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REVIEW OF THE EARLY LEARNING COALITION OF PUTNAM AND ST. JOHNS COUNTIES APRIL 2007—REPORT 07-05

Results in Brief

In accordance with Florida law, the Agency for Workforce Innovation's (AWI) Office of Early Learning (OEL) conducted a performance and accountability review of the Early Learning Coalition of Putnam and St. Johns Counties, Inc. (the coalition, or Putnam and St. Johns coalition) between December 2006 and February 2007. The period under review was from July 2005 through December 2006.

The Putnam and St. Johns coalition's overall effectiveness in implementing early learning programs is mixed and uneven. In some aspects of program implementation, the coalition is operating its programs in a manner that complies with state and federal rules and regulations. Notably, the coalition is implementing a quality Child Care Resource and Referral program. The review also found the coalition has initiated efforts to improve implementation of its early learning programs based on a special review dated December 2005 and the recommendations of the OEL.

However, some issues that diminish the coalition's overall effectiveness remain, particularly in the area of executive leadership and oversight. These issues include the following:

- Inconsistent attendance by board members has limited the ability of the board to form quorums for decision making.
- Committee membership and participation is unbalanced between the two counties (Putnam and St. Johns), creating the potential for representation of one county's concerns over another's.
- Oversight and management of financial operations is inadequate, leading to recurring issues with contractors and early learning providers.
- The coalition's process for managing contracts is inadequate due to unclear roles and responsibilities and incomplete monitoring activities.
- Eligibility determination processes for the School Readiness program are inadequately documented and in some cases are misapplied, resulting in a consistent pattern of errors in the files examined during the OEL review.
- Current coalition policies for verifying VPK instructor credentials lack adequate safeguards to prevent children from receiving instruction from unqualified individuals.

Scope and Methodology

Florida law requires the Agency for Workforce Innovation to monitor and evaluate the performance of each early learning coalition's administration of the School Readiness and Voluntary Prekindergarten (VPK) education programs. To accomplish this, the Office of Early Learning developed performance expectations or criteria to provide a framework for measuring a coalition's effectiveness in implementing early learning programs (See *Appendix A—Indicators/Expectations/Standard Levels of Service*).

These 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. Specific areas of program implementation covered by the expectations include: governance and operational processes; grants and contract administration; eligibility determination and verification of provider qualifications; and educational service delivery (s. 411.01(4)(1), F.S.).

In addition, the Office of Early Learning developed a series of indicators and standards known as the *Child Care Resource & Referral Network CCR&R Standard Levels of Service* (Standard Levels of Service), which local coalitions should meet in delivering child care resource and referral services to families. These standards address issues, such as customer service expectations, staff training and certification, consumer services and information, and database maintenance. See *Appendix A—Indicators/Expectations/Standard Levels of Service* for a more detailed description of the Standard Levels of Service.

To measure the extent to which the Putnam and St. Johns coalition is meeting the performance expectations and the Standard Levels of Service, the OEL review team interviewed the coalition executive director, coalition staff, board members, parents, providers, and personnel from the coalition's contracted service provider. The team examined the various documents, such as the coalition's contracts, 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 and analyzed various data contained in the Enhance Field System (EFS).

Background

Incorporation. The Putnam School Readiness Coalition and the St. Johns School Readiness Coalition officially merged on July 1, 2005, to form the Early Learning Coalition of Putnam and St. Johns Counties, Inc. Currently, the coalition's 22-member board of directors serves as the policy-making entity

that delegates authority to the coalition's executive director. The board has established two standing committees to help it conduct board business, the Program Committee and the Executive/Admin Committee. The Program Committee's primary responsibility is to assist the coalition in planning and delivery of early learning child care and education, according to the goals of the coalition. The Executive/Admin Committee is charged with overseeing financial matters for the coalition, including financial controls, budget, expenditures, monitoring, and accountability.

At the time of the review, the board consisted of twenty members. Six board members exclusively represented Putnam County; twelve board members exclusively represented St. Johns County, with two additional board members that, by virtue of their position, represented both counties. Membership composition includes representatives from both the private and public sectors. *Appendix B—Early Learning Coalition of Putnam and St. Johns Board Membership* depicts board membership as submitted with the coalition's revised plan on November 25, 2006.

Children served. For fiscal year 2005–06, the Putnam and St. Johns coalition served a total of 1,134 children in VPK and 3,212 children in the School Readiness program.

Organization and staffing. The coalition has an administrative staff of six employees. These include the executive director, fiscal director, program outreach coordinator, quality assurance/contract coordinator, bookkeeper, and administrative assistants. The coalition also provides six staff to support two additional grants. These include the Partners in Education and Research for Kindergarten Success (PERKS) grant awarded by The Children's Forum, and the Home Instruction for Parents of Preschool Youngsters (HIPPPY) grant awarded by the University of South Florida. See *Appendix C—Coalition Organizational Structure* for a diagram of the coalition's organization.

