



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

Early Learning Program Operating Procedure (ELPOP)

Chapter 4: Voluntary Pre-Kindergarten Program Requirements

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Table of Contents

Chapter 4	Voluntary Pre-Kindergarten Program Requirements	
4.1	General Services	3
4.2	Reimbursement Determination	3
4.3	Student Attendance	8
4.4	Child Eligibility and Enrollment	9
4.5	Delayed Enrollment	15
4.6	Re-Enrollment in a VPK Program for Good Cause or Extreme Hardship	15
4.7	Program Requirements and Provider Application and Procedures	17
4.8	Provider Compliance	23
4.9	Private and Public School Pre-kindergarten Readiness Rates and Provider Probation	29

Chapter 4
Voluntary Pre-Kindergarten Program Requirements

4.1 General Services

- A. The Coalition will completely document the provisions of services to each family and VPK provider in the statewide reporting system.
- B. The Coalition will implement a system of internal quality improvement processes. The system will focus on customer service, employee skills and development, and program services.
- C. The Coalition shall provide parents the opportunity to inspect and review the individual VPK record of his or her child and obtain a copy of such record upon request.

4.2 Reimbursement Determination

- A. The Coalition is responsible for determining the fixed provider rate (for each county in the Nature Coast region) based on the District Cost Differential rate, released by the Department of Education annually.
- B. The Coalition is responsible for the prepayment and reimbursement/reconciliation payments to VPK providers based on student attendance (an instructional day on which a child attends the VPK program, either in whole or in part) and enrollment.
- C. Reimbursement for absences will be authorized for no more than 20% of the provider's program per calendar month.
- D. A VPK provider may close its facility or program for emergencies at any time, however, in order to be eligible to receive payment, written documentation must be submitted to the Coalition which demonstrates that the closure is temporary and caused by circumstances beyond the provider's control.
 - 1. Documentation of the circumstances causing a temporary closure is not required if the provider's site is located in a county in which government offices normally open to the public are closed by the county, state, or federal governments, or public schools are closed by the school district because a state of emergency is declared to exist in the county by the county government, the Governor, or the President of the United States.
 - 2. The temporary closure is payable for the amount otherwise payable (as if each child enrolled in the VPK program attended the program), not to exceed ten (10) instructional days per closure. If circumstances cause more than one temporary closure, the closures are payable for a combined total of ten (10) instructional days. The provider is not required to revise its VPK class schedule if the temporary closure does not exceed ten (10) days.
 - 3. A temporary closure is not payable if the provider does not reopen and resume instruction after the closure.
 - 4. A VPK temporary closure is paid at the same hourly rate and for the same number of hours per day as normally scheduled.
 - 5. If the combined instructional days of one or more temporary closures extend beyond 10 instructional days, the provider shall revise its class schedule to restore each instructional day after the 10th instructional day. The revised schedule must not extend beyond the last day by which the VPK class is required to complete instruction. When revising its schedule the provider is not required to change the instructional hours per instructional day or instructional days per week of the current class schedule.

6. A temporary closure is not payable if the closure is caused by circumstances within a private provider's or public school's control. If a temporary closure is caused by circumstances within a private provider's or public school's control, the provider or school must revise its class schedule.
7. A temporary closure is not payable if a private provider or public school does not reopen and resume instruction after the closure. The Coalition shall assist a child with reenrollment if the child's VPK program does not resume instruction after a temporary closure.
8. If a child does not resume attendance in the VPK program after a temporary closure, notwithstanding the paragraphs above, the closure is payable, but the child's absence from an instructional day after the temporary closure is not payable.
9. A private provider or public school, instead of requesting payment for a temporary closure, may revise its class schedule to restore the instructional days that the closure affects.
10. A VPK provider will be compensated if it has to close its program on the first day of school because of a declared emergency; providers will be paid for each child enrolled at the time of the temporary closure.

E. Additional VPK Program Fees

1. A private pre-kindergarten provider or public school may not require a parent or child to pay fees or charges for any part of the VPK program, including, but not limited to, registrations fees.
2. A private pre-kindergarten provider or public school must notify the parent in writing of scheduled pick-up periods for the VPK program and the fees or charges for late pick up. This notification must be reviewed and signed by the parent. If a parent fails to pick up his or her child from a VPK program before the end of the pick-up period, the additional services provided for the child after the pick-up period are not considered part of the VPK program. A private pre-kindergarten provider or public school may require payment of fees or charges for late pick up. A provider or school may not assess late pick-up fees or charges for children in the VPK program at rates that exceed the rates assessed for children who are not in the program.
3. A private pre-kindergarten provider or public school may request a parent or child to voluntarily purchase or bring personal items to the VPK program, but may not require a parent or child to purchase or bring the items. These personal items include, but are not limited to, the following items:
 - a. Instructional materials or supplies;
 - b. Food products (e.g. lunch and snacks);
 - c. Hygiene products (e.g. tissues and soap); or
 - d. Sporting equipment.
4. A private pre-kindergarten provider or public school may request a parent or child to voluntarily pay for the cost of an offsite activity (e.g. field trip) that is conducted away from the provider's or school's VPK site, but may not require a parent or child to pay for the cost of the activity.
5. As used in this policy, the term "dress code" means the policy of a private pre-kindergarten provider or public school which requires children to wear specific types of clothing (e.g. white t-shirt and blue shorts) or which requires children to wear particular clothing (e.g. uniforms). If a provider or school adopts a dress code, the provider or school must notify the parent in writing of the dress code before delivery of VPK instruction has begun for the child. Thus, if a parent enrolls the child with a provider or school that has a dress code, the parent voluntarily chooses to comply with the dress code. A provider's or school's dress code is considered a

fee or charge for a child, and is consequently prohibited by the VPK program, if the provider or school does not notify the child's parent in writing of the dress code before the delivery of VPK instruction has begun for the child and/or adopts or changes to the dress code after the delivery of VPK instruction has begun for the child, or does not require all children attending the provider's or school's programs to comply with the dress code, regardless of whether the children are enrolled in the VPK program.

6. A private pre-kindergarten provider or public school may require the personal involvement or participation of parents in the delivery of the VPK program for their children, if the provider or school notifies each child's parent in writing of its parental involvement policy before the delivery of VPK instruction has begun for the child. As part of its parental involvement policy, a provider or school may require the personal attendance of parents at the provider's or school's VPK site for a specified period (e.g. volunteer hours). The provider or school may not, however, require parents to pay fees or charges in lieu of their personal involvement or participation.
7. A private pre-kindergarten provider or public school requesting a parent or child to voluntarily pay fees or charges for any part of the VPK program must inform the parent, in writing, that the payment of the fees or charges is voluntary and not a requirement for the child's participation in the program.
8. The Coalition will report providers that violate additional fees policy to the Agency for Workforce Innovation/Office of Early Learning.

F. Timing of Reimbursements

1. The Coalition will make prepayments to the VPK provider based on the anticipated and/or last month's enrollment unless the provider submits to the Coalition in writing the option to decline prepayment. The Coalition shall ensure all classrooms have the minimum number of children enrolled for payment.
2. The Coalition will generate a final prepayment report from the statewide reporting system on the first working day of every month detailing payment amounts for prepayments based on current student enrollment.
3. The Coalition shall mail the final prepayment provider reimbursement reports to each provider along with the payment (providers are encouraged to use the electronic funds transfer method) prior to the first day of the payment month.
4. The Coalition will make reimbursement/reconciliation payments to the VPK provider based on enrollment and attendance.
5. The Coalition will generate a final provider reimbursement/reconciliation report from the statewide reporting system on the ninth day of every month. Prior to the start day of the program the Coalition shall ensure all classrooms have the minimum number of children enrolled for payment.
6. The Coalition shall mail the final reimbursement/reconciliation reports along with the payment (providers are encouraged to use the electronic funds transfer method) no later than the 20th working day of the month following the service month.
7. An early learning provider that receives reimbursement for Voluntary Prekindergarten services may be obligated to repay the funds in full or in part for various reasons, including, but not limited to:
 - a. Overpayment
 - b. Improper payment
 - c. Disallowed payment as a result of an audit

