



BOARD REGULAR MEETING MINUTES

May 24, 2018

CareerSource Research Coast
584 University Blvd., Port St. Lucie, FL

Present: Brandon Tucker
Barbara Clowdus
Shonda Hunter (phone)
William Laughlin
Pat McCoy (phone)
Steve Newman (phone)

Richard Reilly
Donna Rivett
Ann Rodriguez
Natalie Sanders (phone)
Julie Zobec (phone)

Excused: Michelle Akins
Sandy Akre
Rhiannon Forker
Linda Halpin

Miranda Hawker
Karlette Peck
Joy Yates

Staff: Migdalia Rosado
Zack Hackley (phone)
Carla Herron

Pat Houston
Loretta Toth

I. CALL TO ORDER

The meeting was called to order by Chair, Brandon Tucker, at 1:35 p.m. Roll call was taken and a quorum was present.

II. ANNOUNCEMENTS AND ADDITIONS/DELETIONS TO AGENDA

Note for file: Linda Halpin was appointed as the DCF representative.

III. ADOPTION OF AGENDA

Motion to adopt the agenda was made by Donna Rivett, seconded by Ann Rodriguez and passed.

IV. CONSENT AGENDA

- A. Board Regular Meeting Minutes – March 22, 2018
- B. Plan Amendment II – Implementation, F. – Sliding Fee Scale

Motion to adopt the consent agenda was made by Ann Rodriguez, seconded by Donna Rivett and passed.

V. INTERIM CEO's REPORT

Ms. Rosado introduced the new Family Services Manager, Carla Herron. Ms. Rosado reported that ELCIRMO is enrolling in all three counties. There will be funds remaining at year end.

Ms. Rosado reported on Class 1 violations in House Bill 7055 and the impact on providers. Coalitions have been asked to develop a policy regarding how they will deal with violations by providers, noting that contract termination or revoking eligibility up to five years is an option. The bill will go into effect July 1. The Association of Early Learning Coalitions has discussed having a consistent policy among all ELC's.

Pat McCoy joined via phone at 1:40 p.m.

Ms. Rosado explained that should ELCIRMO decide not to contract with a provider that has a Class 1 violation, the provider may exercise their right to due process and they can appeal.

After further discussion, the Board decided to wait until Rule is released by the state. In the meantime, the Program Committee will review further.

A component of House Bill 1091 will give coalitions local control to determine enrollment priorities, effective July 1. However, until guidance is received by the state, everything will stay as is.

FLKRS (Florida Kindergarten Readiness Scores) have been released, with more than 50% of scores below the allowable threshold statewide. There were 52% of ELCIRMO's providers that did not meet the threshold. A new tool was used this year requiring a child to use a computer and mouse, which is considered developmentally inappropriate. The Board was advised that there will most likely be a lot of media on this matter.

VI. OLD BUSINESS

A. CEO Search Update – Ms. Zobec reported that the Bylaws/Personnel Committee has been reviewing all resumes and will meet next week to prepare the short list of candidates, which will be presented for review to the Executive Committee's June 5th meeting. Interviews are tentatively scheduled for June 12th and 13th. The Board will approve their selection at the June 28th board meeting.

VII. NEW BUSINESS

A. Action Item 2017-18.05-1 – Proposal for Auditing Services

The Finance Committee reviewed all proposals and recommended Moss, Krusick & Associates.

Motion was made by Donna Rivett to appoint Moss, Krusick & Associates as auditors for the 3-year period of July 1, 2018 through June 30, 2020. Motion was seconded by Ann Rodriguez and passed unanimously.

B. Action Item 2017-18.06-1 – Slate of Officers for 2018-2019

Mr. Tucker reviewed the recommended slate of officers for 2018-19 as presented. There were no objections and no nominations from the floor. The slate will be presented at the June board meeting for the official vote.

Motion was made by Richard Reilly to approve the slate of officers for 2018-2019 as presented, to be submitted to the June Board meeting for the official vote. Motion was seconded by Ann Rodriguez and passed unanimously.

C. Action Item 2017-18.07-1 – Dental Benefits Renewal 2018-2019 - The proposal represents no change in premium over the current year.

Motion was made by Donna Rivett to accept the recommended proposal with Florida Combined Life at a cost of \$12.72 per employee per month, 100% employer-funded. Motion was seconded by Richard Reilly and passed unanimously.

D. Action Item 2017-18.08-1 – Medical Benefits Renewal 2018-2019 – The renewal plan was offered at a 12.11% increase. The Finance Committee recommended renewal of the BlueCare Plan 14256 and permit the option of a “buy-up” plan, Blue Options Plan 14006.

Motion was made by Will Laughlin to accept the recommended proposal submitted for the BlueCare Plan 14256 paid by the coalition at 100% and allow employees the option to choose Blue Options Plan 14006, with the difference in cost to be paid by the employee through payroll deduction. Motion was seconded by Ann Rodriguez. Discussion: In addition, the Finance

Committee has recommended that the Bylaws/Personnel Committee review alternative brokers and plans for future years. Motion passed unanimously.

