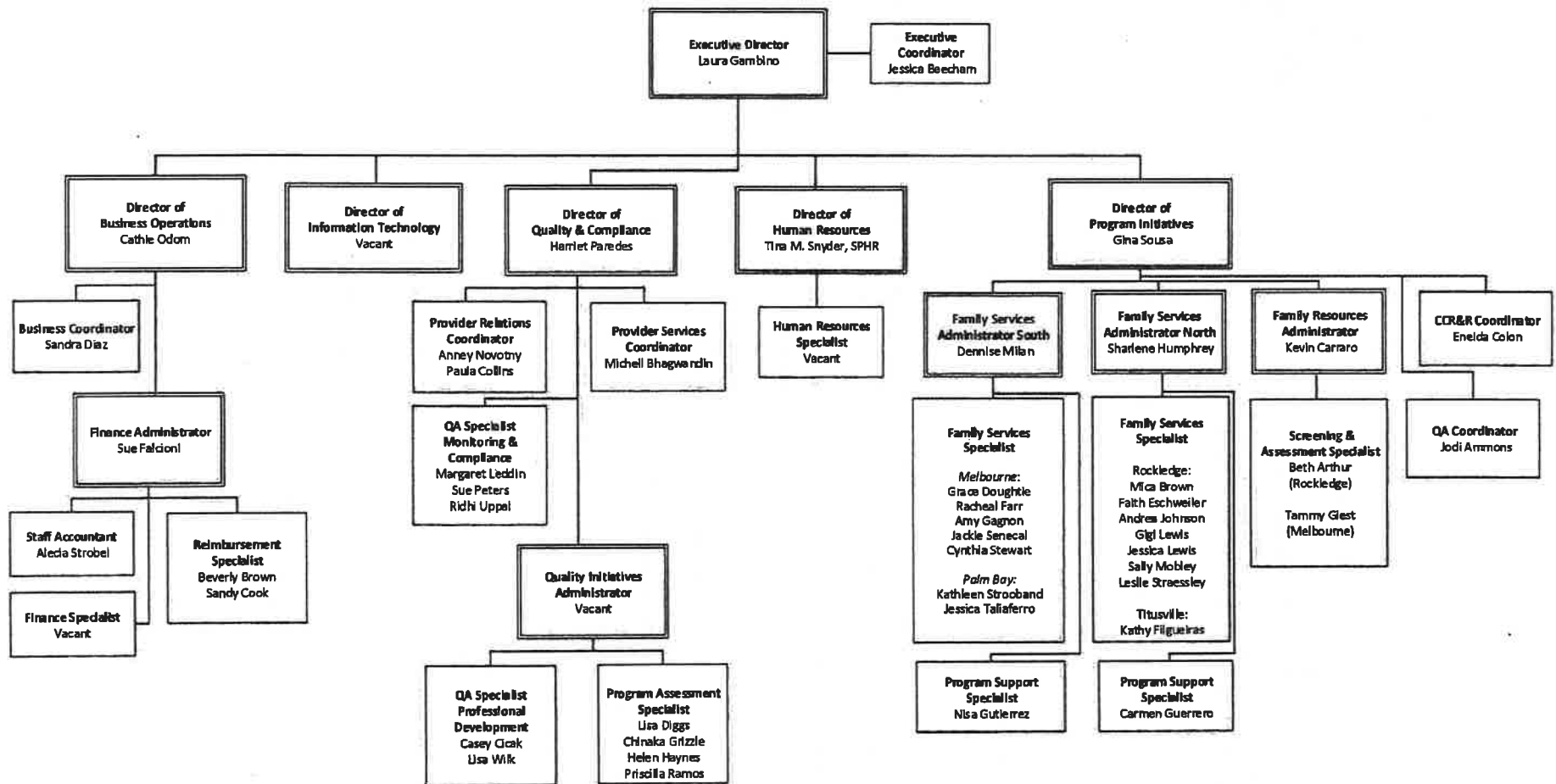
At-risk referral recipients shall not be suspended or terminated if a valid referral is in place.

The Coalition Administrator for the OEL Fraud Referral system will submit an electronic report monthly reporting the parents and providers terminated from services as a result of fraud, per Rule 6M-9.400 (3)(b) and ELCB-FS-0001-12 and ELCB-FM-0002-09.


The Coalition Administrator is Cathie Odom, Director of Finance, 321-637-1800 x 2012 per rule 6M-9.400 (3)(c).

**Early Learning Coalition of Brevard County, Inc.
Organizational Chart**

Updated 05/29/19



Our Core Values
Accountability ~ Excellence in Service ~ Integrity ~ Stewardship

Early Learning Coalition of Brevard County, Inc. Procedure		
Issue Date: 09/13/12		
Corresponding Policy: ELCB-FS-0001-12		
Subject: Suspected Fraud		
Originating Department: Family Services		
Revision Date(s): 10/21/2014, 5/7/2015		
Date Approved by Executive Director: 7/22/15		

Subject: Suspected Fraud in the Early Learning Programs

References: 45CFR98, Code of Federal Regulations; Chapters 1002.51-79 and 1002.81-97 Florida Statute; Rules 6M-4 and 8, Florida Administrative Code.

Corresponding Policy (s): ELCB-FS-0001-12

Definitions:

Client shall mean the parent, family member, or guardian that is the recipient of services for their child (ren) enrolled in an Early Learning Program.

Early Learning Programs shall mean any program funded with local, state, and/or federal funds administered by the Coalition; the primary programs are School Readiness and Voluntary Prekindergarten.

Data quality reports shall mean Office of Early Learning (OEL) reports designed to identify potential errors related to children and providers participating in Early Learning Programs.

Suspected fraud and/or misrepresentation shall mean an intentional deception, omission, or misrepresentation made by a person with knowledge that the deception, omission, or misrepresentation may result in unauthorized benefit to that person or another person, or any aiding and abetting of the commission of such an act. The term includes any act that constitutes fraud under applicable federal or state law.

Examples of suspected fraud or misrepresentation

1. Providing false or misleading information or withholding information in order to participate in or receive payments under the Early Learning Programs.
2. Failing to disclose a change in circumstances or material information that could directly impact eligibility decisions.
3. Falsifying records or documents.
4. Assisting or aiding any person in committing any of the above acts.

