



**Early Learning  
Coalition**  
OF PINELLAS COUNTY

# School Readiness Provider Monitoring Plan

**2018-2019**

**Effective Date: 6/26/19**

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## I. Monitoring Plan Overview

### A. Purpose:

This monitoring plan outlines the implementation of the Coalition's monitoring of School Readiness (SR) providers. It is the goal of the Coalition to provide the necessary technical assistance and resources to support Providers in providing high quality programs and maintaining compliance with the School Readiness Provider Contract and Coalition policies. However, from time to time issues arise which require the Coalition to take enforcement actions to bring providers into compliance.

### B. Background:

The Office of Early Learning (Office) requires that the SR Program Plan a Coalition submits must include a description of the procedures for monitoring SR Program providers, responding to a parental complaint, and ensuring that the standards prescribed in ss. 1002.82, ss. 1002.88, and 6M-9.115, F.A.C are met using a standard monitoring tool adopted by the Office. The Coalition shall more frequently monitor providers it determines high risk based on substantial findings of law violations (*s. 1002.85(2)(h), F.S.*). This does not prohibit a coalition from monitoring a provider more frequently for other concerns such as parental complaints or suspected fraud.

### C. SR Provider Monitoring Plan Elements

#### Tier 1 SR Provider Monitoring

1. Date of certified of School Readiness Contract in accordance with Rule 6M-4.610, FAC.
2. Date of review of DCF exemption determination letter to ensure provider is eligible to provide the SR Programs, if applicable.
3. Date of completion of most recent Health and Safety Inspection in accordance with Rule 6M-4.620, FAC.
4. State Yes or No if a Program Assessment was completed in accordance with Rules 6M-4.740, F.A.C.
5. Date of completion of Quality Improvement Plan Elements (If applicable) in accordance with Rules 6M-4.740, FAC.

6. Conducting Developmental Screenings (if applicable) in accordance with Rule 6M-4.720, FAC.
7. Date of completion of orientation (if applicable) in accordance with Rule 6M-4.610, FAC, OEL-SR20.
8. Date of approval of annual CCR&R Provider Updates in accordance with Rule 6M-9.300(8), FAC.
9. Date of review for completion of monthly enrollment/attendance certifications in accordance with Rule 6M-4.500(2), FAC for the month(s) reviewed for post attendance monitoring.
10. Dates of expiration of liability insurance coverage.

### Tier 2 SR Provider Monitoring

#### Monitoring Tool

- a. The Coalition will use the School Readiness Provider Monitoring Tool, as required by F.A.C 6M 4.630, and prescribed in statute 1002.82.

#### SR Children Sample Size

- a. For Tier 2 monitoring, the coalition will monitor a sample of at least 25% of a SR program provider's SR child files.
- b. When applying the 25% for the sample, round to the nearest whole number.
- c. If the SR program provider has less than 20 SR children, the sample will be four SR child files.
- d. If the SR program provider has four or less SR children, all SR child files will be reviewed.
- e. The sample will be representative of classrooms, billing groups and age of children.
- f. The percentage of SR child files to be reviewed is based on the total number of SR children enrolled with a SR program provider during the month of the monitoring engagement. (For example, if the provider's actual child enrollment count is 65, 16 children should be the sample selected for review.)

### SR Provider Monitoring Schedule

#### Tier 2 SR Provider Monitoring

- a. SR Provider onsite (Tier 2) monitoring will be completed by the Coalition's Provider Contract and Compliance team.

- b. Annual Tier 2 monitoring generally begins in August and ends in April.
- c. The Coalition will select the number of providers to monitor at the beginning of each fiscal year based on OEL's minimum annual sample size.
- d. Once the sample size is determined, the Coalition pulls a random sample of providers in each specialist's assigned caseload taking into consideration provider type and high risk status.
- e. The Coalition will also monitor SR Providers based upon a parent complaint.
- f. Providers monitored based on complaints are removed from the random selection list.
- g. SR Providers determined as high risk as a result of Coalition monitoring will receive at least one (1) additional monitoring during the program year
- h. High risk providers who are identified in the previous year are not captured in the random sample will be added to the list of providers that are sampled for annual monitoring (see High Risk Providers section below).
- i. Any providers who are not monitored onsite will receive a Tier 1 attendance validation desk review, which is conducted by the Provider Reimbursement team.

#### High Risk Providers

- a. All follow up monitoring shall evaluate, at a minimum, the criteria that were found to be non-compliant in the previous monitoring.
- b. For Tier 2 monitoring that evaluates a sample of children's files for compliance, a 10% error rate or higher will be applied to determine if the non-compliance observations will count as a high risk indicator.
- c. All non-compliance observations will still require corrections, regardless of the error rate percentage.
- d. A provider that has eight or more findings as assessed by Tier 2 monitoring will be considered high-risk ( $.25 \times 33 = 8$ ).
- e. Additionally, if 15% or more of the files in the selected sample result in a disallowed cost, that provider will be considered high-risk. (For example, if 3 out of 20 files result in questioned cost, that provider will be considered high-risk.)

#### Tier 1 SR Provider Monitoring

- a. All other providers that have not received a Tier 2 monitoring will receive a Compliance Tracking/Desk Review as documented through the Tier 1 tracking report.

#### Monitoring Results and Corrective Action

- a. The Coalition will notify the SR Provider in writing of any findings to ensure they are given an opportunity to respond and take corrective action.
- b. The written notice will inform the SR Provider of the corrective action steps required with a date to come into compliance.
- c. Based on the violation, the provider may receive financial consequences in accordance with the School Readiness Provider Enforcement Policy- ELCPC-61.2.
- d. If the provider corrects the violation, the Coalition will send written notice to the provider notifying them that the issue was resolved.
- e. If the provider chooses to dispute the noncompliance, they must follow the grievance/due process procedures in accordance with the contract and Coalition policy.
- f. If the provider does not comply with the corrective action requirements, this may result in the provider being placed on probation or having their SR contract terminated.

#### Reports

- a. The Coalition will develop reports of each monitoring that include findings and recommendations to SR providers.
- b. Providers have five (5) business days to correct any findings and submit any requested documentation.
- c. The coalition will respond to the provider's corrective action within three (3) business days.