- E. Action Item 2017-18.09-1 – Proposed Budget for 2018-2019** – The budget was presented to the Finance Committee and recommended for approval.

Motion was made by Donna Rivett to accept the budget for 2018-2019 as presented. Motion was seconded by Ann Rodriguez and passed unanimously.

- F. Action Item 2017-18-10 – Meeting Schedule for 2018-2019**

Motion was made by Ann Rodriguez to approve the meeting schedule as presented. Motion was seconded by Richard Reilly and passed unanimously.

- G. Action Item 2017-18.11 – PTO Payout** – A 40-hour PTO payout was requested for two employees, as stated in the Employee Personnel Handbook.

Motion was made by Richard Reilly to approve the PTO payout for two employees. Motion was seconded by Donna Rivett and passed unanimously.

In response to Mr. Newman's question regarding the financial impact, it was noted that the financial impact is roughly \$2,700 and has been budgeted. It was recommended that the PTO policy be reviewed by the Bylaws/Personnel Committee.

VIII. COMMITTEE REPORTS

- A. Finance Committee Report** – Ms. Rodriguez reported the financial reports were reviewed by the Finance Committee and were included in the packet.

A draft letter to legislators was included in the packet. Mr. Newman explained the reason for the letter as it relates to House Bill 1091. The letter will be sent to the legislators on behalf of the board.

An article, "*Beyond Financial Oversight: Expanding the Board's Role in the Pursuit of Sustainability*" was shared for information purposes.

Ms. Rodriguez reported on the excess funds that will be available at year end and asked for the Board's recommendation on the use of those funds. Mr. Hackley reported that all percentages for quality, direct and non-direct services are being met and enrollment is taking place in all three counties. In addition, funds have been expended for provider stipends and supplies. Due to staff positions not being replaced during the 16 months of merger discussions, there remains approximately \$200,000 in the salary line item. Mr. Tucker questioned which positions had been frozen. Ms. Rosado replied that she was filling a dual role as Director of Operations and Interim CEO and the position of Director of Family Services was not filled, with some of those duties being assumed by the Family Services Manager. Acknowledging that staff should be compensated for continuing to do a fantastic job during a difficult, stressful time, he requested a proposal for staff bonuses be presented to the June 5th Executive Committee meeting and then voted on by the full board.

- B. Bylaws Committee Report** – Ms. Zobec reported on the status of the CEO search. In addition to what was reported above, she commented that the Executive Committee has invited the members of the Bylaws/Personnel Committee to attend the interviews as observers. All candidates will receive the same questions, which allows for follow-up based on their responses. The questions, rating matrix, and interview rating sheet were all revised by the Committee. Mr. Tucker thanked the Committee for their thoroughness.

- C. Executive Committee Report** – Mr. Tucker informed the members that he has told the Governor's Office that he will step down as Chairman as soon as a new appointment is made. He will continue to act as chair, however, if no appointment is made by the end of the calendar

year, he may consider stepping down entirely. At that time, Will Laughlin, Vice-Chair, will assume the role of acting chair, until a chair is appointed by the Governor.

D. Program Committee Report – Ms. Clowdus reported that the Committee will continue to pursue transportation for children in Okeechobee, while also focusing on funding for wrap-around care. Ms. McCoy reported that the Okeechobee School District has children registered for their VPK program for next year. House Bill 1091, which defines quality, will impact coalitions, and ELCIRMO will require more staffing to accommodate additional requirements.

E. Fundraising Committee Report – Touch-a-Truck was a great event again this year. The board agreed to continue with the event for 2019. Items for consideration for future events are to advertise “cash only”, have someone stationed at the front gate to accept admissions, consider utilizing a mobile credit card acceptance for the day (debit/credit), no lollipops, more learning experiences, a horn-free zone, and more ELC signs. In addition, ELCIRMO should have a table set up with information on the “Talk with Me Baby” program, allowing ELCIRMO staff to inform parents on the subject while children explore through a maze.

IX. CHAIRMAN’S COMMENTS – No further comments.

X. BOARD MEMBER COMMENTS – No comments.

XI. PUBLIC COMMENTS - None

XII. INFORMATION – The following items were included in the packet for information purposes only.

- A. Children Served/Wait List
- B. CSCMC/ELC Match Mid-Year Performance Review 2017-18
- C. Board member vacancies – information available on website.

