

STATE OF FLORIDA
GOVERNOR
CHARLIE CRIST

AGENCY FOR WORKFORCE
INNOVATION
DIRECTOR
MONESLA BROWN

OFFICE OF EARLY LEARNING
(850) 921-3180
DEPUTY DIRECTOR
BRITTANY BIRKEN

ACCOUNTABILITY, RESEARCH, AND
DATA QUALITY MANAGER
JOHN HUGHES

COALITION PERFORMANCE REVIEW
SUPERVISOR
TAMARA A. PRICE

PERFORMANCE REVIEW STAFF
ED HACHENBERGER
RENEE LISS
ANDREA MINUS
GINGER TATE
REGINAL WILLIAMS
PAT WEYER
ANDREA RAINES
VIVA HENRY
LISETTE LEVY

INTERNAL QUALITY ASSURANCE
MARTHA HAYNES
LAURA KATE BARRETT
BETTY WALLACE

REPORT NO. 07-07.01
DECEMBER 2007



PERFORMANCE REVIEW OF THE EARLY LEARNING COALITION OF OSCEOLA REPORT 07-07.01

Results in Brief

In accordance with Florida law, the Agency for Workforce Innovation (the Agency) conducted a performance review of the Early Learning Coalition of Osceola County (the coalition or the Osceola coalition). The on-site review took place the week of March 26–30, 2007. The review examined the period of coalition operations from July 2005 through February 2007. This coalition is the fifth to be reviewed under this coalition performance review process. A separate report dated May 25, 2007, contains a review of eligibility determination for early learning programs in Osceola County.

The Osceola coalition has several notable accomplishments and, in some aspects of program implementation, the coalition is operating its programs in a manner that complies with state and federal rules and regulations. The coalition continues to build effective community partnerships, and demonstrates creativity in refining operations and business processes. Some notable accomplishments include:

- Initiating efforts to improve its implementation of educational service delivery and an astounding community outreach program.
- Maintaining strong board processes and community partnerships that engage board members in the coalition's day-to-day business operations.
- Building relationships with parents, child care providers, and the Osceola County community.
- Offering numerous child care provider training opportunities

However, some issues that diminish the coalition's overall effectiveness remain, particularly in the areas of coalition operations and program administration. These issues include:

- Limited monitoring of contracted service delivery.
 - Improper procedures for conducting board business.
 - Lack of signed security agreement forms.
 - Exceeding administrative spending limits for VPK.
 - Poor performance in key aspects of child care resource and referral service delivery.
-
-

Scope and Methodology

Florida law requires the Agency for Workforce Innovation (the Agency) to monitor and evaluate the performance of each early learning coalition’s administration of the School Readiness and Voluntary Prekindergarten (VPK) education programs [s. 411.01 (4) (l), F.S., s. 1002.75(1), F.S., and 45 CFR 98.11 (b) (6)]. Additionally, Florida Statutes Chapter 411.01(3) (m) gives the agency authority to identify best practices for early learning coalitions, to improve the outcomes of school readiness programs by providing coalitions with quality indicators for sound business practices.

To accomplish this, the Agency 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 were developed in spring 2006. As a result, some of the expectations were defined after the review period covered by this report. The performance criteria include a combination 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: educational service delivery, governance and operational processes, grant award and contract management, and program access and availability (s. 411.01(4) (l), F.S.).

In addition, the Agency 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 Osceola coalition is meeting the performance expectations and the Standard Levels of Service, the Agency 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 Enhanced Field System (EFS).

Background

History of Operations. The Early Learning Coalition of Osceola County, Inc. began operations on September 6, 2000, in response to the passage of Chapter 411, F.S. by the Florida legislature. Serving fewer than 2,000 children at the time of its incorporation, Osceola is among the smallest coalitions in the state. The coalition’s expenditures for the School Readiness and VPK early learning programs for fiscal year 2005–06 totaled \$10, 624,737, with a total of \$12,128,227 in expenditures for fiscal year 2006–07. Details of key budget areas and reported expenditures appear in the tables below.

Early Learning Coalition of Osceola Reported School Readiness (SR) Expenditures		
Area	2005–06	2006–07
Administration (97BBA)	\$287,744	\$293,834
Resource & Referral (97Q14)	\$42,410	\$101,238
Eligibility Determination (97BDE)	\$286,215	\$300,471
Monitoring w/ other non-direct OCAs (97BBD)	\$72,994	\$120,949
Inclusion Services (97QIN)	\$7,390	\$7,672
SR Quality Initiatives (97QOO)	\$438,059	\$503,844
Infant and Toddler Quality (97INT)	\$60, 911	\$95,151
Program Services (97ROO-97TNW)	\$5,319,681	\$5,059,678
Total Expenditures	\$6,513,404	\$6,482,837

Source: The Agency Grant Management FLAIR Expenditures, OCA Reconciliation as of November 1, 2007.

Early Learning Coalition of Osceola Reported VPK Expenditures		
Area	2005–06	2006–07
Administration (VPKADM)	\$145,659	\$118,050
Enrollments (VPENR)	\$64,205	\$129,504
Monitoring (VPMON)	\$1,758	\$2,179
Outreach and Awareness (VPLCM)	\$10,000	\$10,405
Program Services (VPPRS)	\$3,744,052	\$5,007,064
Total Expenditures	\$4,111,333	\$5,645,390

Source: The Agency Grant Management FLAIR Expenditures, OCA Reconciliation as of November 1, 2007.

The Osceola coalition provides early learning program services through two major contracts with Community Coordinated Care for Children, Inc. (4C Orlando) and the School Board of Osceola County (the school district or SBOC). Both 4C Orlando and the school district are the principal contractors delivering school readiness services, as well as providing the VPK program and the Child Care Resource and Referral program (CCR&R). *Appendix E—Osceola Coalition Contracts for 2006–07* lists these contracts by contractor, services provided, contract period, and amount.

