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**REPORT AS24-25.07
AUGUST 2025**



**DIVISION OF
Early Learning**
LEARN EARLY. LEARN FOR LIFE.

ACCOUNTABILITY MONITORING REPORT FOR THE EARLY LEARNING COALITION OF ESCAMBIA COUNTY

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

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

The review began on Dec. 9, 2024, when the coalition received the monitoring notification letter. The accountability review team reviewed the coalition's programmatic operations from July 1, 2023, through Feb. 28, 2025; and the coalition's monitoring reports and supporting documentation for SR and VPK services the coalition delivered during the 2023-2024 and 2024-2025 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 deliver program services.

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I. Authority

Federal and Florida laws, rules and regulations mandate that DEL 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)(s) 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. DEL 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

DEL 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 DA.

DEL will review all coalitions included in the 2024-2025 review cycle for all review areas. DEL 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 providers and the number of children served. The number of children served includes eligible children birth through school age.

Number of SR Providers	Number of VPK Providers	Number of School Readiness Children	Number of Voluntary Prekindergarten Children
84	75	3,576	1,809

Source – DEL (SR and VPK children served as of November 2024) and Escambia (SR and VPK providers) FY2023-2024 annual reports

Organization and staffing – At the time of review commencement, the coalition had a staff of one part-time and 34 full-time employees who implement the programmatic aspects of the coalition's board of directors' mission.

Board governance – The coalition's board of directors serves as the coalition's policy-making entity and delegates authority to the coalition's executive director. At the time of the review, the board consisted of 19 members representing Escambia County. Membership composition includes representatives from both the private and public sectors. The standing committees, established according to the coalition's bylaws, that support the board are the Executive, Finance, Nominating and Appeals committees.

Scope of services –

During the review period, the coalition and its contractor, Digital Boardwalk, 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 checked="" type="checkbox"/> Coalition	<input type="checkbox"/> Contractor
Developmental screening	<input checked="" type="checkbox"/> Coalition	<input type="checkbox"/> Contractor
SR provider recruitment	<input checked="" type="checkbox"/> Coalition	<input type="checkbox"/> Contractor
VPK provider recruitment	<input checked="" type="checkbox"/> Coalition	<input type="checkbox"/> Contractor
SR provider training	<input checked="" type="checkbox"/> Coalition	<input type="checkbox"/> Contractor
VPK provider training	<input checked="" type="checkbox"/> Coalition	<input type="checkbox"/> Contractor
DEL statewide information system management	<input checked="" type="checkbox"/> Coalition	<input type="checkbox"/> Contractor
Information Systems Security	<input checked="" 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, 2025, totaled approximately \$23,359,206. Expenditures¹ totaled approximately \$14,998,950.

Early Learning Coalition of Escambia County Reported SR and VPK Allocations and Expenditures		
Services	Allocation FY 2024-2025	Expenditures (March 14, 2025)
School Readiness	\$18,162,724.00	\$10,832,776.00
SR Match	\$179,449.00	\$131,591.00
Total SR	\$18,342,173.00	\$10,964,367.00
Voluntary Prekindergarten	\$4,778,127.00	\$3,972,663.00
Administration	\$238,906.00	\$61,920.00
Total VPK	\$5,017,033.00	\$4,034,583.00
Total All Programs	\$23,359,206.00	\$14,998,950.00

Source – SR Notice of Award March 7, 2025; VPK Notice of Award July 1, 2024; and DEL Expenditure Worksheet

¹ Expenditures in the table represent cost categories that support the scope of the accountability review and are not all-inclusive.

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

V. Coalition Governance

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

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

In addition, 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

DEL 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. (ss. 286.011 and 1002.83(2)-(12), Florida Statutes (F.S.); Rule(s) 6M-9.110 and 115, FAC; Article I, Section 24(b), Florida Constitution)**

Finding(s) –

The coalition has two governor appointee positions that have been vacant since Dec. 18, 2018, and Oct. 15, 2021, respectively. DEL did not receive documentation that the coalition has made efforts to recruit applicants to fill these vacancies, and the Governor's Office of Appointments stated it has not received any applications.

The coalition completed the following corrective action(s) –

CG-A.1 – The coalition updated its process for documenting board member recruitment efforts.

Recommendation(s) –

CG-A.1 – Submit documentation of the coalition's board meeting minutes from August 2025 discussing governor appointee vacancies.

-
2. **The full board and committee meeting process includes decision-making by quorum.** (*s. 1002.83(7)(8), 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(9), F.S.; Grant Agreement, Exhibit IV. IV(B), (I) and (K)*)

The coalition met all requirements for this criterion.

4. **Each board member discloses the nature of the board member's interest as a public record in a memorandum (Form 8B) and the minutes document the disclosure, as statute requires.** (*ss. 112.3143 and 1002.83(9), F.S.; Rule(s) 34-7.010(1)(f), FAC; Grant Agreement, Exhibit IV. IV(B), (I) and (K)*)

Finding(s) –

Three board members at the Aug. 8, 2024, board meeting completed Form 8B, declaring a conflict of interest. However, the board members did not abstain from the vote and the meeting minutes do not include that the board members completed the forms..

DEL requires no further corrective action(s) –

CG-A.4 – The coalition submitted staff training.

CG-B. Board Meeting Accessibility and Sunshine Law

DEL 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.; Government in the Sunshine Manual; s. 1002.85(2), F.S.; Rule(s) 6M-9.110, FAC*)

The coalition met all requirements for this criterion.

CG-C. Previous Corrective Actions

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

1. **The coalition implemented its previous CG corrective action plan.** (*Grant Agreement, Exhibit II, F.8; and Exhibit III, B.1*)

This criterion is not applicable. The coalition had no previous findings in this review section.

VI. Operations and Program Management

DEL 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

DEL 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. 435.03, 435.04, 943.052 and 1002.84(10), F.S.; Grant Agreement, Exhibit I, section E*)

Finding(s) –

- **Item 1** – None of the two sampled coalition and two sampled contracted staff members with more than five years of employment completed a background rescreening within five years of the date of their previous completed background screenings.
- **Item 2** – DEL did not receive documentation that the coalition obtained and maintained on file documentation of employment history for three out of four sampled contracted staff members, as the DEL Grant Agreement requires.

