



OFFICE OF
Early Learning

LEARN EARLY. LEARN FOR LIFE.

School Readiness Plan Template

Coalition Identification and Information

Coalition Name: Early Learning Coalition of Southwest Florida
Address: 2675 Winkler Ave., Ste. 300, Ft. Myers, FL 33901
Phone: 239-935-6100
E-mail Address: Susan.block@elcofswfl.org

FEIN #: 651144775
Mailing Address
(if different)
Fax: 239-935-6181

Chair	Executive Director or Chief Executive Officer	Finance Director	Counties Represented
Peter Seif, Interim Chair	Susan Block	Nga Cotter	Collier, Glades, Hendry & Lee

I. COALITION OPERATIONS

A. Membership

SEE ATTACHMENT A

Please complete the **Coalition Membership Form**.

Early Coalition of [Insert coalition name] Approved as of [date added when approved by OEL]								
Count or N/A	Designation in F.S. 1002.83(3) and (4)	Voting Member	Name Address Telephone Number Fax Number Email Address	Affiliation and/or Employment	For multi-county coalitions, indicate the county the member represents	Date Appointed	Length of Current Term and Date it Will End	Term
	Chair, appointed by the Governor	Yes						
	Private sector appointed by the Governor	Yes						
	Private sector appointed by the Governor	Yes						
	Department of Children & Family Services circuit administrator or designee	Yes						
	District superintendent of schools or designee	Yes						
	Regional workforce board executive director or designee	Yes						
	County health department director or designee	Yes						
	President of a Florida College System institution or his or her permanent designee	Yes						

Early Coalition of [Insert coalition name] Approved as of [date added when approved by OEL]								
Count or N/A	Designation in F.S. 1002.83(3) and (4)	Voting Member	Name Address Telephone Number Fax Number Email Address	Affiliation and/or Employment	For multi-county coalitions, indicate the county the member represents	Date Appointed	Length of Current Term and Date it Will End	Term
	Member appointed by Board of County Commissioners or the governing board of a municipality	Yes						
	Head Start Director	Yes						
	Representative of private for-profit child care providers	Yes						
	Representative of faith based child care providers	Yes						
	Representative of program under federal Individuals with Disabilities Education Act	Yes						
	Children services council or juvenile welfare board chair or executive director	Yes, if applicable						
	Child care licensing agency head	Yes, if applicable						
	Central agency administrator	Yes, if applicable						

Early Coalition of [Insert coalition name] Approved as of [date added when approved by OEL]								
Count or N/A	Designation in F.S. 1002.83(3) and (4)	Voting Member	Name Address Telephone Number Fax Number Email Address	Affiliation and/or Employment	For multi-county coalitions, indicate the county the member represents	Date Appointed	Length of Current Term and Date it Will End	Term
	Private Sector Business	Yes, if needed to meet private sector percentage or multi-county representation						
	Private Sector Business	Yes, if needed to meet private sector percentage or multi-county representation						
	Private Sector Business	Yes, if needed to meet private sector percentage or multi-county representation						
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Early Coalition of [Insert coalition name] Approved as of [date added when approved by OEL]								
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Early Coalition of [Insert coalition name] Membership Management Approved as of [date added when approved by OEL]	
I.	TOTAL MEMBERSHIP : 19
II.	TOTAL PRIVATE SECTOR MEMBERSHIP: 8, PRIVATE SECTOR PERCENTAGE: 43%
III.	TOTAL NON-VOTING EX OFFICIO MEMBERSHIP: 0
IV.	NUMBER OF VACANCIES IN REQUIRED POSITIONS: 2

B. Business Organization

Please attach a copy of the coalition’s organization chart as **Attachment I.B.**

C. Articles of Incorporation

Please attach a copy of the coalition’s articles of incorporation as **Attachment I.C.**

N/A

D. Bylaws

Please attach a copy of the coalition's bylaws as **Attachment I.D.**

E. Coalition Fiscal Agent Contract (if applicable)

Please attach a copy of the fiscal agent contract (if applicable) as **Attachment I.E.**

N/A

F. Procurement

Please attach the coalition's procurement policy as **Attachment I.F.**

G. Tangible Personal Property Maintenance

Please attach the coalition's tangible personal property maintenance policy as **Attachment I.G.**

H. Records Maintenance

Please attach the coalition's maintenance of records policy as **Attachment I.H.**

I. Information Technology Security Controls

Please attach the coalition's IT security policy as **Attachment I.I.**

J. Disbursement Controls

Please attach the coalition's disbursement controls policy as **Attachment I.J.**

II. IMPLEMENTATION

A. Minimum Children to be Served by Care Level

Please fill out the **Minimum Children to be Served by Care Level Form** by running **EFS Ad Hoc Report CC085** .

Care Code	Description	Minimum # of Children Served
(INF)	<12 MTH	See Attachment II.A.
(TOD)	12<24 MTH	
(2YR)	24 <36 MTH	
(PR3)	36 <48 MTH	
(PR4)	48 <60 MTH	
(PR5)	60 <72 MTH	
(SCH)	In School	
(SPCR)	Special Needs	
(SPTN)	Special Needs Teen	

If applicable, please attach supporting documentation as **Attachment II.A.**

B. Single Point of Entry Implementation

Please attach the coalition’s policies and procedures for implementing the Single Point of Entry (SPE) as **Attachment II.B.**

C. Unified Wait List Implementation

Please attach the coalition’s policies and procedures for implementing the Unified Wait List (UWL) as **Attachment II.C** and **Attachment II.C.1**

D. Eligibility and Enrollment Policies and Procedures

Please attach the coalition’s eligibility and enrollment policies and procedures as **Attachment II.D.**

E. Parent Access and Choice

Please attach the coalition’s policies and procedures for implementing parent access and choice as **Attachment II.E**.

F. Sliding Fee Scale and Fee Waiver Policies

Please complete the **Sliding Fee Scale For Parent Co-Payments Form**, and attach the coalition’s fee waiver policies as Attachment II.F.

Amount of Daily Parent Copayment per Child (Completed by COALITION)		Percent of 20xx Federal Poverty Guidelines	Income Range (Rounded to the nearest dollar) by Total Number of Family Members										For Each Additional Family Member Add:
			1 Family Member	2 Family Members	3 Family Members	4 Family Members	5 Family Members	6 Family Members	7 Family Members	8 Family Members	9 Family Members	10 Family Members	
Full-Time	Part-Time												
\$ _____	\$ _____	0%	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		≤50%											
\$ _____	\$ _____	>50%											
		≤75%				SEE ATTACHMENT II.F AND II.F.1							
\$ _____	\$ _____	>75%											
		<100%											
\$ _____	\$ _____	≥100%											
		≤116.67%											
\$ _____	\$ _____	>116.67%											
		≤133.33%											
\$ _____	\$ _____	>133.33%											
		≤150%											
\$ _____	\$ _____	>150%											
		≤155.83%											
\$ _____	\$ _____	>155.83%											
		≤161.66%											
\$ _____	\$ _____	>161.66%											
		≤167.49%											

\$ _____	\$ _____	>167.49%											
		≤173.32%											
\$ _____	\$ _____	>173.32%											
		≤179.15%											
\$ _____	\$ _____	>179.15%											
		≤185%											
\$ _____	\$ _____	>185%											
		≤192.5%											
\$ _____	\$ _____	>192.5%											
		≤200%											

G. Use of Pre and Post Assessments

If applicable, what assessment tool does the coalition use to perform pre and post?

My Teaching Strategies.

If applicable, who administers the pre- and post-assessments (coalition/contractor/child care providers).

Child care providers.

If applicable, what are the age ranges that receive a pre and post assessment?

Minimum Age (in months):

1 month :

60 months

Attach supporting documentation as **Attachment II.G.**

N/A

H. Provider Payment Rates

Please complete the **Provider Payment Rate Schedule Form** and attach the coalition’s procedures for implementing the provider rates as **Attachment II.H.**

DAILY PAYMENT-RATE SCHEDULE (Effective _____)

		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							
(TOD)	12<24 MTH		SEE	ATTACHMENT	II . H			
(2YR)	24 <36 MTH							
(PR3)	36 <48 MTH							
(PR4)	48 <60 MTH							
(PR5)	60 <72 MTH							
(SCH)	In School							

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							
(TOD)	12<24 MTH							
(2YR)	24 <36 MTH							
(PR3)	36 <48 MTH							
(PR4)	48 <60 MTH							
(PR5)	60 <72 MTH							
(SCH)	In School							

		Special Needs Rate (Completed by COALITION)	
CARE CODE	Description	Full Time	Part Time
(SPCR)	Special Needs		

III. QUALITY ACTIVITIES AND SERVICES

A. Child Care Resource and Referral (CCR&R) and School-Aged Care

Describe the quality activities and services the coalition will implement to enhance child care resource and referral and school-age care.

See Attachments III.A. and III.A.1.

B. Infant and Toddler Early Learning Programs

Describe the quality activities and services the coalition will implement to enhance infant and toddler early learning programs.

See Attachment III.B.

Please attach any supporting documentation as **Attachment III.B.**

C. Inclusive Early Learning Programs

Describe the quality activities and services the coalition will implement to enhance inclusive early learning programs.

See Attachment III.C.

Please attach any supporting documentation as **Attachment III.C.**

D. Quality Performance Report – SEE ATTACHMENTS III.D AND III.D.1

a. Does the coalition train programs on the Early Learning Guidelines (ELG) adopted by OEL?

- Yes No

If yes, does the coalition track how many programs were trained, by provider type, on the ELGs?

- Yes No

If yes, does the coalition track the number of children served in ELG trained programs?

- Yes No

b. Does the coalition provide targeted technical assistance to programs such as coaching, mentoring, or consulting during the fiscal year? Note: targeted technical assistance is (coaching, mentoring and consultation) designed to address a particular domain/area of quality.

- Yes No

If yes, what type of targeted technical assistance is provided?

- Health and safety
- Infant and toddler care
- School-age care
- Inclusion
- Teaching dual language learners
- Understanding developmental screenings and/or observational assessment tools for program improvement purposes
- Mental health

Business management practices

Other Describe:

c. Does the coalition provide financial supports to early learning providers? Financial supports must be intended to reward, improve, or sustain quality. They can include grants, cash, reimbursements, gift cards, or purchases made to benefit a program. One-time grants, awards, or bonuses include any kind of financial support that a program can receive only once. On-going or periodic quality stipends include any kind of financial support intended to reward, improve, or sustain quality that a program can receive more than once.

Does the coalition provide one-time grants, awards or bonuses to **Child Care Centers**?

Yes No

If yes, describe:

Does the coalition provide one-time grants, awards or bonuses to **Family Child Care Homes**?

Yes No

If yes, describe:

Does the coalition provide on-going or periodic quality stipends to **Child Care Centers**?

- Yes No

If yes, describe:

Does the coalition provide on-going or periodic quality stipends to **Family Child Care Homes**?

- Yes No

If yes, describe:

Please check what types of financial supports are provided to child care teachers/providers?

