



**VOLUNTARY PREKINDERGARTEN
COMPLIANCE POLICY
ELCPC-71.1
Revised October 13, 2011**

INTRODUCTION

The intent of this policy and procedure developed by the Early Learning Coalition of Pinellas County, Inc. (Coalition) is to provide interpretive guidelines for applicable services and standards as outlined in [60BB-8](#), the VPK Provider Agreement ([AWI-VPK 20](#)), [Attachment 1](#) of the VPK Provider Agreement, [s. 1002, F.S. 60BB-8](#). This Coalition policy and procedure is inclusive of all VPK providers.

This policy and procedure provides clear definitions and guidelines for VPK providers to follow. All providers must meet the requirements before becoming approved as a VPK provider. Enforcement described in this policy is designed for existing VPK programs that are not in compliance.

Failure to adhere to the terms of the Agreement/Contract or any violations described herein may result in the discontinuance of funding and parent notification of non-compliance.

The Early Learning Coalition of Pinellas County, Inc. reserves the right make exceptions to this policy.

Providers may appeal action taken in accordance with this policy in accordance with the [School Readiness/VPK Grievance and Dispute Resolution Policy \(ELCPC-10.1\)](#).

Table of Contents

Section I DEFINITIONS4

Section II NOTIFICATION REQUIREMENTS.....6

MONITORING8

ENFORCEMENT8

Section III STAFF QUALIFICATIONS.....9

MONITORING10

ENFORCEMENT11

Section IV PROGRAM REQUIREMENTS12

MONITORING13

ENFORCEMENT13

Section V CHILD DOCUMENTS.....14

MONITORING14

ENFORCEMENT14

Section VI PROVIDER POLICIES.....15

MONITORING16

ENFORCEMENT16

Section I

DEFINITIONS

Agreement: a binding document between two entities addressing the payment for services and the details of those services. ([AWI VPK 20 and Attachment 1](#))

Coordinated Child Care of Pinellas, Inc. (CCC): Agency contracted by the Early Learning Coalition of Pinellas County to administer VPK Child Eligibility determination and VPK Provider Reimbursement in addition to other designated School Readiness and VPK services. www.childcarepinellas.org

Corrective Action: Documented or demonstrated correction of noncompliance found during a desk audit or onsite monitoring visit.

Desk Audit: Offsite monitoring of a VPK program to ensure compliance with policies, documentation and records. Documents that may be requested include: current lesson plans and classroom schedule, VPK Enrollment/Attendance Certification form, Teacher attendance forms used to track child attendance, Child Attendance and Parental Choice Certificates (Monthly forms), Child Eligibility and Enrollment Certificates and provider attendance policy and enrollment policy that are given to parents. Findings of a desk audit could initiate an onsite monitoring visit.

Developmentally Appropriate Curriculum: A curriculum that is based on research and aligns with the VPK Performance Standards. Ch. 1002.67, Florida Statutes.

Good Moral Character: Affidavit signed by childcare staff, owners and directors affirming they have not been found guilty of or plead no contest to, regardless of adjudication, any charges listed in Ch. 435, Florida Statutes or under any similar statute of another jurisdiction. They must also acknowledge existence of any

criminal records relating to the offenses regardless of whether or not those records have been sealed or expunged.

Level 2 Background Screening: Security background investigations which include, but are not limited to fingerprinting for all purposes as required by F.S. Chapter 435.04, statewide criminal and juvenile records checks through the Florida Department of Law Enforcement, and federal criminal records checks through the Federal Bureau of Investigation. .

Onsite Monitoring: Visit by monitor to evaluate compliance with the VPK Provider Agreement, contract management and programmatic requirements by the Coalition or its designee. During the monitoring, the following topics are reviewed: Staff to child ratios, curriculum, lesson plans, assignment of approved VPK instructor and/or substitute instructor if applicable, and documents regarding VPK children to include the Child Eligibility and Enrollment Certificate, VPK Enrollment/Attendance Certification form, VPK attendance accuracy and provider attendance policy and enrollment policy that are given to parents.

Staff Child Ratio: Ratio of approved staff to children in a VPK class. The maximum ratio includes all children in a class regardless of funding source or age.

