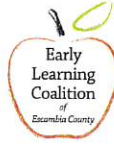


## **Board Meeting May 8, 2025**

### **Meeting Package**

<b>1. Agenda</b>	<b>1-2</b>
<b>2. Executive Committee Report</b>	<b>3-4</b>
<b>3. By-Laws &amp; Board Member Attendance</b>	<b>5-9</b>
<b>4. Anti-Fraud Plan, ELCEC 4101.1J and Benefit Recovery Procedure, ELCEC 4102.2B Approval</b>	<b>10-21</b>
<b>5. Warren Everett Resignation Letter</b>	<b>22</b>
<b>6. A-133 Audit for FY 2023-2024 Presentation</b>	<b>ATT</b>
<b>7. Audit and Tax Services RFP</b>	<b>ATT</b>
<b>8. Executive Director's Report</b>	<b>23-24</b>
<b>9. DEL Invoice Dashboard March 2025</b>	<b>25</b>
<b>10. Enrollment/Wait List Status Report</b>	<b>26-28</b>
<b>11. Contracting Summary</b>	<b>29-30</b>
<b>12. SR FY 2024-2025 Funding - Update</b>	<b>31-35</b>
<b>13. Board of County Commissioner designee – Deanna Oleske</b>	<b>36</b>
<b>14. SR Fiscal Year 2025-26 funding Projections</b>	<b>37-39</b>



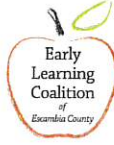
Early Learning Coalition of Escambia County  
Board Meeting Agenda  
May 8, 2025, at 10:00 a.m.

**Pages**

<b>I. Welcome and Introductions</b>	
a. Notification of this meeting of the Board of Directors was posted to the Coalition Public Calendar Board and sent to the Pensacola News Journal for publication on April 23, 2025	
<b>II. Public Comments</b>	
<b>III. Chair Opening Comments</b>	
a. Approval of Consent Agenda: Meeting Agenda, Minutes of February 13, 2025, Financials Reports for January, February and March 2025 (BA)	CA 1-CA 24
<b>IV. Mr. Mansker's Farewell Presentation</b>	
<b>V. Executive Committee Report</b>	3-4
a. By-Laws and Board Member Attendance (BA)	5-9
b. Edna Williams Board Member Status (BA)	
c. Richard Wright Rolled Off the Board (I)	
d. Brian Wyer Board Member Approval (BA)	
e. Tammy Hicks Nomination for Vice Chair and Continuation as Faith-based Rep (BA)	
f. Anti-Fraud Plan, ELCEC 4101.1J and Benefit Recovery Procedure, ELCEC 4102.2B Approval (BA)	10-21
g. Warren Everett Resignation Letter (D)	22
h. A-133 Audit for Fiscal Year 2023-2024 Presentation (BA)	Att.
i. Audit and Tax Services RFP - Draft (BA)	Att.
j. Adding/Deleting the Board Chair to the Bank Account (BA)	
<b>VI. Executive Director's Report</b>	23-24
a. Coalition Status Reports: DEL Invoice Dashboard for March 2025, Enrollment/Wait List Status Report, Contracting Summary Report (D)	25-30
<b>VII. Old Business</b>	
a. SR Fiscal Year 2024-25 Funding – Update (D)	31-35
1) Reob/Deob Request 6FEB25 - New NOA March 7, 2025 (D)	
2) Reob/Deob Request 30APR25	
b. Provider Arrested, SR Contract Terminations and Impact on Families (I)	

Key: (BA) = Board Approval (D) = Discussion (I) = Information Att = Attached file

*The mission of the Early Learning Coalition of Escambia County is to identify and meet the needs of children and families to lay the foundation for lifetime success by: maximizing each child's potential, preparing children to enter school ready to learn, and helping families achieve economic self-sufficiency.*



### **VIII. New Business**

- a. Board of County Commissioner designee – Deanna Oleske **(BA)** 36
- b. Legislative Session 2025 **(D)**
- c. SR Fiscal Year 2025-26 Funding Projections **(D)** 37-39
- d. DOE Single Sign On (SSO) Transition **(I)**
- e. Staff Issues **(I)**

### **IX. Audits and Reviews in Progress**

- a. DEL Desk Review 2 for 2024-2025 – Complete **(I)**
- b. DEL Accountability Review – In Process, Exit Conference May 20, 2025 **(I)**
- c. DEL Finance Review – On going **(I)**

### **X. Adjourn**

**Next Meeting: Thursday, August 14, 2025, at 10:00 a.m. at the Early Learning Coalition offices, 1720 W. Fairfield Dr., Suite 100/400, Pensacola, FL 32501**

**Key: (BA) = Board Approval (D) = Discussion (I) = Information Att = Attached file**

*The mission of the Early Learning Coalition of Escambia County is to identify and meet the needs of children and families to lay the foundation for lifetime success by: maximizing each child's potential, preparing children to enter school ready to learn, and helping families achieve economic self-sufficiency.*



## **Executive/Finance Committee Report Shannon Nickinson Chair**

The following is an informal summary of the last meeting of the Executive Committee. This summary is not to be considered the official minutes of the Committee as these comments precede formal approval of the Committee's Minutes at their next meeting. The summary is accurate in that the comments are lifted from the draft minutes of the Committee.

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The Executive Committee last met on March 27 and April 24, 2025.

From the March and April meetings the Committee reviewed the financial updates, invoice dashboards, utilization reports, and Resource Development Committee recommendations.

