

# EARLY LEARNING COALITION OF OSCEOLA COUNTY

## VPK PROGRAM MONITORING

ITEM: 510A.03

EFFECTIVE DATE: 4-27-06

REVISED: 08.15.2019, 6.23.2025

Page 1 of 6

---

### **POLICY STATEMENT**

To ensure the VPK program is compliant with legislative and DEL rules and policies, the Coalition will monitor all required program components at least once during each VPK school year and/or summer program, as applicable.

### **PROCEDURE**

1. A targeted sample of private VPK providers offering a school year program will receive an unannounced, on-site monitoring visit during the school year. All VPK classrooms will be subject to monitoring at each VPK provider site using the VPK Program Monitoring Tool to observe the provider's compliance regarding VPK legislation. VPK providers shall also receive technical assistance during this visit as needed.
2. Priorities for selecting VPK providers within the targeted sample to be monitored during the fiscal year include:
  - A. Priority 1 – providers receiving 1 Level I or 2 or more level II DCF infractions within the last year.
  - B. Priority 2 – providers new to the VPK program.
  - C. Priority 3 – providers that per the performance metric designations, failed and under probation, have an incomplete status, or Good Cause Exemption.
  - D. Priority 4 – providers out of compliance during monitoring from previous years.
  - E. Priority 5 – providers receiving parent complaints.
  - F. Priority 6 – providers who have received a post attendance audit by the Coalition who have not been captured in the other six priorities.
3. If the VPK provider is in compliance, a copy of their VPK program monitoring report will be uploaded to EFS-MOD under the Document Library Management for the provider to be able to access and the original will be maintained in the provider's profile.
4. If the VPK provider is non-compliant, the following steps shall be taken:
  - A. The VPK monitoring form shall be checked for accuracy to verify non-compliance.

A review with the VPK director shall be conducted to explain the areas out of compliance and a timeline to comply provided.

    - I. VPK Director without or with expired credential (14 calendar days)
    - II. Teachers without complete supporting documents (14 calendar days)
    - III Teacher(s) in classroom is/are not the same teacher listed on their VPK (14 calendar days)
    - IV. Children in classroom not listed on proper class roster (14 calendar days)
    - V. Different curriculum being used in classroom than listed on VPK-APP (14 calendar days)
    - VI. Failure to notify the Coalition of all VPK program changes as required by the *VPK Statewide Provider Contract* (14 calendar days)
  - B. In cases where improper child ratios and/or health and safety violations are verified, a report will be submitted to DCF, and the infractions will be noted in the provider's profile.
  - C. Follow-up monitoring will be conducted with the provider within the specified timeline to ensure proper compliance.
  - D. If the provider wishes to continue with the VPK program, they will need to provide proof of compliance within the designated timelines or risk termination from the VPK program. If proper compliance is not met within the designated timeline, the Coalition will notify the provider that all payments may be suspended effective immediately. All VPK payments may be suspended from the time of non-compliance discovery until compliance is met. If compliance is not met within the specified time, VPK payments may be deemed disallowed costs and therefore not reimbursable to the provider.

### **1. Administrative Monitoring**

#### **A. Provider Files**

1. A random sample of provider files will be reviewed for each school year and/or summer VPK program to verify that all VPK provider applications are complete and that all required documentation is present in the file. Documentation must include, but not be limited to, a signed and completed VPK application (OEL-VPK 10 and OEL-VPK 11A & 11B), verification of a Director's Credential, verification of staff credentials (CDA, CDAE, etc.) either on the DCF website or copies of completion certificates, proof of active licensure, proof of Gold Seal or other allowable accreditation status, proof of Level II screening for each VPK instructor and/or assistant, affidavit of good moral character for each VPK instructor and/or assistant, proof of completion of an emergent literacy training course approved by the Department of Education or proof of completion of a DCF approved training in early literacy and language development before the

# EARLY LEARNING COALITION OF OSCEOLA COUNTY

## VPK PROGRAM MONITORING

ITEM: 510A.03

EFFECTIVE DATE: 4-27-06

REVISED: 08.15.2019, 6.23.2025

Page 2 of 6

---

establishment of one or more emergent literacy training courses prior to November 28, 2005, documentation of substitute teacher credentials (as applicable), documentation of teacher and/or assistant drop/adds (as applicable), written documentation stating the reason for removing a child from the VPK program in accordance with OEL File# 10.029 (as applicable), and other documentation as required.

