



**EARLY LEARNING COALITION
OF POLK COUNTY**

Executive Committee Meeting

Early Learning Coalition – Lakeland Office
115 S. Missouri Ave., Suite 501
Lakeland, FL 33815

August 1, 2019

8:30 A.M.

Meeting Agenda

- | | | |
|-----------------------|---|------------------------|
| 8:30-8:35 A.M. | WELCOME/ROLL CALL | Kathryn Bevilacqua-Ely |
| | & | |
| 8:35-8:40 A.M. | APPROVAL OF THE MINUTES | |
| | <ul style="list-style-type: none">• February 13, 2019• March 4, 2019• March 8, 2019 | |
| 8:40-9:05 A.M. | BOARD VICE CHAIR | |
| | <ul style="list-style-type: none">• Conflict of Interest and Disclosures• Meeting Dates for Coming Year• Monitoring Report• Check Signing Policy• United Way Fundraising Agreement• CEO Evaluation | |
| 9:05-9:10 A.M. | CEO UPDATE | Marc Hutek |
| 9:10-9:15 A.M. | OTHER BUSINESS | |
| 9:15-9:20 A.M. | PUBLIC COMMENT | |
| NEXT MEETING | TBD | |

ADJOURN

Out of respect for your fellow members, please refrain from using electronic devices during the meeting.

**Early Learning Coalition of Polk County
Executive Committee Meeting
Summary Minutes**

February 13, 2019

2:00 p.m.

**Coalition Lakeland Office
115 S. Missouri Ave., Suite 501
Lakeland, FL 33815**

Katrina Lunsford, Board Chair
Meeting called to order at 2:00 p.m.
Welcome and roll call

Members Present: Jay Burns, Bill Dorman, Karen Greeson, Katrina Lunsford, and Dr. Elaine Thompson

Members Excused: Stacy Campbell-Domineck

Interested Parties: Gregg Heinkel, Avalon Sadler, and Dr. Marc Hutek

APPROVAL OF MINUTES – JANUARY 9, 2019

Motion: Bill Dorman

Second: Jay Burns Jr.

Abstain: Karen Greeson

Motion: Carried unanimously with revisions

NEW BUSINESS

Revisions to Meeting Minutes

Chair Lunsford expressed the continual refusal to include the content of her information in the minutes even after presenting written copies of the content. Chair Lunsford presented a 1/9/19 memo example of the denial to include the changes provided for the minutes. Meeting minute's summaries excluded her content. She shared that when she asked staff again about the minutes and time that was spent listening to the recording to make sure that the minutes were correct, she was told that she needed to hire a transcriber. Chair Lunsford asked the Executive committee what was their desire in handling this situation.

- Dr. Marc Hutek offered the option of transcribing meeting minutes.
- Member Karen Greeson said her understanding of minutes has always been a shortened version.
- Member Bill Dorman has never seen minutes that were verbatim in that depth of detail. He felt if there was ever a question we could go back to the recording.
- Dr. Elaine Thompson presented to Chair Lunsford an example of minutes dated June 1, 2016 that revealed a narrative format and suggested that meeting minutes drafts go to Dr. Hutek for review, then be presented to the Chair.
- Dr. Thompson asked Chair Lunsford concerning trust. Chair Lunsford indicated that she did not trust the process since there was an attempt to place a Board Member who resigned, due to violation of conflict of interest back on the Board of Directors.

Enhancement Committee Update – Karen Greeson

Enhancement Meeting Minutes from February 1, 2019.

- SmartCare Update
- Pay for Performance (PFP) Update
- HB 1091 – School Readiness Update
- Dr. Hutek – Governor’s Proposed Budget with increases for early learning.
- Staff member Kelly – Nemours Healthy Habits for Life Update

Board Chair Update – Katrina Lunsford

- Strategic Planning Canceled in March. However the Board Survey results by Tonya Deal – Capstone Project revealed Board Members were diverse in knowledge and need.
 - Presented a Conflict of Interest form.
 - Provided three areas of ad-hoc committees (as distributed) based on the Board survey by Tonya Deal.
 - Governance Committee
 - Program Policy and Strategy Committee
 - Providers’ Service Committee (Enhancement Committee)
 - Possibly add a Parent Committee
- Chair Lunsford Reviewed the following from Board Governance Prospective Out of the School Readiness Plan:
 - School Readiness Plan – Imbedded in the Procurement Policy is Extensive Conflict of Interest language for Board and Staff,
 - Training for Conflict stating “Governing board members will view page 45 of the Board Orientation,
 - Professional Service Request Form (Discussion last month when staff did not provide information).
- Out of the State provider’s survey, 10 responses were recorded out of 300 providers.
- Whistle Blower policy: Staff is mandated to report.
- Recommendation for greater governance guidelines.
- Dr. Thompson questioned roles of governance and management, and offered to work with Dr. Hutek on By-Laws and governance. Chair Lunsford presented her tab review of the 245 page School Readiness plan that dealt with Board Governance to Dr. Thompson.
- Chair Lunsford asked to have Board policies and guidelines made clear.

Chair Lunsford presented a complaint from (former employee) Ursula Simmons (as distributed), regarding possible missing money, password breach, and a provider payment not being paid. Dr. Hutek stated this is the first he has heard of this. He did get an email from Ursula Simmons saying she resigned. Is this something that should be dealt with by the Board, or should this have been brought to him? Chair Lunsford indicated that she received the complaint the day before the Executive Committee meeting, and she is required to do something. Dr. Hutek stated he would investigate and report back to the Board.

CEO Update - Dr. Marc Hutek: (as distributed)

- OEL, Eligibility and programmatic review on the 19th. EFS mod update.
 - Chair Lunsford asked about fallout of overpayments. Dr. Hutek stated staff is starting to plan repayment procedures.
- Kindergarten readiness – moving forward with assessment program.
- Polk BOCC Children’s Week proclamation, March 19th.
- Clarification on “Major Project” form.
- Update on the Wheels of Steel indoor custom bike show.
- Presented Crisis team - “The Nolan Team”
- Pearls, Preschool Emergency Alert Response Learning System.
- Habitat for Humanity on March 9th.

PUBLIC COMMENT

No public comment.

OTHER BUSINESS

There being no further business, the meeting adjourned at 3:13 p.m.

NEXT MEETING

TBD

**Early Learning Coalition of Polk County
Emergency Executive Committee Teleconference Meeting
Summary Minutes**

March 4, 2019

11:00 a.m.

**Coalition Lakeland Office
115 S. Missouri Ave., Suite 501
Lakeland, FL 33815**

Katrina Lunsford, Board Chair
Meeting called to order at 11:02 a.m.
Welcome and roll call

Members Present: Jay Burns, Stacy Campbell-Domineck, Bill Dorman, Karen Greeson, Katrina Lunsford, and Dr. Elaine Thompson

Interested Parties: Dr. Marc Hutek and Avalon Sadler

NEW BUSINESS

Chair Lunsford

Update on allegations

- A letter was mailed to the complainant.
- Contact made with Sarah Hall, Inspector General, and Rodney McKinnon, OEL Executive Director.
- Contact with Mike Carter of CliftonLarsonAllen, requesting contact with Stacy Campbell-Domineck, Finance Chair.

Member Campbell-Domineck recommended engaging CLA to conduct an accounting forensic analysis.