Governance. The coalition’s board of directors serves as the policy-making entity that delegates authority to the coalition’s executive director. At the time of the review, the 20-member board consisted of 6 non-voting and 14 voting members representing Osceola County. Membership composition includes representatives from both the private and public sectors. *Appendix B—Early Learning Coalition of Osceola Board Membership* depicts board membership as submitted with the coalition’s plan.

The board is supported by a number of standing committees, made up of both voting and non-voting board members. Three of these committees provide executive, fiscal, and programmatic guidance for the board’s activities. A fourth committee provides advisory assistance to the board and its standing committees.

- **The Executive Committee** reviews strategies and operations of the coalition, making decisions on behalf of the coalition in between coalition meetings and acting as the overall leadership for the coalition.

- **The Finance Committee** is responsible for the overall management of cash flow regarding coalition funds, including the development and review of fiscal procedures, annual budget review with staff and other board members and oversight of other fiscally related issues/opportunities as identified.
- **The Program Committee** is charged with the development and oversight of operational and structural components that comprise the delivery system of early learning programs and services within Osceola County. It is also charged with the oversight of all program monitoring and ensures all required elements in early learning programs and services that directly impact the ability of children to become school-ready are met.
- **The Advisory Board** is comprised of community leaders and interested individuals recruited to assist with local early learning plan implementation. The advisory board may seat up to 20 members and may be recruited from either the public or private sector. At the time of the review advisory board members had voting privileges at the coalition committee level, but did not have voting privileges at the coalition board level.

Children Served. For fiscal year 2005–06, the Osceola coalition served a total of 1,915 children in VPK and 2,919 children in the School Readiness program, with 169 children receiving services from both programs. For fiscal year 2006–07, the Osceola coalition served a total of 2,368 children in VPK and 2,838 children in the School Readiness program, with 212 children receiving services from both programs.

Organization and staffing. At the time of the review, the coalition had an administrative staff of four employees implementing the programmatic aspects of the coalition’s mission. These include the executive director, quality initiatives manager, fiscal manager, and administrative assistant. See *Appendix D—Coalition Organizational Structure* for a diagram of the coalition’s organization.

Findings

The Agency analysts observed coalition accomplishments, compliance issues, and business practices during the site review. Recommendations regarding suggested business practices (best practice issues) appear separately in the *Management Assistance Addendum to Report 07-07 Performance Review of the Early Learning Coalition of Osceola County*. The following report of findings summarizes coalition accomplishments and compliance issues observed by the review analysts.

This report should serve as guidance for improving the processes and operations of the coalition. All compliance issues require a corrective action plan to be submitted by the coalition within 30 days of the report's publication, and a subsequent six month follow-up status report.

Educational Services Delivery

Chapter 411.01, Florida Statutes provides an outline of components for each coalition's school readiness programs, including 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, and the plans must be approved by the Agency for Workforce Innovation.

ACCOMPLISHMENTS

The coalition supports providers and families with quality enhancements and collaborative community projects

The ELC of Osceola County has taken an innovative approach in the delivery of their educational services system for the School Readiness and VPK programs, offering a variety of provider initiatives and professional development opportunities, as well as collaborative projects for the communities served. A comprehensive multi-year educational service delivery plan was developed to include the identification of three primary stakeholder groups in their service area — parents, child care providers, and the civic/business community. As a part of this plan the coalition developed and identified specific goals for each of these three stakeholder groups, as identified below.

The initiatives designed to meet the goals of the first stakeholder group, "Parents," included, but were not limited to: monthly parent newsletters; ACCESS Osceola—positive parenting messages on their community television channel; several community events; two family early literacy initiatives (*Every Child Ready to Read and Early Literacy Family Nights*); parenting workshops; four bilingual initiatives (translation services for early education family events, bilingual staff, bilingual materials and a Latino Initiative—outreach to Spanish businesses for early education support including volunteerism and donations); a family concert featuring "Mr. Al;" and parenting information on the coalition's website. Two initiatives in the parent stakeholder group highlighted in this report include:

- **Quality Star Program.** To assist parents with child care provider selection, the coalition developed and implemented a quality rating system that parents can access to review provider program evaluation scores.

The 5-Star Provider Quality Rating System allows parents to compare the scores received by all school readiness providers, as well as comments from the providers themselves.

- **Health Initiatives.** The coalition has the Vision Quest free vision screening initiative, which is a collaborative grant totaling approximately \$80,000 annually that Vision Quest received to provide free vision screening and glasses to the children in the Osceola community. The health initiatives also included the Bright Smiles, Bright Futures initiative which focuses on dental hygiene and the Keep Kids' Hands Clean Initiative, which focuses on preventing the spread of germs.

The coalition has stated during this review that they have invested most of their resources into building and maximizing goals in the "Child Care Providers" stakeholder group. Many of the initiatives in this group, include, but are not limited to: a comprehensive early education program evaluation plan; a provider staff development plan; VPK training and support initiatives; Provider Advisory Councils; bilingual services; and early education information on the coalition's website. Child care provider stakeholder initiatives highlighted in this report include:

- **Sending Out Support (SOS).** This collaborative initiative between the coalition, the school district, and the United Cerebral Palsy (UCP) Child Development Center provides onsite technical assistance to providers serving children with special needs. Directors and teachers can request support and receive an individual evaluation for the child that provides a special instruction plan and one-on-one support for the child and teacher. The program helps teachers gain the knowledge and skills to provide support and intervention services for special needs children
- **Providers Acquiring Accreditation and Licensing (P.A.A.L.) Initiative.** In collaboration with 4C, the coalition has developed and implemented the Providers Acquiring Accreditation & Licensing (P.A.A.L.) program. This initiative is designed to assist providers who are working toward achieving licensing or accreditation. The 4C Community Specialist provides in-depth technical assistance to providers participating in this initiative to help streamline the licensing or accreditation process. As an incentive for the provider, upon becoming licensed or accredited, the provider receives gift certificates to purchase early education related materials for their facility.
- **Going On-site to Activate Lessons (G.O.A. L.) Initiative.** In collaboration with 4C, the coalition has developed and implemented the Going On-site to Activate Lessons (G.O.A.L.) program. This innovative

program assists early childhood providers to design and implement lesson plans. The providers receive a list of activities on a specific area monthly. In order to ensure that the activities are implemented and that the provider has gained knowledge on how to administer a lesson, 4C's Early Learning Team visits the provider and role models the activities.