- II. The Central Agency will have thirty (30) days from the date of the review to collect missing information for incomplete provider files in order to come into compliance.
- III. Any missing documentation that is unable to be collected due to a provider's refusal and/or non-cooperation must be reported within thirty (30) days to the Coalition for further action to be taken.
- IV. The Coalition's Chief Executive Director or designee will contact any/all non-cooperative VPK Directors either by phone or in writing to request missing information giving them ten (10) days to comply.
- V. If the Coalition Chief Executive Director or designee is unsuccessful in collecting the documentation, the Coalition will notify the VPK Director of the Coalition's intent to terminate the VPK contract and transfer the children accordingly.

### B. Child Files

- I. A random sample of child files will be reviewed for each school year and/or summer VPK program to verify that all documentation is present in the file. Documentation must include, but not be limited to, a signed and completed Parent Application (OEL-VPK 01) 1 form of acceptable proof of residency and 1 form of acceptable proof of the child's age.
- II. The Central Agency will have thirty (30) days from the date of the review to collect missing information for incomplete child files in order to come into compliance.
- III. Any missing documentation that is unable to be collected due to a parent's refusal and/or <https://oelfrs.floridaeearlylearning.com/login.aspx?ReturnUrl=%2f> non-cooperation to collect the document must be reported within the thirty(30) days to the Coalition for further action to be taken.

### C. Parent Files on VPK Provider Premises

- I. A random sample of parent files will be reviewed for each school year and/or summer VPK program to verify that all documentation is complete, including but not limited to, a signed attendance policy by each parent, signed parent certification of parent choice forms verifying child attendance and parent choice for each month of the VPK program, written documentation for absences due to extreme hardships (as applicable), documentation of child transfers (as applicable), and other documentation as required.
- II. The VPK provider will have thirty (30) days from the date of the review to collect missing documentation for incomplete parent files in order to come into compliance.
- III. A thirty (30) day review of the parent files will then be conducted to ensure compliance. If any documentation remains outstanding, the provider will receive a written report of the finding(s) and be given ten (10) additional days to collect the information.

## 2. Financial Monitoring

### A. Attendance Verification

#### I. Attendance Forms Reconciled with Signed Monthly Parent Certification Forms

- a. A random sample of parent files will be reviewed for each school year and/or summer VPK program to document the accuracy of actual attendance sheets submitted against signed parent certification forms to ensure accuracy in reporting and provider payments.
- b. Discrepancies found will be submitted to the Central Agency provider payments department for further research, review and action.
- c. If the provider was in error reporting child attendance, adjustments to the provider's payment will be made to rectify the mistake.
- d. If significant discrepancies are found to be made by a provider regarding attendance reporting/payment and actual signed parent certification forms during the random sample monitoring, a full monitoring will be immediately conducted with that provider.
- e. All discrepancies will then be reported to the Central Agency provider payments department for further review and implementation of adjustments.
- f. If fraud is suspected, the provider will be reported to Office of Early Learning through the Office of Early Learning Fraud Referral System (OEL-FRS) at <https://oelfrs.floridaeearlylearning.com/login.aspx?ReturnUrl=%2f> for further action to be taken.

# EARLY LEARNING COALITION OF OSCEOLA COUNTY

## VPK PROGRAM MONITORING

ITEM: 510A.03

EFFECTIVE DATE: 4-27-06

REVISED: 08.15.2019, 6.23.2025

Page 3 of 6

---

### II. Funding Verification of One Full-time Equivalent Student (FTE) Rate

- a. The Central Agency will print the CC045 Report each month to compare the number of hours utilized by each child and the number of hours claimed on the attendance sheet to ensure that the child does not exceed 540 hours for the school year VPK program or 300 hours for the summer VPK program.
- b. If the hours claimed on the attendance sheet are over the allotted number of allowable hours, the Central Agency will research to see verify that the child is qualified to receive additional hours/funding in accordance s.1002.71(4). F. S.
- c. If the child is not qualified to receive the additional hours/funding, the Central Agency will stop payment for any days that would cause the child to exceed 540 hours or 300 hours, as applicable.
- d. The Central Agency will report any child attendance discrepancies/overages to the Coalition quarterly and the action taken.
- e. The Coalition will review the monitoring process described above during its annual monitoring of the Central Agency.