Motion: Stacy Campbell-Domineck

Second: Jay Burns

Motion: Carried Unanimously

- Member Campbell-Domineck met with Mike Carter of CliftonLarsonAllen. He recommended this investigation being conducted on top of the organizational audit that he is still working on.
- Specific details of the scope of work would have to be presented at a future meeting.
- Dr. Hutek asked if Ursula Simmons has seen the letter.
 - Chair Lunsford answered the Inspector General's office has contacted Ursula Simmons, and requested the accountant's scope of work.

Update on by-laws

- Dr. Thompson received a proposal from Robert Puterbaugh of Peterson Myers with the scope of work for \$300 an hour with a cap of \$1,500.

- At April's AELC meeting, Board Chair Patel from Hillsborough acknowledged recently working through the by-law process and offered to help.
- From a policy perspective \$1,500 dollars is not considered a procurement threshold and the recommendation is to move forward.

Dr. Thompson motions to approve Bob Puterbaugh with Peterson Myers for by-law revisions with a cap of \$1,500.

Motion: Dr. Elaine Thompson

Second: Stacy Campbell-Domineck

Motion: Carried Unanimously

Chair Lunsford would like to reach out to Mike Carter at CliftonLarsonAllen today for the scope of work.

PUBLIC COMMENT

No public comment.

OTHER BUSINESS

There being no further business, the meeting adjourned at 11:15 a.m.

NEXT MEETING

TBD

**Early Learning Coalition of Polk County
Emergency Executive Committee Teleconference Meeting
Summary Minutes**

March 8, 2019

8:30 a.m.

**Coalition Lakeland Office
115 S. Missouri Ave., Suite 501
Lakeland, FL 33815**

Katrina Lunsford, Board Chair
Meeting called to order at 8:35 a.m.
Welcome and roll call

Members Present: Jay Burns, Bill Dorman, Karen Greeson, Katrina Lunsford, Dr. Elaine Thompson, and Benjamin LeFrancois

Interested Parties: Diane Bowman and Avalon Sadler

NEW BUSINESS

Chair Lunsford

Update on Scope of Work from CliftonLarsonAllen

- Presented scope of work from CliftonLarsonAllen
- Entertain a motion to open up for discussion

Motion: Bill Dorman

Second: Jay Burns

Motion: Carried unanimously

- Member Dorman is in favor of the forensic analysis.

PUBLIC COMMENT

No public comment.

OTHER BUSINESS

There being no further business, the meeting adjourned at 8:40 a.m.

NEXT MEETING

TBD



www.elcpolk.org

Coalition Board Meeting Dates for 2019

January 16

February 20 (Tentative)

March 20

April 17 (Tentative)

May 15

June 19

July (No Meeting)

August 21

September 18

October 16

November 20

December (No Meeting)

These dates reflect the third Wednesday of each respective month. Please note that the months of February and April, are listed as tentative because historically these are months that have not required Board action; therefore, these dates will only have meetings if it is deemed necessary. Additionally, July and December are months when the Coalition will not meet as in years past. All regularly scheduled meetings listed above will begin at 8:30 a.m. and will take place at the Coalition's Lakeland Office (115 S. Missouri Ave., Suite 501, Lakeland, FL 33815), unless otherwise noted.



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ASHLEY MITCHELL
WINNIE SMITH
JUNIOR TAIT
EDWIN STEPHENS
TAKOYA LOVE-BATTLES

**ACCOUNTABILITY REVIEW
SPECIALIST**
FRED TRIPLETT

REPORT AS18-19.07
JULY 2019



OFFICE OF
Early Learning

LEARN EARLY. LEARN FOR LIFE.

***ACCOUNTABILITY MONITORING REPORT FOR THE
EARLY LEARNING COALITION OF POLK 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 Polk County (the Polk County 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), and Voluntary Prekindergarten (VPK), meets or exceeds service delivery and operational requirements.

The combination onsite and desk review began on Jan. 8, 2019, when the coalition received the monitoring notification letter. The onsite review occurred Feb. 19-21, 2019. The accountability review team reviewed the coalition's programmatic operations from July 1, 2017, through Feb. 28, 2019; and for SR and VPK services during the 2017-2018 and 2018-2019 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 CG, OPM, CCR&R, ESD, SR, VPK child, VPK provider, SR payment validation (SRPV), VPK payment validation (VPKPV) and (Data Accuracy) DA.

OEL will review all coalitions in the 2018-2019 review cycle for CG, OPM, CCR&R, ESD, SR, VPK child and VPK provider eligibility. OEL is not reviewing Data Accuracy for the 2018-2019 fiscal year due to the implementation of EFS modernization (statewide information system). 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	23	N/A	833
Family Child Care Homes	59	2	496	10
Private Centers/Schools	208	141	7,361	3,138
Public School Providers	4	71	16	1,849
Informal Caregivers	0	N/A	0	N/A
Total (unduplicated) ²	271	214	7,676	4,942

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.

Source – OEL Fact Book FY2017-2018 (as of Wednesday, May 1, 2019).

Organization and staffing – The coalition has a staff of 68 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 chief executive officer. At the time of the review, the board consisted of 22 members representing Polk 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, Community Outreach & Nominating, Program Quality Enhancements & Finance committees.

Scope of services –

During the review period, the coalition and its contractors 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 type="checkbox"/> Contractor
Health screening	<input type="checkbox"/> Coalition	<input checked="" 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
OEL statewide information system management	<input checked="" type="checkbox"/> Coalition	<input type="checkbox"/> Contractor
Information Systems Security	<input type="checkbox"/> Coalition	<input checked="" type="checkbox"/> Contractor

The coalition’s allocations for the SR and VPK programs in the fiscal year ending June 30, 2019, totaled approximately \$35,176,061. Expenditures³ totaled approximately \$24,468,966.00.

Early Learning Coalition of Polk County Reported SR and VPK Allocations and Expenditures		
Services	Allocation FY 2018-2019	Expenditures (as of May 1, 2019)
School Readiness	\$23,386,924.00	\$14,319,761.00
CCEP	\$350,595.00	\$7,946.00
Total SR	\$23,737,519.00	\$14,327,707.00
Voluntary Prekindergarten	\$10,987,068.00	\$9,831,847.00
Administration	\$439,123.00	\$288,061.00
Total VPK	\$11,417,191.00	\$110,119,908.00
Outreach, Awareness and Monitoring Initiative		
Outreach and Awareness	\$7,912.00	\$3,701.00
Monitoring	\$13,439.00	\$17,650.00
Total OAM	\$21,351.00	\$21,351.00
Total All Programs	\$35,176,061.00	\$24,468,966.00

Source – SR Notice of Award Oct. 5, 2018 ; VPK Notice of Award Oct. 5, 2018; OAMI Notice of Award July 1, 2018; and OEL Expenditure Worksheet April 16, 2019.t

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 chief executive officer 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 Polk Coalition’s bylaws set Robert’s Rules of

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

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 statutory and program requirements for board membership.** (*s. 286.011, 1002.83(2)-(11), Florida Statutes (F.S.); Rule(s) 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(s) 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.

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) –

OEL sampled four coalition staff and four contracted employees for background screening requirements.

The coalition did not verify completion of a level 2 background screening for two subcontractor employees prior to beginning work on the Grant Agreement. Additionally, the coalition did not obtain and maintain on file evidence that one of these subcontractor employees completed the initial level 2 background screening and a rescreen by the five-year anniversary of the employee's previous screening date.

OEL requires no further corrective action(s) –

The coalition submitted a process to track completion of level 2 background screenings for subcontractor staff in accordance with the Grant Agreement and statutory requirements.

- 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 F, G and II; 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 IV.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(s) 6M-9.400, FAC; CCDF State Plan 8.1.5; Grant Agreement, Exhibit II, section D.3; s. 1002.87(7). F.S.)