Procedure: ELC staff is trained at a minimum annually on how to detect and prevent fraud, abuse, and overpayment. Fraud is also a standing agenda item for the ELC Board of Directors.

Client fraud prevention techniques include but are not limited to:

1. Review previous interview screens – look for inconsistent paperwork or statements regarding household composition, employment, residency, etc.
2. Check employment information paid by personal check or cash. Document name of person verifying information and double check during redetermination periods.
3. Ask additional questions if questionable documentation received. If documentation unclear services are not reauthorized or authorized for three months with follow up.
4. Review rights and responsibilities with the client and stress the importance of reporting changes within 10 calendar days.
5. Research data quality reports every month and train on irregularities.


When ELC staff becomes aware of instances of actual, potential or suspected fraud and abuse in the operation of the Early Learning Programs, whether identified internally or reported to us, the following steps shall be taken:

1. Preliminary Investigation: Conduct a preliminary investigation to determine the likelihood a fraudulent act has been committed. Such preliminary investigations may include, but need not be limited to: conducting in person interviews, making telephone calls to related parties, researching Clerk of Courts – recent cases, Clerk of Courts – official records and Social Network sites, and/or conduct an attendance monitoring.
2. Refer to the Act of Abuse or Overpayment (Chart I) to determine program violation level, occurrence and penalty.
3. Depending on the occurrence level, the specialist will follow the penalty structure and notify the client accordingly. Notification will vary from a letter noting the offense to immediate termination and submission of a Suspected Fraud Referral Record Form to the Department of Financial Services (DFS).
4. For offenses requiring restitution of overpaid benefits, a repayment agreement will be instituted in accordance with ELCB-FM-0002-09 Improper Payment policy. In the event a referral is received for child care under protective services or TANF the Coalition will contact the referring agency to verify. Services must be provided under a valid referral regardless of prior fraudulent activities.
5. For offenses requiring submission to DFS, the specialist will complete the Suspected Fraud Referral Record Form and submit to the ED or designee within 3-5 business days. A brief written summary of the situation must be documented on the Suspected Fraud Referral form by the individual reporting the case, identifying the details of the applicant/client or providers' case. The following must be cited:
 - a) What information the individual provided or failed to provide, which impacts their eligibility for services or reimbursement
 - b) The issues of concern and any available evidence such as a falsified application, attendance record or other documentation.
 - c) The summary should provide factual information, specify dates and address questions of "Who, What, When, Where and How".
 - d) If incorrect payment has occurred, the extent, duration and amount of the incorrect payment must be clarified.

Upon signature of the Suspected Fraud Referral Record Form the information is entered into the Investigation Log by Levels spreadsheet, reviewed by Cathie Odom, Director of Business Operations (321) 637-1800 ext. 2010 then data entered into the OEL Fraud Referral System (FRS) per the OEL – FRS guide.

In addition, the case may be referred to Office of Early Learning to the Department of Financial Services, Public Assistance Fraud Unit (DFS) for further processing.

For offenses that do not rise to the level of submission to DFS, the Coalition institutes a repayment agreement corresponding to the penalty structure in Chart I and in accordance with the Suspected Fraud and Repayment Agreement Reporting procedure and ELCB-FM-0002-09 Improper Payments policy.

	Early Learning Coalition of Brevard County, Inc. Policy
	Issue Date: October 16, 2012
	Policy Number: ELCB-FS-0002-12
	Subject: Dispute and Appeals Policy
	Originating Department: Family Services
	Revision Date(s): October 21, 2014
	Date Approved by Board of Directors: NA

Subject: Dispute and Appeals Policy

Purpose: To ensure a systematic process is established to manage disputes and appeals in a professional, timely, and compliant manner.

Background:

References: Chapter 1002.91 Florida Statute, Rule 6M-9.400 and Early Learning Coalition of Brevard Rights and Responsibilities

Definitions:

Coalition: Early Learning Coalition of Brevard County, Inc.

Recipient: Parent or legal guardian whose child was determined eligible for School Readiness or Voluntary Prekindergarten Education Program Benefits

Policy: All related disputes or disagreements regarding decisions made by the Coalition must be submitted in writing. The Coalition agrees to respond to the appeal within 30 days of receiving the appeal with a decision as to whether the suspension or termination of benefits will be upheld or modified.

If the recipient does not agree to the proposed method for resolution they may appeal the decision before an appeals committee selected by the Chairman of the Board of the Coalition. The recipient will present their position for the appeals committee to consider. The recipient will be notified in writing of the appeals committee determination within ten days of the meeting.

The determination of the appeals committee is final.



Early Learning Coalition of Brevard County, Inc.
Policy Number: ELCB-FM-0002-09
Department: Finance Department
Staff Contact: Director of Business Operations
Date Approved: 04/01/09
Date Last Modified: 10/15/2014

Subject: Improper Payments

Background: 45CFR98, Code of Federal Regulations; Chapters 1002.81-97, Florida Statute; Rules 6M-4 , 8, and 9, Florida Administrative Code; OEL Policy OEL-PI-0003-12.

Policy:

It is the policy of the Early Learning Coalition of Brevard County, Inc. to ensure a system of accountability for fiduciary responsibility of proper distribution of Federal and State funds and establishes the process of handling improper payments.

Procedure:

A. General

1. The Coalition is responsible for ensuring fiduciary diligence in the implementation of the rules and regulations of the School Readiness and Voluntary Pre-Kindergarten (VPK) programs, and to seek repayment when payment and/or benefits have been provided improperly.
2. Any contractor, provider or client of School Readiness or VPK services, that receives State or Federal funds or benefits from the Coalition, are obligated to repay the funds for various reasons, including, but not limited to:
 - Overpayment
 - Payment made in error as a result of a lack of understanding or miscommunication by any party
 - Disallowed payment due to ineligibility of the client or provider
 - Disallowed payment as a result of an audit
 - Disallowed payment as a result of non-compliance
 - Reconciliation of a payment for the VPK or SR program
 - Disallowed payment based on misrepresentation or fraud
 - Interest earned on advanced funds
 - Unexpended funds that remain at the end of the fiscal year
3. In all cases, the Coalition has the discretion to refuse any applicant, client or provider, any future participation in the VPK or School Readiness programs for fraudulent activity, non-compliance with requirements, lack of cooperation, failure to comply with rules, requirements or responsibilities of the School Readiness and/or VPK programs.
4. In all cases, it is the Coalition's responsibility to document and keep current information that reflects the status of any client or provider activity related to this policy.