- Scholarships
- Reimbursement for Training Expenses
- Loans
- Wage supplements
- N/A
- Other Describe:

See Attachment III.D.1.

d. Does the coalition have a voluntary Quality Rating Improvement System (QRIS) in place for the coalition’s service area?

Yes No

If yes, please provide how many levels and a brief description of each level:

QRIS Level	Level Description

Please attach any supporting documentation as Attachment III.D.

IV. FINANCIAL MANAGEMENT

A. Budget

Please fill out **Attachment IV.A Coalition Budget Report**.

B. Prior Year Revenues and Expenditures

Please fill out **Attachment IV.B Coalition Revenue and Expenditure Report**.

V. MONITORING

A. Monitoring Plan and Procedures

Please attach a copy of the coalition’s policies and procedures for monitoring SR Program providers as **Attachment V.A.**
and ATTACHMENT V.A.1.

B. Grievance/Complaint Resolution

Please attach a copy of the grievance policies and procedures that address complaints made by parents and child care providers as **Attachment V.B.** SEE ATTACHMENT V.B AND V.B.1

VI. COALITION PLAN VALIDATION

A. Public Input

Please attach copies of proof of public input, such as coalition minutes as **Attachment VI.A.**

By signing below, I hereby certify that all information provided in this plan is accurate and complete to the best of my belief and knowledge. I certify that all services will be provided in accordance with the plan as approved by the Florida Office of Early Learning (OEL). I further certify that the local services will be provided in compliance with all applicable federal, state, and local laws and regulations and the State Child Care and Development Fund Plan approved by the Federal Department of Health and Human Services.

Chair Signature: _____

Executive Director: _____

Printed Name: _____

Printed Name: _____

Date Signed: _____

Date Signed: _____

I. COALITION OPERATIONS

A. Membership

Please complete the **Coalition Membership Form**.

Early Learning Coalition of Southwest Florida Approved as of [date added when approved by OEL]								
Count or N/A	Designation in F.S. 1002.83(3) and (4)	Voting Member	Name Address Telephone Number Fax Number Email Address	Affiliation and/or Employment	For multi-county coalitions, indicate the county the member represents	Date Appointed	Length of Current Term and Date it Will End	Term
1	Required Member Chair, appointed by the Governor Board Chair	Yes	Vacant					
2	Required Member Private sector appointed by the Governor	Yes	Vacant					
3	Required Member Private sector appointed by the Governor Interim Board Chair	Yes	Peter Seif 10970 S. Cleveland Avenue, Suite 406 Fort Myers, FL 33907 Phone: 239-790-7000 Cell: 239-671-8744 Fax: 239-790-7004 Email: pseif@snworks.com	President, Synergy Networks, Inc.	All	Nov. 4, 2009	N/A <hr/> April 30, 2016	2

Early Learning Coalition of Southwest Florida
Approved as of [date added when approved by OEL]

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4	Required Member Department of Children & Family Services circuit administrator or designee	Yes	Sherrie Quevedo 2295 Victoria Avenue Ft. Myers, FL 33901 Phone: 239-895-0243 Work Cell: 239-821-4501 Cell: 239-464-5152 Fax: 239-338-1287 Email: Sherrie_Quevedo@dcf.state.fl.us	Child Care Regulation Supervisor, Dept. of Children & Families	All	Feb. 12, 2014	<u>Ongoing</u>	N/A
5	Required Member District superintendent of schools or designee	Yes	Dr. Elizabeth McBride 5775 Osceola Trail Naples, FL 33971 Phone: 239-377-0123 Cell: 239-822-9114 Fax: N/A Email: mcbridel@collierschools.com	Director Early Learning Collier County School District		Aug. 18, 2017	Jan. 1, 2014 To <u>Dec. 31, 2017</u>	
6	Required Member Regional workforce board executive director or designee Board Secretary	Yes	Joe Paterno 9530 Marketplace Rd, Suite 104 Ft. Myers, FL 33912 Phone: 239-225-2500 Cell: 239-872-0829 Fax: 239-225-2525 Email: jpaterno@sfwdb.org	Executive Director, Workforce Development Board	All	Jan. 1, 2005	<u>Ongoing</u>	N/A

Early Learning Coalition of Southwest Florida
Approved as of [date added when approved by OEL]

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7	Required Member County health department director or designee	Yes	Stephanie Vick, M.S., B.S.N, RN 3339 East Tamiami Trail Naples, FL 34112 Phone: 239-252-5332 Cell: 239-253-7453 Fax: N/A Email: Stephanie.Vick@flhealth.gov	Florida Dept. of Health Collier County Administrator	Collier	Oct. 11, 2016	Jan. 1, 2017 To Dec. 31, 2020	1
8	Required Member President of a Florida College System institution or his or her permanent designee	Yes	Dr. Denis G. Wright 26300 Airport Road Punta Gorda, FL 33950 Phone: 941-637-5682 Cell: 904-652-7143 Fax: 941-637-2322 Email: Denis.Wright@fsw.edu	President Charlotte Campus & Hendry/Glades Center and VP of Economic & Community Development, Florida SouthWestern State College	All	Oct. 8, 2014	Ongoing	N/A
9	Required Member Member appointed by Board of County Commissioners or the governing board of a municipality	Yes	Stephanie Busin 429 Royal Palm Avenue Clewiston, Florida 33440 Phone: N/A Cell: 239-229-6385 Fax: N/A Email: stephaniebusin@yahoo.com	Designee, Glades County Board of County Commissioners	Hendry/Glades	July 25, 2016	Jan. 1, 2014 To Dec. 31, 2017	1
10	Required Member Head Start Director	Yes	Yara Duchesne 551 W. Cowboy Way LaBelle, FL 33935 Phone: 863-674-4652 Cell: 863-202-5187 Fax: N/A Email: yara@rcma.org	Program Coordinator, RCMA	Hendry/Glades Counties	Dec. 12, 2016	Jan. 1, 2017 To Dec. 31, 2020	1

Early Learning Coalition of Southwest Florida
Approved as of [date added when approved by OEL]

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11	Required member Representative of private for-profit child care providers	Yes	Jennifer Lange 868 94 th Avenue North Naples, FL 34108 Phone: 239-597-5064 Cell 239-777-3696 Fax: N/A Email: jenhineslange@aol.com	Owner/Director/Lead VPK Teacher Little People's School	Collier	June 25, 2014	Jan. 1, 2013 To Dec. 31, 2017, Extension approved at 3-22-17 Bd. Mtg.	1
12	Required Member Representative of faith based child care providers	Yes	Ashley Houk 250 Sixth Street South Naples, FL 34102 Phone: 239-262-8315 Cell: 239-271-6369 Fax: 239-262-1275 Email: ashleyh@fpcnaples.org	Preschool Director, First Presbyterian Preschool	Collier	June 19, 2013	Jan. 1, 2014 To Dec. 31, 2017	1
13	Required Member Representative of program under federal Individuals with Disabilities Education Act Board Vice-Chair	Yes	Trina Puddefoot 8961 Daniels Center Drive, #401 Ft. Myers, FL 33912 Phone: 239-433-6700, ext.227 Cell: 239-910-5199 Fax: 239-433-6703 Email: trinapuddefoot@hpcswf.com	Program Director Early Steps/Health Planning Council	All	Jan. 13, 2010	<u>Ongoing</u>	N/A

Early Learning Coalition of Southwest Florida
Approved as of [date added when approved by OEL]

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	Conditional Member Children services council or juvenile welfare board chair or executive director	Yes, if applicable						
	Conditional Member Child care licensing agency head	Yes, if applicable						
14	Conditional Member Central agency administrator	Yes, if applicable	Damaris Boone 402 W. Main Street Immokalee, FL 34142 Phone: 863-674-4652 Cell: 239-834-4017 Fax: N/A Email: damaris@rcma.org	Early Education Outcome Analyst, Redlands Christian Migrant Association (RCMA)	All	Feb. 24, 2016	<u>Ongoing</u>	N/A
15	Private Sector Member Business	Yes, if needed to meet private sector percentage or multi-county representation	Katie Haas 11500 Fenway South Drive Fort Myers, FL 33913 Phone: 239-226-4760 Fax: N/A Cell: 617-721-5792 Email: khaas@redsox.com	Senior Director of FL Business Operations, Boston Red Sox	Lee	Jan. 1, 2016	Jan. 1, 2016 To Dec. 31, 2019	1

Early Learning Coalition of Southwest Florida
Approved as of [date added when approved by OEL]

Count or N/A	Designation in F.S. 1002.83(3) and (4)	Voting Member	Name Address Telephone Number Fax Number Email Address	Affiliation and/or Employment	For multi-county coalitions, indicate the county the member represents	Date Appointed	Length of Current Term and Date it Will End	Term
16	Private Sector Member Business	Yes, if needed to meet private sector percentage or multi-county representation	Michele King 9981 S. Healthpark Drive Ft. Myers, FL 33908 Phone: 239-343-5890 Cell: 239-823-8533 Fax: 239-343-6466 Email: michele.king@leehealth.org	Director Child Advocacy Program, Golisano Children's Hospital of Southwest Florida	Lee	Sept. 26, 2017	Sept. 26, 2017 To Dec. 31, 2018	1
17	Private Sector Member Business	Yes, if needed to meet private sector percentage or multi-county representation	Victor Mraz 5245 Big Pine Way, Suite 102 Fort Myers, FL 33907 Phone: 239-231-1345, x-414 Cell: 239-691-2914 Fax: 239-244-8294 Email: vmraz@financialguide.com	Financial Representative, Blue Chip Financial of Southwest Florida	Lee	Dec. 17, 2014	Jan. 1, 2016 To Dec. 31, 2019	1
18	Private Sector Member Business	Yes, if needed to meet private sector percentage or multi-county representation	Marshall Bower 2266 Second Street Fort Myers, FL 33901 Phone: 239-337-0433 Cell: 239-822-2181 Fax: 239-337-7077 Email: Marshall@leeschoolfoundation.org	President & CEO, The Foundation for Lee County Public Schools	Lee	Dec. 17, 2014	Jan. 1, 2015 To Dec. 31, 2018	1