The coalition met all requirements for this criterion.

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.; Grant Agreement Exhibit II, section D.6; Exhibit IV, section II.F and IV.F)

This criterion is not applicable. The coalition provides SR and VPK services directly.

- 2. The coalition monitors SR child care providers in compliance with its approved 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.** s. 1002.82, F.S.; CCDF State Plan 5.3; Rule(s) 6M-4.630, FAC; Grant Agreement, Exhibit II, section D.6)

Finding(s) –

The coalition did not monitor two high-risk providers more frequently than annually during the 2017-2018 program year.

OEL requires no further corrective action(s) –

The coalition submitted documentation of staff training conducted on its monitoring protocol.

- 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)

Finding(s) –

The coalition's 2017-2018 and 2018-2019 VPK OAMI monitoring tool does not include –

- Validate director background screening.
- Validate classroom/instructors background screening.
- Verify completion of Child Certificate of Eligibility Form OEL-VPK 02 for all enrolled VPK children included in the sample.
- Verify compliance with VPK Provider Contract record maintenance requirements.

OEL requires no further corrective action(s) –

The coalition updated its VPK OAMI monitoring tool to comply with the most recent version of the VPK OAMI agreement.

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, Exhibit II, F.8 and Exhibit III, B.1)

Finding(s) –

OEL made a finding in the last accountability report, AS16-17.08, regarding the coalition’s VPK OAMI monitoring tool missing required elements. OEL made the same finding for the current review (see OPM-C.3).

OEL requires no further corrective action(s) –

The coalition submitted a procedure for verifying that the coalition updates its VPK OAMI monitoring tool annually upon execution of the VPK OAMI Grant Agreement.

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(s) 6M-9.300, FAC)

OEL made two Quality Assurance calls to the coalition’s offices and completed one online assessment(s). OEL used the 2018-2019 Quality Assurance Assessment Forms to determine compliance with this indicator. One call and the online request met all requirements, and one call did not.

Finding(s) –

Call No. 2, placed on March 5, 2019, did not meet –

- **Requirement No. 3** – The child care specialist did not obtain the type of care and schedule needed.
- **Requirement No. 8** – The specialist did not offer a child care listing.

OEL requires no further corrective action(s) –

The coalition submitted evidence of staff training on offering and obtaining all required CCR&R information during and after the CCR&R customer interview.

- 2. The coalition provides CCR&R services without cost to the individual requesting services within two business days of the individual’s request for services.** (*Rule(s) 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 home page of the website.** (*Rule(s) 6M-9.300(4)(b), FAC; Grant Agreement, Exhibit II, section C.1.2*)

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(s) 6M-9.300(4)(a), FAC; Grant Agreement, Exhibit II, sections C.4.5, C.4.14 and D.7.11*)

The coalition met all requirements for this criterion.

- 5. The coalition verified all CCR&R staff, including staff in blended positions, received training and certification according to CCR&R rule.** (*Rule(s) 6M-9.300(10), FAC; Grant Agreement, Exhibit II, section C.4.5*)

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, according to rule, to each family requesting service within two business days after the individual requested services and in the format the family requested.** (*s. 1002.92(3)(a)-(b), F.S.; Grant Agreement, Exhibit II, section C.4.12; Rule(s) 6M-9.300(6), FAC*)

Finding(s) –

For QAA call No. 2, the child care specialist did not provide a childcare listing or other required resources.

OEL requires no further corrective action(s) –

The coalition submitted evidence of staff training on offering all required CCR&R information during and after the CCR&R customer interview.

CCR&R-C. Community Resources Directory

- 1. The coalition maintains a current directory or access to community resources according to CCR&R rule.** (*Rule(s) 6M-9.300(7)(c), FAC; Grant Agreement, Exhibit II, C.4.3*)

The coalition met all requirements for this criterion.

CCR&R-D. Provider Information

1. **The coalition/CCR&R organization completes and approves provider information for each legally operating provider between Jan. 1 and May 31 of each calendar year.** (Rule(s) 6M-9.300(8), FAC)

This criterion is not applicable. Changes to Rule 6M-9.300, FAC, were effective on Oct. 21, 2018, effecting the Jan. 1, 2019, through May 31, 2019, provider update period, which was not complete at the time of the review.

2. **The coalition/CCR&R organization approves provider information updated outside of the provider update time period in the statewide information system within 15 calendar days of provider submission.** (Rule(s) 6M-9.300(8)(d), FAC)

This criterion is not applicable. Coalitions do not have to implement this criterion until June 1, 2019.

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 and Exhibit III, B.1)

The coalition met all requirements for this criterion.

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 calendar days of enrollment and the coalition's screening policies align with Rule 6M-4.720, FAC.** (s. 1002.84(5), F.S.; Rule(s) 6M-4.720(2)(b)-(c), FAC; Grant Agreement, Exhibit II, 6.5.1, 6.5.3 and 6.5.7)

Finding(s) –

One of the 10 children sampled did not receive a developmental screening within 45 calendar days of enrollment as rule requires.

OEL requires no further corrective action(s) –

The coalition submitted a process and a Homeless and Domestic Violence ASQ tracking log for verifying that school readiness children receive developmental screening within 45 calendar days of enrollment.

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

The coalition met all requirements for this criterion.

- 3. The coalition has a process to verify that parents 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(s) 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(s) 6M-4.720(5), FAC; Grant Agreement, Exhibit II, section 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(s) 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, F.8, Exhibit III, B.1)

Finding(s) –

The coalition's previous accountability report, AS16-17.08, contained a finding that the coalition did not verify completion of all developmental screenings within 45 calendar days of enrollment. The current report contains the same finding (see ESD-A.1).

Recommendation(s) –

ESD-B.1 –

- Develop and submit a procedure for verifying that the coalition is following its OEL-accepted corrective action plan. Submit documentation to OEL.
- Submit tracking reports to OEL for the first two quarters following this report's publication verifying screening of children within 45 calendar days of enrollment, including follow-up completed with parents and providers that did not complete screenings timely. Submit reports to OEL quarterly through the SharePoint corrective action plan folder for the 2018-2019 review on the Accountability Document Exchange.

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 OEL statewide information system information accuracy.

During the 2017-18 fiscal year, the coalition served 7,676 children in the SR program. Using the established risk assessment methodology, the review team examined 22 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 0.002% of the total SR children the coalition served. One 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(s) 6M-4.208(3) and 4.300, 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(s) 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(s) 6M-4.200(2), FAC)

The coalition met all requirements for this criterion.

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

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(s) 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 based on the assigned billing group.** (s. 1002.84(7), F.S.; Rule(s) 6M-4.200(2)-(3), FAC; CCDF State Plan 3.3)

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(s) 6M-4.200, FAC)

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 parents 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 (k), 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. 1002.82(2)(i), 1002.88(1)(c), 1002.88(1)(k) and 1002.88(2)(b), F.S.; Rule(s) 6M-4.620, FAC)

The coalition met all requirements for this criterion.

SR-I. Child Age Requirements

State and federal 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 receiving services for the remainder of the 12-month authorization period.

1. **The coalition confirmed that each child was younger than 13 years at the time of eligibility determination.** (45 CFR 98.20 and 98.21(a)(1)(ii); s. 1002.87(1), F.S.; Rule(s) 6M-4.200(1)(k)6 and 4.208(4)(a), FAC; CCDF State Plan 3.1.1 and 3.1.7)

The coalition met all requirements for this criterion.