XIII. ADJOURNMENT - The meeting was adjourned at 3:05 p.m. on a motion by Donna Rivett, seconded by Ann Rodriguez.

Respectfully submitted,

Brandon Tucker, Chair
BT:lt



Crisis Communications Plan

Early Learning Coalition of Indian River,
Martin and Okeechobee Counties, Inc.
(772) 220-1220
Fax: (772) 223-3868
10 S.E. Central Parkway, Suite 200
Stuart, FL 34994
www.ELCIRMO.org

Table of Contents

Topic

Definition of Crisis	3
Crisis Management Plan	3-5
Holding Statement Protocol	5
Media Policy	6
Media Trainings	6
Receipt of Crisis Communications Plan	7

DRAFT

Definition of Crisis

For the purposes of this Crisis Communications Plan, a crisis is defined as any event, series of events, or circumstances that have the potential to negatively impact the Early Learning Coalition of Indian River, Martin and Okeechobee Counties, Inc. (ELCIRMO). This event or circumstance may precipitate from actions by Coalition board members and/or Coalition staff, Contracted School Readiness/Voluntary Pre-Kindergarten Providers or it may be related to actions beyond the control or forethought of any individual associated with the Early Learning Coalition of Indian River, Martin and Okeechobee Counties.

With this definition in mind, the goal of this plan is to coordinate a responsible and thoughtful public response to any and all crises for the benefit of all of Indian River, Martin and Okeechobee County residents.

Crisis Management Plan

In the event of a crisis, it is the procedure of the Early Learning Coalition of Indian River, Martin and Okeechobee Counties to complete the following steps by the approved persons:

1. Stabilize any current crisis. That is, any unsafe situation or emergency medical care must be handled appropriately and thoroughly as a priority.

Call 911 and notify police and/or fire rescue first, *then* alert at least one member of the crisis management team.

2. Notify crisis management team. This team consists of:
 - a. Coalition Board Chair
 - b. Coalition Attorney
 - c. Chief Executive Officer
 - d. Director of Operations
 - e. Director of Provider Services
 - f. Director of Finance

Contact information is available on the Coalition shared folder, as well as in a binder in the ELCIRMO administrative office. This contact information will be updated at least once a year, after the Annual Meeting. **It is the primary responsibility of the Chief Executive Officer and/or Designee to ensure that each** member of the crisis management team is contacted in the event of a crisis and a meeting is scheduled immediately in person or by conference call.

Overseen in most cases by the Chief Executive Officer, the crisis management team will assess the situation, delegate responsibilities and implement the crisis response procedures as outlined in this document. They will also be responsible for evaluating available and needed resources in response to the crisis.

Immediately, the crisis management team will also determine the proper spokesperson. There is to be ONE spokesperson to the media during the entire length of the crisis. This is without exception. The majority of the time the spokesperson will be the Chief Executive Officer.

The team shall also determine an immediate "holding statement" (see page 5); this statement will be available in case the media calls with questions. Ensure the spokesperson is comfortable with the statement, and that it focuses on the positive impact of the Coalition. Do not issue the statement unless there are media inquiries.

3. Determine legal implications. Discuss crisis if appropriate with the Coalition Attorney and heed legal advice if needed. Ensure the Coalition Attorney is comfortable with the statement as prepared.
4. Alert the staff AND all Board members. An email or other correspondence will be sent to all employees of the Early Learning Coalition of Indian River, Martin and Okeechobee Counties and all board members outlining the following:
 - a. Explain the crisis.
 - b. Alert them to the spokesperson authorized to speak to the media.
 - c. Remind the staff and Board members of the importance of one designated public spokesperson.

If approached by the media, acceptable responses include:

"The spokesperson for the Early Learning Coalition of Indian River, Martin and Okeechobee Counties is CEO _____. He/she can be reached at (772) 220-1220 ext. _____. He/she will be able to best answer any questions you may have."

or:

"If you please give me the name of your organization and your phone number, I will have someone get back to you as quickly as possible to answer your questions." Then pass the message along to the Chief Executive Officer and/or Designee.

- d. Alert both staff and Board members to the response plan.
5. Contact the Office of Early Learning. Contact information is available on the Coalition shared folder, as well as in a binder in the ELCIRMO administrative office.
6. Contact Funding Agency representatives, if necessary. To reduce misinformation, it is best to communicate directly with Funding agency representatives and other stakeholders as deemed appropriate. Provide talking points and the holding statement. This can be done through an email blast by the determined spokesperson/Chief Executive Officer or Designee. If needed, schedule an informal meeting after the crisis fades to discuss the issue.

7. Provide fact sheets to public and update Web site, if necessary. The idea here is to utilize all opportunities possible to get our message to the public. Focus on the long-term, positive impact of the Coalition.
8. Return to normal operations as soon as possible. Remember to put the mission first.
9. Learn from the situation. The crisis management team will meet as soon as feasible after the crisis to determine ways to prevent future situations and critique the crisis plan. The team shall update the crisis management plan as needed.

Holding Statement Protocol

The holding statement, as developed by the crisis management team and reviewed by legal counsel, will vary with each situation but should contain the following:

Date

Paragraph 1: Briefly state the situation and the Coalition's concerns.