- **Health and Safety Checklist.** The coalition requires the contractor to conduct and complete a health and safety checklist as a condition of accepting the informal, registered, or exempt providers' agreements. The contractor conducts health and safety checks during an unannounced visit to the provider. The provider may receive technical assistance from the contractor/coalition if the completed checklist demonstrates deficiencies in health or safety in the child care environment.
- **Emergency Preparedness.** The Coalition has developed a training designed to prepare providers to deal with all types of emergencies. In addition to the interactive training offered in partnership with the Osceola County Emergency Services Department, Osceola County Fire Department and Osceola County Sheriff's Department, an *Emergency Handbook* has been developed and distributed to providers who participate in this training initiative, which can be customized to act as a child care operations Continuity of Operations Plan (COOP).

It is important to note that on September 21, 2006, the Agency for Workforce Innovation's Chief of Staff gave special recognition to the Osceola Coalition for their Emergency Preparedness Initiative. This coalition was presented with the first and only *Certificate of Appreciation* for implementing this localized best practice.

- **Provider Web-based Comment and Bartering Boards.** The coalition has developed two interactive website tools to help facilitate coordination and communication among early learning programs.
 - The first tool, the *Comment Board* webpage, is designed to allow providers to enter information on, by subject matter that all other providers may view. Subjects may include, but not be limited to: free or inexpensive community resources, great field trips, etc. By providers entering/sharing their information and resources, a consolidated list of resources and ideas is developed and may be shared and utilized by all.
 - The second tool, the *Bartering Board*, allows providers to sell and/or trade items amongst themselves. EX: A provider may purchase a large shelving unit for a classroom and may post their smaller shelving unit

on the bartering board. They may sell this item or trade it for other items they need, such as playground equipment, furniture, or other equipment/materials as identified. This initiative is currently being marketed to providers and has not been fully implemented to date.

The coalition is currently focusing its efforts to implement the initiatives in its third stakeholder group – “Civic/Business Community.” Initiatives still in the planning stages for this stakeholder group include, but are not limited to: CCEP, business advisory council, speaker's bureau, and a quarterly round table. The coalition has successfully generated focused media exposure and developed a website that will provide information about the coalition and the early learning initiative to the general community. One initiative that has been fully implemented in the civic/business community stakeholder group highlighted in this report includes:

- **Very Important Partner (VIP) Program.** This program matches community resources with early learning needs. Through this initiative, Walt Disney World, Inc. (WDW)'s Disney Hands Helping Kids Shine program has donated over 1000 books to date in support of WEE Read Family Literacy Nights, approximately \$30,000 in Disney merchandise, over 350 backpacks for low income school age children, 30 computers to support the coalition's technology initiative, and \$15,000 in financial donations during the last 3 years for use by the coalition to purchase food, early learning materials and other items as identified. WDW has also provided a guest appearance by “Belle” to all WEE Read Family Literacy Nights. The Head Start program has also received donated books from WDW to support early literacy.

Other companies who have donated resources through this initiative include, but are not limited to: Tupperware, Kissimmee Utility Authority, Orlando Magic Foundation, Valencia Community College, Osceola Health Department, Osceola County Sheriff's Office, Orlando Sentinel, Kaplan, Lakeshore, Wright Group, Goodwin Realty and Associates, Child Craft, and Scholastic.

COMPLIANCE ISSUES

Questionable practices contradict the coalition's evaluation of VPK programs as 'in compliance'

As mentioned above the coalition has many outstanding initiatives; however, to ensure individual providers comply with VPK program requirements and deliver effective programs, consistent and timely monitoring of providers is essential. As reflected in the *Grant Award and CCR&R*

sections of this report, the coalition's limited performance in monitoring contracted service delivery allows questionable practices to go unaddressed.

One such questionable practice resulted in parents being confused by VPK center requirements. During a parent focus group several parents stated they were asked to bring supplies (such as crayons, glue, and scissors) as a condition of their child's attendance at a child care center. Requiring expenditure from parents in return for VPK participation would be a violation of VPK law, which defines VPK as a "free, high quality program," and of the Agency policy, OEL-PI-0027-05, which prohibits a VPK provider from charging fees as a condition of a child's enrollment. The law allows an exception in cases where the child is enrolled in extended non-VPK care after the end of the VPK day (wraparound care). In these cases, the provider may require supplies for the non-VPK portion of the day.

When asked if their children were participating in wraparound care, which is a specific number of VPK program hours followed by a period of non-VPK extended care, these parents stated their children were only enrolled in the VPK program. The coalition must ensure providers' compliance with Florida statute concerning VPK program administration.

Governance and Operations

The Osceola Coalition's approach to governance and operations indicates a willingness to innovate and a commitment to continuous improvement. The board's executive members promote participation, having developed a number of strategies for keeping the board informed and engaged.

ACCOMPLISHMENTS

Board enrichment activities and communication with the coalition's community provide a solid foundation for governing early learning programs

The coalition has implemented some innovative approaches and activities to improve its governance and operations of early learning programs. Many of these activities are geared towards increasing avenues for community input and enriching board member understanding of early learning programs.

- **Provider Visits.** The board visited various school readiness and voluntary pre-kindergarten providers to orient new and existing board members to the local early learning child care system. Conducting yearly site visits to providers' child care centers is an effective method of providing board members with practical and relevant exposure to early learning program services.