### **By-Laws and Board Member Attendance**

The By-Laws state that if a member misses three consecutive meetings in a Fiscal Year at the discretion of the Chairperson their position shall be declared vacant. Regarding attendance, the By-Laws do not differentiate between private sector and statutorily required members. Consideration should be made to address this topic the next time the By-Laws require revision.

### **Edna Williams Board Member Status**

Ms. Williams has not attended the last five meetings of the Board. No decision has been made regarding her status as a member of the Board.

### **Richard Wright Rolled Off the Board**

The second term of Richard Wright ended on February 13, 2025. By statute he had to come off the Board. He has chosen not to reapply in the near future.

### **Brian Wyer Board Member Approval**

The Executive Committee makes the motion that Bryan Wyer be appointed as a Director on the Board of the Early Learning Coalition.

### **Tammy Hicks Nomination for Vice Chair and Continuation as Faith-based Rep**

The Executive Committee makes the motion that Ms. Hicks be approved to be the Vice Chair of the Board of Directors.

### **Anti-Fraud Plan, ELCEC 4101.1J and Benefit Recovery Procedure, ELCEC 4102.2B Approval (BA)**

The Executive Committee makes the motion that the Anti-Fraud Plan and Benefit Recovery Procedure be approved.

### **Warren Everett Resignation Letter**

Without any prior notice or discussion, Warren Averett decided to no longer have the Coalition as a client. They did not elaborate as to why they made this decision, but it is possible it was because of how our last three audits have gone and the greater scrutiny the Coalition has placed on their performance.

May 8, 2025



### **A-133 Audit for Fiscal Year 2023-2024 Presentation**

Because Warren Averett has ended their relationship with the Coalition, the Finance Director will present the A-133 Audit for Fiscal Year 2023-2024 for acceptance.

### **Audit and Tax Services RFP**

A draft of the RFP for Audit services to commence with Fiscal Year 2024-2025 has been prepared for review and approval. The Evaluation Committee will consist of three Board members and two staff members. One additional staff member will be the recorder and administer the Evaluation Committee process. The Coalition is requesting three Board members volunteer to be on the Evaluation Committee.

### **Adding/Deleting the Board Chair to the Bank Account**

The bank requires formal Board approval to add or remove someone for our account. The EXCOM recommends the Board approve of removing the former Chair, Mr. Van Mansker, and adding the current Chair, Ms. Shannon Nickinson.

**BYLAWS OF THE ESCAMBIA COUNTY  
SCHOOL READINESS COALITION, INC.**

**ARTICLE I – NAME**

This organization shall be known as the Escambia County School Readiness Coalition, Inc., d/b/a Early Learning Coalition of Escambia County.

**ARTICLE II – NOT FOR PROFIT CORPORATION**

The Early Learning Coalition of Escambia County is a not-for-profit corporation as defined in Florida Statutes.

**ARTICLE III – DURATION**

The period during which this Corporation is to continue as a Corporation is perpetual.

**ARTICLE IV – REGISTERED AGENT**

The name and address of its Registered Agent shall be designated from time-to-time by resolution of the Board of Directors, as required by *Florida Statutes*.

**ARTICLE V – MISSION**

**Mission**

The Early Learning Coalition of Escambia County is created under Section 1002.84, *Florida Statutes*, for three (3) purposes: to administer school readiness program services that help parents prepare eligible children for school; to coordinate the provision of school readiness services on a full day, full-year, full-choice basis to the extent possible in order to enable parents to work and be financially self-sufficient; and to administer the voluntary pre-kindergarten program.

The mission of the Early Learning Coalition of Escambia County is to identify and meet the needs of children and families to lay the foundation for lifetime success by: Maximizing each child's potential; Preparing children to enter school ready to learn; and Helping families achieve economic self-sufficiency.

To support this mission, the Coalition upholds these values:

1. School readiness programs shall prepare children for success in school.
2. School readiness programs shall involve parents as their child's first teacher and support family skill building.
3. School readiness programs shall be an integrated and seamless system of services and shall be implemented by the local coalition working with partnering agencies and programs.
4. School Readiness programs shall be coordinated and public funding integrated to achieve effectiveness and efficiency.

**ARTICLE VI – VISION**

The vision of this Coalition is that all children in this community will enter school ready to learn.

## **ARTICLE VII –BOARD OF DIRECTORS**

### **Section I – Legislatively Mandated Directors**

According to Section 1002.83, *Florida Statutes*, Coalition Directors must be named in the legislation or be appointed. The named Directors of local Coalitions are designated by *Florida Statutes* as may be amended from time to time and any promulgated rule(s).

1.1 The Coalition Board of Directors shall be comprised of fifteen (15) to thirty (30) Directors. A “Director” refers to required, Private Sector Business and Optional representatives. More than one-third of the Coalition Directors must be Private Sector Business members, and neither they nor their families may earn an income from the early education and child care industry in Florida. Members of the Coalition are subject to the ethics and provisions in Section 112.313, 112.3135 and 112.3143, *Florida Statutes*.

1.2 The Governor of the State of Florida shall appoint the Chair and two other Private Sector Business Directors and shall specify the terms of those appointees.