The coalition currently sub-contracts CCR&R services, School Readiness services, and part of Voluntary Prekindergarten services to its primary early learning service provider, Episcopal Children's Services, Inc. (ECS). The contract period is July 2006–June 2007. Before the merger of the coalitions, ECS was the provider of services for the St. Johns County coalition, while Child Care Resources, Inc. (CCR) was the provider of services for the Putnam County coalition. When the merger became effective, both contractors continued to provide services for the coalition in their respective counties until CCR discontinued operations and was no longer able to continue their contract with the new coalition. The coalition published an Invitation to

Negotiate (ITN) and received a response from the Child Development Services, Inc. (CDS) and ECS. During the interim period of May 1, 2006, through June 30, 2006, CDS acted as the primary service provider for Putnam County. Prior to an award, the CDS withdrew its bid, and the contract was awarded to ECS to provide services in both counties. See *Appendix D—Master List of Contracts* for a list of these contracts.

Prior OEL review of coalition operations. The OEL conducted two special reviews of the Putnam and St. Johns coalition between December 2005, and September 2006. The earlier review, conducted December 5–9, 2005, and published on April 24, 2006, focused on coalition governance and operations.

The second review, conducted August 22–26, 2006, and published on October 31, 2006, provided technical assistance and review in the areas of: the conduct of board business; budget, cost allocation, and spending plan; contract management; and staffing issues.

A summary of the recommendations made to the coalition in the two reviews follows:

- **Bylaws and processes.** Revise the coalition bylaws to provide sufficient guidance for the efficient operation of the board. Clearly define the committees' scope and authority. Clearly delineate the roles and responsibilities of the board, executive director, and committee members.
- **Records.** Improve meeting minutes for clarity and validity. Implement a consistent format (level and type of information presented) for major agenda items. Ensure board minutes reflect whether a quorum is present.
- **Training and process improvement.** Participate in board member training and orientation. Simplify board reports, and train board members to use the reports. Simplify expenditure and resource tracking and reporting from the contractor.
- **Fiscal management.** Ensure costs are appropriately charged to administrative and non-direct service Other Cost Accumulators (OCAs). Acquire appropriate fiscal monitoring tools and/or guidance. Reflect the current organizational structure in the cost allocation plan. Update the current accounting system. Provide sufficient financial staffing to ensure all fiscal management needs are met.
- **Self-monitoring.** Assess the board's performance on an annual basis. Develop high-level performance measures

for the coalition plan. Establish a formal process for evaluating the executive director.

Findings

Governance and Operations

The special review described in the *Background* section recommended a sweeping revision of the basic bylaws covering board composition and actions, committee creation and composition, the conduct and recording of board business, and the creation and adoption of self-monitoring practices for board operations. While the review team found that the bylaws and processes created in response to the special review findings were sound, issues with the implementation and practice of these processes remain.

The Putnam and St. Johns coalition's efforts to address prior OEL review findings are commendable but incomplete due to slow implementation

The findings and recommendations of the OEL special review for coalition governance and operations (dated December 2005) advised the coalition's board of directors to:

- revise the coalition's bylaws, including the areas requiring equal representation of the two counties by board members and board meeting attendance;
- create job descriptions with performance expectations;
- create an assessment tool and process for evaluating the executive director and board of directors.

The board has completed these corrective actions; however, implementation appears slow. For example:

- Uneven membership creates the potential for inequality in representation for both counties.
- Continuing problems with low attendance at program committee meetings create difficulties in forming a quorum for decision making.
- The board completed an evaluation of the executive director, but not all members of the board participated in the evaluation.
- The board created an assessment tool for board members, although no assessment has taken place.

The coalition has clearly articulated policies for information management and security

The coalition's *Operational Policies and Procedures Manual* includes clear statements that require all personnel to adhere to state statutes and policies related to information security and management. The *Personnel Policies* also include guidelines and policies that are clear and address telecommunications; confidentiality and information system access; copyrights and license agreements; return of property; and record keeping. ECS also has policies on information management and security that are in line with the OEL policies.

The Putnam and St. Johns coalition does not consistently provide orientation for new board members and updated training for experienced board members

The coalition conducted three board member orientations between October 2006 and November 2006. However, at the time of this review, four of the current board members had not attended a board member orientation. In addition, the coalition could not provide evidence that any board member orientation or board member training took place between June 2005 and June 2006.

The coalition's board orientation is important to ensure members have an understanding of their roles and responsibilities. The coalition has created a *Reference Guide* that is included in the board orientations. The guide is an overview of the coalition programs, including a PowerPoint presentation on VPK, community initiatives, Sunshine Law, and a summation of statutes, bylaws, and governance.

Although the coalition established policies to help prevent board member conflict of interest, it has not been consistent in implementation of these policies

The coalition established a policy that each board member must sign a document (*Code of Ethics for Public Officers and Employees*) confirming his or her understanding of the nature of conflict of interest. However, the policy is not being adequately enforced because many of the board members have not signed the form. At the time of the review, only nine of 22 board members had signed and notarized the *Code of Ethics for Public Officers and Employees* form.