Allegations of misconduct by an employee have been reported to the Early Learning Coalition of Indian River, Martin and Okeechobee Counties. The organization is deeply concerned about these allegations and is cooperating fully with local law enforcement authorities in a thorough investigation of this case.

Paragraph 2: State any relevant action the Coalition has taken.

Pending the conclusion of the investigation, the employee has been suspended without pay and is barred from any access to Coalitions' facilities and funded programs.

Paragraph 3: State the Coalition's strong position of care and concern for children.

The Early Learning Coalition of Indian River, Martin and Okeechobee Counties has as its primary concern the children of Indian River, Martin and Okeechobee Counties and enabling them to attain their full potential. The organization does not tolerate illegal or inappropriate activity or behavior on the part of any staff member or volunteer.

Paragraph 4: Summarize: No further comment until investigation concludes .

The organization will withhold further comment on this case until the investigation is completed and the case is resolved.

Contact: Provide contact name and phone number for the determined spokesperson.

Media Policy

The following is the media policy of the *Early Learning Coalition of Indian River, Martin and Okeechobee Counties*, whether within a crisis or not:

- a. All media inquiries will be shared with the Chief Executive Officer and Crisis Management Team.
- b. Prompt and accurate information will be delivered by the most appropriate and knowledgeable spokesperson for the Coalition as determined by the Chief Executive Officer and/or Designee.
- c. We reserve the right not to respond to a media request. We will not force any staff member, Coalition member or Provider representative to conduct an interview. We respect the right of individuals to say "no" to an interview request.
- d. The Chief Executive Officer and/or Designee will brief all involved in media interviews.
- e. We will not provide "off the record" information, and we respect the right to privacy at all times.
- f. We NEVER use the phrase "no comment" in response to a question from the news media.
- g. All interviews and coverage will be logged and preserved. Whenever possible, information about coverage will be distributed to the Chief Executive Officer and the crisis management team.

Media Trainings

Trainings shall be administered by the Chief Executive Officer and/or Designee for the benefit of Coalition staff, board members and representatives of Funding agencies, as needed.

Coalition staff will be encouraged to participate in training as necessary. Each employee shall sign the Receipt of Crisis Communications Plan, and a copy will be kept in the employee's personnel file.

Coalition board members will also receive a copy of this Crisis Communications Plan.



Receipt of Crisis Communications Plan

_____ have received a copy of the Early Learning Coalition of Indian River, Martin and Okeechobee Counties Crisis Communications Plan.

I understand my role in regard to any potential future crisis. Unless otherwise instructed, I will direct all media inquiries to the Chief Executive Officer or Designee.

If I have any questions regarding the Crisis Communications Plan, I will contact the Chief Executive Officer or Designee.

Signed: _____

Date: _____



Early Learning Coalition
Of Indian River, Martin and Okeechobee Counties, Inc.

Early Learning Coalition of Indian River, Martin, and Okeechobee Counties, Inc.

Coalition Anti-Fraud Plan

Board Approved –

Table of Contents

Purpose:	3
<i>Definitions:</i>	3
Organizational Structure:.....	4
Procedures for Detecting and Investigating:	4
<i>Detecting for Recipients:</i>	4
<i>Investigating for Recipients:</i>	4
<i>Detecting for Providers:</i>	5
<i>Investigating for Providers:</i>	5
Mandatory Reporting:	6
Education and Training of Personnel:	7
Due Process for Recipients:.....	7
Right to Appeal:	7
Pre-Appeal Process with the <i>Coalition Staff:</i>	7
Appeal Process with the Chief <i>Executive Officer:</i>	8
Appeal Process with an Appeals <i>Committee:</i>	8
Due Process for Providers:	9
Repayment Process:	9

In the normal course of their work, Early Learning managers, supervisors, team members and partners may become aware of instances of actual, potential, or suspected fraud and abuse in the operation of any program funded by State or Federal funds administered through the Office of Early Learning (OEL). Included in this category are instances of actual, potential, or suspected fraud and abuse in the operation of programs administered by grantees, contractors and partners.

Purpose:

The purpose of the Early Learning Coalition Anti-Fraud Plan is for the detection and investigation of possible acts of fraud, abuse or overpayments by recipient's and contracted providers relating to the provision of and payment for School Readiness and Voluntary Prekindergarten Programs. To establish the procedures for reporting allegations of possible fraud, misfeasance, misapplication of funds, gross mismanagement and employee/participant misconduct in the Early Learning Programs. (School Readiness and Voluntary Pre-Kindergarten)

Definitions:

Fraud, Misfeasance, Nonfeasance, or Malfeasance: In the operation of any program funded by State or Federal funds administered by the Florida's Office of Early Learning, actions which constitute the omission of an act a person ought to do, the improper performance of an act a person might lawfully do, or the performance of an act a person ought not to do. This category includes, but is not limited to, indications of bribery, forgery, extortion, embezzlement, theft of participant checks, kickbacks from participants, and intentional payments to a contractor without the expectation of receiving services.