1.3 Directors identified in Section 1002.83, *Florida Statutes*, are hereinafter referred to as “Ex Officio Directors.” Directors shall serve continuously while they are in their respective positions. A Director who is no longer in the position specified in statute that qualified him/her for directorship on the Coalition shall notify the Chairperson and his/her seat shall remain vacant until the organization or group he/she represents identifies a replacement. Any Director no longer serving in the position specified in *Florida Statutes* is ineligible to serve on the Coalition and the Chairperson shall seek a new appointment. If a designee has been selected to represent an Ex Officio Director, the designee becomes the voting Director. A voting Director may send a representative to a Coalition meeting but that representative will have no voting privileges.

1.4 Additional Directors who are appointed by the Directors from a list of nominees include a variable number of Directors whose primary residence is in Escambia County or who has a business interest in the form of ownership in Escambia County or who is a representative of a private sector business in Escambia County. These Directors, including the members appointed by the Governor, are hereinafter referred to as “Private Sector Business Directors.” Private Sector Business Directors, excluding Governor appointees, will serve terms of thirty six (36) months beginning in the month in which they begin serving on the Coalition.

1.5 Serving on the Board of Directors of the Coalition will require a commitment of time including regular attendance at meetings, participation in a Board orientation, committee involvement, reading and becoming educated about many aspects of early childhood education and care. Directors shall not receive compensation for their services. Directors may seek reimbursement for Coalition-requested travel expenses, subject to Coalition approval.

### **Section II– Voting**

Directors may be noted as present if they are participating by phone or other communication system that allows for hearing and participating in the discussion. Voting may take place by roll call at the discretion of the Chairperson. Roll Call votes will be recorded in the meeting Minutes. A majority of the Board of Directors of the Coalition constitutes a quorum required to conduct the business of the Coalition. Any action or decision of the Coalition shall require an affirmative vote by a majority of Directors present.

### **Section III– Meeting Attendance**

Should any Director miss three (3) consecutive meetings during the Coalition’s Fiscal Year, his or her position shall be declared vacant at the sole discretion of the Chairperson.

Confirmation of such absences and subsequent removal shall be given to the Director not less than thirty (30) days in advance, in writing. Notice of removal shall be given in writing to the Director not less than ten (10) days prior to such action.

## **ARTICLE VI –COMMITTEES**

### **Section I**

The Board of Directors may create standing and ad hoc committees to carry out the aims, purposes and business of the Coalition. In addition, ad hoc committees or subcommittees may be established by the Chairperson. Committees shall have such powers as the Coalition deems necessary to perform their duties.

### **Section II**

The Executive Committee shall be a standing Committee of the Coalition. Members of the Executive Committee shall be the Board Officers and Chairs of any other standing Committees established by the Board. The Executive Committee shall also serve as the Finance Committee, Nominating Committee of the Board, and the Appeals Committee for Recipient Fraud. The Executive Committee may take actions on behalf of the Board. Such actions must be approved by the Board at the next appropriate meeting, with the exception of actions of the Appeals Committee for Recipient Fraud as the Executive Committee is the final authority.

When the Executive Committee is acting as the Nominating Committee, it shall prepare a slate of candidates for each Director or Officer position to be presented to the Board of Directors. Nominations may be made from the floor at that meeting. Any person nominated shall have given prior consent to nomination and election as an officer. The nominee who receives the majority vote at a scheduled meeting for that purpose in each of the nominating categories will assume responsibility of his/her elected office when elected.

## **ARTICLE VII –FISCAL YEAR**

The Fiscal Year of the Coalition shall begin on July 1st of the year and continue through June 30th of the subsequent year.

## **ARTICLE VIII – MEETINGS**

### **Section I – Meetings**

Regular meetings of the full Board shall be held quarterly or at the discretion of the Chairperson.

Minutes of all Coalition meetings shall be kept and maintained. These Minutes shall be provided to Directors prior to the next scheduled meeting.

Meetings shall be in compliance with Section 286.011, *Florida Statutes*.



The Chairperson may call special meetings.

All Coalition Board meetings shall be chaired by the Chairperson or in the Chairperson's absence the Vice-Chairperson (or designee in the absence of both).

## **Section II- Quorum**

Fifty percent (50%) plus one Director of the Board of Directors of the Coalition shall constitute a quorum for the transaction of business at any meeting of the Coalition Board. If less than fifty percent (50%) plus one Director are not present at said meeting, the Chairperson or the Chairperson's designee may adjourn the meeting without further notice. If a Director vacancy occurs, the fifty-percent (50%) plus one Director will be based on the current Coalition Board of Directors.

## **ARTICLE IX- OFFICERS**

### **Section I – Titles**

The Officers of the Coalition shall consist of the Chairperson, Vice-Chairperson, Treasurer and Secretary. All Officers, except the Chairperson, shall serve two (2) year terms and shall be voting Directors of the Coalition. The Governor of the State of Florida shall appoint the Chairperson and specify the term of the appointment.

### **Section II – Duties**

The **Chairperson** shall develop the agenda in coordination with the Executive Director and preside at the meetings of the Board. The Chairperson shall appoint the chair of all committees and shall serve as an ex-officio member of all committees.

The **Vice-Chairperson** shall preside, in the absence of the Chairperson or in the event of the Chairperson's refusal or inability to act, at regular meetings and/or special meetings called by the Chairperson. The Vice-Chairperson, when acting on behalf of the Chairperson, shall have all of the power of and be subject to all of the restrictions upon the Chairperson.

