

BOARD OF DIRECTORS MEMBERSHIP QUESTIONNAIRE

EARLY LEARNING COALITION OF ESCAMBIA COUNTY

The Early Learning Coalition of Escambia County will use the information provided solely in connection with its review of your application for membership. Please note that Florida's public records law requires that all information received in connection with state business be made available to anyone upon request, unless there is a specific statutory exemption.

www.elcescambia.org

Early Learning Coalition of Escambia County - Board Membership Questionnaire

Section 1 – General Information

Applicant's Name: (Include name commonly used, please print)	Deirdre Patton
Email Address	psd@glrockbc.org
Mobile Telephone Number	850-375-0033
Current Employer:	Greater Little Rock Preschool
Current Occupation:	Preschool Director
Florida County of Residence	Escambia
Is this the first time you have applied to this Board?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
*Sex:	<input type="checkbox"/> Male <input checked="" type="checkbox"/> Female
*Race:	<input type="checkbox"/> White <input type="checkbox"/> Native-American/Alaskan Native <input type="checkbox"/> Hispanic-American <input type="checkbox"/> Asian/Pacific Islander <input checked="" type="checkbox"/> African-American
Do you now, or have you, within the last three years, been a member of any club or organization that, to your knowledge, in practice or policy, restricts membership or restricted membership during the time that you belonged on the basis of race, religion, national origin, or gender?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If so, detail the name and nature of the club(s) or organization(s), relevant policies and practices, and state whether you intend to continue as a member if you appointed to the Board of Directors

* This information will be used to provide demographic statistics on board membership.

Section 2 – Education and Background

The questionnaire MUST BE COMPLETED IN FULL. Answer “none” or “not applicable” where appropriate.

Business Address:	901 N. A Street Pensacola, FL 32501
Residence Address:	8734 Figland Ave Pensacola, FL 32534
Specify the preferred mailing address:	<input type="checkbox"/> Business <input checked="" type="checkbox"/> Residence
Since what year have you been a continuous resident of Florida?	1969

Education

High School:	Pine Forest High School	Year Graduated:	June 1987
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List all postsecondary educational institutions attended:

NAME & LOCATION	DATES ATTENDED	CERTIFICATES/DEGREES RECEIVED
Pensacola State College 1000 College Blvd	2008-2009	AS- Early Education
Pensacola State College 1000 College Blvd	2020-2022	BAS- Business Man.

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Military Service

Are you or have you ever been a member of the armed forces of the United States?

Yes No If "Yes" list:

- Dates of service: _____
- Branch or component: _____
- Date & type of discharge: _____

Background

Have you or members of your immediate family (spouse, child, parents(s), siblings(s), or businesses of which members of your immediate family have been owners, officers, or employees, held any contractual or other direct dealings during the last four (4) years with any state or local governmental agency in Florida, including the office or agency to which you have been appointed or are seeking appointment?

Yes No If "Yes", explain:

NAME OF BUSINESS	FAMILY MEMBER'S RELATIONSHIP TO YOU	FAMILY MEMBER'S RELATIONSHIP TO BUSINESS	BUSINESS' RELATIONSHIP TO AGENCY
N/A			

Early Learning Coalition of Escambia County - Board Membership Questionnaire

Have you ever been arrested, charged, or indicted for violation of any federal, state, county, or municipal law, regulation, or ordinance? (Exclude traffic violations for which a fine or civil penalty of \$150 or less was paid.)

Yes No If "Yes", please provide details:

DATE	PLACE	NATURE	DISPOSITION
May 1999	Escambia County	failure to disclose for public aid over \$200.	ADJ W/H by Judge
		type text here	(I am willing to provide additional information upon request.)

Has probable cause ever been found that you were in violation of Part III, Chapter 112, F.S., the Code of Ethics for Public Officers and Employees?

Yes No If "Yes", give details:

DATE	NATURE	DISPOSITION
N/A		

Section 3 – Experience

State your experiences and interests or elements of your personal history that qualify you for this position.

I have spent over 23 years working in early education, including the past 13 years as Director of Greater Little Rock Preschool. Throughout my career, I have overseen daily operations, staff development, DCF & ELC compliance, and program quality, while building strong relations with families and the community.

My experience has given me a clear understanding of the challenges providers face, including staffing, funding, while trying to maintain high-quality care. I have consistently worked to improve program standards and support both the children and educators.

I am very passionate about representing the provider perspective and contributing to decisions that strengthen all early learning programs. I want to make sure providers have a voice at the table.

List specially any degree(s), professional certification(s), or designations(s) related to the subject matter of this position:

Florida Child Care and Education Program Director Credential- VPK endorsed exp. 03/23/2029

Staff Management & Leadership Training

VPK Certified Instructor

List any awards or recognitions relating to the subject matter of this position:

N/A

Identify all association memberships and association offices held by you that relate to this position:

National Association for the Education of Young Children (NAEYC)

National Black Child Development Association (NBCDI)

Early Learning Coalition of Escambia County - Board Membership Questionnaire

Have you ever been elected or appointed to any public office in this state?

Yes No

If "Yes", state the office title, date of election or appointment, term of office, and level of government (city, county, district, state, federal):

OFFICE TITLE	DATE OF ELECTION OR APPOINTMENT	TERM OF OFFICE	LEVEL OF GOVERNMENT
N/A			

If your service was on an appointed board(s), committee(s), or council(s):

- How frequently were meetings scheduled: _____
- If you missed any of the regularly scheduled meetings, state the number of meetings you attended, the number you missed, and the reasons(s) for your absence(s).

MEETINGS ATTENDED	MEETINGS MISSED	REASON FOR ABSENCE
N/A		

Section 4 – Early Care and Education Partner Information

Are you a private child care partner or employee who receives funding from the Coalition in which you are applying for membership?

Yes No

If yes, are you:

For Profit Not for Profit Faith Based Other

Please list all services/programs for which you receive funding:

School Readiness (SR)

Voluntary Pre-Kindergarten (VPK)

TeenAge Parent Program w/ the Escambia County School District (TAPP)

Type text here

If you are a Voluntary Prekindergarten (VPK) partner or employee and you or your center receive funding for VPK: Did the most recent kindergarten rate for each program type (school year and/or summer) exceed the minimum kindergarten readiness rate established pursuant to s. 1002.69, F.S., for that program year?

Yes No Not Applicable

If yes, provide your latest Kindergarten Readiness Rate:

51- Above Expectations

If you are a VPK or School Readiness partner, did you submit accurate and timely monthly attendance roster for the VPK program in accordance with subsection 60BB-8.305(3), F.A.C?

Yes No Not Applicable

If you are a School Readiness partner, did you submit accurate and timely monthly attendance rosters for the School Readiness program?

Yes No Not Applicable

Are you accredited by a recognized agency?

Yes No Not Applicable

If yes, please list accrediting body:

ACCREDITING BODY	DATE OF ACCREDITATION
N/A	

If you are a VPK partner, have you ever been determined to be a Provider on Probation (POP) by the Florida Department of Education (FDOE)?

Yes No Not Applicable

A partner is not eligible for board membership if during the last 24 months, the partner:

- Submitted two or more consecutive, or a combined total of four or more, monthly attendance rosters 10 or more calendar days after the required submission date;
- Submitted two or more consecutive, or a combined total of four or more, monthly attendance rosters containing inaccurate reporting of a student's child's attendance; or
- Failed to repay an overpayment by the required repayment date after the Coalition discovered the overpayment and requested repayment; or
- Submitted a monthly attendance roster resulting in an overpayment that exceeded 20 percent of the payment for a calendar month due to the provider's inaccurate reporting of a student's child's attendance; or
- Submitted a monthly attendance roster containing fraudulent reporting or other intentional misreporting of a student's child's attendance; or
- Failed to comply with the terms of the Coalition's School Readiness Provider Agreement.
- Licensed by the Department of Children and Family Services or a local licensing agency is not eligible to if the provider's license status, as recorded in the department's Child Care Information System, is "Revocation Action Pending," "Suspension Action Pending/Suspended," or "Closed."
- A partner which is not licensed by the Department of Children and Family Services or a local licensing agency but which is accredited as described in s.1002.55(3)b., F.S., is not eligible if the provider's accreditation status has expired or been rescinded.

Section 5 -- References

List three persons who have known you well within the past five (5) years. Include a current, complete address, email address and telephone number. Exclude your relatives.

NAME	MAILING ADDRESS	ZIP CODE	PHONE NUMBER	EMAIL ADDRESS
Dr. Lonnie D. Wesley	1825 W. Gadsden St	32501	850-207-8904	pastor@glrockbc.org
Stephanie Richardson	1720 W. Fairfield Dr	32501	850-755-7177	SRichardson@ELC escambia.org
Sheila Green	1425 Kings Rd.	32533	850-377-4692	sheilabtq@att.net

Name any business, professional, occupational, civic, or fraternal organizations(s) of which you are now a member, or of which you have been a member during the past five (5) years, the organization address(es), and date(s) of your membership(s).

NAME	MAILING ADDRESS	OFFICE(S) HELD & TERM	DATE(S) OF MEMBERSHIP
N/A			

Do you know of any reason why you will not be able to attend fully to the duties of the office or position to which you have been or will be appointed?

Yes No If "Yes", explain:


If required by law or administrative rule, will you file financial disclosure statements?

Yes No

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CERTIFICATION

I Deirdre Patton (print name), have carefully and personally prepared or read the answers to the foregoing questions. The information contained in said answers is complete and true.


Signature

3-30-26
Date

Applicant must attach a resume or biography.

DEIRDRE PATTON

Pensacola, FL 32534

850-375-0033 - deirdrepattton69@gmail.com

PROFESSIONAL SUMMARY

Energetic Preschool Director with superior collaboration skills. Known for representing the perspective of teachers as well as parents in developing policies and curricula. offering 30 years in successful program development and management.