The Program Committee's ability to function effectively is jeopardized by unequal county representation and difficulties in obtaining a quorum

The two standing committees, the Executive/Admin Committee and the Program Committee, were formed to support the coalition in financial and programmatic operations (see the *Background* section for more detail). While

the Executive/Admin Committee appears to be functioning in accordance with the coalition's bylaws, the Program Committee is encountering some issues that could diminish its ability to function. These issues are discussed below.

- **Contrary to its bylaws, the board's Program Committee lacks equal representation from both counties.** The board does not follow its revised bylaws adopted on July 25, 2005, which state, "The coalition will establish standing committees which will have equal representation from both counties." The Program Committee membership includes 14 total members, eight of which are voting members and six are nonvoting members. One voting member represents both counties. Of the 14 members making up the Program Committee, only two represent Putnam County exclusively, and they are nonvoting members.
- **The Program Committee is struggling to meet its goals due to difficulties in obtaining a quorum.** The coalition's board of directors has set goals for the Program Committee, but these goals are difficult to achieve without full participation from committee members. The review team's examination of committee meeting minutes and interviews with board members revealed that low attendance frequently prevents establishment of a quorum for decision making or results in the cancellation of the committee meeting.

The coalition has not completed recommended changes to board meeting packets and committee minutes; however, some improvement has occurred

Based on examination of the board meeting packets for the period from April 19, 2006, to August 16, 2006, and interviews with board members, the OEL review team found that packet size, organization, and contents continue to be problematic. For example, some packets contained charts and reports from multiple committee meetings that overlapped or duplicated information, and some board members expressed difficulty in navigating through the packets or found them unnecessarily large and unorganized. For example, the December 13, 2006 packet, which totaled 229 pages, contained an independent audit report conducted by S. Davis and Associates. This report was previously included in the November 15th packet. In addition, the review team did not receive meeting packets for July 2005–June 2006, so an assessment of the board meeting packets, meeting agendas and committee meeting minutes could not be made for the program year in review.

While problematic, the coalition has made improvements in this area since the previous OEL reviews. Minutes for the period of April 2006 through August 2006 exhibit a distinct change in structure of the agenda and board packets over

time, showing that the coalition has taken guidance from the recommendations given during the special review of December 2005.

Coalition oversight and management of financial operations is inadequate, leading to recurring issues with contractors and early learning providers

The Putnam and St. Johns coalition has a total operating budget of approximately \$12.6 million for fiscal year 2006–07. The coalition employs a fiscal director to help manage the budget. The fiscal director was not able to work full time during the period of this review. Sound and effective management of these funds is imperative for the coalition to accomplish its programmatic goals for the School Readiness and VPK programs. The OEL review identified several issues that indicate a need for stronger fiscal oversight and management.

- **The Executive/Admin Committee and board do not always receive consistent and complete financial information, which hampers their ability to perform effective oversight.** Based on a review of Executive/Admin Committee meeting packets, financial reports, and interviews with board members, the review team found inconsistencies with the presentation of financial matters to the committee. While status reports of budget line-items were routinely provided to the committee by the executive director, some of the information provided at board meetings was incorrect or not current.

For example, at the July 26, 2006, Executive/Admin Committee meeting, staff apologized for not having the utilization report up to date. At the September 13, 2006, meeting, it was discovered that once the financial reports were “cleaned-up,” the School Readiness budget was not overspent, as was previously reported to the committee. At the November 15, 2006, Executive/Admin Committee meeting, the committee expressed concerns that the financial reports needed further simplification and clarification/definition of particular spending codes.

- **While the coalition maintained administrative spending for the School Readiness program within required limits, it exceeded administrative spending limits for the VPK program.** Based on information obtained from the lead coalition analyst, the review team found the 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 2005–06 for School Readiness were 3.48 percent.

However, the coalition exceeded administrative spending limits for VPK by a large margin. Specifically, the General Appropriations Act establishes a 5 percent administrative spending limit for VPK. The coalition’s administrative expenditures for fiscal year 2005–06 were 7.45 percent, which leaves an outstanding issue of over-expenditure for the VPK administration by \$48,375.48.

- **The coalition’s process for paying its contractor and early learning providers is not always timely and accurate.** As stated earlier, the fiscal director did not always work full time during the period of this review. This delayed payments to both contractors and providers and created a delay in reporting accurate financial data to the board.

Based on interviews with the contractor (ECS) and coalition staff, the OEL review team found that communication between the contractor and the coalition has been strained and difficult. The contractor reported that payment issues have marred a good working relationship with the coalition’s financial department. Less than prompt turnaround for contractor invoices has created issues with timely payment to the providers. As a result, the contractor has chosen to support provider payments with borrowed funds as a result of recurring problems with the coalition’s financial department.

In addition, during the onsite focus groups conducted by the OEL review team, early learning providers reported mistakes with the payments they received from the coalition’s contractor.

The coalition is aware of these payment issues and has taken measures to correct them and the relationship with its contractor. Specifically,

- The contractor (ECS) and the coalition will meet monthly to correct providers’ issues with payment.
- The coalition is in the process of hiring a bookkeeper and a quality assurance/contract coordinator with the intention of alleviating the workload for the fiscal director, which should improve the timeliness of payments to the contractor.