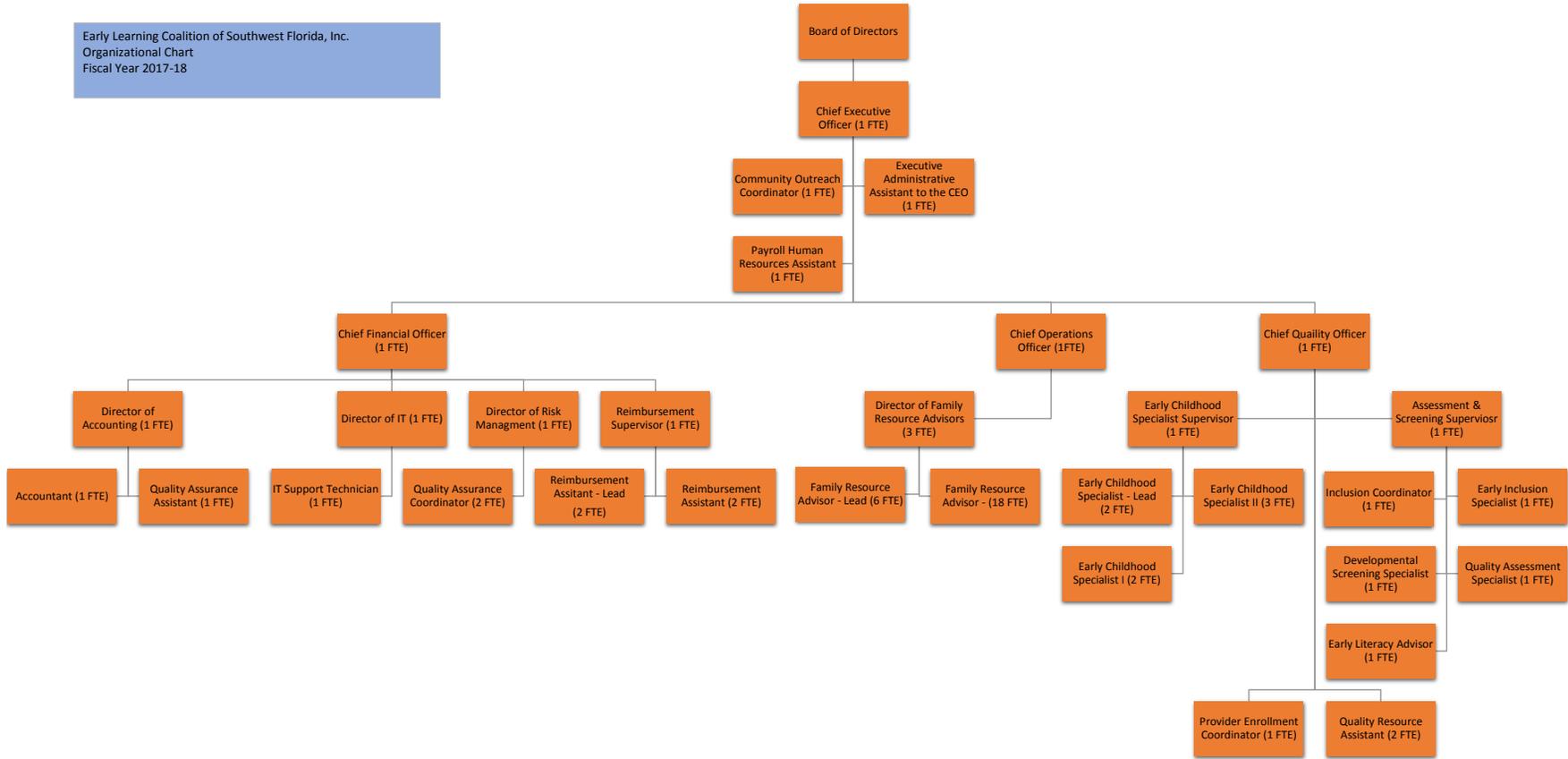
Early Learning Coalition of Southwest Florida
Approved as of [date added when approved by OEL]

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19	Private Sector Member Business	Yes, if needed to meet private sector percentage or multi-county representation	Jason Himschoot 2030 McGregor Blvd. Ft. Myers, FL 33901 Phone: 239-333-2992 Cell: 239-910-0653 Fax: N/A Email: JHimschoot@gadelaw.com	Attorney, Goede, Adamczyk, Deboest and Cross, PLLC	Lee	Sept. 26, 2017	Sept. 26, 2017 To Dec. 31, 2018	1
20	Private Sector Member Business Board Treasurer	Yes, if needed to meet private sector percentage or multi-county representation	Douglas Szabo 1715 Monroe Street Fort Myers, FL 33901 Phone: 239-344-1260 Work Cell: 239-841-9227 Fax: 239-344-1570 Email: Douglas.Szabo@henlaw.com	Attorney, Henderson, Franklin, Starnes & Holt, P.A.	Lee	Jan. 1, 2016	Jan. 1, 2016 To Dec. 31, 2019	1
21	Private Sector Member Business		Kimberly Ross 933 45 th Street West Palm Beach, FL 33407 Phone: 561-841-1000 Cell: 863-233-6500 Fax: N/A Email: Kimberly@hanleyfoundation.org	Prevention Specialist, Hanley Foundation	Hendry/Glades	Sept. 26, 2017	Sept. 26, 2017 To Dec. 31, 2020	1

Early Learning Coalition of Southwest Florida Approved as of [date added when approved by OEL]								
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22	Private Sector Member Business		Vacant		Hendry/Glades			

Early Learning Coalition of Southwest Florida Membership Management Approved as of [date added when approved by OEL]	
I.	TOTAL MEMBERSHIP : 19
II.	TOTAL PRIVATE SECTOR MEMBERSHIP: 8, PRIVATE SECTOR PERCENTAGE: 43%
III.	TOTAL NON-VOTING EX OFFICIO MEMBERSHIP: 0
IV.	NUMBER OF VACANCIES IN REQUIRED POSITIONS: 2

Early Learning Coalition of Southwest Florida, Inc.
Organizational Chart
Fiscal Year 2017-18



ARTICLES OF INCORPORATION
OF
THE EARLY LEARNING COALITION OF SOUTHWEST FLORIDA, INC.
(A Corporation Not for Profit)

In compliance with Chapter 617, Florida Statutes, the undersigned, all of whom are residents of the state of Florida and all of whom are of full age, have this day voluntarily associated themselves together for the purpose of forming a corporation not for profit and do hereby certify:

ARTICLE I
Name of Corporation

The name of this corporation is **THE EARLY LEARNING COALITION OF SOUTHWEST FLORIDA, INC.**

ARTICLE II
Principal Office

The principal office of the organization is located at 12651 McGregor Blvd., Suite 4-402, Ft. Myers, FL 33919.

ARTICLE III
Registered Agent and Registered Office

The street address of the registered office of this corporation in the state of Florida is 12651 McGregor Blvd., Suite 4-402, Ft. Myers, FL 33919. The Board of Directors may from time to time move the registered office to any other address in Florida. The initial registered agent of this corporation is Sabra Cecil, Chairperson, whose address is 9990 Coconut Road, Bonita Springs, FL, 34135.

ARTICLE IV

Purpose

This corporation does not contemplate pecuniary gain or profit to its members, and is organized exclusively for charitable and educational purposes. The specific purpose for which this corporation is formed is to implement section 411.01, Florida Statutes and the Voluntary Prekindergarten Amendment, HB1-A. Under section 411.01 and HB0001A, the purposes for forming this corporation include, but are not limited to, the following:

1. To prepare children from birth to 5 years of age, or until the child enters kindergarten, to enter kindergarten ready to learn.
2. To create a program to be administered by the Early Learning Coalition of Southwest Florida, Inc.
3. To implement a comprehensive program of readiness services that enhance the cognitive, social, and physical development of children to achieve the performance standards and outcomes measures specified by the Agency for Workforce Innovation (AWI), Office of Early Learning.
4. To accommodate the needs of children for extended-day and extended-year services to meet the needs of parents who work.
5. To insure coordinated staff development and teaching opportunities.
6. To provide expanded access to community services and resources for families to help achieve economic self-sufficiency.
7. To ensure a single point of entry and a unified waiting list.
8. To serve at least as many children as were served prior to implementation of the Early Learning Coalition of Southwest Florida, Inc., program, as long as funding or eligible populations do not decrease.
9. To ensure there is a community plan to address the needs of all eligible children.

ARTICLE V

Powers

This corporation shall have the following powers:

1. The corporation shall have the power to do all lawful acts which are, in the opinion of the Board of Directors of the Corporation, necessary or desirable to carry out the purposes and accomplish the objectives of the corporation, and which are consistent with the provision of Florida Statutes. The corporation shall have all powers granted to corporations not for profit under Chapter 617, Florida Statutes, whether or not specifically enumerated in these Articles of Incorporation or the By-Laws.
2. No substantial part of the activities of the corporation shall be the carrying on of propaganda, or otherwise attempt to influence legislation, and the corporation shall not participate in, or intervene in (including the publishing or distribution of statements) any political campaign on behalf of or in opposition to any candidate for public office.
3. The corporation shall remain a corporation not for profit. No dividends shall be paid by the corporation, and no part of the net earnings of the corporation shall inure to the benefit of, or be distributed to, its directors or officers or services rendered and to make payments and distributions in furtherance of the exempt purposes set forth in these Articles.
4. These Articles are a part of the Coalition's School Readiness Plan and any amendments to them constitute an amendment to the Plan.

ARTICLE VI
Operating Restrictions

If the corporation is at any time deemed to be a private foundation, it shall be subject to the following rules: The corporation shall distribute its income for each tax year at such time and in such manner as not to become subject to the tax on undistributed income by Section 4942 of the Internal Revenue Code of 1986, as amended. The corporation shall not engage in any act of self-dealing as defined in Section 4941(d) of the Internal Revenue Code of 1986, as amended. The corporation shall not retain any excess business holdings as are defined in Section 4943 (c) of the Internal Revenue Code of 1986, as amended. The corporation shall not make any investments in such manner as to subject it to tax under Section 4944 of the Internal Revenue Code of 1986, as amended. The corporation shall not make any taxable expenditures as defined in Section 4945 (d) of the Internal Revenue Code of 1986, as amended.

ARTICLE VIII
Board of Directors

The Board of Directors shall be composed of at least 18, but not more than 35, members. The composition of the Board must conform to the provision of HB0001A, and Section 411.01(5)(a)3, and 11., F.S.. The Board of Directors will be elected according to the method stated in the bylaws of the corporation.

ARTICLE IX
Officers

The officers of this corporation shall be elected or appointed by the Board of Directors to serve for one year terms following the method set forth in the bylaws of the corporation. The Chair shall be appointed by the

Governor and may serve up to a 4 year term. There shall be a Chair, Vice-Chair, a Secretary and a Treasurer, each of whom shall be a non-conflicted member of the Board of Directors. The Board of Directors may from time to time elect or appoint additional officers who shall also be member of the Board of Directors.

ARTICLE X

Duration

The corporation shall exist perpetually, unless dissolved according to law.

ARTICLE XI

Dissolution

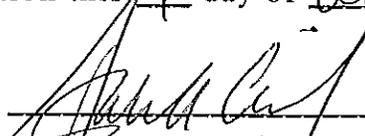
Upon dissolution of the corporation, any assets remaining after the satisfaction of all corporate liabilities shall be conveyed to (1) such organization or organizations as shall be selected by the affirmative vote of a majority of the Directors, provided, however, that such organization or organizations must be recognized as exempt from federal income taxation under Section 170(c) (2) of the Internal Revenue Code of 1986, as amended, or corresponding sections of any prior or future law; or (2) to the federal, state, or local government for exclusive public purpose.