SKILLS

- Program assessment
- Personnel Training
- Facility Maintenance
- Policy creation
- Team Collaboration
- Regulatory Compliance

WORK HISTORY

10/2010 to Current **Director of Preschool**

Greater Little Rock Preschool – 901 N. A Street

- Provided training and professional development for teachers.
- Supervised childcare workers and oversaw facility to meet state requirements for education and training.
- Attended approved training and continuing education courses to maintain certifications.
- Observed and assessed classroom activities to verify conformity with quality standards.
- Conducted staff evaluations and provided constructive feedback, fostering professional growth and development.

03/1995 to 05/2013 **Assistant Director**

Englewood Early Education Center – 1240 W. Scott Street

- Used industry expertise, customer service skills, and analytical nature to resolve customer concerns and promote loyalty.
- Conducted regular safety drills to ensure preparedness in case of emergency situations at school premises.
- Tracked key business metrics and made recommendations for initiative-taking adjustments to policies and procedures.
- Assisted in organizing and overseeing assignments to drive operational excellence.

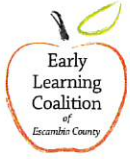
EDUCATION

05/2022 **Bachelor of Science: Business and Management**
Pensacola State College - Pensacola, FL

05/2008 **Associate of Science: Early Childhood Education**
Pensacola State College - Pensacola, FL

AFFILIATIONS

- National Association for the Education of Young Children (NAEYC)
- National Black Child Development Institute (NBCDI)



Office Policy and Procedures

Title: Use of Unrestricted Dollars

1.0 PURPOSE

The purpose of this policy is to establish clear governance guidance for the appropriate, responsible, and strategic use of unrestricted funds. This policy ensures that unrestricted dollars are used in a manner consistent with the organization’s mission, long-term sustainability, fiduciary duties, and approved strategic priorities.

2.0 DEFINITIONS

2.1 Unrestricted funds are financial resources that are not limited by donor-imposed stipulations or external legal restrictions and are available for use at the discretion of the Board of Directors and management, subject to this policy.

2.2 Unrestricted funds are intended to cover costs not allowed under our Federal, State and City awards. Unrestricted funds may be used for, but are not limited to, the following purposes:

- a) Food for family and childcare provider events
- b) Gift cards or prizes for family and childcare provider events
- c) Facility expenses that are not covered under our grants
- d) Coalition staff events
- e) Operating expenses for fundraising activities
- f) Operating costs tied to cash shortfalls, example line of credit interest

3.0 PROCESS

All uses of unrestricted dollars must follow normal coalition purchasing procedures and have the approval of the Executive Director.

Document Revisions

<i>Revision Date</i>	<i>Change Description</i>
May 14, 2026	Initial Approval

6M-4.720 Screening of Children in the School Readiness Program.

(1) Definitions. As used in this rule:

(a) "Concerns" means a child's scoring below established thresholds or age-appropriate levels suggested by the authors of a screening instrument.

(b) "Intervention practices" means the action taken subsequent to a child demonstrating concerns based on screening results.

(c) "Screener" means the individual responsible for conducting the developmental screening for each child.

(d) "Screening" means activities appropriate to a child's age to identify children who may have concerns and who may need early intervention practices as supports.

(e) "Screening Start Date" is the date of the child's enrollment into the School Readiness (SR) Program for parents or the child's first attendance at the School Readiness (SR) Program for providers after initial eligibility determination or after the annual redetermination date as described in Rule 6M-4.200, F.A.C. Notwithstanding the preceding, the provider's screening start date begins after the parent's timeframe to complete the screening has ended.

(2) Screening Process. Each early learning coalition must coordinate with parents and providers to complete an annual developmental screening for each child aged six (6) weeks to sixty (60) months who attends an SR provider. The parent of such a child may consent or decline the screening within the single statewide information system (SSIS).

(a) Upon parental consent, children must be screened using the screening instrument available through the SSIS and all required data must be entered into the SSIS by one of the following:

1. The parent within twenty (20) calendar days after the screening start date for parents. The early learning coalition must make staff persons available to assist parents during the screening, if requested.

2. The SR provider within forty-five (45) calendar days after the screening start date for providers, excluding state-observed holidays. The early learning coalition must provide electronic notice of each child the provider is to screen no later than 15 calendar days after each child's screening start date for providers. At a minimum, notification must include the screening start date for providers, the screening due date, and each child's name and date of birth. If a child transfers to a different SR provider, the early learning coalition must determine if the child has been screened in accordance with this subsection.

(b) This rule is not intended to limit the number of screenings offered to a child attending an SR provider.

(3) Screening Results. Screening results must be available to each parent no later than 15 calendar days after the screening due date. Each early learning coalition must provide or require the SR provider to provide screening results with concerns in writing to each child's parent. An early learning coalition must make staff persons available to explain screening results, if requested by a parent.

(4) Exceptions. Children meeting one of the following are exempt from the screening requirement:

(a) A child who was screened in a program other than the SR Program within the preceding 12-month period and whose scores were shared with the early learning coalition by the due date established in subsection (2); or

(b) A child who is receiving services in accordance with an Individualized Family Support Plan (IFSP) or Individual Educational Plan (IEP), if the plan was developed or reviewed in the last 12 months by a school district, early intervention program, or other state agency that provides special education and related services, and shared with the early learning coalition by the due date established in subsection (2).

(5) Early Identification and Referral.

(a) Each early learning coalition must initiate intervention practices no later than 30 calendar days after screening results are made available in accordance with subsection (3) and provide such data to the Florida Department of Education Division of Early Learning upon request. The intervention practices must include:

1. Concern analysis. The coalition must develop priorities, goals, and an action plan in collaboration with the provider to address the identified concerns. An example includes a documented description of the steps the provider and or family will take to address each concern.

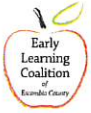
2. Intervention implementation. The coalition must implement interventions practices when there are areas of concern. Examples include coaching for the provider on making program accommodations and providing parent and teacher education.

3. Plan evaluation. The coalition must follow up to assess the intervention services provided. Examples include a review of the action steps to determine if revision to the analysis is necessary, if sufficient gains are made, or if a referral to other early intervention services or specialized care is needed.

4. Referrals to early intervention services or specialized care, if applicable. Each early learning coalition or SR provider, as appropriate, must notify in writing the parent of a child who receives a referral. The notification must include, at a minimum, areas identified through the screening that are of concern and local contact information for the appropriate referral agency. Each early learning coalition must offer to contact the appropriate referral agency. Either the coalition or SR provider must document the parent's choice of "yes" or "no" indicating the choice regarding receipt of additional help, the name of the parent, the date, and the child's name.

(b) A coalition must document intervention practices or referrals declined by a parent and inform the provider of the same.

Rulemaking Authority 1001.02 FS. Law Implemented 1002.84(5) FS. History—New 11-15-12, Amended 10-3-21, 3-26-26.



Early Learning Coalition of Escambia County Office Policy and Procedures

Title: Developmental Screening Process Policy and Procedure ELCEC 4300.1DE

1.0 PURPOSE:

Per Florida Statute 1002.84(5), Early Learning Coalitions must establish an age-appropriate screening for children ages ~~birth-6-weeks~~ to 60 months, of each child’s development and an appropriate referral process for children with identified delays. Such screening shall not be a requirement of entry into the school readiness program and shall be only given with parental consent.

2.0 SCOPE / IMPLEMENTATION:

The Division of Early Learning (DEL) in the Statewide School Readiness Provider Contract, Form DEL-SR 20, the Coalition can elect to have the Providers be “responsible for conducting developmental screenings for each child aged six weeks to 60 months in accordance with Rule 6M-4.720, F.A.C.” DEL encourages the parent/guardian to complete screening on their child, however, the parent/guardian has the option to defer the screening to their childcare provider. In the event the parent/guardian defers the screening, the Early Learning Coalition of Escambia County elects to have Providers conduct the development screenings and complete all reporting and documentation requirements associated with developmental screening process as delineated in this policy.

3.0 DECLINED CONSENT:

All parents/guardians shall be afforded the opportunity to Decline Consent for a developmental screening. For parent/guardians who decline consent for their child to be screened the parent/guardian must decline consent within their Family Portal in EFS MOD at the time of enrollment or redetermination. A parent/guardian’s screening decision remains in effect if a child changes School Readiness providers within the Coalition’s service delivery area.

4.0 PROVIDER DEVELOPMENTAL SCREENING PROCESS PROCEDURES:

The following are local implementation procedures and reporting requirements in accordance with Rule 6M-4.720, F.A.C.

4.1 Screening Tool: The Coalition uses the Brookes Ages and Stages Questionnaire for its developmental screenings.

4.1.2 Screening Start Date: The start date is the date of the child’s enrollment into the School Readiness (SR) Program for parents or the child’s first attendance at the School Readiness (SR) Program for providers after initial eligibility determination or after the annual redetermination date as described in Rule 6M-4.200, F.A.C. Notwithstanding the preceding, the provider’s screening start date begins after the parent’s timeframe to complete the screening has ended.

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Early Learning Coalition of Escambia County Office Policy and Procedures

4.24.3 Screening Requirements: Parents are given the first opportunity to screen their child. Parents are provided up to twenty (20) calendar days from the screening start date to complete the screening on their child. The parent must select to complete the ASQ-3 and/or the ASQ SE-2 unless the parent declines consent. If the parent selects both screenings be completed, both must be completed to show complete in EFS MOD and for the provider to be in compliance. If the parent selects only the ASQ-3 for completion, the ASQ SE-2 will not be initiated in EFS MOD. If a screening is deferred by the parent/guardian, all Providers shall complete screenings that are required by the deadline of either forty-five (45) calendar days from enrollment-the start date for the Initial screening or forty-five (45) calendar days from annual redetermination for the subsequent screening. **Note:** The provider 45-day deadline begins after the parent's timeframe has ended if parents choose to complete the screening; starts on the first day of attendance at the School Readiness Program after enrollment or first day of attendance after the annual redetermination if the parent defers the screening to the provider.