- **Topical Training.** A board member survey asked what topics were of interest to board members, and the board used the compiled results to schedule ongoing board training. Self-selected topics help to refine the focus of board member orientation and increase the level of participation by individual members.
- **Board Retreats.** Annual board retreats encourage discussion of topics that will improve coalition service delivery. These retreats are used to discuss such issues as board member recruitment and strategies for using legislative leverage.
- **Provider Advisory Councils.** The coalition has established Provider Advisory Councils for private child care providers and family child care homes. The coalition meets with these councils to ensure regular and accurate communication between itself, contractors, and the providers.

COMPLIANCE ISSUES

To ensure the success of the School Readiness, Voluntary Prekindergarten, and Child Care Resource and Referral programs, coalitions must have an effective executive leadership structure. Specifically, coalitions must have a constructive and trusting relationship between their boards, committee members, executive director, and coalition employees. This relationship is in jeopardy when the parties do not understand or fail to adhere to their distinct roles in the governance process.

A coalition may use both formal and informal mechanisms to ensure each entity adheres to its proper roles and responsibilities. The board should be the policymaking 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. At a minimum, the coalition should establish clearly written bylaws and governance policies that comply with state and federal statutes regarding these roles and responsibilities.

Notwithstanding the above achievements, the integrity of the coalition board's decision-making process is compromised by inadequate management of voting processes to ensure quorums and prevent unauthorized voting.

The coalition's voting procedures could diminish the validity of Board decisions

Each coalition establishes its own bylaws, including the selection of a method of parliamentary procedures to provide structure and organization for board business operations. These procedures must establish, among other requirements, how the board constitutes a quorum and how motions are presented to the board for decision.

The Osceola coalition's bylaws set Robert's Rules of Order as a standard for parliamentary procedure for voting members. As a result, non-voting members do not have the right to make or second motions or to cast votes. Additionally, the coalition's bylaws do not provide conventions and processes for the delegation of board business to non-voting members, or their consequent recommendations to the board. Violations of these procedures and rules can potentially render a decision by the Board invalid.

- **Improper quorum.** The coalition failed to adhere to parliamentary quorum requirements at several Finance and Program Committee meetings. As an example, during the January 23, 2007 meeting, the Finance committee made motions and carried them with insufficient voting members present to form a quorum. Failure to form a quorum of voting members potentially renders these decisions invalid.
- **Improper assignment of voting privilege.** During the period of the review, coalition bylaws allowed voting privileges at the coalition committee level for Advisory Board members. The members of this committee are comprised of community leaders and interested individuals recruited to assist with local early learning plan implementation. Giving advisory boards members (who are not addressed in statute and policy and otherwise may be considered non-voting) voting privileges at the coalition boards committee level is inconsistent with statute and Robert's Rules of Order. The board adopted an amendment to the coalition's bylaws correcting this error as of the board meeting of June 07, 2007.

Actions by non-voting members. Board meeting minutes from September 21, 2006, show that the board's vote establishing spending limits for the executive director was based on a motion seconded by a non-voting member. Similarly, a motion to approve the coalition plan was seconded by a non-voting member during the same board meeting. Additionally, a non-voting member of the Program Committee seconded the recommendation to the board for the developmentally appropriate curriculum list (a part of the coalition plan) on May 18, 2006.

The Agency's General Counsel's office opinion states that "a non-voting member of a coalition board may not vote on board business, whether it is in front of the full board or a committee." Allowing non-voting members to vote on decisions of the board potentially invalidates the decisions of the body as a whole.

Coalitions clearly need to solicit the feedback and support of community members who may not sit on the Board or may

not have voting privileges. This can become a challenge, particularly at the level of committee deliberation and action. While the position of the General Counsel must stand, the Agency's plans to review the issues surrounding voting and non-voting members and the limits established by coalition by-laws.

The coalition's information management process is incomplete

The coalition is responsible for maintaining the security of parents' and children's confidential information. AWI policy and state law mandates protection for this information. While the coalition satisfies several requirements for managing information, the coalition did not meet the administrative protocol for protecting clients' confidential information.

The grant award agreement requires each coalition staff with access to clients' confidential information sign a security agreement form. Although the contractors who regularly use the Enhanced Field System (EFS) have signed security agreement forms, the four coalition staff members who have access to the system (but do not regularly use it) have not signed security agreement forms. This potentially opens the coalition to charges of inadequate safeguarding of parents' and children's information.

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 grant 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, 45 CFR 98.52, and the Agency. Administrative expenditures for the fiscal year 2005-06 for School Readiness were 4.4 percent.

However, the coalition exceeded administrative spending limits for VPK by a significant 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 5.65 percent, which represents over-expenditure for VPK administration by \$24,419.57.

Grant Awards and Contract Management

The coalition has two major contracts: Community Coordinated Child Care (4C Orlando) and the School Board of Osceola County (SBOC). The 4C Orlando contracted services include school readiness, early care and education

services and management, CCR&R services, client eligibility and certification services, local match attainment, provider recruitment and training, staff development, grant coordination, establishing a marketing system, technical assistance, and health screenings.

The SBOC contract services include proper implementation of quality initiatives and support services to school readiness caregivers, technical assistance, staff training and development, coordination of the Early Childhood Association (ECA) of Florida conference, management of the Preschool Literacy Initiative, “wrap-around” services, assessments, administration of the Sending Out Support inclusion project, and marketing the Child Care Executive Partnership program (CCEP).

While the Early Learning Coalition of Osceola County meets most requirements for procuring goods and managing contracted services, there are some areas where the coalition needs significant improvement.

COMPLIANCE ISSUES

Lease agreement does not comply with terms of grant agreement

The coalition’s four staff members are employed under a lease agreement between the board and 4C Orlando. Specifically, the coalition’s contract for services (employee leasing agreement) with 4C, dated January 2006, establishes the employees of the coalition as employees of 4C Orlando who are in turn “leased” to the coalition. While this arrangement has several benefits, such as reduced costs for health insurance, technically the employees of the coalition work for 4C Orlando.