ARTICLE XII
Incorporators

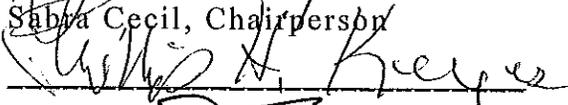
The Incorporators to these Articles of Incorporation are:

Name	Address
<u>Sabra Cecil</u>	<u>9990 Coconut Road, Bonita Springs, FL 34135</u>
<u>Phillip Keyes</u>	<u>P.O. Box 128, LaBelle, FL 33975</u>
<u>Alan Dimmitt</u>	<u>5687 Naples Boulevard, Naples, FL 34109-2023</u>

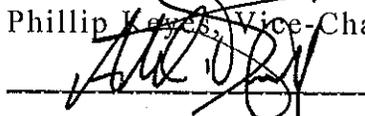
IN WITNESS WHEREOF, for the purposes of forming this corporation under the laws of the state of Florida, the undersigned incorporators of THE EARLY LEARNING COALITION OF SOUTHWEST FLORIDA, INC., have executed these Articles of Incorporation this 4th day of October 2005.



Sabra Cecil, Chairperson



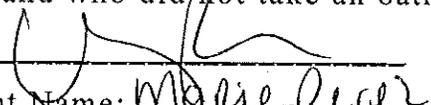
Phillip Keyes, Vice-Chairperson



Alan Dimmitt, Treasurer

STATE OF FLORIDA
COUNTY OF LEE

BEFORE ME, the undersigned authority, personally appeared SABRA CECIL, who is personally known to me or produced _____ as identification, and who acknowledged the execution of the foregoing Articles of Incorporation of THE EARLY LEARNING COALITION OF SOUTHWEST FLORIDA to be the duly authorized act and deed of said corporation, for the purpose therein expressed and who did not take an oath.



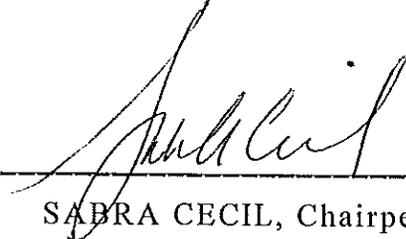
Print Name: Marie Perez
Notary  Commission #DD230626
Expires: Jul 09, 2007
Brenda Carr
Atlantic County, Georgia

In pursuance of Chapter 48.091, Florida Statutes, the following is submitted, in compliance, with said Act:

First, that THE EARLY LEARNING COALITION OF SOUTHWEST FLORIDA, INC., desiring to organize under the laws of the State of FLORIDA, with its principal office, as indicated in the Articles of Incorporation, at the City of FORT MYERS, County of LEE, State of Florida, has named SABRA CECIL, located at 9990 Coconut Road, Bonita Springs, FL, 34135, County of LEE, State of Florida, as its agent to accept service of process within this State.

ACKNOWLEDGEMENTS:

Having been named to accept service of process for the above stated corporation, at place designated in this certificate, I hereby accept to act in this capacity, and agree to comply with the provision of said Act relative to keeping open said office

By  _____
SABRA CECIL, Chairperson



Early Learning Coalition of Southwest Florida, Inc.

Bylaws

Article I. NAME AND LOCATION OF ORGANIZATION

1.1 NAME OF ORGANIZATION

The name of the organization shall be the **Early Learning Coalition of Southwest Florida, Inc.**, hereinafter referred to as the Coalition.

1.2 LOCATION OF THE COALITION

The Office of the Coalition is located at 2675 Winkler Avenue, Suite 300, Fort Myers, Florida 33901.

1.3 HISTORY

The Early Learning Coalitions were established in 1999 pursuant to Section 411.01 of the Florida Statutes.

1.3.1. At that time, Hendry and Glades counties chose to join together as one (1) Coalition known as the Hendry/Glades School Readiness Coalition. Collier County and Lee County each created an individual coalition for its county, designated as the Collier County School Readiness Coalition and the Lee County School Readiness Coalition.

1.3.2. In December 2004, Section 411.01 of the Florida Statutes was amended to incorporate Voluntary Pre-Kindergarten funding and the three local county coalitions merged into one of thirty-one (31) coalitions statewide.

1.3.3. In July 2013, Section 411.01 of the Florida Statutes was rewritten. The resulting statute for the thirty (30) coalitions statewide is HB 7165.

1.3.4. As of July, 2013, the Florida State Statutes were rewritten to create the Office of Early Learning within the Office of Independent Education and Parental Choice. ss. 1001.213, F.S.

Article II. PURPOSE AND RESPONSIBILITIES

2.1 PURPOSE AND SCOPE OF THE COALITION

2.1.1. The purposes for which this Coalition is organized are exclusively to fulfill the intent of Florida ss. 1002.80 F.S. (School Readiness Act), and Section. 1002.55-79, F.S., (Voluntary Pre-kindergarten Education Act). The Legislature recognizes that early learning programs increase children's chances of achieving future educational success and becoming productive members of society.

2.1.2. The Coalition Governance Policy is intended to work in tandem with these Bylaws.

2.2 AUTHORITY

The Coalition is authorized to implement the provisions of the School Readiness Act, ss. 1002.81-.97 F.S., and the Voluntary Prekindergarten Education Act, ss.1002.51-.79 F.S., in Collier, Glades, Hendry, and Lee Counties.

2.3 MISSION AND MOTTO OF THE COALITION

2.3.1. Our mission is to enhance the quality of children’s lives by providing families, early childhood educators, caregivers and community partners in Collier, Glades, Hendry and Lee Counties, with opportunities to positively impact the future.

2.3.2. Our Motto is “Nurturing young children of Southwest Florida and those who care for them!”

2.4 VISION OF THE COALITION

All children in Collier, Glades, Hendry, and Lee communities will be healthy, eager, and successful learners, supported by well-informed parents, involved citizens, and collaborative community partners. Early learning programs will have high quality standards; comprehensive services; seamless delivery systems with diverse settings; and well-educated, competent, and adequately compensated staff.

2.5 RESPONSIBILITIES

2.5.1. In carrying out the intent of the HB 7165, the Coalition is required to develop and administer a plan for the early learning program to meet the requirements of the statute and the performance standards and outcome measures established by the Office of Early Learning.

2.5.2. The Articles of Incorporation and the Bylaws are a part of the Coalition’s plan and any amendments to them constitute an amendment to the plan.

2.6 POLICIES

2.6.1. The Coalition will have policies approved by the Board to guide operations and processes, including but not limited to, dispute resolution for parents, providers, coalition staff, and all interested parties.

2.6.2. Subsequent minor, non-substantive changes, which do not alter the original intent to the policy previously approved by the Board, will not require full Board approval and may be approved by the Executive Committee.

2.6.3. The Board must be notified of any policy revisions approved by the Executive Committee.

Article III. MEMBERSHIP

3.1 MEMBERSHIP

3.1.1. s.1002.83 (2), F.S. requires that the Coalition shall have at least fifteen (15) but not more than thirty (30) members. Within this range, the coalition’s membership maynot exceed the number of members necessary for the appointment of the mandatory members, conditional members, private-sector members, or optional members authorized by Office of Early Learning.

3.1.2. The Coalition shall seek applications of persons who are ready, willing, and able to commit service and time, including attending coalition meetings, committee involvement, and reading and becoming educated about many aspects of early childhood development and school readiness.

3.1.3. Each multi-county coalition’s membership must be geographically representative of each county served by the coalition.

3.1.3.1. The coalition’s membership will assure that each county’s representation aligns proportional to the level of the coalition grant. Where the rotation of members creates a disproportionate representation of one county over the other, the Board will adjust existing terms and vote to approve such adjustments to assure proportionate representation.

3.1.4. The Coalition shall seek applications of persons with diverse abilities, including those from diverse ethnic and multicultural groups.

3.1.5. The Governor appoints the Chair and two (2) other members who must meet the same qualifications as private sector business members appointed by the coalition s.

1002.83(3) F.S.

3.1.6. Coalition membership -- s 1002.83 (4) F.S., requires each early learning coalition to appoint coalition members consistent with law.

3.1.7. A member who no longer represents the constituency in the assigned capacity shall notify the chair in writing and the seat shall remain vacant until the Board identifies a new representative.

3.1.8. With the exception of the mandatory positions and those appointed by the Governor, all Board appointments and reappointments to Board positions shall be made with Board approval.

3.2 MANDATORY MEMBERS

Pursuant to ss.1002.83.5 F.S., the coalition must include the following member positions; however in a multicounty coalition, each ex officio member position may be filled by multiple nonvoting members but no more than one voting member shall be seated per member position. If an early learning coalition has more than one member representing the same entity, only one of such members may serve as a voting member:

3.2.1. A Department of Children and Family Services Regional administrator or designee who is authorized to make decisions based on behalf of the department.

3.2.2. A district superintendent of schools or designee.

3.2.3. A regional workforce board executive director or designee.

3.2.4. A county health department director or his or her designee.

3.2.5. A children’s services council or juvenile workforce board chair or executive director, if applicable, who shall be a non-voting member if the council or board is the fiscal agent of the coalition or if the council or board contracts with and receives funds from the coalition, if applicable.

3.2.6. An agency head of a local licensing agency as defined in ss. 402.302 F.S., if applicable.

3.2.7. A president of a Florida College System institution or his/her permanent designee.

3.2.8. One member appointed by a board of county commissioners or the governing board of a municipality.

3.2.9. A central agency administrator, if applicable.

3.2.10. A Head Start director.

3.2.11. A representative of private “for-profit” child care providers, including private,for-profit family day care homes.

3.2.12. A representative of faith-based child care providers.

3.2.13. A representative of programs for children with disabilities under the federal “Individuals with Disabilities Education Act”.

3.3 PRIVATE SECTOR MEMBERS

3.3.1. The Governor will appoint the Chair and two (2) other members from the private business sector. Private sector members appointed by the Governor will serve at the pleasure of the Governor and in terms designated by the Governor.

3.3.2. Including the members appointed by the Governor, more than one-third of each early learning coalition must be private sector business members, either for-profit or nonprofit, who do not have, and none of whose relatives as defined in s. 112.3143 has, a substantial financial interest in the design or delivery of the Voluntary Pre- kindergarten Education Program created under Part V of Chapter 1002, F.S. or the coalition’s School Readiness program.

3.3.3. To serve as a private sector business member representative, the following requirements will apply:

3.3.3.1. They must reside in Florida; and

3.3.3.2. Be an employee, manager or owner of a **business entity**, as defined for the purposes of this guidance which operates in the coalition’s area of responsibility.

○ *“Business entity” means any form of corporation, partnership, association, cooperative, joint venture, business trust, or sole proprietorship that conducts business in this state. Private sector corporations may be for-profit or nonprofit 1002.83(5).*

3.3.3.3 **A private sector business member** of a coalition may not be an employee, manager or owner of an organization that is not a “business entity” as defined above. For example, an individual should not be an employee, manager or owner of:

- The early learning coalition or of the fiscal agent, service provider, contractor, or subcontractor of the coalition;
- A School Readiness provider, private prekindergarten provider, public school, or school district;
- A child care facility, family day care home, large family child care home, nonpublic school, or faith-based child care provider;
- A state university, community college, or other public educational institution;
- The federal or state government; a state, county, or municipal government; or a public agency; or
- A not-for-profit corporation or a non-profit cooperative association unless such corporation/association is among the largest 25 percent of employers, ranked by number of employees, in a county within an early learning coalition’s region.

3.3.3.4. A private sector business member of the coalition may not have a substantial financial interest in the design or delivery of the School Readiness or Voluntary Pre-kindergarten programs.

