



Early Learning Coalition of the Nature Coast
Serving Citrus-Dixie-Gilchrist-Levy-Sumter Counties

Early Learning Program Operating Procedure (ELPOP)

Chapter 2: General Early Learning Requirements

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Chapter 2 General Early Learning Program Contract Requirements

2.1 General Requirements:

- A. A School Readiness Agreement will include the Coalition's ELCNC-18: School Readiness Provider Agreement and the Coalition's ELCNC-19: School Readiness Provider Agreement Attachments and any additional attachments/exhibits containing program special provisions and performance outcome measures. The standard agreement will include all basic federal and state requirements.
- B. Early learning provider reimbursement will be contingent upon the existence of a current executed contract and the availability of funds.
- C. Specific performance outcome measures are identified in Attachment I of the Early Learning contract. The Coalition may add and amend performance outcome measures as deemed necessary.
- D. The Coalition shall provide a copy of the Coalition's grievance policy to all clients and sub-contractors. The Grievance Policy is part of the Early Learning Coalition of the Nature Coast Administrative Operating Procedure. Families participating in or applying for the School Readiness program receive the ELCNC-224 Early Learning Services Appeal as a part of their enrollment/re-determination paperwork.

2.2 Suspected Fraud

- A. The following procedure is for reporting allegations of possible fraud in the Early Learning Programs (School Readiness and Voluntary Pre-Kindergarten). In the normal course of their work, Coalition staff members may identify instances of actual, potential or suspected fraud in the operation of any program funded by State or Federal funds administered through the Agency of Workforce Innovation (AWI). The Inspector General of AWI is designated the coordinator of all suspected fraud referrals to the Florida Department of Law Enforcement, Public Assistance Fraud Unit.

ANY ACTIVITY OR INCIDENT THAT POSES A DANGER TO THE HEALTH, SAFETY OR WELFARE OF ANY INDIVIDUAL SHOULD BE REPORTED IMMEDIATELY TO LOCAL LAW ENFORCEMENT OR EMERGENCY RESPONSE PERSONNEL.

All actual or suspected violations uncovered by or reported to the staff member must be reported immediately to the Client Service Manager for the appropriate county. The "Suspected Fraud Referral Record" form (DPAF 2013) will be completed by the ELCNC staff member. The staff member will determine the months the lost benefits occurred and the amount of lost benefits. All documentation supporting the alleged violation will be included with the form. Documentation will include reimbursement records and calculations detailing the amount involved. The monetary amount will be determined by the length of time and the nature of the infraction. Examples include but are not limited to: a difference in parent fee due to the client or a household member's income change; the total reimbursement amount for the period covered by falsified documents.

Types of potential fraud include but are not limited to:

- Forged documents
- Fake ID
- Change of income without 10 days notice
- Change of family size without 10 days notice
- Change of employment status (job loss) without 10 days notice
- Failure to report medical leave

The Client Service Manager will review the "Suspected Fraud Referral Record" form and attached documentation for completeness and determine if an overpayment occurred.

The Client Service Manager will contact the parent/guardian and schedule an interview. The interview will be used to determine if the fraud was intentional or was ~~just~~ an oversight on the parent/guardian's part. The Client Service Manager will complete a memo documenting the interview and include the Client Service Manager's determination if the program violation was intentional fraud or there was no intent to defraud and was an oversight that involved lost benefits.

Cases that are determined to involve obvious fraudulent documents will result in immediate termination of services. The completed "Suspected Fraud Referral Record" form, copies of the reimbursement records and calculations for the months that the fraudulent documents supported, copies of the fraudulent forms and any other pertinent information will be forwarded to the designated Fraud Referral Liaison for the Early Learning Coalition of the Nature Coast.

The Coalition Fraud Referral Liaison will submit all Suspected Fraud Referrals to OEL utilizing the on-line OEL Fraud Referral System. OEL will review the referral for appropriateness and completeness and forward to FDLE.

Cases involving increases in income that result in overpayments to providers will be forwarded to OEL if the overpayment amount is greater than \$1,000 and the interview determined that there was intent to defraud. Services will be terminated immediately.

If the interview determines that there was no intent to defraud, the parent/guardian will be offered the opportunity to make restitution and continue receiving School Readiness services. An ELCNC-296 Parent Improper Payment Adjustment will be completed and submitted to the Coalition Fraud Referral Liaison along with all supporting documentation. If the parent/guardian fails to make payments in the correct amount and per the schedule and the amount is \$999.99 or less ~~then~~ services will be terminated and no further action taken. If the amount is \$1,000 or more than services are terminated and the case will be submitted to OEL/FDLE utilizing the on-line OEL Fraud Referral System. A client who has lost a job has thirty (30) days to reestablish the purpose of care and child care costs incurred during that period are not counted toward lost benefits. Lost benefits calculation starts on the 31st day.

Clients whose cases have been terminated due to failure to make restitution may not be reinstated or resume services until restitution is made in full. Clients in receipt of a Protective Services or WAGES referral must be served while benefit recovery is being pursued.

Restitution payments will have a corresponding adjustment entered into the EFS system. The adjustment will reflect the actual occurrence for which restitution is being collected. It will include the appropriate billing group.

All restitution payments will require a receipt process, with a copy provided to the client making restitution, a copy to the Coalition's Finance Department, and a copy for the client's file.

All restitution payments will be submitted to the Finance Department immediately upon receipt.