SR-J. Definition of a Parent

Chapter 6M-4, FAC, states that a parent is a person who has legal custody of a minor as a natural or adoptive parent, legal guardian, person who stands in loco parentis to the minor or person who has legal custody of the minor by court order. "Person who stands in loco parentis" means a responsible adult with whom the child lives, who is responsible for the day-to-day care and custody of the child when the child's parent by blood, marriage, adoption or court order is not performing such duties.

- 1. Each applicant met the definition of a parent.** (45 CFR s. 98.2; s. 1002.97(1), F.S.; Rule(s) 6M-4.200(1)(e)-(g) and 4.208(4)(d), 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 the parent is a Florida resident.** (45 CFR s. 98.20(2) and (3)(i); Rule(s) 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 the parent's county of residence.** (ss. 1002.83(1) and 1002.89(5), F.S.; Rule(s) 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, prior to authorizing SR services, 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; Rule(s) 6M-4.208(4)(b), FAC; 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 each applicant acknowledged the income and calculations the coalition used to assess the parent copayment.** (*Rule(s) 6M-4.208(4)(g), FAC; CCDF State Plan 3.1.3, 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.** (*s. 1002.81(6), (8) and (15), F.S.; Rule(s) 6M-4.200(3) and 208(4)(f)6, FAC; CCDF State Plan 3.1.3, 3.1.4, 3.1.3, 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(6), (8) and (15), F.S.; Rule(s) 6M-4.208(4)(f)6, FAC; CCDF State Plan 3.1.3, 3.1.4, 3.1.5 and 3.1.7*)

The coalition met all requirements for this criterion.

SR-N. Family Unit Size

The coalition uses 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(s) 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)(b-c), 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. 98.45 (k); s. 1002.84(8), F.S.; Rule(s) 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 federal poverty level 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 s. 98.45(k)(4); s. 1002.84(8), F.S.; Rule(s) 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(s) 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 ss. 98.20(a)(3)(i) and (ii) and 98.21(a)(1)(ii)(E); s. 1002.87(4)-(6), F.S.; Rule(s) 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(s) 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 Statewide Provider Contract for the School Readiness Program 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 98.41 and 98.43; 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 complete and fully executed Statewide Provider Contract for the School Readiness Program in place with each provider prior to making any payments.** (s. 1002.88(1)(q), F.S.; Rule(s) 6M-4.610, FAC)

The coalition met all requirements for this criterion.

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 Coalition Services 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 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 file matched the information in the OEL statewide information system.** (s. 1002.82(2)(p), F.S.; Grant Agreement, Exhibit II, C.3 and C.6.1.5)

Finding(s) –

File No. 20 – The parent's address in OEL's statewide information system has a different zip code than the address on the residency documents.

OEL requires no further corrective action(s) –

The coalition corrected the following file(s) – #20

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(s) 6M-4.300, FAC; Grant Agreement, Exhibit II, C.1 and 2; CCDF State Plan 3.2*)

The coalition met all requirements for this criterion.

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, MM , and Exhibit II, C.6.2*)

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(s) 6M-4, FAC*)

Finding(s) –

The coalition revised its SR manual and wait list management procedures in January 2019. However, the coalition did not submit an SR Plan amendment to OEL for approval prior to implementation as Rule 6M-9.115, FAC, requires. The coalition’s last approved SR plan was July 3, 2018.

OEL requires no further corrective action(s) –

The coalition submitted its SR Program overview document, revised January 2019 and its plan amendment document dated May 15, 2019.

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

The coalition met all requirements for this criterion.

5. **The coalition or its designee conducted internal file monitoring activities to verify the accuracy of SR eligibility determinations.** (*Rule(s) 6M-4.208(1), FAC*)

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, F.8 and Exhibit III, B.1*)

The coalition met all requirements for this criterion.

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 22 SR child files for payment validation for March, April, May and June 2018. 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.

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, 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, FAC)

Finding(s) –

- **File No. 3** – The Enrollment/Attendance Certification shows the child attended 22 days, but the final reimbursement report shows payment for 18 days.
- OEL documented additional observations associated with this criterion in the SR payment validation work papers.

Recommendation(s) –

SRPV-A.2 file No. 3 – Submit to OEL documentation the coalition reimbursed the provider for Tuesdays in the months of January and March 2018, once the coalition is able to process payment adjustments in EFS mod.

3. The provider correctly documented excessive absences. (*Rule(s) 6M-4.500(4), FAC*)

The coalition met all requirements for this criterion.

4. The Final Provider Reimbursement Report matches the Enrollment/Attendance Certification. (*s. 1002.82(2)(p) and (r), F.S.; Rule(s) 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(s) 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(s) 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(s) 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 2017-18 fiscal year, the coalition served 4,972 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 0.004 % 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. 1002.53(2), 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 each child's eligibility based on statutory age requirements.** (ss. 1002.53(2) and 1002.66(1)(a), F.S.; Rule(s) 6M-8.201(3)(a) and 6M-8.500(1), FAC; Grant Agreement, Exhibit II, C.9.1.2 and 9.1.6)

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.; Rule(s) 6M-8.201(3)(b) and 6M-8.500(1), FAC; Grant Agreement, Exhibit II, C.9.1.6)

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 Coalition Services 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 Child Application) and upload to the Coalition Services Portal 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 Coalition Services 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 verification of the completed COE, shall complete a child's enrollment in the OEL statewide information system 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.; Rule(s) 6M-8.201(1) and (4)(e) and 6M-8.500(2), FAC; Grant Agreement, Exhibit II, C. 9.1.6)

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.; Rule(s) 6M-8.201(5) and 6M-8.500(2)(c), FAC; Grant Agreement, Exhibit II, C. 9.1.3)

The coalition met all requirements for this criterion.

- 3. There is documentation from the provider stating the child’s VPK class assignment.** (Rule(s) 6M-8.201(4)(b) and (5)(d), FAC; Grant Agreement, Exhibit II, C.9.1.6)

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% of the instructional hours for the program type or a child has not expended more than 70% 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 Coalition Services 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 Coalition Services 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 Coalition Services 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 Coalition Services 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 Coalition Services 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.; Rule(s) 6M-8.210 and 6M-8.500(6)(b), FAC; Grant Agreement, Exhibit II, C.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 statewide information system, currently the Enhanced Field System (OEL statewide information system) and the Coalition Services Portal. Coalitions must use OEL's statewide information system to establish eligibility for child care funding. OEL statewide information system data must accurately reflect the most current household circumstances that the applicant presented to the coalition. OEL statewide information system data is the basis for reimbursement and federal and state reporting.

The review shall consist of comparing VPK 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 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. 3 – The parent's address in OEL's statewide information system has a different zip code than the address on the residency documents.

OEL requires no further corrective action(s) –

The coalition corrected the following file(s) – #3

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 of the following school year. The child remains eligible until the child enrolls in 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, statutes and the Grant Agreement. (s. 1002.53, F.S.; Grant Agreement, Exhibit II, C.9.1. and C.9.2; Rule(s) 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, F.8 and Exhibit III, B.1*)

The coalition met all requirements for this criterion.

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 March, April, May and June 2018. 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.; Rule(s) 6M-8.305(3) and 6M-8.500(5), FAC)

The coalition met all requirements for this criterion.

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

- 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(s) 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(s) 6M-8.204, 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.