- d. Reconciliation of a prepayment for the VPK program which results in a deficit at the end of a fiscal year
8. When an early learning provider's account with the Coalition becomes delinquent the Finance Manager must exercise and document due diligence in securing full payment by substantially performing the following collection efforts:
- a. Request for Payment: The Finance Manager must request the early learning provider in writing to repay the funds, specifying the amount the early learning provider owes, the reason the early learning provider is obligated to repay the funds, and the date by which the early learning provider is requested to repay the funds.
 - (A) First Demand for Payment: The Finance Manager, within ten (10) calendar days after the date the early learning provider's account becomes delinquent, issues the early learning provider a demand letter by certified mail, return receipt requested. The first demand letter must include the following:
 - i. Full amount that the early learning provider owes
 - ii. Reason the early learning provider's account is delinquent
 - iii. Demand for immediate repayment of the full amount by a date within 30 calendar days after issuance of the demand letter
 - iv. The early learning provider's right to dispute the delinquent account by submitting a written dispute to the Coalition before the date that the letter specifies; and
 - v. A description of the collection efforts that the Finance Manager may use if the early learning provider fails to repay the delinquent account.
 - (B) A Second Demand Letter for Repayment: The Finance Manager, within ten (10) calendar days after the early learning provider fails to repay a delinquent account in full by the date required in the first demand letter, issues the early learning provider a second and final demand letter by certified mail, return receipt requested. The second demand letter must include the following:
 - i. Full amount that the early learning provider owes
 - ii. Reason that the early learning provider's account is delinquent
 - iii. Demand for immediate repayment of the full amount by a date within ten (10) calendar days after issuance of the second demand letter
 - iv. The early learning provider's right to dispute the delinquent account by submitting a written dispute to the Coalition before the date specified in the first demand letter, if the date is not expired
 - v. Notice that the early learning provider may not receive further state or federal funds from the Coalition until the early learning provider repays the delinquent account in full; and

- vi. Notice that the Coalition may report a delinquent account for collection by the Agency for Workforce Innovation if the early learning provider fails to repay the account in full by the date required in the second demand letter
 - b. Repayment Schedule: The Finance Manager may negotiate a repayment schedule that allows the early learning provider to submit partial repayments. The Finance Manager must require the early learning provider to repay the entire amount within six (6) months of the date specified in the request for payment.
 - c. Offsetting Payment: The Finance Manager may offset, in full or in part, an amount that the early learning providers owes for one early learning program with state or federal funds due from the Coalition to the early learning provider for another early learning program. The Finance Manager must accurately enter the offsetting state or federal funds across programs. The transaction in the Coalition's accounting records must clearly identify the repayment from the early learning provider to the program that the early learning provider owes and payment to the early learning provider from funds due to the early learning provider for the other program. The Finance Manager may offset an amount that an early learning provider owes the Coalition from funds for one fiscal year with funds due from the Coalition to the early learning provider for a subsequent fiscal year. The Coalition must accurately enter the offsetting funds across fiscal years. The transaction in the Coalition's accounting records must clearly identify the repayment from the early learning provider for the fiscal year that the early learning provider owes and payment to the early learning provider for the subsequent fiscal year from which payment is due from the Coalition to the early learning provider. The Coalition may continue to offset state or federal funds across early learning programs or fiscal years to secure full payment of the debt after the debt becomes a delinquent account.
9. The Finance Manager may report a delinquent account to the Agency for Workforce Innovation (AWI) if:
 - a. The Finance Manager's efforts to collect the delinquent account do not result in repayment in full; and
 - b. The early learning provider does not have a continuing contractual relationship with the Coalition which is anticipated to result in funds available for offset (described earlier)
10. To report a delinquent account for collection by AWI, the Finance Manager must submit its request in writing.
11. AWI may deny the Finance Manager's request to report a delinquent account for collection if the Finance Manager does not submit documentation of due diligence in securing the full payment by substantially performing the collection efforts described earlier. AWI may also deny a request if the request does not contain the following information:
 - a. The early learning provider's name, address, and federal employer identification number or social security number, as applicable;
 - b. The full amount that the early learning provider owes;
 - c. If the early learning provider repays part of the debt, the amounts collected and uncollected;
 - d. The underlying agreement between the Coalition and the early learning provider;
 - e. The date that the early learning provider's account becomes delinquent;
 - f. The Finance Manager's efforts to collect the delinquent account and the dates of the collection efforts;

- g. Copies of the demand letters that the Finance Manager issued to the early learning provider, including proof of issuance such as a certified mail receipt; and
 - h. If the early learning provider disputed the delinquent account, the documentation of the dispute-resolution process and result of the dispute.
12. If the Finance Manager's report of a delinquent account for collection does not include the required information, AWI may return the request to the Coalition. If the Finance Manager does not resubmit the request with the required information within forty-five (45) calendar days after AWI returns the request AWI may deny the request. If AWI denies the Finance Manager's report of a delinquent account for collection by AWI, AWI may return the delinquent account to the Coalition and deduct the amount that the early learning provider owes from state or federal funds due to the Coalition from AWI.

G. Forms required for reimbursement

- 1. An attendance roster will be completed by each VPK provider to receive reimbursement and to document that the VPK services were provided. Absences are not payable until the student attends one day of VPK instruction. For example, documented A's on the attendance roster are not payable prior to the student's first day of attendance.
- 2. The Coalition will not process attendance rolls that are submitted beyond sixty (60) days of a reimbursement period. VPK providers submitting attendance rolls on the sixty-first (61st) day and beyond agree to forfeit reimbursement for that period of time.
- 3. All VPK providers will receive a copy of the Trial Reimbursement report generated by the Enhanced Field System (EFS). This form will serve as a receipt for services. VPK providers are required to review these reports and report any discrepancies to the Finance Manager within sixty (60) days of the payment date by utilizing the ELCNC-248: Improper Payment Dispute Form. If the form is not received within this time period, the VPK provider agrees to forfeit any underpayment due. Any overpayment must still be repaid to the Coalition by the end of the month following the payment date. This must be completed either by reduction in the following month's reimbursement or a direct payment made directly to the Coalition. No reimbursement disputes will be processed if they are submitted more than sixty (60) days after payment is received.

4.3 Student Attendance

- A. The VPK provider must maintain a daily sign-in record that documents the date, child's name, and the signature of the child's parent or designee. The provider or school may use an electronic system to record this attendance documentation in lieu of a paper sign-in record, except that the system must record an electronic signature, card swipe, entry of a PIN, or similar daily action by the parent or designee; or the VPK provider must maintain a verifiable method to document attendance which reflects each child's daily attendance in the VPK program.
 - 1. Each private provider or school shall require the parent of each student in the VPK program to verify the student's attendance during the prior month, as follows:
 - a. If the provider or school uses a daily sign-in record, the parent must certify the student's attendance using the ELCNC-03S AWI-VPK-03S Student Attendance and Parental Choice Certificate – Short Form.
 - b. If the provider or school uses a method to document attendance other than a daily sign-in record, the parent must certify the student's attendance using the ELCNC-06 AWI-VPK-03L Student Attendance and Parental Choice Certificate – Long Form. The provider or school must enter the

student's attendance on the form or attach documentation to the form which includes the student's attendance *before* a parent signs the long form.

- c. The Coalition may require that a provider or school submit a signed copy of ELCNC-03S AWI-VPK-03S Student Attendance and Parental Choice Certificate – Short Form or ELCNC-03L AWI-VPK-03L Student Attendance and Parental Choice Certificate – Long Form. If required, the provider shall submit the form to the Coalition by the date specified.
2. All VPK providers must retain daily attendance documentation, including electronic media, for at least two years after the child's last day of attendance in accordance with the ELCNC-09 AWI-VPK-20 Statewide Provider Agreement.
3. The Coalition shall generate a form for the attendance roster using the statewide information system and provide the roster to the provider or school at least eight days prior to the end of the month. The provider or school will certify student attendance by completing the attendance roster and submitting it to the ~~service~~ Coalition. In order to certify student attendance for purposes of payments for the VPK program, each private provider or public school must submit the monthly attendance roster. Public school districts may submit the daily classroom attendance attached to the ELCNC-03L AWI VPK-03L Student Attendance and Parental Choice Certificate – Long Form as an alternative to the EFS generated attendance roll.
4. Providers shall submit completed attendance rosters for the previous month by 5:00 pm on the second working day of the month.
5. Paid absences will not be authorized until the student attends a day of VPK instruction.

4.4 Child Eligibility and Enrollment

- A. The Coalition will perform the services necessary to determine the eligibility and enrollment of VPK children.
- B. A parent or guardian registering his or her child for the VPK program must either register online at www.vpkflorida.org or complete ELCNC-01 AWI-VPK-01 Child Application and submit the completed form to the Coalition.
- C. VPK Parent Application and Procedures
 1. A parent wishing to enroll his or her child in the VPK Education Program must fill out form ELCNC-01 AWI-VPK-01 Child Application. This application must be completed to determine whether a child is eligible for the VPK Program. The application must be completed in full by a parent or guardian with whom the child lives.
 2. Availability of forms and submission: A parent may also complete the application online at www.vpkflorida.org, or obtain a paper application from the Coalition. If a paper form is used, the parent must mail or deliver the completed paper form to the Coalition. The Coalition must consider all applications submitted regardless of where the parent lives, where the parent works, or a neighboring county.
- D. Within two days after receiving an application, the Coalition will contact the parent with instructions on how to submit the documentation of the child's residency and date of birth in accordance with the proof of residency and proof of age section of this policy.
- E. The Coalition must determine child eligibility for the VPK program by verifying the child's age eligibility, residence eligibility, and participation eligibility.
 1. Age Eligibility

- a. To be eligible for VPK, a child must be four (4) years of age, but not five (5) years of age or older, on September 1 of the program year. (60BB 8.200(1)(a) F.A.C.
- b. When a child becomes eligible for kindergarten or is admitted to kindergarten the child is no longer eligible for VPK. A child who is 5 years of age on or before September 1 is eligible for kindergarten and is not eligible for VPK. Likewise, a child who has not attained 4 years of age by September 1 of a school year is not eligible for VPK during the school year or summer program that immediately follows.
- c. During the application process, the Coalition shall collect and retain in the child's file a photocopy of at least one of the following documents for purposes of verifying age:
 - (A) An original or certified copy of the child's birth record filed according to law with a public officer charged with the duty of recording births
 - (B) An original or certified copy of a certificate of baptism showing the date of birth and place of baptism of the child, accompanied by an affidavit sworn to or affirmed by the parent stating that the certificate is true and correct.
 - (C) An insurance policy on the child's life that has been in force for at least 2 years, which reflects the child's birth date
 - (D) A passport or certificate of arrival in the United States showing the birth date of the child
 - (E) An immunization record indicating the child's date of birth, signed by a public health officer or by a licensed practicing physician
 - (F) A valid military dependent identification card showing the child's date of birth; or
 - (G) If none of the documents listed above can be produced, an affidavit of age sworn to or affirmed by the parent, accompanied by a certificate of age reflecting the child's birth date, signed by a public health officer or by a licensed practicing physician which states that the physician has examined the child and believes that the age as stated in the affidavit is substantially correct.