Recommendation(s) –

OPM-A.1 –

- **Item 1** – Develop and submit a process to verify that all coalition and contracted staff complete a rescreening within five years of the most recent background screening date.
- **Item 2** – Develop and submit a process to verify that the coalition obtains and maintains on file all contracted staff members' employment histories, if their positions require it.

- 2. The coalition certified that it complies with requirements for VPK and SR records, including records access, confidentiality and retention, as approved in the coalition's SR plan.** (*Grant Agreement Exhibit I, sections F, G, HH and II; ss. 119.07, 1002.72, 1002.88 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 II, section C.2.5*)

The coalition met all requirements for this criterion.

OPM-B. Improper Payments

DEL 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 disenrollment procedures for the sampled cases, as rule requires.** (*Rule(s) 6M-9.400, FAC; CCDF State Plan 10.1 and 10.2; Grant Agreement, Exhibit II, section D.3; s. 1002.87(7), F.S.*)

The coalition met all requirements for this criterion.

OPM-C. Monitoring of Subrecipients and Child Care Providers

DEL 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(15) and 1002.85(2)(h), F.S.; Grant Agreement Exhibit II, section D.6, and Exhibit IV, section II.G and IV.F*)

This criterion is not applicable. The coalition does not have a subrecipient.

2. **The coalition monitors SR child care providers according to the coalition's 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, 5.4, 5.5 and 10; Rule(s) 6M-4.630, FAC; Grant Agreement, Exhibit II, section D.6.5*)

Finding(s) –

- **Item 1** – DEL did not receive documentation that the coalition completes Tier 1 monitoring each program year for 100% of its contracted SR providers.
- **Item 2** – The coalition served 86 SR providers during fiscal year 2023-2024. The minimum monitoring sample was 50 providers, but submitted documentation showed that the coalition monitored 42 providers.

Recommendation(s) –

OPM-C.2 –

- **Item 1** – Develop and submit a process to verify that the coalition completed Tier 1 monitoring each program year for 100% of its contracted SR providers.
 - **Item 2** – Develop and submit an updated policy that states the coalition will monitor the minimum sample size of SR providers each fiscal year. The coalition should submit the updates to the SR Plans Section.
3. **The coalition has a monitoring process and tool for onsite VPK child care provider monitoring based on DEL Grant Agreement requirements.** (*DEL Grant Agreement, Exhibit II, section D.6.6-6.9; DEL-VPK 20*)

The coalition met all requirements for this criterion.

OPM-D. Previous Corrective Actions

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

1. **The coalition implemented its previous OPM corrective action plan.** (*Grant Agreement, Exhibit II, F.8; and Exhibit III, B.1*)

Finding(s) –

DEL made a finding in the last accountability report, AS22-23.06, that appears in the current monitoring report regarding the coalition not completing Tier 1 monitoring for 100% of its SR providers (see OPM-C.2).

Recommendation(s) –

OPM-D.1 –

- Develop and submit a procedure and tracking tool for verifying that the coalition is following its DEL-approved corrective action plan.
- Submit reports for the first quarter after report publication – no later than Wednesday, Nov. 12, 2025 – verifying that the coalition is continuing to implement its corrective actions regarding completing Tier 1 monitoring for 100% of the coalition's SR providers. Submit the tracking reports to DEL through the SharePoint corrective action plan folder for the 2024-2025 review on the Accountability Document Exchange.

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. Delivery of CCR&R Services

DEL 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.3; Rule(s) 6M-9.300, FAC*)

The coalition met all requirements for this criterion.

2. **The coalition provides CCR&R services without cost to the individual requesting services within two business days of the individual's request for services.** *(Rule(s) 6M-9.300(3)(b), FAC)*

The coalition met all requirements for this criterion.

3. **The coalition and the contracted CCR&R organization, if applicable, maintain a website and one other form of outreach and awareness within the coalition's service area that describes the services offered.** *(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 DEL, by the last business day in August, the CCR&R Accessibility Report, Family Engagement Plan and CCR&R ELC Staff List.** *(Rule(s) 6M-9.300(4)(a) and (10)(c), FAC; Grant Agreement, Exhibit II, section C.3.8 and Exhibit VI)*

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)(a), FAC)*

The coalition met all requirements for this criterion.

6. **The coalition accurately completed the CCR&R Staff List.** *(Rule(s) 6M-9.300(10)(c), FAC; Grant Agreement, Exhibit II, section C.3.3)*

Finding(s) –

Multiple submitted CCR&R ELC Staff Lists included an incorrect QAA date for one specialist.

DEL requires no further corrective action(s) –

CCRR-A.6 – The coalition submitted a corrected CCR&R ELC Staff List.

7. **The coalition completed a QAA for 50% of CCR&R staff members by Dec. 31, and for the remaining 50% by June 30.** *(s. 1002.92, F.S.; Rule(s) 6M-9.300(10)(d), FAC; Grant Agreement, Exhibit II, section C.3.9)*

The coalition met all requirements for this criterion.

8. **The coalition's written CCR&R policies and procedures follow rules, statutes and the Grant Agreement.** *(s. 1002.92, F.S.; Rule(s) 6M-9.300(11), FAC; Grant Agreement, Exhibit II, section C.3.10)*

Finding(s) –

The coalition's written CCR&R policies and procedures do not address serving providers, monitoring CCR&R program data and completing CCR&R customer intakes in the statewide information system. During the 2022-2023 accountability review, the coalition had a preliminary finding for this criterion due to the coalition submitting an incorrect prior version of its policies and procedures. In its response, the coalition stated it would consolidate documents into a single, comprehensive policy. DEL cannot determine whether the policies and procedures submitted for the 2024-2025 review are the coalition's current practices, as there is no date included on the documents.

The coalition completed the following corrective action(s) –

CCRR-A.8 – The coalition submitted a tracking procedure and a plan to update policies and procedures.

Recommendation(s) –

CCRR-A.8 –

- Submit the coalition’s updated written CCR&R policies and procedures that include serving providers, monitoring CCR&R program data and completing CCR&R customer intakes in the statewide information system.
- Submit CCR&R policies and procedures and the most recent tracking form to DEL during the first quarter after report publication – no later than Wednesday, Nov. 12, 2025.