Misapplication of Funds: Misapplication of funds should be considered as any alleged use of funds, assets or property not authorized or provided for in the grant or contract. This category includes, but is not limited to, nepotism, political patronage, use of participants for political activities, ineligible enrollees, conflict of interest, not reporting income from Federal funds, violation of contract procedures, maintenance of effort violations, and the use of funds for other than their designated purposes.

Gross Mismanagement: Actions or situations arising out of the intentional failure to perform one's duties or responsibilities in reckless disregard of the consequences, which lead to major violations of contract provisions and/or which severely hamper the Agency's ability to fulfill its mission.

Employee/Participant Misconduct: Employee/participant misconduct should be considered as occupational or professional actions occurring during or outside work hours, that reflect negatively on Agency or its mission, and may include, but are not limited to, conflict of interest or the appearance of conflict of interest involving outside employment business and professional activities; the receipt or giving of gifts, fees, entertainment, and favors; misuse of Federal/State property; misuse of official information; and such other activities as might adversely affect the confidence of the public in the integrity of the Government as well as serious violations of Federal and State laws.

Organizational Structure:

The organization is composed of four major departments; Administration, Family Services, Finance, and Programs. Each department has defined functions that are essential to the support and performance of critical mission operations for the organization.

Primary coalition position responsible for implementing the Early Learning Coalition's Anti-Fraud Plan is the Interim CEO, Migdalia G. Rosado who can be contacted via email at mrosado@elcirno.org or via phone at 772-223-3861. Other individuals involved in the process include the Lead Reimbursement Data Specialist, Family Services Manager and respective Department Directors.

Procedures for Detecting and Investigating:

Detecting for Recipients:

The following are some of the methods that will be utilized in detecting potential fraud, abuse and overpayments, which includes but is not limited to:

1. Review of data quality reports generated by OEL
2. Documented verification of child care referrals from other organizations
3. Authenticity, i.e., altered documents or fake ID
4. Signatures on employment or residency verification forms
5. Inconsistencies from previously reported information on employment or residency verifications forms, i.e., phone numbers, name of individuals, etc.
6. Marital status and dependents indicated on paystubs
7. Inconsistencies on family composition from previously reported information
8. Anonymous calls received by the organization regarding client receiving services
9. Providers reporting information that is inconsistent with information reported by client
10. Other sources that become available to the Coalition during the course of normal business processes, i.e., Equifax Verification Services.

Investigating for Recipients:

1. The internal process will be initiated by the completion of a potential fraud review form indicating what item or items above triggered a review.
2. During this process the recipient's services will not be terminated or suspended.

3. The first reviewer will have 15 days from receipt of potential fraud review form to make a determination as to whether or not potential fraud and an overpayment occurred due to ineligibility.
4. The review process will consist of an extensive review of electronic files, attendance and reimbursement reports and any other documents necessary to make a determination of continued eligibility as well as to determine if an overpayment was made.
5. Once the first reviewer has made a determination, this will be noted on the same form in the area indicated for the reviewer to complete.
6. If an overpayment is determined, the Improper Payment Adjustment form will be completed and attached.
7. The second review will be conducted by the Family Services Director for a final determination within 15 days of receipt.
8. If final determination indicates potential abuse, fraud or overpayment, the recipient will be sent written notification and provided with a pre-appeals process.
9. Each step of the process must be documented to include all supporting documentation, recommended actions as well as actions taken.

Detecting for Providers:

The following are some of the methods that will be utilized in detecting potential fraud, abuse and overpayments, which includes but is not limited to:

1. Review of attendance sheets and compared to sign-in/sign-out sheets
2. Providers with consistently perfect attendance sheets
3. The sign-in/sign-out sheets shows the same parent's signature, but the handwriting is not the same.
4. The time recorded on sign-in/sign-out form is always the same.
5. Unannounced visits for attendance monitoring
6. Parental complaints/allegations against a provider
7. Anonymous calls received by the organization regarding providers
8. Other sources that become available to the Coalition during the course of normal business processes

Investigating for Providers:

1. The internal process will be initiated by the completion of a potential fraud review form indicating what item or items above triggered a review.

2. During this process no action will be taken against the provider until due process procedures as outlined within the contract between the coalition and the provider are initiated via written notification.
3. The first reviewer will have 15 days from receipt of the potential fraud review form to make a determination as to whether or not potential fraud and an overpayment occurred due to inconsistencies in documentation.
4. The review process will consist of an extensive review of electronic files, attendance and reimbursement reports and any other documents necessary to make a determination of continued eligibility as well as to determine if an overpayment was made.
5. Once the first reviewer has made a determination, this will be noted on the same form in the area indicated for the reviewer to complete.
6. The second review will be conducted by the Finance Director for a final determination within 15 days of receipt.
7. If an overpayment is determined, the Improper Payment Adjustment form will be completed and attached.
8. If final determination indicates potential abuse, fraud or overpayment, the provider will be sent written notification and provided with the due process procedures as outlined within the contract between the coalition and the provider.
9. Each step of the process must be documented to include all supporting documentation, recommended actions as well as actions taken.