B. Incorrect Payments

1. Recoupment of incorrect payments such as those cited above must be sought regardless of errors or misrepresentation on the part of the client, provider, or Coalition. Once an incorrect expenditure has been identified by the Coalition, the following activities should occur:
 - The Coalition must notify the provider of the incorrect payment and the reasons that caused the incorrect payment. Written confirmation must be sent to the provider confirming the amount of incorrect payment and what action is to be taken for recoupment.

- a. The written confirmation will be sent by regular U.S. mail and if no response, by certified mail, return receipt requested.
 - b. A copy of the letter must also be placed in the provider's file, maintained by the Coalition's Finance Department.
 - If the provider is continuing to provide care of children, then recoupment will occur by deducting the amount of the incorrect payment (known as "prior period adjustment") from the funds currently paid to the provider.
 - If the provider is not continuing to provide care to School Readiness or VPK children, then the recoupment must be secured directly from the provider unless the incorrect payment was due to misrepresentation or fraud on the part of the client.
 - The client will be responsible for repayment of funding to the Coalition if the cause of the incorrect payment was based on a client's failure to provide information that directly affected their eligibility for services will be terminated or suspended in accordance with the Exhibit I (Act of Abuse or Overpayment Matrix) of the Coalition's Anti-fraud plan.
2. The Coalition is responsible for making diligent efforts to secure timely reimbursement for incorrect payments or ineligible services.
- If the sum of money owed is such that the responsible party cannot immediately repay, then the Coalition will develop with the responsible party, a written repayment schedule in accordance with Exhibit I (Act of Abuse or Overpayment Matrix) of the Coalition's Anti-Fraud Plan.
 - The repayment schedule may allow for partial payments, but each responsible party is expected to repay the full amount within the required period.
 - During the period covered in the repayment plan, the Coalition's Director of Business Operations or designee must monitor the repayment plan to ensure it is being followed and all documents must be filed accordingly.
3. Errors resulting in incorrect payments are ultimately the financial responsibility of the Coalition if recoupment proves unsuccessful.
4. Designated cases, where there is evidence to support a belief that the activity of the client, as indicated in Exhibit I (Act of Abuse or Overpayment Matrix) of the Coalition's Anti-Fraud Plan, or provider was fraudulent and certain amount thresholds are met, must be submitted to the Office of Early Learning via its Fraud Report System and subsequently the Division of Public Assistance Fraud, Department of Financial Services (DFS) for further evaluation and/or processing.

C. Delinquent Collection of Repayment

1. The status of repayment becomes delinquent when the provider/client fails to repay the full amount that the provider/client owes by the repayment date specified in a Court's Restitution Order. Notice of delinquency will be sent to the designated Probation Officer.
2. If, the Coalition entered into a repayment schedule, the account becomes delinquent when the provider/client fails to submit the partial payment specified in the repayment schedule, or repay the account in full within six months after the repayment date specified in the repayment schedule.
3. Once an account becomes delinquent, the Coalition will within ten days, send a demand letter by regular U.S. mail with delivery confirmation. The first demand letter will include the following:
 - Full amount owed;
 - Reason for the delinquency;
 - Demand for immediate repayment of the full amount within 30 calendar days of the demand letter;
 - Description of the collection efforts that the Coalition will use if the provider/client fails to repay;
 - Provider/client's right to dispute the delinquent account by submitting a written dispute to the Coalition within 14 days after issuance of the demand letter
4. If the provider/client fails to make payment within the time period specified in the first demand letter, a second and final demand letter will be sent within ten days by certified, return receipt requested, regular U.S. Postal Service. The second demand letter will include:
 - Full amount owed;
 - Reason for the delinquency;
 - Demand for immediate repayment of the full amount within ten calendar days;
 - Provider/client's right to dispute the delinquent account by submitting a written dispute to the Coalition within 30 days after issuance of the previously sent first demand letter;
 - Notice that the client or provider will not receive further state or federal funds unless full payment is made;
 - Notice that the Office of Early learning may report a delinquent account for collection by DFS if the provider/client fails to repay the account in full by the date required in the second demand letter.

A SERIOUS CRIME:

Public Assistance Fraud


It is important to give all information and tell the truth when applying for services through your local Early Learning Coalition. Under Florida Law, you must give your Specialist all the information needed to decide the amount of assistance you are eligible to receive. Those who do not report correctly **COMMIT A CRIME**, that can result in termination of services, reimbursement of improperly received benefits and investigation by Florida Department of Financial Services.

PROTECT YOURSELF!

- Be sure to tell your Specialist everything he/she needs to know in order to decide the level of assistance you are eligible to receive.
 - Did you report?
 - All household members including:
 - Child's other parent, spouse, other children or relatives, friends, etc.
 - All income including:
 - Full-time job
 - Part-time job
 - Unemployment
 - Child Support
- If you are not sure about what you told your Specialist in the past, **ASK** or call immediately.
- When your Specialist asks you a question, tell the whole story and be honest with your answer.
- **REPORT ANY CHANGES** about you or any member of your household to your Specialist immediately!



SERIOUS CRIME

Early Learning Coalition of Brevard County, Inc. Procedure	
Issue Date: 3/21/14	
Corresponding Policy: ELCB-SR-0002-08	
Subject: Partnering Agency Referrals for School Readiness Services Procedure	
Originating Department:	
Revision Date(s): 10/1/2008; 02/01/2010; 09/14/2011; 11/01/2012; 3/21/14, 10/9/14; 11/23/15	
Date Approved by Executive Director: 11/23/15	

Subject: Partnering Agency Referrals for School Readiness Services Procedure

References: Office of Early Learning School Readiness Standard Eligibility Review Program Guide; Rule 6M-4.200, F.A.C.; Chapter 1002.81-97 Florida Statute

Corresponding Policy (s): Partnering Agency Referrals for School Readiness Services Policy

Definitions:

At-risk child - Includes the following children that the Department of Children and Families (DCF) refers for SR services:

- A child from a family that DCF or a designated sheriff's office is investigating for child abuse, neglect, abandonment or exploitation.
- A child who is in a diversion program that DCF or its contracted provider runs and who is from a family that is actively participating in and complying with department-prescribed activities, including education, health services or work.
- A child from a family under DCF or a contracted service provider's supervision for abuse, neglect, abandonment or exploitation.
- A child placed in court-ordered, long-term custody or under the guardianship of a relative or non-relative after DCF or its licensed contractor terminated parental custody.
- A child in the custody of a parent who is a victim of domestic violence and is residing in a certified domestic violence center.
- A child in the custody of a parent who a DCF-certified homeless shelter verifies as homeless.