Grant Award and Contract Management

Although the Putnam and St. Johns coalition has generally established effective policies and procedures for procuring goods and services, it has not implemented an effective process for managing contracts and for monitoring its

contracted service provider. Since major portions of programmatic operations are conducted through contractual arrangements, it is essential that the coalition strengthen its contract management structure and implement an effective onsite monitoring process to ensure program services are delivered in a manner consistent with contracted purposes and requirements.

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

The coalition has 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. However, as discussed below, some issues with contract management staffing and monitoring could undermine the coalition's procurement process if not addressed in a timely manner.

The coalition's process for managing contracted services is not adequate due to unclear roles and responsibilities and incomplete monitoring activities

The Putnam and St. Johns coalition currently contracts its programmatic functions to Episcopal Children's Services, Inc. (ECS). These contracted functions include enrollment and eligibility determination services, child care resource and referral, local grant and match management, and quality initiatives. In fiscal year 2005–2006, the coalition also contracted with Child Care Resources, Inc. Management of critical contracts is the primary responsibility of the contract manager, who must oversee the bid process, ensure compliance with the terms and conditions, conduct monitoring activities of the service provider, and handle all correspondence between the coalition and the service provider. As such, it is essential that management and monitoring of these contracts is delegated to an individual having the necessary expertise, availability, and background to perform this task proficiently. This position must also maintain sufficient autonomy to avoid any appearance of impropriety.

Based on interviews with coalition staff and a review of monitoring reports and other documents, the OEL review team found that the coalition's contract management and monitoring process fails to ensure contracted services are being delivered as intended.

- **The coalition's organizational structure for managing contracts is not functioning effectively.** Although the coalition's fiscal director is formally designated as the contract manager, the executive director indicated that she is currently functioning in the position because of the current fiscal director/contract manager's part-time schedule. This arrangement is not optimal and has been problematic, with the additional workload apparently overburdening the executive director. Overburdening has caused decreased fiscal monitoring of contracts, as well as delays in provider payments. Furthermore, combining operational responsibilities with contract management duties creates a potential for corporate governance challenges, including the potential for conflict of interest.

In addition, it appears that communication between the executive director and the fiscal director regarding critical contract management responsibilities is insufficient. Specifically, the executive director provided the OEL review team with a copy of the coalition's contract monitoring tool and schedule for fiscal year 2006–07. The fiscal director, who indicated she would be performing fiscal monitoring of the coalition's contractor during 2006–07, was not familiar with the monitoring schedule and tool supplied by the executive director. This kind of miscommunication about critical issues and functions indicates that the coalition's contract management structure is not functioning effectively.

- **The coalition's process for monitoring contracted services is not sufficient to ensure critical program services are being provided as intended.** The OEL review team's examination of coalition monitoring activities for fiscal year 2005–06 found deficiencies in the process. Although the coalition provided copies of reports summarizing results of onsite monitoring activities for 2005–06, the reports were lacking in detail and the coalition was unable to document the monitoring tool and criteria used in the process. In addition, the coalition indicated that its monitoring activities for this period were incomplete. Specifically, the coalition's monitoring report indicated an onsite review of its contractor for programmatic issues such as the delivery of assessment and screening services, and enrollment and eligibility services. However, the coalition did not perform onsite monitoring of fiscal and administrative issues such as checking provider payments to ensure they are made according to the contract, and ensuring the contractor has an approved cost allocation plan.

The coalition revised its contract monitoring process for fiscal year 2006–07 and provided the OEL review team with a copy of the monitoring tool and schedule.

Child Care Resource & Referral

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 and/or needing financial assistance with child care should receive complete CCR&R services. All parents should be offered the option of receiving assistance with finding child care and information that will help them make an informed decision, as well as additional information and community resources as appropriate.

Overall, the Putnam and St. Johns coalition is implementing an effective CCR&R program. The coalition’s contractor, Episcopal Children’s Services (ECS), has met or exceeded most of the Standard Levels of Service for CCR&R and is recognized as a Quality Assured Program through the National Association of Child Care Resource and Referral Agencies (NACCRRRA). However, some issues remain.

The coalition has implemented the Child Care Executive Partnership in St. Johns County, but has not implemented this program in Putnam County

The Child Care Executive Partnership (CCEP) has been established to promote awareness amongst the private employers in the county and to increase funding through partnerships with local business. Although the coalition has implemented the program effectively in St. Johns County, it faces challenges in establishing the program for the rural population in Putnam County. At the time of the review, the coalition had not established a plan for implementing CCEP in Putnam County.

Eligibility Determination Process

The Putnam and St. Johns coalition currently contracts with Episcopal Children’s Services (ECS) for enrollment and eligibility determination services for both school readiness and VPK. The services include timely and accurate eligibility and re-determination services; management of provider application, agreement and qualification process; management of voucher and Certificate of Eligibility process; management of the simplified point of entry and unified wait list systems for families; utilization of EFS for the processing and reconciliation of provider payments; determination of parent fees for School Readiness children; and provider compliance monitoring and development of corrective action plans when applicable.