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

DEL 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 customized child care listings, within two business days of the request, to each individual requesting services, and in the format the individual requested. (s. 1002.92(3)(a), F.S.; Rule(s) 6M-9.300(6) and (7)(a) and (b), FAC)**

The coalition met all requirements for this criterion.

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.3.7)**

Finding(s) –

The coalition’s CCR&R directory of community resources does not include information about child welfare and abuse.

DEL requires no further corrective action(s) –

CCRR-C.1 – The coalition submitted an updated CCR&R directory of community resources.

CCR&R-D. Provider Information

- 1. The coalition completes and approves, between Jan. 1 and May 31 of each calendar year, provider information for each legally operating provider. (Rule(s) 6M-9.300(8)(a), FAC; Grant Agreement, Exhibit II, C.3.5)**

The coalition met all requirements for this criterion.

CCR&R-E. Previous Corrective Actions

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

- 1. The coalition implemented its previous CCR&R corrective action plan. (Grant Agreement, Exhibit II, B.1 and F.8; 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 DEL-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

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

- 1. The coalition documented efforts to have all sampled children developmentally screened within 45 calendar days of the child's first day of attendance, 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), FAC; Grant Agreement, Exhibit II, C.5.5.1-5 and 5.5.9)**

The coalition met all requirements for this criterion.

- 2. The coalition has a process to verify that parents receive screening results. (s. 1002.84(5), F.S.; Rule(s) 6M-4.720(2)(e), FAC)**

The coalition met all requirements for this criterion.

- 3. The coalition initiated intervention within 30 calendar days of completion of developmental screenings for children showing concerning results, as Rule 6M-4.720(5), FAC, describes. (Rule(s) 6M-4.720(5), FAC; Grant Agreement, Exhibit II, C.5.5.7)**

The coalition met all requirements for this criterion.

- 4. 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)(b)(5), FAC; Grant Agreement, Exhibit II, C.5.5.7)**

The coalition met all requirements for this criterion.

ESD-B. Previous Corrective Actions

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

- 1. The coalition implemented its previous ESD corrective action plan. (Grant Agreement, Exhibit II, B.1 and F.8; and Exhibit III, B.1)**

This criterion is not applicable. The coalition had no previous findings in this review section.

IX. School Readiness Eligibility

DEL 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 DEL statewide information system information accuracy.

During the 2023-2024 fiscal year, the coalition served 3,576 children in the SR Program. Using the established risk assessment methodology, the review team examined 21 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 0.6% of the total SR children the coalition served. Six of the reviewed files contained one or more findings.

SR-A. Payment Certificate

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 a payment certificate at the initial eligibility determination and at each subsequent redetermination.

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

When a family applies for SR services through the Coalition Services Portal, the family attests to the rights and responsibilities and acknowledges that the coalition offered parental choice for child care providers.

- 1. The coalition has a completed payment certificate for each child.** (*45 CFR ss. 98.2 and 98.20(b); ss. 1002.84(8), 1002.82(8) and 1002.89(5)(c), F.S.; Rule(s) 4.200(6), FAC; CCDF State Plan 4; Grant Agreement, Exhibit II, C.5.1.6 and C.5.2.2*)

The coalition met all requirements for this criterion.

SR-B. Child Care Application and Authorization Forms (Referrals)

Several child care eligibility categories for SR services require a documented referral, as noted in DEL Program Guidance 250.01A. For all partner referral programs, a coalition shall have a documented referral and approve child care for the period the referral 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 certified homelessness shelter or a certified domestic violence center. It may also apply to children in the Relative Caregiver (RCG) Program if there is a referral.

- 1. The coalition has a complete and valid Child Care Application and Authorization (referral) Form for each applicable child.** (*45 CFR s. 98.20; Grant Agreement, Exhibit II, C.5.1.2 and C.5.1.4; CCDF State Plan 2 and 3; Rule(s) 6M-4.200(2), FAC*)

The coalition met all requirements for this criterion.

SR-C. Timely Delivery of Services for Priority Groups

A coalition's eligibility determination/processing shall be timely. The coalition must act on a referral within 10 calendar days from receiving the referral form for Temporary Assistance for Needy Families (TANF), Temporary Cash Assistance (TCA), Transitional Child Care (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 referral. Mark the monitoring tool as N/A if this section does not apply.

- 1. The coalition acted on the Child Care Application and Authorization (referral) Form within 10 calendar days of receipt.** (*s. 1002.87(1), F.S.; CCDF State Plan 3; Grant Agreement, Exhibit II, C.5.1.2*)

The coalition met all requirements for this criterion.

SR-D. Authorization Period

"Authorization Period" means the period the family is authorized to receive services once the family is determined to meet all the eligibility requirements. A family's eligibility for school readiness services depends on an established purpose for care. A coalition must authorize services in accordance with the family's purpose for care. Services shall be discontinued for a family prior to the end of the 12-month authorization period under limited circumstances. The family and provider will be notified of disenrollment at a minimum of two weeks prior to termination of services or at the end of the current authorization period, whichever comes first. The notification to the parent shall include the reason for termination.

- 1. The coalition established the correct authorization period.** (*s. 1002.81(2), F.S.; Rule(s) 6M-4.200(2)-(3), FAC; CCDF State Plan 2; Grant Agreement, Exhibit II, C.5.1.4.3*)

Finding(s) –

- **File No. 2** – The coalition listed two incorrect SR authorization periods. The coalition listed an SR authorization start date prior to eligibility determination and listed the authorization period for 12 months instead of listing the authorization end date to align with the TANF referral end date. After the TANF referral expired, the coalition incorrectly authorized a three-month period under an incorrect billing group, then authorized an additional 12 months.
- **File No. 12** – The coalition listed an eligibility authorization start date prior to the date the coalition determined eligibility. The child had not already been in care.

DEL requires no further corrective action(s) –

The coalition corrected the following file(s) – #2, 12

- 2. The coalition determined eligibility within 10 calendar days of receiving documentation for the initial determination or for redetermination.** (*Rule(s) 6M-4.208(4), FAC; Grant Agreement, Exhibit II, C.5.1.3*)

The coalition met all requirements for this criterion.

SR-E. 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 may accept a referral from Workforce for TANF/TCA recipients or an At-Risk referral form, if Medicaid eligible box is checked, as citizenship proof.