The **Treasurer** shall have custody of all funds and securities of the Coalition and shall assure that a full and accurate account of receipts and disbursements in books belonging to the Coalition are kept and maintained. The Treasurer shall assure that all monies and other valuable effects are deposited to the credit of the Coalition in such depositories as may be designated by the Board of Directors, taking proper vouchers for such disbursements. The Treasurer shall render to the Board of Directors at the regular meetings of the Board, or whenever they require it, an account of all transactions and of the financial condition of the Coalition and shall perform all other duties delegated to that office.

The **Secretary**, in coordination with the Executive Director, shall keep at the principal office of the Coalition or such place as the Coalition may order, a book of minutes of all Meetings of the Board and general Board of Directors, recording names of those present and the proceedings thereof. The Secretary shall also see that all notices are duly given as required by law and shall perform all other duties delegated to that office.

Adopted August 8, 2024

#### **ARTICLE X- EXECUTIVE DIRECTOR**

The Coalition shall appoint an Executive Director who shall serve at the pleasure of the Coalition. The Executive Director shall perform the duties assigned by the Board of Directors. The Executive Director shall be responsible for hiring all employees and staff members under their direction and control.

The Executive Director shall have the authority to enter into contracts as the Board of Directors may approve or as approved by the Board of Directors through the enactment of policies pertaining to matters of procurement and program delivery.

#### **ARTICLE XI – RULES OF ORDER**

Robert's Rules of Order shall be the guidance for all matters or procedures not specifically covered in these Bylaws.

#### **ARTICLE XII – CONFLICT OF INTEREST**

The Board of Directors shall adhere to high standards of ethical conduct in governance and operations to ensure that the Board of Directors, staff and/or consultants do not have or give the appearance of conflicts of interest and do not use their relationship with the Coalition for personal gain.

#### **ARTICLE XIII – REVISION/REPEAL OF BY-LAWS**

These Bylaws may be amended, repealed or altered in whole or in part, by a two-thirds (2/3) majority vote of the Quorum present at any regular or special meeting. Any proposal to amend, repeal or alter these Bylaws shall be delivered in writing to Directors of the Coalition not less than thirty (30) days before the meeting in which the proposal is to be considered. An amendment to the Bylaws or the Articles of Incorporation constitutes an amendment to the Coalition's work plan.

ADOPTED THE 8th DAY OF August, 2024.

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ESCAMBIA COUNTY SCHOOL READINESS  
COALITION, INC.

By: Van Mansker

Its: Chairperson



## Early Learning Coalition of Escambia County Office Policies & Procedures

Title: Anti-Fraud Plan

ELCEC 4101.1~~KL~~

### 1.0 PURPOSE:

To establish guidelines that ensure the Coalition identifies, processes and prevents suspected fraud, misrepresentation, overpayments and abuse by recipients and that recipients are fully aware of appeal rights and process.

### 2.0 SCOPE:

This policy applies to all recipients and providers that participate in Early Learning Programs, including School Readiness (SR) and Voluntary Prekindergarten (VPK). This plan will be submitted annually to the Division of Early Learning, Inspector General.

### 3.0 DEFINITIONS:

**3.1 Recipient:** The parent or legal guardian whose child was determined eligible for School Readiness or Voluntary Prekindergarten Education Program benefits.

**3.2 Provider:** Any agency or person contracted with the Coalition to provide either School Readiness or Voluntary Prekindergarten Program services.

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

**3.4 Suspension:** Is when services are stopped temporarily, and recipients do not have to go back on the waiting list after suspension.

**3.5 Termination:** Is when services are ended, and the recipient will have to return to waiting list after the period of their termination has expired.

**3.6 Overpayment:** ~~The amount of funds paid~~ Payments made in excess that of what a recipient was not entitled to receive.

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### 4.0 ASSOCIATED DOCUMENTATION:

4.1 FAC 6M-9.400

4.2 FAC 6M-4.200

4.3 FAC 6M-4.400

4.4 F.S.S. 1002.9

### 5.0 RESPONSIBILITY / AUTHORITY:

**5.1** School Readiness Recipients are responsible for properly reporting employment, income, family size/living arrangements, address, and status of all children eligible for care. Additionally, they are responsible for properly reporting all changes affecting eligibility according to Rule 6M-4.200.



## **Early Learning Coalition of Escambia County Office Policies & Procedures**

**5.2** Voluntary Pre-Kindergarten Recipients are responsible for properly reporting their residence and child's age, and they shall maintain Florida residence throughout the VPK school year.

**5.3** School Readiness and Voluntary Prekindergarten Providers are responsible for adhering to the terms and requirements of their respective contracts. Providers are responsible for ensuring they do not misreport attendance, sign documents for parents and otherwise submit false claims for reimbursement.

**5.4** Providers are responsible for reporting suspected fraud committed by recipients. Suspected recipient fraud shall be reported to the Coalition in a timely manner, but no more than thirty days from detection of the suspected fraud.

**5.5** The Coalition shall refer all suspected fraud to The Division of Early Learning through the Fraud Referral Database and terminate any recipient that has been referred for suspected fraud except for valid at-risk referrals.

**5.6** Detection, reporting and prevention shall be the responsibility of ELCEC staff, providers, parents, and the public. Once detected, the Executive Director shall be notified along with the Program Integrity Unit for further review.

**5.7** The Operations Director will submit an electronic report monthly to the Executive Director and OEL of terminated recipients because of fraud, per Rule 6M.9.400 (b).