The coalition’s oversight of eligibility determination processes needs significant improvement

For fiscal year 2005–06, the coalition delayed monitoring the contracted service provider for eligibility determination until within two months of the end of the contract period, which created less than favorable conditions for identifying and correcting deficiencies within the client files. Although the coalition began discussing and implementing a monitoring plan, tool, and schedule in 2005, the coalition did not conduct actual child eligibility determination and a file monitoring review until April 21, 2006 for Putnam County, and May 2–4, 2006, for St. Johns County.

In addition, the reported results of the coalition’s contract monitoring for eligibility determination are questionable. Specifically, the coalition reported that it examined 105 case files and found 100 percent accuracy. However, as discussed in the next section, the OEL’s monitoring of client files for School Readiness found a significant number of errors, which is not consistent with the coalition’s report of 100 percent accuracy.

The OEL review found errors in eligibility determinations for participants in the coalition’s School Readiness program

After reviewing 46 child or client files for the coalition’s school readiness program, the OEL review team found consistent patterns of deficiencies or inadequate documentation in several areas. The 46 files reviewed represented parents and children who received care through different sources of funding and eligibility requirements.

Specific deficiencies found include:

- **Missing proof of immunization**—Four of the 46 files did not contain proof of immunization documentation as required by Rule 60BB-4.200, Florida Administrative Code (F.A.C.).
- **Lack of/inadequate income verification**—Twelve of the 46 applicable files contained incorrect income calculations or insufficient verification of employment or income information.
- **Missing verification of purpose for care**—One of the 46 cases did not verify educational attendance, although this was the purpose for care.
- **Missing proof of age documentation**—Two of the 46 files reviewed did not have proof of age documentation as required by Rule 60BB-4.200, F.A.C.

- **Missing copies of notice of re-determination-** Twelve of the 46 files examined did not contain notices of determination or re-determination.
- **Delayed or untimely determination-** Six of the 46 files contained determinations that were processed after the ten-day time frame for workforce and/or protective services referrals.

Internal quality assurance processes have not prevented errors in eligibility determinations

Interviews with ECS staff, examination of case review sheets, and review of staff meeting agendas reveal an organizational priority for internal quality assurance applied to eligibility determination. For example, new employees at ECS are mentored by experienced workers and supervisors as part of their development. Cases completed by new employees are regularly reviewed for accuracy during their development. While these internal quality assurance processes are well thought out, they have not prevented errors in eligibility determinations. As a result, the coalition should take additional steps to ensure its contractor is performing eligibility determinations in a manner that complies with laws, rules, and policies.

The coalition’s process for re-determining eligibility for School Readiness participants is inadequate

To examine the accuracy of eligibility re-determination, the review staff ran Impromptu reports for *eligibility end dates* for both Putnam and St. Johns counties. For the period of July 2005 to December 2006, the report found 201 cases open beyond the eligibility end date in both counties. Delay in re-determination can create false assessments of a parent’s ability to pay for services or prevent children on a waiting list from receiving services for which they are eligible. As detailed below, the errors found were comprised of incorrect closure of the cases in the Enhanced Field System (EFS) and incorrect authorization of funding beyond the eligibility end date.

Issue	St. Johns	Putnam
Eligibility open beyond end date	162 total	39 total
Of these total errors:		
Closed incorrectly in EFS database	84 (52%)	13 (33%)
Funding authorized beyond end date	78 (48%)	26 (67%)

Delaying implementation of the revised poverty level scale may have denied School Readiness services to eligible parents

The coalition delayed submission of its amended plan to August 18, 2006, resulting in a delay of the approved implementation of the new poverty level scale to September 15, 2006. As directed by OEL policy OEL–PI–0008–05, each coalition must submit written plan amendments no later than May 15, so that the new scales may take effect on July 1. By delaying the implementation of the new federal poverty level, parents applying for services between July 1 and September 15 of 2006 may have been denied services.

Of the 46 case files reviewed during the onsite visit, one case file was found to have the parent’s eligibility determined based upon the incorrect scale. This incorrect determination of fees caused an under payment by the parent. It is the responsibility of the coalition to ensure each parent is assigned a co-payment in accordance with their documented family size and income.

Although missing some documentation, eligibility determinations for children participating in the VPK program were largely correct

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

The coalition allowed providers to participate in the VPK program during fiscal year 2005–06 without obtaining all of the documentation needed to substantiate the qualifications of their instructional staff

The review team examined 32 VPK provider files, which included 132 instructors. Of the 132 instructors, the team found that 11 were missing a portion or multiple parts of the required Level 2 background screening. There were 6 instructors who were missing Emergent Literacy course completion certification and one instructor whose CDA(E) had expired.

The coalition’s current policy for verifying VPK instructor credentials lacks adequate safeguards to prevent children from receiving instruction from unqualified individuals

According to the Executive Administrative committee meeting minutes from July 26, 2006, the board approved a policy allowing the coalition to conditionally approve a provider to offer VPK services until results are received for

an instructor seeking a Level 2 screening. This conditional approval extends up to 120 days. As such, children may receive up to four months of services from instructors who ultimately do not meet the required background screening.