Mandatory Reporting:

The Inspector General of OEL is designated the coordinator of all suspected fraud referrals to the Department of Financial Services, Division of Public Assistance Fraud. Early Learning Partners are responsible for immediately reporting all such actual or suspected violations they or their supervisors and employees uncover to the OEL Office of Inspector General, the Department of Financial Services, Division of Public Assistance Fraud and the Florida's Office of Early Learning (OEL).

1. The coalition administrator, Migdalia Rosado, for the Office of Early Learning Fraud Referral System, will be notified immediately upon the initiation of an internal review process for a potential fraud, abuse or an overpayment.
2. On a monthly basis report to OEL electronically the number of recipients and providers terminated for fraud.
3. The coalition administrator will submit all potential fraud, abuse and overpayment to OEL utilizing the on-line OEL Fraud Referral System upon completion of the internal review process while simultaneously informing the recipient and/or provider of their right to an appeal.
4. Further information on reporting suspected fraud may be obtained by calling the Office of Inspector General at (850) 717-8605.

Education and Training of Personnel:

1. All staff regardless of position held within the organization will be trained on the importance of being attentive to areas where there is a potential for abuse, fraud and overpayment.
2. Each department manager, where applicable and department director will be responsible for providing training to their respective staff in utilizing the methods identified above for recipients and providers on detecting and preventing fraud, abuse and overpayment.
3. The training will include how to calculate overpayments and completing the appropriate forms.
4. Education and training will be ongoing as any issues identified during the internal review process of potential abuse, fraud and overpayment will be utilized as learning tools with the respective department and the agency as a whole.
5. On an annual basis the coalition will conduct a self-assessment of internal controls, policies and procedures and make any necessary changes, as appropriate.

Due Process for Recipients:

Right to Appeal:

1. Recipients have the right to appeal a suspension or termination of benefits based on information that has lead the coalition to conclude that School Readiness or Voluntary Prekindergarten Education program benefits have been obtained or used fraudulently.
2. Recipients and Providers who fail to file a timely appeal waive their right to appeal.

Pre-Appeal Process with the *Coalition Staff*:

1. A written advance notice of the intended action to suspend or terminate benefits shall be provided to the recipient clearly advising of the allegations, the basis of the allegations, the intended action and the date action is to be imposed.
2. Recipients with a valid at-risk referral shall not have their services suspended or terminated. These will be addressed on a case-by-case basis with OEL's Office of Inspector General for direction.
3. The written notice shall be sent at least fourteen (14) calendar days before the intended action, via certified mail/return receipt requested and regular mail. If previous communication with the recipient have been translated, the written advance notice shall also be translated into the recipient's native language.
4. The written advance notice shall include the following for a pre-appeal process:
 - a. Informing recipient that they have ten (10) calendar days to file a written pre-appeal which should fully describe the nature of the error the recipient believes has been made and shall contain any documentation which support the recipient's claim.

- b. Notification of the potential for repayment of improper benefits if the conclusion of appeal fraud is upheld, including any benefits received after the receipt of the written advance notice.
 - c. The right to request a copy of his or her file.
 - d. If applicable, the amount of overpayment to be recovered.
 - e. Length of suspension of benefits or date of termination of benefits, if applicable. The length of time shall be proportionate to the alleged offense committed, consistent with suspensions or terminations issued to other recipients who allegedly committed comparable offenses, and may also consider prior offenses, as appropriate.
 - f. A recipient who fails to file a timely pre-appeal waives the right of appeal.
5. The Chief Executive Officer of the Coalition shall not be involved in the pre-appeal process.
 6. Recipients that believe that a pre-appeal process did not resolve the issue may file a formal written appeal for review by the Chief Executive Officer as outlined in #3 below.

Appeal Process with the *Chief Executive Officer*:

1. Submit a written appeal to the Chief Executive Officer or other executive staff person as designated by the coalition board.
2. The appeal must fully describe the nature of the error the recipient believes has been made and shall contain any documentation which supports the recipient's claim.
3. The appeal shall be postmarked or emailed before the date of the intended action. The recipient who fails to file a timely appeal waives the right of appeal.
4. If the recipient files a timely appeal, he or she will not have services suspended or terminated until written decision of the Chief Executive Officer or the original date of the intended action, whichever is later.
5. The Chief Executive Officer of the coalition or other executive staff person designated by the coalition board must respond to the recipient, in writing, within thirty (30) days of receiving the appeal with a decision as to whether the suspension or termination will be upheld or modified.
6. Recipients who wish to appeal the decision of the Chief Executive Officer of the coalition or other executive staff person designated by the coalition board may request further review by an appeals committee as outlined in #4 below.