4.34.4 Screening Results Reporting Requirements: The results of all screenings shall be provided to the parent no later than 15 calendar days after the screening due date. Screenings without concerns shall be available to each parent upon completion of the development screening within the Family Portal. Screening results with concerns will be provided in writing to each child's parent by the Inclusion-Behavioral/Early Intervention Specialist upon completion of reviewing the screening.

4.44.5 Data Entry Requirement: The results of all screenings shall be entered ~~in to~~ into the Provider Portal no later than the screening due date.

4.54.6 Parent Notification: The results of all screenings shall be provided to the parent no later than 15 calendar days after the screening due date. Screenings without concerns shall be available to each parent upon completion of the development screening within the Family Portal. Screening results with concerns are placed in Coalition Reviewing status. The results will be provided in writing to each child's parent by the Inclusion-Behavioral/Early Intervention Specialist upon completion of reviewing the screening.

5.0 COALITION DEVELOPMENTAL SCREENING PROCESS PROCEDURES:

5.1 New Provider Training: For new Providers, the Coalition shall provide introductory training.



Early Learning Coalition of Escambia County Office Policy and Procedures

5.2 **Provider Notification:** Providers shall receive electronic notification of each child that must be screened via the Provider Portal. In the event the Provider Portal is non-operational, the Coalition shall provide written or electronic notification of each child that must be screened to providers no later than 15 calendar days after the screening start date. Notifications will be sent for all new enrollments and annual redeterminations via the Provider Portal.

5.3 **Post-Screening Procedures:** The ~~Inclusion and Behavior~~ Early Intervention Specialist shall review each screening in Coalition Reviewing status. These screenings indicate a child with concerns. Follow-up action should occur for any child whose score in a specific area is in the Monitoring and/or Below Cutoff zones. Follow-up action will be noted in the Screening Notes section and may include phone calls, emails, and/or observations. Children whose scores are above the Cutoff points do not require further assessment.

5.3.1 **Child Monitoring:** If a child scores in the Monitoring zone (the lightly shaded section of the bar graph), Providers may refer a child for further assessment, provide learning activities in that area of development, and/or monitor development in that area in the upcoming months. The Provider may also contact the Coalition ~~Inclusion and Behavior~~ Early Intervention Specialist for assistance.

5.3.2 **Child Referral Determination:** Total area scores that fall below the Cutoff indicate a need for further assessment (in the black section of the bar graph). The ~~Inclusion and Behavior~~ Early Intervention Specialist shall initiate intervention practices, no later than 30 calendar days after receipt of the screening results, for children who show concerns based on their screening results. Intervention practices must address the identified concerns. The ~~Inclusion- Early Intervention~~ Specialist shall not initiate a referral without first consulting with the parent and receiving their approval.

5.3.3. **Parent Referral Notification:** The Coalition shall notify in writing, or require a child care provider to notify in writing, the parent of a child who receives a referral. The notification must include, at a minimum, areas identified through the screening which are of concern and local contact information for the appropriate referral agency. The Coalition must offer to contact the appropriate referral agency. Either the coalition or the child care provider must document the parent's choice of "yes" or "no" indicating the choice regarding receipt of additional help, the name of the parent, the date, and the child's name. The Coalition shall document intervention practices or referrals declined by a parent. The Coalition shall notify the provider if intervention practices are declined by the parent.



Early Learning Coalition of Escambia County Office Policy and Procedures

5.3.4. **Individualized Supports:** The Coalition shall initiate individualized supports, no later than 30 calendar days after screening, for children who show concerns based on their screening results. Individualized supports must include:

1. Concern identification: identify areas of concerns using additional screening or assessment.
2. Concern analysis: develop priorities, goals and an action plan to address identified concerns.
3. Intervention implementation: implement intervention practices where there are areas of concerns by providing coaching parent and teacher education.
4. Plan evaluation: follow-up to assess the intervention services provided.
5. Referrals to early intervention services or specialized care.

5.4 **Provider Developmental Screening Process Compliance Monitoring:**

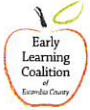
5.4.1 The Coalition will run a report daily in EFS MOD to check for any overdue incomplete developmental screenings. Screenings are due no later than forty-five (45) calendar days of the enrollment actual screening start date. EFS MOD indicates in RED any screening past its due date.

5.4.2 If it is determined that the developmental screening process was not completed as required, PIU will document the incomplete screening on a tracking log for compliance.

5.4.3 A non-compliance notification will be sent to the provider via email detailing what steps in the developmental screening process they need to complete to be in compliance and to provide a Correct Action Plan (CAP) to prevent reoccurrence. Providers shall be given 30 days to either contact PIU to dispute the validity of each instance of screening noncompliance, or to complete the outstanding requirements of the screening process and provide their CAP as described in the noncompliance notification.

5.4.4 If the developmental screening process was not completed, or the CAP was not received, by the due date issued in the Developmental Screening Noncompliance letter, payment will be disallowed for all children listed in the Developmental Screening Noncompliance letter beginning on the date of the letter and continuing until such time as all corrective requirements are met.

6.0 EXCEPTION: Children meeting one of the following are exempt from the screening requirement:



Early Learning Coalition of Escambia County Office Policy and Procedures

6.1 A child who was screened in a program other than the SR Program within the preceding 12-month period and whose scores were shared with the early learning coalition by the due date established in subsection 4.3; or

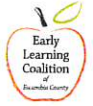
6.2 A child who is receiving services in accordance with an Individualized Family Support Plan (IFSP) or Individual Educational Plan (IEP), if the plan was developed or reviewed in the last 12 months by a school district, early intervention program, or other state agency that provides special education and related services, and shared with the early learning coalition by the due date established in subsection 4.3.

67.0 RECORDS RETENTION: Previous year's records will be retained for five years in accordance with the Coalition Records Retention Policy.

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Document Revisions

<i>Revision Date</i>	<i>Change Description</i>
June 8, 2017	Initial Approval
April 11, 2019	Change to comply with Rule 6M-4.720
December 9, 2021	Change to comply with Rule 6M-4.720
December 8, 2022	Edits to remove OEL references
<u>May 14, 2026</u>	<u>Change to comply with Rule 6M-4.720</u>



Early Learning Coalition of Escambia County Office Policy & Procedures

Title: School Readiness Program Assessment Implementation Policy ELCEC 4301.1~~CD~~

1.0 PURPOSE

~~Pursuant to Rule 6M-4.740 F.A.C.;~~ aAll School Readiness Providers serving children from birth to Kindergarten entry must have a program assessment conducted and meet the Contract Minimum Threshold to be eligible to participate in the School Readiness Program. The Coalition may waive ~~the contract minimum threshold~~this requirement if the Coalition determines that a Provider is needed to meet local child care capacity, as outlined~~essential to meet local child care capacity needs~~ as defined in the Coalition's School Readiness Plan.

2.0 DEFINITIONS

2.1 Definitions. The following definitions are applicable to implementation of Program Assessments of School Readiness Providers:

- a) "Care Levels" means the age group that makes up most (51% or more) of the children in a classroom. ~~refers to the age of the majority (51% or more) of enrolled children in a classroom. There are three care levels are used to meet the required~~for observations quota: Infant (ages 0-18 months), Toddler (ages 19-35 months), and PreK (ages 36 months-kindergarten entry.)
- b) "Classroom" means a clearly defined space where child care or learning activities take place for the School Readiness program. The space must be set up with materials and equipment for planned learning and allow children to learn without outside distractions. ~~refers to any well-defined room in which care is provided or classes are held; a room arranged with materials and equipment and set up as a learning space with intent to implement a plan of activities for the School Readiness program. The classroom provides a space where learning can take place uninterrupted by outside distractions. If the room does not have floor to ceiling walls, it must be separated by stable barriers that meet the requirements~~are not present, the classroom walls must be defined by stable barriers, and must adhere to the requirements for such barriers as established in Forms OEL-SR-6202, OEL-SR-6204, and OEL-SR-6206 as incorporated by reference in Rule 6M-4.620, F.A.C. Any space that may enroll School Readiness children at any time is considered a classroom. However, a space where School Readiness children are present for less than two hours per day is not considered a classroom under this definition. ~~Any classroom that is eligible to receive a School Readiness child enrollment at any time, is considered under this definition. Any classroom that serves children in the School Readiness program for less than two hours a day is not considered a "classroom" under this definition.~~
- c) "Composite Classroom" means is a School Readiness ~~provider~~ classroom randomly ~~selected~~chosen through the DEL-defined system to meet the composite score calculation requirements. It ensures that at least of50% of classrooms at each care level ~~is~~is served by the providerare included.
- d) "Composite Program Assessment Score" is the average of all scores from the approved

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~~assessment tool, excluding the negative climate score (if applicable), means an average of all DEL-adopted program assessment tool dimension scores, omitting the negative climate score, if included in the tool.~~

