



Board Action Item

Early Learning Coalition of Southwest Florida, Inc. July 26, 2006

Subject: Approval of the Following Policy Amendments:

ELCSWF-SR0018-06 Voluntary PreKindergarten Provider Reimbursement

Proposed Recommendation: Recommendation for approval of the amendments to the above policy.

Background Information:

The Coalition Plan and Best Practices require that each Coalition have in place a policy to address Provider Reimbursement. This policy was developed in a workgroup involving VPK staff. This policy is consistent with state law and AWI policies.

Action Taken: Barbara Saunders assigned Nancy Starr, Director of Policy, to convene a workgroups of Coalition staff to develop these policies. Meetings are held to address these areas.

All additions and deletions have been approved by the Executive Director and staff workgroup.

Coalition Meeting: July 26, 2006

Supporting Documentation: Draft Policy

Submitted By: Barbara Saunders, Executive Director
ELC Executive Board

Approved
Date:

Motion:
Second:



Early Learning Coalition of Southwest Florida, Inc.

The Early Learning Coalition of Southwest Florida will work in collaboration with our communities to develop successful learners and to support those in school for continued success.

<u>Subject:</u> Voluntary PreKindergarten Provider Reimbursement		
<u>Policy #:</u> ELCSWF-VPK0018-06	<u>Category:</u> Enrollment and Eligibility	<u>Reference #</u> OEL-VPK-510
<u>Approval:</u> Pending 7/24/06	<u>Effective Date:</u>	<u>Replaces (policy # and date):</u>

- I. **PURPOSE:** The purpose of this policy is to establish a policy for reimbursement procedures to providers of the Voluntary Prekindergarten program.
- II. **REVIEW HISTORY:** This policy replaces any previous written or verbal directives issued in any of the four counties.
- III. **CONTACT:** Barbara Saunders, Executive Director.
- IV. **PERSONS AFFECTED:** VPK Eligibility and Fiscal staff and Child Care Providers.
- V. **POLICY:** This policy sets the process in which VPK providers will be reimbursed for services.
- VI. **RATIONALE:** Reimbursement of Voluntary pre-kindergarten services must be conducted in a fair and consistent manner.
- VII. **CROSS REFERENCES:** Chapter 1002.51-79 Florida Statutes; Rule 60BB-8, Florida Administrative Code
- VIII. **DEFINITIONS:**

“**Authorized entity**” refers to either Child care of Southwest Florida or the Department of Education local school district.

“**AWI**” refers to the Agency for Workforce Innovation.

“**Contracted Central Agencies**” refers to “Child Care of Southwest Florida, Inc. (CCSWFL) and Redland’s Christian Migrant Association (RCMA), the agencies

contracted by the Early Learning Coalition of Southwest Florida, to carry out the daily responsibilities for VPK families and providers.

“Coalition” refers to **“Early Learning Coalition of Southwest Florida, Inc.** (ELC-SWF), a coalition created under s 411.01, F.S. and serving Collier, Hendry, Glades and Lee counties.

“Fiscal Year” refers to each year beginning July 1 and ending June 30 of the following year.

Parent” means a parent by blood, marriage or adoption and also means a legal guardian, licensed foster parent or individual identified with the legal ability to provide care for the eligible child.

“Provider” means the individual or facility responsible for the provision of Voluntary PreKindergarten services.

“VPK” means Voluntary PreKindergarten Education Program pursuant to Chapter 1002, Part V, Florida Statutes

“VPK Reimbursement Rate” means the hourly rate approved by the Legislature for voluntary pre-kindergarten services for a child in the VPK program. Pre-payment and reimbursement rates for children are based on, but not limited to, the status and duration of the child’s care, the amount designed by the legislature and the Agency for Workforce Innovation.

IX. **PROCEDURES:**

General Requirements

1. Payments to providers for voluntary prekindergarten services, will not exceed the maximum rate established by the Agency for Workforce Innovation (AWI). Rates remain in effect until changed by Agency for Workforce Innovation.
2. VPK providers have the choice of receiving a prepayment or reimbursement which must be identified in writing. The selection can be changed at the provider’s written request.
3. Providers may not charge parents any money for VPK services or registration. They may charge for supplemental child care if offered before or after the VPK class time. In addition, providers may ask for voluntary contributions in terms of time, supplies or donations, however they may not require any additional contributions. Services over and beyond VPK are the responsibility of the parent and can not be a condition of enrollment.