2.3 Student Attendance Auditing

- A. The Coalition must receive the Provider Monthly Student Attendance Rolls by 5:00 pm on the second (2nd) working day of each month. Corresponding sign in/out sheets and the VPK Student Attendance and Parental Choice Certificate long forms (AWI-VPK 03-L) must be received in the appropriate Coalition office by 5:00 pm on the seventh (7th) working day of the month. The VPK Student Attendance and Parental Choice Certificate short form (AWI-VPK 03-S) cannot be used to verify daily attendance.
 1. Upon receipt, each roll and sign in/out sheet or approved verification form or a cover sheet must be date and time stamped and logged on the ELCNC-230: Provider Monthly Student Attendance Submission Tracking Form by the appropriate Client Services Administrative Assistant.

2. The sign in/out log or provider-developed Student Attendance Verification Form will be scanned in by the Client Services Administrative Assistant and the original returned to the provider by mail. The scanned copy shall be forwarded to the appropriate Client Services Counselor.
3. The Client Services Counselor will make a copy of the attendance rolls before submitting them to the Finance Department.
4. The Client Services Administrative Assistant will complete the ELCNC-231: Status of Attendance Form and forward copies to the Coalition's Finance Department and Contracts & Compliance Department.
5. The Client Services Counselors will perform a 100% verification of signatures from the sign in/out logs or the VPK Student Attendance and Parental Choice Certificate long forms (AWI-VPK 03L) by comparison with the Provider Monthly Student Attendance Rolls. Client Services Counselors will track the results on the ELCNC-246: Attendance Monitor Results Worksheet. They will enter the total days that were requested for reimbursement from the Provider Monthly Student Attendance Rolls on the ELCNC-246: Attendance Monitor Results Worksheet. An attendance verification error rate for that specific provider will be automatically calculated on this worksheet.
 - a. Signatures that cannot be verified due to the parent making a mark, "X", must be verified by the provider. The provider should initial each occurrence of the non-signature to show that they have verified the sign in/out.
 - b. The Client Services Counselor will make adjustments for any children paid who do not have a corresponding signature in accordance with Section 13: Processing Adjustments. Prior period adjustments must be completed by the 19th working day of the following month.
6. The ELCNC-246: Attendance Monitor Results Worksheet will automatically determine the error rate of attendance validation for a specific provider. The completed ELCNC-246: Attendance Monitor Results Worksheet will be reviewed by the Client Services Manager. The Client Services Manager will notify providers with a 10% error rate or higher that their school readiness agreement or VPK contract is in jeopardy of termination if the error rate is not immediately reduced utilizing the ELCNC-256: Attendance Monitor Notification. The Client Services Manager will send a copy of any such notifications to the Contracts & Compliance Office.

2.4 Other Related Issues

- A. The Coalition will require all subcontractors to list the Early Learning Coalition of the Nature Coast (including the Coalition's address) as a named insured on their general liability insurance policies, and will submit insurance certificates prior to the execution of the contract. The insurance certificates must include the business name, as it appears on the Child Care License, and physical address of the property being insured. The Coalition must terminate school readiness contracts the day prior to the expiration date on the insurance certificate, unless the school readiness provider submits a current, valid, and accurate insurance certificate.
- B. Confidentiality requirements for purchase of service programs. (See 45 C.F.R. 205.50.)
 1. Non-client specific information regarding the early learning programs, such as contracts and school readiness provider reimbursement will be available to the public.
 2. Client information relating to eligibility will be shared among the early learning providers, staff administering school readiness services under the early learning plan, the Coalition, and other authorized referring agencies as necessary and appropriate.
 3. Medical information, which is provided to the Coalition from the client's privately paid physician or other medical professional, is confidential and will not be disclosed without the consent of the client. This includes psychological evaluations and treatment plans for children at risk of abuse or neglect. This does not preclude

the sharing of information necessary for determining a child's eligibility as a special needs child with the executive director of the Coalition and/or his/her designee.

4. The individual records of children enrolled in School Readiness programs provided under s.411.01, held by an early learning coalition or the Agency for Workforce Innovation, are confidential and exempt from s.119.07(1) and s. 24(a), Art. 1 of the State Constitution. For purposes of this section, records include assessment data, health data, records of teacher observations, and personal identifying information.
 5. A parent, guardian, or individual acting as a parent in the absence of a parent or guardian has the right to inspect and review the individual school readiness program record of his or her child and to obtain a copy of the record.
 6. School Readiness records may be released to:
 - a. The United States Secretary of Education, the United States Secretary of Health and Human Services, and the Comptroller general of the United States for the purpose of federal audits.
 - b. Individuals or organizations conducting studies for institutions to develop, validate, or administer assessments or improve instruction.
 - c. Accrediting organizations in order to carry out their accrediting functions.
 - d. Appropriate parties in connection with an emergency if the information is necessary to protect the health or safety of the child enrollee or other individuals.
 - e. The auditor general in connection with his or her official functions.
 - f. A court of competent jurisdiction in compliance with an order of that court in accordance with a lawfully issued subpoena.
 - g. Parties to an interagency agreement among early learning coalitions, local government agencies providers of School Readiness programs, state agencies, and the Agency for Workforce Innovation for the purpose of implementing the School Readiness program.
- C. Agencies, organizations, or individuals that receive School Readiness records in order to carry out their official functions must protect the data in a manner that does not permit the personal identification of the child in a School Readiness program and his/her parents by persons other than those authorized to receive the records. The Coalition procedure for release of information in regard to children in the School Readiness program is contained in the ELCNC's Early Learning Eligibility Policy and Procedure Manual, section 16.
- D. The Coalition will revise and/or amend the ELPOP on an as-needed basis. Appropriate effective/implementation dates will be provided.