- e) ~~“Contract Minimum Threshold” means is the minimum score required by section 1002.82(2)(n), F.S., that a provider must achieve on a program assessment tool to be eligible to contract for the School Readiness Program.~~
- f) ~~“Early learning coalition” or “coalition” is the organization responsible for managing School Readiness program services. This also includes any DEL contractors that support this work. means the entity charged with administering school readiness program services pursuant to sections 1002.83 and 1002.84, F.S. “Early learning coalition” or “coalition” includes applicable DEL contractors.~~
- g) ~~“Negative Climate Score” means the measures of the level of expressed negativity shown by teachers and/or children in a classroom.~~
- h) ~~“Observer” means is a trained and certified reliable observer person who evaluates a classroom for a specific for the age group, of the classroom being observed, that meets the requirements of Form DEL-SR-740.~~
- i) ~~“Personnel” means is the director and all regular teachers entered into the DEL-defined system on the Class Roster and includes all instructional staff assigned to classrooms as including lead and assistant teachers. Instructional staff This does not include substitutes or others who fill in for an absent teacher or those who are temporarily in a classroom for a teacher break.~~
- j) ~~“Program Assessment” means is the measurement of the quality of how well teachers interact with children teacher-child interactions, including responsive caregiving, emotional and behavioral support, engaged support for learning, classroom organization, and instructional support for children.~~
- k) ~~“Quality Improvement Plan” means a targeted is a 12-month plan with goals and strategies to improve program quality, to improve program quality using performance goals and strategies.~~
- k)l) ~~“School Readiness Child care Slots” are the number of paid School Readiness children ages birth to kindergarten entry.~~

3.0 SCOPE AND IMPLEMENTATION

3.1 All School Readiness Providers serving children from birth to kindergarten entry must have a program assessment conducted ~~and meet the Contract Minimum Threshold to be eligible to~~ participate in the School Readiness Program. ~~School Readiness p~~Providers must receive a ~~minimum~~ composite ~~program assessment~~ score of 4.00 (rounding two decimals) ~~to participate in the School Readiness program~~, unless otherwise exempted.

3.2 The Coalition, and current and prospective Providers, shall follow the guidelines and meet all the requirements of the Program Assessment Requirements Handbook, Form DEL-SR 740. All parties are directed to refer to the Handbook for any requirements not otherwise reiterated, or otherwise stated, in this policy.



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3.3 Observer Requirements and Expectations for Observations shall be as stated in the Program Assessment Requirements Handbook.

3.4 Providers must electronically report in the DEL-defined system the number of classrooms as well as instructors and care levels assigned to those classrooms as outlined in the Program Assessment Requirements Handbook.

3.5 Providers must give consent in the DEL-defined system to Coalition staff or a third-party contractor to administer a program assessment for each selected classroom.

3.6 Providers that fail to complete Form DEL-SR 740 and/or does not give consent to administer the program assessment will not be eligible for a contract to provide School Readiness services.

4.0 EXEMPTIONS

4.1 Providers meeting one of the following shall be exempt from the annual program assessment requirement:

a) A Provider that has not received one Class I or more than three of the same Class II School Readiness health and safety violations as cited by the Department of Children and Families or local licensing agency, as applicable, in a two-year period and is a:

b) 1. A child care center with 20 percent or less of all filled-paid School Readiness child care slots out of the maximum capacity as defined in Forms OEL-SR-6202, OEL-SR-6204, and OEL-SR-6206 as incorporated by reference in Rule 6M-4.620, F.A.C.

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e) 2. Family child care homes with two or fewer of filled-paid School Readiness child care slots out of maximum capacity as defined in Forms OEL-SR-6202, OEL-SR-6204, and OEL-SR-6206 as incorporated by reference in Rule 6M-4.620, F.A.C.

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d)b) Providers that offer only overnight School Readiness services.

e)c) Providers that offer school-age only child care: If a school-age-only provider starts serving children from birth to kindergarten but doesn't need a new contract, they don't have to do a program assessment until at least 20% of their enrollment is in the new age group. Once 20% or more is reached, a program assessment is required.

f) Providers with no enrollment that have been determined by the Coalition to be essential in meeting local child care capacity needs.

4.2 A provider loses its exemption from program assessment when its paid School Readiness slots meet or exceed the exemption threshold during the operating hours of 7:00 a.m. to 6:00 p.m. or if the provider is cited for disqualifying health and safety violations. The coalition monitors providers' slots and health and safety violations monthly. If a provider no longer meets the exemption requirements, the coalition will notify them within 30 calendar days. To continue participating in the School Readiness program, the provider must complete a program assessment within 30 calendar days of notification to continue contracting for School Readiness services. When a provider's filled School Readiness child care slots meet

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~~or exceed the exemption threshold in paragraph 4.1(b) or (c), during the operating hours from 7:00 a.m. to 6:00 p.m., per its Provider type, the Provider shall no longer be exempt under this section. A Coalition shall monitor filled School Readiness child care slots monthly and notify a Provider within 21 calendar days if the Provider's filled slots meet or exceed the exemption threshold in paragraph 4.1(b) or (c). A Provider must receive a program assessment within 30 calendar days of notification to continue contracting for School Readiness services.~~

4.3 The exemptions in paragraph 4.1 ~~(b) and (c)~~ also apply to new Providers who have not yet enrolled children. However, once these exemption thresholds are surpassed then the requirements of paragraph 4.2 apply, and the Provider will be assessed.

4.4 Providers that are determined to be no longer exempt per Rule 6M-4.740 will remain non-exempt and shall have a program assessment conducted annually.

5.0 **FREQUENCY**

5.1 All participating School Readiness Program providers ~~shall~~will receive an annual program assessment prior to executing a School Readiness Contract, unless the provider is determined exempt by the coalition.

5.2 ~~If a provider is considered "new" and needs to sign a new School Readiness Contract, they can request to keep their most recent program assessment score instead of doing a new assessment. To do this, the provider must show that:~~ In the event of a change where the provider is considered a new provider and must execute a new School Readiness Contract per Rule 6M-4.610(4), F.A.C., prior to executing a new contract, the provider may request to retain the most recent composite program assessment score without having to conduct a new assessment if the provider can provide documentation to the coalition showing it has retained 80% of personnel listed in the DEL-defined system, and there is no change in capacity or classrooms from when the previous assessment was conducted for the remainder of the contract term. Examples of acceptable documentation include current payroll time sheets and evidence in CARES of monitored personnel during the pre-contractual health and safety inspection, classroom rosters, or attendance documentation. The coalition shall determine if the provider meets the requirements of this paragraph.

5.3 ~~Providers that achieve a composite program assessment score of 5.00 or higher (rounded by two decimals) shall have the option for a program assessment conducted biennially. The provider shall not receive one Class I or more than three of the same Class II School Readiness health and safety violations as cited by the Department of Children and Families or local licensing agency, as applicable, during the biennial period and must retain 80% of personnel listed in the DEL-defined system for the remainder of contract term to continue to have assessments conducted biennially. Biennial providers who receive a Class I or more than three of the same Class II School Readiness health and safety violations or drop below their 80% original personnel shall have their Quality Performance status reset to 'Annual' Program Assessments and be observed at the end of their year at least 60 calendar days prior~~

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~~to a contract renewal. Beginning with the 2023-24 School Readiness contract year, providers with a program assessment conducted biennially, shall no longer be exempt from annual program assessment requirements. Providers that have had multiple program assessments conducted shall use the most recent program assessment data for contracting purposes~~

5.54 Program assessments conducted during participation in other quality initiatives that meet requirements as defined in ~~Form DEL-SR-740;~~ the Program Assessment Requirements Handbook, may be used for meeting Contract ~~Minimum Threshold~~ requirements provided the assessment was conducted for the purpose of overall teacher/child interaction, is the most recent composite program assessment score is used, and the assessment was conducted within the fiscal year applicable for contracting and reduces duplication of effort.

6.0 ANNUAL PROGRAM ASSESSMENT PROCESS AND PROCEDURE

6.1 At least 60 calendar days prior to a contract execution or renewal, a provider must notify the Coalition of their desire to provide School Readiness services in the upcoming year.

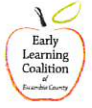
6.2 Upon the Coalition's request all Providers will register their current classrooms, their care levels, directors (both instructional and administrative) and instructors into the DEL-defined system.

6.3 Assigned Coalition staff will review and verify the Provider information in the DEL-defined system and provide technical assistance, if necessary. Verification includes, but is not limited to:

- i. Provider Name
- ii. Provider Address
- iii. Provider DEL ID Number
- iv. Primary Contact Information
- v. Provider's Early Learning Coalition
- vi. Capacity (as defined by Rule 6M-4.620, F.A.C.)
- vii. Number of children enrolled ages birth to Kindergarten entry
- viii. Number of SR children enrolled ages birth to Kindergarten entry

6.4 Verification is finalized upon entry into the Slot/Capacity spreadsheet to calculate exemption status. If exempt, an email notification is sent to the Provider.

6.5 Upon verification and approval of the Provider's information, assigned Coalition staff will notify the Provider via email of the observation two-week time frame, DEL-defined system classrooms/teachers selected for observation, and request feedback for scheduling the observation.



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6.6 Providers are allowed to choose up to three days in the two-week time frame that are not available for observation.

6.7 The window for observation should be agreed upon by the observer, the Provider and the teacher and should consider classroom schedules.

6.8 Observations will only be accepted from Coalition staff, DEL approved vendors or a Coalition designee.

6.9 Upon completion of the program assessment observation, the observer will enter notes and scores into the DEL-defined system within ~~72 hours~~ 5 business days (excluding Federal holidays)

6.10 The Coalition will notify the Provider of their composite score within 14 business calendar days using the following medium associated with the score they received:

- a) If the composite score is 4.00 or above, Provider will be notified by email that they have met the Contract Minimum Threshold for contracting.
- b) If the composite score is below 3.99 and below, Provider will be notified officially by email, preceded by personal contact that they have failed to achieve the Minimum Contracting Threshold. The Provider will be given the option of requesting a second assessment. The Provider is given 5 business days to inform the Coalition in writing if they would like to request a second assessment. If the second assessment is not requested, the Coalition will take action to terminate the provider contract. They will also be advised that action will be taken to terminate their contract School Readiness within 30 days.
- c) ~~Providers that have program assessment results that fall below the Contract Minimum Threshold will be placed on a Quality Improvement Plan for twelve (12) months if the coalition has determined the provider essential to meeting local child care capacity needs, as defined in the coalition's School Readiness Plan, required by Rule 6M-9.115, F.A.C.~~

Commented [DE1]: Our Coalition does not offer QIP's as local capacity is not an issue.