- 1. Prior to authorizing SR services, the coalition established and documented that each child is a U.S. citizen or qualified alien.** (*Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA); CCDF State Plan 3; Rule(s) 6M-4.208(4)(b), FAC; Grant Agreement, Exhibit II, C.5.1.4.6 and C.5.1.5*)

The coalition met all requirements for this criterion.

SR-F. Child Age Requirements

State and federal regulations require a child to be younger than 13 years to be eligible for the SR Program. However, Rule 6M-4.200(2)(a)6, FAC, 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 both the initial determination and the redetermination.** (*45 CFR 98.20 and 98.21(a)(1)(ii); s. 1002.87(1), F.S.; Rule(s) 6M-4.200(2)(a)6 and 4.208(4)(a), FAC; CCDF State Plan 3; Grant Agreement, Exhibit II, C.5.1.4.4*)

The coalition met all requirements for this criterion.

SR-G. Definition of a Parent

Rule 6M-4.200(1)(d), FAC, defines a parent as 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 order of a court.

Rule 6M-4.200(1)(f), FAC, defines "person who stands in loco parentis" as 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.

Each applicant must meet the definition of parent in Rule 6M-4.200(1), FAC, and submit a government-issued ID and documentation of guardianship verifying the relationship to the child.

- 1. The coalition established and documented the parent's identity and relationship to the child.** (*45 CFR s. 98.2; s. 1002.97(1), F.S.; Rule(s) 6M-4.200(1)(d) and (f) and 4.208(4)(d), FAC; CCDF State Plan 3*)

The coalition met all requirements for this criterion.

SR-H. 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 center 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.5.1.4.5)

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-I. Family Unit Income

An SR child file shall include documentation of all earned and unearned income that s. 1002.81(7), F.S., does not exclude and that the coalition used to determine a child's eligibility and establish the applicable parent copayment based on the sliding fee scale included in a DEL-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. DEL rules provide guidelines for verifying employment and income.

1. **There is appropriate documentation to fully support gross earned and unearned family income.** (s. 1002.81(7), F.S.; Rule(s) 6M-4.208(4)(f), FAC; CCDF State Plan 2.2.4 and 3; Grant Agreement, Exhibit II, C.5.1.4.7)

The coalition met all requirements for this criterion.

2. **The coalition correctly calculated gross earned and unearned household income.** (s. 1002.81(7), F.S.; Rule(s) 6M-4.200(1)(c) and (k) and 6M-4.208(4)(f)6, FAC; CCDF State Plan 2 and 3)

Finding(s) –

File Nos. 17, 20 – The coalition incorrectly calculated the family's income.

DEL requires no further corrective action(s) –

The coalition corrected the following file(s) – #17, 20

SR-J. Authorized Hours of Care

Authorized hours of care for all SR services shall meet the 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 on the amount of care the family needed.** (*ss. 1002.81(9) and (11), F.S.; Rule(s) 6M-4.200(2), (3) and (6), FAC; 45 CFR 98.21(g); Grant Agreement, Exhibit II, C.5.1.4.2*)

The coalition met all requirements for this criterion.

SR-K. Family Unit Size and Relationship

The coalition uses family unit size along with the family's gross annual income to determine whether 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(8), F.S.).

- 1. The coalition accurately determined family unit size and relationship.** (*s. 1002.81(8), F.S.; Rule(s) 6M-4.208(4)(e), FAC; CCDF State Plan 2 and 3; Grant Agreement, Exhibit II, C.5.1.4.8*)

The coalition met all requirements for this criterion.

SR-L. Income Threshold Requirements

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

- 1. The family unit size and household income met the income threshold requirement.** (*45 CFR s. 98.20(a)(2); ss. 1002.81(6-8) and 1002.87(1), F.S.; Rule(s) 6M-4.200, 6M-4.208 and 6M-4.400(3), FAC; CCDF State Plan 3; Grant Agreement, Exhibit II, C.5.1.4.9*)

The coalition met all requirements for this criterion.

SR-M. Assessed 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 DEL-approved coalition plan.

- 1. The coalition correctly assessed the parent copayment.** (*45 CFR s. 98.45(k); s. 1002.84(9), F.S.; Rule(s) 6M-4.400, FAC; CCDF State Plan 3.4; Grant Agreement, Exhibit II, C.5.1.4.10*)

The coalition met all requirements for this criterion.

SR-N. Parent 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 record the waiver on the referral or provide other written documentation requesting the fee waiver. In addition, a coalition may, on a case-by-case basis, waive the copayment for a child in a family whose income does not exceed the FPL or 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 or in an Early Head Start Program or Head Start Program).

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(9), F.S.; Rule(s) 6M-4.400(6), FAC; CCDF State Plan 3.3; Grant Agreement, Exhibit II, C.5.1.4.11)

Finding(s) –

File Nos. 5, 19 – The statewide information system did not include documentation justifying the parent copayment fee waiver. The coalition's approved SR plan states that this is the coalition's procedure.

DEL requires no further corrective action(s) –

The coalition corrected the following file(s) – #5, 19

SR-O. 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); Rule(s) 6M-4.208(4)(f), FAC; CCDF State Plan 2.2.2; Grant Agreement, Exhibit II, C.5.1.4.14)

The coalition met all requirements for this criterion.

2. **If applicable, 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 2.2.2)

Finding(s) –

File No. 2 – The coalition did not properly redetermine the family using the TCC referral once the TCA referral ended.

DEL requires no further corrective action(s) –

The coalition corrected the following file(s) – #2

SR-P. Billing Group Eligibility

Each family unit shall meet state requirements for the approved eligibility and billing group. DEL has established DEL Program Guidance 250.01A to categorize specific eligibility groups that are critical to the ability of DEL and its stakeholders to properly report on federal programs. Additionally, federal law requires a parent to have a purpose for care to receive funding. DEL 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; Grant Agreement, Exhibit II, C.5.1.4.12)

Finding(s) –

File No. 2 – The coalition assigned an incorrect billing group. The client was eligible as a BG5-TCC, but listed as BG8-ECON.

Recommendation(s) –

SR-P.1 file No. 2 – Process an adjustment in the statewide information system to reflect the correct billing group. Submit verification.