- 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.; Rule(s) 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(s) 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 OEL statewide information system. (*s. 1002.82(2)(n) and (p), F.S.; Rule(s) 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 2017-18 fiscal year, there were 214 VPK providers in the coalition’s service area. Using the established risk assessment methodology, the OEL team sampled 37 VPK classroom director and instructor credentials and qualifications within 10 child care provider sites to establish whether all instructors met qualifications before the coalition authorized the instructors to enter the classroom. The sample represents 0.046% of the total VPK providers in the service area. None of the instructor files reviewed contained 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(s) 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. (Rule(s) 6M-8.204(3)(a)-(b) and 6M-8.300(2), FAC)

The coalition met all requirements for this criterion.

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.; Rule(s) 6M-8.301 and 6M-8.500(4)(b), FAC; Grant Agreement, Exhibit II, C.9.)

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 Rule(s) 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) and 1002.57, F.S.; Rule(s) 6M-8.610, FAC)

The coalition met all requirements for this criterion.

- 4. Each lead instructor meets the required credentials.** (Rule(s) 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(s) 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.; Rule(s) 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.; Rule(s) 6M-8.410 and 65C-22.001(7)(a), 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.; Rule(s) 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, F.S., requires OEL to adopt a statewide kindergarten screening that assesses the readiness of each student for kindergarten based upon the Department of Education's (DOE) adopted performance standards under s. 1002.67(1) for the Voluntary Prekindergarten Education Program. DOE shall require that each school district administer the statewide kindergarten screening to each kindergarten student in the school district within the first 30 school days of each school year. Nonpublic schools may administer the statewide kindergarten screening to each kindergarten student in a nonpublic school who is enrolled in the Voluntary Prekindergarten Education Program.

Rule 6M-8.601(5)(a), FAC, states, "For the 2016-17 and 2017-18 VPK Provider Kindergarten Readiness Rates:

1. No provider will receive a new probationary status.
2. An existing provider on probation whose rate meets the criteria in paragraph (3)(b), is removed from probation.
3. An existing provider on probation whose rate did not meet the criteria in paragraph (3)(b), will remain on probation in their existing status."

Rule also states, "Beginning with the 2018-19 VPK Provider Kindergarten Readiness Rates, if the readiness rate of a private or public VPK provider falls below the minimum rate adopted by the State Board, the provider shall be placed on probation, notified of each designation by the Office of Early Learning, and acknowledge such designation on the website within twenty-one (21) calendar days of the publication of the final Provider Kindergarten Readiness Rates."

Note – On May 16, 2018, OEL announced that the State Board of Education approved Rule 6M-8.601, FAC, Voluntary Prekindergarten Provider Readiness Rate. As a result, each provider's 2016-2017 VPK Provider Readiness Rate is on the VPK Program Provider Kindergarten Readiness Rate website.

- 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.; Rule(s) 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.; Rule(s) 6M-8.700 and 6M-8.701, FAC)

OEL did not review this criterion. Rule 6M-8.601(5)(a), FAC, does not require an improvement plan for providers who did not meet the 2016-2017 Readiness Rate.

- 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.; Rule(s) 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.; Rule(s) 6M-8.603 and 6M-8.702, FAC; Grant Agreement, Exhibit II, C.9.5.1 and 9.5.2)

This criterion is not applicable. The coalition did not have any providers who failed to meet the Readiness Rate for two or more consecutive years.

- 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(s) 6M-8.605, FAC; Grant Agreement, Exhibit II, C.9.6.1 and 9.6.2)

This criterion is not applicable. The coalition did not have any providers on probation who selected staff development.

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.** (Rule(s) 6M-8.620 and 6A-1.09433, FAC; Grant Agreement, Exhibit II, C.9.6.3)

The coalition met all requirements for this criterion.

- 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.** (Rule(s) 6M-8.620 and 6A-1.09433, FAC; Grant Agreement, Exhibit II, C.9.6.1 and 9.6.2)

The coalition met all requirements for this criterion.

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(s) 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(s) 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(s) 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

Due to EFS modernization, OEL is not reviewing Data Accuracy for the 2018-2019 fiscal year.

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) _____

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

Child Care Resource and Referral (CCR&R) _____

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

Educational Services Delivery (ESD) _____

ESD-B.1 –

- Develop and submit a procedure for verifying that the coalition is following its OEL-accepted corrective action plan. Submit documentation to OEL.
- Submit tracking reports to OEL for the first two quarters following this report's publication verifying screening of children within 45 calendar days of enrollment, including follow-up completed with parents and providers that did not complete screenings timely. Submit reports to OEL quarterly through the SharePoint corrective action plan folder for the 2018-2019 review on the Accountability Document Exchange.

School Readiness Eligibility (SR) _____

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

School Readiness Payment Validation (SRPV) _____

- **SRPV-A.2 file No. 3** – Submit to OEL documentation the coalition reimbursed the provider for Tuesdays in the months of January and March 2018, once the coalition is able to process payment adjustments in EFS mod.
- See the SRPV spreadsheet for more information.

VPK Child Eligibility (VPKC) _____

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

VPK Payment Validation (VPKPV) _____

See the VPKPV spreadsheet for more information.

VPK Provider Eligibility (VPKP) _____

The coalition had no findings in this review area.

Data Accuracy (DA) _____

Due to EFS modernization, OEL is not reviewing Data Accuracy for the 2018-2019 fiscal year.

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.

MEMORANDUM

DATE: July 2, 2019
TO: Marc Hutek, Chief Executive Officer, Early Learning Coalition of Polk County
FROM: Reginal Williams, Program Integrity Manager, Office of Early Learning
SUBJECT: Management Addendum to Accountability Report AS18-19.07

As part of the Early Learning Coalition of Polk County's accountability review, OEL is providing business practice observations for the coalition's consideration. The observations are attached to this memo as the *Management Addendum* to accountability report *AS18-19.07*. These observations are not a part of the main compliance report. The operational definition of an observation is a specific instance, issue or circumstance that does not rise to the level of a finding but does warrant being brought to OELs and coalition management's attention. 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.

OEL does not require a response to any business practice observations or the associated suggested actions. If the coalition decides to address these observations, do so in a separate response within 30 days of the report's publication.

Contact Andrea Ward, accountability review supervisor, at 850-717-8609, with any additional questions.

RODNEY MACKINNON
EXECUTIVE DIRECTOR, OFFICE OF EARLY LEARNING

MANAGEMENT ADDENDUM TO REPORT AS18-19.07

Observations

The Office of Early Learning (OEL) Program Integrity Unit, Accountability Section, verifies compliance and accountability for early learning program implementation and operation through sound standards and best practices. Although the Accountability Section has addressed compliance issues within report AS18-19.07 that require a 30-day corrective action plan, the observations noted below address suggested business practices and training issues. OEL recommends that the coalition correct these issues to improve service delivery provided to children and their families.

Coalition Governance

- **CG-A.1** – The coalition’s website identifies a board member in the current Governor-appointed position of board vice chair who the Governor’s Appointment office has not approved.
- **CG-A.4** – One board member abstained from voting during the Feb. 21, 2018, and Aug. 15, 2018, board meetings. OEL confirmed that the abstentions were not due to a conflict of interest. Therefore, the member did not complete Form 8B. The coalition’s bylaws, Article III, Membership, Section VII, Participation, state, “The named agencies and members are required to attend meetings and to participate in efforts and activities of the Coalition.”
- **CG-B.1 item 1** – The Feb. 1, 2018, executive committee meeting minutes identified someone as an executive committee member who was not a member of the executive committee at that time.
- **CG-B.1 item 2** – The public notice for the April 9, 2018, and Nov. 20, 2018, executive committee meetings did not include the location of the meeting.
- **CG-B.1 item 3** – Two out of 27 SR and VPK providers, or 7%, who responded to the 2018-2019 Provider Customer Satisfaction Survey were not aware that provider representatives serve on the board, that board meetings are public or that providers may attend.