6.11 Individual classroom scores and notes shall be provided to providers within 10 calendar days upon written request by provider.

7.0 SECOND ASSESSMENTS

7.1 Providers that have been determined ineligible to contract based on their Composite Program Assessment Score may request one additional assessment that meets the requirements in the Program Assessment Requirements Handbook to be conducted at the

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Provider's expense by ~~an~~ approved DEL vendor, the Coalition or the Coalition's designee, if available. The results of the second assessment are final, and the Composite Program Assessment Score must meet the Minimum Contracting Threshold for the Provider to be eligible for a School Readiness contract. Should the provider select this option the Coalition shall provide coaching through the following processes:

- a) Provider & teachers shall view the 3 CLASS Coaching videos provided by the Coalition.
- b) Provider & teachers shall download and print the supplied PDF's to take notes while watching the coaching videos.
- c) Provider & teachers shall pass a quiz for each video with at least an 85.
- d) Once the Provider & teachers have passed the quizzes, the Operations Department will schedule informal observations.
- e) Operations will then base additional coaching and Teachstone supplied videos tailored to the CLASS Domains that have a low score.

7.2 Only previously assessed classrooms are eligible for reassessments. ~~If the same teacher is still in the classroom, the classroom is reassessed and its new score replaces the old score in the composite program assessment. If a new teacher is hired after the last assessment, the classroom is reassessed and the new score replaces the old score. If a teacher moves from another classroom, all affected classrooms are reassessed, and the new scores replace the previous scores in the composite. A single classroom will be reassessed if the teacher previously assessed is still actively teaching in the classroom being reassessed. If the previously assessed teacher is not active in the classroom and the new assigned teacher is hired after the previous assessment was completed, the single classroom will be reassessed. If the previously assessed teacher is not active in the classroom and the new assigned teacher was moved from a different classroom, every classroom will be reassessed for the new scores to replace the previous assessment scores.~~

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7.3 Providers must coordinate the second assessment request through the Coalition and provide payment prior to the assessment being scheduled and conducted. When requesting a second assessment from the Coalition, the Provider shall submit their request in writing, either by letter or email, and the request shall include the following:

- a) The Providers preference for the assessment to be conducted by an approved DEL vendor, the Coalition or the Coalition's designee, if available.
- b) If the Provider's preference is for the Coalition to conduct the second assessment, the Provider shall indicate whether they prefer to have the same observer conduct the second assessment.
- c) Although the Provider is asked to state their preference for who will conduct the second assessment, the Coalition shall decide if the assessment will be conducted by Coalition staff, a DEL approved vendor or a Coalition designee.



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- d) How many of the previously assessed classrooms the Provider wants to be reassessed. However, if the provider does not select all of the previously observed classrooms, then the second assessment will not be valid in terms of establishing eligibility for a School Readiness contract.
- e) Acknowledgement of the amount of payment and that payment must be received by the Coalition before the additional observations can be scheduled.

7.4 The cost for additional assessments to ~~paid for~~ paid by Providers ~~shall not exceed the cost for statewide contracted assessments is \$415 per classroom reassessed. This payment must be received before the second assessment is conducted.~~

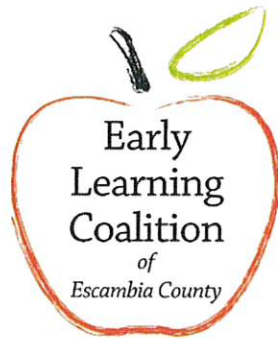
8.0 WAIVERS:

The ELC does not determine any provider be essential based on the community needs assessment, does not waive the contract minimum threshold for any provider, does not place any provider on a QIP, and does not have any additional local quality improvement strategies outside of the ones listed in the School Readiness contract

98.0 RECORDS RETENTION: Previous year's records will be retained for five years in accordance with the Coalition Records Retention Policy.

Document Revisions

<i>Revision Date</i>	<i>Change Description</i>
June 13, 2019	Initial Approval
December 9, 2021	Revised per Rule change
December 8, 2022	Revised per Rule change
<u>May 14, 2026</u>	<u>Revised per Rule change and in accordance with the Coalition School Readiness Plan</u>



**Revised Eligibility
Manual**

Attachment

B. Eligibility and Enrollment Policies and Procedures

Coalition Local Priorities

Describe the data source used to conduct the community assessment:

The *Escambia Children's Trust (ECT)* Community Needs Assessment collated information and assessments from various sources, including the Coalition, to create a tool that best defines the needs of the children of Escambia County. This Assessment is comprehensive and addresses the same issues that are of interest to the Coalition. Attached is the Escambia Children's Trust Needs Assessment dated September 2022 and updated 2024.

Priority Number	Priority	Describe how community needs are addressed.
3	An at-risk child who is at least 9 years of age but younger than 13 years of age. An at-risk child whose sibling is enrolled in the SR Program within eligibility priority categories 1, 2 & 6 shall have priority over other children who are eligible under this group.	Overall: The ELCEC policy is to serve whole families, if possible, maintain continuity of care as families transition between priority categories, and promote early education throughout. Priorities 3-9 reflect this policy. Priority 3: Our community wants our PS/At-Risk children, older and younger, to be served, particularly when it involves serving the whole family. Our partners serving PS children, DCF and CBC agencies, strongly advocate for this to be Priority 3.
4	A child of a parent who transitions from the work program into employment from birth to the beginning of the school year for which the child is eligible for admission to kindergarten in a public school.	Priority 4 means we recognize the importance of continued support for TANF "graduates" to be supported so they can sustain employment.
5	A child of a parent who transitions from the work program into employment who is younger than 13 years of age.	Serving older TCC children as the next priority after younger TCC children supports both our continuity of care and whole family policy, and the importance of continued support for TANF "graduates" to be supported so they can sustain employment.

6	<p>A child from birth to the beginning of the school year for which the child is eligible for admission to kindergarten in a public school, who is from a working family that is economically disadvantaged and may also include such child's eligible siblings, beginning with the school year in which the sibling is eligible for admission to kindergarten in a public school, until the beginning of the school year in which the sibling is eligible to begin sixth grade, provided that the first priority for funding an eligible sibling is local revenues available to a coalition for funding direct services. <u>Which also may include such child's eligible siblings, beginning with the school year in which the sibling is eligible for admission to kindergarten in a public school until the beginning of the school year in which the sibling is eligible to begin the six grade, provided that the first priority for funding an eligible sibling is local revenues available to a coalition for funding direct services.</u> A child eligible under this group ceases to be eligible if his or her family income exceeds 85% of SMI.</p>	<p>This is our first priority for providing care after we meet our commitment for providing continuity of care and serving whole families in the PS and TCC categories.</p>
7	<p>A child who is younger than 13 years of age from a working family that is economically disadvantaged <u>that has no priority 6 siblings.</u></p>	<p>Serving older BG8 children is the next priority after younger BG8 children. This supports both our continuity of care and whole family policy.</p>
8	<p>A child who has special needs, is eligible as a student with a disability, has a current individual education plan with a Florida school district, and is not younger than 3 years of age. A special needs child eligible under this paragraph remains eligible until the child is eligible for admission to kindergarten in a public school.</p>	<p>By providing continuous access to early learning services for children with disabilities who are at least three years of age, have a current Individual Education Plan (IEP) with a Florida school district, and are not yet eligible for kindergarten. This ensures inclusive services during a critical developmental period, prevents service gaps, and supports coordinated transitions to public school while promoting school readiness and equitable access.</p>
9	<p>A child who otherwise meets one of the eligibility criteria in priority groups 1,2,4,6 but who is also enrolled concurrently in the federal Head Start Program and the VPK Education Program.</p>	<p>By allowing School Readiness eligibility for children who meet priority group criteria and are concurrently enrolled in Head Start and the VPK Education Program, ensuring continuity of services. This coordination maximizes early learning resources, prevents duplication, and supports families' need for full-day, comprehensive care while promoting equitable access to early learning services.</p>



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Title: Anti-Fraud Plan

ELCEC 4101.1LM

1.0 PURPOSE:

The purpose of the Early Learning Coalition Anti-Fraud Plan is for the detection and investigation of possible acts of fraud, abuse, or overpayments by recipients and contracted providers relating to the provision of and payment for School Readiness and Voluntary Prekindergarten Programs. This plan will establish the procedures for reporting allegations of possible fraud, misfeasance, misapplication of funds, gross mismanagement, and employee/participant misconduct in the Early Learning Programs – School Readiness and Voluntary Pre- Kindergarten. To establish guidelines that ensure the Coalition identifies, processes and prevents suspected fraud, misrepresentation, overpayments and abuse by recipients and that recipients are fully aware of appeal rights and process.

2.0 SCOPE:

This policy applies to all recipients and providers that participate in Early Learning Programs, including School Readiness (SR) and Voluntary Prekindergarten (VPK). This plan will be submitted annually to the Florida Department of Education, Office of Inspector General (FLDOE OIG) Fraud Prevention Unit.

