

AGENCY FOR WORKFORCE
INNOVATION

OFFICE OF EARLY LEARNING

OFFICE OF PROGRAM
EFFECTIVENESS AND
ANALYSIS

REPORT NO. 06-06

MANAGER

TIM ELWELL

REVIEW SUPERVISORS

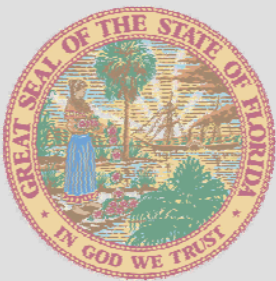
*WINSTON CROFT
JOHN HUGHES
PAT WEYER*

REVIEW TEAM

*TAMARA AKINS
CHERYL BLANTON
ED HACHENBERGER
KAREN MOON
GINGER TATE
BETTY WALLACE
COURTNI WHEELLESS
REGINAL WILLIAMS*

EDITORS

*LAURA KATE BARRETT
GINGER TATE*



STATE OF FLORIDA

DECEMBER 2006

Performance & Accountability



REVIEW OF THE EARLY LEARNING COALITION OF SEMINOLE

DECEMBER 2006

Introduction



Results in Brief

In accordance with Florida law, the Agency for Workforce Innovation's Office of Early Learning conducted a performance and accountability review of the Early Learning Coalition of Seminole between August and November 2006.

In general, the Seminole coalition complies with state and federal rules and regulations and is effectively implementing early learning programs for Seminole County. Of particular note, the coalition uses effective policies and procedures to govern coalition programs and operations and is implementing a comprehensive strategy to improve educational services to young children. In addition, the Seminole coalition is effectively implementing strategies to improve community awareness of early education programs and to maximize available resources through collaboration with other organizations and agencies in its service area.

While overall program implementation is effective, the review found two major issues that could diminish the Seminole coalition's effectiveness if not addressed in a timely manner. Specifically:

- The Seminole coalition has not conducted sufficient on-site monitoring of its contracted service provider to ensure that services are being delivered in a manner consistent with contracted purposes and requirements. This is a serious issue since the coalition conducts major portions of its programmatic operations through contractual arrangements. Critical programmatic areas affected by insufficient monitoring include educational services for the school readiness program, child care resource and referral, and provider compliance for the Voluntary Prekindergarten (VPK) program.
- Although the Seminole coalition accurately determines provider eligibility for the VPK program, it allowed providers to participate in 2005-2006 without obtaining all of the documentation needed to substantiate the credentials of their instructional staff.

A brief summary of the Seminole coalition's performance in specific areas of program implementation is provided below.

Chapter 1 - Governance and Operations (pages 5 through 13)

Overall, the Seminole coalition uses effective policies and procedures to govern coalition operations. The coalition has an effective board and committee structure that facilitates decision-making and information sharing. In addition, the coalition's executive leadership exercises effective oversight of financial and programmatic operations.

Chapter 2 - Contract and Grant Management (pages 14 through 19)

While the Early Learning Coalition of Seminole (the coalition) has generally established effective policies and procedures for awarding contracts and procuring goods and services, it has not fully implemented a process for monitoring its contracted service provider. Since the coalition conducts major portions of programmatic operations through contractual arrangements, staff need to implement an effective monitoring process to ensure that program services are delivered in a manner consistent with contracted purposes and requirements.

Chapter 3 - Child Care Resource and Referral (R&R) (pages 20 through 25)

Overall, the Seminole coalition has an effective resource and referral program that meets most of the Standard Levels of Service established by the Office of Early Learning. However, the provider information maintained by the coalition's service provider for resource and referral is not always accurate, complete, and up-to-date. In addition, the coalition's website does not include content for resource and referral services or provide contact information for the program.

Chapter 4 - Community Outreach (pages 26 through 31)

The Seminole coalition is implementing strategies to improve community awareness of early education programs and to maximize available resources through collaboration with other organizations and agencies in its service area. While overall collaboration is effective, the Seminole coalition only marginally collaborates with community partners who offer services to children who are at-risk or in receipt of TANF funds.

Chapter 5 - Eligibility Determination (pages 32 through 39)

Overall, the Seminole coalition is effectively managing processes for determining client eligibility and service priorities for the school readiness program. The coalition's contracted service provider has established policies and processes to help ensure accurate eligibility determinations for children participating in the program. However, for the VPK program, the coalition should take additional steps to ensure that all VPK instructor qualifications are consistently verified and documented.

Chapter 6 - Educational Services (pages 40 through 47)

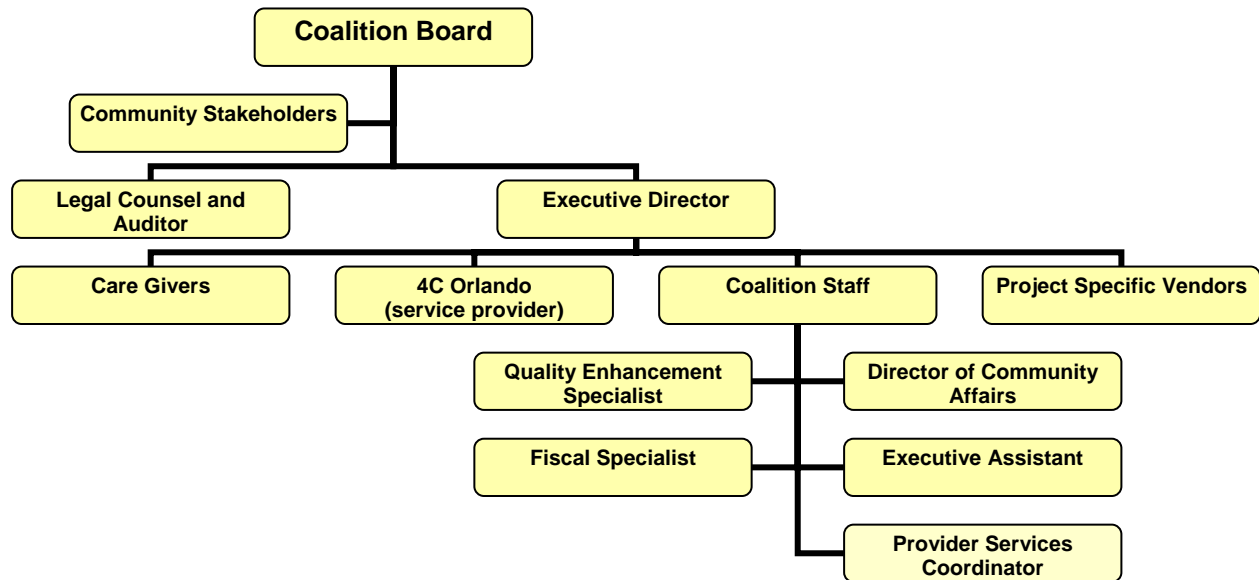
The Seminole coalition is implementing a comprehensive strategy for improving educational services in its community. For example, the coalition has implemented a full range of developmental screening and assessment services for children in the school readiness program. However, the coalition has not conducted sufficient monitoring of its contractor to ensure that the educational services are being delivered as intended.

Background

Early learning coalitions operate in accordance with chapter 411 of the Florida Statutes. The Early Learning Coalition of Seminole was incorporated in 2000. This coalition serves one county, is located in central Florida, and is a suburb of neighboring Orlando. There are approximately 251 funded early learning care givers currently working within the county. The coalition serves 2,537 School Readiness (SR) children and 2,938 Voluntary Prekindergarten (VPK) children. The coalition employs six staff members consisting of Executive Director, Executive Assistant, Quality Enhancement Specialist, Director of Community Affairs, Provider Services Coordinator, and Fiscal

Specialist. The governing board is made up of 19 members. The coalition sub-contracts the Child Care Resource and Referral services, School Readiness services, and Voluntary Prekindergarten services to one vendor, Community Coordinated Care for Children of Orlando, Inc. (4C Orlando). See Exhibit I-1 for the organizational structure of the coalition board.

**Exhibit I-1:
Early Learning Coalition of Seminole Organizational Structure**



Source: The Early Learning Coalition of Seminole

Scope and Methodology

Florida law requires the Agency for Workforce Innovation (AWI) to monitor and evaluate the performance of each early learning coalition’s administration of the school readiness and voluntary prekindergarten education program.¹ The AWI Office of Early Learning (OEL) developed performance expectations as a management resource for reaching the highest level of service delivery for the children of Florida. These expectations provide a framework for measuring program effectiveness to ensure that the children of Seminole County are served in safe and nurturing environments and receive appropriate developmental support so they are ready to learn when they reach kindergarten. The performance expectations include a mixture of indicators relating to compliance with state and federal laws and regulations, as well as indicators for additional activities that could assist early learning coalitions in maintaining high quality programs and operations.

To measure the extent to which the Seminole coalition is meeting these expectations, the OEL review team interviewed the coalition executive director, coalition staff, board members, parents, providers, and personnel from 4C Orlando. The team examined the various documents, such as the coalition’s contract with 4C Orlando, board meeting minutes, mini-grant program guidelines, provider agreements, and coalition reports. The team also conducted a review of client files for both the school readiness and VPK programs.

¹ s. 411.01(4), Florida Statutes.

1

Governance and Operations

Brief and Background

Summary

Overall, the Early Learning Coalition of Seminole (the coalition) uses effective policies and procedures to govern coalition operations. The coalition has an effective board and committee structure that facilitates decision-making and information sharing. In addition, the coalition's executive leadership exercises effective oversight of financial and programmatic operations.

While the coalition's governance procedures are generally effective, the OEL review found areas where coalition operations could be improved. Specific findings or areas for improvement are:

- The coalition does not maintain sufficient information technology security documentation,
- The coalition did not define an appropriate term limit for some coalition board members, and
- For fiscal year 2005-2006, the Seminole coalition exceeded administrative spending limits for the VPK program by a small margin.

Background

The Seminole coalition's leadership structure is based on the standard "corporation not for profit" structure that is legally defined in chapter 617 of the Florida Statutes. The nineteen (19) member board of directors serves as the policy making entity that delegates authority to the coalition's executive director. Only one board member is not a resident of Seminole, with three (including the board chair) of the resident board members being appointed by the Governor, and the remaining being selected and/or appointed according to s. 411.01, F.S. Membership composition includes representatives from the private and public sectors.

The experience level of the current board membership ranges from 7 months to 5 years of participation. At the time of the on-site monitoring review, the term of two experienced board members was scheduled to expire in September 2006. Subsequently, one of those board members expressed intentions of seeking a second term. Exhibit 1-1 depicts the board membership as it was at the time of the on-site review.

**Exhibit 1-1:
Early Learning Coalition of Seminole board membership as of August, 2006**

| Board Member | Mandated by s. 411.01, F.S. | Voting Status | Position/End of Term |
|--------------------|-----------------------------|---------------|---|
| Michael Gotschall | Yes/appointed by Governor | Voting | Chair-Private Sector/April 2009 (4 year term) |
| Bob O'Malley | Yes/appointed by Governor | Voting | Private Sector/April 2008 (3 year term) |
| Elizabeth Dorworth | Yes/appointed by Governor | Voting | Private Sector/April 2007 (2 year term) |
| Cheryl Salmon | Yes | Voting | DCF Representative/Seated until replaced |
| Marjorie Murray | Yes | Nonvoting | School District/Seated until replaced |
| Joyce Hinton | Yes | Voting | Regional Workforce Board/Seated until replaced |
| Rosemary Zigmund | Yes | Voting | Health Department/Seated until replaced |
| Suzanne Tesinsky | Yes | Voting | Community College/Seated until replaced |
| Dick Van Der Weide | Yes | Voting | County Commission/Seated until replaced |
| Roger Popp | Yes | Nonvoting | Head Start Director/Seated until replaced |
| Tamara Tener | Yes | Nonvoting | Private Child Care Provider/September 2007 (4 year term) |
| Shannon Chambley | Yes | Nonvoting | Faith Based Child Care Provider/September 2008 (4 year term) |
| Linda Stone | Yes | Nonvoting | Representative of programs for children with disabilities/September 2009 (4 year term) |
| Patricia Frank | Conditional | Nonvoting | Central Child Care Agency/Seated until replaced |
| Brent Adamson | Yes | Voting | Treasurer-Private sector/September 2007 (4 year term) |
| Sylvester Chang | Yes | Voting | Private sector/September 2006 (4 year term) |
| Edwin Wright | Yes | Voting | Private sector/September 2007 (4 year term) |
| Larry Martin | Optional | Voting | Professor and Director of Center for Community Partnerships, University of Central Florida/September 2006 (4 year term) |
| Velma Williams | Optional | Voting | City Commissioner, Sanford, FL/September 2007 (4 year term) |

Source: Early Learning Coalition of Seminole

The executive director, Karen Willis, was hired by the Seminole coalition as a consultant in 2003 and officially assumed the role of executive director in 2005. She is a graduate of Valparaiso University with a Bachelor of Arts degree in Sociology and a Masters degree in Public Affairs from Indiana University. Her background includes experience in designing, managing, and administering human service programs.