**5.8** The Eligibility Director, Finance Director and Executive Director will annually review job descriptions and internal processes to confirm appropriate separation of duties is in place and review internal controls to reduce risk.

### **6.0 EDUCATION, AWARENESS AND TRAINING:**

#### **6.1 STAFF EDUCATION, AWARENESS AND TRAINING:**

Department Directors will provide mandatory fraud prevention staff training annually and new staff training within thirty (30) days of hire to include:

**6.11** Staff will sign for receipt of the Employee Handbook covering Code of Conduct and Ethics, Whistleblower Policy, Workplace Conduct, and Conflict of Interest and Business Ethics.

**6.12** The *Employee Code of Conduct* statement shall be signed by each employee annually.

**6.13** Department Directors will provide all new staff training within thirty (30) days of hire to include, as applicable for duties assigned:

1. Client Applications and Forms, School Readiness Income Worksheet, Client Rights and Responsibilities.
2. Authorization for release of information and other related documents related to fraud prevention.
3. Recipient responsibility to report changes within fourteen (14) days of change and Coalition responsibility to implement, including acting on unreported changes, once discovered.
4. Quality interviewing techniques during intake, redetermination, and when reporting changes.
5. Eligibility staff are required to identify, verify and resolve case inconsistencies when inconsistencies occur.
6. What to look for in an altered or falsified document.



## **Early Learning Coalition of Escambia County Office Policies & Procedures**

- 7. Identifying inconsistencies and errors in reimbursement paperwork.
- 8. Reporting procedures for suspected recipient or provider fraud.
- 6.14 All staff shall receive mandatory fraud prevention and Whistleblower training annually.

### **6.2 SR and VPK PARENT EDUCATION and AWARENESS:**

- 6.21 Display fraud awareness posters in interview rooms at ELC.
- 6.22 Include a fraud awareness statement in SR parent packets with ELC phone number to report any suspected fraud.
- 6.23 Family Eligibility Specialists will review responsibilities of parent in detail at interview, including importance of reporting changes in their circumstances within fourteen (14) days.

### **6.3 SR and VPK PROVIDER EDUCATION and AWARENESS:**

- 6.31 Encourage child care providers to report potential fraud to ELC staff through provider communication venues including email or portal communications, and appropriate provider group meetings.
- 6.32 Periodic reminders to providers about procedures in place to prevent fraud in addition to regular practices of monitoring that occur with providers that also keep providers aware of ELC's intention to prevent and/or detect fraudulent practices.
- 6.33 Email and/or portal communicated reminders to providers of what to look for and how to report potential fraud.
- 6.34 Include fraud reporting and fraud consequences in provider contract signing briefings.

### **6.4 PUBLIC EDUCATION AND AWARENESS:**

- 6.41 Display of fraud awareness posters in each staff office and waiting areas to include Program Integrity Unit phone number to report any suspected fraud.
- 6.42 Statement on website with phone number [and an online form](#) to report potential fraud for parents, providers, and general public.

## **7.0 RECIPIENT ANTI-FRAUD PLAN PROCEDURES:**

### **7.1 GENERAL PROCEDURES:**

- 7.11 The Operations Director shall have the primary responsibility for implementing and coordinating the anti-fraud activities of the Coalition. The contact information for the Operations Director is:
  - Dawn Engel
  - 1720 W. Fairfield Dr, Ste 100/400
  - Pensacola, FL 32501
  - 850-332-6740
- 7.12 Monthly review, research, and follow up of data quality reports generated from Division of Early Learning by Eligibility Director.





## Early Learning Coalition of Escambia County Office Policies & Procedures

7.13 Documented verification of child care referrals from other organizations through manager signature, if required, and periodic cross reference review of children in service.

7.14 Once inconsistencies are identified through any of the above means, contact parent or legal guardian and obtain verification from parent or legal guardian to resolve inconsistencies, which could include but not limited to income, residential documentation, or household composition, and determine if situation is resolved or warrants next steps of due process provisions for termination or suspension of School Readiness or Voluntary Prekindergarten benefits by Eligibility Staff and Director.

7.15 Monthly electronic reporting to the Division of Early Learning of recipients terminated for suspected fraud.

7.16 Monthly unscheduled internal reviews of work products for all departments will be conducted by Program Integrity Unit.

7.17 The Operations Director is the Coalition Fraud Investigator; and as such is the Administrator of the *Fraud Referral System*. The contact information for the Operations Director (Lead Fraud Investigator) is:

Dawn Engel  
Operations Director  
1720 W. Fairfield Dr, Ste 100/400  
Pensacola, FL 32501  
Contact: 850-332-6740, [dengel@elcescambia.org](mailto:dengel@elcescambia.org)

### 7.2 **PROCESSING SUSPECTED RECIPIENT FRAUD:**

The Coalition, if by its own inquiries, or as a result of a complaint, has reason to believe that a recipient has engaged in, or is engaging in, a fraudulent act, an ELCEC Fraud Referral shall be completed and forwarded to the Operations Director/Fraud Investigator after the incident has been discussed with the Executive Director and given approval to process for fraud. In the event the incident results in an overpayment in lieu of fraud, the incident will be processed as such following the Benefit Recovery Procedure. The Operations Director/Fraud Investigator shall either conduct the fraud investigation, assign a member of the PIU staff to conduct the fraud investigation. The person assigned shall conduct a review and determine whether overpayment has occurred due to possible fraudulent act. During the review, the investigator may examine all records, including electronic benefits transfer records, and make inquiry of all persons who may have knowledge as to any irregularity incidental to the disbursement of public moneys or other items or benefits authorizations to clients. If assigned, the PIU staff will brief the Operations Director/Fraud Investigator of their findings. The Fraud Investigator shall brief the Eligibility Director on the fraud referral and at that time will complete a Fraud Referral on the Fraud Referral System website. Note that the Coalition's fraud investigation and appeals procedures will complement the DEL referral process to Department of Financial Services through the Fraud Referral System.