SR-Q. Statewide Information System Accuracy

The Grant Agreement requires a coalition to use the most current release of the DEL statewide information system. A coalition must use the DEL statewide information system to establish eligibility for child care funding. The DEL statewide information system must accurately reflect the most current household circumstances that the applicant presented to the coalition. The DEL statewide information system is the basis for reimbursement and federal and state reporting.

The review shall consist of comparing SR files against DEL 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 DEL statewide information system.** (s. 1002.82(2)(q), F.S.; Grant Agreement, Exhibit II, C.2, C.5.1 and C.5.1.4)

The coalition met all requirements for this criterion.

SR-R. Health and Safety Requirements

Section 1002.88(1)(c), F.S., requires program providers to maintain basic health and safety of their premises and facilities for the SR Program.

All SR 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 (as applicable) the ability to inspect all program premises, including access to facilities, personnel and records and to monitor and verify compliance with SR health, safety and training standards, pursuant to ss. 402.311(2) and 1002.82(2)(i), F.S.

Prior to participation in the SR Program, and annually thereafter, each SR 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 SR Program adopted under Rule 6M-4.610, FAC.

- 1. Each sampled SR provider received a health and safety inspection for compliance with statute and rule.** (*ss. 1002.82(2)(i), 1002.88(1)(c) and 1002.88(2)(b), F.S.; Rule(s) 6M-4.610(2) and 4.620, FAC; 45 CFR. s. 98.41; Grant Agreement, Exhibit II, C.5.10*)

The coalition met all requirements for this criterion.

SR-S. 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 with the coalition for the SR Program. A parent may choose from a variety of eligible child care types, including licensed, licensed exempt, registered, a child development program with accreditation from a national accrediting body and operates on a military installation that with United States Department of Defense certification, a provider who has received a provisional license under s. 402.309, F.S., or informal care. A provider may not deliver the program while holding a probation-status license under s. 402.310, F.S.

Rule 6M-4.620, FAC, states that the Department of Children and Families or the local licensing agency (as applicable) conducts inspections to determine compliance with SR 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. The coalition must terminate the provider contract of a SR Program provider who refuses entry or inspection. The rule requires SR providers to employ child care personnel who have satisfied the screening requirements of Chapter 402, F.S., and fulfilled DEL's training requirements.

- 1. The coalition had in place, with each sampled SR provider, a complete and fully executed DEL-SR 20 Statewide SR Provider Contract.** (*s. 1002.88(1)(q), F.S.; Rule(s) 6M-4.610, FAC; Grant Agreement, Exhibit II, C.5.3.2 and C.5.3.3*)

The coalition met all requirements for this criterion.

- 2. Each sampled SR provider serving children from birth to kindergarten entry met program assessment requirements.** (*Rule(s) 6M-4.740, FAC; Grant Agreement, Exhibit II, C.5.3.1*)

The coalition met all requirements for this criterion.

SR-T. SR Eligibility Policies and Procedures

Each early learning coalition shall base priority for participation in the SR Program on s. 1002.87, F.S. To participate in the School Readiness Program, parent(s) 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 whether the parent is potentially eligible, based on s. 1002.87(1), F.S. The coalition shall notify the parent if the applicant(s) meet 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 statute, 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.1.3 and C.2.1-2.6; CCDF State Plan 1.2.3 and 2.3.2*)

Finding(s) –

The coalition enrolled children into SR services from the Wait List out of compliance with the coalition's established local priorities. The coalition

- Enrolled several priority 7 children from the Wait List ahead of one priority 3 and several priority 6 children.
- Enrolled priority 6 children with Wait List placement dates later than other children in the same priority group.

The coalition completed the following corrective action(s) –

SR-T.1 – The coalition completed staff training.

Recommendation(s) –

SR-T.1 – Submit the coalition's updated Eligibility Manual as an amendment to the coalition's SR plan. Submit verification.

2. **The coalition's SR policies and procedures align with rules, statutes and the DEL Grant Agreement.** (*ss. 1002.81 and 1002.87, F.S.; Rule(s) 6M-4, FAC; Grant Agreement, Exhibit II.C.5*)

Finding(s) –

The coalition's DEL SR Eligibility Monitoring Process lists "Driver's License, Picture ID" under the "4.0 U.S. Citizen/Qualified Alien" section. These are not acceptable for documenting the child's citizenship/qualified alien status.

DEL requires no further corrective action(s) –

SR-T.2 – The coalition submitted an updated process.

3. **The coalition or its designee conducted internal file monitoring activities to verify accuracy of SR eligibility determinations.** (*Rule(s) 6M-4.208(1), FAC; Grant Agreement, Exhibit II, C.5.1.8*)

The coalition met all requirements for this criterion.

SR-U. Previous Corrective Actions

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

1. **The coalition implemented its previous SR corrective action plan.** (*Grant Agreement, Exhibit II, F.8 and Exhibit III, B.1*)

The coalition met all requirements for this criterion.

SR-V. SR 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)

DEL 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)

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

X. School Readiness Payment Validation

Using the established risk assessment methodology, the DEL team sampled 16 SR child files for payment validation for June, September and October 2024. The team also evaluated the records for absences based on DEL 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 DEL determines that a finding is due to a provider error rather than a coalition error, DEL will document the finding in the work papers, but not include it in the final report. However, the coalition must require the provider to correct the finding or implement corrective actions (if feasible).

1. The provider documented the child's daily attendance on a paper sign-in/sign-out form or electronic attendance-tracking system according to rule. (Rule(s) 6M-4.500, FAC; Grant Agreement, Exhibit I, II.4)

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

2. The certified attendance record matches the child's sign-in/sign-out sheets. (ss. 1002.82(2)(q) and 1002.89(5)(c)4, F.S.; Rule(s) 6M-4.500 and 6M-4.501, FAC; Grant Agreement, Exhibit II, C.2.1.3, 2.6 and 5.2.3)

The coalition met all requirements for this criterion.

- 3. If applicable, the provider maintained appropriate documentation to support excessive absences and at-risk child absences according to rule.** (*Rule(s) 6M-4.500(4), FAC; Grant Agreement, Exhibit II, C.5.2.3 and C.5.2.4*)

This criterion is not applicable. There were no recorded excessive absences for the files DEL sampled.