Suggested Action

- **CG-A.1** – Update the website identifying the board vice chair position as vacant until the Governor’s office approves the coalition’s pending nomination. Submit evidence of revision to OEL.
- **CG-A.4** – Conduct training on the requirements of the coalition’s bylaws including measures to implement so that all members participating by teleconference receive all meeting documents prior to or during the meeting, possibly electronically. Submit a copy of board member training to OEL.
- **CG-B.1 item 1** – Conduct staff training on the importance of accurate meeting minutes and record keeping. Submit copy of training to OEL.
- **CG-B.1 item 2** – Conduct training on the content of public notice of all public meetings. Submit a copy of training to OEL.
- **CG-B.1 item 3** – Inform all SR and VPK providers of their representatives’ role on the board and where to find meeting dates, times and locations.

Child Care Resource and Referral

CCRR-A.3 – The provider services contact information is not clearly displayed on the coalition’s home page.

Suggested Action

CCRR-A.3 – Update the coalition’s homepage to specify the coalition’s main telephone number is also the contact information for provider services. Submit proof of update to OEL.

Educational Services Delivery_____

ESD-A.4 – The coalition’s Initial Developmental Screening Protocol policy states that all child screening and individualized supports data will be tracked in EFS.

Suggested Actions

ESD-A.4 – Update the coalition’s process to specify that EFS Modernization will provide developmental tracking. Submit to OEL evidence of update.

POLK COUNTY SCHOOL READINESS COALITION, INC. D/B/A
EARLY LEARNING COALITION OF POLK COUNTY
POLICIES & PROCEDURES

**CASH CONTROL PROCEDURES
SECTION: 2**

Adopted: May 14, 2003

Amended: November 19th, 2014

I. POLICY

All revenue received is to be used in accordance with the intentions for which it was made available for organizational use. Receipts derived for services provided by the organization, whether received through governmental agency, donor, or as client fees are to be recorded upon receipt, deposited in Coalition's operating account, and applied for intended use as mandated by the grant agreement, state or federal law.

II. PROCEDURE

A. Cash Receipts

1. All revenue received by Coalition staff is immediately date stamped, restrictively endorsed, and forwarded to the Finance Department.
2. Receipts are coded to the appropriate funding stream and to the type of revenue received.
3. All employees with cash handling responsibilities will be bonded.
4. Accounting Responsibility
 - a. Accountant & Payment Manager will:
 1. Reconcile posting to the general ledger accounts monthly.
 2. Prepare journal entries as needed.

B. Cash Disbursements

1. Disbursements by Check
 - a. All checks are authorized by the Chief Executive Officer or designee and prepared by the Accountant & Payment Manager.
 - b. The Executive Committee will designate all persons authorized to sign checks.
 - c. A second signature by an authorized signer is required for checks in excess of \$500.00.
 - d. A second signature from a member of the Executive Committee is required for any expense check issued to the Chief Executive Officer or Chief Financial Officer.
 - e. Accountant & Payment Manager will not have check signing authority.
 - f. Checks will be pre numbered with perpetual accounting for sequence.
 - g. Unissued checks will be stored in a locked, secured area.
 - h. Voided checks will be marked "void" with the signature area removed and filed with the bank account records.

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POLICIES & PROCEDURES

- i. Checks are prepared only upon proper matching of supporting documentation such as vendor invoices, check requests, timesheets, or employment certification form and proper authorization.
- j. Supporting documentation (non-payroll) will be attached to a copy of the check.
- k. The check signer will review supporting documentation before signing.
- l. An accurate register of all bank account activity and balances will be maintained by the Accountant & Payment Manager.

2. Disbursements by Electronic Funds Transfer

- a. The Chief Executive Officer or a member of the Executive Committee will issue or authorize the Chief Financial Officer the authority to internally transfer monies.

3. Disbursements by Petty Cash Checking Account

Petty cash funds are established to provide for immediate payment of small purchases requiring payment on delivery. A petty cash account of no more than \$500 may be maintained by the Petty Cash Custodian. This responsibility will be that of the Accountant & Payment Manager or other staff member designated by the Chief Financial Officer.

- a. Receipts, vouchers and the amount of petty cash on hand must always equal the amount of the fund.
- b. The petty cash account is reconciled monthly by the Chief Financial Officer to the General Ledger balance.

C. Lost or Destroyed Checks

1. In the event a check is returned:

- a. Signatures on the check will be cut out and the check forwarded to the Accountant & Payment Manager.
- b. Backup materials will be pulled and attached to the check copy, with the check copy marked VOID. The accounting system will be adjusted for the voided check. The backup material will remain with the check copy if no new check is to be issued. If a new check is to be issued, staff will utilize the backup material to issue a check via the cash disbursement process.

- 2. Lost, stolen, or destroyed checks will be replaced following verification including notification of the bank to stop payment. After it has been confirmed that the original check was issued, cannot be found, and has not been cashed, the payee shall be issued a replacement check.

D. Bank Reconciliations

- 1. Accountant & Payment Manager will be responsible for reconciling the general ledger balance with the bank statement balances monthly. The Chief Executive Officer or designee will review and approve the bank reconciliations each month. The unopened bank statements and reconciliation reports will then be given to the Chair of the Finance Committee to be reviewed and signed indicating that the reconciliation report does reconcile with the original bank statements.
- 2. Collection of checks for insufficient funds and follow-up of outstanding checks which have not cleared in a timely manner will be as follows:

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- a. Accountant & Payment Manager informs Chief Financial Officer of any insufficient funds and outstanding checks over 60 days on a monthly basis.
- b. Accountant & Payment Manager will research and reconcile the insufficient funds check(s) as soon as possible.
- c. Accountant & Payment Manager will research all outstanding checks over 60 days on a monthly basis and will attach a completed state check form for each outstanding check to the monthly reconciliation report.
- d. If still unpaid six months after issue, outstanding checks shall be investigated for appropriate disposition and will comply with the Abandoned Property Law with the State of Florida.
- e. Cash or money order will be accepted for the insufficient funds checks and any further payment activity from that source.

E. Reports

1. Accountant & Payment Manager is responsible for producing a monthly Check Detail to be given to the Chief Executive Officer.
2. Chief Financial Officer will prepare monthly financials for the review of the Chief Executive Officer and to be distributed at Coalition board meetings.

**UNITED WAY OF CENTRAL FLORIDA
PARTNER PARTICIPATION AGREEMENT
July 1, 2019 – June 30, 2020**

United Way of Central Florida and Early Learning Coalition of Polk County Agreement.
(Name of Partner)

Because United Way of Central Florida, hereafter United Way, and its partner organizations work together for community betterment; because the operations of the partner organizations have such an important impact on the living climate of Polk, Highlands and Hardee counties (the “Tri-County Area”); because the community looks to United Way and its partner organizations to act in the best interest of the contributing public, the consumers of our services and the communities at large; it is, therefore, required and essential that a sound working relationship be established and maintained between United Way and the organizations in all aspects of fund raising, planning, budgeting, and public relations. Accordingly, the following agreement is accepted and reaffirmed by United Way and the above named partner.

1. MISSION OF UNITED WAY

United Way of Central Florida improves lives and builds stronger communities.

2. PURPOSE OF POLICY STATEMENT

The purpose of this statement is to clearly define policies of United Way of Central Florida so that each partner board member, staff member, United Way board member, United Way staff, and other United Way committees will understand the policies which guide United Way in its relationship to funded organizations. Each organization, when annually receiving funding from United Way, agrees to these policies.