The executive director is the chief executive officer of the board and considered an employee of the coalition. This position is responsible for carrying out the day-to-day operations of the coalition. The primary service delivery components of the coalition's early learning programs are administered via a contract with Community Coordinated Care for Children, Inc. (4C Orlando). Exhibit 1-2 on page 4 illustrates the coalition's current organizational structure.

Methodology

The OEL developed a series of performance expectations for early learning coalition governance and operations (presented in Exhibit 1-2). Review team staff examined the extent to which the Seminole coalition is meeting these expectations. The performance expectations include a mixture of indicators relating to compliance with state and federal laws and regulations, as well as indicators for additional activities (or best practices) that could assist early learning coalitions in maintaining high quality programs and operations.

To determine the extent to which the coalition is meeting these expectations the review team examined documents that chronicled and supported board operations for fiscal year 2005-2006. The team also conducted on-site interviews with coalition board members and the executive director to ascertain their general knowledge of coalition governance and executive responsibilities.

Exhibit 1-2: Performance Expectations for Governance and Operations

- 1 Each early learning coalition clearly defines the roles and responsibilities of the board and the executive director in order to promote effective relationships.
 - 2 Each early learning coalition has an effective committee structure that facilitates decision-making, improves information sharing, and incorporates additional expertise as needed.
 - 3 Each early learning coalition organizes efficient board meetings.
 - 4 Each early learning coalition conducts board meetings that are accessible to the public.
 - 5 Each early learning coalition clearly defines its organizational structure, including procedures to effectively manage coalition personnel.
 - 6 Each early learning coalition's administrative funding allocations ensure that the board operates efficiently.
 - 7 Each executive director and early learning coalition board exercise effective oversight of the coalition's financial operations.
 - 8 Each executive director and early learning coalition board exercise effective oversight of the coalition's programmatic operations.
-

Findings and Recommendations

Performance Expectation 1: Each early learning coalition clearly delineates the roles and responsibilities of the board and the executive director in order to promote effective working relationships.

To ensure the success of the School Readiness and Voluntary Prekindergarten Programs, coalitions must have an effective executive leadership structure. Specifically, coalitions must have a constructive and trusting relationship between their boards and executive directors. The relationship is in jeopardy when the parties do not understand or fail to adhere to their distinct roles in the governance process. Thus, coalitions should have mechanisms in place to maintain a distinct separation of roles and responsibilities between the coalition board and the executive director.

Policies and procedures should also define the roles and expectations of the executive director and board operations. The board should be the policy-making entity for the coalition, and the executive director should have the primary responsibility for implementing and managing these policies. All major policies should be implemented with the board's approval. A coalition may use both formal and informal mechanisms to ensure that each entity adheres to its proper roles and responsibilities. At a minimum, a coalition should establish clearly written bylaws and policies that comply with state and federal statutes regarding these roles and responsibilities.

The Seminole coalition has established policies and procedures to promote an effective working relationship for its executive leadership.

Overall, the Seminole coalition exercises effective executive leadership over coalition operations. The coalition's bylaws exhibit a standard level of comprehensiveness that enables the board to exercise the proper authority without hampering daily operations. The coalition has an excellent approach to training or orienting new board members and has engaged in strategic visioning and governance development. The board has also implemented an evaluation process that links the board's overall performance with the elements outlined in its approved plan. This may set a new standard for board self-evaluation if this process is used as proposed. However, as discussed below, the review team identified some areas relating to board membership terms and information security that could be improved.

The Seminole coalition has not established an appropriate term limit for Board of County Commissioners' representative to the coalition board.

The county commission appointee is listed as having an indefinite term limit (or "seated until replaced") on the board's membership roster. Although this position is mandated by law, it is not an ex officio position. Thus, the appointee must be appointed to the position, and the appointment should be subject to definite term limits as defined in OEL policy².

² OEL policy reference: OEL File 206.01(5)

Although the Seminole coalition uses a number of ad hoc methods to recruit new board members, the coalition board does not have a recorded or formal strategy for ongoing recruitment.

The executive director indicated that it continues to be “challenged to have a ‘bench’ of individuals awaiting appointment to the board.” The executive director indicated that the coalition uses a number of ad hoc methods to recruit new board members including the use of local professional newsletters, the regional civic leadership, and local economic development groups. However, the coalition board has not developed a formal strategy for recruiting new board members, particularly private sector members. Review of board/committee meeting minutes found that two of the board members (Sylvester Chang and Larry Martin) are expected to leave in September 2006. On-site interviews confirmed Mr. Chang’s anticipated departure. Dr. Martin has agreed to accept an additional term.

The Seminole coalition should ensure that all appropriate staff sign and understand agreements relating to information security.

At the time of this review, the Seminole coalition’s executive director did not have dated and signed Security Agreement Forms for all (coalition) personnel who access coalition data as required by OEL policy.³ During the on-site interview the executive director stated that the security agreement form is the responsibility of 4C Orlando. The executive director further stated that all of the signed security forms were at the 4C. Although the staff at the coalition have access to the Enhanced Field System (EFS) and thus coalition data, no security agreements were on record.

Recommendations:

The OEL recommends that the Seminole coalition:

- **Ensure that its board roster complies with policy. Guidance on term limits of appointed members should be made clear in the bylaws;**
- **Formulate and adopt both short term and long term marketing/recruitment plans that will target prospective members that have optimum credibility and influence in the service delivery area. The plan may include an executive/business level awareness campaign that could be used to compliment the coalition’s already established “Stakeholder Education Taskforce.” The plan should consider current membership term expiration and Governor Appointee nominations; and**
- **Maintain a copy of the signed security agreements at the coalition office for each of the coalition staff members who have access to OEL data.**

Performance Expectation 2: Each early learning coalition board has an effective committee structure that facilitates decision-making, improves information sharing, and incorporates additional expertise as needed.

³ OEL policy reference: FPSR-IM-LD-03-01

Using committees is a crucial component for the early learning coalitions. Although the coalition relies on the board to address and make major policy decisions, effective committees can facilitate decision-making, improve information sharing, and incorporate additional expertise as needed between board meetings. The board may form committees to address key components of the coalition, such as the coalition plan and programmatic areas, administrative and fiscal issues, board membership and officers, community outreach and partners, and quality initiatives. Utilization of such committees gives board members, childcare providers, community agencies, and parents the opportunity to become more educated and involved before the board makes major decisions.

The Seminole coalition has an effective committee structure for conducting coalition business.

Overall, the Seminole coalition's board committee structure is appropriate for the current level of services being delivered by the coalition. Board meeting minutes and interviews provide evidence of four standing committees: executive, finance, planning and program, and a nominating committee. Meeting minutes indicate that the committees make preliminary decisions on matters that are representative of the committee's subject area.

Performance Expectation 3: Each early learning coalition organizes efficient board meetings.

The primary goal of all early learning coalition board meetings should be to make sound decisions on policy issues presented during a particular meeting. To meet this performance expectation, the coalition board and staff should have mechanisms to ensure that board and committee meetings run efficiently, and policy discussions and decisions are open and accessible to the public. It is also important that board meetings be held often enough to keep up with the business of the coalition.

In order to maintain effective meetings, agendas should help the board to clearly facilitate decisions and to assist the meetings in operating efficiently in the time allotted. When meetings last consistently longer than the time allotted, it may indicate that appropriate mechanisms are not in place or are ineffective.

The Seminole coalition organizes efficient and effective board meetings.

The Seminole coalition has a very comprehensive and consistent approach for managing board meetings. For example, the coalition has implemented an effective method for presenting agenda items for board meetings. This approach contributes greatly to the effectiveness and efficiency of the board meetings and should be shared with coalitions throughout the state. Specifically, the coalition adopted a briefing format that uses six different approaches to disseminate board business items:

1. **Consent Agenda Brief:** provides a description of all items that have been passed by the committees and ready to be voted on by the full board.
2. **Information Brief:** provides a description of actions (from external entities) and how those actions will impact the coalition's service delivery.
3. **Presentation Brief:** provides a description of formal presentations that will be delivered to the board.

4. **Discussion Brief:** provides a description of discussion items for the board and/or committee to act upon.
5. **Action Brief:** provides a description of items that require board action.
6. **Project Status Brief:** provides a description of the current status of coalition projects that have been implemented.

These briefing narratives are outlined on the board meeting agendas and are an effective and efficient way of standardizing and facilitating the board and committee meetings. The agenda and briefing narratives also provide the necessary framework and background that would empower the board to make informed decisions about the early learning programs under its stewardship.

Performance Expectation 4: Each early learning coalition conducts board meetings that are accessible to the public.

Board members and coalition staff should ensure that the coalition notices public meetings through various avenues and makes them accessible and open to the public. According to the Florida Sunshine Law⁴, a record of meeting notices is also necessary for audit purposes. For example, boards must provide reasonable notice for all meetings, depending on the details of the situation. The coalition must give notice of such meetings at a specific time and in such a manner as to enable the media and the public to attend.

The law supports the use of various forms of meeting notification. For example, the coalition could achieve this by not only using local newspapers, the Florida Administrative Weekly and the coalition website, but also by posting in other locations, such as the public library and the health department, to reach a broader community population. In addition, the coalition could schedule meetings at times that are not in conflict with the work hours of the majority of the public.

The Seminole coalition's board and/or committee meetings are scheduled at times and places convenient to the public.

The Seminole coalition posts notices of board and committee meetings in the Orlando Sentinel and on the coalition's official website. The meetings are held at the Seminole County Public Schools Education Support Center, which is centrally located in the northern section of the county with access to two major thoroughfares.

Performance Expectation 5: Each early learning coalition clearly defines its organizational structure, including procedures to effectively manage coalition personnel.

It is important for coalitions to structure the roles and responsibilities of each organizational unit in order to effectively operate and manage the coalition and personnel. To meet this performance expectation the coalition board should have mechanisms to ensure that the administrative and daily operational functions of the coalition are effective and efficient. This process should be reviewed and updated when necessary to ensure accurate and current information and understanding of the processes.

⁴ s. 286.011, F.S.

The Seminole coalition clearly articulates its personnel policies.

The Seminole coalition clearly states its personnel policies on hiring, termination, evaluation, and compensation in its employee handbook and operational and procedures manual. These documents appropriately state requirements for adhering to state and federal labor laws and the maintenance of confidential personnel records. The coalition has also established performance expectations for all staff as well as contractors.

Performance Expectation 6: Each early learning coalition's administrative funding allocation ensures that the board operates efficiently.

Florida law stipulates that, as part of the plan review and approval, the Agency for Workforce Innovation shall require that the total administrative expenditures not exceed 5%. To meet this requirement each early learning coalition should ensure that their approved administrative budget does not exceed the limits established by law and does not use non-direct service funding for general administrative functions. Coalitions should comprehensively and regularly review and approve its use of administrative funding and staff levels through mechanisms, such as coalition stakeholder input and reasonable assessment at the committee level.

The team's review of board meeting packets and finance committee reports found that the executive director is very effective and comprehensive when presenting the coalition's financial matters to the board. Status reports of budget line items were routinely provided to the board in a timely manner.