The grant award agreement requires the coalition to monitor its sub-recipients, including central agencies, and specifies that at no time shall control over administrative functions be assigned to any individual or organization other than the coalition. As the operational staff of the coalition, these employees leased from the coalition’s central agency are directly responsible for managing the contract that employs them, and for monitoring the contracting agency. This arrangement is a violation of the grant agreement and presents a serious conflict of interest.

The coalition did not implement corrective action after monitoring 4C Orlando and did not monitor the contract with the School Board of Osceola County

To ensure the contracted services meet the terms and conditions of the contract and grant awards, early learning coalitions must actively monitor the performance of the contractor. This is critical in determining the quality of services provided. The Osceola coalition has developed

appropriate tools to satisfy its monitoring requirements. However, the coalition failed to follow up when errors were found during its monitoring of the 4C Orlando contract and the coalition did not monitor its contract with the School Board of Osceola County (SBOC).

- **4C Orlando.** The Agency review team examined the coalition’s monitoring records for VPK during the 2006–07 time period. Although the coalition reported findings for the 2006–07 review, it did not produce a corrective action plan or a follow-up report demonstrating the contractor’s satisfactory resolution of the findings.
- **School Board of Osceola County.** As a condition of its contract with the coalition, the School Board of Osceola County has agreed to monitoring and review by the coalition. The coalition did not monitor the deliverables of the contract. The coalition staff stated during interviews that they feel they lack the authority to monitor another governmental agency.

Child Care Resource & Referral

Child Care Resource and Referral (CCR&R) should serve as the “front door” to all services offered through the early learning coalitions and their contracted service provider. All parents, regardless of socio-economic status, seeking or needing financial assistance with child care should receive complete CCR&R services. All parents should receive 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.

The Osceola coalition contracts with Community Coordinated Care for Children, Inc. (4C Orlando) for CCR&R services. The contract totals \$60,248, and the terms of agreement include: providing child care consumer information, establishing a toll-free telephone system, maintaining and managing a comprehensive database of all early child care and education caregivers and community resources in Osceola County, among other aspects of the CCR&R program. Notably, 4C Orlando also makes available their quarterly publication, *The Source*, to both parents and child care providers to serve as a helpful, well-developed information resource for the care and education of children residing in the Osceola community.

However, the Osceola coalition has not implemented an effective Child Care Resource and Referral program. As structured at the time of this review, it is unlikely that the program is providing services that meet the needs of the community. Although the coalition has developed policies and procedures to comply with the CCR&R Standard Levels of Service required by the Agency, it has failed to correct its

contractor's implementation of these policies and procedures, which is flawed and uneven.

COMPLIANCE ISSUES

The coalition has not monitored its contractors to ensure the child care resource and referral program is delivered in a manner consistent with contracted purposes and requirements

The Osceola coalition has not fully monitored the service provider's delivery of the CCR&R program. The coalition's monitoring tool for the service provider does not adequately address the quality of the child care resource and referral services as delivered. For example, the monitoring tool for review of the 4C Orlando's services dated June 21–23, 2006, requires a documentation review for written CCR&R processes, but does not require validation that the processes as written are being followed. As such, the coalition cannot ensure its CCR&R program is meeting the Standard Levels of Service.

The coalition should ensure all programs managed by a contractor are meeting standards of performance set forth in the contract. This includes ensuring that the services are available, staff is trained properly, telephone numbers are in working order and answered by CCR&R staff certified at Level 1 or 2, parent inquiries receive adequate response, and data is complete and accurate in EFS. This review should be thorough and documented to provide verification to ensure programs are providing quality services to the public. Failure to properly manage these contracted services may result in the coalition's repayment of expended funds to the Agency for Workforce Innovation.

The coalition's child care resource and referral program for the Osceola service area performs poorly in key aspects of service delivery

After reviewing data for the last quarter of 2006, the review team found the availability of current and accurate information to help parents find quality child care rarely reaches the families for whom it was intended. Specifically, the total number of referrals made, updates and requests for other information reported for the Osceola service area is extremely low in comparison to similarly-sized coalitions. For instance, from January 2006 through December 2006, the Osceola coalition's contracted services provider (4C Orlando) generated 259 total referrals and requests for information. For the same period the coalitions of Collier County and Escambia County (serving birth to five populations of a similar size) generated 7,771 and 3,758 referrals and requests for information, respectively.

Additionally, the coalition's performance in generating referrals has gradually decreased over time. For example, in

2005, 4C Orlando generated 1,005 annual referrals for the Osceola coalition. In comparison, the 4C reported only 259 referrals for 2006. As such, this low number of referrals indicates parent-customer access to information about the program is almost non-existent.

Low numbers of referrals may be a result of multiple factors, including procedures inconsistent with the Standard Levels of Service, failure to follow up on telephone inquiries, provider data not updated in EFS, lack of R&R specialist training, and improper data entry at the time of parent interview. In any case, the declining number of referrals by the contractor over time has not been noted or addressed by the coalition. Specific performance deficiencies found during the Agency review include:

- **Contract inconsistent with Standard Levels of Service.** The coalition requires its contracted services provider to provide a minimum of three referrals for each parent. The Standard Levels of Service set the minimum number of referrals per parent at five. This indicates that the coalition has not required the contractor to meet the minimum Standard Levels of Service. This particular compliance issue directly contributes to the low numbers of referrals.
- **Little or no follow-up for parent inquiries.** The child care resource referral services telephone lines for the Osceola contract service provider are ineffectual. Parents do not receive responsive assistance to requests for quality child care information.