3.3.3.5. The ratio of private sector members is based on the total number of seated board members.

3.3.3.6. Vacant member positions are not included in the total board membership calculation; however, coalitions must make every effort to fill vacant positions. In order to meet this requirement an early learning coalition must appoint additional members who meet the criteria for appointment as a private sector business member. *For example, if an early learning coalition has a fifteen (15) member board, then the coalition will meet this requirement if it has appointed six (6) private sector business members.*

3.3.3.7. Private sector individuals, the individual’s relatives, and the business entity must not have a substantial financial interest in the design or delivery of the SR or Voluntary Pre-kindergarten Education Program or an early learning coalition’s School Readiness Program. As used in this paragraph, the term “relative” has the meaning ascribed in ss. 112.3143, F.S.

“Relative” means any father, mother, son, daughter, husband, wife, brother, sister, father-in-law, mother-in-law, son-in-law, or daughter-in-law.”

“Substantial financial interest” refers to standards established by the Agency in accordance with section 11002.83.(5), F.S., for appointment of private sector business members. A coalition board member, a coalition board member’s relative, or a coalition board member’s business entity has a

substantial financial interest in the Voluntary Pre-kindergarten Education (VPK) Program or an early learning coalition's School Readiness Program, if:

1. The coalition board member, the coalition board member's relative, or the coalition board member's business entity has direct or indirect ownership of more than 5 percent of the total assets or capital stock, cumulatively, of one or more of the "**proscribed sources of income**" listed in section (2) below; or
2. During the prior two (2) years, more than 5 percent of the gross income of the coalition board member, coalition board member's relative, or coalition board member's business entity was derived, cumulatively, from one or more of the **proscribed sources** listed in the section below.

"Proscribed sources of income" is defined as sources of income derived from interests in the design or delivery of the VPK Program or the School Readiness Program, including, but not limited to, the following sources:

- (a) The Department of Economic OPP, the Agency's Office of Early Learning, the Department of Children and Families, the Department of Education, or a contractor or subcontractor of any of these agencies;
- (b) An early learning coalition, or a coalition's or former coalition's fiscal agent, service provider, contractor, or subcontractor;
- (c) A school district's or public school's preschool program for children from birth until eligibility for admission to kindergarten in a public school under section 1003.21(1)(a)2., F.S., if the coalition board member's or coalition board member's relative's income was derived from employment in an elected or appointed position in the school district or public school which is responsible for:
 1. Financial decisions affecting the preschool program, including development of the program's budget or disbursement of funds for the program;
 2. Recommendation or adoption of rules, regulations, or policies relating to the operation of any aspect of the preschool program;
 3. VPK or School Readiness Program instruction, curriculum development, or service delivery; or
 4. Management of the preschool program's operations or personnel or for personnel carrying out the responsibilities described above;
- (d) A public or private provider delivering the VPK Program;
- (e) A public or private provider delivering an early learning coalition's School Readiness Program;
- (f) A national child care accrediting organization providing accreditation to Florida based child care providers, public schools, or private schools;
- (g) A Department of Children and Families approved Gold Seal child care accrediting organization,
- (h) An accrediting association that is a member of any of the organizations listed in paragraphs (2)(f) or (2)(g) above;
- (i) A vendor of educational materials or supplies, including, but not limited to, books, curricula, or equipment; and
- (j) An organization designed to represent any of the individuals, organizations, or business entities listed in (2)(a) through (2)(i) above.

3.3.4. Private sector members appointed by the governor may serve a maximum of two (2) consecutive four (4) year terms.

3.3.5. Other than those membership terms stipulated in the legislation, the terms of all appointed members of the Coalition must be staggered.

3.3.6. Not counting the Governor appointees, the private sector membership shall have each of the three coalitions (Collier, Hendry/Glades and Lee) represented, whenever possible, by at least one (1) possible and not more than four (4) members with terms of four (4) years, for no more than two (2)

consecutive terms.

3.4 OPTIONAL MEMBERS

3.4.1. In addition to the mandatory members specified in law, each early learning coalition may appoint up to one optional member from each county served by the coalition.

3.4.2. Each optional member must reside in, or must represent a legal entity located in the county from which the member is appointed.

3.4.3. Optional member and the member's relatives must not have a substantial financial interest in the design or delivery of the Voluntary Pre-Kindergarten Education Program or the coalition's School Readiness Program.

3.4.4. Optional members may not duplicate representation of a legal entity, or of a mandated or conditional membership position.

3.4.5. The Coalition is encouraged to appoint as one of its optional members, a parent of a child enrolled in the Voluntary Pre-Kindergarten Program or the coalition's School Readiness Program. The parent must meet the same criteria in section 3.4.3 above.

3.5 CONDITIONAL MEMBERS

3.5.1. A children's services council or juvenile workforce board chair or Chief Executive Officer, if applicable.

3.5.2. An agency head of a local licensing agency as defined in ss. 402.302 F.S., if applicable.

3.5.3. Central Agency director, if applicable.

3.6 TERMS OF OFFICE

3.6.1. Private Sector Members

Private sector members may serve a maximum of (two) 2 consecutive four (4)-year terms from date of appointment to the Coalition Board.

3.6.2. Mandatory and Conditional Members

a. Mandatory positions pursuant to ss. 1002.83.(4), , F.S., of entities serving the four (4) county area (i.e., Department of Economic Opportunity, Child Care Licensing, etc.) shall not be subject to rotation and will serve on an ongoing basis.

b. Mandatory positions of entities serving pre-merger geographic areas, shall serve one (1) four-year term. The mandatory position will be rotated among the three pre-merger coalitions (Collier, Hendry/Glades, and Lee).

c. Private, for profit and faith-based representative child care providers may serve one (1) four year terms.

3.6.3. Optional Members

a. Optional Members may serve a designated term, followed by a second term consistent with the length of the initial appointment.

b. The appointment of optional members is dependent on whether the number of existing private sector members will support the addition of an optional board member.

3.7 POWERS AND DUTIES

The powers, management, and control of the Coalition Board, and all its affairs shall be vested in the Coalition Board as outlined in the ss. 1002.84, F.S. The members of the Coalition shall possess the following powers and duties:

3.7.1. To approve Bylaws for the Early Learning Coalition of Southwest Florida, Inc.

3.7.2. To approve amendments to the Bylaws.

3.7.3. To elect by majority vote of all voting members, the officers of the Coalition, with the exception of any Governor appointee as Chair.

3.7.4. To establish procedures relating to its membership representation from private, faith-based, family child care providers, representative of children with disabilities, and appointed members from the community.

3.7.5. To remove any representative or appointed member of the Coalition by a two-thirds vote of a quorum of the voting members whenever, in their judgment, the best interests of the organization would be served. The Secretary before the next Coalition meeting shall give a notice of removal in writing.

3.7.6. Governor appointees may not be voted out; however they may be asked to resign. The Governor's office is to be notified of issues which caused the request for resignation.

3.7.7. To act on such official recommendations from the, Office of Early Learning, as may be received and which fall within the focus of the organization.

3.7.8. To manage and control the Coalition and all of its affairs vested in the members as outlined in s. 1002.55-79, F.S.

3.8 VOTING AND NON-VOTING REQUIREMENTS

3.8.1. A mandatory board position may have additional representation from another county if approved by the Board. However, only one representative may serve as a voting member.

3.8.2. Each voting member, for purposes of section 112.3143 (3) (a) is considered a local public officer and must disclose, in accordance with the provisions of section 112.3143 (3) (a), the nature and extent of any conflict of interest and abstain from voting or participating when a conflict of interest exists. Furthermore, no voting member shall participate in the selection, award, and administration of a contract if a real or apparent conflict of interest would be involved (45 C.F.R. s. 74.42).

3.9 MEMBERSHIP ATTENDANCE

3.9.1. Coalition members are expected to attend all regular meetings.

3.9.2. Any member who has two (2) consecutive unexcused absences or more than three (3) unexcused absences annually shall be considered as voluntarily resigned from the Coalition's Board. Unexcused absences are defined in the Coalition Governance Policy.

3.9.3. When mandated members, including gubernatorial appointments, do not attend as required, the Coalition Chair will write the appointing authority, including the Governor of the State of Florida, notifying of the member's absences and requesting the appointment of a designated replacement.

3.9.4. The Board may reinstate members in special circumstances. Reinstatement under special circumstances must be documented by the Chair.

3.9.5. An early learning coalition board may use any method of telecommunications to conduct meetings, including establishing a quorum through telecommunications, provided that the public is given proper notice of a telecommunications meeting and reasonable access to observe and, when appropriate, participate, s. 1002.83 (6), F.S.

3.10 MEMBERSHIP RESIGNATION, TERMINATION, AND COMPENSATION

3.10.1. Any member may resign by giving written notice to the Chair. Governor appointees must provide written notice to the Governor's office with a copy to the Coalition Chair.

3.10.2. Resignations shall take effect at the time specified in the notice and the acceptance of such resignation shall not be necessary to make it effective.

3.10.3. Members will not receive any compensation for their services.

3.10.4. Travel expenses related to Coalition business, other than the regularly scheduled local

Board meetings, shall be reimbursed by the Coalition.

Article IV. OFFICERS OF THE ORGANIZATION

4.1 ELECTION OF OFFICERS

A Coalition, non-conflicted, voting member in good standing shall be eligible for nomination and election to any elective office of the Coalition.

4.1.1. Each elected officer shall take office at the annual meeting at which time officers will be installed. Annual meeting is defined as the first meeting of the calendar year.

4.1.2. Elected officers shall serve for a term of one year or until a successor is duly qualified and elected.

4.1.3. Officers may serve in the same position for a maximum of four consecutive years; officers may be nominated to serve additional terms after a one-year break in service unless otherwise approved by the majority of the Coalition. Two exceptions:

4.1.3.1. The Chair who is appointed by the Governor.

4.1.3.2. The Treasurer, if appointed by the Governor, the term shall coincide with the length of the appointment.

4.1.4. If an office is vacated prior to the completion of a one-year term, a member in good standing may be appointed by the Chair and approved by the members to fill the vacancy until the term ends.

4.1.5. Each officer shall serve as a voting member of the Coalition and provide leadership to the Coalition's planning and programs.

4.1.6. The voting membership shall elect the officers for vice-chair, treasurer and secretary by majority vote.

4.1.7. The nominee for each position, receiving the highest number of votes, shall be elected.

4.2 POWERS AND DUTIES OF OFFICERS

The powers and duties of officers shall be:

4.2.1. The Chair shall develop the agendas and preside at all regular Coalition meetings.

4.2.2. The Chair shall appoint, with the approval of the voting members, chairpersons of all committees and perform such other duties as prescribed.

4.2.3. The Vice-Chair shall serve in the Chair's place and with the Chair's authority in the case of that officer's absence, inability, or unwillingness to serve.

4.2.4. The Vice-Chair shall oversee the work of, and ensure the submission of, reports from the chairs of all committees.

4.2.5. The Treasurer shall keep an account of monies received and expended for the use of the Coalition and shall make a report at the annual meeting or when called upon by the Chair.