2. Residence Eligibility

- a. The Coalition must only establish where the child lives, not test the legal residency of the child. Children who reside in Florida are qualified to receive services. Children attending a VPK provider within the Nature Coast region are qualified to receive VPK services from the Early Learning Coalition of the Nature Coast regardless of their county of residence.
- b. The following are acceptable documents to establish where a child resides and must contain the name of the parent or guardian of the child and the address of the parent or guardian as submitted on ELCNC-01 AWI-VPK-01 Child Application. Post office boxes are not sufficient to determine residency. During the application process, the Coalition shall collect and retain a copy of at least one of the following documents for purposes of verifying residency:
 - (A) Utility bill;
 - (B) Pay stub;
 - (C) Residential rental agreement or receipt from rental payment;

- (D) Government-issued document (e.g. Florida driver's license, Florida identification card, property tax assessment showing a homestead exemption); or
- (E) Military order showing that the child's parent is a service member in the United States Armed Forces and is assigned to duty in Florida when the child attends the VPK program (e.g., permanent change of station).
- (F) If none of the above documents can be produced, an affidavit of physical address sworn to or affirmed by the parent, accompanied by a letter from a landlord or property owner stating that the child resides at this address will be accepted.
- (G) If an applicant is a participant in the "State of Florida Address Confidentiality Program", he/she is not required to disclose their physical address. This program was established in F.S. 741.405 to allow victims of domestic violence to deal with state and legal matters without disclosing physical addresses. The statute states: "A program participant may request that state and local agencies or other governmental entities use the address designated by the Attorney General as his or her address..." The parent should provide official documentation of the fictitious address that was provided at the time that they began participation in the program. This fictitious address received from the Attorney General's Office to serve as the proof of residential requirements for the school readiness program.

- c. A homeless child, as defined in Section 1003.01, F.S., must have access to the VPK program. The Coalition shall assist homeless children and may determine residency based on other documentation as necessary. The Coalition may accept documents such as a letter from a homeless shelter stating that the child is homeless and resides in Florida, or an affidavit sworn to or affirmed by the child's parent stating that the child is currently homeless.

3. Participation Eligibility

- a. The Coalition is responsible for ensuring that the child receives VPK services and funding for one full-time equivalent.
 - b. In the case of reenrollment due to extreme hardship, a student may receive a summer 300 hour program in addition to prior attendance, if they are eligible under this category.
 - c. A parent may enroll the child in either the 540 hour school year program or the 300 hour summer program.
- F. The Coalition must perform a face-to-face consultation in person with the parent or guardian of every child that registers for the VPK program. During the consultation, the Coalition shall determine the child's eligibility for the VPK program.
- 1. The Coalition is not required to perform a face-to-face parent consultation for a child if the Coalition previously conducted a face-to-face consultation with the child's parent or guardian for another early learning program (e.g., school readiness program or program for pre-kindergarten children with disabilities), Coalition maintains the child's records for the other early learning program, and the Coalition verifies against those records the completed ELCNC-01 AWI-VPK-01 Child Application and supporting documentation submitted by the parent or guardian.
- G. Upon determining that a child is eligible for the VPK program, the Coalition must give the child's parent or guardian an ELCNC-02 AWI-VPK-02 Certificate of Eligibility either completed by the Coalition as a paper form or as an electronically generated and printed form.

1. The Coalition shall assign a number to each Certificate of Eligibility utilizing the following system:
 - a. Two digits for month of eligibility certification
 - b. Two digits for day of eligibility certification
 - c. VPK "year." e.g. The letter "A" indicating year 2005, the letter "B" for 2006, the letter "C" for 2007, etc.
 - d. Four digits for time of day of eligibility certification. Military time is utilized.
 - e. Four or five digit Coalition employee number or identification number

Example: 0525A09321234 (child was determined eligible on May (05) 25, 2005 (A), at 9:32 by employee number 1234.
2. The Coalition shall instruct the parent to select a provider utilizing the Coalition's Provider Profiles (described later in this policy) or the profiles found on the Child Information System (managed and operated by the Department of Children and Families). These sources describe the available program options. In addition the Coalition will explain the parent's or guardian's rights and responsibilities and provide the parent with the Certificate of Eligibility.
4. The parent will submit the ELCNC-02 AWI-VPK-02 Certificate of Eligibility to the VPK provider of their choice.
5. The "Official Use Only" section of Form AWI-VPK 01 will be completed by Coalition Client Services staff in accordance with the following: The Counselor determining the child's eligibility for the VPK program will sign and date as "process agent" if all eligibility requirements are met and documentation on file. A peer counselor will verify that date of birth verification, residency and parent signature on the AWI-VPK 01 are complete and the child is eligible for the program. The peer counselor will sign and date the "Process Manager" field, thus indicating that monitoring of the VPK eligibility process has occurred.
6. The private VPK provider may establish and use criteria to determine whether to admit a child for services in the school-year or summer programs. The Coalition recommends that these criteria be objective and apply uniformly for all children. Objective criteria may include, but are not limited to the following:
 - a. Random selection (e.g. lottery)
 - b. Geography (e.g., children who reside within a certain school zone or children who reside within a county served by the provider or school)
 - c. First come first served
 - d. Previous service (e.g. children previously served by the provider or school)
 - e. Targeted populations (e.g. children at risk of abuse, neglect, or exploitation; children whose family income does not exceed 150% of the federal poverty level; or children who are eligible for free and reduced-price lunch meals under the National School Lunch Program).
7. The public VPK providers may establish and use criteria to limit the number of children admitted by a particular public school for services in the school-year program. The Coalition recommends that these admissions criteria be objective and apply uniformly for all children. Objective criteria may include, but are not limited to the following:

- a. Random selection (e.g. lottery)
 - b. Geography (e.g., children who reside within a certain school zone or children who reside within a county served by the provider or school)
 - c. First come first served
 - d. Previous service (e.g. children previously served by the provider or school)
 - e. Targeted populations (e.g. children at risk of abuse, neglect, or exploitation; children whose family income does not exceed 150% of the federal poverty level; or children who are eligible for free and reduced-price lunch meals under the National School Lunch Program)
8. The public VPK providers are required to provide for the admission of every eligible child residing in the district whose parent registers the child for services delivered by a public school in the summer program. However, the district may establish and use criteria to limit the number of children admitted by a particular public school. The Coalition recommends that these criteria be objective and apply uniformly for all children. If the school district limits the number of children served by a particular public school in the summer program, but the number of eligible children exceeds the available spaces, that school district must make additional spaces available necessary to serve all eligible children in the district.
9. State and federal law prohibits certain discriminatory admissions criteria, as follows:
- a. Race, color, or national origin: VPK providers are prohibited from discriminating against a parent or child, including the refusal to admit a child for enrollment in the VPK program, by violating federal civil rights requirements that prohibit exclusion from participation in, denial of the benefits of, or other discrimination under a program "on the ground of race, color, or national origin" (42 U.S.C. § 2000d).
 - b. Supplemental services: VPK providers are prohibited from requiring a child to enroll for, or requiring the payment of any fee or charge for, supplemental services as a condition of admitting the child in the VPK program.
 - c. Children with disabilities Federal law prohibits public schools and many private pre-kindergarten providers from discriminating against children with disabilities.
10. The private pre-kindergarten provider or the public school may not require a parent to enroll his or her child in, or require payment of fees or charges for supplemental services (e.g., extended day, extended year, wrap around etc) as a condition of admitting the child in the VPK Program. The Coalition will report providers that violate this policy to the Agency for Workforce Innovation/Office of Early Learning.
11. The Coalition will assign a confirmation number when a provider contacts the Coalition to confirm the participation of a student in the provider's VPK program. The Coalition will verify the students' eligibility through the statewide information system. Once eligibility has been confirmed the Coalition will assign a confirmation number and instruct the provider to input the number on the ELCNC-02 AWI-VPK-02 Certificate of Eligibility. The confirmation number will be created using the following formula:
- a. Two digits for month of enrollment
 - b. Two digits for date of enrollment
 - c. The letter "A" indicating the year 2005, the letter "B" for 2006, the letter "C" for 2007, etc.