4. Providers must submit the following each year of participation; a new Provider Registration application (VPK10) and class information (VPK-11) and sign the Statewide Provider Agreement for VPK Services.
5. VPK provider status is not transferable or assignable to any other entity.
6. The provider will determine the program type and reflect the choice on Form VPK 11. Payment for VPK hours may not exceed 540 for the school year and 300 for summer months (May through August).
7. VPK providers are responsible for setting a schedule which is communicated on form VPK 11 and submitted to the contracted central agency. Any revisions to the schedule must be documented on the VPK 11 form and re-submitted to contracted central agency prior to implementation.
8. The VPK schedule of class times and duration must also be provided in writing to all parents who enroll their child.
9. VPK providers must notify the contracted central agencies prior to any changes such as class transfers; absences for “good cause”, VPK class schedule changes; changes in instructors and directors; temporary closures, location, ownership, etc.
10. The amount of reimbursement paid is the same for each child in a respective county. The actual amount of reimbursement may vary by county. The allocation per child for each county is determined annually by the Agency for Workforce Innovation through an analysis of factors such as estimated VPK students, administrative allocation and cost differential of county.
11. To receive reimbursement for VPK services, providers must submit accurate attendance records and sign each submission to reconcile the prepayment or receive reimbursement.
12. Daily attendance of children shall be taken and recorded by the parent, classroom teacher or facility documenting when each child enters and departs the program.
13. Student attendance and parent choice certificates (short or long) must be signed monthly by the parents and maintained by the VPK provider for 2 years. Parent verification forms must be on site at all times and available for review.
14. All required attendance documents should be submitted by the 1st of the month, but no later than the third (3rd) workday of the following month. Any attendance sheet rosters submitted after the 3rd working day may be processed the next reimbursement month.

15. Pre-payments or reimbursements may only be paid for children who have been issued a VPK certificate, and whose provider has received a confirmation number from the contracted central agencies. The ending date of VPK service shall be when the child receives 540 hours of VPK instruction during the school year or 300 hours during the summer.
16. The contracted central agencies shall run a report monthly which tabulates the # of hours the child has participated in the VPK program. This report should be run as often as necessary to adequately monitor the activities of children and providers to ensure no overpayments occur.
17. Neither the parent/guardian nor the provider will be reimbursed for any additional charges above the VPK funding.
18. The Coalition and CCSWFL is responsible for conducting audits of the VPK providers to validate their prepayments or reimbursement as described in policy # ELCSWF-VPK0016-06.
19. VPK providers will not be reimbursed for any child accepted into care without the prior written authorization from the contracted central agency.
20. If children are enrolled in a VPK program and the school readiness program with a different provider, the school readiness provider will receive a reduced rate. Because the school readiness program is based on full time (FT) and part-time (PT) and not the actual hours served, the VPK hours must be subtracted from the number of hours established as the child's "daily need". Six (6) (PT for purposes of hourly calculation) or 11 (FT); and then apply the formula for calculating the hourly rate.
21. When a VPK provider wishes to enroll a new child, the VPK provider must contact the contracted central agency and receive a confirmation number for the child.
22. The child and provider information is entered into the EFS system, the enrollment screen is completed and the child's confirmation # is placed in the notes.

ATTENDANCE

23. Each month, the contracted central agency mails the classroom attendance roster to the provider following the reconciliation from the previous month.
24. The provider is expected to compare the attendance roster to their own attendance records and make any corrections, if necessary, directly on the sheet. The Provider must sign and return the sheet by the 1st day of the month.

25. If the attendance sheet is faxed, the provider must maintain the original copy on site for 2 years. When auditing, CCSWFL and Coalition staff will check the faxed copy against the original.
26. Contracted central agencies review the returned attendance sheet and determine the numbers of hours to be paid for each child. Child attendance is then entered into the EFS system. Once the attendance sheet is processed against the EFS system, the documents are forwarded to contracted central agencies fiscal for payment or reconciliation.
27. Each VPK provider will receive a monthly summary printout reflecting the names of the children, number of hours per child and amount paid. Based on an actual enrollment/attendance, if the dollar amount owed to the provider is greater than the pre-payment amount, an additional payment will be made to the VPK provider by the contracted central agency. If the prepayment amount was greater than the actual enrollment/attendance supports, then the difference will be deducted at the following month's reconciliation or paid back to the contracted central agency by the provider.
28. VPK providers must review the reconciliation/reimbursement summary provided by the contracted central agency fiscal staff each month. They should report any discrepancy or underpayment within 30 days from the date the reimbursement was deposited or mailed.
29. Payment for attendance.
 - (a) Private providers or public schools must be paid for each instructional day that a child attends the provider's or school's VPK program. If a child attends part of a day's instruction, the private provider or public school must be paid for the instructional day.
 - (b) A private provider or public school may not be paid for an absence that is before a child's first day of attendance or after the child's last day of attendance.
 - (c) Payments for a child must be suspended when a child is absent from the VPK program on each instructional day in a calendar month. Payments for the child, including payments for absences accruing while payments are suspended, shall resume when the child subsequently attends the program. If the child does not resume attendance, the private provider or public school may not be paid for an absence after the child's last day of attendance.

Payment for absences.