### 7.3 **SUSPECTED RECIPIENT FRAUD NOTIFICATION AND PROCESSING:**

7.31 **Advance Notice** - The Coalition shall provide written advance notice of the termination to the recipient that clearly advises of the following information at least 14 days from intent to terminate services, if services are still being provided:



## Early Learning Coalition of Escambia County Office Policies & Procedures

1. Allegations
2. Basis for allegations
3. Intended action
4. Date the action is being imposed
5. Appeal process, including notice that a written appeal must be filed within 14 days of the Coalition's advance notification.
6. A statement in bold that failure to file a timely appeal waives the right to appeal
7. Notice that repayment must be made if conclusion of fraud is upheld by the legal authorities.
8. Procedure for the recipient to obtain a copy of his or her file
9. Amount of overpayment to be recovered
10. Length of time of termination
11. Potential for repayment for benefits received after receipt of the written advance notice.

Note: Per 6M-9.400 (4)(a), the written advance notice should be translated into the recipient's native language if the coalition's other communications with the recipient have been translated.

**7.32 Pre-Appeal Process** - If the recipient believes the fraud is an error, the recipient has the option to attempt to resolve the issue with the Coalition by contacting the Operations Director. The recipient must provide documentation to the Operations Director sufficient to show where the suspected fraud did not occur. The Operations Director shall participate in any meetings. The Executive Director (ED) shall not be involved in the process. Electing to use the Pre-Appeal Process does not relieve a recipient from the requirement to file a written appeal within 14 days of the advance notice from the Coalition in order to preserve the recipient's appeal rights.

**7.33 Executive Director Appeal Process** - If a recipient believes the Operations Director did not resolve the issue, or if they elect to omit the pre-appeal process, they have a right to file an official complaint with Executive Director as follows:

1. Submit a written appeal to the Executive Director within 14 days of the written advance notice from the Coalition.
2. The appeal must fully describe the nature of the error in the fraud allegation and provide any backup documentation.
3. The letter from the recipient must be postmarked or emailed before the effective date of the intended action, or 14 days from the date of the Coalition's advance notification letter, whichever is earlier.
4. If the recipient fails to file an appeal in a timely manner the right to appeal will be waived.
5. If the recipient files an appeal in timely manner, services, if still being provided, shall not be suspended or terminated until the written decision of the Executive Director or the effective date of the intended action, whichever is later.



## Early Learning Coalition of Escambia County Office Policies & Procedures

6. The Executive Director must respond to the appeal within 30 days with a decision if the suspension or termination will be upheld, modified or rescinded.

**7.34 Board Appeal Process** - If recipient believes the Executive Director did not resolve the issue, they have a right to request a second appeal with an Appeals Committee appointed by the Board of Directors as follows:

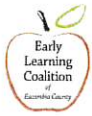
1. If the recipient appeals the Executive Director's decision, the appeal must be made in writing within 10 days of the Executive Director's decision letter.
2. The Appeals Committee for recipient fraud for the Coalition shall be the Executive Committee of the Board of Directors. The Chair of the Appeals Committee shall be the Board Chair.
3. The Appeals Committee shall be convened within 45 days of receipt by the Coalition of the appeal. Appeals will normally be heard at the next scheduled monthly meeting of the Executive Committee.
4. The recipient shall be notified that this is a public meeting, and that any information presented may be used by other state agencies.
5. The Committee shall afford the recipient up to 30 minutes to present their position and any information they wish the Appeals Committee to consider.
6. The Coalition staff, excluding the Executive Director or other executive staff person designated by the Coalition Board, shall be available to provide any information requested by the Committee.
7. The Committee will consider all statements, review all documents and may request any additional evidence or information from the parties if a Committee member believes it is necessary and relevant to the decision making. The required final determination letter will be tolled for the length of time given to provide the additional information.
8. The Committee shall select or appoint a member of the Coalition, excluding the Executive Director the Coalition or other executive staff person designated by the Coalition Board, to memorialize the events of the Committee hearing and the final determination including the basis for the decision.
9. The appellant shall be notified in writing within ten days of the Appeal Committee's determination.
10. The determination of the Appeals Committee shall be final.

### **7.4 FOLLOW-ON PROCESSING OF REFERRED RECIPIENT FRAUD:**

**7.41** All background information gathered by the Coalition will be made available to Florida's Division of Early Learning and Department of Financial Services to aid in an extended investigation. Coalition staff shall be available upon request for further action involving fraud cases such as court appearance.

**7.42** Should a civil charge of fraud be brought against the recipient and if the recipient is found guilty and ordered to make restitution, the recipient shall not apply for services with the Coalition for five (5) years.





## Early Learning Coalition of Escambia County Office Policies & Procedures

7.43 If the client is found not guilty or case is dropped the client may apply for services. If the recipient is found guilty, nolo-pros, or adjudication withheld the recipient will not be allowed to participate in any ELCEC program until court actions are complete.