- d. Four digits from the COE indicating the time that eligibility was originally determined by Coalition staff
- e. The four or five digit employee number of the staff who completed eligibility
- f. The four digit employee number of the Coalition staff who is confirming eligibility and providing the confirmation number

Example: 0530A093312348925 - From this formula we are able to identify that the child was enrolled on May 30, 2005 (0530A) The time of original eligibility (9:33); employee number (1234). The Coalition staff that who verified eligibility and issued the confirmation number (8925).

12. To complete the application process, the private pre-kindergarten provider or public school will submit a copy of the ELCNC-02 AWI-VPK-02 Certification of Eligibility to the Coalition. Section 111: "Admission by Provider/School" must include: name of provider, address, telephone, fax number (if applicable), VPK class, date the child will begin attendance and signature and date certifications by both the parent and provider. Section 1V: "Enrollment Submission and Confirmation" must indicate the child's enrollment confirmation number. The Coalition will enter the child's information into the designated statewide information system.
 - a. The Coalition shall assign student identification number to every eligible child for the VPK program and input the number into the statewide information system. A system to formulate the identification number will be established by the Coalition and will be used for eligibility services.
 - b. The Coalition will determine the eligibility expiration date based on the birth date of the child and the number of VPK service hours completed. The child is only eligible for VPK until the child becomes eligible for Kindergarten. The child becomes eligible for kindergarten if the child is five years on or before September 1. The expiration date must be prior to the beginning of the child's kindergarten eligibility regardless if the child attends kindergarten or not, or the day after 540 hour of VPK services are completed, which ever date is first.
 - c. In cases of reenrollment for good cause, the receiving provider will be notified of the number of hours remaining for the student based upon the information obtained from the EFS system (for internal ELCNC reenrollments) or information provided by the exiting coalition if applicable. It is the responsibility of the VPK provider to monitor child VPK hours for cases in which information regarding VPK hours elapsed is obtained from other coalitions. If overpayment of VPK hours occurs, the overpayment must be corrected in the EFS system. A provider is obligated to repay funds due to overpayment of VPK program hours.
13. The Coalition is encouraged, but not required to notify a parent or guardian by U.S. Mail after the enrollment of his or her child with the provider's or school class is completed in the designated statewide information system. The ELCNC-02 AWI-VPK-02 Certificate of Eligibility will be distributed as follows:
 - a. White Copy: The VPK provider
 - b. Yellow Copy: Provider returns to Coalition with parent signature and confirmation number
 - c. Pink Copy: The parent will maintain for his/her records
 - d. Goldenrod Copy: The Coalition will maintain at time of issuance
14. If a child is registered for the VPK program in the Nature Coast program but is ultimately admitted into the program by a provider or school located in a county within another coalition's geographic region, the parent

must be instructed to re-register and enroll the child with the other Coalition. If a parent previously registered with another Coalition; however, would like his/her child to attend a VPK program within the Nature Coast region the parent must register with the Nature Coast Coalition. Re-registration of a child is ultimately the parent's responsibility. In order to facilitate the re-registration, the Coalition is authorized to enter into agreements with other Coalitions and/or service providers to provide for the transfer of a child's registration application and supporting documentation. If the previous Coalition or service provider performed a face-to-face parent consultation the Nature Coast Coalition is not required to repeat the consultation.

15. The Coalition shall document enrollments in the statewide reporting system utilizing the child's VPK application and supporting documents.

4.5 Delayed Enrollment

1. An eligible child may be enrolled in the VPK program and begin instruction in a VPK pre-kindergarten class after instruction has begun for the class, if at least 10 percent (10%) of the class' instructional hours remain (54 hours for a school-year program or 30 hours for a summer program) and the child was not previously enrolled in the VPK program.
2. Delayed enrollment does not limit the parent's right to withdraw and reenroll their child in another VPK program, if reenrollment requirements are met.
3. Payments for absences and attendance of a delayed enrollment are governed by the policies in the reimbursement section.
4. A parent or guardian who enrolls a child as a delayed enrollment must sign an ELCNC-04 AWI-VPK-04 Informed Parental Consent. The Coalition shall maintain a copy of the informed parental consent in child's VPK record.

4.6 Re-Enrollment in a VPK Program for Good Cause or Extreme Hardship

- A. After a student is withdrawn or dismissed, the parent or guardian may be eligible to re-enroll the student with another private pre-kindergarten provider or public school if he or she:
 1. Has attended a portion of VPK instruction,
 2. Has been enrolled in a VPK class for 70% or less of the program type's instructional hours,
 3. Has not previously re-enrolled for good cause or due to an extreme hardship,
 4. Is subsequently removed or withdrawn from enrollment with a VPK provider, and
 5. Is prevented from attending the VPK program for good cause or an extreme hardship.
- B. Good Cause Re-Enrollment
 1. A re-enrollment for good cause must occur within the same program type (school-year or summer) and based on one of the following reasons:
 - a. Illness of student or another individual living in the student's household in accordance with the relationships defined in 60BB-8.210 F.A.C
 - b. Disagreement between parent/guardian and provider or school concerning policies, practices, or procedures at the provider's or school's VPK program

- c. Change in student's residence
- d. Change in parent/guardian's employment schedule or place of employment
- e. Provider's inability to meet the student's health or educational needs
- f. Termination of a student's class before 70% of instructional hours are delivered
- g. Student is dismissed by the provider for failure to comply with the provider's attendance policy
- h. The provider's designation as a low-performing provider under section 1002.67, F.S.
- i. Any condition described as an extreme hardship in accordance with 60BB-8.210 F.A.C

C. Extreme Hardship Re-Enrollment

1. A re-enrollment due to an extreme hardship allows student to receive 300 VPK instructional hours in a summer program. Extreme hardship re-enrollment must be based on one of the following reasons and requires the appropriate supporting documentation:
 - a. Illness of student if the illness results in the student being absent for more than 30% of the number of hours in the program type for which the student is enrolled as documented by a licensed physician
 - b. Provider's misconduct or noncompliance which results in provider's inability to offer the VPK program as documented by the early learning coalition
 - c. The parent/guardian's inability to meet the basic needs of the student, including, but not limited to, lack of food, shelter, clothing, or transportation as documented by a federal, state, or local government official
 - d. Provider's inability to meet the student's educational needs due to the student's learning or developmental disability as documented by a federal, state, or local government official
 - e. Provider's inability to meet the student's health needs as documented by a licensed physician or a federal, state, or local government official
 - f. Displacement of a student from his or her place of residence or closure of the student's VPK provider as a result of a state of emergency declared by a federal, state, or local government official.
2. In order to re-enroll a student, the parent or guardian must complete the ELCNC-05 AWI-VPK-05 Re-enrollment Application April 9, 2010) and submit to the Coalition. Re-enrollment due to an extreme hardship must be supported with appropriate documentation.
3. If the student is re-enrolled with a Coalition other than the Coalition of the previous enrollment, the parent or guardian must also complete and resubmit the ELCNC-01 AWI-VPK-01 Child Application.

4. The Coalition shall follow the procedures for registration, eligibility determination, and enrollment of the student in the VPK program as described in this policy, except that the Coalition is not required to repeat the face-to-face parent consultation performed by the Coalition of the previous enrollment.

D. Class Transfers in VPK

1. A private pre-kindergarten provider or public school may change a student's enrollment from one VPK pre-kindergarten class to another VPK pre-kindergarten class at the same provider or school of the same program type (school-year or summer). The student may not transfer between a 540 hour school year program and a 300 hour summer program.
2. VPK providers are required to submit ELCNC-258 VPK Notice of Class Transfer to the Coalition when changing a student's enrollment from one VPK class to another to facilitate the necessary adjustment in the statewide information system.