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 provider was eligible for Gold Seal differential payment during the sample period.** (*ss. 1002.85(2)(c)7 and 1002.945, F.S.; Rule(s) 6M-4.500(8), FAC*)

The coalition met all requirements for this criterion.

- 2. The coalition paid the SR provider reimbursement rates and fees correctly.** (*ss. 1002.84(17) and 1002.89, F.S.; Rule(s) 6M-4.500, FAC; CCDF State Plan 4.3; Grant Agreement, Exhibit II, C.4.2 through 4.4*)

Finding(s) –

File No. 10 – The provider’s SR contract does not list part-time rates in the Approved Provider Reimbursement Rate* PART TIME section, as required. Section 45 of the SR contract states, “Provider agrees to accept the approved provider reimbursement rate identified in Exhibit 5 of this Contract” The coalition, however, reimbursed the provider at the part-time services rate.

DEL requires no further corrective action(s) –

The coalition corrected the following file(s) – #10

- 3. The coalition documented that the payment cleared the coalition’s financial institution/bank.** (*ss. 1002.82(2)(s) and 1002.84(10), F.S.*)

The coalition met all requirements for this criterion.

- 4. The amount the coalition paid the provider matches the amount owed based on the closed reimbursement amount in the DEL statewide information system.** (*s. 1002.82(2)(s), F.S.*)

The coalition met all requirements for this criterion.

XI. Voluntary Prekindergarten Child Eligibility

VPK law requires DEL 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 2023-2024 fiscal year, the coalition served 1,809 children in the VPK Program. Using the established risk assessment methodology, the review team examined 16 VPK child files for compliance with the VPK Program. The sample represents 1% of the total VPK children the coalition served. Three 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 program year is eligible for the Voluntary Prekindergarten Education Program during either that program year or the following program year. Under s. 1002.53(2), F.S., the child remains eligible until kindergarten admittance or age 6 years by Feb. 1 of any program year.

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.** (s. 1002.53(2), F.S.; Rule(s) 6M-8.201(3)(a) and 6A-6.03033, FAC; Grant Agreement, Exhibit II, C.7.2)

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(2), FAC; Grant Agreement, Exhibit II, C.7.1.2)

The coalition met all requirements for this criterion.

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

A parent wishing to register a child in the Voluntary Prekindergarten Education Program must complete and submit Form DEL-VPK 01 (November 2021), titled Voluntary Prekindergarten (VPK) Education Program Child Application, through the single point of entry (known as the Family Portal) established under s. 1002.53, F.S. Beginning with the 2023-2024 program year, a parent wishing to register a child in the Voluntary Prekindergarten Education Program must complete and submit Form DEL-VPK 01A (November 2021), titled Voluntary Prekindergarten (VPK) Education Program Child Application, through the single point of entry.

If a parent wishes to register a child in the VPK SIS Program, the parent must complete and submit Form DEL-VPK 01A (November 2021), titled Voluntary Prekindergarten (VPK) Education Program Child Application, through the single point of entry.

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 DEL-VPK 02 (COE) or Form OEL-VPK 02S Part A and B (SIS COE and Schedule of Services). Both 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 Forms DEL-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 DEL statewide information system by recording an association between the child and the child's selected VPK provider. The provider will maintain Forms DEL-VPK 02 (COE) or OEL-VPK 02S Part A at the provider site.

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 DEL-VPK 01A/OEL-VPK 01S 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.7.1.6*)

The coalition met all requirements for this criterion.

2. **There is a completed, signed and dated Form DEL-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.7.1.3 and 7.1.4*)

While there were no coalition-related findings for this criterion, DEL documented observations associated with this criterion in the VPK child eligibility work papers.

VPKC-C. Reenrollment

The Grant Agreement, Exhibit II, C 7.2.1, requires the coalition to verify and document all child eligibility and reenrollment requirements as specified in Rule 6M-8.201, FAC, and Rule 6M-8.210, FAC. 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), 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 –

- **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 been enrolled for a portion of the VPK Program, but has not substantially completed the VPK Program.
 - The child has not previously reenrolled in the VPK Program.
 - The child's parent or guardian completes the Reenrollment Application (Form OEL-VPK 05) on the Family Portal by using personal means or with assistance available at an early learning coalition.
 - The child has one of the applicable circumstances listed in Rule 6M-8.210(3)(a)4, FAC.

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

- The child reaches 4 years old between Feb. 2 and Sept. 1 of the child's 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.7.2.1)

The coalition met all requirements for this criterion.

VPKC-D. Statewide Information System Accuracy

The Grant Agreement requires coalitions to use the statewide information system. Coalitions must use the DEL statewide information system to establish eligibility for child care funding. DEL statewide information system data must accurately reflect the most current household circumstances that the applicant presented to the coalition. DEL statewide information system data is the basis for reimbursement and federal and state reporting.

The review shall consist of comparing VPK files against DEL'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 DEL's statewide information system.** (Grant Agreement, Exhibit II, C.2)

The coalition met all requirements for this criterion.

VPKC-E. Eligibility Policies and Procedures

Section 1002.53(2), F.S., establishes the VPK Program for each child who resides in Florida who will reach the age of 4 years on or before Sept. 1 of the school year is eligible for the Voluntary Prekindergarten Education Program during either that school year or the following school year. The child remains eligible until the child 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 (DEL Grant Agreement, Exhibit II, C.7).

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.7.1. and C.7.2; Rule(s) 6M-8 and 6A-6.03033, FAC)

The coalition met all requirements for this criterion.

VPKC-F. Previous Corrective Actions

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

1. **The coalition implemented its previous VPKC corrective action plan.** (Grant Agreement, Exhibit II, B.1 and F.8; and Exhibit III, B.1)

This criterion is not applicable. The coalition had no previous findings in this review section.

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 and Exhibit IV, F*)

DEL 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*)

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

XII. Voluntary Prekindergarten Payment Validation

Using the established risk assessment methodology, the DEL team sampled 16 VPK child files for payment validation for June, September and October 2024. The team also evaluated the records for absences based on DEL 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 DEL'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. DEL 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 DEL determines that a finding is due to a provider error rather than a coalition error, DEL will document the finding in the work papers, but not include it in the final report.