Appeal Process with an Appeals *Committee*:

7. The request for further review by an appeals committee must be submitted to the coalition in writing within ten (10) calendar days of the date of the Chief Executive Officer or other executive staff person designated by the coalition board's written response to the recipient's formal written appeal.

8. The Chairman of the Coalition Board shall select an appeals committee and a chair of the appeals committee shall be named.
9. The appeals committee shall convene within forty-five (45) calendar days of receipt of the recipient's request for an appeal.
10. The recipient shall be given an opportunity to defend his or her position in an orderly proceeding of the appeals committee.
11. When the meeting of the appeals committee is scheduled, the recipient shall be notified of the date of appeals committee, informed that it is a public meeting, and informed that any information presented may be used by other state agencies.
12. The recipient shall be provided up to thirty (30) minutes to present their position and any information they wish the appeals committee to consider.
13. The coalition staff, excluding the Chief Executive Officer or other executive staff person designated by the coalition board, shall be available to provide any information requested by the committee.
14. The appeals committee will consider all statements, review all documents and may request any additional evidence or information from the parties if an appeals committee member believes it is necessary and relevant to the decision making. The required determination letter will be tolled for the length of time given to provide the additional information.
15. The appeals committee shall select or appoint a member of the coalition, excluding the Chief Executive Officer or other executive staff person designated by the coalition board, to memorialize the events of the appeals committee proceeding and the final determination including the basis for the decision.
16. The appellant shall be notified in writing of the appeals committee's determination within ten (10) days of the date of the meeting.
17. The determination of the appeals committee shall be final.

Due Process for Providers:

Due process procedures for providers is outlined within the State-Wide Provider contract between the coalition and the provider.

Repayment Process:

1. The Early Learning Coalition of Indian River, Martin and Okeechobee Counties will make arrangements for restitution of overpayments with client and/or provider upon receiving notification from the Inspector General of OEL or the Department of Financial Services, Division of Public Assistance Fraud on cases that may be handled internally.

2. The arrangement will include a repayment schedule that is reasonable and not excessive along with due dates and a timeframe for final payment.
3. If there is any interruption in the repayment schedule, a reminder notice will be sent within 10 business days of missing payment to determine the cause and when repayments will resume.
4. If it is determined that no further repayments will be received from the client and/or provider than it will be at the discretion of the Chief Executive Officer whether or not to pursue legal action via a small claims court to recoup the remaining dollars.
5. Whether or not further action is pursued to recoup remaining dollars, if not previously done the client and/or provider continued services will be evaluated on a case-by case basis taking into consideration the type of offense and occurrences.
6. Protective Service clients will be handled on a case by case basis with the Chief Executive Officer.
7. History notes will be placed in the State-Wide data base system indicating that an overpayment occurred and the status of the case, i.e., repayment in process, outstanding balance, etc.
8. Restitution payments will have a corresponding adjustment entered into the State-Wide data base system. The adjustment will reflect the actual occurrence for which restitution is being collected. It will include the appropriate billing group.
9. All restitution payments will require a receipt with a copy provided to the client and/or provider making restitution, a copy to finance and a copy in the client's or provider's electronic file.
10. All restitution payments will be submitted to the Finance Department immediately upon receipt.
11. The Finance Department will forward to the Office of Early Learning any restitution payments received to include fiscal year involved and all corresponding information.

How to Report and File a Complaint:

If you know that one of our employees, a contractor, child care service provider, parent or other benefit recipient has done something wrong, such as falsifying records, committing fraud, or wasting or mismanaging state personnel, equipment or money, you may contact the Early Learning Coalition of Indian River, Martin and Okeechobee Counties at 772-220-1220 or mrosado@elcirmo.org. Additionally, you may contact the Office of Inspector General at 850-717-8605 or inspector.general@oel.myflorida.com. Information on how to report and file a complaint can be found on our website at www.elcirmo.org.

Early Learning Coalition of Okeechobee County

DAILY PAYMENT-RATE SCHEDULE (Effective July --, 2018)

		Full-Time Daily Rates (Completed by COALITION)						
CARE CODE	Description	Licensed or Exempt Providers	Gold Seal Differential	Large Family Child Care Homes	Gold Seal Differential	Family Child Care Homes	Informal Providers	Before or After School
(INF)	<12 MTH	\$21.25	\$25.07	\$19.25	\$22.72	\$18.25	\$9.63	
(TOD)	12<24 MTH	\$19.00	\$22.42	\$17.00	\$20.06	\$16.00	\$8.50	
(2YR)	24 <36 MTH	\$18.25	\$21.54	\$17.25	\$20.36	\$16.25	\$8.63	
(PR3)	36 <48 MTH	\$17.25	\$20.36	\$16.25	\$19.18	\$15.25	\$8.13	
(PR4)	48 <60 MTH	\$17.25	\$20.36	\$16.25	\$19.18	\$15.25	\$8.13	
(PR5)	60 <72 MTH	\$17.25	\$20.36	\$16.25	\$19.18	\$15.25	\$8.13	
(SCH)	In School	\$15.90	\$18.76	\$15.90	\$18.76	\$14.90	\$7.95	
(SPCR)	Special Needs	\$21.25	\$25.07	\$19.25	\$22.72	\$18.25	\$9.63	