4.7 Program Requirements and Provider Application and Procedures

- A. To be eligible to deliver the pre-kindergarten 540 hour school year program a pre-kindergarten provider must meet each of the following requirements:

1. The pre-kindergarten provider must be a child care facility licensed under s. 402.305, F.S., family day care home licensed under s. 402.313, F.S., large family child care home licensed under s. 402.3131, F.S., nonpublic school exempt from licensure under s. 402.3025(2), F.S., faith-based child care provider exempt from licensure under s. 402.316, F.S., or a public school. Providers required to be licensed are authorized to provide pre-kindergarten services under a provisional license.
2. The pre-kindergarten provider must:
 - a. Be accredited by an accrediting association that is a member of the National Council for Private School Accreditation, the Commission on International and Trans-Regional Accreditation, or the Florida Association of Academic Nonpublic Schools; (see ELCNC-17 Accrediting Associations and Agencies Recognized by the Voluntary Pre-Kindergarten Program.
 - b. Hold a current Gold Seal Quality Care designation under s. 402.281; F.S., or
 - c. Be licensed under s. 402.305, s. 402.313, or s. 402.3131 F.S., and demonstrate, before delivering the Voluntary Pre-kindergarten Education Program, as verified by the early learning Coalition, that the provider meets each of the requirements of the program under this part, including, but not limited to, the requirements for credentials and background screenings of pre-kindergarten instructors, minimum and maximum class sizes, pre-kindergarten director credentials, and a developmentally appropriate curriculum.
3. The pre-kindergarten provider must have, for each pre-kindergarten class, at least one pre-kindergarten instructor who holds, at a minimum, one of the following credentials:
 - a. A child development associate credential issued by the National Credentialing Program of the Council for Professional Recognition and must successfully complete an emergent literacy training course approved by the Department of Education;
 - b. A credential approved by the Department of Children and Family Services as being equivalent to or greater than child development associate credential issued by the National Credentialing Program of the Council for Professional Recognition and must successfully complete an emergent literacy training course approved by the Department of Education;

- c. A bachelor's or higher degree in early childhood education, pre-kindergarten or primary education, preschool education, or family and consumer science;
 - d. A bachelor's or higher degree in elementary education, if the pre-kindergarten instructor has been certified to teach children any age from birth through 6th grade, regardless of whether the instructor's educator certificate is current, and if the instructor is not ineligible to teach in a public school because his or her educator certificate is suspended or revoked;
 - e. An associate's or higher degree in child development;
 - f. An associate's or higher degree in an unrelated field, at least 6 credit hours in early childhood education or child development, and at least 480 hours of experience in teaching or providing child care services for children any age from birth through 8 years of age; or
 - g. An educational credential approved by the Department of Education as being equivalent to or greater than the educational credential described above.
4. Each pre-kindergarten instructor employed by the pre-kindergarten provider must be of good moral character, must be screened using the level 2 screening standards in s. 435.04 F.S., before employment and re-screened at least once every 5 years, must be denied employment or terminated if required under s. 435.06, F.S., and must not be ineligible to teach in a public school because his or her educator certificate is suspended or revoked.
5. If the credentialed instructor assigned to a VPK class is absent, the private provider or public school must assign a substitute instructor to temporarily replace the credentialed instructor. The substitute instructor may not be used for more than 30% of a program's hours. Providers may use different substitute instructors on different days, but the combined instructional hours of all substitutes cannot exceed 30% of the VPK program hours. Substitute VPK instructors must have at least one of the credentials listed below and cleared through the level 2 background screening process required by statute.
- a. Summer Program
 - (A). An associate's or higher degree of study in any field
 - (B). A national early child development credential (NECC)
 - (C). A credential approved by DCF as being equivalent or greater than an NECC credential
 - b. School Year Program
 - (A). Any of the requirements listed above for a summer program
 - (B). A DCF 40-hour Introductory Child Care Training course if the class is offered in a child care facility
 - (C). A DCF 30-clock hour Family Child Care Home Training course if the class is offered in a family day care home
 - (D). The local school district's requirements to be employed as a substitute teacher as adopted by each school district
6. Each of the pre-kindergarten provider's pre-kindergarten classes must be composed of at least four (4) students but may not exceed twenty (20) students. In order to protect the health and safety of students, each

private pre-kindergarten provider must also provide appropriate adult supervision for students at all times and, for each pre-kindergarten class composed of twelve (12) or more students, must have, in addition to a pre-kindergarten instructor who meets the credential requirements above, at least one adult pre-kindergarten instructor who is not required to meet those requirements but who must be cleared through the level 2 screening process as required by statute.

- a. Blended classes: A private provider or public school may organize a VPK class as a blended class, instructing children enrolled in the VPK program together with children not enrolled in the program. A blended class may include children of any age. A private provider or public school, however, may not organize a blended class in a multi-age arrangement that prevents the provider or school from implementing a developmentally appropriate curriculum in accordance with program requirements.
 - b. Minimum class size: The Coalition may not issue the initial prepayment for a VPK class unless at least four children in the class are enrolled in the VPK program. A private provider or public school does not violate the minimum class size, if:
 7. Fewer than four children enrolled in the VPK program attend a VPK class on a particular day; or
 8. After the initial prepayment is issued, fewer than four children in a VPK class remain enrolled in the VPK program (e.g., withdrawals).
 9. If a VPK class is composed of four or fewer children enrolled in the VPK program, the private provider or public school may not dismiss from the class a child enrolled in the program, unless:
 - a. The private provider or public school documents in writing the child's noncompliance with the conduct or attendance policies of the provider or school district, as applicable; and
 - b. The private provider or public school submits documentation of the child's noncompliance to the Coalition within three (3) business days after the child's dismissal.
 - c. Maximum class size: A VPK class may not exceed twenty (20) children for a school-year program or twelve (12) children for a summer program. Children enrolled in the VPK program, and children not enrolled in the program, are both counted toward the twenty (20) child or twelve (12) child maximum class size. A VPK class may not exceed the maximum class size in enrollment or attendance on a particular day.
 - d. Multi-class group: A private provider or public school may instruct two (2) or more VPK classes as one group in a single classroom. A VPK class within a multi-class group may not exceed the maximum class size.
 - e. This policy does not allow a private provider or public school to exceed a staff-to-children ratio, square footage per child, licensing requirements under Sections 402.301-.319, F.S., or other state or local requirement.
 10. Public school must be certified through the State Board of Education meeting the requirements of s. 1003.03 and the schedule in s.1(a), Art. IX of the State Constitution and Commissioner of Education as meeting the educational facilities and capital outlay funds, and projected student enrollment requirements.
- B. To be eligible to deliver the private and public school 300 hour summer pre-kindergarten program a private pre-kindergarten or public pre-kindergarten program must meet all of the standards listed above and the following:
1. Each public school and private pre-kindergarten provider must have, for each pre-kindergarten class, at least one pre-kindergarten instructor who:

- a. Is a certified teacher; or
 - b. A bachelor's or higher degree in early childhood education, pre-kindergarten or primary education, preschool education, or family and consumer science; or
 - c. A bachelor's or higher degree in elementary education, if the pre-kindergarten instructor has been certified to teach children any age from birth through 6th grade, regardless of whether the instructor's educator certificate is current, and if the instructor is not ineligible to teach in a public school because his or her educator certificate is suspended or revoked.
2. Each pre-kindergarten instructor employed by a public school or private pre-kindergarten provider delivering the summer pre-kindergarten program must be of good moral character, must be screened using the level 2 screening standards in s. 435.04, F.S., before employment and re-screened at least once every 5 years, must be denied employment or terminated if required under s. 435.06, F.S., and must not be ineligible to teach in a public school because his or her educator certificate is suspended or revoked. This subsection does not supersede employment requirements for instructional personnel in public schools which are more stringent than these requirements. Public schools must submit a statement certifying that all teachers and approved adults are in compliance with the screening requirements mandated in chapter 1002; 402.319 and 402.302 Florida Statutes. Private programs must submit a document of proof for each requirement above.
3. Each pre-kindergarten class in the summer pre-kindergarten program, regardless of whether the class is a public school's or private pre-kindergarten provider's class, must be composed of at least 4 students but may not exceed (12) students. In order to protect the health and safety of students, each public school or private pre-kindergarten provider must also provide appropriate adult supervision for students at all times.
4. Each private and public pre-kindergarten provider must select or design a curriculum that the provider or school uses to implement the Voluntary pre-kindergarten program. The curriculum must be developmentally appropriate, designed to prepare students for early literacy, designed to enhance the age-appropriate progress of students in attaining the performance standards adopted by the Department of Education and prepare students to be ready for kindergarten based upon the statewide kindergarten screening.
5. Each private pre-kindergarten provider and district school board must adopt an attendance policy and provide the parent or guardian of each student with a written copy.
6. A private provider or public school interested in delivering the VPK Program must complete an application Form AWI-VPK 10 (Statewide Provider Registration Application) and Form AWI-VPK 11 A & B (Class Registration Application). The application forms are available electronically as an editable form in Adobe® Portable Document Format (PDF) at www.vpkflorida.org. The forms are also available from the Coalition as a paper form. Completing the forms does not guarantee approval to deliver the VPK Program. The Coalition shall assist providers in filing out or submitting a VPK provider application upon request.
7. The provider and public school must schedule each of its VPK classes in accordance with the following requirements:
 - a. School Year Programs: A VPK class in a school-year program may not begin instruction before the first day of the VPK school year. The class must complete instruction of at least 540 instructional hours by the last day of the VPK school year (e.g. June 30) (a credentialed instructor or substitute instructor must be present throughout the instructional time and must be engaged in the activities or experiences by teaching, directing, supporting, or observing the activities or experiences). The VPK pre-kindergarten class may not begin instruction before the opening of the public school year.