The coalition has not established a method for tracking and processing teacher and classroom changes in the VPK program

Understandably, some of the instructors providing services in VPK classrooms may change during the course of a full program year. As such, it is important for the coalition to establish a process for providers to request these changes in a timely fashion so that new instructor's credentials can be verified by the coalition or its contractor. However, based on the results of the file review, the OEL review team found that the coalition lacks a consistent process for tracking and processing changes in VPK classrooms. Although there were indications that some classroom and instructor changes were reported to the coalition's contractor (ECS), the team found two provider classrooms where changes in instructors were not reported to ECS. In addition, some of the classroom changes reported to ECS were not processed to ensure the new instructors possessed appropriate credentials.

Educational Service Delivery —————

Section 411.01, Florida Statutes, outlines various educational components that coalitions must consider in implementing their School Readiness programs. These components include the use of developmentally appropriate curricula by providers and the implementation of health and developmental screenings and assessments for children participating in the program. As provided for in statute, coalitions must address these elements as part of their school readiness plans. The plans must be approved by the Agency for Workforce Innovation.

To determine how the coalition is addressing these components, the review team reviewed the coalition's school readiness plan, interviewed the executive director, coalition program staff, and personnel from ECS. In addition, the team examined the coalition's contract with ECS, board meeting minutes, grant initiatives, mini-grant program guidelines, provider agreement, and inclusion reports.

Pursuant to its approved school readiness plan, the Putnam and St. Johns coalition and its contractor are implementing a variety of initiatives to improve the delivery of educational services for early learning programs. These initiatives include health and developmental screenings, provider support and technical assistance, and professional development opportunities.

Corrective Action Requirements

The Putnam and St. Johns coalition has responded to previous OEL recommendations for improvement, although implementation remains incomplete. The coalition continues to address weaknesses in the areas of governance and operations, contract and grant administration, VPK implementation, and eligibility determination. To correct the weaknesses found by this review, the coalition will:

- Consistently provide orientation for new board members and updated training for experienced board members.
- Ensure committees are equally represented by both counties and the members understand and adhere to quorum requirements.
- Continue to follow recommendations from the December 2005, Special Review regarding meeting minutes and packets. It is also recommended that the coalition look at other board packets across coalitions and create a simple and easy to follow format for future board meeting packets.
- Establish clear roles and responsibilities for contract management and assign the duties to an employee(s) who has sufficient skills and time to perform the function effectively.
- Implement a comprehensive monitoring process that ensures contracted services are delivered in a manner consistent with contracted purposes and requirements.
- Develop, train, and implement an effective and comprehensive monitoring plan ensuring eligibility determination and re-determinations are accurately calculated, recorded, and processed. It is also recommended that the coalition request the assistance of other coalitions, field analysts, and Western Kentucky for the development, training, and implementation of quality eligibility monitoring processes.
- Establish policies and processes for verifying provider eligibility for VPK that ensure providers document and substantiate the credentials of their instructional staff before participating in the program.
- Establish a consistent method for tracking and processing teacher and classroom changes in the VPK program and provide regular updates and training to providers to ensure they are following prescribed procedures.

- Establish policies and procedures for implementing the new Federal Poverty Level (FPL) and sliding fee scale in a timely fashion to ensure eligible parents receive services, and are assessed an appropriate and accurate co-payment.

In addition, the coalition will submit a detailed corrective action plan to OEL within 30 calendar days from the receipt of this report to demonstrate the steps it will take to improve oversight and management of fiscal operations. This plan will address improved processes for providing and reporting fiscal information to the board, additional procedures for tracking and analyzing administrative expenditures, improved procedures for paying its contractor in a timely fashion, and methods to ensure early learning providers are receiving appropriate payments for services provided.

Finally, the coalition will take steps to strengthen oversight of eligibility determination processes to ensure its contractor is meeting all applicable, law, rules, and policies. The coalition must examine and correct all School Readiness case files errors (eligibility and re-determinations) identified by the OEL review.

The coalition will submit evidence within 30 calendar days from the receipt of this report that any fiscal irregularities created by these errors are being resolved. Further, the coalition must submit evidence to the OEL within 90 calendar days from the receipt of this report reflecting the coalition has:

- examined all case files for correct eligibility and re-determinations
- taken steps to resolve any financial errors in payment found by the coalition's review

The OEL reserves the right to re-examine the coalition's records and make provisions for restitution of improperly applied funds as necessary

Appendix A

Indicators/Expectations/Standard Levels of Service

Performance Expectations for Governance and Operations

- 1 The coalition clearly delineates the roles and responsibilities of the board and the executive director in order to promote effective working relationships.
- 2 The coalition organizes efficient board meetings that are accessible to the public.
- 3 The coalition clearly defines its organizational structure, including procedures to effectively manage coalition personnel.
- 4 The coalition's process for managing information supports daily operations.
- 5 The executive director and coalition board exercise effective oversight of the coalition's financial operations.
- 6 The executive director and coalition board exercise effective oversight of the coalition's programmatic allocations and development.