VPK Secondary Instructor: Assistant teacher in a VPK classroom required for classes with 11 or more children enrolled.

VPK Substitute Instructor: An individual assigned to serve as a substitute in the absence of the lead VPK Instructor.

Section II

NOTIFICATION REQUIREMENTS

Providers must meet notification requirements in the Provider Agreement ([AWI VPK 20](#)) and the corresponding [Attachment \(1\)](#) as set forth by the Coalition in order to maintain compliance with the Provider Agreement. Provider must be in receipt of written approval by the Coalition for all changes described below **prior to implementation in classroom or program.**

OWNERSHIP CHANGES

If ownership of a provider changes then the Provider must notify the Coalition in writing within 10 days before the change occurs.

- If the current Provider Agreement ([AWI VPK 20](#)) was signed by the previous owner then a new one needs to be signed and submitted by the new owner. Anytime this is signed, two copies with original signatures must to be submitted to the Coalition.
- Completed W-9 form.
- Revised [AWI VPK 10](#)
- Change of Ownership Form (Child Care Licensing)
- Finance Department Agreement for Automatic Direct Deposit form with voided check or blank deposit
- Advance Payment Accept/Decline Notice
- Copy of Child Care License (Or Change in Ownership Agreement)

DIRECTOR CHANGES

If there is a change in Director then the changes must be submitted to the Coalition in writing at least five days prior to implementation.

- If the previous Director signed the [AWI VPK 20](#) Provider Agreement on file then a new [AWI VPK 20](#) Provider Agreement must be submitted to the Coalition

- Updated Provider Agreement Registration Application ([AWI VPK 10](#)).

STAFF CHANGES

Instructor and/or secondary instructor changes are to be submitted to the Coalition in writing for approval at least five (5) days prior to implementation. Implementation may not begin until the provider is contacted by the Coalition informing the provider of approval. The following forms and document need to be submitted:

- VPK Change Notification Form (VPK-71F—7)
- Updated Class Registration Application ([AWI VPK 11A](#))
- Educational credentials
- Background screening information
- Attestation of Good Moral Character
- Proof of literacy training, if applicable

CALENDAR CHANGES

Class schedules may not be modified after a program begins.

1. Temporary closure affecting scheduled instructional hours that are **within** the control of the provider will not receive reimbursement for the instructional time disrupted by the closure. Notification of such closures must be submitted to the Coalition in writing within two days following resumption of VPK instruction.
2. Temporary closure affecting instructional hours due to circumstances **outside** the control of the provider must be provided to the Coalition in writing within two business days following resumption of VPK instruction according to the [AWI VPK 20](#).

Providers may apply for a waiver to allow the provider to modify their schedule if the closure is due to circumstances beyond their control. Exceptions must be approved by the Coalition Executive Director. The waiver request must be

submitted in writing within two business days following resumption of VPK instruction and include:

- Provider's Name and Address
- VPK class that was affected
- Dates that VPK was not offered
- Documentation of extreme circumstances
- Revised schedule indicating when the provider would like to restore the hours lost due to the closure.

3. Temporary closures caused by **Extreme Circumstances** as defined in [60BB-8.204](#) Uniform Attendance Policy for Funding the VPK Program will be addressed in accordance with AWI Rule.

TERMINATING OR DISCONTINUANCE OF VPK PROGRAM

Upon mutual termination of the [AWI VPK 20](#) between the Provider and the Coalition OR if the Provider decides to withdraw from the AWI VPK 20 then the Provider must notify the Coalition in writing at least thirty days prior to the termination of the program. Alternative arrangements for uninterrupted services must be made for children enrolled with the Provider in the VPK program at least thirty calendar days prior to the termination as well. Notification to include

- Provider Name and Address
- Date of Termination or Withdrawal from VPK Program, if the termination or withdrawal from the program is the provider's choice
- Details of alternative arrangements made for children to receive uninterrupted services.

VPK 10 AND 11 CHANGES

If any information submitted in either of these applications changes, the Provider must notify the Coalition in writing of said changes immediately.