3. BASIS ON WHICH FUNDS ARE INVESTED

Because in any year there is a specific amount of money available as a result of the United Way campaign and appropriate income-producing activities of partner organizations, it is a requisite part of community order and reason that available funds be accepted by partner organizations and that partner budgets be revised to conform to available funds.

Each United Way partner shall annually submit by the due date of each funding cycle: a request for United Way funding for designated services, a detailed program budget and the organization’s total anticipated expenditures and revenues for the coming year. In addition, partners must document results using indicators approved by experts on Impact Steering Teams. Should the partner submit this information after the deadline, the partner may be excluded from the allocation process. If the funding request is missing required documentation, the partner may be excluded from the allocation process or the partner will be required to submit the missing materials and may be fined up to 10% of the proposed allocation. Each funding request will be evaluated by a Community Investment Team, which will recommend an allocation to the Community Investment Committee. The Community Investment Committee will review the team allocation for each program and make an investment recommendation to the Community Impact Cabinet and the Board of Directors. The Board of Directors will make the final investment decision.

If the allocation differs from the amount requested by the partner, the partner will resubmit a revised budget showing income and expenditures in balance. All programs that receive an investment allocation must submit a semi-annual outcome measurement report for review by the Community Investment Committee in order to continue the distribution of funds.

A partner has the right to appeal to the United Way Community Investment Committee regarding (1) the initial investment decision, (2) exclusion from the funding process and/or (3) the fine assessed for missing requirements. The chair of the Community Investment Committee will form a five (5) member sub-committee for the purpose of hearing the appeal. The sub-committee will include the chair and/or co-chair of the Community Investment Committee, the chair and/or co-chair of the appropriate Community Investment Team and at least one member of the Community Investment Committee at large. The chairs and co-chairs may each assign a designee if he/she is unable to participate in the sub-committee. The CIO of Community Impact for the United Way of Central Florida will attend, but will not vote on decisions regarding the appeal. Appeals must be made in writing, within five business days of funding notices. The Community Investment Committee will determine whether an appeal is warranted based on the written request. Each appeal is made on a case-by-case-basis. Dissatisfaction with an allocation is not sufficient reason for an appeal. Appeals will be heard only when the partner is able to provide new information, which was not available when the original funding decision was made or when investment decisions appear to have been made with justification other than legitimate business reasons. The partner will be notified of the date of the appeal and will be given the opportunity to defend the written submission. The Community Investment Sub-Committee will make a recommendation to the Board of Directors. The Board of Directors will make the final decision on all appeals. The partner will be notified of the Board of Directors meeting and will be given an opportunity to appear before the Board of Directors at the meeting where the appeal will be considered.

All United Way allocated funds are restricted to and must be used for the services specifically mentioned in the partner application. Once a partner has received their allocation for the year, they may not materially change the scope or content of the funded program without prior written approval from the United Way Board of Directors. If a United Way funded program is canceled or discontinued, the United Way must be notified within five days of the decision to terminate the program. Funds which are distributed by the United Way, but over which it has no allocation control (i.e., Contributor's Choice donations, combined state and/or federal campaigns), may be used according to the discretion of each partner's Board of Directors.

The partner acknowledges that investments by the United Way are based on pledges and projections and that funding is dependent upon actual collections. In the event of a shortfall, that is not otherwise covered by reserves, the United Way agrees to reduce all allocations on a pro rated basis.

4. FUNDRAISING BY PARTNER ORGANIZATIONS

Partner organizations will make every effort to be as self-supporting as possible, consistent with United Way partnership.

5. CONDUCT OF WORKPLACE CAMPAIGNS

The United Way of Central Florida conducts workplace campaigns as the primary method of fundraising for its community fund.

PARTNER ORGANIZATIONS AGREE TO:

- A. Recognize the United Way's expertise in the conduct of these campaigns and refrain from direct workplace solicitation in the Tri-County service area.
- B. Participate in United Way training, including, but not limited to, speaker's training, *2-1-1 data entry training as needed*, training to assist with the application for funding process, and utilization of Andar software.
- C. Speak at United Way workplace presentations and solicit donations for the United Way Community Fund.
 - 1. Partners shall not solicit donor designations for its particular organization

THE UNITED WAY AGREES TO

- A. Continue to develop the relationships in the community, which will insure the continued health and expansion of the campaign.
- B. Recognize that participation in United Way presentations and events provides important public relations for partner organizations and insure that, where possible, all partner organizations have equal access to such presentations.
- C. Offer training for partners, including, but not limited to, speaker's training, *2-1-1 data entry training*, training to assist with the application for funding, and utilization of Andar software.

6. BALANCES AND DEFICITS

- A. Any unspent balance of the United Way allocation in the budget of a funded program at the end of the fiscal year shall be retained by the partner, shall be reported to the Community Investment Committee and shall be considered in budgeting for the succeeding year. If the partner is not funded for the succeeding year, unspent funds will be promptly returned to the United Way.
- B. If a partner anticipates a deficit in a funded program, an immediate conference with the United Way Community Investment Committee must be requested. Any deficits incurred by a participating partner during a fiscal year will not be paid by United Way unless a supplementary allocation has been specifically authorized by the United Way Board of Directors.

7. ANNUAL PARTNER AUDITS

- A. Any partner that is required to prepare (or does prepare) annual audited financial statements for any other purpose must annually submit a copy of the audited financial statements to the United Way of Central Florida.
- B. Any partner with budgeted revenues of \$500,000 or more must annually submit audited financial statements to the United Way of Central Florida.
- C. Any partner receiving an allocation of \$75,000 or more from the United Way of Central Florida in any year must submit audited financial statements for that year to the United Way of Central Florida.
- D. Any partner receiving an allocation of less than \$75,000 from the United Way of Central Florida in any year must submit a reviewed financial statement every 3rd year. UWCF reserves the right to request an audit or financial review upon request.

- E. All organizations receiving allocations from the United Way of Central Florida must annually submit a copy of IRS Form 990.
- F. A copy of the "Management Letter," if one is issued by the Certified Public Accountant, should be submitted with the audited financial statements. If the partner chooses, it can include its comments to the "Management Letter."
- G. Partner financial statements must be submitted within 120 days after the end of the accounting period. Requests for extensions must be submitted to the Community Investment Committee and extensions may be granted if extenuating circumstances are found. Requests for extensions must be submitted in writing at least 30 days prior to the due date.
- H. In addition to the foregoing, the United Way of Central Florida shall have the right to request any other financial information that it reasonably believes necessary for its Community Investment Process. The United Way of Central Florida reserves the right to terminate funding for any partner failing to comply with the requirements of this policy.

8. PARTNER PARTICIPATION

- A. United Way partner organizations agree to participate actively in the United Way Campaign, but only through the approved United Way campaign organization, by providing leadership, joint marketing and volunteer workers from their boards, committees, staff, and membership. All organizations with funded services shall conduct a United Way community campaign.
- B. If a United Way partner anticipates withdrawing from the United Way funding process, it must notify the United Way Board of Directors in writing six months prior to the start of a new campaign but in any event not later than March 1 of that campaign year.
- C. Partner organizations must include the United Way logo on **all** funded program-related and general organization communications including, but not limited to, newsletters, websites, letterhead, brochures, annual reports and fund-raising and promotional materials, without regard to the size of the United Way allocation. The United Way encourages partners to include a description of services provided with UWCF funding along with a link to the United Way website on the partner's website. **Logo must be printed in either black or UWCF branded colors only (Pantone 287, Pantone 179 and Pantone 143).** A statement of partnership with United Way of Central Florida is required to be included in all press-related materials such as: press releases, feature articles, news stories and any other form of publicity. Facilities housing programs funded by the United Way must post United Way signage (in UWCF branded colors) in high-traffic areas.
- D. The partner must notify the Communications and Marketing department of United Way of Central Florida when there is potential for negative publicity that could affect the reputation of UWCF and its ability to vet programs. UWCF recommends that the partner contact the Communications and Marketing department for support with handling the press.
- E. The partner is asked to enter information regarding all available services into the 2-1-1 data base. The 2-1-1 information and referral service is funded by UWCF to connect the public with the services they need. This requires up-to-date information available only if partners maintain current services and contacts. The partner is asked to provide UWCF with a contact who will be responsible for this task.