4.2.6. The Secretary shall ensure that notice required by these Bylaws is given and keep records of all proceedings of the Coalition. The Secretary may perform any other duties incident to the Office of Secretary, or assigned by the Chair.

Article V. COALITION STAFF

5.1 THE ROLES OF THE CHIEF EXECUTIVE OFFICER AND STAFF

5.1.1. The Board of Directors hires the Chief Executive Officer, who reports directly to the Board of Directors.

5.1.2. All staff report to the Chief Executive Officer, or their department director, as outlined in the approved organizational chart.

5.1.3. The Chief Executive Officer is responsible to:

5.1.3.1. Manage the non-profit organization and its employees under the direction of the full board; day-to-day activities are the responsibility of the Chief Executive Officer, such as supervising the hiring, firing, and evaluation of all staff and directing staff in the assignment and performance of duties;

5.1.3.2. Initiate and directs the development of policies for Board Approval and implements those policies;

5.1.3.3. Represent the organization as its Chief Executive Officer in all dealings with other organizations, individuals, and the general public;

5.1.3.4. Develop short range (one-year) goals for the organization and works with the Board to prepare long-range plans for the organization;

5.1.3.5. Reports to the Board on the progress towards organizational objectives, new state policies, directives and legislation, and other issues of concern to the Board.

5.2 ACCOUNTABILITY

5.2.1. The Chief Executive Officer is accountable to the full Board.

5.2.2. He/she is not accountable to any individual member of the Board.

5.2.3. The Board will instruct the Chief Executive Officer, delegating interpretation and implementation of policies and directives to the Chief Executive Officer.

Article VI BOARD MEETINGS

6.1 REGULAR MEETINGS

6.1.1. Regular Board meetings shall be held at a time and place to be decided by the members. The Coalition will meet bi-monthly unless decided otherwise by members.

6.1.2. An early learning coalition board may use any method of telecommunications to conduct meetings, including establishing a quorum through telecommunications, provided that the public is given proper notice of a telecommunications meeting and reasonable access to observe and participate is provided in ss. 1002.83 (6), F.S.

6.1.3. The annual meeting is defined as the Coalition's regular meeting in the first month of the calendar year.

6.1.4. A special meeting may be called by the Chair upon concurrence by a majority of the Coalition Board Members or upon petition signed by a majority of the Coalition.

6.1.5. A quorum of voting members must be established at the start of a meeting and prior to conducting any Coalition business.

6.2 MEETING NOTIFICATIONS

6.2.1. Notice of all Coalition meetings will be made pursuant to ss. 195.901 F.S.

6.2.2. Notice of Board meetings shall be posted and made available by mail, fax, or by electronic means to each Coalition member, with an agenda prepared by the Chair, no less than seven (7) calendar days prior to the meeting date.

6.2.3. Emergency sessions shall be afforded the most appropriate and effective notice under the circumstances. Special meetings shall have at least 24 hours' reasonable notice to the public.

6.3 GOVERNING RULES

6.3.1. The Coalition shall adopt rules of procedure for the conduct of its business.

6.3.2. Robert's Rules of Order, Newly Revised, (latest edition), shall govern all official proceedings of the Coalition, subject to such special rules as the Coalition may adopt.

6.3.3. Members of the Coalition are subject to the ethics provisions in Section 112.313 (Standards of Conduct for Public Officers, etc.), 112.3135 (Restriction on Employment of Relatives), and 112.3143 (Voting Conflicts). For 112.3143, a voting member of a coalition must abstain from voting when a voting conflict exists.

6.3.4. Members of the Coalition are subject to Florida State Statute 286.011 F.S., commonly known as the Government in the Sunshine Law.

6.4 VOTING REGULATIONS

6.4.1. A majority of the voting membership (51%) of the coalition constitutes a “quorum”. A majority of the voting membership of an early learning coalition constitutes a quorum required to conduct the business of the Coalition.

6.4.2. Fifty-one percent (51%) of the voting members present either physically or through telecommunication, shall constitute a quorum for the transaction of business at any meeting of the Coalition Board.

6.4.3. If less than fifty-one percent (51%) of the voting membership is in attendance at a Board meeting; a majority of the members present may adjourn the meeting without further notice.

6.4.4. A voting member of an early learning coalition may not appoint a designee to act in his or her place, except as a representative to coalition meetings, but that representative does not have voting privileges ss. 1002.83 (7), F.S.

6.4.5. Any action legally exercised by the Coalition shall be valid without further approval.

6.4.6. A conflict of interest may occur when an item is presented for a vote that will directly affect the member, his/her employer, another organization in which they have significant interest or in which he/she have a direct financial interest.

6.4.7. Members shall disclose orally the nature of the conflict and abstain from discussion or voting on the matter and complete a conflict of interest form.

Article VII. COMMITTEES

7.1 COMMITTEES

7.1.1. Standing committees shall be established by the Coalition.

7.1.2. Ad hoc committees and task forces may be established by the Chair, the Executive Committee or the Coalition.

7.1.3. All committee chairs shall provide a report to the Coalition at the next regularly scheduled meeting.

7.1.4. All committee action items must be submitted to the Executive Committee in advance of Board Meetings.

7.1.5. To avoid duplication of issues or attendees, committees may join together to consolidate common interests and goals.

7.1.6. A quorum of committee members must be present prior to conducting a committee meeting. (See Governance for committee guidelines).

7.2 COMMITTEE MEMBERSHIP

7.2.1. The Chair of each committee shall be a member of the Coalition Board and be appointed by the Coalition Chair.

7.2.2. Committee chairs serve a one-year term. Chairs may be re-appointed to serve more than a one-year term.

7.2.3. Each committee shall consist of the chair and at least two (2) additional individuals who are not required to be board members.

7.2.4. Representatives from the community may serve as members of any standing committee and task force as needed to carry on the work of the Coalition, with the exception of the Executive Committee.

7.2.5. Committees may join together for meetings and be chaired by the same Board member if it is deemed more efficient and effective in serving the Coalition.

7.2.6. Each committee shall meet as necessary at meeting times designated by the committee chair.

7.2.7. Notice of all committee meetings will be made pursuant to Florida ss. 286.011

F.S., commonly known as the Government in the Sunshine Law.

7.2.8. Each committee chair shall submit written minutes to the Coalition members, and present committee outcomes at the next regularly scheduled Coalition meeting.

7.3 NOMINATIONS and BYLAWS COMMITTEE

7.3.1. The Coalition Chair shall appoint the Nominations and Bylaws Committee Chair each year.

7.3.2. The Nominations and Bylaws Committee shall consist of a majority of Coalition members and to the extent possible, all counties.

7.3.3. The Nominations and Bylaws Committee is responsible for presenting to the Coalition a slate of officers for election one month prior to the annual meeting.

7.3.4. Nominations may also be submitted from the floor by members at the annual meeting.

7.3.5. This standing committee will approve and ensure adherence to the Coalition's By-laws, be responsible for recruiting members, nominating officers, development of policies, as it relates to board membership and upholding the Coalition's required membership composition.

7.3.6. The Committee will also be responsible for reviewing other types of Coalition policies and recommending to the Coalition Board for approval.

7.4 PROGRAM COMMITTEE

7.4.1. The Program Committee will be composed of members of the Coalition and the communities.

7.4.2. The committee will be responsible for developing and recommending quality initiatives in compliance with Federal Code section 45 CFR 98.51 "Activities to improve the quality of child care".

7.4.3. The committee will promote the development, accessibility, and accountability of an articulated professional development path and community support system.

7.4.4. The committee will focus on ways to improve program delivery and ensuring children are receiving the services needed to get them ready for school.

7.4.5. This standing committee will approve and ensure adherence to the Coalition's By-laws, be responsible for the development of policies as it relates to program issues.

7.4.6. The Coalition Chair will appoint a board member as Chair of this committee.

7.5 FINANCE COMMITTEE

7.5.1. The Treasurer will be the Chair of this committee.

7.5.2. The Finance Committee will be comprised of members of the Coalition and the communities.

7.5.3. This committee will provide regular monitoring of financial and utilization reports and provide budgetary and fiscal policy oversight.

7.5.4. This standing committee will approve and ensure adherence to the Coalition's By-laws, be responsible for the development of policies as it relates to fiscal issues.

7.6 EXECUTIVE COMMITTEE

7.6.1. The Executive Committee will be composed of officers and the chairpersons of all committees.

7.6.2. The committee is responsible for oversight of the Coalition's responsibilities and business.

7.6.3. The committee serves to review all policies recommended by the standing committees, ahead of consideration by the full Board.

7.6.4. The committee shall also have the authority to approve urgent matters that occur between meetings of the full Coalition Board, and to bring them to the full board at the next regularly scheduled meeting.

7.7 HUMAN RESOURCES/PERSONNEL COMMITTEE

7.7.1. The Coalition Chair shall appoint the Human Resources/Personnel Committee Chair each year.

7.7.2. The Human Resources/Personnel Committee shall consist of a majority of Coalition members and, to the extent possible, all counties.

7.7.3. The Human Resources/Personnel Committee is responsible for consideration of matters pertinent to assurance of legal and fiscal policies related to personnel of the Coalition.

7.7.4. This standing committee will approve and ensure adherence to the Coalition's By-laws, be responsible for the development of policies as it relates to personnel issues.

7.7.5. Where needed, the Committee will also be responsible for the organization and execution of a search process to fill the position of Chief Executive Officer. This includes, but is not limited to, recommending a final candidate to the Coalition Board for approval.

7.8 AD HOC COMMITTEES

7.8.1. Ad Hoc Committee may be established by the Chair as needed.

7.8.2. Ad Hoc Committees may be established for specific time-limited issues. The duties and composition of each committee will be determined at the time of establishment. An Ad-Hoc Committee may be comprised of members of the Coalition and the communities.

7.8.3. The Ad-Hoc Committees will be responsible for bringing recommendations to the Coalition Board or Chair, as requested.

Article VIII. PROGRAM

8.1 PROGRAM PARTICIPATION

8.1.1. The Board is responsible to oversee and assure implementation of the School Readiness and Voluntary Prekindergarten Programs.

8.1.2. The School Readiness Program and the Voluntary Pre-kindergarten Education Program must meet the program expectation and implementation guidelines as outlined in ss.1002.81 F.S. (School Readiness Act) and ss.1002.55, F.S. and in any subsequent legislative revisions.

8.1.3. The Coalition shall be guided by a plan submitted periodically and will be monitored and revised as needed by submitting plan amendments.

8.1.4. The Coalition has three roles: (a) developing and implementing policies; (b.) monitoring School Readiness and Voluntary Prekindergarten status; and (c) managing the systems necessary to improve the quality of early care and education services in the Collier, Lee, Hendry, and Glades Counties.

8.1.5. The Coalition will work in partnership with communities to strengthen and coordinate services that will improve the quality of early care and education in Collier, Lee, Hendry and Glades counties. The Coalition will develop and implement policies, manage systems, and provide monitoring and support for School Readiness and Voluntary Pre-Kindergarten service providers.

Article IX. BOOKS AND RECORDS

9.1 RECORDKEEPING

9.1.1. The Coalition will maintain thorough records of the minutes of all Coalition Board meetings and maintain a complete Coalition Board and Coalition Board Committee membership roster.