A. Monitoring - Notification Requirements

Notifications received by the Coalition will be reviewed individually to ensure proper time frames have been utilized.

B. Enforcing - Notification Requirements

Failure to provide written notification within required time frames may result in a loss of funding for the days in which the change was already implemented and possibly extending until the change is processed.

Section III

STAFF QUALIFICATIONS

Staff qualifications must meet requirements outlined in Ch. 1002, F.S. and be approved by the Coalition in writing before a VPK program may begin or a change is implemented in the classroom or program.

VPK DIRECTOR CREDENTIAL

All VPK providers are required to have a director on staff with documentation of:

1. Current Director Credential approved by Florida Department of Children and Families
2. VPK Director Endorsement or Exemption

VPK INSTRUCTOR

All VPK instructors are required to have documentation of:

1. Level 2 Background Screening
2. Attestation of Good Moral Character
3. VPK Emergent Literacy if applicable.
4. Education Credential described in [Ch. 1002., F.S.](#)
5. Permission to be employed under section [435.06, F.S.](#)

VPK INSTRUCTOR SUBSTITUTE

All VPK substitute instructors are required to have documentation of:

1. Level 2 Background Screening
2. Attestation of Good Moral Character
3. Education Credential described in [60BB-8.410](#)

Note: Education Credentials are different for School Year and Summer programs.

All substitute instructors must be approved by the Coalition as a substitute. Assistants and directors may serve as a substitute instructor ONLY if they have been approved as a substitute by the Coalition. All approvals are documented in writing. Substitutes should be listed on the VPK 11A

Substitute instructors may be assigned to a VPK class for no more than 30% of a VPK Program. Providers are required to track the assignment of all VPK Substitute Instructors and maintain records for three years.

VPK SECONDARY INSTRUCTOR

All VPK secondary instructors are required to have documentation of:

1. Level 2 Background Screening
2. Attestation of Good Moral Character
3. Permission to be employed under section [435.06, F.S.](#)

VPK STAFF CHANGES

All changes in VPK staff including director, instructor or secondary instructor must be approved in writing **prior to implementation in classroom or program**. Providers must submit required documentation at least 5 business days before the proposed effective date to allow time for processing.

A. Monitoring - Staff Qualifications

Initial Approval

A VPK provider must demonstrate compliance in all areas before a VPK program is approved to begin. Providers must demonstrate compliance in areas of Staff Qualifications and Program Requirements to be approved as a VPK provider. All documentation must be kept in the VPK Provider Certification Files and undergo a two person quality assurance review by the Coalition or its designee.

Maintenance of Compliance

VPK providers are responsible for maintaining compliance with all Staff Qualifications and Program Requirements. As a *courtesy*, the Coalition will notify providers of impending expiration of a director credential, staff credential, Affidavit of Good Moral Character or background clearance 30 days in advance. Updated documentation will undergo a two person quality assurance review by the Coalition or its designee.

Onsite Monitoring

Onsite monitoring will be unannounced and include review of:

- Verification of approved VPK Instructor and Assistant Instructor
- VPK Substitute Instructor tracking information.
- Instructor/child ratio
- VPK attendance verification

B. Enforcement – Staff Qualifications

A VPK provider must meet all staff requirements before a program is approved. Failure to maintain compliance with staff qualification requirements could result in nonpayment for days affected by the non-compliance. Unresolved non-compliance could result in the termination of the AWI VPK-20.

Section IV

PROGRAM REQUIREMENTS

LICENSING OR ACCREDITATION

VPK providers must be in good standing and operating under a current license from Pinellas County License Board, legally licensed exempt or accredited by an association or agency recognized by the [Voluntary Prekindergarten Education Program](#).

STAFF CHILD RATIOS

The VPK instructor must be present during all instructional hours.