Performance Expectations for Grants and Contract Management

- 1 The coalition has policies and procedures to ensure effective and efficient procurement of commodities and services.
- 2 The coalition has policies and procedures to ensure the awarding of a contract is fair, equitable and cost-effective.
- 3 An individual(s) is(are) assigned responsibility for managing coalition contracts.
- 4 The coalition has policies and procedures in place to monitor both administrative and programmatic aspects of all contracts.

Excerpts from the Standard Levels of Service for Child Care Resource & Referral

- 1 Each ELC is responsible for the coordination and/or provision of CCR&R services in their service area. Each ELC must ensure all CCR&R services are provided, including but not limited to the following responsibilities:
 - Designating/training/supervising CCR&R Staff
 - CCR&R services for all families and providers
 - Resources for families and providers (including but not limited to information on resources, VPK, financial assistance, School Readiness, Florida KidCare Insurance, CCEP, employer initiatives)
 - Designating/training/supervising inclusion services/Warm Line staff
 - Provider outreach and recruitment
 - Community outreach and collaboration
 - Reports (Monthly, Quarterly, ad hoc) and community awareness plans
 - DCF Reports and Information
 - Data collection/updates (for providers/families)
 - Coalition Continuity of Operations Plan (COOP)
- 2 CCR&R Coordinator/designated trainer must use the Quality Assessment form to observe each CCR&R specialist, (including but not limited to School Readiness staff/ELC staff) conducting a complete family interview and generating referrals at least twice a year.
 - The Quality Assessment Roll-up Report must be sent to the CCR&R Network Office during the second and fourth fiscal quarters detailing the staff name, date of assessment, and result (Excellent, satisfactory, poor).
 - The Quality Assessment form must be kept on file at the ELC/R&R office for review by Network staff during assessment visits and/or onsite training/TA visits.

Excerpts from the Standard Levels of Service for Child Care Resource & Referral (cont.)

- 3 Each ELC must complete an internal CCR&R Programmatic Assessment. Assistance is available from coalition analysts and CCR&R Network staff.
- 4 ELC and CCR&R Staff must respond in a timely manner to the AWI-OEL monitoring staff's request for a scheduled monitoring date, be available for interviews, and provide all necessary documents as requested during the monitoring session.
- 5 Work to promote awareness of the Child Care Executive Partnership and other employer initiatives. Training and TA is available upon request. Possible activities may include but are not limited to:
 - Speaking at employer benefit events
 - Speaking at local Chamber of Commerce meetings
 - Speaking at Kiwanis, Rotary, or other service club meetings

Performance Expectations for Eligibility Determination

- 1 The coalition adheres to eligibility priorities consistent with laws, rules, and policies.
- 2 The coalition has policies and procedures in place to ensure, regardless of the method of registration, the application, enrollment, and re-determination processes are easily accessible for parents and families.
- 3 The coalition has policies and procedures in place to ensure an effective and efficient eligibility determination process that complies with laws, rules, and policies.
- 4 The coalition has policies and procedures in place to ensure all families receiving school readiness services are assessed an appropriate parent co-payment fee.
- 5 The coalition has a process in place to verify that providers meet acceptable standards.

The coalition has an efficient process in place for processing provider payments and meeting attendance verification requirements.

Performance Expectations for Educational Service Delivery

- 1 The coalition has a comprehensive plan for improving the educational services of early childhood providers in its service area.
- 2 The coalition supports providers in using curricula that are effective and developmentally appropriate.
- 3 The coalition ensures that providers use pre and post assessment data to make sound decisions about teaching and learning.
- 4 The coalition has identified a process to demonstrate that its board has discussed, chosen, and approved the assessment instrument and implementation process.
- 5 The coalition/service provider has an effective and comprehensive health and developmental screening program that is relevant, utilizes available resources, and facilitates parental participation.
- 6 The coalition has a system in place to offer and track training to all providers for professional development and on the health and developmental screening process.