While the Seminole coalition maintained administrative spending for the School Readiness program within required limits, it exceeded administrative spending limits for the VPK program by a small margin.

Based on information obtained from with the Seminole coalition's grant analyst, the review team found the Seminole coalition is meeting spending limitations for the school readiness program as established by s. 411.01(9)(d), F.S., OMB Circular A-110, and the OEL. Administrative expenditures for the fiscal year 2005–2006 for school readiness were 3.4%. For the current fiscal year, the grant analyst projected that the coalition's school readiness expenditures will be approximately 3.7%.

However, the coalition exceeded administrative spending limits for VPK by a small margin. Specifically, the General Appropriations Act establishes a 5% administrative spending limit for VPK. The Seminole coalition's administrative expenditures for fiscal year 2005-2006 were 5.07%.

Performance Expectation 7: Each executive director and early learning coalition board exercises effective oversight of the coalition's financial operations.

Coalitions maintain sole responsibility for overseeing all programmatic and fiscal records and retain direct management of this process. As such, it is important that coalitions have comprehensive and consistent procedures for managing all administrative functions and records. To be effective, this process should ensure that the board and staff receive ongoing training on programmatic requirements and financial provisions to assist them in understanding the VPK/school readiness programs. In addition, the board and executive director should have input into the development of essential programmatic elements contained in the coalition's plan and should have a system in place to relate it to the financial provisions of the grant award.

The Seminole coalition exercises effective executive oversight over coalition financial operations.

Based on interviews with board members and other coalition staff, reviews of board meeting packets and finance committee's reports, the OEL review team found the board to be well-informed and effective in its oversight of the coalition's financial operations. As the primary fiduciary agent at the staff level, the executive director also exercises a high level of competency in the analysis and presentation of the coalition's financial status and the execution of its financial plan.

While coalition oversight is effective, the OEL review team found several issues in contracts and grants management (See Chapter 2) that could negatively affect the coalition's ability to oversee financial operations if not addressed in a timely manner. Specifically, the coalition conducted insufficient monitoring of its service provider (4C Orlando) to ensure that contracted services were being delivered as intended.

Performance Expectation 8: Each executive director and early learning coalition board exercises effective oversight of the coalition's programmatic operations.

To ensure effective oversight of all programs, the coalition must provide board members with ongoing training and updates of information regarding the programmatic requirements of VPK and school readiness programs. Coalition boards and executive directors should also have input into the development of the coalition's school readiness plan, including assessment activities, curriculum issues, the monitoring process, family support services, service priorities, professional development for providers, and quality initiatives.

In addition, coalitions should regularly receive and review programmatic reports with a focus on correlation and compliance with the coalition's plan. This will enable the board and executive director to have input into the development of essential programmatic elements contained in the coalition's plan and to manage the fulfillment of the objectives as stated in the plan.

The Seminole coalition exercises effective executive oversight over coalition programmatic operations.

Based on interviews with board members and coalition staff, and reviews of board meeting packets and committee reports, the OEL review team found the board to be well-informed and effective in its oversight of the coalition's programmatic operations. For example, the executive director regularly receives and reviews various program-related reports from 4C Orlando. These reports include information on the number of (and results) children receiving developmental screenings and assessments and the results of school readiness provider onsite evaluations conducted by 4C Orlando.

While coalition oversight is effective, the OEL review team found several issues in contracts and grants management (See Chapter 2) that could negatively affect the coalition's ability to oversee programmatic operations if not addressed in a timely manner. Specifically, the coalition conducted insufficient monitoring of its service provider (4C Orlando) to ensure that contracted services were being delivered as intended.

2 Contract & Grants Management

Brief and Background

Summary

While the Early Learning Coalition of Seminole (the coalition) has established effective policies and procedures for awarding contracts and procuring goods and services, it has not fully implemented a process for monitoring its contracted service provider. Since the coalition conducts major portions of programmatic operations through contractual arrangements, the staff needs to implement an effective onsite monitoring process to ensure that program services are delivered in a manner consistent with contracted purposes and requirements. Other major findings or areas for improving contract management processes and practices include:

- The Seminole coalition executive director functioned as the contract manager during the review period. Since major portions of the coalition's operations are conducted through contractual arrangements, not separating executive responsibilities from contractual duties creates a potential for corporate governance problems, including the potential for conflict of interest.
- While the Seminole coalition maintains its current records in a readily accessible manner, staff members indicated that the coalition's corporate financial records for fiscal years 2002–2003, 2003–04, and 2004–05, are maintained by the respective fiscal agents, and thus not readily accessible by coalition staff. As such, the coalition is in violation of its grant agreement with the AWI, which requires coalitions to maintain complete control of its records, keeping them in a location that is readily accessible for review by the public, and immediately accessible to the early learning coalition staff.

Background

The Seminole coalition enters into contractual agreements with a number of qualified service providers for various goods and services rendered for operational purposes. The primary service delivery components of the Seminole coalition's early learning programs are administered via a contract with Community Coordinated Child Care, Inc. (4C Orlando) of Orlando.

Exhibit 2-1 is a comprehensive list of each contract in effect during the review period, the amount of each contract, and the services rendered.

Exhibit 2-1:**Seminole Coalition Contracts – The majority of the coalition’s services are implemented through contractual agreements with service providers**

| Service Provider | Contract Period | Contract Amount | Services Provided |
|--|-------------------------|---------------------------------|--|
| Community Coordinated Care for Children, Inc. (4C Orlando) | 7/1/2005-6/30/06 | \$14,794,792 | Fiscal and program functions |
| Kaplan Early Learning Company | 1/14, 1/21 and 1/28/06 | \$15,854 | Training |
| Ronald Spain | 12/1/05-6/30/06 | \$35/hr | Accounting services |
| Shuffield/Lowman | 10/24, and 3/05-6/30/06 | OPEN | Legal services |
| Joe Alberts | 7/1/05-6/30/05 | \$45/hr | IT services |
| The Children’s Forum, Inc. | 4/30/06-6/30/06 | \$10,200 | Marketing strategies and tools |
| Bristol Group | 1/21/06-6/30/06 | \$4,687.50 | Consulting services |
| Central Florida Association for Family Child Care | 4/26/06-6/30/06 | \$3,750 | Technical support for the 2006 National Association for Family Child Care (NAFCC) conference |
| Child Development Education Alliance (CDEA) | 9/6/05-10/24/05 | \$2,200 | Training |
| Janis Nakagama | 3/4/06 | \$75 | Training |
| Cherry Bekaert & Holland | 7/1/05-6/30/06 | \$5900 audit; \$800 Form 990 | Auditing services |

Source: The Early Learning Coalition of Seminole

Methodology

The OEL developed a series of performance expectations for early learning coalition contract and grant administration (presented as Exhibit 2-2). Review team staff examined the extent to which the Seminole coalition is meeting these expectations. The performance expectations include a mixture of indicators relating to compliance with state and federal laws and regulations, as well as indicators for additional activities that could assist early learning coalitions in maintaining high quality programs and operations.

To determine the extent to which the Seminole coalition is meeting these expectations, the review team examined all contracts for fiscal year 2005–06. Specifically, the team reviewed the contracts and subcontracts to ensure compliance with s. 287.057, F.S., and to ensure the inclusion of appropriate contract language and description of services and deliverables. The team interviewed the Seminole

coalition executive director and other staff to determine their expertise in contract management. Finally, the team interviewed various Seminole coalition board members to determine their general knowledge and awareness of the contract process, including all applicable federal and state laws and regulations, and early learning coalition policies and procedures.

Exhibit 2-2:

Performance Expectations for Contract and Grants Management

- 1 Each early learning coalition has policies and procedures to ensure effective and efficient procurement of commodities and services and is using these policies to ensure compliance with chapter 287, F.S.
 - 2 Each early learning coalition has policies and procedures to ensure that the awarding of a contract is fair, equitable, cost-effective, and compliant with chapter 287, F.S., and administrative rules.
 - 3 Each early learning coalition has assigned an individual for managing coalition contracts.
 - 4 Each early learning coalition has policies and procedures in place to monitor both administrative and programmatic aspects of all contracts.
-

Findings and Recommendations

Performance Expectation 1: Each early learning coalition has policies and procedures to ensure effective and efficient procurement of commodities and services and is using these policies to ensure compliance with chapter 287, F.S.

Effective and efficient contracting is crucial to successful coalition operation. To ensure the effective and efficient procurement process, early learning coalitions must have in place policies and procedures to ensure compliance with state and federal laws and regulations, and specifically with s. 287.057, F.S., which provides that "...unless otherwise authorized by law, all contracts for the purpose of commodities or services in excess of the threshold amount provided in s. 287.017, F.S., for CATEGORY TWO shall be awarded by competitive sealed bidding." Early learning coalitions must have written policies and procedures in place and actively followed in order to comply with the rules and regulations of the Florida Statutes.

To ensure compliance with Florida Statutes, early learning coalitions must maintain all documentation relating to the contract and/or grant award selection process including the method of selection used. Without the proper documentation, there will be insufficient evidence that the proper procedures were followed according to chapter 287, F.S., and AWI/OEL policies. Failure to adhere to the requirements could result in conflicts of interest, bid protests, and poor quality work performed by the service provider.

The Seminole coalition has established effective policies and procedures for procuring goods and services.

The Seminole coalition has successfully designed and implemented a procurement process that generally complies with state and federal rules and regulations. The review team conducted a review of procurement files to determine if procurement policies were being consistently applied by coalition staff. Based on this review, the team concluded that staff had successfully enacted most coalition operating policies and procedures pertaining to procurement. In addition, the Seminole

coalition's procurement files were organized in such a manner to make the material effortless to track and easy to comprehend.

Performance Expectation 2: Each early learning coalition has policies and procedures to ensure that the awarding of a contract is fair, equitable and cost-effective and compliant with chapter 287, F.S., and administrative rules.

Florida law and federal procurement regulations govern funds that are allocated for School Readiness and Voluntary Prekindergarten programs. Early learning coalitions must ensure that their procurement process complies with s. 287.057, F.S., to guarantee the integrity of the contracts and grant awards. Each early learning coalition must maintain a file with all documentation collected during the procurement to be able to verify that all rules and regulations have been observed.

Other documents that contribute to the credibility of the early learning coalition's procurement process include: proof of liability insurance, invoices, audits, and tracking of deliverables. Florida law and federal procurement regulations govern funds that are allocated for School Readiness and Voluntary Prekindergarten programs. Not abiding by these regulations could result in audit findings, disputes, and/or mandatory corrective actions.

While the Seminole coalition has generally established an effective contract management system, its process for maintaining and accessing historical fiscal records should be improved.

The Seminole coalition has established an effective contractual management system that includes all pertinent policies and procedures to ensure compliance with federal and state regulations, specifically s. 287.057, F.S. However, the coalition is not maintaining certain fiscal records and prior contracts in accordance with ss. 119.021, 411.011, and 1002.73, F.S., and the grant award agreement with the AWI.

The AWI grant award agreement requires early learning coalitions to establish and maintain records and documents in accordance with generally accepted accounting procedures and practices. The agreement requires: (1) such records and documents to be maintained by the early learning coalition and any subcontractor for a period of five years from the end of the agreement period, (2) coalitions maintain total and complete control of its records, and keep them in a location that is readily accessible for review by the public, and (3) the records remain immediately accessible to early learning coalition staff.

During the site visit certain fiscal records relating to the Seminole coalition contracts were requested by the review team. Overall, the recent contract documents were readily available for review. Coalition staff indicated that some of the coalition's corporate financial records are maintained by the respective primary service providers (prior fiscal agents) and not readily accessible. While the agreements with the service contractors note that the service contractor shall be responsible for maintaining the records in accordance with state law, it is the OEL's contention that these records remain in the direct custody of the Seminole coalition as required by the AWI agreement. It is preferred that the coalition retain its corporate financial records in their original format. Where this is not feasible, they should, at a minimum, retain copies of these records.