9.1.2. Correct and complete books and records of the proceedings of the Coalition, its committees, and its financial accounts will be kept and maintained at the Coalition office for a period of five (5) years and will be subject to the inspection of any member of the Coalition or the public at any reasonable time.

9.2 AUDIT

An audit of the books and records shall be conducted annually by an independent auditor.

The audit report shall be presented to the members of the Finance Committee and the Executive Committee, to be shared with the Coalition Board within thirty (30) days of its completion.

Article X. BYLAWS

10.1. IMPLEMENTATION

These Bylaws shall become effective immediately upon adoption. The members of the Coalition shall have the authority to enact and adopt any amendment to the Bylaws that may be necessary.

10.2. AMENDMENTS

The articles of the Bylaws can be amended using the following procedure:

10.2.1. Any member of the Coalition can propose an amendment to the Articles of the Bylaws. Proposed amendments shall be in writing and be submitted to the Chair.

10.2.2. The Chair shall ensure that notice of any proposed amendment to the Articles of the Bylaws is provided to the Coalition membership at least seven (7) days prior to the consideration of action on the proposed amendment. At the Chair's discretion, the notice may include the complete text of the proposed amendment, but must include a summary of the intent of the proposed amendment with administrative and financial implications.

10.2.3. Any proposed amendment to the Articles of the Bylaws shall be approved by a two-thirds vote by the members of the Coalition present and voting.

10.2.4. An amendment to the Bylaws shall be effective upon adoption by the members of the Coalition

10.2.5. The Bylaws are a part of the coalition's plan and any amendments to them constitute an amendment to the plan.

DATES AMENDED:

(Approved August 29, 2005)
(Amended October 1, 2005)
(Amended November 29, 2006)
(Amended January 24, 2007)
(Amended March 26, 2008)
(Amended May 28, 2008)
(Amended January 21, 2009)
(Amended March 18, 2009)
(Amended November 4, 2009)
(Amended March 10, 2010)
(Amended September 8, 2010)
(Amended August 28, 2013)
(Amended May 21, 2014)
(Amended February 4, 2015)
(Amended June 17, 2015)
(Amended December 16, 2015)
(Amended September 28, 2016)
(Amended March 22, 2017)

E. Fiscal Agent Contract

N/A



Early Learning Coalition of Southwest Florida

Policy: I-PO-D	Procurement	Revision Date:	October 25, 2016
Effective Date:	January 25, 2017	Board Approval Date:	January 25, 2017

PROCUREMENT

Procurement is a complex function guided by numerous state and federal statutes, regulations and policies. Policy will assure that the Coalition continues any procurement process in accordance to all requirements.

I. Policy aligns with federal regulations, state statute and rule requirements.

A. State instructions

*Requirements for purchasing, contracting and procurement activities are detailed in state statutes and rule. Written policy disclosures should describe these requirements for staff, instruct staff of their responsibility to follow these requirements, and document detailed processes **OR** provide cross-reference(s) for staff to where these details can be accessed in other written Coalition manuals or files.*

1. Compliance with section 287.057, F.S. – Procurement of commodities or contract services

Chapter 287 Florida Statutes (F.S.) deals with and defines procurement procedures under which the Coalition must operate. Included are definitions regarding contractual services, when competitive bidding is necessary and when it is not, and specifics regarding contract documents. Policies used by the Coalition will provide sufficient written staff instructions to promote and support activities that meet the legislative intent of Florida's procurement laws as summarized here (s. 287.001, F.S.).

- To promote fair and open competition without favoritism.
- To ensure that public funds are spent wisely via adequate documentation and effective monitoring mechanisms.
- To establish uniform procedures to ensure effective and ethical procurement of contractual services; and
- To ensure improprieties are curbed and public confidence is maintained.

2. Compliance with section 215.971, F.S. - Agreements

Policies used by the Coalition will comply with disclosure requirements for all agreements funded by federal and/or state monies passed-through the State Treasury.

- All terms and conditions necessary to govern the relationship between the agency and the provider. These terms and conditions provide the legal basis for enforcing the agreement.
- A specific and clearly defined scope of work that identifies all tasks the provider is to perform and should include specific instructions on how these tasks are to be accomplished if necessary.
- Specific deliverables (quantifiable, measurable and directly related to the scope of work). Each task identified in the scope of work should be tied to a deliverable. Remember, deliverables are the events that trigger payment.
- Specific language that makes all records available for inspection. Public access is allowed to all documents, papers, letters, or other materials related to the contract, unless records are exempt from Section 24(a) of Article 1 of the State Constitution and Subsection 119.07(1), F.S.
- Specific remedies for noncompliance/nonperformance of required services. Remedies should be identified for each area of noncompliance/nonperformance.
- Specific steps for pro-rating invoice amounts if minimum performance standards are not met. Remember, cost reimbursement and fixed price agreements should include minimum performance standards that ensure an adequate level of services are provided.
- Sub-contracting/sub-granting terms, if applicable.
- The timing, nature, and substance of all reports the provider is required to prepare.

- A provision for the disposition of property purchased with state funds. If the agreement is for contractual services and the property has a useful life greater than one year and costs \$1,000 or more, it should be returned to the State upon agreement termination.
- Payment terms (e.g., frequency of payments, method of payment and required documentation).

3. Compliance with section 287.058, F.S. – Contract document

Policies used by the Coalition will comply with minimum disclosure requirements for contracts and purchase order agreements in excess of the threshold amount provided in s. 287.017 for Category Two (\$35,000).

- Bills for fees, compensation or expenses will be submitted with enough details for proper pre-audits and post-audits thereof.
- Bills for any travel expenses will be authorized, documented and reimbursed in accordance with Section 112.061, F.S.
- Contractor to comply with contract delivery terms (criteria), related timelines and final completion date(s) as specified.
- Renewal clause (if authorized by related procurement files) for a period that may not exceed 3 years or the term of the original contract, whichever is longer. Note: emergency or exceptional purchases cannot be renewed.
- Intellectual property rights for pre-existing property (ownership usually remains with Contractor), for created/developed property (ownership by State of FL), or proceeds from sale/licensing activities (ownership determined as specified by applicable state statute). [s. 287.058(1), F.S.]

4. Compliance with Rule 60A-1.002, FAC – Purchase of commodities or contract services

State rule(s) for purchasing describe how a Coalition may exercise its authority in procuring services. It describes the procurement process required for all types of contracts and presents the correct purchasing methods for all contractual services and commodities. Policies used by the Coalition will comply with applicable instructions from state purchasing rule(s).

B. Federal instructions

*Federal grant program rules and requirements for purchasing, contracting and procurement activities are detailed in Office of Management and Budget (OMB) Uniform Grant Guidance. Written policy disclosures should describe these requirements for staff, instruct staff of their responsibility to follow these requirements, and document detailed processes **OR** provide cross-reference(s) for staff to where these details can be accessed in other written Coalition manuals or files.*

1. General procurement standards

- a. Policies used by the Coalition will apply to all Coalition activities/ purchases made. [2 CFR Part 200.403(c)]
- b. Disclose in writing any potential conflicts of interest. [2 CFR Part 200.112]
- c. Maintain written standards for handling instances of conflict of employees or other individuals impacted by procurement activities. [2 CFR Part 200.318]

If the non-Federal entity has a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, the non-Federal entity must also maintain written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the non-Federal entity is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.

- d. Avoid purchasing items that are duplicative or not necessary for the performance of activities required by federal award. [2 CFR part 200.318(d)]
- e. Perform lease vs. purchase analyses when appropriate to determine the most economical and practical choice. [2 CFR Part 200.318(d)]
- f. When possible, use state and local inter-Coalition agreements to procure common or shared goods and services. [2 CFR Part 200.318(e)]
- g. Use federal excess and surplus property instead of purchasing new equipment and property when possible and if such activity helps reduce program/project costs. [2 CFR Part 200.318(f)]
- h. Conduct all procurement transactions in a manner that allows for full, open and fair competition. [2 CFR Part 200.319]

- i. Not use state or geographical preferences in the evaluation of bids or proposals except where federal statutes mandate or encourage it. [2 CFR Part 200.319(7)(b)]
- j. Make purchases using one of the allowed methods of procurement. [2 CFR Part 200.320]
- k. Contract when possible with small and minority businesses. [2 CFR Part 200.321]
- l. Comply with instructions for procurement of recovered materials. [2 CFR Part 200.322]
- m. Comply with applicable cost and price analysis requirements for procurement transactions. [2 CFR Part 200.323]
- n. All related records must be available for inspection and review upon request by federal awarding agency or pass-through entity. [2 CFR Part 200.324]
- o. Comply with bonding requirements for construction-related contracts. (if allowable). [2 CFR Part 200.325]
- p. Include all required/applicable contract provisions/disclosures in writing. [2 CFR Part 200.326]

2. Contract files - required contents

Requirements for contracts administration/management are detailed in federal and state grant program laws, rules and regulations. Written policy disclosures should describe these requirements for staff, instruct staff of their responsibility to follow these requirements, and document detailed processes OR provide cross-reference(s) for staff to where these details can be accessed in other written Coalition manuals or files.

Contracts administration/management

Once a contract has been executed it enters the last phase of the contract management system. During this phase of contract management, day to day activities are managed by the assigned contract manager. Overall performance results are documented and monitoring tasks are also performed. Adequate documentation of goods/services procured, goods/services received, payments made and compliance with federal and state grant program rules is required. The file forms/processes listed here represent minimum contracts administration/management documentation requirements for Coalition contract agreements.