Child Care Application and Authorization forms: referral received from the local CareerSource, Department of Children and Families and contracted community-based providers, which contains all

required information and signatures of the parent, referring agency representative and authorizing coalition worker.

TCA- Temporary Cash Assistance – recipients of TANF (temporary aid to needy families) subject to Federal work requirements

TCC- Transitional child care for families transitioning off TANF to work

Procedure:

- I. All referral forms received from the Department of Children and Families or partnering agencies will be reviewed to ensure the referral indicates the following:
 - a. The name and contact information of the agency/case worker making the referral.
 - b. A current 'authorized child care begin and end date' listed for the selected review period.
 - c. The name of the child (ren) authorized for eligibility.
 - d. The dates of birth for the child (ren).
 - e. The name and address of parent(s).
 - f. The eligibility for referral, which includes status, such as assistance, non-assistance, RCG, TCA, TCC, At-Risk-PI, -PS, -FS, In-Home, Out-of-Home, Medicaid Eligible, Custody home, Medicaid eligible, custody, etc.
 - g. A purpose for care; such as protection, employment, work activity or education.
 - h. The number of hours authorized or identified as full-time, part-time or both.
 - i. Transitional child care (TCC) referrals must also include the TCC period.
 - j. A signature and date for the authorizing agency representative or supervisor, parent and coalition representative.
- II. Electronic child care referrals are acceptable. However, they are required to be transmitted via a secure server.
- III. If dates or required items are missing, designated staff will request a new referral or contact the referring case worker and make an electronic post-it change on the referral. Any changes should be signed and dated by the coalition representative and include the date, time and name of authorizing case worker. It would be recommended to have documentation of the change (email or fax). The coalition should document attempts to obtain information missing on referrals; two documented attempts would typically represent due diligence.
 - a. Note: For clients under Protective Services (PS) or Protective Investigation (PI), Florida's Office of Early Learning expects the safety of these children is a priority. Services should not be denied due to an administrative error on the child care referral or if the child care authorization date is prior to the signature date of the referring agency. Coalition staff should work with the referring agency to make the needed corrections for any administrative error.

- IV. Designated staff and/or eligibility staff will determine the correct child care authorized begin and end dates are based on the category of care(billing group) requested:
 - a. At-risk – In-home (BG1-11), out of home (BG1-14R) and foster care (BG1-13) referrals may have an authorization period up to six (6) months. A new referral must be received for each six-month period.
 - b. At-risk – Diversion (BG1-11D) referrals may have an authorization period up to 60 days. The agency may renew the referral in 60 day increments, not to exceed six months total. A new referral must be received for each 60 day period.
 - c. At-risk – Homeless (BG1-HOME) referrals may have an authorization period up to six (6) months. A new referral must be received for each six month period.
 - d. At-risk – Domestic Violence (BG1-FAM) referrals may have an authorization period up to three (3) months. A new referral must be received for each three (3) month period.
 - e. At-risk – Protective Investigation in home (BG1-IN) and out of home (BG1-OUT) referrals may have an authorization date up to 60 days. The agency may renew the referral in 60 day increments, not to exceed six (6) months. A new referral must be received with each 60 day period.
 - f. TCA Recipient not working (BG3-TCAN) and working (BG3-TCAW) referrals authorization period is based on the local CareerSource service's operating procedures. Typically the authorization period is up to three (3) to six (6) months.
 - g. TCC Recipient (BG5-TCC) referrals may have an authorization period up to 24 months. A redetermination of eligibility must be completed at minimum annually.
 - i. The authorization begin date must begin on the first day of the month (first month no longer receiving TANF) and end on the last day of the 24th month following the begin date.
 - h. TCA Respite Services (WRC-RC1) referrals may have an authorization period up to 60 days. The referral must not exceed 60 days.
- V. Designated staff will make two (2) attempts to contact the parent/guardian and initiate the enrollment process and provide Child Care Resource & Referral services within 10 days from receipt of the referral.
 - a. Designated staff saves each incoming referral electronically and indicates the date the referral is received.
 - i. The authorization begin date and the referring worker's signature date must be within 10 calendar days from receipt of the referral.
 - ii. Eligibility must be determined within 10 calendar days from receipt of the referral.
 - iii. Eligibility cannot be established prior to the authorization begin date on the referral.
- VI. If the referral cannot be processed within the 10 calendar days designated staff will notify the referring worker via email.



NOTICE TO DISCONTINUE SERVICES

Exhibit VII

Parent/Guardian Name: _____

Date: _____

Child (ren) Names: _____

Your last day of Child Care Services will be _____ for the following reason(s):

- ☐ Income exceeds 200% of the Federal Poverty Level or exceeds 85% State Median Income
- ☐ Parent (s)/guardian (s) no longer meet the work/education/training hour requirement
- ☐ Children no longer attending authorized child care
- ☐ Child exceeds age limit for services
- ☐ Temporary disability / maternity leave time has expired
- ☐ Suspended care time has expired
- ☐ Transfer of Guardianship
- ☐ Moved out of county
- ☐ Failed to provide proof of child citizenship / qualified resident alien status
- ☐ Child never enrolled / child care provider not chosen
- ☐ Care no longer needed (parent / guardian available to care for child)
- ☐ Client failed to provide required documentation previously requested by specialist
- ☐ Client did not meet program requirements during last reauthorization period
- ☐ Other _____

Estimated repayment of improper benefits received if conclusion of overpayment is upheld,
\$_____ including any benefits received after the receipt of this notice.

Estimated length of time benefits will be suspended or terminated _____

A copy or review of your file may be obtained by completing the Confidential Information Exempt Record Request form and returning it to the main office located at 1018 S. Florida Avenue in Rockledge, Florida. A photo ID is required to complete the request. Call our office for additional information.