Recommendation:

To improve contract management, the OEL recommends that the Seminole coalition obtain all records and documents pertaining to the operation of the coalition from its prior fiscal agents and make this information readily available as prescribed by statute for review purpose and accessible to the general public. The Seminole coalition should continue to maintain direct and immediate access to this information for the legally prescribed period of time.

Performance Expectation 3: Each early learning coalition assigns an individual responsibility for managing coalition contracts.

In accordance with s. 287.057(15) F.S., for each contractual services, the agency (early learning coalition) shall designate an employee to function as contract manager for each services contract, be responsible for enforcing the performance of the contract terms and conditions, and serve as liaison with the contractor. The position of contract manager should be assigned to a staff member who has the training and expertise to successfully perform the functions and responsibilities of the position. The primary responsibilities of the contract manager is to oversee the bid process, ensure compliance on the terms and conditions, conduct monitoring activities of the service provider and handle all correspondence between the early learning coalition and the service provider. Results of these actions, as well as the status of the contracts, should be reported to the early learning coalition board on a recurring basis.

The Seminole coalition's executive director functions as the contract manager, which is not an optimal arrangement given the size of the coalition's service area and the significant amount of services delivered through contractual arrangements.

The executive director indicated that she functions as the contract manager for the Seminole coalition with operational assistance from the fiscal specialist. Major portions of coalition operations are conducted through contractual arrangements with several service providers. In the Seminole coalition, the individual having primary control of the coalition's operations also manages these contracts. Not separating operations responsibilities from contract management duties creates a potential for corporate governance problems including the potential for conflict of interest. To ensure proper contract management by the coalition, the OEL recommends that the contract manager position be assigned to an employee other than the executive director.

Recommendation:

The OEL recommends that the Seminole coalition consider assigning the contract manger responsibilities to an employee other than the executive director. This employee should have sufficient skills, knowledge, and abilities to satisfactorily perform contract administration roles and responsibilities.

Performance Expectation 4: Each early learning coalition has policies and procedures in place to monitor both administrative and programmatic aspects of all contracts.

To ensure that contracted services meet the terms and conditions of the contracts and grant awards, early learning coalitions must actively monitor the performance of the service provider. Sound contract management is critical to providing and/or overseeing the quality of services. Early learning coalitions must demonstrate that executive leadership has developed systems that support sound contract and financial management practices at all levels of the organization. Each early learning coalition must actively monitor the terms and conditions of the contract and grant awards.

The contract and grant awards manager is responsible for determining and documenting that all contract and grant award deliverables are being met by the service provider. Early learning coalitions must monitor service providers to ensure that they are meeting contractual obligations and delivering high quality services to the children and families receiving services. In addition, early learning coalitions should regularly receive and analyze reports from providers on the quantity and the quality of all services delivered by the early learning coalition and its service providers. Without monitoring contracts and grant awards, early learning coalitions cannot be certain that deliverable requirements are being met or that they are receiving quality services for expended funds.

Although the Seminole coalition's monitoring process is comprehensive and well designed, it has not been fully implemented and thus cannot ensure that services are being delivered in a manner consistent with contractual obligations.

The Seminole coalition has developed a proper tool to satisfy the Seminole coalition's monitoring requirement and established a monitoring schedule whereby the tool would be applied. The tool was designed to ensure compliance with the terms and conditions of the service provider contracts. However, the Seminole coalition could not document that it had fully implemented the monitoring process at the time of the review. The executive director indicated an awareness of this issue and that plans were pending for adherence to the monitoring schedule. Proper application of this monitoring tool will satisfy the monitoring requirements set forth by the Seminole coalition's procedures as well as those of the state statutes and the AWI agreement.

Recommendation:

The OEL recommends that the Seminole coalition fully implement its comprehensive monitoring process to ensure that program services are delivered in a manner consistent with contracted purposes and requirements.

3

Child Care Resource & Referral

Brief and Background

Summary

Overall, the Early Learning Coalition of Seminole (the coalition) is implementing an effective resource and referral program that meets most of the Standard Levels of Service established by the AWI-Office of Early Learning Child Care Resource & Referral (CCR&R) Network. While the overall quality of the program is high, the coalition is not sufficiently addressing several of the required standards. Specifically, the review team found that the provider information maintained by the coalition's service provider for resource and referral is not always accurate, complete, and up-to-date. When the information given to parents is inaccurate or not current, it inhibits their ability to make informed choices about available providers and services. Other major findings or areas for improving resource and referral services include:

- The Seminole coalition's contracted service provider does not have a clear walk-in policy posting the availability of resource and referral services in its lobbies.
- The Seminole coalition's website does not address resource and referral services or provide contact information for the program, which could hamper public and parent awareness of the program and the services available.
- The Seminole coalition has not monitored its service provider to ensure that the resource and referral program is delivered in a manner consistent with contracted purposes and requirements.

Background

Child Care Resource and Referral (CCR&R) should serve as the "Front Door" to all services offered through early learning coalitions and/or their contracted service provider. All parents, regardless of socio-economic status seeking child care assistance, should receive CCR&R services. Parents should be offered the option of receiving assistance with finding child care, and information on making an informed decision, as well as additional information and community resources as appropriate. Parents who do not need assistance finding child care will still benefit from educational materials provided through CCR&R, which includes quality indicators to look for when selecting a care location, and information on health, safety, and curricula to make parents aware of minimum standards.

Parents contacting the coalition for assistance with the cost of child care can benefit from the CCR&R process. Each CCR&R specialist should be prepared to explain various types of care (e.g., family child care, centers, school readiness, faith-based providers, VPK, Head Start, nanny/au pair, etc.). All coalitions/contracted service providers should strive to provide R&R services to all families placed on the wait list. Customers who are offered R&R upon application for services are provided with options and resources in addition to wait list placement.

Families enrolling their children in the Voluntary Prekindergarten (VPK) program may request a complete list of all providers in their area offering VPK services. A complete list of VPK providers may be overwhelming for the family to review. To make the choice easier, parents may contact their local CCR&R office to receive a customized list of VPK providers in their area that appear to meet the needs of their family. A search can be conducted based on curriculum, hours/days of operation, environment, and transportation availability in addition to several other search options. This permits parents to fully explore and locate a child care location to meet their child's developmental needs.

The coalition contracts the Child Care Resource and Referral (CCR&R) program with Community Coordinated Care for Children (4C Orlando). The Coalition budgeted \$59,918 for CCR&R out the total contract amount of \$15,068,102 for fiscal year 2005–2006. The contract terms include: providing child care consumer information, establishing a toll-free telephone system, maintaining and managing a comprehensive database of all early care and education caregivers and community resources in Seminole County, among other aspects of the CCR&R program.

At the time of the monitoring visit, 4C Orlando had assigned staff responsibility for CCR&R contracted activities with the exception of inclusion services. The 4C Orlando employs a CCR&R coordinator and two CCR&R specialists assigned to Seminole County. The coordinator and one specialist are housed in the 4C Orlando main office in Orlando, outside the Seminole County service area, with one specialist located in a satellite office within the service area (Sanford) where walk-ins and face-to-face appointments can be held.

Methodology

The AWI developed a series of indicators and standards (known as the standard levels of service) that local coalitions should meet in delivering resource and referral services to families and children. These standards address issues, such as, customer service expectations, staff training and certification, consumer services and information, and database maintenance. See Exhibit 3-1 for a more detailed description of the standard levels of service.

To determine the extent to which the Early Learning Coalition of Seminole is meeting these expectations, the review team interviewed coalition board members, coalition employees, and subcontracted agency employees who actually deliver the CCR&R services and/or maintain the provider data information within EFS. The team also observed CCR&R telephone and face-to-face interviews and reviewed EFS data for timeliness and accuracy. Forms and documents provided in the “parent packet” were also reviewed. Finally, the team reviewed coalition and service provider websites.

Exhibit 3-1: Excerpts from the Standard Levels of Service for Resource and Referral

CCR&R Specialist Orientation — R&R Specialists and any other staff performing R&R functions (including but not limited to School Readiness staff/Early Learning Coalition staff), must receive an orientation by the R&R Coordinator, or designated trainer, prior to conducting family interviews and generating referrals (in person or on the telephone), including, but not limited to the following:

- Receive one-to-one training in database use and practice entering customers and generating referrals for at least one day.
 - Review R&R Reference Guide, including how to explain all early learning options and types of curricula before generating referrals.
 - Review SLS before generating referrals.
 - Shadow an experienced R&R Specialist for at least one day.
 - Be observed by the R&R Coordinator or designated trainer as they conduct a parent intake, including generating computer-based early learning referrals.
-

Consumers of CCR&R Services – General Access — R&R early learning referrals, consumer/education information and/or community resources must be offered to ALL customers, with children of all ages, seeking assistance either via telephone, in person, email, mail, or web. This includes, but is not limited to:

- Public (private pay) customers requesting referrals for the first time in the calendar year (initial referral) or customers requesting repeat referrals (updates) in the calendar year.
 - Customers requesting VPK information.
 - Customers seeking financial assistance (including School Readiness, Head Start, private scholarships, sibling discounts).
 - Customers requesting online referrals.
-

CCR&R Referrals – Family Information Packet — Anyone receiving R&R referrals via telephone, in person, email or online, must be sent/given an informational packet, no later than the second business day, containing the following:

- Cover letter, which must include the following information:
 - Disclaimer statement (these are referrals, not recommendations).
 - Suggestions on how the family can proceed with their search for a provider.
 - Phone number and location of licensing office.
 - Web site information for the state licensing database.
 - Invitation to call back if further assistance is needed.
 - Toll-free number to the CCR&R Network to comment on issues/concerns.
 - Summary, detail or abridged provider referral printout.
 - Current CCR&R Network 'Quality Checklist' for evaluating early learning programs.
 - Current CCR&R Network brochure 'A Family Guide for Selecting Quality Early Learning Programs.'
 - Information/resources on other family-specific needs, as appropriate..
-

Basic Consumer Information — Consumer information offered to all families includes, but is not limited to:

- Explanation of all early learning and school-age options: Centers (Licensed and Exempt), Faith-Based, Family Child Care Homes, Before/After school programs, School Readiness programs, VPK, Head Start, Early Head Start, Nanny/In-home care, and Summer Camps.
 - Explanation of types of regulations (e.g., licensed, exempt, registered).
 - How to review provider licensing files and access licensing web site.
 - How to choose a provider – what to look for, questions to ask.
 - Quality indicators (e.g., training, education, accreditation, CDA, Gold Seal, staff stability, adult/child ratio, group size, parent/provider communication).
-

Findings and Recommendations

Overall, the Seminole coalition has implemented an effective resource and referral program that meets most of the standard levels of service established by the AWI. The coalition has also met or gone above and beyond the standard levels of service by implementing and developing policies, training staff, sending their quarterly publication “The Source” to all families, hiring bilingual staff, and providing information on free immunizations to all families. The CCR&R staff is very knowledgeable and friendly and efficiently serves the clients that call or come in for child care referrals.

While the overall quality of the program is high, the Seminole coalition is not sufficiently addressing several of the required standards. These deficiencies could reduce the overall effectiveness of the coalition’s resource and referral program if not addressed in a timely manner.

The Seminole coalition’s contracted service provider does not post a clear walk-in policy for the availability of resource and referral services in its lobbies.

It is important for walk-in customers to be served in a friendly and efficient manner. The main function of the CCR&R program is to provide information to parents on quality child care (or other community resources) that best suits the needs of each family. The posted hours in the service provider’s lobbies address eligibility services only and only lists screening criteria required to obtain eligibility services. The CCR&R program does not require any documentation or screening for parents to receive referrals. This posted sign could be confusing for parents who walk in for referrals and could encourage them to leave without meeting the R&R Specialist. It may also encourage them to leave and return with unnecessary documentation, which may also upset a customer who may have had to take time off of work to meet with the R&R staff.

The Seminole coalition’s website does not address resource and referral services or provide contact information for the program.