A private provider or public school shall be paid for each instructional day that a child is absent from the provider's or school's VPK program not to exceed the following number of absences by the child in a calendar month:

- (a) Three or fewer unexcused absences; and
- (b) Seven or fewer excused absences. An absence is excused for purposes of this paragraph, if:
 - 1. The child's parent submits documentation of the absence in writing to the private provider or public school and the provider or school submits the documentation to the coalition or contractor;
 - 2. The documentation shows that the child is prevented from attending the VPK program on the instructional day because of one of the reasons listed in paragraph (33)(b); and
 - 3. Notwithstanding the requirements for documenting excused absences in paragraph (33)(b), the reason for the absence is documented by the child's parent.

30. Payment for additional excused absences.

A private provider or public school shall be paid for each excused absence that exceeds the number paid in a calendar month under paragraph (32)(b), if:

- (a) The child's parent submits documentation of the excused absence in writing to the private provider or public school and the provider or school submits the documentation to the coalition or contractor; and
- (b) The documentation shows that the child is prevented from attending the VPK program on the instructional day because of one of the following reasons and the reason is documented as follows:
 - 1. Illness or injury of the child or the child's family member which requires hospitalization or bed rest, as documented by a physician;
 - 2. Physician or dentist appointment, as documented by the physician or dentist;
 - 3. Infectious disease or parasitic infestation that prevents the
 - 4. private provider or public school from allowing the child to attend, as documented by the provider or school;
 - 5. Funeral service, memorial service, or bereavement upon the death of the child's family member, as documented by a

funeral director, death certificate, program from the funeral or memorial service, or obituary published in a newspaper of general circulation;

6. Life-threatening illness or injury of the child's family member, as documented by a physician;
7. Compliance with a court order (e.g, visitation, subpoena), as documented by the court order;
8. Special education and related services as defined in 20 U.S.C. § 1401 (2004) for a child with a disability, as documented by the child's individualized education program (IEP);
9. Observance of a religious holiday or service, or because the tenets of the child's or parent's religion forbid secular activity on the instructional day, as documented by a leader of the religious organization; or
10. Extraordinary circumstances that are beyond the control of the child and the child's parent, as documented by the child's parent and verified by the coalition or contractor.

31. Payment for additional absences for a family vacation.

A private provider or public school shall be paid for each absence that exceeds the number paid in a calendar month under subsections (2) and (3), not to exceed 5 absences in the calendar month, if the child's parent submits documentation in writing to the private provider or public school that the absences are because of a family vacation and the provider or school submits the documentation to the coalition or contractor. A private provider or public school may only be paid for a family vacation once per child in a program year.

32. Payment for temporary closures.

- (a) A private provider or public school may not be paid for a scheduled instructional day on which the provider or school temporarily closes because of circumstances that are within the provider's or school's control. If a private provider or public school temporarily closes because of circumstances that are within the provider's or school's control, the provider or school must revise the class schedule for a VPK class which the closure affects.
- (b) A private provider or public school shall be paid for a temporary closure if the provider or school submits documentation to the coalition or contractor in writing which demonstrates that the

closure is temporary and caused by circumstances that are beyond the provider's or school's control.

- (c) A private provider or public school shall be paid for a temporary closure without submitting documentation of the circumstances causing the temporary closure if the provider's or school's VPK site is located in a county in which government offices that are normally open to the public are closed by the county, state, or federal governments, or public schools are closed by the school district, because a state of emergency is declared to exist in the county by the county government, the Governor, or the President of the United States.
- (d) A private provider or public school must submit documentation of the circumstances causing the temporary closure if government offices remain open or a state of emergency is not declared to exist. A private provider or public school may not be paid for a temporary closure if the provider or school does not reopen or resume instruction after the closure. The coalition or contractor shall assist the parent of each child that the temporary closure affects with reenrollment of the child with another private provider or public school.
- (e) If a child does not resume attendance in the VPK program after a temporary closure, notwithstanding paragraph (35)(b), the private provider or public school shall be paid for the closure but may not be paid for an instructional day after the closure.
- (f) A private provider or public school may revise the class schedule of a VPK class which a temporary closure affects instead of payment for the closure.
- (g) A private provider or public school shall be paid for each temporary closure caused by circumstances that are beyond the provider's or school's control, not to exceed 10 instructional days per closure, as if each child attends the VPK program on each instructional day that the closure affects.
- (h) If circumstances cause more than one temporary closure that affects the class schedule of a VPK class, the private provider or public school may not be paid for more than a combined total of 10 instructional days for all of the temporary closures that affect the class schedule.

(i) If the combined number of instructional days affecting the class schedule of a VPK class from one or more temporary closures extends beyond 10 instructional days, the private provider or public school must revise the class schedule for each instructional day that the closure affects after the 10th instructional day, to the extent that the revised schedule:

- a. Must not extend beyond the last day by which the VPK class must complete instruction;
- b. Is not required to change the number of instructional hours per instructional day or the number of instructional days per week from the current class schedule.