During the review site visit conducted March 26–30, six Secret Shopper opportunities (two office visits, four telephone calls) were conducted by the Agency staff. The office staff did not provide a referral during either of the office visits. The four calls were made to the Osceola CCR&R service center during normal working hours. However, only one call was answered and then routed directly to voicemail. As of May 2, 2007, Osceola staff has not returned any of the calls with a follow-up response. Although the contracted service provider has a parent package that includes standard CCR&R information, during the six attempts made by Secret Shoppers, *none of the customers were successful in obtaining a list of available child care centers.*

- **Provider information in EFS not updated.** The coalition's contracted service provider is responsible for the maintenance of the Enhanced Field System (EFS). This database is required to be used by all coalitions in the State of Florida. Each individual coalition is responsible for the accuracy of the information entered into the system. CCR&R programs are charged with administering a complete annual provider update. This update is sent to all child care providers in the system.

The update includes rates, accreditation codes, additional services provided, staff credentials, and a workforce survey. The information gathered from the providers is to be entered into EFS. This information is used to generate referrals.

However, Osceola providers in the EFS database are under-served as data entry is not consistently entered with sufficient detail to guarantee parents are given current and correct provider information. For example, during a review of the provider database, the review team discovered 66 Osceola program providers did not have Program Participation (a field identifying the provider type) entered and 10 providers did not have any schedule information entered. Furthermore, the contractor has not updated many provider codes in EFS within the past two years. The coalition is ultimately responsible for ensuring these requirements are met.

- **Insufficient CCR&R specialist training.** The Standard Levels of Service specify that CCR&R specialists must receive an orientation by the CCR&R Coordinator or designated trainer that includes practical instruction in data entry, how to explain facets of the early learning program options to prospective clients, and supervision during parent intake for at least one day. The coalition has not ensured these training and documentation requirements are met. Of 13 CCR&R specialists providing referrals in Osceola County, the contractor did not include 11 of these specialists on the staffing list, or provide records of completed required training/orientation.

For Action

The Osceola coalition is operating its programs in a manner that mostly complies with state and federal rules and regulations for some aspects of program implementation. Issues remain in the areas of governance and operations, grant award and contract management, child care resource and referral, and monitoring of contracted service delivery. To correct these weaknesses, the coalition will submit a detailed corrective action plan to the Agency within 30 calendar days from the receipt of this report demonstrating the steps it will take to:

Coalition Required Actions

- Ensure VPK providers are following VPK requirements as required by law. Including:
 - Prohibiting VPK providers from requiring the payment of fees or charging for services as a condition of a child’s enrollment.

- Adhere to proper parliamentary procedures, including:
 - Correcting irregularities of board procedures, including the re-assessment and validation of board actions undertaken in the absence of a physically present quorum of voting members.
 - Developing procedures that describe the boundaries and limits of participation in board business by non-voting members.
- Tighten the information management process, ensuring all persons with access to the Enhanced Field System have read and signed IT Security Agreement forms.
- Monitor VPK Administrative expenditures to remain within the 5% spending limit.
- Clarify the staffing agreement between the Osceola coalition board and the 4C Orlando contractor (not a designated employee leasing company) to specify exact responsibilities, compensation, and duties of leased staff. Ensure leased staff are not placed in positions leading to conflicts of interest or the appearance of impropriety, including:
 - Monitoring/management of employee contracts.
 - Hiring/firing/evaluation of other employees.
 - Reporting or validating contract service delivery by the contracting agency.
- Strengthen quality assurance processes, specifically monitoring, corrective action review, and follow-up reports for contracted services delivery. Including:
 - Require a corrective action plan for the findings associated with the coalition’s 2006-07 VPK monitoring of 4C Orlando. Produce a follow-up report demonstrating the contractor’s satisfactory resolution of the findings.
 - Initiate monitoring of the School Board of Osceola County’s School Readiness and Voluntary Prekindergarten services delivery, using its strengthened internal quality assurance processes and comprehensive monitoring tool.
- Implement a fully compliant CCR&R program, including:
 - Ensuring each parent receives appropriate information on ways to identify and select quality care to meet their child’s needs.
 - Ensuring parents receive current individualized provider referrals based on the parents’ specified needs.

-
- Monitoring CCR&R service to ensure 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.
 - Immediately dedicating sufficient trained personnel to adequately staff phone lines to ensure a 24-hour response to parent calls.
 - Ensuring all CCR&R staff providing services to families receives adequate training in CCR&R and achieves Level 1 or Level 2 certification before they assist families on the phone or in person.
 - Immediately contacting the CCR&R Network Office for technical assistance.
 - Ensuring all CCR&R data is reviewed and updated appropriately within 90 days of receiving this report.
 - Providing child care resource and referral services as required by law. Provide comprehensive response and follow-up for all child care resource and referral inquiries.

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

Agency Actions

As a result of issues raised during this review, the Agency has identified the following issue for follow up:

- The Agency will review its position on issues associated with the coalition bylaws and governance practices and will issue guidance to clarify how community and non-voting members may participate in Board and committee meetings.

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 Kid Care 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)

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

- 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.
- 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 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**

Name	Mandated/ Voting	Position	Organization	Term/ Financial Interest
Charles Rogers	Yes/Yes	Chair	First National Bank of Osceola Co. 920 N. John Young Pkwy Kissimmee, FL 34741	Mandated/ July 27, 2005– April 30, 2009
Mary Cooper	Yes/Yes	Vice Chair Private Sector Bus.	Goodwyn Realty 1481 Riviera Drive Kissimmee, FL 34744	July 1, 2006– June 30, 2009
Richard Patterson	Yes/Yes	Secretary Private Sector Bus.	540 Teacup Springs Ct. Winter Garden, FL 34787	July 1, 2005– June 30, 2008
Eric Saegebarth	Yes/Yes	Treasurer Private Sector Bus.	Orlando Sentinel Communications 804 W. Emmett St. Kissimmee, FL 34741	July 1, 2006– June 30, 2009
Vacant	Yes/Yes	Private sector Gov. Appointee		
Vacant	Yes/Yes	Private sector Gov. Appointee		
Stephanie Weis	Yes/Yes	Member DCF Staff	Dept. of Children & Families Program Administrator 2540 Michigan Ave. Ste A Kissimmee, FL 34744	
Carol Quick	Yes/No	Member District Superintendent of Schools	Osceola District Schools 817 Bill Beck Blvd. Kissimmee, FL 34744	Financial Interest
Myriam Traveiso	Yes/Yes	Member Regional Workforce Director	Central Florida Workforce 1392 East Vine Street Kissimmee, FL 34744	
Shannon Sell	Yes/Yes	Member County Health Dept. Director	Osceola Co. Health Department 1875 Boggy Creek Road Kissimmee, FL 34744	
Sylvia Zapico	Yes/Yes	Member President of Community College	Valencia Community College 1800 Den John Lane Kissimmee, FL 34744	
Kenneth Smith	Yes/Yes	Member Board of County Commissioners	Osceola County Commissioner 1 Courthouse Square, Ste 4700 Kissimmee, FL 34741	
Roger Popp	Yes/No	Member Head Start Director	Osceola-Seminole 4C Head Start 3500 W. Colonial Drive Orlando, Florida 32808	Financial Interest
Shawn Champion	Yes/No	Member Secular Provider	La Petite Inc. 130 Buenaventura Blvd.	Financial Interest