A coalition’s website is a resource for parents to find information on many of the coalition’s programs and services. It is valuable to parents to be able to access a coalition website to find out the hours of operation, programs, community information, services provided, and information on providers. In addition, the coalition’s CCR&R website is required to have hyperlinks to other websites, such as: the OEL, DCF Licensing, Child Care Aware, and NACCRA. If the coalition cannot place this information on their website, contact information should be listed. The Seminole coalition’s website does not give information on the CCR&R program or contact information to reach the service provider. The coalition’s website is missing this information and does not link to the service provider’s website as well. However, 4C Orlando’s website provides all the required information for CCR&R services.

Improvements are needed to ensure that the provider information maintained by the Seminole coalition for resource and referral is accurate, complete, and up-to-date.

Each coalition or service provider is responsible for the maintenance of the Enhanced Field System (EFS). This database is required to be used by all coalitions in Florida. Each individual coalition is responsible for the accuracy of the information entered into the system. CCR&R programs are charged with administering an annual provider update. This update takes place annually and is sent to all child care providers in the system. The update includes rates, accreditation, codes, additional

services provided, and staff credentials. The information gathered from the providers is to be entered into EFS.

As part of the review, the team selected five service providers at random to check for accuracy and completeness of the records in the EFS system maintained by the Seminole coalition's service provider. Listed below are the records that were reviewed and what was found.

- **Observation 1** - Page Private School of Seminole Towne Center: active CCR&R provider, Rates have not been updated since 2000, and is listed as a Gold Seal center, though the code was not listed in the accreditation screen (this is a requirement for all Gold Seal providers).
- **Observation 2** – Royal Academy: active CCR&R provider, incomplete enrollment screen.
- **Observation 3** – S.S. Camp Casselberry: all records were complete.
- **Observation 4** – Ladybird Preschool Academy: enrollment screen missing codes, provider code is listed as “N”, affiliation screen is listed as “REG”, rates have not been updated since 06/28/05, and the staff qualification screen is incomplete.
- **Observation 5** – De Souza, Susanna Family Child Care Home (FCCH): all records were complete.

The accuracy of records in EFS is crucial for delivering the correct referrals to clients. Also, discrepancies in EFS also have a negative effect on the monthly and quarterly reports required by the Network office.

The Seminole coalition has not monitored its service provider to ensure that the resource and referral program is delivered in a manner consistent with contracted purposes and requirements.

As stated in Chapter 2, the Early Learning Coalition of Seminole has not fully implemented its monitoring process, which includes not monitoring the service provider's delivery of the CCR&R program. At the time of the review, the coalition's monitoring tool provided to OEL for the service provider did not address resource and referral services. As such, the coalition could not ensure that its CCR&R program is meeting the Standard Levels of Service.

The coalition should ensure that all programs managed by a contractor are meeting standards of performance set forth in the contract. This includes ensuring that the services are available, the staff is trained properly, phone numbers are in working order, phone number is advertised, and data is complete and accurate in EFS. This review should be thorough and documented to ensure that programs are providing quality services to the public.

Recommendations:

To meet the standard levels of service and improve its Child Care Resource and Referral Program, the OEL recommends that the Early Learning Coalition of Seminole:

- ***Change the current posted policy to reflect hours of operation and days for walk-in CCR&R clients.***

- *Update the coalition's website to include a link to the service provider's website where programmatic information on resource and referral services, contact information with phone numbers, and hyperlinks to other appropriate and required websites can be found.*
 - *Begin monitoring the service provider to ensure that the program is being delivered in accordance with contracted requirements. The coalition's monitoring process for CCR&R should also address the accuracy of data used to support the program.*
-

4 Community Outreach

Brief and Background

Summary

The Seminole coalition is effectively implementing strategies to improve community awareness of early education programs and to maximize available resources through collaboration with other organizations and agencies in its service area. Specifically, the coalition:

- Successfully uses a variety of methods to increase public awareness about the types of services available through the School Readiness and VPK programs.
- Collaborates with educational institutions in the community (i.e., local community colleges, universities, vocational or business institutions, the local school district) to provide training to coalition and service provider employees, as well as early childhood teachers, support staff and administrators.
- Collaborates with other community partners to increase operating efficiencies and maximize available resources. For example, through the creation of successful partnerships, the coalition receives monetary donations and in-kind services from the Seminole County School Board, United Way, and city government municipalities.
- Collaborates with community organizations that support unique populations through a referral system to partners, such as the Florida Department of Health (DOH), the Florida Department of Children and Families (DCF), and the Florida Diagnostic and Learning Resource System Child Find program (FDLRS).

While overall collaboration is effective, the Seminole coalition only marginally collaborates with community partners who offer services to children who are at-risk or in receipt of TANF funds. Specifically, the coalition could improve its community partnerships by developing interagency collaborative meetings with community agencies who serve at-risk children to ensure service delivery processes are seamless for their shared customers.

Background

Early learning coalitions are responsible for serving families in their service areas including those from diverse backgrounds. Family needs are as unique as their makeup, including differences in household income, English speaking skills, and families facing challenges related to children with disabilities and special health care needs.

Seminole county is home to almost 400,000 residents according to data from the 2004 Census Bureau, American Community Survey. Data from the U.S. Census indicates that 9.1% of the residents of Seminole County in 2003 were living below poverty level. The number of children under 5 years old in 2004 was approximately 24,400, representing about 6.1% of the population.

Currently, the geographic distribution of children receiving school readiness services is concentrated in the municipality zip codes of Sanford and Altamonte Springs. Further, a high percentage of adults living in these areas were self-identified as non-white according to Census 2000 data. Another noted demographic trend in Seminole County is the growing number of children from non-English speaking families. The 2004 Census data reported that 11% of residents were foreign born. Moreover, among those at least five years of age, 16% spoke Spanish and 37% spoke some other language, while 34% reported that they did not speak English “very well.”

According to the coalition’s proposed plan for 2006-2009, Seminole County Public Schools reports an increasing number of young children with disabilities and special health care needs. The most commonly noted areas of developmental delay or special need are in the areas of speech and language. This pattern is consistent with data taken from the coalition’s developmental screening results on which the most commonly noted needs were speech and language, fine motor, behavior and global delay.

Methodology

The OEL developed a series of performance expectations for community outreach efforts by early learning coalitions (presented in Exhibit 4-1). Review team staff examined the extent to which the Seminole coalition is meeting these expectations. The performance expectations include a mixture of indicators relating to compliance with state and federal laws and regulations, as well as indicators for additional activities (or best practices) that could assist early learning coalitions in maintaining high quality programs and operations.

To determine the extent to which the coalition is meeting these expectations, the OEL review team:

- Interviewed stakeholders in early care and education throughout the community including but not limited to the health department representative on the Seminole coalition board, the at-risk community partner administrator, the public school system board representative and members from other community partners.
- Conducted focus groups with parents and early childhood teachers.
- Interviewed Seminole coalition staff and staff of the 4C Orlando regarding established policies, procedures, and future needs for improving services to area families.
- Reviewed coalition meeting minutes and agendas and interviewed various board members.
- Reviewed training schedules, agendas and logs of participation that included training of coalition and contracted service provider staff on outreach strategies.

Exhibit 4-1: Performance Expectations for Community Outreach

- 1 Each early learning coalition and service provider shares information about available services.
 - 2 Each early learning coalition and service provider collaborates with educational institutions, such as local community colleges, universities, vocational or business institutions, and the school district to train child care program staff.
 - 3 Each early learning coalition collaborates with other community partners to increase efficiencies and to share available resources.
 - 4 Each early learning coalition demonstrates collaboration with community organizations and entities to support unique populations (e.g., migrants and children at-risk of abuse and neglect).
-

Findings and Recommendations

Performance Expectation 1: Each early learning coalition and service provider shares information about available services.

School Readiness and VPK programs cannot operate effectively as isolated programs, but should instead build upon existing services, working in cooperation with other community service organizations. Community partnerships can help the coalition make the best use of available resources and provide access to a wide-array of services for the whole family, including food, education, employment, and housing assistance, non-medical prenatal support services, and transportation. For example, each coalition should have an effective agreement in place with the local health department or another service provider to ensure that proper health screenings are conducted, tracked, and monitored for children birth to 5 years old.

Other community partners could include the Florida Diagnostic and Learning Resources System (FDLRS), the Florida Department of Children and Families (DCF), the Florida Department of Education (DOE), and the Regional Workforce Board (RWB). Failure to form such successful partnerships will limit the support available for parents and their children and will increase the likelihood of children not being academically prepared to enter kindergarten.

The Seminole coalition successfully uses a variety of methods to increase public awareness about the types of available services for VPK.

Based on a review of various print media distributed by the coalition, the review team found that the coalition is effectively providing information to parents and child care providers about the VPK program. The coalition did not provide evidence that it has implemented a structured process for obtaining parent input and suggestions on how to improve program services. Developing and implementing such a process could further improve public awareness and support for the program.

The Seminole coalition ensures that required health information is obtained by all school readiness providers regarding each eligible child's health.

The coalition requires families to provide proof of immunization at the time of eligibility determination for the school readiness program and at the time of redetermination for continued services. Current eligibility and enrollment agreements signed by parents include a section on

responsibilities specifying that immunization records must be up-to-date and on file. In addition, the coalition requires that all non-informal child care providers sign a provider agreement confirming their compliance with DCF Licensing Standards, which also includes maintaining current immunization records in each child's file. Providers must notify the coalition's contracted service provider, 4C Orlando, regarding any child whose immunizations are sixty days in arrears as this may subject the child to dis-enrollment. The coalition's policy is reinforced through the 4C Orlando's Family Services Eligibility Manual used during training of the eligibility specialists.

Recommendation:

To further improve community outreach efforts, the OEL recommends that the Seminole coalition examine the possibility of implementing a structured process for obtaining parent input and suggestions on how to improve program services.

Performance Expectation 2: Each early learning coalition and service provider collaborates with educational institutions, such as local community colleges, universities, vocational or business institutions and the school district to train child care program staff.

A well-educated staff will help increase the opportunities for children to learn. Coalitions should collaborate with local community education institutions such as universities, community colleges, and vocational institutions to provide on-going training for provider staff.

The Florida Legislature has established a goal that each prekindergarten class with 10 or fewer students have at least one instructor that holds an associates degree or higher in the field of early childhood education or child development and that each class with 11 or more students have one instructor with an associates degree or higher and the other teacher have at least a Child Development Associate (CDA) certificate. To reach this goal requires working with local educational institutions to increase the training opportunities for current staff. In the absence of such partnerships, providers will struggle to meet the Legislative requirements for instructor credentials.

The coalition has established a process to provide coordinated training opportunities for early childhood teachers and program staff.

The OEL review found that the Seminole coalition identifies and publishes the availability of training opportunities for child care program staff on a quarterly basis. The coalition arranges for some of the training directly and also identifies or facilitates other training opportunities through a coordinated effort with local public schools, early childhood educational associations, private educational training companies, Rollins College, and the Central Florida Community College. All of the coalition's training opportunities are posted on the coalition's website.

Performance Expectation 3: Each early learning coalition collaborates with other community partners to increase efficiencies and to share available resources.

To maximize resources and provide improved programs and services for the children and their families, each coalition should collaborate with other community partners. Partnerships can improve coordination of efforts and diminish duplication of services. In addition, through their partnerships coalitions can determine the services that have been provided, track progress, identify gaps in

services, and estimate future needs. Community partners can include the Department of Children and Families (DCF), Head Start, the Department of Education (DOE), and local One-Stop Centers.

Each coalition can solicit donations from local organizations and businesses that support quality services for children. These donations can be in the form of monetary contributions, in-kind services, and volunteer work from parents and others. By maximizing funding and other community partner resources, the coalition is better equipped to meet the needs of children and their families and improve each child's chance to be prepared for school.

The Seminole coalition collaborates with various community partners to maximize available resources through monetary donations and in-kind services.