9. UNITED WAY AGREES

- A. To conduct annually a fund raising campaign to fund services aligned with target issues and indicators. Such campaign is to be conducted among all individuals and businesses in the Tri-County Area at the lowest possible cost.
- B. To set the campaign goal with due regard for anticipated future **community** needs but with equal consideration for the ability of the giving public to respond.
- C. To recognize the autonomy of partner organizations, except as necessarily limited by the principles of federated giving.
- D. To exercise only those controls and establish only such policies as are essential to the effective and successful operation of the United Way.
- E. To maintain a responsible Board of Directors consistent with the provisions of its by-laws and providing for broad community representation.
- F. To act as a responsible steward of funds publicly contributed to United Way by fully informing contributors of the allocation and use of such funds; to submit all records to an annual audit.
- G. To conduct its own operation subject to sound budget controls and fiscal procedures.
- H. To submit each program budget request to a Community Investment Team (CIT) to ensure public participation in the investment of funds.
- I. To permit flexibility and growth or exclusion as the needs of the community change by periodically admitting new programs from organizations who conform to the admission standards and satisfy unmet community needs and excluding those who no longer participate according to the agreement or who no longer meet those needs.
- J. To regularly evaluate all aspects of community need and to that end establish priorities for continuation of partnership or termination of partnership. Should any participating partner be terminated as a result of changes in community needs, a warning shall be given at least one year before funds are withdrawn. Funding is determined on an annual basis. Programs can lose funding with cause at the recommendation of the CIT and with approval of the Board of Directors at the end of any fiscal year.
- K. To market services and results produced by United Way of Central Florida partners.
To make signage and other promotional materials available to partners as requested.
To provide a link directly from the United Way website to all available partner websites

10. ANTI-TERRORISM COMPLIANCE MEASURES

In compliance with the USA PATRIOT ACT and other counterterrorism laws, the United Way of Central Florida requires that each partner certify the following:

“I hereby certify on behalf of Early Learning Coalition of Polk County (name of grantee) that all United Way funds and donations will be used in compliance with all applicable anti-terrorist financing and asset control laws, statutes and executive orders.

11. INTERPRETATION OF POLICIES

It is expressly understood and agreed that each participating partner will annually review the foregoing participation agreement with its respective board and will certify in writing its willingness to comply. It is also understood that any violation of the above agreement may result in the loss of part or all of a partner's United Way investment allocation.

I hereby certify that the above participation agreement was read, considered, and approved by a quorum of the board of directors of the signatory partner. Approval of this agreement does not guarantee funding.

PARTNER ORGANIZATION Early Learning Coalition of Polk County

ADDRESS 115 S. Missouri Ave., Suite 501, Lakeland, FL 33815

PARTNER BOARD PRESIDENT Kathryn Bevilacqua-Ely
(Please print name)

PARTNER BOARD PRESIDENT _____ DATE: _____
(Signature)

PARTNER EXECUTIVE DIRECTOR/CEO Dr. Marc Hutek
(Please print name)

PARTNER EXECUTIVE DIRECTOR/CEO _____ DATE _____
(Signature)

UNITED WAY BOARD PRESIDENT Greta Dupuy
(Please print name)

UNITED WAY BOARD PRESIDENT _____ DATE _____
(Signature)

UNITED WAY PRESIDENT/CEO Christina Criser Jackson
(Please print name) DATE _____

UNITED WAY PRESIDENT/CEO _____ DATE _____
(Signature)

ADDENDUM
DIVERSITY AND INCLUSION STATEMENT

Our vision for diversity and inclusion is to ensure that all of United Way of Central Florida policies, procedures, and practices are respectful of all individuals. We are committed to being a health and human service leader that meets the needs of our diverse community. We believe that the best way to meet those needs is for us to utilize the diversity of ideas and synergy of solutions that are inherent in a diverse board, staff, and volunteer organization.

Diversity and inclusion are at the heart of what it means to LIVE UNITED and are fundamental to achieving our mission and impact goals in education, income and health.

Non-Discrimination Policy:

Every person in our community is of value and can contribute to a healthy, safe, strong and caring community. In addition, United Way of Central Florida believes that people, no matter what their background, deserve to have access to the resources that will help them grow to their greatest potential.

Therefore, United Way does not fund any agency that discriminates in the provision of services through any program on the basis of race, color, religious creed, sex, national origin, ancestry, citizenship status, pregnancy, childbirth, physical disability, mental disability, age, military status or status as a Vietnam-era or special disabled veteran, marital status, registered domestic partner or civil union status, gender (including sex stereotyping and gender identity or expression), medical condition (including, but not limited to, cancer related or HIV/AIDS related), genetic information or sexual orientation in accordance with applicable federal and state laws.

This policy does not prohibit any agency from operating specific programs based on age, gender, health or disability designed to meet the special needs of target populations with those characteristics. Further, this policy does not prohibit any agency from selecting its leadership on any legal basis.

**UNITED WAY OF CENTRAL FLORIDA
COLLABORATIVE PARTNERSHIPS – 2019/20 ADDENDUM**

Because all funded agencies serve low-income families or individuals and because UWCF encourages comprehensive services that transcend the boundaries of individual impact areas, UWCF partners are asked to voluntarily host at least one financial education class annually. Classes may include 1 or more sessions.

Where facilities allow and where partners have routine interaction with adult clients, agency hosts are asked to provide:

1. An appropriate classroom setting.
2. A separate space for children of attendees if needed (agencies are not expected to provide childcare).
3. Invitations to at least 15 adults (clients, staff, others) who may benefit from the service and are willing to participate.
4. Encouragement to participate, which may include but is not limited to written invitations or flyers, written reminders posted on doorways and public areas, phone calls to clients who miss a session.
 - a. Financial Education Programs will provide agencies with a sample packet of materials and suggestions

The hosting program is NOT responsible for tracking results regarding outcomes (i.e. changes in credit scores, deposits into emergency savings accounts, job credentials, etc.)

Agencies are considered accommodating when items 1- 4 have been delivered. It is understood that attendance in classes may vary.

Funding is not connected with this request.

UWCF INCOME partners providing the financial education, credit or debt management classes will:

1. Contact certain agencies to request their voluntary participation; other interested agencies should contact United Way of Central Florida
2. Provide all classroom materials and incentive materials
3. Arrange for childcare or age appropriate financial education classes when needed and where possible
4. Match attendees with Money Coaches as is appropriate
5. Track data including required impact indicators such as bank statements or credit scores

I have read this 2019/2020 Addendum.

Our agency would like to volunteer. Our agency prefers not to participate.

Initials
Board President

Initials
Executive Director

(Name of Agency)

Agency Contact for Financial Education Classes (name and e-mail)

Preferred Month for classes