Family Services Specialist Signature

*SEE REVERSE FOR APPEAL INFORMATION

Date

EARLY LEARNING COALITION of Brevard County, Inc.
Rockledge Office PO Box 560692, Rockledge, FL 32956 Phone: 321-637-1800 Fax: 321-637-1897
Melbourne Office 2080 W Eau Gallie Blvd, Ste A, FL 32935 Phone: 321-752-3290 Fax: 321-752-3294

Revised 01/18/2018

1 of 2

RIGHT TO APPEAL

If you believe your child care services were stopped due to a coalition error you should contact your eligibility specialist and provide the necessary documentation to resolve the issue. If you believe the issue was not resolved then you may file a formal written appeal which must be postmarked or emailed before your last day of child care services. Note: if your services have already ended or end in the less than 14 days; you have 14 days from the date the notice is mailed to appeal.

The action you are appealing is stated on the other side of this notice. Failure to file a timely appeal waives the right to an appeal.

Name: _____ Phone: _____

Address: _____

Reason for Appeal:

Note: Supporting documents to support your appeal must be attached.

Signature

phone #

Date

Return to:

Official Use Only

Date Appeal Received: _____ Supporting Documents Received: ____Y ____ N

☐ Approved ☐ Denied

Reason: _____

Signature



Public Information Record Request

Mail: P.O. Box 560692
Rockledge, FL 32956-0692
Phone: (321) 637-1800
Fax: (321) 637- 1897
Web: www.elcbrevard.org

Date: _____

Name: _____ **Phone:** _____

Mailing Address:** _____

**Required. If mail is selected below, this address will be used

E-mail Address: _____

Document(s) Requested (Be as specific as possible, provide official name of document(s) if known.)

Date needed: _____

Are you requesting copies or the opportunity to review the information?


☐ **Copy** **Select One:** ☐ **Mail** ☐ **Pick up** ☐ **Review Only**
(by Appt In Rockledge)

Signature: _____

Please return the completed form to the Early Coalition of Brevard County via fax, mail or in person to the main office located at 1018 S Florida Avenue in Rockledge, Florida.

5/3/18

\\Forms\Quality Assurance\Records Management

	Early Learning Coalition of Brevard County, Inc.	
	Policy	
	Issue Date: 3-23-12	
	Policy Number: ELCB-QA-0001-12	
	Subject: External Records Requests	
	Originating Department: Quality Assurance	
	Revision Date(s):	
	Date Approved by Board of Directors:	

Subject: External Records Requests


Purpose: To provide guidance regarding access to records and establish protocol for processing external records requests while such record is in the possession, custody, and control of the Early Learning Coalition of Brevard County, Inc. |

References:

- ❖ Article I, Section- 24, Florida Constitution
- ❖ Chapter 411, Florida Statutes (F.S.), Handicap or High-Risk Condition Prevention and Early Childhood Assistance
- ❖ Chapter 1002, Florida Statutes (F.S.), Student and Parental Rights and Educational Choices
- ❖ Chapter 119, Florida Statutes (F.S.), Public Records Law
- ❖ Chapter 112, Florida Statutes (F.S.), Drug-Free Workplace Act
- ❖ Chapter 382, Florida Statutes (F.S.), Vital Statistics


Definitions:

- ❖ **Actual cost of duplication-** The cost of the material and supplies used to duplicate the public record; does not include labor cost or overhead cost associated with such duplication.
- ❖ **Coalition-** The Early Learning Coalition of Brevard County, Inc.
- ❖ **Confidential Information-** Information prohibited from public inspection or copying under the Public Records Law.
- ❖ **Exempt records-** Records that are exempt from public inspection; an agency, however, is not prohibited from disclosing such records.
- ❖ **Extensive-** As used herein with reference to labor involved to accommodate a public records request, means where Coalition staff must spend more than one (1) hour to retrieve, copy, re-file, and redact the requested material in order to honor the request.

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- ❖ **Information Technology Resources-** Data processing hardware and software and services, communications, supplies, personnel, facility resources, maintenance, and training.
- ❖ **Public Record-** All documents, papers, letters, maps, books, tapes, photographs, films, sound recordings, data processing software, or other material, regardless of the physical form, characteristics, or means of transmission, made or received pursuant to law or ordinance or in connection with the transaction of official business by any agency.
- ❖ **Redact-** To conceal from a copy of an original public record, or to conceal from an electronic image that is available for public viewing, that portion of the record containing exempt or confidential information.
- ❖ **Registrant-** The persons whose birth is registered or reported, not the person (parent or otherwise) who accomplishes the act of registering the birth.
- ❖ **Sensitive-** Agency-produced software used to collect, process, store, and retrieve information that is exempt from s. 119.07(1); collect, process, store, and retrieve financial management information of the agency, such as payroll and accounting records; or control and direct access authorizations and security measures for automated systems.
- ❖ **Special Service Charge-** The fee that may be charged, in addition to the actual cost of duplication, if the nature or volume of material requested to be inspected, examined or copied is such as to require extensive use of information technology resources or extensive clerical or supervisory assistance by Coalition staff, or both.

Policy: It is the policy of the Coalition that all public records held in the possession of the Coalition that are not exempt or confidential shall be open for inspection and copying pursuant to the Florida Constitution and Florida Public Records Law. It is also the policy of the Coalition that a parent, guardian, or individual acting as a parent in the absence of a parent or guardian has the


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right to inspect and review the individual School Readiness and/or Voluntary Prekindergarten program record of his or her child and to obtain a copy of the record.

Protocol: The following protocol shall be applied to all external requests for records received by the Coalition unless otherwise noted.