The Seminole coalition has partnered with various community agencies to maximize resources in delivering early education services to families. For example, the coalition provides literacy information to parents through distribution of "Put Reading First" publications and through lending resource libraries that are located at the coalition office, the 4C Orlando main office, and in 32 early learning provider classrooms. The coalition and 4C Orlando staff indicated that they solicit donations from local organizations and businesses for in-kind services and monetary contributions. The review team verified this by examining a detailed account of United Way and other contributions provided by 4C Orlando. In addition, the coalition has partnered with the Seminole County School Board for in-kind services; specifically, the school board provides office space for coalition staff through a reduced cost on rent. Finally, the coalition collaborates with the local workforce board and Head Start agency for statistical data gathering and forecasting.

The coalition met the required 6% match for FY 2005-2006. However, according to coalition board meeting minutes, meeting match requirements was difficult and did not occur until March. The coalition is currently pursuing other sources of contributions through the Seminole Board of County Commissioners and solicitations in local newspapers

Performance Expectation 4: Each early learning coalition demonstrates collaboration with community organizations and entities to support unique populations (e.g., migrants and children at-risk of abuse and neglect).

Each coalition provides services to children who have disabilities, who are at-risk of abuse or neglect, or who have language barriers. These children deserve the opportunity to learn in a safe and enriching environment that provides services that address their unique needs. The coalition should partner with community organizations that specialize in providing services that satisfy the unique needs of these children and their families. For example, children with referrals from DCF or the appropriate local agency need high quality childcare to protect them from harm.

The Seminole coalition should improve collaboration with community partners who offer services to children who are at-risk of abuse and neglect (DCF).

The OEL review found that the coalition's collaborative efforts with other agencies that provide services to at-risk children is limited. The coalition's executive director attends monthly meetings held by the Community Alliance Children's Services Committee and the area Abuse Prevention Taskforce. However, the review team found no evidence to indicate that these organizations were involved in the program development or planning of coalition business regarding at-risk children. The review team requested and received detailed documentation from 4C Orlando staff regarding the policy for enrolling at-risk children for school readiness services. This policy included specific

requirements for placement of at-risk children in licensed provider centers and licensed child care homes.

Recommendation:

To enhance collaborative partnerships with agencies serving at-risk children, the OEL recommends that the Seminole coalition explore ways to include at-risk community partners in evaluating and planning future program delivery for their shared customers.

5

Eligibility Determination

Brief and Background

Summary

Overall, the Seminole coalition is effectively managing processes for determining client eligibility and service priorities for the school readiness program. The coalition's contracted service provider has established policies and processes to help ensure accurate eligibility determinations for children participating in the program. However, the coalition should improve its oversight of eligibility determination processes for both school readiness and Voluntary Prekindergarten program (VPK) to reduce the risk of improper payment and to ensure that all VPK instructor qualifications are consistently verified and documented. Specific areas for improvement include:

- The coalition delayed monitoring its contracted service provider (4C Orlando) for eligibility determination to within a few days of the contract period ending, which created less than favorable conditions for identifying and correcting deficiencies with the client files should such be found. The coalition should assume full responsibility for effectively monitoring and rigorously overseeing the entire eligibility determination and enrollment process to verify school readiness client data for accuracy and security purposes.
- While the Seminole coalition accurately determines provider eligibility for VPK, it allowed providers to participate in 2005–2006 without obtaining all of the documentation needed to substantiate the credentials of their instructional staff. Specific deficiencies included missing documentation of moral character and background screenings that were either missing or expired. Background screenings and moral character documentation are important to ensuring the safety and well-being of the children that participate in this program.

Background

The Seminole coalition contracts with the Community Coordinated Care for Children, Inc. of Orlando (4C Orlando) for enrollment and eligibility determination services for both school readiness and VPK. Some of the services include timely and accurate eligibility and redetermination services; facilitate provider application, and eligibility process; manage voucher and Certificates of Eligibility process; manage simplified point of entry and unified waiting list while ensuring parental choice; use EFS for provider payments and reconciliation; determine parent fees for school readiness children; and provider compliance monitoring and development of corrective action plans, if applicable.

Methodology

The OEL developed a series of performance expectations for eligibility determination processes and examined the extent to which the Seminole coalition is meeting these expectations. (See Exhibit 5-1 for a list of the expectations.) The performance expectations include indicators that support compliance with state and federal laws and regulations, as well as best practice indicators that could assist coalitions in maintaining high quality programs and operations.

To determine the extent to which the coalition meeting these expectations, the review team examined client files based on a random sample of 100 children receiving school readiness services during the 2005–06 fiscal year. The review process included reviewing the following documentation for accuracy and completion:

- Eligibility and Enrollment application
- Proof of Age
- Parent Identification
- Date of Application and Determination
- Eligibility Beginning and Ending Date
- Billing Group
- Income and Parent Wages Verification
- Determination of Priority Client
- Enrollment in Education, if applicable
- Proof of Disability of Child, if applicable
- Correct Parent Fee Determination
- Type of Care
- Full-Time or Part-Time Care
- Parent Agreement
- Signed Referral, if applicable

The team conducted staff, parent, and provider interviews and collected documents to substantiate that the coalition is or is not meeting performance expectations in relation to the Voluntary Prekindergarten program. Samples of documents collected include flyers and brochures, copies of provider/instructor and child file reviews, interview notes, focus group notes, and other coalition and contracted service provider documents.

The review team interviewed Seminole coalition board members, coalition employees, service provider staff, parents and early education and care teachers to gain their perspectives on the coalition’s eligibility determination processes. The team also examined the coalition’s monitoring processes and results.

Exhibit 5-1 Performance Expectations for Eligibility Determination

- 1 Each early learning coalition adheres to eligibility priorities consistent with laws, rules, and policies.
 - 2 Each early learning coalition has policies and procedures in place to ensure an effective and efficient eligibility determination process that complies with laws, rules, and policies.
 - 3 Each early learning coalition’s eligibility and redetermination services are accessible for parents and families.
 - 4 Each early learning coalition has policies and procedures in place to ensure that all families receiving school readiness services are assessed an appropriate parent copayment fee.
 - 5 Each early learning coalition ensures that providers meet acceptable standards for VPK and that only qualified staff work in the VPK program.
-

Findings and Recommendations

Performance Expectation 1: Each early learning coalition adheres to eligibility priorities consistent with laws, rules, and polices.

An effective eligibility determination process ensures that children deemed to be most at-risk of future school failure are the primary recipients of opportunities to enhance school readiness. Such programs increase the opportunities for at-risk children to achieve educational successes and become productive members of society. Coalitions are mandated by s. 411.01, F.S., to adhere to established enrollment priorities based on the established at-risk categories.

While these requirements do not prohibit coalitions from serving non-priority children, the coalitions must have a defined, written process to ensure that school readiness services are provided based on the established priorities. Disenrollment of non-priority children is the least desirable method for ensuring that all at-risk children are served, but may be undertaken if necessary. Finally, coalitions should analyze the populations served and the needs of the community to ensure that they are meeting the unique needs of the families and children in these priority groups as allowed by law.

The Seminole coalition is effectively managing its eligibility priorities for efficient utilization of program funding.

The coalition plan has clearly defined eligibility priorities for serving children in its school readiness program. Coalition staff periodically reviews these priorities and service delivery to ensure community needs are met. For example, during the fiscal year 2005-2006, the coalition board Executive Committee reviewed proposed priority recommendations and supporting rationale from Community Based Care (CBC) of Seminole. The CBC is the organization responsible for overseeing referrals for abused and neglected children and coordinating eligibility enrollment and services with the coalition's contracted service provider, 4C of Orlando. As a result of CBC priority recommendations, the Executive Committee conducted an annualized cost impact study for such services based on current numbers of affected children. The committee's review and recommendations resulted in the board approving two amendments to the coalition's eligibility priorities.

The Seminole coalition has implemented several additional activities to promote efficient and effective eligibility determination priority utilization and management. The coalition reviews school readiness outcomes and issues related to child care enrollment and service integration through a family needs assessment and collaborative efforts with agencies such as Workforce of Central Florida and Community Based Care of Seminole. The executive director expressed concerns with eligible families moving to surrounding counties due to the high cost of living in Seminole county and families no longer being able to afford available housing.

To assist in planning, coalition staff conducted a data analysis study of coalition-funded preschool children by zip codes comparing school district free lunch or reduced rate lunch data. The goal was to gain insight into the degree of market penetration into various communities within the county. As a result of this analysis, the coalition authorized its service provider (4C Orlando) to open enrollment for all eligible children up to the age of 13 at the May 25, 2006, board meeting.

Performance Expectation 2: Each early learning coalition has policies and procedures in place to ensure an effective and efficient eligibility determination process that complies with laws, rules, and policies.

As previously stated, the intent of the eligibility determination process is to ensure that children deemed to be most at-risk of future school failure are the primary recipients of opportunities to enhance school readiness. It follows that proper determination and documentation of eligibility is required by federal (45 CFR 98.20) and state law (s. 411.01, F.S.) in order to support the allocation of resources. Having a series of steps or procedures that support established policy ensures that resources are expended on those children most in need of the services. Furthermore, failure to maintain the proper documentation undermines the integrity of the eligibility determination process and may lead to ineffective and inefficient delivery of school readiness services for the priority populations.

In addition, the VPK program was created to prepare every four-year-old in Florida for kindergarten. VPK is available for all children who reside in Florida and are 4 years of age before September 1st of the school year. Coalitions must manage the enrollment process to ensure that only eligible children participate in the program and that families have access to information about the various provider options. Specifically, coalitions need to collect proof of age and residency, conduct a face-to-face enrollment meeting between the parent and coalition or service provider staff, and maintain documentation in the child's file.

The Seminole coalition needs to improve its oversight of eligibility determination processes.

For fiscal year 2005–2006, the Seminole coalition delayed monitoring the contracted service provider (4C Orlando) for eligibility determination to within a few days of the contract period ending, which created less than favorable conditions for identifying and correcting deficiencies with the client files. Although the coalition began discussing and implementing a monitoring plan, tool and schedule in February 2006, the coalition did not conduct actual child eligibility determination and file monitoring review until June 19, 2006. According to the executive director's report to the board at the January 26 meeting, some of the coalition's contract monitoring delays were because of the failed attempts to coordinate contract monitoring efforts with the Early Learning Coalition of Orange County who also contracts with 4C Orlando.

The coalition's contract monitoring for eligibility and determination included a review of the files of 100 school readiness children served during the second half of the fiscal year, which was approximately 5% of the total school readiness children. During the OEL review, the coalition provided a completed client file spreadsheet documenting the client file review. The coalition also showed evidence of a letter addressed to the 4C Orlando with the monitoring information. The undated letter stated that all files reviewed contained the following information: signed application, terms and conditions, proof of residence, proof of age, proof of income, and parent fee. In addition, according to the letter, out of the 100 files reviewed, only one file lacked proof of age documentation.

The Seminole coalition generally has an effective eligibility determination process for the school readiness program.

In general, the Seminole coalition is implementing an effective eligibility determination process for the school readiness program. The OEL review team reached this conclusion based on the following:

- **Strong quality assurance processes have been established.** The coalition’s contracted service provider (4C Orlando) has established policies and processes to help ensure accurate eligibility determinations for children participating in the program. According to documentation examined by the review team, the eligibility counselors for 4C Orlando were trained on an internal client file review process by using a form entitled “Paperwork Self-Audit Checklist.” In addition, 4C Orlando staff indicated that all client files are reviewed by a second employee to ensure information is complete, accurate and determined correctly. Finally, the eligibility supervisor for 4C Orlando randomly pulls and reviews case files each month looking for patterns and gaps in understanding.
- **The OEL client file review found minimal errors.** The OEL team reviewed 53 client files for the Seminole coalition’s school readiness program and found a minimal number of eligibility determination errors. Specifically, the review found that 3 of the 53 files did not have proof of age documentation as required by Rule 60BB-4.200, Florida Administrative Code (F.A.C.). In addition, the team noted that the client files were inconsistently organized, making it more difficult for internal or external post auditing processes to validate that appropriate eligibility determinations were made for individual clients. For example, documentation for proof of a parent’s identification, birth certificates, and social security numbers was very difficult to locate in a majority of the files.