- b. Summer Programs: A VPK class in a summer program may not begin instruction before May 1 and must complete at least 300 instructional hours (a credentialed instructor or substitute instructor must be present throughout the instructional time and must be engaged in the activities or experiences by teaching, directing, supporting, or observing the activities or experiences).
- 8. The provider shall mail or deliver the completed forms to the Early Learning Coalition of the Nature Coast. The forms must be submitted with all required attachments.
- 9. Coalition staff will review each VPK provider application and supporting documentation as follows:
 - a. The Program Manager will review each provider VPK application for accuracy and completeness in accordance with the Provider Compliance section of this policy.
 - b. The Program Manager will verify all information submitted on the application through a variety of methods including the use of the Department of Children and Families data systems and in accordance with the Provider Compliance section of this policy.
 - c. The Program Manager shall review all private provider instructors level 2 background screenings in accordance with the following:
 - (A) The Coalition shall verify that every private pre-kindergarten provider delivering the VPK program within the Coalition's service delivery area complies with this program instruction. To satisfy this requirement, the Coalition shall collect and review copies of all level 2 background screening records for each of the provider's pre-kindergarten center directors, VPK lead instructors, VPK assistants, and listed VPK substitutes in accordance with statutory requirements.
 - (B) In accordance with s. 1002.67(3)(a), F.S., each district school board shall verify that each public school delivering the Voluntary Pre-kindergarten Program within the school district complies with the requirements for background screening of pre-kindergarten instructors in s. 1002.61(5), F.S., and s. 1002.63(6), F.S. Therefore, the Coalition is not required to collect level 2 background screening documents from district school boards but do require the district school boards to submit a verification form indicating the VPK instructor(s), assistants, and substitutes background screening status by listing the following codes: C-cleared, P-pending, D-disqualified. Results from the Florida Department of Law Enforcement must be received by the district school board prior to assignment of VPK instructor, assistant, or substitute in the VPK classroom
 - d. The Program Manager will initial each provider VPK application where applicable (Process Agent) when required documentation is received and verified.
 - e. The Program Manager shall forward the provider VPK application and all supporting documentation to the Executive Director of the Coalition for a second review. The Executive Director of the Coalition will sign each application where applicable (Process Manager).
 - f. The Program Manager shall forward the Statewide Provider Agreement Form AWI-VPK 20 to the provider for signature and to the Executive Director of the Coalition for execution on behalf of the Early Learning Coalition of the Nature Coast.
- 10. The Program Manager or designee will complete a VPK provider profile for each approved provider based on the information submitted on the AWI-VPK 10 and AWI-VPK 11 A & B. The profiles will include the provider's or school's services, curriculum, instructor credentials, instructor-to-student ratio, and the provider's or school's readiness rate based on the most recent available results of the statewide kindergarten screening.

The profile is made available to the public upon request and is also entered into the Child Care Information System.

11. The Coalition may not pay a private provider or public school for the VPK program, except under a provider agreement with the Coalition. A school district may sign a provider agreement on behalf of a public school in the district.
12. The Coalition shall keep a signed copy of a provider agreement in the Coalition's records on the private provider and public schools.
13. A provider agreement shall contain identical terms and conditions as Form AWI-VPK 20 (Statewide Provider Agreement). Except as provided below, a provider agreement may not omit, supplement, or amend the terms and conditions of Form AWI-VPK 20.
14. The Coalition may enter into a provider agreement that omits, supplements, or amends the terms and conditions of Form AWI-VPK 20, if:
 - a. The Coalition submits the agreement to the Office of Early Learning of the Agency for Workforce Innovation in writing, dated, and signed by the Coalition and the private provider or public school; and
 - b. The Deputy Director to the Office of Early Learning of the Agency for Workforce Innovation approves the agreement.
15. If any information listed on the Form AWI-VPK 10 (Statewide Provider Registration Application) or Form AWI-VPK 11 A & B (Class Registration Application) changes, the provider agrees to notify the Coalition in writing immediately by completing an amended form as applicable. Revisions that only involve the change of instructional staff may be submitted by completing the ELCNC-12 VPK Provider Application Amendment. Requested changes will not take effect until all documentation, background screening clearances, and educational credential documents have been received and approved by the Coalition.
16. If a VPK program experiences a change in ownership, the new owner must complete Forms AWI-VPK 10 & 11 A & B and sign a Form AWI-VPK 20 (Statewide Provider Agreement) to receive payment for VPK instructional hours. The Coalition may not reimburse a provider for instructional days delivered before the signature date on the Form AWI-VPK 20.

The Coalition must approve a new owner's submitted Forms AWI-VPK 10 & 11 A & B before the provider delivers instruction or receives payment for a VPK program. If the provider fails to notify the Coalition of the change in ownership, the Coalition will not reimburse the instructional days between the last day of service delivered by the previous owner and the signature date on the new VPK Statewide Provider Agreement.

The Coalition may sign a VPK Statewide Provider Agreement with a new owner as long as the child care center is legally operating in accordance with the Department of Children and Families (DCF) requirements.

In the case of change in ownership, the Coalition will request and maintain a copy of the Bill of Sale in the provider's file for reference.

When a change in ownership occurs, the provider's accreditation may not automatically transfer to the new owner. If a provider is eligible to deliver VPK services because of an accreditation, the provider should obtain evidence from the accrediting agency whether or not the accreditation transfers to the new owner.

Procedures for documenting change of ownership in the Enhanced Field System are contained in Office of Early Learning Quality Note 09.02 (QN 09.02) June 2009.

OEL's Ownership Decision Matrix intended to help determine when to document an ownership change or other provider demographic changes in EFS are contained in Office of Early Learning Quality Note 09.02 (QN 09.02) June 2009.

4.8 Provider Compliance

- A. Coalition staff will ensure that each VPK provider is audited at least once a year to monitor compliance of each VPK classroom with the Voluntary Pre-Kindergarten Program. The Coalition shall audit all private VPK providers. A school district may choose to monitor compliance of its public schools' school year and summer programs at least once annually, submitting audit documentation to the Coalition by March 1st of the current fiscal year for school year programs and by August 1st for summer programs. If school districts do not choose to monitor the public school VPK sites, the Coalition will conduct the audits. Desk audits will be completed prior to the execution of the Statewide Provider Agreement (AWI-VPK-20). The Program Manager shall complete the non-shaded sections of the ELCNC-15 VPK Provider Audit Tool – Private Provider for private VPK providers. School districts that choose to monitor the public schools shall complete the ELCNC-16 VPK Provider Audit Tool – Public Schools. Audits will be conducted in accordance with the following:
1. The Program Manager shall verify that a copy of the private pre-kindergarten provider's child care license is on file, current and meets the following:
 - a. The pre-kindergarten provider must be a child care facility licensed under s. 402.305 F.S., family day care home licensed under s. 402.313 F.S., large family child care home licensed under s. 402.3131 F.S., nonpublic school exempt from licensure under s. 402.3025(2) F.S., faith-based child care provider exempt from licensure under s. 402.316 F.S., or a public school. Providers required to be licensed are authorized to provide pre-kindergarten services under a provisional license.
 2. If applicable, the Program Manager shall verify that a copy of the VPK provider's accreditation certification, or applicable documentation, is on file, current, and meets one of the following:
 - a. The program is accredited by an accrediting association that is a member of the National Council of Private School Accreditation, the Commission of International and Trans-Regional Accreditation, or the Florida Association of Academic Nonpublic Schools. See ELCNC-17 Accrediting Associations and Agencies Recognized by the Voluntary Pre-Kindergarten Program.
 - b. The program holds a current Gold Seal Quality Care designation under s. 402.281 F.S.; or
 - c. The program is licensed under s. 402.305, s. 402.313, or s. 402.3131 F.S., and demonstrates, before delivering the Voluntary Pre-kindergarten Education Program, as verified by the Coalition, that the provider meets each of the requirements of the program under this part, including, but not limited to, the requirements for credentials and background screenings of pre-kindergarten instructors, minimum and maximum class sizes, pre-kindergarten director credentials, and a developmentally appropriate curriculum.
 3. The Program Manager shall verify that a copy of the private VPK program's director's background screening is on file with the Coalition and meets the following requirements:
 - a. Each pre-kindergarten instructor employed by the pre-kindergarten provider must be of good moral character, must be screened using the level 2 screening standards in s. 435.04 F.S., before employment and re-screened at least once every 5 years, must be denied employment or terminated if required under s. 435.06 F.S., and must not be ineligible to teach in a public school because his or her educator certificate is suspended or revoked.