❖ **General Public Records and Exemptions**

- **Public Records-** In addition to the definition provided above, the following information provides general information regarding what constitutes a public record:
 - Public records include all materials made or received by an agency in connection with official business which are used to perpetuate, communicate or formalize knowledge, regardless of whether in final form or the ultimate product of the agency, such as:
 - ◆ Documents circulated for review, comment or information, regardless of whether they are official expressions of policy or marked "draft." Examples include: interoffice memoranda, preliminary drafts of rules or proposals which have been submitted for review to anyone within or outside the Coalition, and working drafts of reports which have been furnished to a supervisor for review or approval;
 - ◆ Personal notes, if intended to communicate, perpetuate or formalize knowledge of some type;
 - ◆ Records stored on computer, video tape or audio tape, and electronic mail (e-mail) messages. Coalition e-mail in connection with official business is a public record comparable to any other written communication. Specific e-mail by subject matter, sender or recipient and inclusive dates may be requested. Exempt content of e-mails is not required to be disclosed and confidential content of e-mails must not be disclosed without the proper


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release. Personal e-mail, if not related to any official business of the Coalition, is not subject to the Florida Public Records law.

- Confidential and Exempt Records The following are examples of information deemed confidential and exemptions that may be routinely encountered when responding to public records requests:

▪ Administration

- ◆ Social security numbers. Sections 119.071(4)(a)1; 119.071(5)(a)3, F.S. (In certain circumstances, social security numbers may be provided to a commercial entity engaged in the performance of a commercial activity for a legitimate business purpose if the requirements of section 119.071(a)5, F.S. have been met). *See also* section 119.071(4)(a)2, F.S.
- ◆ Bank account numbers and debit, charge, and credit card numbers. Section 119.071(5)(b), F.S.
- ◆ Records directly relating to the physical security of Coalition facilities. Section 119.071(3), F.S.
- ◆ Federal tax information obtained pursuant to 26 U.S.C. section 6103 except as otherwise provided for by law. Section 192.105(1), F.S.
- ◆ Sealed bids or proposals received by the Coalition pursuant to invitations to bid or requests for proposals until such time as the Coalition provides notice of a decision or intended decision or within 10 days after bid or proposal opening (whichever is earlier). Section 119.071(1)(b)1.a., F.S.
- ◆ Rejected bids or proposals, if the Coalition concurrently provides notice of its intent to reissue the invitation to bid or request for proposals, until such time as the Coalition provides notice of a decision or intended decision pursuant to section 120.57(3)(a), F.S. concerning the reissued invitation to bid or

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request for proposals or until the Agency withdraws the reissued invitation to bid or request for proposals. Section 119.071(1)(b)1.b., F.S.

- ◆ A competitive sealed reply in response to an invitation to negotiate until such time as the Coalition provides notice of a decision or intended decision pursuant to section 120.57(3)(a), F.S. or until 20 days after the final competitive sealed replies are all opened, whichever occurs earlier. Section 119.071(1)(b)2.a., F.S.

- **Family Services**

- ◆ **Birth Certificates**


- All birth records to include certified copies of an original birth certificate or a new or amended certificate, or affidavit thereof.
- Birth records may only be released to the following individuals or entities.
 - The registrant if of legal age.
 - The registrant's parent, guardian or legal representative.
 - Upon receipt of the registrant's death certificate, to the registrant's spouse or to the registrant's children, grandchildren, siblings, if of legal age, or to the legal representative of any such persons.
 - To any person if the birth record is over 100 years old and not under seal pursuant to court order.
 - To a law enforcement agency for official purposes.
 - To any agency of the state or the United States for official purpose upon approval of the Florida Department of Health.

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- Upon order of any court of competent jurisdiction.

◆ **School Readiness**


- The individual records of children enrolled in School Readiness programs to include but not limited to assessment data, health data, records of teacher observations, and personal identifying information.
- A parent, guardian, or individual acting as a parent in the absence of a parent or guardian has the right to inspect and review the Individual School Readiness program record of his or her child and to obtain a copy of the record.
- School Readiness records may only be released to the following individuals or entities.
 - The United States Secretary of Education, the United States Secretary of Health and Human Services, and the Comptroller General of the United States for the purpose of federal audits.
 - Individuals or organizations conducting studies for institutions to develop, validate, or administer assessments or improve instruction.
 - Accrediting organizations in order to carry out their accrediting functions.
 - Appropriate parties in connection with an emergency if the information is necessary to protect the health or safety of the child enrollee or other individuals.
 - The Auditor General in connection with his or her official functions.
 - A court of competent jurisdiction in compliance with an order of that court in accordance with a lawfully issued subpoena.

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- Parties to an interagency agreement/grant agreement among early learning coalitions, local governmental agencies, providers of School Readiness programs, state agencies, and Florida's Office of Early Learning for the purpose of implementing the School Readiness program.
- ◆ **Voluntary Prekindergarten**
 - The records of a child enrolled in the Voluntary Prekindergarten Education Program to include but not limited to assessment data, health data, records of teacher observations, and personal identifying information of an enrolled child and his or her parent.
 - A parent has the right to inspect and review the Voluntary Prekindergarten Education Program record of his or her child and to obtain a copy of such record.
 - Voluntary Prekindergarten Education Program records may only be released to the following individuals or entities.
 - The United States Secretary of Education, the United States Secretary of Health and Human Services, and the Comptroller General of the United States for the purpose of federal audits.
 - Individuals or organizations conducting studies for institutions to develop, validate, or administer assessments or improve instruction.
 - Accrediting organizations in order to carry out their accrediting functions.
 - Appropriate parties in connection with an emergency if the information is necessary to protect the health or safety of the child or other individuals.

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- The Auditor General in connection with his or her official functions.
- A court of competent jurisdiction in compliance with an order of that court pursuant to a lawfully issued subpoena.
- Parties to an interagency agreement among early learning coalitions, local governmental agencies, Voluntary Prekindergarten Education Program providers, or state agencies for the purpose of implementing the Voluntary Prekindergarten Education Program.
- Human Resources
 - ◆ Social security numbers of current and former employees contained in employment records. Section 119.071(4)(a), F.S.
 - ◆ Medical information pertaining to prospective, current or former employees and medical claims of current or former employees and their covered dependents. Sections 110.123(9), F.S. and 760.50(5), F.S.
 - ◆ All information, interviews, reports, statements, memoranda, and drug test results, written or otherwise, received or produced as a result of a drug-testing program. Section 112.0455(11)(a), F.S.
 - ◆ An employee's personal identifying information contained in records regarding the employee's participation in an employee assistance program. Section 110.1091(2), F.S.
 - ◆ Workers' Compensation Claims medical records and reports of an injured employee and any information identifying an injured employee in medical bills. Section 440.125, F.S.
 - ◆ All records identifying individual participants in any plan under the employee deferred compensation program and their personal account activities. Section 112.215(7), F.S.