The Seminole coalition makes accurate eligibility determinations for children participating in the VPK program.

The OEL review team conducted a random on-site sampling of child files for children participating in the VPK program to ensure that each family has submitted the proper documentation to prove their children’s eligibility. The team found a very low rate of error (1.6%) in the documentation required for the child files.

Recommendation:

To ensure an effective and efficient eligibility determination process that complies with laws, rules, and policies, the OEL recommends that the Seminole coalition establish clearly defined monitoring procedures to include timely monitoring of client files for eligibility determinations.

Performance Expectation 3: Each early learning coalition’s eligibility and redetermination services are accessible for parents and families.

It is the intent of the Legislature that school readiness services shall be an integrated and seamless system of services. It is also the intent of the Legislature that school readiness programs not exist as isolated programs, but build upon existing services and work in cooperation with other programs for young children, and that school readiness programs be coordinated to achieve full effectiveness.

State law requires that each school readiness program have an established single point of entry (SPE) and a unified waiting list.

The utilization of the Wait List process provides an integrated information system that allows a parent to enroll his or her child in the school program at various locations throughout the county or multi-county region served by an early learning coalition. The intent behind establishing the Wait List is to increase parent access to and involvement in school readiness services, and to eliminate cultural and geographic barriers. Elimination of redundancy in enrollment processing might be realized, thereby streamlining information processing.

The Seminole coalition effectively manages program enrollment and the unified wait list.

The Seminole coalition maintains an up-to-date Unified Wait List (UWL) and has a process in place to ensure that every family in the service area has access to the Single Point of Entry. Parents can complete initial wait list applications for services through the Seminole County One Stop Career Center (Lake Mary office), the Sanford office, on-line through the coalition's web site, phone and facsimile service. Two eligibility specialists and one Child Care Resource and Referral (CCR&R) counselor are bilingual and are available to serve non-English speaking families. Parents can also contact Resource and Referral Services to obtain information and guidance. Parents receive packets containing information and instructions in their spoken language to prepare for the eligibility determination interview. In order to qualify for eligibility services and be placed on the wait list, parents are required to submit a pre-application.

The review team examined the coalition's UWL and found that it was effectively managed by the coalition as indicated by a low number of children on the wait list and no priority workforce or at-risk of abuse children. The coalition has a Unified Data Specialist who is responsible to ensure that the UWL is kept up-to-date with the most accurate information. The coalition purges the wait list every two months and reviews the current activity status by requiring parents to update their information in the system within that time period.

Processes are in place to notify parents thirty days prior to any eligibility status change as part of the provisions in the coalition's contract with 4C Orlando. Parents also receive the Terms and Conditions for Application, customer complaint/grievance procedures and rights to appeal, and the parent agreement as part of the eligibility process. The signed parent agreement confirms that parents understand the information provided and their rights to appeal. The OEL's review of the client files confirmed that all but one of the files reviewed contained a current signed parent agreement form.

Performance Expectation 4: Each early learning coalition has policies and procedures in place to ensure that all families receiving school readiness services are assessed an appropriate parent copayment fee.

It is the intent of the Legislature that school readiness programs be operated on a full-day, year-round basis to the maximum extent possible to enable parents to work and become financially self-sufficient. State law requires that the coalition establish a sliding fee scale for parent copayments, based on ability to pay. The payment rates may not have the effect of limiting parental choice or creating standards or levels of services that have not been authorized by the Legislature.

These parent fees should be reasonable and tracked within the child's file. The coalition's fee scale should reflect local economic conditions, but must not conflict with regulations regarding the services for which the coalition may bill. As part of their payment procedures, the coalition should identify how it proposes to handle fees for eligible families that are affected or displaced by natural disasters. This should include staff (or positions) that are authorized to make final determinations about waiving fees.

The Seminole coalition assesses accurate parent copayments for the school readiness program.

Based on a review of client files for, the OEL review team found that the Seminole coalition is consistently determining the appropriate parent copayments for individual clients participating in the school readiness program.

According to the coalition's approved sliding fee schedule, reduced fee allowances are adhered to for the second and all additional children in the family receiving school readiness services. Fee waivers or reductions were noted in protective service referrals. However, notations about fee reductions or waivers could not be found in some of the other applicable files reviewed having reduced fees.

In addition, the service provider's eligibility supervisor was not aware of the coalition having a fee waiver policy and follows the Community Based Care fee waiver process when referrals are submitted. The review team could not confirm documentation of fee waiver reductions for at-risk of abuse, neglect, and exploitation children if the fee waiver was made through a CBC process by phone.

Performance Expectation 5: Each early learning coalition ensures that providers meet acceptable standards for VPK and that only qualified staff work in the VPK program.

In order for a provider to offer VPK, they must meet specific requirements as outlined in Florida law for both the school year and summer programs. Providers must turn in the proper approved OEL application form (AWI-VPK 10) to the coalition and be approved by the coalition. Providers are also required to sign an agreement with the coalition (AWI-VPK 20). A separate form is filled out by the provider that establishes VPK classes (AWI-VPK 11) and designates primary and secondary teachers assigned to each class. Verification that satisfies the requirements of both forms is kept on file for each provider. Because requirements differ for the school year and summer programs, coalitions must evaluate each type of application appropriately. Coalitions that do not accurately review the applications may approve providers that fail to meet the requirements or inadvertently disapprove providers who do.

In keeping with Florida's high standards, the coalition must ensure that the classroom staff or instructors of each VPK provider have the proper credentials. Florida law requires that each lead VPK instructor hold, at a minimum, a current Florida CDAE or National CDA certification for the school year program and be certified for the summer program. An instructor may also meet this requirement by having an associates degree or higher with specific educational requirements and work experience. To ensure that instructors meet these requirements, coalitions should obtain copies of proper documentation and keep them updated in the provider files. These files are subject to file reviews by the OEL monitoring teams. Failure to secure and maintain proper required documentation on a VPK instructor could result in the instructor being removed from the VPK classroom.

While the Seminole coalition accurately determines provider eligibility for VPK, it allowed providers to participate in 2005-2006 without obtaining all of the documentation needed to substantiate the credentials of their instructional staff.

The review team examined a representative sample of VPK provider files during the on-site visit to determine whether each provider had submitted the required documentation. The review team's examination of 23 VPK provider files found that only one provider file was missing evidence of licensure and a signed contract with the coalition.

However, when examining the credentials of instructional staff, the review team found that a significant number of the instructors were missing key documentation to substantiate their credentials. Specific deficiencies included missing documentation of moral character and background screenings that were either missing or expired. Background screenings and moral character documentation are important to ensuring the safety and well-being of the children that participate in this program. Documenting instructor eligibility to teach in the classroom is necessary to assign the instructor to a VPK classroom.

The review team examined 23 VPK provider files, which also included 97 instructors. Of the 97 instructor files, the team found that 31 were missing a portion of the required level 2 background screenings or the screening had expired. Eleven of the 31 instructors were also missing multiple parts of the level 2 background screening. In addition, 43 of the 97 instructors did not have the good moral character affidavit. Finally, seven lead instructors did not have the necessary CDA(E) or higher education degree, and six lead instructors were missing the emergent literacy certification.

Recommendation:

In order for the coalition to meet indicator and statutory requirements and improve their ability to ensure that only qualified staff work in the VPK program, the OEL recommends that the coalition develop and implement a process to ensure that it obtains all required documentation for VPK instructor credentials.

6

Educational Service Delivery

Brief and Background

Summary

The Seminole coalition is implementing a comprehensive approach for improving educational services in its community, including a requirement for all non-informal school readiness providers to sign an agreement attesting to the use of developmentally appropriate curricula. In addition, the coalition has implemented a full range of developmental screening and assessment services for children in the school readiness program. However, as discussed in Chapter 2, the coalition has not conducted sufficient monitoring of its contractor (4C Orlando) to ensure that the educational services are being delivered as intended. Specifically, the coalition has not validated that its contractor is monitoring individual school readiness providers to ensure they are adhering to their agreements and to ensure that the schools are administering child screenings or assessments properly.

Notable Accomplishments or Activities

- The Seminole coalition has implemented various quality activities to increase parental choice and improve the quality and availability of child care programs. For example, as part of its quality enhancement initiative, the coalition has initiated the “Strokes of Genius” Project. The project was designed to increase the school readiness of children entering targeted elementary schools where kindergarten School Readiness Uniform Screening System (SRUSS) scores are below the county’s average. Twenty child care sites were selected to participate in the project.
- In order to promote comprehensive consumer education, the Seminole coalition provides information on their website to assist parents in making better informed choices for child care to meet their child’s specific developmental needs. The website information includes tips for parents on observation of child care centers and homes. These tips include clues to look for to ensure the center is safe, that there is adequate staff for the number of children, and that the staff have the knowledge and experience to give children quality care.

Background

The Seminole coalition implements educational services primarily through a contact with 4C Orlando. Specific educational services provided by 4C Orlando include:

- Administering or facilitating the administration of developmental screenings and assessments for children in the school readiness program.
- Working in collaboration with the Seminole coalition to support achievement of “Strokes of Genius” project objectives.
- Administering or facilitating the administration, with the consent of parent/guardian, of the Lollipop pre-/post-test on all school readiness-funded children 48 through 60 months.

The coalition formed a committee composed of coalition members and early learning providers to evaluate and recommend developmentally appropriate curricula. The list of approved curricula was adopted in June 2004. This list delineates that while each of the approved curricula was sound, providers needed to supplement the curricula with more targeted emergent literacy materials. The coalition also adopted a process by which early learning providers may submit other curricula for approval, and after a thorough review by the curriculum review team, the submitting provider may use the curriculum or make suggested changes.

In addition, the Seminole coalition has increased educational services through individual provider agreements with all non-informal school readiness providers. These agreements require providers to attest to using an approved coalition curricula and a commitment to providing developmentally appropriate practices that foster cognitive development in children birth to five years.

Methodology

The OEL developed a series of performance expectations for delivery of early learning educational services by coalitions (presented as Exhibit 6-1). The performance expectations include a mixture of indicators relating to compliance with state and federal laws and regulations, as well as indicators for additional activities that could assist early learning coalitions in maintaining high quality programs and operations.

To determine the extent to which the Seminole coalition is meeting performance expectations, the review team interviewed the coalition executive director, coalition staff, and personnel from 4C Orlando. In addition, the team examined the Seminole Coalition’s contract with 4C Orlando, board meeting minutes, mini-grant program guidelines, provider agreements, and inclusion reports.

Exhibit 6-1 Performance Expectations for Educational Service Delivery

- 1 Each early learning coalition has a comprehensive strategy for improving the educational services of early childhood providers in its service area.
 - 2 Each early learning coalition supports providers in using curricula that are effective and developmentally appropriate.
 - 3 Each early learning coalition ensures that providers use pre- and post-assessment data to make sound decisions about teaching and learning.
 - 4 Each early learning coalition has a monitoring process to ensure that providers comply with program requirements and deliver effective VPK programs.
-

Findings and Recommendations

Performance Expectation 1: Each early learning coalition has a comprehensive strategy for improving the educational services of early childhood providers in its service area.

Providing effective educational service delivery requires effective planning. Each early learning coalition should develop and implement a comprehensive educational services plan to meet the requirements of s. 411.01, F.S. This plan could include helping providers deliver a research-based curriculum, conducting health and developmental screenings to ensure that children are ready to learn, and conducting the pre- and post-assessments to monitor progress.

The plan should also address developmental stages, helping ensure that caregivers recognize the developmental stages of young children and adjusting the curriculum and learning plans to each child's needs. Without a thorough educational plan, the coalition may not deliver sufficient support to its providers. Research shows that child care has an important influence on children's lives, and coalitions must ensure that programs focus on the growth taking place in the first years of a child's life.

The Seminole coalition has developed a comprehensive strategy for improving educational services in its community; however, it has not conducted sufficient monitoring to ensure that the services are being delivered as intended.