1. **The coalition has completed OEL-VPK 02S Part B (Schedule of Services) for each child enrolled in the VPK Program, according to rule.** (*ss. 1002.66 and 1002.71(6), F.S.; Rule(s) 6M-8.500, FAC; DEL Grant Agreement, Exhibit II, C.7.2 and 3*)

This criterion is not applicable. None of the reviewed files contained a VPK SIS.

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, FAC; DEL Grant Agreement, Exhibit II, C.7.2 and 3*)

The coalition met all requirements for this criterion.

3. **The certified attendance record matches the parent's sign-in/sign-out sheets or Form OEL-VPK 03L.** (*s. 1002.71(6), F.S.; Rule(s) 6M-8.305, FAC; DEL Grant Agreement, Exhibit II, C.7.2 and 3*)

While there were no coalition-related findings for this criterion, DEL 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*)

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. **The coalition documented that the payment cleared the coalition's financial institution/bank.** (*s. 1002.73, F.S.*)

The coalition met all requirements for this criterion.

2. The amount paid to the provider matches the amount owed based on the closed reimbursement amount in the DEL statewide information system. (s. 1002.73 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 2023-2024 fiscal year, there were 75 VPK providers in the coalition's service area. Using the established risk assessment methodology, the DEL team sampled 59 VPK classroom director and instructor credentials and qualifications within 12 child care provider sites to establish whether all instructors met qualifications before the coalition authorized the instructors to enter the classroom. The sample represents 16% of the total VPK providers in the service area. Two of the instructor files reviewed contained one or more findings.

VPKP-A. VPK Provider Eligibility and Class Registration

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

The coalition must update forms annually, at a minimum –

- **Form OEL-VPK 10 (Statewide Provider Registration Application)** – A 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.

DEL 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; DEL Grant Agreement, Exhibit II, C.7.3.1)

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), 6M-8.300(2) and 6M-8.301(1), FAC; DEL Grant Agreement, Exhibit II, C.7.3.1*)

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 DEL-VPK 20 (Statewide VPK Provider Contract, including either Form DEL-VPK 20PP (Private Provider) or Form DEL-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 DEL-VPK 20) 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 the related 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 DEL 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 private school administrator who holds a valid certificate in educational leadership that the department issued satisfies the requirement for a prekindergarten director credential 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 DEL-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; DEL Grant Agreement, Exhibit II, C.7.3*)

The coalition met all requirements for this criterion.

2. **The coalition verified that each provider met the requirements for a legally operating provider prior to the provider delivering the VPK Program, and during the entire VPK Program year.** (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.; Rule(s) 6A-6.03033 and 6M-8.500(3)(a), FAC; DEL Grant Agreement, Exhibit II, C.7.3)

The coalition met all requirements for this criterion.

3. **The coalition verified that each private VPK provider, prior to offering VPK services, had a director with a valid director credential, and maintained the credential for the entire VPK Program year; and, if applicable, a VPK Director Endorsement or a private school administrator with a valid certificate in educational leadership that the Florida Department of Education issued.** (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. **The coalition verified that each lead instructor, prior to offering VPK services, met VPK credential requirements, and maintained the credential for the entire VPK Program year.** (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.; Rule(s) 6M-8.615, FAC)

The coalition met all requirements for this criterion.

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

The coalition met all requirements for this criterion.

6. **The coalition had documentation, prior to allowing the provider to offer VPK services, and while providing VPK services, that each VPK director, lead, substitute and secondary instructor for each class a provider offers had a current level 2 background screening clearance for the entire classroom period.** (ss. 435.04, 1002.55(3)(d)-(e), 1002.61(5) and 1002.63(5), F.S.; Rule(s) 65C-22.001 and 6M-8.410, FAC)

The coalition met all requirements for this criterion.

7. **The coalition obtained documentation that each VPK director, lead, substitute and secondary instructor for each class that a private provider offers had a signed and current Affidavit of Good Moral Character (AGMC) for the entire classroom period.** (ss. 435.04 and 1002.55(3)(d)-(e), F.S.; Rule(s) 6M-8.410 and 65C-22.001(7)(a), FAC)

Finding(s) –

File No. 8c – DEL did not receive documentation that the coalition verified that the instructor had an AGMC on file for the entire classroom period.

DEL requires no further corrective action(s) –

The coalition corrected the following file(s) – #8c

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

The department shall adopt a methodology for calculating each private and public school prekindergarten provider's performance metric. The department shall adopt procedures to annually calculate each private and public school prekindergarten provider's performance metric, based on the methodology adopted. DEL must calculate the program assessment composite score and performance metric for each private or public school prekindergarten site.

- 1. The coalition required and verified that all providers on probation (POP) (private and school district sites) had an approved provider improvement plan (PIP) prior to registering to offer VPK services for the next program year.** (ss. 1002.67 and 1002.68, F.S.; Rule(s) 6M-8.700(2) and 6M-8.701(2), FAC; DEL Grant Agreement, Exhibit II, C.7.4)

The coalition met all requirements for this criterion.

- 2. For all sampled VPK POPs, the coalition or school district approved or disapproved the PIPs within 14 days after receipt.** (s. 1002.67, F.S.; Rule(s) 6M-8.700 and 6M-8.701, FAC)

The coalition met all requirements for this criterion.

- 3. The coalition or school district required all sampled POPs to implement PIPs, according to rule.** (ss. 1002.67 and 1002.68, F.S.; Rule(s) 6M-8.700(2), 6M-8.605 and 6M-8.701(1) and (2), FAC; DEL Grant Agreement, Exhibit II, C.7.4)

The coalition met all requirements for this criterion.

- 4. VPK providers who failed to meet the minimum readiness rate for three consecutive program years received DEL approval for a good cause exemption, or the coalition removed the providers from delivering the VPK Program.** (ss. 1002.68(5)(d) and 1002.69(7), F.S.; Rule(s) 6M-8.603 and 6M-8.702, FAC)

The coalition met all requirements for this criterion.

VPKP-E. Voluntary Prekindergarten (VPK) Coordinated Screening and Progress Monitoring Compliance

Each private prekindergarten provider and public school participating in the Voluntary Prekindergarten Education Program must participate in the coordinated screening and progress monitoring program according to s. 1008.25(9), F.S. DEL will use the coordinated screening and progress monitoring program results to identify student learning gains, index development learning outcomes upon program completion relative to the performance standards established under s. 1002.67, F.S., and representative norms and inform a private prekindergarten provider's and public school's performance metric.