7.44 If complete restitution is not paid, the recipient will not be allowed to participate in the SR or VPK program until restitution is paid in full.

7.45 Once restitution is paid in full the recipient may apply for new services.

7.46 If the case has been appealed and found insufficient for evidence of fraud or misrepresentation, then the client may apply for new services.

### 8.0 PROCESSING SUSPECTED PROVIDER FRAUD

8.1 The Coalition shall use all means available to prevent, detect, and process provider fraud, to include use of the monitoring program, review of monthly reimbursement requests, parent complaints, and other reports of suspected fraud.

8.2 The Coalition shall follow procedures and requirements for dealing with suspected and adjudicated fraud contained in the statewide School Readiness Provider Contract, and statewide Voluntary Prekindergarten Provider Contract.

8.3 Any decision to suspend or terminate a provider contract shall also be in accordance with the respective provider contract. Should the provider choose to dispute the decision of the Coalition regarding contract suspension or termination for suspected fraud, the provider shall be instructed to follow the dispute resolution procedures in their respective contract.

8.4 Per the School Readiness and Voluntary Prekindergarten contracts, any contract suspension or termination shall remain in effect until the completion of any investigation and any subsequent legal proceedings. Additionally, providers who have been referred for suspected fraud whose investigation or proceedings are still ongoing shall not be allowed to sign new contracts. The due process procedures for providers will be provided for in the contract between the coalition and the provider, pursuant to Rule 6M-4.610, F.A.C. 6M-9.400 (5)

### 9.0 RECORDS RETENTION

All records will be retained for five years in accordance with the Coalition's policy.

10.0 ATTACHMENTS: Coalition Fraud Plan Organizational Structure  
Benefit Recovery Procedure



## Early Learning Coalition of Escambia County Office Policies & Procedures

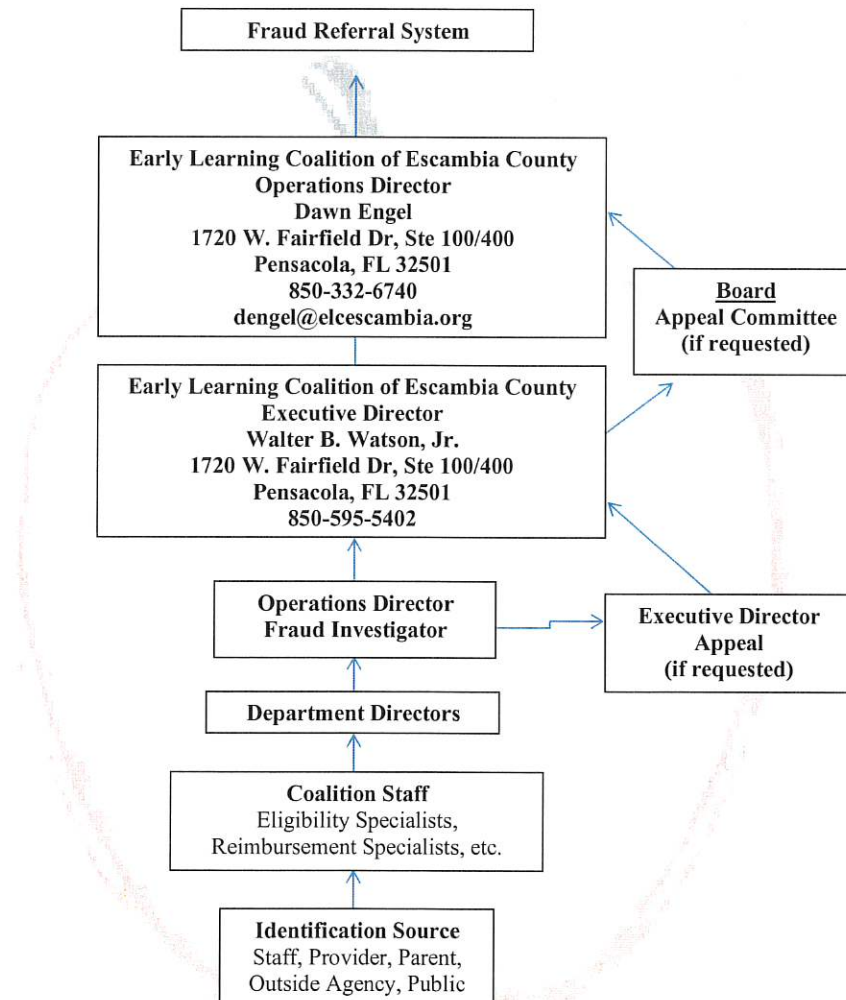
### Document Revisions

<i>Revision Date</i>	<i>Change Description</i>
<i>December 11, 2014</i>	<i>Initial Board Approval</i>
<i>June 10, 2015</i>	<i>Reviewed, no revisions</i>
<i>February 11, 2016</i>	<i>Add Provider Fraud Policy, Amend other policy</i>
<i>October 13, 2016</i>	<i>Add Advance Notice Translation note</i>
<i>June 8, 2017</i>	<i>Revision to reporting and termination process</i>
<i>October 23, 2017</i>	<i>Revision to contacts and compliance with Rule</i>
<i>June 14, 2018</i>	<i>Annual update, revision to contacts</i>
<i>June 13, 2019</i>	<i>Annual review and approval, no changes</i>
<i>June 11, 2020</i>	<i>Annual Review and updates for ELC reorganization</i>
<i>June 9, 2022</i>	<i>Revisions to address of Coalition</i>
<i>December 8, 2022</i>	<i>Revisions to reporting and DEL name change</i>
<i>June 8, 2023</i>	<i>Annual review and approval, no changes</i>
<i>June 13, 2024</i>	<i>Annual review and approval, no changes</i>
<i>August 8, 2024</i>	<i>Revision removing outdated Benefit Recovery Processes</i>
<i>May 8, 2025</i>	<i>Revisions adding Overpayment Payment Processes and Approval</i>