### VII. Funding Verification for Student Absences

- a. Child attendance is processed each month. After processing the attendance, the data manager generates an impromptu report verifying the cumulative number of absences accrued by each child and sorted by provider.
- b. This report is given to the Central Agency accounts payable department for use in verifying the number of absences allowed for each child for the following month.
- c. If the absences claimed the following month are allowable, the provider is paid for those absences. Once the provider payment process is complete, the impromptu report is generated again for the following month.
- d. If the absences claimed are not allowable, the Central Agency investigates the reasons why the child has exceeded their allowable absences and/or notifies the provider that the child has exceeded their allowable absences.
- e. Once the child has used all their allowable absences, no more absences will be paid to the provider for the remainder of the VPK program for that child.
- f. The Coalition will monitor a random sample of child payments to verify that child absences are not paid beyond the allowed number of hours/percentages of program in accordance with OEL File #510.03.

## 3. Program Monitoring

- I. At least once during a VPK program period (school year and/or summer program) a random sample of VPK providers will be monitored in at least one classroom to ensure adherence to all programmatic requirements using the ~~Monitoring~~ DEL 530.05 – VPK Provider Monitoring Tool.
- II. Those providers found out of compliance will receive technical assistance and/or a corrective action plan to achieve compliance allowing the provider 14 calendar days to send the CAP letter and any document necessary to bring the center back into compliance and if applicable, a follow-up visit will be completed to ensure compliance.
- III. The Program Compliance Coordinator will verify in Renaissance that the administration of the coordinated screening and progress monitoring program were completed within the administration window.

## VPK PROVIDERS ON PROBATION (POP)

Any VPK provider assigned a performance metric designation of *below expectations* or *unsatisfactory* for a program type (schoolyear or summer), must be placed on probation by the Early Learning Coalition. Beginning with performance metric designations assigned in 2024-2025, a provider must remain on probation until it is assigned a performance metric designation of *meets expectations*, *exceeds expectations* or *excellent*, transfers ownership to an individual not associated with the provider as described in Rule 6M-8.301, F.A.C., or completes a period of removal from VPK program eligibility as described in Rule 6M-8.702, F.A.C.

1. The department will provide notification of a provider's probationary status when performance metric designations are published in accordance with subsection 6M-8.622(5), F.A.C.
2. Each year a provider is on probation, the provider must submit an improvement plan to the coalition. A provider's improvement plan must be received by the provider's coalition no later than thirty (30) calendar days after the most recent release of the performance metric designation.
3. An improvement plan, consisting of the three forms listed below must be completed by providers on probation.