In addition, each private prekindergarten provider and public school in the Voluntary Prekindergarten Education Program must participate in a program assessment of each voluntary prekindergarten education classroom. The program assessment will measure, for children ages 3 to 5 years, the quality of teacher-child interactions, including emotional support, classroom organization and instructional support.

1. **The coalition verified that every private VPK Program provider administered the VPK Child Assessments, as rule requires.** (*Rule(s) 6M-8.620, FAC; s. 1002.68, F.S.; Grant Agreement, Exhibit II, C.7.4*)

The coalition met all requirements for this criterion.

2. **The coalition verified that every VPK provider completed the VPK Program Assessment requirements as rule requires.** (*Rule(s) 6M-8.620, FAC; s. 1002.68(1)(a) F.S.; Grant Agreement, Exhibit II, C.7.4.2*)

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 DEL single statewide information system. A coalition must use the statewide information system to establish eligibility for VPK services. The DEL 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 DEL's statewide information system.** (*Rule(s) 6M-8.300(c), FAC; DEL Grant Agreement, Exhibit II, C.2*)

Finding(s) –

File No. 9c-d –The statewide information system lists incorrect instructor start and end dates.

DEL requires no further corrective action(s) –

The coalition corrected the following file(s) – #9c-d

VPKP-G. Previous Corrective Actions (VPKP-G)

A coalition must submit a corrective action plan (CAP) response within 30 days to DEL's written notices of non-compliance findings 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.

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

- 1. The coalition implemented its previous VPKP corrective action plan.** (*Grant Agreement, Exhibit II, B.1, F.8; Exhibit III, B.1*)

This criterion is not applicable. The coalition had no previous findings in this review section.

VPKP-H. 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 DEL guidance. The coalition must submit the plan to DEL by Aug. 31 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, F.8; and Exhibit III, B.1*)

DEL 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*)

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

XIV. Data Accuracy

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

DA-A. Edit and Exception Reports

In compliance with the Division of Early Learning (DEL) Grant Agreement, Exhibit II, C.2, the early learning coalition shall comply with all DEL standard codes and definitions for all early learning programs. The coalition shall use the DEL-established single statewide information system for managing the single point of entry process and waiting list, tracking children's progress, coordinating services among stakeholders, determining child eligibility, reflecting child enrollment in the SR and VPK programs, tracking child attendance and streamlining provider administrative processes.

The review team will examine select edit and exception reports and abide by the guidelines and processes in this program guide. DEL will update the process as DEL revises, adds or discontinues reports. While reviewing these reports, DEL may identify instances that could result in questioned costs because information is missing, invalid or inaccurate that will require coalition follow-up and review team validation. The coalition shall comply with DEL data correction requests or data cleansing activities within the agreed upon time frames.

Reports may vary for each coalition –

- **Total Family Income Exceeds 85% of SMI** – Identifies families who are potentially ineligible or over income for SR services (does not apply to at-risk cases).
- **SR Duplicate Payments** – Identifies children (by name and DOB) who may have received more than one SR payment during the same service period.
- **VPK Duplicate Payments** – Identifies children (by name and DOB) who may have received more than one VPK payment during the same service period.

Based on the following statewide information system reports, the coalition complied with DEL requirements –

1. Total Family Income Exceeds 85% of SMI (*CCDF Plan 2.2.4 and 10; Rule(s) 6M-4.200(8)(e), FAC*)

The coalition met all requirements for this criterion.

2. SR Duplicate Payments (*CCDF Plan 10; DEL Grant Agreement, Exhibit II, C.2*)

The coalition met all requirements for this criterion.

3. VPK Duplicate Payments (*DEL Grant Agreement, Exhibit II, C.2*)

The coalition met all requirements for this criterion.

XV. Recommended Corrective Actions Summary Review

DEL 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)

CG-A.1 – Submit documentation of the coalition's board meeting minutes from August 2025 discussing governor appointee vacancies.

Operations and Program Management (OPM)

- **OPM-A.1** –
 - **Item 1** – Develop and submit a process to verify that all coalition and contracted staff complete a rescreening within five years of the most recent background screening date.
 - **Item 2** – Develop and submit a process to verify that the coalition obtains and maintains on file all contracted staff members' employment histories, if their positions require it.
- **OPM-C.2** –
 - **Item 1** – Develop and submit a process to verify that the coalition completed Tier 1 monitoring each program year for 100% of its contracted SR providers.
 - **Item 2** – Develop and submit an updated policy that states the coalition will monitor the minimum sample size of SR providers each fiscal year. The coalition should submit the updates to the SR Plans Section.
- **OPM-D.1** –
 - Develop and submit a procedure and tracking tool for verifying that the coalition is following its DEL-approved corrective action plan.
 - Submit reports for the first quarter after report publication – no later than Wednesday, Nov. 12, 2025 – verifying that the coalition is continuing to implement its corrective actions regarding completing Tier 1 monitoring for 100% of the coalition's SR providers. Submit the tracking reports to DEL through the SharePoint corrective action plan folder for the 2024-2025 review on the Accountability Document Exchange.

Child Care Resource and Referral (CCR&R)

CCRR-A.8 –

- Submit the coalition's updated written CCR&R policies and procedures that include serving providers, monitoring CCR&R program data and completing CCR&R customer intakes in the statewide information system.
- Submit CCR&R policies and procedures and the most recent tracking form to DEL during the first quarter after report publication – no later than Wednesday, Nov. 12, 2025.

Educational Services Delivery (ESD)

The coalition had no findings in this review section.

School Readiness Eligibility (SR)

- **SR-P.1 file No. 2** – Process an adjustment in the statewide information system to reflect the correct billing group. Submit verification.

- **SR-T.1** – Submit the coalition’s updated Eligibility Manual as an amendment to the coalition’s SR plan. Submit verification.

School Readiness Payment Validation (SRPV)_____

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

VPK Child Eligibility (VPKC)_____

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

VPK Payment Validation (VPKPV) _____

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

VPK Provider Eligibility (VPKP) _____

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

Data Accuracy (DA)_____

The coalition had no findings in this review section.