## Early Learning Coalition of Escambia County Office Policies & Procedures

### Fraud Plan Organizational Structure





## Early Learning Coalition of Escambia County Office Policies & Procedures

**Title: Benefit Recovery Procedures**

**ELCEC 4102.2AB**

### **1.0 Purpose:**

To establish procedures regarding collection efforts of any overpaid benefit amount.

### **2.0 Background:**

A client/recipient, provider or any other entity receiving state or federal funds from the Coalition may be obligated to repay funds in full or part for various reasons, including, but not limited to:

- Overpayment
- Improper payment
- Disallowed payment as a result of audit
- Reconciliation of an advance payment for the Voluntary Prekindergarten (VPK) program which results in a deficiency at the end of a fiscal year

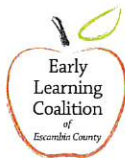
The grant agreement between the Division of Early Learning (DEL) and the Coalition requires the Coalition to repay any overpayment or disallowed expenditure. Once due diligence is exercised by the Coalition to secure full payment of a delinquent account, the Coalition must return funds to the DEL.

### **3.0 Collection Efforts:**

The Coalition will exercise due diligence in collection efforts as follows:

- **Request for Repayment.** The Coalition will request the debtor, in writing, to repay the funds via money order or cashier's check made payable to the: Early Learning Coalition of Escambia County. The following information will be included in this request:
  - Amount of overpayment,
  - Reason the debtor is obligated to repay the funds, and
  - Date by which the debtor is requested to repay the funds.
- **Establish a Repayment Schedule.** The Coalition may negotiate a repayment schedule that will allow a debtor to submit partial repayments, but the repayment schedule may not exceed more than six (6) months after the repayment date specified in the Request for Repayment. Upon notification from the debtor, the Finance Department will issue an invoice with the payment schedule via certified mail, return receipt requested.
- **Offsetting Payment.** The Coalition may offset, in full or in part, an amount that a debtor owes the Coalition for one early learning program with state or federal funds due from the Coalition to the debtor for another early learning program. If the Coalition offsets state or federal funds across programs, it will accurately enter the transaction in the accounting records according to the Coalition's fiscal policies.





## Early Learning Coalition of Escambia County Office Policies & Procedures

- **First Demand for Repayment.** The Coalition, within ten (10) calendar days after the date the debtor's account becomes delinquent, will issue the debtor a demand letter via certified mail, return receipt requested. The first demand letter will include the following:
  - Full amount of overpayment;
  - Reason the debtor's account is delinquent;
  - Demand for immediate repayment of full amount by a date within thirty (30) calendar days after issuance of the demand letter;
  - Debtor's right to dispute the delinquent account by submitting a written dispute to the Coalition before a date specified within the letter; and
  - Description of the collection efforts the Coalition may use if the debtor fails to repay the delinquent account.
- **Second Demand for Repayment.** The Coalition, within ten (10) calendar days after the debtor fails to repay a delinquent account in full by the date required in the first demand letter, will issue the debtor a second and final demand letter by certified mail, return receipt requested. The second demand letter will include the following:
  - Full amount of overpayment;
  - Reason the debtor's account is delinquent;
  - Demand for immediate repayment of the full amount by a date within ten (10) calendar days after issuance of the second demand letter;
  - Debtor's right to dispute the delinquent account by submitting a written dispute to the Coalition before the date specified in the first demand letter, if the date is not expired;
  - Notice that debtor may not receive further state or federal funds from the Coalition until the debtor repays the delinquent account in full.
  - Date services will be terminated if the debtor fails to respond within the ten (10) calendar days.

#### 4.0 **RECORDS RETENTION:**

All records will be retained for five years in accordance with the Coalition's policy.

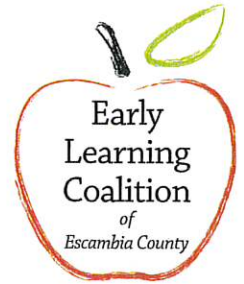
#### 5.0 **ATTACHMENTS:** None.

#### Document Revisions

<i>Revision Date</i>	<i>Change Description</i>
November 14, 2024	Original.
<u>May 8, 2025</u>	<u>Revised</u>

**EARLY LEARNING COALITION OF ESCAMBIA COUNTY**

Address 1720 W Fairfield Dr Ste 100/400  
Pensacola, FL 32501 US  
bwatson@elcescambia.org



**SAMPLE INVOICE**

**INVOICE**

BILL TO  
SAMPLE

INVOICE #  
REIMBURSEMENT

DATE  
04/10/2025

TERMS  
Net 10

DUE DATE  
04/29/2025

DATE	ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
03/31/2025	Due from Parents-Reimbursement for Child Care Expenses	Due from Parents-Reimbursement for Child Care Expenses	1	0.00	0.00

Contact EARLY LEARNING COALITION OF ESCAMBIA COUNTY to pay.

BALANCE DUE

**\$0.00**  
**PAID**