3.0 DEFINITIONS:

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

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

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

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

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

3.6 Overpayment: Payments for services made in excess of what a recipient was entitled to receive.

4.0 ASSOCIATED DOCUMENTATION:

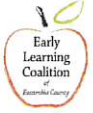
4.1 FAC 6M-9.400

4.2 FAC 6M-4.200

4.3 FAC 6M-4.400

4.4 F.S.S. 1002.9

5.0 RESPONSIBILITY / AUTHORITY:



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- 5.1 School Readiness Recipients are responsible for properly reporting employment, income, family size/living arrangements, address, and status of all children eligible for care. Additionally, they are responsible for properly reporting all changes affecting eligibility according to Rule 6M-4.200.
- 5.2 Voluntary Pre-Kindergarten Recipients are responsible for properly reporting their residence and child's age, and they shall maintain Florida residence throughout the VPK school year.
- 5.3 School Readiness and Voluntary Prekindergarten Providers are responsible for adhering to the terms and requirements of their respective contracts. Providers are responsible for ensuring they do not misreport attendance, sign documents for parents and otherwise submit false claims for reimbursement.
- 5.4 Providers are responsible for reporting suspected fraud committed by recipients. Suspected recipient fraud shall be reported to the Coalition in a timely manner, but no more than thirty days from detection of the suspected fraud.
- 5.5 The Coalition shall refer all suspected fraud to The FLDOE OIG through the Fraud Referral Database and either suspend or terminate any recipient that has been referred for suspected fraud except for valid at-risk referrals.
- 5.6 Detection, reporting and prevention shall be the responsibility of ELCEC staff, providers, parents, and the public. Once detected, the Executive Director shall be notified along with the Program Integrity Unit for further review.
- 5.7 The Operations Director will submit an electronic report monthly to the Executive Director and DEL of terminated recipients because of fraud, per Rule 6M.9.400 (b).
- 5.8 The Eligibility Director, Finance Director and Executive Director will annually review job descriptions and internal processes to confirm appropriate separation of duties is in place and review internal controls to reduce risk.

6.0 EDUCATION, AWARENESS AND TRAINING:

6.1 STAFF EDUCATION, AWARENESS AND TRAINING:

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

- 6.11 Staff will sign for receipt of the Employee Handbook covering Code of Conduct and Ethics, Whistleblower Policy, Workplace Conduct, and Conflict of Interest and Business Ethics.
- 6.12 The *Employee Code of Conduct* statement shall be signed by each employee annually.
- 6.13 Department Directors will provide all new staff training within thirty (30) days of hire to include, as applicable for duties assigned:
1. Client Applications and Forms, School Readiness Income Worksheet, Client Rights and Responsibilities.
 2. Authorization for release of information and other related documents related to fraud prevention.
 3. Recipient responsibility to report changes within fourteen (14) days of change and Coalition responsibility to implement, including acting on unreported changes, once discovered.



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4. Quality interviewing techniques during intake, redetermination, and when reporting changes.
 5. Eligibility staff are required to identify, verify and resolve case inconsistencies when inconsistencies occur.
 6. What to look for in an altered or falsified document.
 7. Identifying inconsistencies and errors in reimbursement paperwork.
 8. Reporting procedures for suspected recipient or provider fraud.
- 6.14 All staff shall receive mandatory fraud prevention and Whistleblower training annually.

6.2 SR and VPK PARENT EDUCATION and AWARENESS:

- 6.21 Display fraud awareness posters in interview rooms at ELC.
- ~~6.22 Recipient gives consent via Family Portal Account to the Early Learning Coalition and/or Department of Financial Services/Bureau of Public Assistance Fraud to make inquiries into all statements of information given. Include a fraud awareness statement in SR parent packets with ELC phone number to report any suspected fraud.~~
- 6.23 Recipient certifies, via Family Portal Account, that the information given is true and correct, must submit within 14 calendar days change in the circumstances related to address, temporary/non-temporary work or education, family size, failure to maintain attendance at a job training or education program and income that exceeds 85% of SMI. Family Eligibility Specialists will review responsibilities of parent in detail at interview, including importance of reporting changes in their circumstances with in fourteen (14) days.

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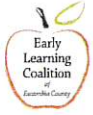
6.3 SR and VPK PROVIDER EDUCATION and AWARENESS:

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

6.4 PUBLIC EDUCATION AND AWARENESS:

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

7.0 RECIPIENT ANTI-FRAUD PLAN PROCEDURES:



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7.1 GENERAL PROCEDURES:

7.11 The Operations Director shall have the primary responsibility for implementing and coordinating the anti-fraud activities of the Coalition. The contact information for the Operations Director is:

Dawn Engel
1720 W. Fairfield Dr, Ste 100/400
Pensacola, FL 32501
850-332-6740

7.12 Monthly review, research, and follow up of data quality reports generated from Division of Early Learning by Eligibility Director.

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

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

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

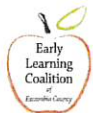
7.16 Monthly unscheduled internal reviews of work products for all departments will be conducted by Program Integrity Unit.

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

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

7.2 PROCESSING SUSPECTED RECIPIENT FRAUD:

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



Early Learning Coalition of Escambia County Office Policies & Procedures

authorizations to clients. If assigned, the PIU staff will brief the Operations Director/Fraud Investigator of their findings. The Fraud Investigator shall brief the Eligibility Director on the fraud referral and at that time will complete a Fraud Referral in the Fraud Referral System website. Note that the Coalition's fraud investigation and appeals procedures will complement the DEL referral process to Department of Financial Services through the Fraud Referral System.

7.3 SUSPECTED RECIPIENT FRAUD NOTIFICATION AND ~~PROCESSING~~DUE PROCESS:

7.31 Advance Notice - The Coalition shall provide written advance notice of the intended action to suspend or terminate~~ion benefits~~ to the recipient that clearly advises of the following information at least 14 days from ~~intent~~intended action-to-terminate-services, if services are still being provided:

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

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

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

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



Early Learning Coalition of Escambia County Office Policies & Procedures

1. Submit a written appeal to the Executive Director within 14 days of the written advance notice from the Coalition.
2. The appeal must fully describe the nature of the error in the fraud allegation and provide any backup documentation.
3. The letter from the recipient must be postmarked or emailed before the effective date of the intended action, or 14 days from the date of the Coalition's advance notification letter, whichever is earlier.
4. If the recipient fails to file an appeal in a timely manner the right to appeal will be waived.
5. If the recipient files an appeal in timely manner, services, if still being provided, shall not be suspended or terminated until the written decision of the Executive Director or the effective date of the intended action, whichever is later.
6. The Executive Director must respond to the appeal within 30 days with a decision if the suspension or termination will be upheld, modified or rescinded.

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

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



Early Learning Coalition of Escambia County Office Policies & Procedures

9. The appellant shall be notified in writing within ten days of the Appeal Committee's determination.
10. The determination of the Appeals Committee shall be final.

7.4 FOLLOW-ON PROCESSING OF REFERRED RECIPIENT FRAUD:

7.41 All background information gathered by the Coalition will be made available to FLDOE ~~OIG to~~ OIG to aid in an extended investigation. Coalition staff shall be available upon request for further action involving fraud cases such as court appearance.

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

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

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

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

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

7.47 Once BPAF has determined the case has been screened out, the ELC will refer to its Benefit Recovery Procedures.

8.0 PROCESSING SUSPECTED PROVIDER FRAUD

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

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

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

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

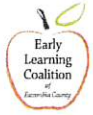
9.0 RECORDS RETENTION



Early Learning Coalition of Escambia County Office Policies & Procedures

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

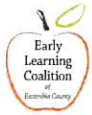
10.0 **ATTACHMENTS:** Coalition Fraud Plan Organizational Structure
Benefit Recovery Procedure