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- ◆ Direct deposit information. Section 17.076(5), F.S.
- ◆ Complaints and other records which relate to a complaint of discrimination in connection with employment, until a finding is made relating to probable cause, the investigation becomes inactive, or the complaint or other record is made a part of the official record of any hearing or court proceeding. Section 119.071(2)(g)1.a., F.S.

■ Information Technology

- ◆ Data processing software which has been obtained by the Coalition under a licensing agreement prohibiting its disclosure and which is a trade secret under section 812.081, F.S. (Section 119.071(1)(f), F.S.); and data, programs or supporting documentation which is a trade secret that resides or exists internal or external to a computer, computer system, or computer system network (Section 815.04(3)(a), F.S.).
- ◆ Risk analysis information relative to security threats to data and information technology resources. (Section 282.318(4)(c), F.S.); internal policies and procedures to assure the security of the data and information technology resources, which, if disclosed could facilitate the unauthorized modification, disclosure or destruction of data or information technology resources; and results of periodic internal audits and evaluations of a security program for the Coalition's data and information technology resources, except that the information shall be available to the Auditor General for post-auditing duties.(Section 282.318(4)(d), F.S.);
- ◆ Coalition-produced data processing software which is sensitive. Section 119.071(1)(f), F.S.

❖ **Violations and Penalties**

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- Any person who willfully and knowingly violates any of the provisions of the Public Records Law to include falsely or fraudulently representing an individual or entity in order to obtain confidential and/or exempt records commits a misdemeanor. Penalties may include criminal prosecution and/or sanctions, fines and imposition of attorney's fees for the cost of enforcing the provisions of the Public Records Law.

**NOTICE OF INELIGIBILITY**

Parent / Guardian Name: _____	Date: _____
Child (ren) Names: _____	_____
_____	_____


The application you submitted for School Readiness child care services has been declined for the following reason(s):

- ☐ Earned income not verified within timeframe allowed
- ☐ Unearned income not verified within timeframe allowed
- ☐ Income exceeds 150% of the Federal Poverty Level or exceeds 85% of the State Median Income
- ☐ Parent (s) / guardian (s) do not meet the work / education / training hour requirement
- ☐ Children did not begin care within time specified on child care certificate
- ☐ Age of children not verified or children are above age limit for services
- ☐ Residency / household size not verified
- ☐ Referral for services not valid (i.e. case closed; referral expired)
- ☐ Incomplete application (15 day expiration)
- ☐ Other _____

Right to Appeal

You have the right to appeal this notice within 14 days from the above date. The Coalition will respond within 30 days from the receipt of the appeal.

Family Services Specialist Signature

Early Learning Coalition of Brevard County, Inc. Procedure	
Issue Date: October 16, 2012	
Corresponding Policy: ELCB-FS-0002-12	
Subject: Appeals	
Originating Department: Family Services	
Revision Date(s): October 21, 2014	
Date Approved by Executive Director: N/A	

Subject: Appeals

References: Chapter 1002.91 Florida Statute, Rule 6M-9.400 and Early Learning Coalition of Brevard Rights and Responsibilities

Corresponding Policy (s): ELCB-FS-0002-12 Dispute and Appeals Policy

Definitions:

Coalition: Early Learning Coalition of Brevard County, Inc.

Recipient: Parent or legal guardian whose child was determined eligible for School Readiness or Voluntary Prekindergarten Education Program Benefits

Procedure: The preliminary appeal process begins when a client is notified of an adverse change in their services. If the recipient believes services were stopped due to a Coalition error they are to contact their specialist and provide the necessary documentation to resolve the issue.

If the recipient does not believe the issue was resolved then they may file a written appeal to the executive director (ED) or board designated executive staff person (ES) to begin the formal appeal process.

The following lists the steps in the process:

1. A written appeal must be submitted to the ED or ES. The appeal must fully describe the nature of the error the recipient believes has been made with supporting documentation.
2. The appeal must be postmarked, faxed, emailed or hand delivered before the date of the discontinuation/suspension of services. Failure to file a timely appeal waives the right of appeal.
3. If a timely appeal is filed, the recipient will not be suspended or terminated from the program until the written decision of the ED or ES or the original date of the discontinuation/suspension of services, whichever is later.
4. The ED or ES must respond to the recipient in writing within thirty (30) days of receiving the appeal with a decision as to whether the suspension or termination will be upheld or modified.
5. The recipient who wishes to appeal the decision of the ED or ES may request further review by an appeals committee in accordance with subsection (e) of 6M-9.400. The request must be

submitted to the coalition in writing within ten (10) calendar days of the date of the ED/ES written response.

6. Steps for review by the appeals committee are listed below:
 - a. The recipient is given the opportunity to present their position during a scheduled appeals committee meeting. The recipient is informed this is a public meeting and any information presented may be used by other state agencies.
 - b. The appeals committee is selected by the Chairman of the Board and a chair named.
 - c. The appeals committee will meet within forty-five (45) calendar days of receipt of the recipients appeal.
 - d. The recipient has up to thirty (30) minutes to present their appeal and any information they wish the committee to consider.
 - e. Coalition staff excluding the ED or ES (whichever made the initial decision) shall be available to provide any information requested by the committee.
 - f. The appeals committee will consider all statements, review all documents and may request additional evidence or information if necessary to make a decision. The final determination letter will be suspended for the length of time given to provide the additional information.
 - g. An appeals committee selected staff member, excluding the ED or ES, will take minutes of the event and final determination of the appeal.
 - h. The appellant will be notified in writing of the final determination within ten (10) days of the appeals committee meeting.
 - i. The appeals committee determination is final.



EARLY LEARNING COALITION OF
BREVARD COUNTY, INC.
PO BOX 560692
ROCKLEDGE, FL 32956-0692
PHONE: (321) 637-1800
FAX: (321) 637-7244

Executive Director's Report

Laura Gambino

June 2019

State and Office of Early Learning (OEL) Update:

- Attended a meeting of the Association of Early Learning Coalitions Executive Directors Retreat in Daytona Beach. The meeting contained information about legislative strategy, best practices, EFS Modernization status, partnership opportunities and policy updates. It was first introduction to state-wide executives and partners.