Name	Mandated/ Voting	Position	Organization	Term/ Financial Interest
		Representative	Kissimmee, FL 34743	
Vacant	Yes/No	Member Faith-based Provider Representative		
Heather Miller	Yes/No	Member	UCP Charter School 448 W. Donegan Avenue Kissimmee, FL 34741	July 1, 2005– June 30, 2008
Patricia Frank	Yes/No	Member Central child care agency administrator	Community Coordinated Care for Children (4C Orlando) 3500 W. Colonial Dr. Orlando, FL 32808	Financial Interest
Angie Sola	Yes/Yes	Member Private Sector Bus.	Walt Disney World Co. P.O. Box 10,000 Lake Buena Vista, FL 32830-1000	July 1, 2004– June 30, 2007
Patricia Orner	Yes/Yes	Member Private Sector Bus.	AANR 1703 N. Main St - Suite E Kissimmee, FL 34746	July 1, 2007– June 30, 2009
Algertha Diggs	Yes/Yes	Member Private Sector Bus.	Kissimmee Utility Authority 3084 Golden View Lane Orlando, Florida 32812	July 1, 2007– June 30, 2009
Nancy Ellis	Yes/Yes	Member Private Sector Bus.	AFLAC 2956 Stillwater Drive Kissimmee, FL 34743	July 1, 2007– June 30, 2009
Luchy Michaelson	No/No	Member Family Day Care Home Provider	A Bright Beginning Learning Center 1823 Wimbledon Street Kissimmee, FL 34743	July 1, 2005– June 30, 2008 Financial Interest
Ivette Garcia	No/Yes	Member DCF Staff (no local licensing agency)	Dept. of Children & Families 3165 McCrory Pl. Ste 200 Orlando, FL 32803	July 1, 2005– June 30, 2008

Appendix C

COMMITTEE MEMBERS

The Executive Committee is responsible for reviewing overall strategies and operations of the Coalition, making decisions on behalf of the Coalition in between Coalition meetings and acting as the overall leadership for the Coalition.

EXECUTIVE COMMITTEE

The Executive Committee is responsible for reviewing overall strategies and operations of the Coalition, making decisions on behalf of the Coalition in between Coalition meetings and acting as the overall leadership for the Coalition.

Areas of Responsibility

- Coalition management in between Board meetings
- Strategic planning
- Human resources
- Other functions as identified

Coalition Members

- **Charlie Rogers – Chair**
- Mary Cooper – Vice Chair
- Eric Saegebarth – Treasurer
- Richard Patterson – Secretary

FINANCE COMMITTEE

The Finance Committee shall be responsible for the overall management of cash flow regarding Coalition funds. This includes the development and review of fiscal procedures, annual budget review with staff and other Board Members and oversight of other fiscally related issues/opportunities as identified. This committee shall also analyze and provide recommendations to the Coalition regarding the overall financial structure and delivery system of early learning programs and services within Osceola County.

Areas of Responsibility

- Simplified point of entry / unified wait list/slot management
- Eligibility determination
- Payment rate schedule
- Sliding fee scale
- Parent fee collection
- Payment to early education and care programs issues/opportunities
- VPK/School Readiness budget oversight
- Coalition and contract budget management
- Fiscal related operational procedures
- Fiscal monitoring

Coalition Members

- Mary Cooper
- Pat Frank
- Richard Patterson
- Charlie Rogers
- **Eric Saegebarth - Chair**
- Myriam Travieso
- Stephanie Weiss

Advisory Members

- Phil Scarpelli

Working Members

- Andrea Perito

MARKETING COMMITTEE

The Marketing Committee shall be responsible for the development and implementation of the overall marketing and public relations plan for the Coalition. It shall also be responsible for fundraising functions as designated by the Coalition.

Areas of Responsibility

- Coalition Branding and overall public relations
- Communications/media Plan
- Business partnerships/sponsorships recruitment
- Speakers Bureau
- Fundraising

Coalition Members

- Orine Boyd
- Mary Cooper
- Nancy Ellis
- Patricia Orner
- **Charlie Rogers - Chair**
- Stephanie Weiss

PROGRAM COMMITTEE

The Program Committee shall be responsible for the development and oversight of operational and structural components that comprise the delivery system of early learning programs and services within Osceola County. It shall also be responsible for the review and oversight of all quality initiatives and enhancements designed to increase early learning program quality. It shall also oversee all program monitoring and ensure all required elements in early learning programs and services that directly impact the ability of children to become school ready are met.