Early Learning Coalition of Escambia County Office Policies & Procedures

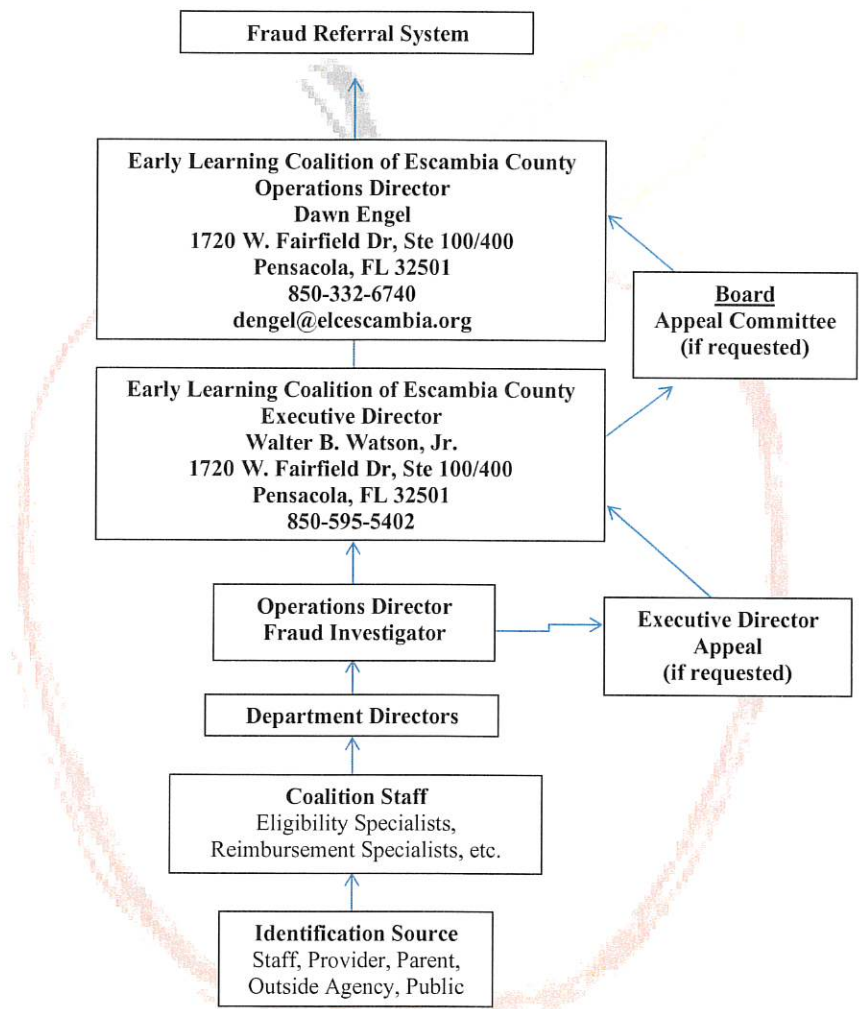
Document Revisions

<i>Revision Date</i>	<i>Change Description</i>
<i>December 11, 2014</i>	<i>Initial Board Approval</i>
<i>June 10, 2015</i>	<i>Reviewed, no revisions</i>
<i>February 11, 2016</i>	<i>Add Provider Fraud Policy, Amend other policy</i>
<i>October 13, 2016</i>	<i>Add Advance Notice Translation note</i>
<i>June 8, 2017</i>	<i>Revision to reporting and termination process</i>
<i>October 23, 2017</i>	<i>Revision to contacts and compliance with Rule</i>
<i>June 14, 2018</i>	<i>Annual update, revision to contacts</i>
<i>June 13, 2019</i>	<i>Annual review and approval, no changes</i>
<i>June 11, 2020</i>	<i>Annual Review and updates for ELC reorganization</i>
<i>June 9, 2022</i>	<i>Revisions to address of Coalition</i>
<i>December 8, 2022</i>	<i>Revisions to reporting and DEL name change</i>
<i>June 8, 2023</i>	<i>Annual review and approval, no changes</i>
<i>June 13, 2024</i>	<i>Annual review and approval, no changes</i>
<i>August 8, 2024</i>	<i>Revision removing outdated Benefit Recovery Processes</i>
<i>May 8, 2025</i>	<i>Revisions adding Overpayment Payment Processes and Approval</i>
<i>May 14, 2026</i>	<i>Annual Update and revisions updating language</i>



Early Learning Coalition of Escambia County Office Policies & Procedures

Fraud Plan Organizational Structure





Early Learning Coalition of Escambia County Fee Waiver Policy and Procedure

Title: Fee Waiver Policy and Procedure

1.0 PURPOSE: This policy is required to insure ensure practices and policy application regarding fee waivers for parents, relatives, non-relatives, and foster parents who have At-Risk or Non-At-Risk children and are in compliance with related DEL, State, and Federal Regulations.

2.0 SCOPE: This policy applies to all eligible parents, relatives, non-relatives, and foster parents that have At-Risk or Non-At-Risk children in receiving temporary fee waivers.

3.0 DOCUMENTATION: For parents who have faced a hardship or have experienced an emergency, they must provide documentation of the emergency or hardship, including their current income, to show proof of hardship. For At-Risk relatives, non-relatives, and foster parents, the referral is proof the child is placed with an out-of-home guardian and also lists the biological parent's information (if available).

4.0 RESPONSIBILITY / AUTHORITY: The Eligibility Specialist is responsible for determining if the parent qualifies for a temporary Parental Fee Waiver. The Eligibility Specialist is responsible for determining if the parent, relative, non-relative, or foster parent qualifies for a temporary Out of Home Fee Waiver. The Eligibility Director is responsible for final approval of the fee waiver.

5.0 PROCEDURES:

For At Risk Parents:

For At-Risk Parents, if no Fee Waiver Form is provided, the standard parent co-payment will be assessed. If the parent is employed, they must submit income documentation, and the co-payment will be assessed based on that income. If the parent reports income but does not provide documentation, the parent co-payment will be assessed at 85% of the State Median Income (SMI). Once the parent submits the required income documentation, the co-payment will be adjusted accordingly, if applicable.

Parent has been identified as meeting the following criteria in receiving a temporary Fee Waiver

- a.) Parent(s) are in the hospital or residential treatment facility.
- b.) Parent(s) are unemployed.
- c.) Parent(s) are unable to work due to illness or incapacitation.
- d.) Death of a parent.
- e.) Parent(s) are homeless or living in a shelter.
- f.) Parent(s) are over-extended or a type of financial hardship
- g.) Parent(s) experienced an emergency (i.e. natural disaster, fire, etc.)

Once the Eligibility Specialist has determined if a parent meets any of the following criteria, he/she will complete the Request for Coalition Waiver form and include documentation of hardship, emergency, parent's total income etc.

Request for Coalition Waiver form and supporting documentation is submitted to Eligibility Director for final approval.

Once the fee waiver has been approved, the form and supporting documentation are uploaded to the client's EFSM file.

Eligibility specialist will contact the parent and provider via phone and email with new parental fee and time limit of this fee.

At end of the time-period, Eligibility Specialist will terminate the reduced parental fee and reassess the new parent fee and a new payment certificate will be issued to the parent and provider.

For At Risk Relatives/Non-Relatives/Foster Parents:

For At-Risk Relatives, Non-Relatives, and Foster Parents, only the child's income is counted when assessing the co-payment. If the Relative, Non-Relative, or Foster Parent reports the child income but does not submit the required documentation, the co-payment will be assessed at 85% of the State Median Income (SMI). Once the Relative, Non-Relative, or Foster Parent submits the income documentation, the co-payment will be adjusted accordingly, if applicable.

Relatives, non-relatives, and foster parents are eligible for a waived parental fee if the parent meets any of the following criteria:

- a.) Parent(s) are incarcerated.
- b.) Parent(s) are in the hospital or residential treatment facility.
- c.) Parent(s) are unemployed.
- d.) Parent(s) are unable to work due to illness or incapacitation.
- e.) Death of a parent.
- f.) Parent(s) are homeless or living in a shelter.
- g.) Parent(s) are over-extended or type of financial hardship
- h.) Parent(s) experienced an emergency (i.e. natural disaster, fire, etc.)
- i.) Whereabouts of parent(s) are unknown.
- j.) Parental rights have been terminated (TPR).

For Non At Risk Parents:

Parents are eligible for a waived parental fee if the parent meets any of the following criteria:

- a.) Parent(s) who are experiencing financial hardship such as loss of employment
- b.) Parent(s) who experienced emergency (such as ~~natural inability~~ natural disaster, fire etc.)
- c.) Parent(s) have not entered the gradual phase out period and parent fee cannot be increased.
- d.) Homeless shelter/living arrangements.
- e.) The parent participation in a parenting class or in an Early Head Start Program or Head Start Program.

The Eligibility Director will give final approval for At-Risk and Non At Risk parents, guardians, and relatives. If the fee waiver request is denied, the Eligibility Director will enter the reason on the appropriate fee waiver form and in case notes in the EFSM parent file.

If the Fee Waiver has been approved, the Eligibility Specialist will enter the reduced or waived fee into EFSM in the Eligibility Assignment Screen.

The Eligibility Specialist will upload the approved fee waiver to the parents file in EFSM.

The Eligibility Specialist will enter case notes in the client EFSM file.

References

Rule 6M-4.400, Florida Administrative Code (F.A.C.) – Required Parent Co-payment
Section 1002.84(9), Florida Statutes – School Readiness Program Accountability

<u>Revision Date</u>	<u>Change Description</u>
<u>02/13/2025</u>	Added to the ELC School Readiness Eligibility Policy & Procedure Manual
02/20/2025	Updated & added policy for at-risk families that do not have income documentation and References
05/14/2026	Updated policy and removed natural inability

**DESCRIPTION OF INTENDED
SINGLE SOURCE PURCHASE
(PUR 7776)**

AGENCY: Early Learning COalition of Escambia County

TITLE: TORCH Talent Online Professional Learning Platform

Short description of the commodity or service desired: TORCH Talent is a secure, online, cloud-based professional learning platform that, enables schools and organizations to support educator growth throughout the entire development cycle for assessment, observation, feedback, goal-setting, and coaching.

CONTACT

Name: Dawn Engel

Address: 1720 W. Fairfield Drive Suite 100/400, Pensacola, FL 32501

Telephone: 580-332-6740

Email: dengel@elcescambia.org

Internal tracking number, if any: 4-22-2026

Date posted: 4/22/2026 Last day for receipt of information: 5/12/2026

This description of commodities or contractual services intended for purchase from a single source is posted in accordance with Sections 120.57(3) and 287.057(3), Florida Statutes (F.S.), and will remain posted for a period of at least 15 business days.

Commodity or Contractual Service Required (commodity or United National Standard Products and Services Code (UNSPSC), manufacturer, model, and description, as appropriate):
TORSH Talent online professional learning platform.

Quantity or Term (as appropriate):

For quality and term please contact Dawn Engel

Requestor (division, bureau, office, individual, as appropriate):

Operations Department

Performance and/or Design Requirements (e.g. intended use, function or application, compatibility, requirements; reference to policy, rule, statute or other act of the Legislature, etc., as appropriate):

The requirement is for a secure, online, cloud-based professional learning platform that, enables schools and organizations to support educator growth throughout the entire development cycle for assessment, observation, feedback, goal-setting, and coaching. The platform must help schools and organizations increase educator instructional capacity, improve the delivery of educator professional development, and generate insights into educator effectiveness.

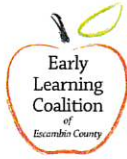
Intended Single Source:
TORSH, Co

Estimated Dollar Amount:
\$25,412.00

Justification for single source acquisition (what is necessary and unique about the product, service or source; steps taken to confirm unavailability of competition, as appropriate):
TORSH, Co is the sole source provider of the TORSH Talent online professional learning platform in the United States and the rest of the world. TORSH maintains all intellectual property rights to the TORSH Talent Platform and said platform must be purchased directly from TORSH as there are no agents or dealers authorized to represent or sell TORSH Talent.