Coalition Update:

- First 30 days completed meetings with entire staff, attended first Board and Executive/Finance committee meeting, review of OEL State Annual 2019-2020 Grant and overview of annual operations and agency 2019.2020 Budget.
- Training and review of 2019.2020 Contracts for authorization and certification – total amount of certifications to complete by June 30th, 2019 is 110 provider contracts. United Way matching grant approved, signed and fully executed for 2019.2020 match.
- Community meetings with United Way CEO, Space Coast Health Foundation CEO, Brevard Family Partnership CEO and Melbourne Regional Chamber of Commerce CEO.
- Coalition will be partnering with Barnes and Noble for the annual Book Drive in Melbourne during the month of November and December 2019.
- Conducted quarterly ELC full staff meeting with Leadership Team. The meeting included kudos and recognition announcements, an EFS Mod update by Administrators and health benefits open enrollment informative session.
- Continuing to set up provider site visits and class observation visits.
- Conducted an IT inventory and consulting agreement review and meeting with leadership team to develop best methods of moving forward with IT support and management. Met with an IT consultant who can support on short term basis and assist with current on-site needs, input on hiring full-time manager and develop IT plan/layout for the new building and the move (plan will include a complete new phone and voicemail system for all ELC operations).

PROUDLY SUPPORTED BY:

OEL Grant Reobligation/Deobligation Recommendations FY18.19

School Readiness Projection – Recommend Reobligation Request of \$725,000

Actual/Projected Expenditures - Non-Slot							
OCA	Annual Budget	YTD Budget Allocation	YTD Expenditures	Non-Slot Expenditures Manual Adjustment (a)	Projected Non-Slot Expenditures	Projected OCA Surplus/Deficit at Year-End	
97BBA	\$ 802,180.00	\$ 735,331.67	\$ 698,486.29	\$ 12,000.00	\$ 773,985.04	\$	28,194.96
97FIR	\$ 11,927.00	\$ 10,933.08	\$ 846.50	\$ 23.00	\$ 946.45	\$	10,980.55
97LCA	\$ -	\$ -	\$ -	\$ -	\$ -	\$	-
978BD	\$ 226,712.00	\$ 207,819.33	\$ 200,666.71	\$ 7,500.00	\$ 226,409.14	\$	302.86
978DE	\$ 795,031.00	\$ 728,778.42	\$ 639,091.00	\$ 12,000.00	\$ 709,190.18	\$	85,840.82
Non-Direct *	\$ 130,909.00	\$ 119,999.92	\$ 106,425.99	\$ 5,000.00	\$ 121,101.08	\$	9,807.92
97Q00	\$ 286,904.00	\$ 262,995.33	\$ 78,449.66	\$ 8,000.00	\$ 93,581.45	\$	193,322.55
97QST	\$ 1,186.00	\$ 1,087.17	\$ 480.85	\$ -	\$ 524.56	\$	661.44
97QI4	\$ 329,091.00	\$ 301,666.75	\$ 246,224.01	\$ 13,000.00	\$ 281,608.01	\$	47,482.99
97QIN	\$ 74,896.00	\$ 68,654.67	\$ 53,803.07	\$ 3,000.00	\$ 61,694.26	\$	13,201.74
97INT	\$ 4,467.00	\$ 4,094.75	\$ 2,129.23	\$ -	\$ 2,322.80	\$	2,144.20
97IAS	\$ 36,812.00	\$ 33,744.33	\$ 32,916.65	\$ 900.00	\$ 36,809.07	\$	2.93
Quality **	\$ 329,036.00	\$ 301,616.33	\$ 217,890.16	\$ 5,000.00	\$ 242,698.36	\$	86,337.64
1					\$ -	\$	-
2					\$ -	\$	-
Total	\$ 3,029,151.00	\$ 2,776,721.75	\$ 2,277,410.12	\$ 66,423.00	\$ 2,550,870.40	\$	478,280.60

Projected Expenditures - Based on Prior and Current Year Trends							
Month	Children Served	Children Served Manual Adjustment Effect Through Year	Children Served (with Adjustments)	Slot Expenditures	Slot Expenditures Manual Adjustment	Slot Expenditures (with Adjustments)	
July	1	-	-	\$ 1,449,594.80	\$ -	\$ 1,449,594.80	
August	2	-	-	\$ 1,536,525.91	\$ -	\$ 1,536,525.91	
September	3	3,864	3,864	\$ 1,375,311.38	\$ -	\$ 1,375,311.38	
October	4	3,929	3,929	\$ 1,613,815.00	\$ -	\$ 1,613,815.00	
November	5	3,761	3,761	\$ 1,477,872.97	\$ -	\$ 1,477,872.97	
December	6	3,654	3,654	\$ 1,425,146.11	\$ -	\$ 1,425,146.11	
January	7	3,841	3,841	\$ 1,563,695.26	\$ -	\$ 1,563,695.26	
February	8	3,701	3,701	\$ 1,393,675.83	\$ -	\$ 1,393,675.83	
March	9	4,026	4,026	\$ 1,270,470.96	\$ -	\$ 1,270,470.96	
April	10	3,843	3,843	\$ 1,573,676.97	\$ -	\$ 1,573,676.97	
May	11	-	-	\$ -	\$ 1,737,991.00	\$ 1,737,991.00	
June	12	-	-	\$ -	\$ 1,850,000.00	\$ 1,850,000.00	
Supplemental	-	-	-	\$ -	\$ -	\$ -	
Total						\$ 18,267,776.19	

Final Projection			
	Step 1. Non-Slot	Step 4. Slot	Total
Budget:	\$ 3,029,151.00	\$ 17,063,686.00	\$ 20,092,837.00
Projection:	\$ 2,550,870.40	\$ 18,267,776.19	\$ 20,818,646.59
surplus/(Deficit):	\$ 478,280.60	\$ (1,204,090.19)	\$ (725,809.59)

CCEP Projection – Recommend deobligation of \$35,000

CCEP Projection		
Allocation CY	YTD Expenditures	Balance YTD
\$91,386.00	\$53,851.11	\$37,534.89

VPK Projection - Recommend deobligation of \$250,000

Grant Allocation -	\$11,530,805
Projected Expenditures -	11,265,115
Balance	\$ 265,690