# EARLY LEARNING COALITION OF OSCEOLA COUNTY

## VPK PROGRAM MONITORING

ITEM: 510A.03

EFFECTIVE DATE: 4-27-06

REVISED: 08.15.2019, 6.23.2025

Page 4 of 6

---

- a. Form DEL VPK 31A, Voluntary Prekindergarten (VPK) Education Program Improvement Plan: Curriculum. This form requires a provider on probation to select and implement a curriculum from the list of approved curricula for providers on probation in accordance with s. 1002.68(5)(b)3., F.S., In accordance with the guidelines set forth by the State, VPK POPs will be required to provide an acceptable form of proof of purchase (i.e., receipt, bill of sale, invoice, etc.) and to provide information about training staff in the curriculum. The list of approved curricula is available at <https://www.fldoe.org/schools/early-learning/providers/vpk-curriculum.stml>.
  - b. Form DEL VPK 31B, Voluntary Prekindergarten (VPK) Education Program Improvement Plan: Staff Development Plan. This form requires a provider on probation to complete a staff development plan. The list of staff development activities approved by the department for use in improvement plans is available at <https://origin.fldoe.org/schools/early-learning/vpk-accountability.stml>. Each VPK staff member at a provider on probation must complete twenty (20) hours of approved staff development to strengthen instructional practices. Each VPK staff member at a provider on probation operating under a good cause exemption as described in subsection (7) of this rule must complete the staff development outlined in subparagraph (3)(b)1. of this rule and an additional ten (10) hours of approved staff development to strengthen instructional practices.
  - c. Form DEL VPK 31C, Voluntary Prekindergarten (VPK) Education Program Improvement Plan: Communication Plan. This form requires a provider on probation to complete a communication plan that acknowledges that the provider will notify families of its performance metric designation and the requirement to implement an improvement plan. Notification must be in writing and provided to families no later than fourteen (14) calendar days after receipt of coalition approval of the plan or child's enrollment, whichever occurs later.
4. VPK POPs can request technical assistance from ELC authorized staff to support them in successfully implementing the curriculum package they choose to use for their VPK program. 5. Once an improvement plan has been submitted, the Coalition has thirty (30) calendar days to review and approve or reject the plan. If the Coalition does not approve the provider's VPK Improvement Plan, the coalition must:
- a. Update the status of the provider's improvement plan to pending,
  - b. Return the improvement plan to the provider with required revisions, and
  - c. Offer to assist the provider with revising the improvement plan.
- The provider will have fourteen (14) calendar days to re-submit a plan for consideration.
5. If a VPK POP does not complete their VPK Program Improvement Plan by the fourteenth (14) calendar days, the coalition must implement the noncompliance determination and corrective action notice requirements described in Form DEL-VPK 20. Failure to implement corrective action is grounds for termination for cause of the provider's contract
6. If the Coalition terminates POP's *VPK Statewide Provider Contract* for non-compliance, the Coalition shall ensure that:
- a. Parents are given adequate notification of the provider's non-compliance and termination from the VPK program;
  - b. Parents are given a list of VPK providers who are currently accepting children into the VPK program for the Coalition's service area;
  - c. Providers are given ten (10) day notice of intent to terminate the *Statewide Provider Contract* as outlined in # 55 (a)(b) of DEL-VPK 20 Form.
7. Following improvement plan approval, a provider must implement its approved plan and submit evidence of implementation to the coalition using the forms DEL VPK 31A, 31B, 31C, 33, and 34. Evidence for implementation of the improvement plan must be received by the timelines established by the department.
8. If a coalition does not receive evidence of implementation of the improvement plan by the timelines established by the department, 30 calendar days, the coalition must implement the noncompliance determination and corrective action notice requirements described in Form DEL-VPK 20, *Statewide Voluntary Prekindergarten Provider Contract*, Paragraph XI. Failure to implement corrective action is grounds for termination for cause of the provider's contract.
9. An incomplete provider must complete a technical assistance plan to strengthen administrative or instructional practices utilizing Form DEL VPK 32, Voluntary Prekindergarten (VPK) Education Program Technical Assistance Plan for Incomplete Providers. This form requires an incomplete provider to identify causes of their incomplete status and strategies to address these causes.
10. If for three (3) consecutive years, a provider receives a performance metric designation of below expectations, unsatisfactory or a combination of these performance metric designations, the provider must apply for and be granted a good cause exemption by the department before it can offer VPK instruction for the same program type.