Approved By (names & titles, as appropriate, e.g., requestor, requestor management, information systems, budget, purchasing):
Dawn Engel, Operations Director
Al Henderson, Executive Director

Prospective vendors are requested to provide information regarding their ability to supply the commodities or contractual services described. If it is determined in writing by the agency, after reviewing any information received from prospective vendors, that the commodities or contractual services are available only from a single source, the agency shall provide notice of its intended decision to enter a single-source purchase contract in the manner specified in Rule 60A-1.045, Florida Administrative Code, and section 120.57(3), F.S.



Early Learning Coalition of Escambia County

1720 W. Fairfield Dr. Suite 100/400
Pensacola, FL 32501



Executive Summary

Auto Insurance: Community Outreach Vehicle

The Progressive Commercial Auto Insurance policy will cover the 2026 Ford Van with drivers listed as Melissa Jennings and Skye Lindsey for liability and property damage associated with the operation of this vehicle for business use. The policy will only extend to the vehicles and drivers listed on the policy.

Commercial Auto Insurance

Progressive Insurance

2026 Ford Transit

Proposed Effective 4/27/26-4/27/27

Policy Number: 872948533

Coverage:

Bodily Injury / Property Damage: \$1,000,000 Combined Single limit

Uninsured Motorist – Non-Stacked \$300,000

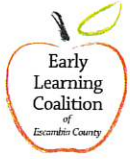
Personal Injury Protection: \$10,000

Medical Payments- \$5,000 per person

Comprehensive / Collision Deductibles: \$500

Roadside Assistance Included

Annual Premium: \$5,844



Early Learning Coalition of Escambia County

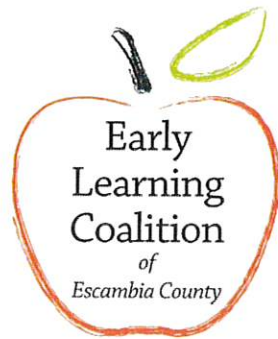
1720 W. Fairfield Dr. Suite 100/400
Pensacola, FL 32501



Executive Summary

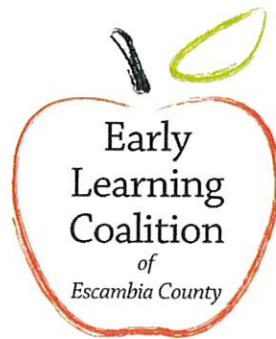
Auto Insurance: Hired and Non-Owned Auto Insurance

The ELC of Escambia County seeks coverage for all hired and non-owned auto exposures in which employees rent or use their personal vehicles for business use. This would include driving to visit work sites, incidental errands, car rentals while out of town, etc. Final terms and rates are pending and will be forwarded upon receipt of all quotes.



**Higginbotham
Property and
General Liability Insurance**

Attachment



CRI
Completed Audit

Attachment

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purposes only.
Not for outside distribution.

**Independent Accountants' Report on
Financial Monitoring Results**

**Early Learning Coalition of Escambia County, Inc.
(ELC 01)**

2025-26 Financial Monitoring Report for FY 2024-25
Period Reviewed: October 1, 2024 – June 30, 2025

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**Independent Accountant’s Report on
Financial Monitoring Results
Early Learning Coalition of Escambia County, Inc. (ELC 01)
2025-26 Financial Monitoring Report for FY 2024-25
*Period Reviewed: October 1, 2024 – June 30, 2025***

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NEED DATE

State of Florida Department of Education
Division of Early Learning
Tallahassee, Florida

We have performed specific financial compliance consulting services as approved by the Florida Department of Education Division of Early Learning (DEL) for the Early Learning Coalition of Escambia County, Inc. (the ELC). These services were contracted by the DEL to comply with its oversight and monitoring responsibilities as outlined in applicable federal regulations and program guidance:

- 45 Code of Federal Regulations (CFR) § 75.342(a), *USDHHS, Monitoring and reporting program performance,*
- 2 CFR § 200.329(a), *Monitoring and reporting program performance,*
- 2 CFR § 200.332(d), *Requirements for pass-through entities,* and
- Chapter 1002.82(2)(s), *Florida Statutes (F.S.), Dept. of Education; powers and duties.*

These consulting services were conducted in accordance with the Statement on Standards for Consulting Services (SSCS) established by the American Institute of Certified Public Accountants. DEL is solely responsible for the sufficiency of the procedures performed. Consequently, we make no representation regarding the sufficiency of the procedures performed, either for the purpose for which this report has been requested or for any other purpose.

We performed financial compliance consulting services over the ELC (the subrecipient) as summarized in the approved financial monitoring tool. Detailed descriptions of our findings and observations begin on page 4 of this report.

These consulting procedures were not designed to express an opinion on the business, operational, and internal control risks associated with the ELC's compliance with the previously described financial management standards as outlined in applicable Office of Management and Budget Uniform Grant Guidance, Code of Federal Regulations, or other state and federal requirements. Accordingly, we do not express such an opinion. Additionally, because of inherent limitations of internal control systems, the procedures performed should not be relied upon to prevent or detect errors or fraud associated with grant related revenues or expenditures. Had we performed additional procedures, other matters might have come to our attention that would have been reported to DEL.



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This report is intended solely for the information and use of DEL and DEL's management and is not intended to be and should not be used by anyone other than these specified parties.

Thomas Howell Ferguson P.A.
Tallahassee, Florida

Early Learning Coalition of Escambia County, Inc. (ELC) 2025-26 Financial Monitoring Report for FY 2024-25
Period Reviewed: October 1, 2024 – June 30, 2025

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Summary Table of Financial Monitoring Results

Category	Finding(s)	Observation(s)
1.0 – Preventive/corrective action plan (PCAP) implementation ¹	N/A	N/A
2.0 – Financial management systems	-	-
3.0 – Internal control environment	-	-
4.0 – Cash management	-	-
5.0 – DEL’s statewide information system ¹	N/A	N/A
6.0 – Prepaid program items	-	-
7.0 – Cost allocation and disbursement testing	-	-
8.0 – Travel	-	-
9.0 – Purchasing	1	-
10.0 – Contracting	-	-
11.0 – Subrecipient monitoring	-	-
Total	1	-

¹ - For 2025-26 monitoring for FY 2024-25, testing of this objective is not included in the scoped financial monitoring tasks. This objective is shown for disclosure purposes only.

Definitions Applicable to Financial Monitoring

1. Finding – A high risk issue that directly impacts integrity or effectiveness of financial operations or could potentially result in major financial deficiencies or noncompliance (e.g. lack of accounting records or no system of accounting, no documentation to support expenditures, lack of internal controls, lack of fully executed contracts, issues indicative of systemic problems in financial operations, has the appearance of fraud or abuse, potential questioned costs, etc.) Findings are expected to be responded to in the Preventive/Corrective Action Plan (PCAP).

2. Observation – A low risk issue that is intended to offer constructive comments and an opportunity to improve current local practices, processes, and procedures that result in positive financial or compliance outcomes. Observations are not expected to be responded to in the PCAP except when requested.

Financial Monitoring Results

We performed financial compliance consulting services as approved by the Florida Department of Education Division of Early Learning (DEL). Our procedures were performed using firm and professional standards. The results of financial monitoring testing are described below.

Findings

Finding #01 – Small Purchase Lacking Quotes Category 9.0 Purchasing

Issue/background: During detailed testing of purchases, we noted two (1) out of three (3) total samples that were classified as small purchases did not obtain or document written or verbal quotes.

- **Date:** 6/12/2025; **GL Code:** 4525; **GL Account Name:** Outreach Activities & Materials; **Amount:** \$3,503.03; **Grant Period/OCA Code(s):** 97Q14; **Payee:** Lakeshore; **Description:** Program Supplies

Criteria: Ch. 60A-1.002(3), F.A.C states that state agencies and entities are allowed to use quotes for purchases over \$2,500 and less than or equal to the threshold for Category Two but are required to obtain quotes.

2 CFR 200.320 (a)(2) – Simplified Acquisitions - The aggregate dollar amount of the procurement transaction is higher than the micro-purchase threshold but does not exceed the simplified acquisition threshold. If simplified acquisition procedures are used, price or rate quotations must be obtained from an adequate number of qualified sources.

Cause: The ELC misinterpreted DEL program guidance, not understanding the threshold for obtaining quotes is based on the aggregate purchase not the individual items purchased, resulting in procurement noncompliance.

Effect(s): Noncompliance with DEL program guidance and state statutes.

Recommendations: The ELC should complete tasks that include, but are not limited to, the following.

1. Confirm for DEL the results reported here. Testing results indicate one of three total sampled purchases did not follow the required procurement process for simplified acquisitions.
2. Review ELC records for the period October 1, 2024 – June 30, 2025 to determine whether other transactions did not follow the required procurement process. Prepare a summary and submit the summary to DEL. The summary should include a listing of transactions and brief details on what necessary procurement activities were not performed:
3. Address any identified deficiency, including after-the-fact documentation to ensure purchases are in accordance with DEL program guidance.

Early Learning Coalition of Escambia County, Inc. (ELC)
2025-26 Financial Monitoring Report for FY 2024-25
Period Reviewed: October 1, 2024 – June 30, 2025

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4. Review and update the ELC's internal controls, policies and procedures related to preparation and review and approval of the bank reconciliations regarding timing and documentation.
5. Conduct staff training to ensure ELC staff know about and can follow established or revised internal controls, policies, and procedures.

Observations

No observations identified in the monitoring period.