School Year

1 VPK Instructor: 11 students (VPK & non-VPK students.)

1 VPK Instructor AND 1 secondary instructor: 11 - 20 students (VPK & non-VPK students.)

Summer

1 VPK Instructor: 12 students (VPK & non-VPK students.)

CURRICULUM

Programs must use a curriculum to deliver VPK which:

1. Is developmentally appropriate
2. Is designed to prepare children for early literacy
3. Enhances the age-appropriate progress of children in attaining each of the performance standards adopted by the Florida Department of Education
4. Prepare children to be ready for kindergarten

*Instructional Hours include planned activities or experiences that implement curricula while an instructor is present and engaged in the activities or experiences. ***Children who are sleeping or napping are not considered to be participating in instructional hours.***

A. Monitoring – Program Requirements

Onsite Monitoring

Onsite monitoring will be unannounced and include review of:

- Staff Child Ratios
- Possession of Curriculum identified on the AWI VPK10 or Lesson Plans to reflect implementation of self-developed curriculum

Desk Audit Monitoring

Providers will be notified 5 business days in advance of desk audit monitoring and must submit:

- Evidence of Possession of Curriculum identified on the AWI VPK10 OR Lesson Plans for current week and one prior week to be identified by monitor to reflect implementation of self-developed curriculum.

B. Enforcement – Program Requirements

Failure to meet program requirements will result in technical assistance or a corrective action plan which allows 10 business days for the provider to demonstrate compliance. Non-compliances related to licensing, accreditation, instructional hours or staff ratios may also result in nonpayment for days affected by the non-compliance. Repeated non-compliance could result in the termination of the VPK Provider Agreement (AWI VPK-20) and decertification of a VPK program.

Section V

CHILD DOCUMENTS

VPK Child records must include:

1. Child Eligibility and Enrollment Certificate
2. Child Attendance and Parent Choice Certificate Forms

A. Monitoring – Child File Documents

Onsite Monitoring

Onsite monitoring will be unannounced and include review of:

Child File Documents (minimum of 20% children enrolled)

- Child Eligibility and Enrollment Certificate
- Child Attendance and Parent Choice Certificate Forms
- Comparison of teacher attendance, parent sign-in and VPK Enrollment/Attendance Certification Forms

Desk Audit Monitoring

Providers will be notified 5 business days in advance of desk audit monitoring and must submit:

Child File Documents for a minimum of 20% children enrolled. Individual children to be identified by monitor at the time of request.

- Child Eligibility and Enrollment Certificate
- Child Attendance and Parent Choice Certificate Forms
- Comparison of teacher attendance, parent sign-in and VPK Enrollment/Attendance Certification Forms

B. Enforcement – Child File Documents

Failure to meet child file document requirements will result in a corrective action plan which allows 10 business days for the provider to demonstrate compliance. Non-compliances may also result in nonpayment for each day affected by the non-compliance. Repeated non-compliance could result in the termination of the AWI VPK-20.

Section V

PROVIDER POLICIES

Providers are required to distribute a written copy of their policies to the parent or guardian of each child upon enrollment into the VPK program. These policies may not discriminate against a parent or child on the grounds of race, color or national origin according to the [AWI VPK 20](#).

ATTENDANCE POLICY

This policy may address early drop off or late pick up fees, procedures the parent should follow in the event their child is absent and/or allowable absences.

ENROLLMENT POLICY (Optional)

A provider's enrollment policy must not require payment of fees or charges for VPK instructional hours nor may providers require a child to enroll for or require payment of any fees or charges for supplemental services (i.e. wrap care, extended day or full day services) as a condition of admitting a child into the VPK program.

DISCIPLINE POLICY

A provider must have a discipline policy that prohibits children from being subjected to discipline that is severe, humiliating, frightening or associated with food, rest, toileting, spanking or any other form of physical punishment.

A. Monitoring - Provider Policies

Attendance and Enrollment policies may be collected by the Coalition prior to the start of a new program for review. Any policies not reviewed at that time will be requested when the provider receives an on site monitoring and/or a desk audit.

Discipline policies of all licensed facilities must be approved by the Child Care Licensing Board in order to be licensed. Discipline policies of religious license exempt centers will be collected and reviewed by the Coalition prior to the start of a new program.

B. Enforcement – Provider Policies

Failure to comply with state requirements will result in a corrective action plan which allows 10 business days for the provider to demonstrate compliance. Non-compliances may also result in nonpayment for each day affected by the non-compliance. Repeated non-compliance could result in the termination of the AWI VPK-20.