The Seminole coalition has developed an effective strategy to improve educational service delivery in its service area. Specific coalition activities for improving educational services include:

- Establishing a planning and program committee that determines curricula to be used by providers. The committee meets every other month in alternating months from coalition board meetings.
- Employing a Quality Enhancement Specialist, whose duties include researching and providing recommendations concerning the purchase of quality materials, including curricula to improve quality child care.
- Requiring that all non-informal school readiness providers to complete a provider agreement that includes attestation of using approved coalition classroom curricula and a commitment to providing developmentally appropriate practices that foster brain development in children birth to age five. This provider agreement also includes an attestation for providers to perform screening and assessments of children birth to age five using coalition approved instruments. In addition, the coalition and provider employees attend workshops and caregiver meetings to advance knowledge, skills, and abilities in the delivery of school readiness early education and care.
- Sending a "Welcome" packet to every newly licensed provider in Seminole County from 4C Orlando at the direction of the coalition. The packet explains the school readiness and VPK programs and invites these new providers to contact 4C Orlando for additional information.

However, as discussed in Chapter 2, the Seminole coalition has not sufficiently monitored its contractor (4C Orlando) to ensure that educational services are being delivered as intended by the

coalition and in accordance with contractual obligations. The coalition should monitor its contractor at least once annually. This monitoring would encompass outreach and community awareness, financial records, quality enhancement services, child eligibility, and provider attendance reporting and payments. The coalition conducted a monitoring of eligibility determination on June 19, 2006, but did not provide any evidence that other programmatic monitoring occurred. Insufficient monitoring negatively affects the coalition's ability to fully meet performance expectations for educational services delivery.

Recommendation:

To improve its educational services for early learning programs, the OEL recommends that the Seminole coalition conduct on-site monitoring of its contracted service provider (4C Orlando) to ensure that educational services are being delivered as intended by the coalition and in accordance with contractual obligations.

Performance Expectation 2: Each early learning coalition supports providers in using curricula that are effective and developmentally appropriate.

To meet state educational expectations, each school readiness provider should follow a developmentally appropriate curriculum. Programs that use a developmentally appropriate curriculum provide for a wider range of developmental interests and abilities. For children to receive maximum benefits, the program should focus on the individual developmental needs of each child. Since each child is a unique person with an individual personality, learning style, and family background, caregivers need to be responsive to these individual differences while maintaining a focus on meeting the expected outcomes. Coalitions should support providers in both identifying appropriate curricula and their implementation.

While all non-informal school readiness providers must agree to use developmentally appropriate curricula, the Seminole coalition has not monitored 4C Orlando to validate that providers are adhering to their agreements.

The Seminole coalition has a process whereby all licensed providers and registered family child care home providers (non-informal) complete a provider agreement that includes attesting to the use of an approved coalition classroom curriculum and a commitment to providing developmentally appropriate practices that foster brain development in children birth to age five. Coalition staff indicated that 4C Orlando (pursuant to its contract with the coalition) monitors 100% of new school readiness providers and 50% of current school readiness providers annually using either a program evaluation tool (for new) or Environmental Rating Scale (for experienced). These tools look at curriculum and its application. The executive director also indicated that the coalition obtains and reviews data on the results of the monitoring.

However, the coalition has not sufficiently monitored 4C Orlando to validate the monitoring reports submitted to the coalition. Without doing so, the coalition cannot be assured that 4C Orlando is actually monitoring individual school readiness providers for adherence to their agreements.

Recommendation:

The OEL recommends that the Seminole coalition develop and implement a process for monitoring individual providers to ensure that they are meeting their provider agreements regarding the use of developmentally appropriate curricula.

Performance Expectation 3: Each early learning coalition ensures that providers use pre- and post-assessment data to make sound decisions about teaching and learning.

By tracking the performance of the children and using the results to determine classroom practices, providers can enhance the learning opportunities for the children in their program. Coalitions should monitor providers to ensure that they conduct pre- and post-assessments to track progress, identify developmental delays, and analyze strengths and weaknesses. These results should then be used to develop strategies for intervention and improvement.

The Seminole coalition has implemented a full range of developmental screening and assessment services but should improve its monitoring of 4C Orlando to validate that screenings are being administered properly.

The Seminole coalition’s contract with its contractor (4C Orlando) specifies that 4C Orlando is responsible for child performance improvement services, including developmental screenings and assessments. The specific screening and assessment processes for school readiness are described below.

- **The Ages and Stages Questionnaire** — The contractor administers or facilitates the administration, with the consent of the parent or guardian, of the “Ages and Stages Questionnaire” (ASQ) developmental screening on all children ages 48 through 60 months to determine service needs. These screening services include pre-screening and three levels of screening. For Level I screenings, providers (pursuant to their provider agreements) ask parents to complete the ASQ and submit the questionnaire to the provider within forty-five days as part of the initial enrollment into the school readiness childcare program. If the parent does not do so, the provider completes the ASQ. The child care provider is also required to conduct the ASQ within thirty days of the child’s birthday and every year thereafter. If a child is identified as having possible learning delays after the initial screening, the 4C Orlando administers another ASQ within two weeks to determine validation for the birth to three-year-old children. Children who do not meet the validation screening for their age receive a hearing and vision screening as well as an individualized learning plan (ILP). The contractor’s Inclusion Specialist assists providers with intervention and technical assistance to enhance the child’s learning environment. A Level III screening is conducted by the contractor’s Early Intervention Specialist after the initial intervention period. If a child continues to show developmental delays, the Early Intervention Specialist refers the family for additional early intervention services within the community.
- **The Lollipop assessment instrument** — The Seminole coalition selected and approved the Lollipop assessment instrument for four- and five-year-old children receiving school readiness services to determine if a child is developing appropriately or requires further intervention. This assessment instrument was to be administered on the four- and five-year-old children beginning

in July 2005. All early learning providers received training and technical assistance on this assessment instrument as part of the contract deliverables. A pre-test is administered by the child care provider at entry into their program and the results are sent to the coalition’s service provider for analysis. The provider will receive technical assistance packets containing activities designed to strengthen areas of need common across the class based on this analysis. Specialized materials are also recommended for children falling outside developmental norm. Once the post-test is completed, another analysis is conducted and shared with the provider for school readiness program planning and enhancement purposes.

Based on interviews with staff from 4C Orlando and a review of reports for non-direct services, the review team determined that the assessments were administered as provided for in the coalition’s contract. Exhibit 6-2 displays the screenings, assessments, Individual Learning Plans (ILP) and referrals conducted by the coalition’s service provider on school readiness children during the fiscal year 2005–06. In most instances, 4C Orlando was able to screen or assess significantly more children than was planned or budgeted for by the coalition.

**Exhibit 6-2:
The Seminole Coalition’s contactor administered a full range of developmental screening and assessment services during fiscal year 2005–06 and referrals (DC)**

| Early Intervention | Number of Children Budgeted for Screenings or Assessments | Actual Number of Children screened and assessed | Percentage of Goal |
|--|---|---|--------------------|
| Level I Ages and Stages (ASQ) Questionnaire | 1,860 | 2,838 | 152.5% |
| Level II Screenings | 216 | 364 | 168.5% |
| Level II & Level III Individual Learning Plans | 48 | 43 | 89.5% |
| Level II & Level III Re-screenings | 36 | 37 | 102.7% |
| Level III Referrals | 48 | 39 | 81.2% |
| ASQ Technical Assistance to Providers | 48 | 117 | 243.7% |
| Lollipop Assessment Tool Technical Assistance | 83 | 83 | 100.0% |
| Lollipop Assessment Training | 22 | 61 | 277.3% |
| Hearing & Vision Screenings | 216 | 622 | 288.0% |
| Consultations to Parents and Providers | 456 | 622 | 136.4% |

Source: Early Learning Coalition of Seminole

However, the coalition has not sufficiently monitored 4C Orlando to validate the screening and assessment reports submitted to the coalition by the agency. Without doing so, the coalition cannot be assured that 4C Orlando or individual providers are administering the screenings properly.

Finally, the Seminole Coalition’s Program and Planning Committee is in the final process of developing a screening checklist for the birth to three-year-old children that is based on the *School Readiness Birth to Three Year Old Standards*. The committee is very cognizant of the high turn-over rate of the birth to three-year-old early childhood teachers and designed a checklist that would meet the

screening specifications of this age group, as well as being an easy instrument to use for training and administrative purposes.

The Seminole coalition conducts follow-up services for children who are referred for additional early intervention services.

As stated earlier, the Early Intervention Specialist refers the family for additional early intervention services within the community if a child continues to show developmental delays after a Level III screening. The inclusion services staff of 4C Orlando provided samples of referrals given by eligibility counselors. 4C Orlando also provided a community resource guide that contains referral information for audiologist, dental, speech and language, behavior, developmental concerns, and vision services. The purpose of the guide is to refer families to area agencies providing specific services that have been identified as a need through child screenings and assessments. Quarterly inclusion reports are submitted by 4C Orlando to the coalition with data on referrals to community partners serving children with special needs. An inclusion resource book was written by the coalition and is used in training of child care program staff, which includes information on diagnosis of special needs, when to refer children for additional services, and special equipment and adaptations for the classroom.

In addition, the review team found that the coalition's inclusion specialist conducts follow-up services with parents receiving referrals to help ensure that they are accessing needed services. Coalition staff, however, identified some challenges that limit the effectiveness of the actual referral services process. Some of the parents are no longer at the phone number given at the time of the referral, thus the coalition is unable to determine whether the families have obtained services as part of the follow-up. Coalition staff indicated that the largest problem with referrals is not that parents don't participate, but rather that services are not affordable or accessible for them.

Notable Accomplishments or Activities

The Seminole coalition's program and planning committee, which includes the coalition executive director, board members, and early learning providers, conducted a study to determine populations of providers serving children falling below the Seminole county School Readiness Uniform Screening System (SRUSS) scores. As a result of this study, 20 providers were selected to participate in the coalition's "Strokes of Genius" three-year impact pilot project. These providers will receive training and technical support from several community partners to enhance their school readiness educational programs. The "Strokes of Genius" project is a performance enhancement project targeting 2,000 children in need of additional intervention strategies. A total of 65 children were screened with all but 24 being identified as having a need for further evaluation. Through the "Strokes of Genius" grant vision, hearing, and health screenings were provided at the 20 designated early learning sites. The screenings were conducted at the targeted child care centers since many of the families and children served lack transportation to the health department or to the public schools. Basic medical exams were also conducted by a nurse who verified immunization records in each child's file. The nurse contacted the parents for permission to administer shots to a child needing current immunizations. In addition to the support of the inclusion specialist, the coalition hired a part-time early education professional to work closely with the providers and children identified as participants in the "Strokes of Genius" project in order to help them attain their developmental goals.

Recommendation:

To further improve developmental screening and assessment services, the OEL recommends that the Seminole coalition develop and implement a formal process for evaluating whether developmental screenings and assessments are being properly administered by individual school readiness providers.

Performance Expectation 4: Each early learning coalition has a monitoring process to ensure that VPK providers comply with program requirements and deliver effective VPK programs.

The VPK program is free but can be offered along with other school readiness child care services. As a result, parents will often pay for part of their child's care while receiving part free under the VPK program. Coalitions must ensure that parents are not charged for any of the time and services covered by VPK. Any provider who charges fees or requires enrollment in additional services can be dismissed as a provider for the program. If a provider fails to secure monthly signatures verifying their child's attendance, or fails to review the signed attendance forms against the certified student attendance, the provider can be cited for violating the OEL policy.

The Seminole coalition has not implemented a monitoring process to ensure that the VPK program is being delivered as intended.

In order to ensure that individual providers are complying with VPK program requirements and are delivering effective programs, consistent and timely monitoring of providers is essential. The Seminole coalition has developed a monitoring process, but it has not been fully implemented. Although there is evidence that monitoring of providers was conducted by the contracted service provider (4C Orlando), monitoring of 4C Orlando by the coalition did not occur.

Recommendation:

The OEL recommends that the Seminole coalition implement its monitoring schedule to validate that individual VPK providers are providing effective programs that comply with statutory requirements.