		Part-Time Daily Rates (Completed by COALITION)						
CARE CODE	Description	Licensed or Exempt Providers	Gold Seal Differential	Large Family Child Care Homes	Gold Seal	Family Child Care Homes	Informal Providers	Before or After School
(INF)	<12 MTH	\$14.63	\$17.26	\$13.63	\$16.08	\$12.63	\$6.82	
(TOD)	12<24 MTH	\$14.00	\$16.52	\$12.00	\$14.16	\$11.00	\$6.00	
(2YR)	24 <36 MTH	\$13.13	\$15.49	\$12.13	\$14.31	\$11.13	\$6.07	
(PR3)	36 <48 MTH	\$12.13	\$14.31	\$11.13	\$13.13	\$10.13	\$5.57	
(PR4)	48 <60 MTH	\$12.13	\$14.31	\$11.13	\$13.13	\$10.13	\$5.57	
(PR5)	60 <72 MTH	\$12.13	\$14.31	\$11.13	\$13.13	\$10.13	\$5.57	
(SCH)	In School	\$7.25	\$8.56	\$7.25	\$8.56	\$7.25	\$3.63	
(SPCR)	Special Needs	\$14.63	\$17.26	\$13.63	\$16.08	\$12.63	\$6.82	

Additional Information:

Has your coalition adopted a sibling discount rate?

Yes **50%** of the payment rate.

What is the projected number of children to be served within the fiscal year(s) this schedule covers? **400**



Early Learning Coalition
Of Indian River, Martin and Okeechobee Counties, Inc.

**Early Learning Coalition of Indian River, Martin
 & Okeechobee Counties, Inc.**

10 SE Central Parkway, Suite 200
 Stuart, FL 34994
 (772) 220-1220 (877) 220-1223
 Fax: (772) 220-1229

Committee	2018-2019 Committee Appointments
Executive (Meets monthly)	Brandon Tucker, Chair Will Laughlin, Vice-Chair Michelle Akins, Secretary Ann Rodriguez, Treasurer/Finance Chair Julie Bixler, Bylaws Chair Barbara Clowdus, Program Chair Donna Rivett, Member at large Natalie Sanders, Member at large Miranda Hawker, Member at large
Bylaws/Personnel (Meets monthly)	Julie Bixler, Chair Sandy Akre Linda Halpin Richard Reilly Natalie Sanders Joy Yates
Finance (Meets monthly)	Ann Rodriguez, Chair Michelle Akins Miranda Hawker Will Laughlin Steve Newman Karlette Peck
Program Quality (Meets monthly)	Barbara Clowdus, Chair Rhiannon Forker Shonda Hunter Pat McCoy Donna Rivett

Note:

- 1) An odd number of members is required for Executive.
- 2) A minimum of five members is required for each committee.



Early Learning Coalition of IRMO

ACTION ITEM

Action Item: 2017-18.12

Date: 6/28/18

Subject: Retroactive Pay – Staff in Dual Capacity

Background Information

Due to the lengthy merger discussions and pending the outcome, two staff members were functioning in dual roles.

Proposed Action

It is recommended the following staff members receive a one-time retroactive pay in the amounts as follows:

Staff ID #102 - \$21,896.42

Staff ID #70 - \$6,425.66

History of Item:

Committee	Date of Meeting	Action
Board Meeting	5/24/18	Discussed and referred to the Executive Committee for a recommendation.
Executive Committee	6/5/18	Executive Committee discussed and requested staff recommendation for Board meeting.
Board meeting	6/28/18	



Early Learning Coalition of IRMO

ACTION ITEM

Action Item: 2017-18.13

Date: 6/28/18

Subject: Staff Bonus

Background Information

As excess funds are available in the salary line item, Mr. Tucker, at the May 24th meeting, requested a sample of percentage increases for bonus consideration. The sample percentages were shared with the Executive Committee at their June 5th meeting. It was the consensus of the Executive Committee that staff was deserving of a bonus due to the anxiety and pressures during the 16 months of merger discussions.

Proposed Action

The Executive Committee is recommending an 8% bonus for staff.

History of Item:

Committee	Date of Meeting	Action
Board Meeting	5/24/18	Discussion – Request for sample bonus percentages to be submitted to Executive Committee.
Executive Committee	6/5/18	Motion to recommend 8% staff bonus.
Board meeting	6/28/18	