# EARLY LEARNING COALITION OF OSCEOLA COUNTY

## VPK PROGRAM MONITORING

ITEM: 510A.03

EFFECTIVE DATE: 4-27-06

REVISED: 08.15.2019, 6.23.2025

Page 5 of 6

---

- A. A provider is not eligible for a good cause exemption if it has been cited for any Class I violations or two (2) or more Class II violations, as defined by paragraphs 65C-22.010(1)(e) and 65C-20.012(1)(h), F.A.C., or local licensing agency (LLA) in the two-year period prior to the date the provider's good cause exemption application is received by the department.
- B. To be eligible for a good cause exemption, a provider must have met all the following criteria:
1. Child demographic data from the most recent program year that evidences the provider served:
    - a. A statistically significant population of children with limited English proficiency as defined in s. 1003.56, F.S.,
    - b. A statistically significant population of children with disabilities as defined in s. 1002.51(2), F.S., who have individual educational plans or disabilities documented by a licensed health, mental health, education or social service professional other than the child's parent or person employed by the provider, or
    - c. A statistically significant population of a combination of a.–b. above.
  2. Data from the private prekindergarten provider or public school which documents improvement in at least two of the three components in the most recent program year when compared to the previous program year:
    - a. Achievement of the children served, as measured by the coordinated screening and progress monitoring program in accordance with s. 1008.25(9), F.S., and calculated in accordance with paragraph 6M-8.622(3)(b), F.A.C.;
    - b. Learning gains of the children served, as measured by:
      - (I) The coordinated screening and progress monitoring program in accordance with s. 1008.25(9), F.S., and calculated in accordance with paragraph 6M-8.622(3)(c), F.A.C.; or
      - (II) An alternative measure that has comparable validity and reliability of the coordinated screening and progress monitoring program in accordance with s. 1008.25(9), F.S.; or
      - (III) Documented progress towards meeting the goals outlined in a child's individual educational plan in accordance with s. 1002.68(6)(c)1., F.S.
    - c. Effective teaching practices as measured by improvement in the provider's composite program assessment score as calculated in accordance with paragraph 6M-8.621(1)(b), F.A.C.;
  3. Data from the early learning coalition or district school board, as applicable, the Department of Children and Families, or an accrediting association, demonstrating the provider's compliance with state and local health and safety standards in accordance with s. 1002.68(6)(b)3., F.S., during the most recent program year; and
  4. Coalition certification of provider compliance with VPK contract deliverables during the most recent program year.
  5. Good Cause Exemption Application Process.

A VPK provider seeking an exemption must submit its good cause exemption application to the department on Form DEL-VPK 33, Voluntary Prekindergarten (VPK) Education Program Application for Good Cause Exemption via email to [vpkcompliance@del.fldoe.org](mailto:vpkcompliance@del.fldoe.org).
  6. A VPK provider's complete good cause exemption application, including all data and documentation required by paragraph (7)(b) of this rule must be received by the department no later than fourteen (14) calendar days after the most recent release of the performance metric designation. The department will not accept untimely or incomplete good cause exemption applications.
  7. The department will notify the provider and coalition of the provider's good cause exemption approval or denial by no later than thirty (30) calendar days of receipt of the provider's good cause exemption application.

A good cause exemption is valid for one (1) program year, and the provider must apply annually to request an exemption. A provider granted a good cause exemption must continue to meet improvement plan requirements found in subsections (3)-(5) of this rule.

Pursuant to s. 1002.68(5)(d), F.S., if a provider is not granted a good cause exemption, the coalition must revoke the provider's eligibility to deliver the VPK program.

# EARLY LEARNING COALITION OF OSCEOLA COUNTY

## VPK PROGRAM MONITORING

ITEM: 510A.03

EFFECTIVE DATE: 4-27-06

REVISED: 08.15.2019, 6.23.2025

Page 6 of 6

---

8. Under Rule 6M-8.622, Florida Administrative Code, and Section 1002.68, Florida Statutes, the Florida Department of Education has established a performance metric system to evaluate VPK providers. This system assesses providers based on three components, each contributing to a composite score that determines the provider's performance designation.

A. Eligibility: Providers must have at least four eligible children, defined as those who have completed more than 50% of the total instructional hours in the VPK program at the same provider.

B. Performance Metric Components

Quality (50%)

Composite Program Assessment Score, derived from the average of all program assessment dimension scores from VPK classrooms, excluding the negative climate score. Providers can earn up to 50 points in this category.

Learning Gains (30%)

Assessed through the growth rate in children's literacy skills, calculated by the difference between progress monitoring assessments (PM1 and PM3) using the FAST Star Early Literacy tool.

Achievement (20%)

Percentage of eligible children who achieve a USS of 707 or higher on PM3, indicating kindergarten readiness.

C. Performance Designations

Based on the total composite score (maximum of 100 points), providers receive one of the following designations:

- Excellent
- Above Expectations
- Meets Expectations
- Below Expectation
- Unsatisfactory

Providers with designations of "Below Expectations" or "Unsatisfactory" are considered to have not successfully implemented the VPK program and are required to undertake corrective actions, which may include developing an improvement plan and using an approved curriculum.

---

## PARTIES AFFECTED

VPK providers, VPK children and their parents

## ASSOCIATED DOCUMENTS / FORMS

Provider's VPK-APP, VPK Forms 31A, 31B, 31C & DEL-VPK 20