



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 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.

2.2 Suspected Fraud

- A. The Inspector General of the Agency for Workforce Innovations is designated the coordinator of all suspected fraud referrals to the Florida Department of Law Enforcement, Public Assistance Fraud Unit. School Readiness Partners are responsible for immediately reporting to the AWI Office of Inspector General and the Florida Department of Law Enforcement Public Assistance Fraud Unit all such actual or suspected violations uncovered by, or reported to the School Readiness Partner using the ELCNC-###: Suspected Fraud Referral Record Form (*DPAF2013*).
- B. 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.
- C. Any allegations, those judged to be of an emergency nature, those receiving public exposure, and those related to suspicions should be reported immediately to the Office of Inspector General (OIG) by telephone; (850) 245-7141, SUNCOM 205-7141 or 245-7138.
- D. All telephone reports should be followed by prompt written or electronic notification to OIG, using the Suspected Fraud Referral Record form or other suitable means. The Suspected Fraud Referral Record form is designed for promptly reporting to the AWI Inspector General, the Florida Department of Law Enforcement Public Assistance Unit and the School Readiness Program Office that an actual, potential, or suspected instance of fraud and abuse has occurred. The Suspected Fraud Referral Record form must be submitted simultaneously by fax to the following *four (4)* entities.
 - 1. AWI Office of Inspector General, Attention James F. Mathews (850) 245-7144
 - 2. FDLE Public Assistance Fraud Unit, Attention Chris Tolia (850) 922-1911
 - 3. The Office of Early Learning, Attention Executive Director (850) 921-3115
 - 4. The Early Learning Coalition of the Nature Coast, Attention Sonya Bosanko (352) 563-5933
- E. In completing the Case Identification Number field on the Suspected Fraud Referral Record form, use the Social Security Number if the subject is an individual or leave blank if the subject is a business entity. Provide the business entity information in the Comments section of the form.

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/or the School Readiness Student Attendance Verification Form or 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 (AIWI-VPK 03-S) cannot be used to verify daily attendance.
1. Upon receipt, each roll and sign in/out sheet or approved verification form 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 either the sign in/out logs or the Student Attendance Verification Form 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", or writing "Mom" or "Dad" or some other term describing their status 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.
- C. The following additional disclosure of client information will be authorized without consent of the client:
- a. To custodial parent(s), legal guardian(s), the child, or their attorneys.
 - b. To the court, the state attorney, and law enforcement if necessary to protect or otherwise provide for the child.
 - c. By subpoena in litigation involving school readiness service provision under the state plan.
- D. Any additional request for client specific information should be referred to the executive director of the Coalition for review and authorization prior to release.
- E. The Coalition will revise and/or amend the ELPOP on an as-needed basis. Appropriate effective/implementation dates will be provided.