4. The Program Manager shall verify that a copy of the private VPK program's director's VPK director credential is on file with the Coalition and meets the following:
 - a. The pre-kindergarten provider must have a pre-kindergarten director who has a pre-kindergarten director credential that is approved by the Department of Education.
5. The Program Manager shall verify that each VPK provider has adopted an attendance policy that meets the following:
 - a. Each private pre-kindergarten provider and district school board must adopt an attendance policy that requires the parent of each student enrolled in the Voluntary Pre-Kindergarten program to verify each month the student's attendance on the prior month's certified student attendance.
6. The Program Manager shall verify that a copy of the lead instructor's credential meets one of the following requirements and is on file with the Coalition. The school district designee shall verify that each lead instructor's credentials meet one of the following requirements.
 - a. Private and public pre-kindergarten lead instructors in a 540 instructional hour program: The classroom must have at least one instructor that meets one of the following:
 - (A) A child development associate credential issued by the National Credentialing Program of the Council for Professional Recognition and must successfully complete an emergent literacy training course approved by the Department of Education;
 - (B) A credential approved by the Department of Children and Family Services as being equivalent to or greater than child development associate credential issued by the National Credentialing Program of the Council for Professional Recognition and must successfully complete an emergent literacy training course approved by the Department of Education;
 - (C) A bachelor's or higher degree in early childhood education, pre-kindergarten or primary education, preschool education, or family and consumer science;
 - (D) A bachelor's or higher degree in elementary education, if the pre-kindergarten instructor has been certified to teach children any age from birth through 6th grade, regardless of whether the instructor's educator certificate is current, and if the instructor is not ineligible to teach in a public school because his or her educator certificate is suspended or revoked;
 - (E) An associate's or higher degree in child development;
 - (F) An associate's or higher degree in an unrelated field, including at least 6 credit hours in early childhood education or child development, and at least 480 hours of experience in teaching or providing child care services for children any age from birth through 8 years of age; or
 - (G) An educational credential approved by the Department of Education as being equivalent to or greater than the educational credential described above.
 - b. Private and public pre-kindergarten instructor in a 300 instructional hour summer program: The classroom must have at least one pre-kindergarten instructor who:
 - (A) Is a certified teacher; or meets one of the following:

- (B) A bachelor's or higher degree in early childhood education, pre-kindergarten or primary education, preschool education, or family and consumer science;
- (C) A bachelor's or higher degree in elementary education, if the pre-kindergarten instructor has been certified to teach children any age from birth through 6th grade, regardless of whether the instructor's educator certificate is current, and if the instructor is not ineligible to teach in a public school because his or her educator certificate is suspended or revoked;

c. Private and Public Pre-Kindergarten Substitute Instructors:

(A) If the credentialed instructor assigned to a VPK class is absent, the private provider or public school must assign a substitute instructor to temporarily replace the credentialed instructor. The substitute instructor must have the credentials required for a credentialed instructor.

(B) A private provider or public school that fails to assign a substitute instructor who has the required credential is not in compliance with the VPK law; however, the Coalition may not remove a private provider from the VPK program, or otherwise take enforcement action on a provider, if the provider is not able to find a substitute instructor who has the required credentials but temporarily assigns a substitute instructor who meets the following alternate requirements:

i. A substitute instructor assigned to a VPK class in a school-year program must successfully complete one or more of the following before instructing the class:

- i. An associate's or higher degree in any field of study;
- ii. A 40-clock-hour introductory course in child care for child care personnel of a child care facility which is approved by the Department of Children and Family Services
- iii. A 40-clock-hour introductory course in group child care for an operator of a large family child care home which is approved by the Department of Children and Family Services.
- iv. A 30-clock-hour introductory course in child care for an operator of a family day care home which is approved by the Department of Children and Family Services.

ii. A substitute instructor assigned to a VPK class in a summer program must successfully complete one or more of the following before instructing the class:

- i. An associate's or higher degree in any field of study;
- ii. A child development associate (CDA) credential issued by the National Credentialing Program of the Council for Professional Recognition; or
- iii. A credential approved by the Department of Children and Family Services as being equivalent to or greater than the national CDA.

(C) A private provider or public school that assigns a substitute instructor who does not have the required credentials must notify the Coalition of the assignment utilizing ELCNC-13 VPK Non-Credentialed Substitute Teacher Report.

(D) If a credentialed instructor is absent for more than 10 consecutive instructional days, the private provider or public school must also give the Coalition a written description of the

provider's or school's efforts to find and assign an instructor who has the required credentials, utilizing ELCNC-13 VPK Non-Credentialed Substitute Teacher Report.

- (E) If a credentialed instructor is absent for twenty (20) or more consecutive instructional days, the Coalition may take enforcement action on the private provider, and the school district may take enforcement action on the public school, if the provider or school does not assign a substitute instructor who has the required credentials for a subsequent consecutive absence.
 - (F) A substitute instructor, whether or not the instructor has the required credentials, must comply with the background-screening requirements prior to working in the VPK classroom.
7. The Program Manager shall verify a copy of the instructor's background screening and ELCNC-37 Attestation of Good Moral Character meets the following and is on file with the Coalition if employed in a private VPK program.
- a. Each pre-kindergarten instructor employed by a public school or private pre-kindergarten provider delivering the pre-kindergarten program must be of good moral character, must be screened using the level 2 screening standards in s. 435.04 F.S., before employment and re-screened at least once every 5 years, must be denied employment or terminated if required under s. 435.06, F.S., and must not be ineligible to teach in a public school because his or her educator certificate is suspended or revoked. This subsection does not supersede employment requirements for instructional personnel in public schools which are more stringent than these requirements. Public schools must submit a statement certifying that all teachers and approved adults are in compliance with the screening requirements mandated in chapter 1002; 402.319 and 402.302 F.S. Private programs must submit a document of proof for each requirement above.
8. The Program Manager shall verify the classroom schedule is on file with the Coalition and meets the following:
- a. School Year Programs: A VPK class in a school-year program may not begin instruction before the first day of the VPK school year. The class must complete instruction of at least 540 instructional hours by the last day of the VPK school year (e.g. June 30) (a credentialed instructor or substitute instructor must be present throughout the instructional time and must be engaged in the activities or experiences by teaching, directing, supporting, or observing the activities or experiences). The VPK pre-kindergarten class may not begin instruction before the opening of the public school year.
 - b. Summer Programs: A VPK class in a summer program may not begin instruction before May 1 and must complete at least 300 instructional hours (a credentialed instructor or substitute instructor must be present throughout the instructional time and must be engaged in the activities or experiences by teaching, directing, supporting, or observing the activities or experiences). The 300 instructional hours must be completed before the uniform date fixed by the school district for the opening of public school programs in the county.
9. The Program Manager shall submit the completed desk audit of private VPK providers, the Statewide Provider Agreement (AWI-VPK-20), and supporting documentation to the Executive Director of the Coalition for approval and execution. For public school programs, the Program Manager shall submit the Statewide Provider Agreement (AWI-VPK-20) and the supporting documentation to the Executive Director for approval and execution. Upon approval and execution the Executive Director shall return the provider documents to the Program Manager.
10. Site Audit: Upon completion of the desk audit, the Program Manager shall place the private VPK provider on the audit schedule. If a school district chooses not to audit its public school VPK programs, the Program Manager or designee will also place public school VPK providers on the audit schedule.

If upon completion of the site audit, the VPK provider is found to be out of compliance in one or more areas, the VPK provider will be offered technical assistance to correct the non-compliance(s). A return site audit will be conducted by the Program Manager or designee. The timeframe for the return site audit will be determined at the Program Manager's discretion in accordance with the severity of the non-compliance issue(s) and will not exceed thirty (30) days. If upon completion of the return site audit the VPK provider is found to be in compliance with all requirements, post-audit procedures for compliant VPK providers described later in this policy will be followed. If upon completion of the return site audit the VPK provider is found to be out of compliance with site audit requirements in one or more areas, post-audit procedures for non-compliant VPK providers described later in this policy will be followed.

The Program Manager or designee shall complete the shaded sections of the VPK Audit Tool in accordance with the following:

- a. The Program Manager or designee shall verify the VPK Director listed on file with the Coalition is the same VPK Director on site (private providers only).
- b. The Program Manager or designee or the school district designee shall verify the lead and assistant (if applicable) instructor listed on file with the Coalition is the same instructor in the classroom.
- c. The Program Manager or designee or the school district designee shall review the daily classroom schedule and verify the number of instructional hours in accordance with the programs annual schedule and the following instructional hour criteria:
 - (A) An instructional hour is defined as sixty (60) consecutive or non-consecutive minutes of instructional time planned activities or experiences that implement a private provider's or a public school's curricula for the VPK program. The planned activities or experiences must accomplish one or more of the following:
 - i. Prepare children for early literacy
 - ii. Enhance the age appropriate progress of children in attaining the performance standards adopted by the Department of Education for one or more of the following domains of development:
 - (a) Physical health
 - (b) Approaches to learning
 - (c) Social and emotional development
 - (d) Language and communication
 - (e) Emergent literacy
 - (f) Cognitive development and general knowledge
 - (g) Motor development
 - (h) Prepare children to be ready for kindergarten
- d. The Program Manager or designee or the school district designee shall review the early learning provider's attendance verification documents for compliance with the following:

- (A) During the site visit the Program Manager or designee shall verify compliance with the following:
 - i. Each private provider or school shall require the parent of each student in the VPK program to verify the student's attendance during the prior month, as follows:
 - ii. If the provider or school uses a daily sign-in record, the parent must certify the student's attendance using the short form of the Student Attendance and Parental Choice Certificate (Form AWI-VPK 03S). The parent verifies monthly attendance for their child for the prior month.
 - iii. If the provider or school uses a method to document attendance other than a daily sign-in record, the parent must certify the student's attendance using the long form of the Student Attendance and Parental Choice Certificate (Form AWI-VPK 03L). The parent verifies monthly attendance for their child for the prior month. The provider or school must enter the student's attendance on the form or attach documentation to the form which includes the student's attendance *before* a parent signs the long form.
 - e. The Program Manager or designee or the school district designee shall verify the instructor to child ratio is in compliance with the following:
 - (A) For each pre-kindergarten class composed of twelve (12) or more students, the classroom must have, in addition to a pre-kindergarten instructor who meets the credential requirements above, at least one adult pre-kindergarten instructor who is not required to meet those requirements but who must meet the background screening requirement.
 - f. The Program Manager or designee or the school district designee shall verify the classroom composition is in compliance with the following:
 - (A) Each of the pre-kindergarten provider's pre-kindergarten classes must be composed of at least 4 students but may not exceed twenty (20) students.
 - (B) Blended classes: A private provider or public school may organize a VPK class as a blended class, instructing children enrolled in the VPK program together with children not enrolled in the program. A blended class may include children of any age. A private provider or public school, however, may not organize a blended class in a multi-age arrangement that prevents the provider or school from implementing a developmentally appropriate curriculum in accordance with Section 1002.67(2) (b), F.S.
 - (C) Maximum class size: A VPK class may not exceed twenty (20) children for a school-year program or twelve (12) children for a summer program. Children enrolled in the VPK program, and children not enrolled in the program, are both counted toward the twenty (20) child or twelve (12) child maximum class size. A VPK class may not exceed the maximum class size in enrollment or attendance on a particular day.
 - (D) Multi-class group: A private provider or public school may instruct two or more VPK classes as one group in a single classroom. A VPK class within a multi-class group may not exceed the maximum class size.
- E. The Program Manager or designee shall verify the classroom curriculum listed on file with the Coalition is the same curriculum utilized in the classroom.

11. Post-Audit Procedures:

- a. The Program Manager or designee or the school district designee shall submit the completed audit to the Executive Director.
- b. The Executive Director shall review the audit and complete one of the following:
 - (A) If the audit reports compliance with all requirements the Executive Director will indicate the audit status as closed and submit the audit and supporting documentation to the Program Manager. The Program Manager shall provide a copy of the audit to the VPK provider and file the closed audit and supporting documentation in the VPK provider's file.
 - (B) If the audit reports non-compliance in any area the Executive Director will indicate the audit status as pending and submit the audit and supporting documentation to the Program Manager or designee. The Program Manager or designee shall complete the following:
 - (C) Submit a letter to the VPK provider stating the following:
 - i. A description of the non-compliance cited
 - ii. Date of non-compliance
 - iii. A description of the corrective action plan which must include the following:
 - i. The Coalition must implement a full payback for VPK services on the date the non-compliance was cited.
 - ii. An additional site audit must be completed within thirty (30) calendar days of the original audit. The audit must be completed by the same person/agency that conducted the original audit.

4.9 Private and Public School Pre-kindergarten Readiness Rates and Provider Probation

A. Identifying Low Performing VPK Providers

1. The VPK legislation establishes that the Department of Education shall calculate readiness rates annually for each school-year and/or summer VPK provider. The Program Manager is responsible for collecting readiness rate information on each contracted VPK provider when the rates are released.
2. The Program Manager will assist VPK providers that are identified as Low Performing Providers with the VPK improvement plan approval process.
3. Acknowledgement of Low Performing Provider Status and Provider Improvement Plan
 - a. The Program Manager will ensure that each low performing provider understands that the process requires that each provider acknowledge their low performing status within twenty-one (21) calendar days from the State Board's adoption of the minimum readiness rate, utilizing the www.ImproveVPK.org website.
 - b. The Program Manager will ensure that each low performing provider understands that the process requires that each provider then has thirty (30) calendar days to submit an improvement plan to the Coalition or school district, as applicable, using the online template available at

www.ImproveVPK.org. The Coalition will notify those providers that they will be ineligible to deliver a new VPK program until the improvement plan has been approved.

- c. The Program Manager will review the improvement plans submitted by the private providers. A plan will be considered complete when it contains activities in at least two target improvement areas, in addition to a needs assessment, as applicable. Items available on the website template's pull down menus have been designated as acceptable. If a provider creates a different activity by using the "other" pull down option, the plan should be approved if it is complete, includes a needs assessment, as applicable, and has an improvement strategy and timeline for at least two of the following target areas:
 - (A) Administrative and management practices
 - (B) Developmentally appropriate curricula
 - (C) Classroom learning environment
 - (D) Classroom instruction practices
 - (E) Child developmental screenings and assessments
 - (F) Social-emotional interactions
 - (G) Family involvement
- d. If a provider has not completed the required acknowledgement and improvement process, the Program Manager will ensure that the provider does not receive prepayment or deliver a new VPK session. The prepayment MAY be approved on a case by case basis, however, if the provider fails to meet the improvement plan requirements, the Coalition is responsible for collecting the prepaid funds from the provider. The provider may not be paid retroactively for VPK services delivered before the improvement plan approval date. If parents have enrolled their children in a low performing provider that becomes ineligible due to non-compliance with the improvement plan process, the Coalition will notify those parents, assisting them in making alternative plans regarding their choice of VPK program for their child.
- e. The Program Manager will communicate with school district personnel responsible for the low performing provider process, as applicable, to ensure that the school district meets the requirements for acknowledgement and submission of an improvement plan. The Program Manager will also collect documentation that the improvement plan is approved as appropriate. A school district will notify the Coalition about the status of the low performing providers in their district which have not completed improvement plans at the end of the improvement plan cycle.
- f. The Program Manager will review readiness rates for both school year and summer programs, and will ensure that any low performing providers of either program follow the requirements. For example, a provider may be low performing for the school year program, but not for the summer program. In this case, the provider would need to acknowledge that status and submit an improvement plan for the school year program, but not for the summer program. If that provider fails to submit an improvement plan for the school year program, the provider is still eligible to deliver the summer program.

4. The Improvement Process Website

- a. The Program Manager will assist providers as necessary with the use of the www.ImproveVPK.org website, to submit their acknowledgement, their improvement plan, and their periodic reports.
- b. If a private provider wishes an alternative method of submission of an improvement plan, AWI will assist the provider in obtaining Form AWI-VPK 30, so that they may submit their request. If the private provider's request is approved, AWI will send a confirmation letter and instructions to the provider and will send a copy of the confirmation letter to the Coalition. Plans submitted using Form AWI-VPK 30 must be entered into the www.ImproveVPK.org website by the Program Manager. The Program Manager will send written correspondence to the provider including a print-out of the electronic document and confirmation of status or the submission by certified mail.
- c. If, upon review by the Program Manager, an improvement plan is not approved, the provider is required to resubmit a revised plan within thirty (30) calendar days of notification posted on the www.ImproveVPK.org website. A provider must have an approved plan before it can provide the type of VPK program (school year or summer) that received a rate below the minimum acceptable readiness rate.
- d. The Program Manager will verify that each low performing provider demonstrates implementation of its improvement plan activities by submitting periodic progress reports in November, February, May, and August. Progress reports will include dates of activities and provider comments. Each provider will submit reports through the www.ImproveVPK.org website unless it is approved in writing by AWI to submit paper reports using Form AWI-VPK 31.
- e. If a private provider wishes an alternative method of submission of the periodic progress reports, the Program Manager will assist the provider in obtaining Form AWI-VPK 31, so that they may submit their request. If the private provider's request is approved, AWI will send a confirmation letter and instructions to the provider and will send a copy of the confirmation letter to the Coalition. Progress reports submitted using Form AWI-VPK 31 must be entered into the www.ImproveVPK.org website by the Program Manager. The Program Manager will send written correspondence to the provider including a print-out of the electronic document and confirmation of status or the submission by certified mail.
- f. The Program Manager will document the completion of the improvement plan approval cycle. An improvement plan approval cycle will be considered complete when every low performing provider has either (1) submitted an improvement plan that has been approved or (2) has been removed from the program and marked "inactive" in EFS. Documentation of one of these outcomes and copies of correspondence with the provider will be maintained in each low performing provider's file and in EFS system notes, as appropriate.

5. Two-Year Low Performing Providers

- a. If a provider or school is found to be a low performing provider for two consecutive years, the Program Manager will assist the provider with the continuation of their improvement process as indicated above. The provider will be required to utilize a Department of Education approved VPK curriculum. The provider will be required to follow the improvement process outlined above, including progress reports, etc. until the provider or school meets the minimum rate adopted by the State Board of Education as satisfactory.

6. Three-Year Low Performing Providers

- a. A provider or school that is placed on probation must continue the improvement process including the use of a curriculum adopted by the Department of Education until the provider or school meets the minimum rate adopted by the State Board of Education as satisfactory.

7. Four-Year Low Performing Providers

- a. If a provider or school is found to be a low performing provider for four (4) consecutive years, they will no longer be eligible to deliver the VPK program.