Areas of Responsibility

- Quality initiatives for providers
- Quality initiatives for parents
- Resource & referral
- Enhancement services
- Extended day / extended year
- Coordinated staff development
- Linking families for self-sufficiency
- Parental choice
- Program / child evaluation criteria
- Provisions for school age children
- Parent involvement
- Staff-to-child ratios
- Linkage with Head Start and others
- Performance standards / outcomes
- Developmentally appropriate curriculum
- Character development
- Healthful & safe environment
- Age appropriate screening & assessment
- Early learning program monitoring
- Program related operational procedures
- Child outcomes

Coalition Members

- Shawn Champion
- Algertha Diggs
- Dale Husbands
- Luchy Michelson
- Heather Miller
- Roger Popp
- **Carol Quick - Chair**

Advisory Members

- Sherry Cain
- Sue Donovan
- Nan Johnston
- Bonnie Post

Working Members

- Amanda Banks
- Bexi Colón
- Sara Frontz
- Nancy Ryan
- Kathy Unger

NOMINATING COMMITTEE

The Nominating Committee shall be responsible for the recruitment of new members and the Presentation of the slate of officer nominations.

Areas of Responsibility

- Recruitment of Coalition members
- Present slate of officers annually

Coalition Members

- Assigned by Chair each year
- Assigned by Chair each year

AD HOC COMMITTEES

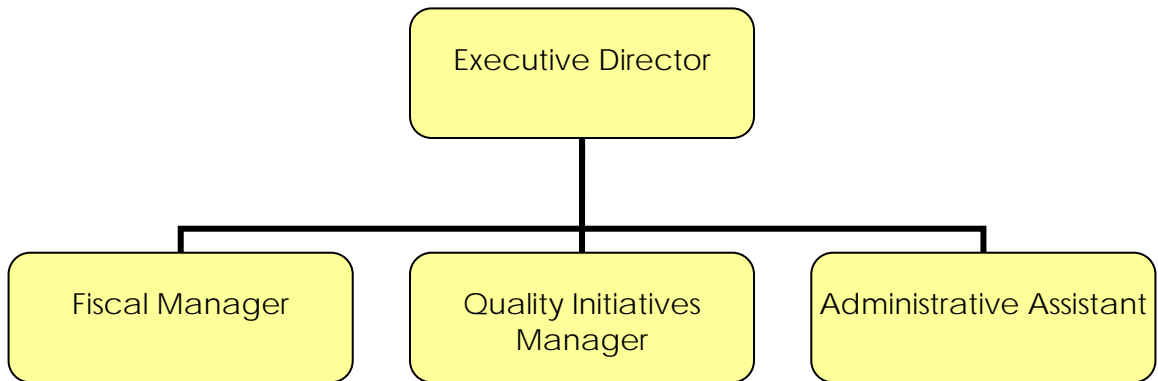
Committees Created as Needed

- Grievance Committee
- Procurement Committee
- Legislative Committee
- Other committees as identified

Review all grievances filed with Coalition
 Oversight of procurement process
 Develop and implement legislative strategies

Appendix D

COALITION ORGANIZATIONAL STRUCTURE



Appendix E**COALITION CONTRACTS FOR 2006-07**

Contractor	Services Provided	Contract Amount
4C Orlando 3500 W. Colonial Drive Orlando, FL PHONE: (407) 522-2252 Patricia E.Frank, Vice-President and CFO Susan Wojtowicz, Director of Osceola Operations	School Readiness	TOTAL School Readiness
	Administrative Services	\$178,262
	Eligibility	\$225,733
	Non-Direct Services	\$208,368
	Child Care Subsidy Management/Enrollment	\$152,706
	Parent Child Services	\$18,405
	Match Activities	\$8,845
	Quality Services	\$243,459
	Early Intervention funds	\$65,263
	Health Services	\$3,500
	Quality Assurance (includes \$45K infant toddler) (Funds 1 provider Consultant / 1 I/T positions)	\$ 72,019
	Provider Specialist	\$40,061
	Marketing (Parent Newsletter)	\$7,500
	GRANTS:	\$25,000
	Mini grants (non IT) *	
	(Use for training related	\$8,700
	Mini-Grants (IT) *	
	(Use for training related incentives)	\$15,998
	Training Incentive Grants	\$4,300
	Technical Support	\$5,000
	Provider Staff Training/Staff Development	\$16,400
	Infant Toddler Service	\$60,998
	CCR&R Service	\$60,248
	Slots Mgmt Services	\$5,081,470
	VPK	
	4C – Administrative	\$216,519
	Slots Mgmt Services	\$5,344,769
School District of Osceola Co	Wee Read Initiative	\$50,628
	Family Nights	\$1,600
	Staff Development Training	\$10,000
817 Bill Beck Blvd. Kissimmee, Fl 34744 Carol Quick (407) 870-4912	ECA Florida Conference Sponsorship	\$2,400
	Coordinated Staff Calendar Coordination	\$250
	Preschool Literacy Initiative	\$500
	Inclusion	\$6,300
	Curriculum Coach	\$19,530
	Data Collection & Management	\$2,000
	Quality Initiatives Coordination	\$9,648
	TOTAL	\$102,856

**PERFORMANCE REVIEW OF THE EARLY LEARNING COALITION OF OSCEOLA REPORT 07-07
[COALITION RESPONSE]**

Below is the response from the Early Learning Coalition of Osceola County regarding *Performance Review of the Early Learning Coalition of Osceola Report 07–07.01*, released for review by the coalition on November 15, 2007.

COMPLIANCE ISSUE

Lease agreement does not comply with grant agreement.

Coalition Response:

As reflected in our Osceola Coalition’s prior response, this has been an ongoing issue between the AWI/OEL. Our Coalition appreciates the opportunity that AWI has extended in working with our Coalition to satisfy this issue in a way that keeps our Coalition financially “whole” in the resolution.

COMPLIANCE ISSUE

The Coalition did not implement corrective action after monitoring 4C Orlando and did not monitor the contract of the School Board of Osceola County.

Coalition Response:

As reflected in our Coalition’s prior response, this has been an ongoing issue between the AWI/OEL. Our Coalition appreciates the opportunity to continue to work with AWI/OEL to resolve this issue.