Appendix B

Board Members

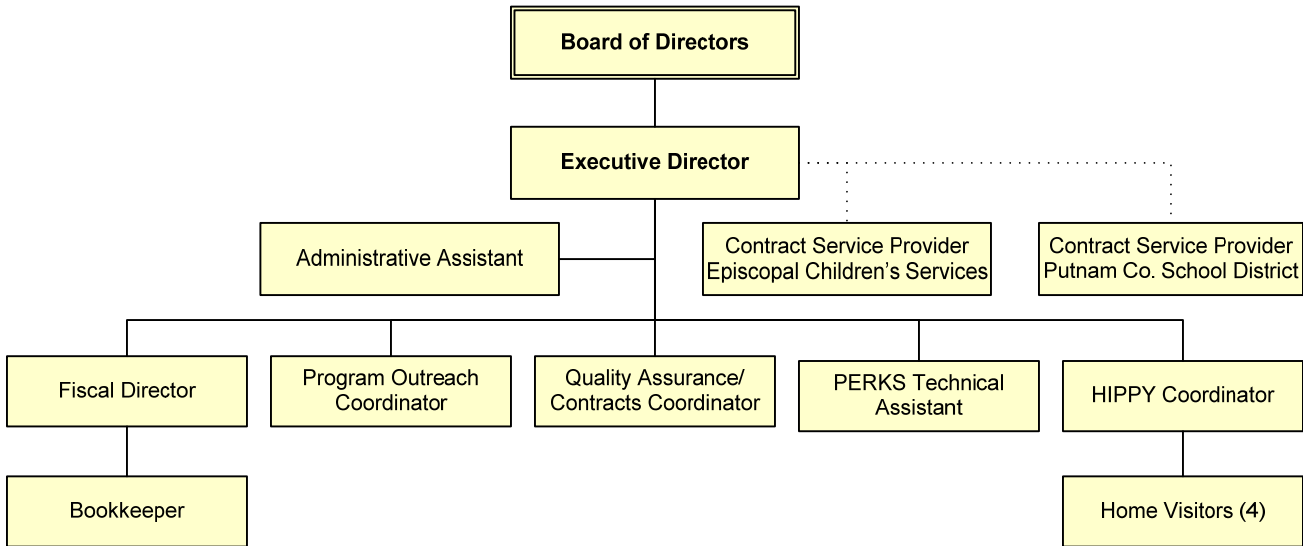
Board Member ¹	Mandated by s. 411.01, F.S.	Voting Status	Position/County Represents/Length of Term
Nancy Pearson	Yes/appointed by Governor	Voting	Chair-Private Sector/St. Johns/July 2009(4-year term)
Vacant	Yes/appointed by Governor	Voting	
Vacant	Yes/appointed by Governor	Voting	
Ester Tibbs	Yes	Voting	DCF Representative/Putnam/July 2008 (3-year term)
Lucy Brosky	Yes	Non-voting	School District/Putnam/July 2009 (4-year term)
Vickie Cofield	Yes	Voting	Regional Workforce Board/Both Counties/Seated until replaced
Diana Coyle	Yes	Voting	County Health Department/St. Johns/July 2009 (4-year term)
John Skelton	Yes	Voting	Community College/Both Counties/NA
Ben Rich	Yes	Voting	Board of County Commissioners/St. Johns/July 2007 (2-year term)
Mary Ann Holanchock	Yes	Non-voting	Head Start Director/St. Johns/July 2007 (3-year term)
Barbara Parker	Yes	Non-voting	Rep. Private Child Care Provider/St. Johns/July 2008 (3-year term)
Sylvia Woodard	Yes	Non-voting	Rep. Faith Based Child Care Provider/St. Johns/ August 2010 (4-year term)
Kathy Mankinen	Yes	Non-voting	Rep. Programs for Children with Disabilities/St. Johns/July 2007 (2-year term)
N/A	Conditional	Voting	Children Services Council or Juvenile Welfare Board/St. Johns/Seated until replaced
N/A	Conditional	Non-voting	Child Care Licensing Agency

¹Board membership as submitted with the revised plan on 11/25/2006. Members' names in **bold** are new members.

Board Member ¹	Mandated by s. 411.01, F.S.	Voting Status	Position/County Represents/Length of Term
Vacant	Yes	Voting	Central Child Care Agency Admin./ (3-year term)
Sam Collins	No	Voting	Private sector/Putnam/July 2007 (2-year term)
Francisco Jimenez	No	Voting	Private sector/Putnam/January 2008 (4-year term)
Greg Walker	No	Voting	Private sector/Putnam/September 2009 (4-year term)
Alice Dement	No	Voting	Private sector/St. Johns/January 2009 (4-year term)
Malinda Peeples	No	Voting	Private sector/St. Johns/July 2008 (3-year term)
John Birney	No	Voting	Private sector/St. Johns/May 2010 (4-year term)
William (Chip) Dew	No	Voting	Private sector/Putnam/November 2010 (4-year term)
Alex Sharp	No	Voting	Private sector/Putnam/November 2009 (3-year term)
Kenneth Forrester	No	Voting	Private sector/St. Johns/July 2009 (4-year term)
Angelia Hough	Optional Member	Non-voting	Family Home Provider Rep./Putnam/July 2009 (3-year term)
Diana Wasson	Optional Member	Voting	DCF Licensing/St. Johns/December 2008 (2-year term)

Appendix C

Coalition Organizational Structure



Coalition organizational structure as submitted with the revised plan, November 25, 2006.

Appendix D

Master List of Contracts/Grants

- I. Episcopal Children's Services, Inc.
- II. Putnam County School District
- III. St. Johns County Board of County Commissioners
- IV. United Way of St. Johns County, Inc.
- V. Agency for Workforce Innovation, Office of Early Learning, School Readiness Grant
- VI. Agency for Workforce Innovation, Office of Early Learning, VPK Grant Award
- VII. Agency for Workforce Innovation, Office of Early Learning, VPK Outreach and Awareness Grant Award