- a. **Formal contract documents** [45 CFR § 75.327(a); 45 CFR § 75.329; and 45 CFR § 92.36 and s. 287.057(15), F.S.]
 - 1) Original executed (signed) contract/grant
 - 2) Contractor name
 - 3) Contract amount
 - 4) Subcontracts, memorandums of agreement, if applicable
 - 5) Amendments
 - 6) Renewals
 - 7) Bonds
 - 8) Insurance
 - 9) Funding source(s)
 - 10) Contract relationship [Ch. 69I-5.006, FAC and 45 CFR Part 75.351]
 - 11) Provider's justification of need for advance, if applicable
 - 12) Scoped reporting requirements (evaluation reports, performance measures, etc.)
- b. **Day-to-day management documents** [s. 287.057(15), F.S. ; DFS FCCM Manual; 0A-1, FAC; 45 CFR Part 75.327(a); 45 CFR Part 75.329]
 - 1) Performance documentation
 - 2) Correspondence
 - 3) Payment documentation
 - 4) Deliverables
 - 5) Subcontractor approvals
 - 6) Status of reporting requirements
 - 7) Contract monitoring
 - a) SR/VPK provider contracts – see separate sections of SR Plan for more information, not addressed here
 - b) Contractors
 - c) Subrecipients
- c. **Formal monitoring process** [CFOM No. 06 (2011-12), Contract Monitoring and Documenting Contract Performance]
 - 1) Risk Assessment

- 2) Monitoring Plan
 - 3) Monitoring Procedures and Criteria
 - 4) Evidence to support conclusions reached during its monitoring process
 - 5) Corrective Action Plan (if required)
 - 6) Follow-up on Corrective Action (if required)
- d. Other related contracts administration activities**
- 1) Subrecipient contracts and subawards
 - a) Risk assessments – planning and monitoring phases
 - b) Additional disclosures and special conditions
 - 2) Contracts Closeout
 - 3) Problems with Contractor Performance
 - 4) Contract Termination
 - 5) Prior approval documentation requirements
 - 6) Conflict of Interest disclosures (if applicable)
 - a) Coalition governing board members
 - b) Coalition employees
 - c) Relative(s) of either group as defined in statute
 - d) Organizational conflicts

Have procedures and related documented staff instructions to establish contract/grant manager responsibilities. (Reference Coalition Business Services Manual, #I-PR-D)

II. Have adequate procedures for separating contract management and fiscal management duties

A. State instructions – s. 215.971, F.S.

Contract/Grant manager responsibilities

For each agreement funded by federal or state financial assistance, the Coalition’s Director of Risk Management (DRM): Contracts & Compliance functions as the contract/grant manager. The grant manager shall be responsible for enforcing performance of the agreement’s terms and conditions and shall serve as a liaison to the contractor(s). Separate duties for contract administrator have also been identified as listed. These duties are assigned to Coalition staff as described here:

1. Contract/Grant Manager (DRM)
 - a. Create and maintain a contract file
 - b. Maintain financial information on all contracts
 - c. Manage changes to contract(s)
 - d. Serve as liaison between the Coalition and OEL
 - e. Provide clear, explicit and documented communication.
2. Director of Accounting (DOA)
 - a. Manage the receipt of goods/services
 - b. Monitor and evaluate provider performance and end user satisfaction
 - c. Serve as liaison with the provider/contractor
 - d. Maintain a contract management file pursuant to CFO Memo No. 06 (2011-12)
 - e. Provide written certification that goods were received / services were obtained per terms and conditions before making payment
 - f. Prepare cost reconciliation files
 - g. Prepare a final reconciliation report

B. Federal instructions [2 CFR Part 200.318(b)]

1. Contract administration files are maintained and contain the following items.
 - a. Required documentation based on the Coalition’s related authorization policies and purchasing limits.
 - b. Required documentation based on additional applicable grant program laws, rules regulations and guidance.
2. Contract files include documentation for Authorization of work.
 - a. No work authorized until contract is fully approved and executed.
 - b. No change in work is authorized until a fully approved and executed contract amendment is in place.

- c. No contract amendment for work will be executed without required review/approval based on the Coalition's related policies /limits and any related grant terms from funding source.
- 3. Conformance of work – establish and maintain a system based on applicable laws, rules, regulations and grant provisions to reasonably ensure goods/services are received as intended and when intended.
- 4. Contract/Grant manager will authorize payment of invoices to contracts after final approval of work products.

III. Establish who has authority to procure commodities and services:

Reference Coalition Business Services Manual, #I-PR-D

IV. Establish staff spending limits as follow:

The Purchasing Monetary Thresholds are as follow:

- Unit value (1) up to \$499; one internet written quote or written records of phone/verbal quote with at least one CMBE quote or documented attempt of obtaining a CMBE quote;
- Unit value (2) between \$500 and \$4,999; three internet written records of phone/verbal quotes with at least one CMBE quote or documented attempt of obtaining a CMBE quote;
- Unit value (3) between \$5,000 and \$24,999; three vendor written quotes with at least one CMBE quote or documented attempt of obtaining a CMBE quote;
- Unit value (4) between \$25,000 and \$34,999; advertisement for competitive proposals or bids; and
- Unit value (5) over \$35,000; invitation to bid (ITB), intent to negotiate (INT) or request for proposal (RFP).

The Coalition capitalization threshold is \$5,000

Purchasing and Disbursements

The Coalition strives to maintain adequate segregation of duties in purchasing and disbursement functions. These duties are assigned to Coalition staff as described in the Control Grid:

Control Grid – Purchasing and Disbursements

Coalition strives to maintain adequate segregation of duties in its purchasing and disbursements functions. The following table illustrates how responsibilities have been assigned. In this table personnel are identified as follows:

- A. [Chief Executive Officer]
- B. [Service Area Chief Officer]
- C. [Service Area Director/Supervisor]
- D. [Director of Accounting]
- E. [Accountant]
- F. [Business Service Administrative Assistant]

Duty	A	B	C	D	E	F
Inputs data into contractor master file			X	X		
Obtains Form W-9 from new contractors		X	X			
Initiates purchases		X	X			X
Authorizes purchases	X	X				
Prepares purchase order/requisition		X	X			X
Prepares request for proposal		X	X			
Administers collection of proposals		X	X			
Evaluates proposals		X	X	X		
Selects contractor	X	X				
Receives contractor invoice		X			X	X
Approves contractor invoice	X	X	X			
Assigns general ledger coding		X		X	X	
Inputs invoice into A/P system				X	X	
Selects A/P to be paid				X	X	
Runs A/P checks				X	X	
Reviews checks	X	X		X		
Signs checks*	X					

Mails checks				X		X
Maintains custody of unused checks		X				X
Reconciles A/P to general ledger		X		X		
Performs bank reconciliation		X			X	
Reviews cancelled checks	X	X				
Reviews bank reconciliations		X		X		

**To ensure continuity of service, multiple positions are identified except check signing as board members can also sign checks.*

V. Policy includes process to address conflicts of interest and related party contracts based on federal regulations, state statute and rule.

A. State instructions

*Instructions: Requirements for proper advanced notice of and processing for real or potential voting conflicts for related party activities are detailed in state statutes and rule. Written policy disclosures should describe these requirements for staff, instruct staff of their responsibility to follow these requirements, and document detailed processes **and** provide cross-reference(s) for staff to where these details can be accessed in other written Coalition manuals or files.*

1. Section 112.3143(1)(b) – Voting Conflicts
2. Section 1002.84(20), F.S. – Coalitions; SR powers and duties; transparency and accountability for related party contracts
3. Training processes for staff and governing board members are required.

Conflicts of interest and related party activities

Policies used by the Coalition will comply with applicable instructions from federal grant program regulations, state purchasing rule(s), statute(s) and related program guidance from OEL.

The Coalition’s policies will –

1. Provide instructions for any public officer to disclose in advance (in writing) real and/or perceived voting conflicts and to abstain from any vote and from related purchasing/procurement discussions. “Public officer” includes any person elected or appointed to hold office in any agency, including any person serving on an advisory body, such as the Coalition’s governing board.
2. Inform staff that contracts with the “relative” of an Coalition employee or governing board member, as defined in s. [112.3143\(1\)\(c\)](#), F.S., may not be executed without the approval of OEL.
3. Provide and document training processes for staff and governing board members on reporting requirements for conflicts of interest.
 - For more details on the Coalition’s Conflict of Interest policy, please refer to the Business Service Manual, policy #I-PO-B2
 - For more details on requirements for Related Party activities and Voting Conflicts, please refer to Procurement/Purchasing policies, Section VI
 - For more details on state statutory instructions, please refer to OEL’s Program Guidance, *Related Party Disclosures*,
 - See the Florida Commission on Ethics *Guide to the Sunshine Amendment and Code of Ethics for Public Officers and Employees*.
 - See the Florida Commission on Ethics *Overview of Laws relating to Gifts*.
 - See the Florida Commission on Ethics *Overview of Laws relating to Honoraria*.
 - See OEL’s Uniform Guidance 2 CFR Part 200, Policy updates for Conflicts of Interest.

B. Federal instructions

*Federal grant program rules and requirements for codes of conflict and reporting conflicts of interest are detailed in OMB Uniform Grant Guidance. Written policy disclosures should describe these requirements for staff, instruct staff of their responsibility to follow these requirements, and document detailed processes **and** provide cross-reference(s) for staff to where these details can be accessed in other written Coalition manuals or files.*

The Coalition’s policies will -

1. Disclose in writing any potential conflicts of interest. [2 CFR Part 200.112]
2. Disclose in writing all violations of federal criminal law involving fraud, bribery or gratuity violations potentially affecting the federal award. [2 CFR Part 200.113]

3. Maintain written standards for handling instances of conflict of interests for employees/others impacted by procurement activities. [2 CFR Part 200.318]
If the non-Federal entity has a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, the non-Federal entity must also maintain written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the non-Federal entity is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.
4. Written standards will provide staff the following minimum disclosures.
 (Coalition Employee Reference, Code of Ethics & Conduct and Conflict of Interest, pg. 44)
 - a. What constitutes a conflict of interest?
 - 1) Basic concepts including real conflicts, perceived conflicts and organizational conflicts.*
 - 2) Instructions in regard to financial interests, gifts, gratuities, favors and nepotism.
 - 3) Identify the conditions under which outside activities, relationships, or financial interests are proper or improper.
 - b. Conflict of Interest (COI) disclosure requirements
 - 1) Provide for advance notification of outside activities, relationships, or financial interests to a responsible Coalition official.
 - c. Address Violations of policy
 - 1) Include a process for notification and review by responsible official(s) of potential or actual violations of the standards.
 - 2) Specify the nature of penalties or disciplinary action(s) that may be imposed (up to and including termination of employment).

VI. Policy establishes how to maintain (content and duration) procurement files?

*Requirements for contracts administration/management are detailed in federal and state grant program laws, rules and regulations. Written policy disclosures should describe these requirements for staff, instruct staff of their responsibility to follow these requirements, and document detailed processes **and** provide cross-reference(s) for staff to where these details can be accessed in other written Coalition manuals or files.*

Requirements for purchasing and procurement files

All Coalition employees are responsible in different aspects, for the preparation, receipt and maintenance of adequate documentation of Coalition purchasing and procurement activities. Policies used by the Coalition will provide sufficient written staff instructions to promote and support activities that meet federal and state procurement law requirements as summarized here. (Coalition Business Services Policy Manual and related policies and procedures).

The Coalition policies will disclose -

A. Requirements for procurements with related party considerations [s. 1002.84(20), F.S.]

Related Party activities

- Coalition is prohibited from entering into contracts in excess of \$25,000 without prior approval from OEL when the contract is with Coalition employees, Coalition governing board members, or relatives of either group.
- Such contracts (in excess of \$25,000) are required to be presented to the Coalition governing board for a vote.
 - A valid vote of approval requires a two-thirds vote by the governing board.
 - The impacted individual must complete the necessary conflict of interest disclosure forms.
 - Any governing board member(s) benefitting from the contract(s) must disclose in advance the conflict of interest and must abstain from the vote process.
- Coalition is allowed to enter into contracts below \$25,000 without prior approval from OEL when the contract is with Coalition employees, Coalition governing board members, or relatives of either group.
- Such contracts (below \$25,000) are required to be presented to the Coalition governing board for a vote.
 - A valid vote of approval requires a two-thirds vote by the governing board.
 - Impacted individual must complete the necessary conflict of interest disclosure forms.
 - Any governing board member(s) benefitting from the contract(s) must disclose in advance the conflict of interest and must abstain from the vote process.

- Such contracts (below \$25,000) are required to be reported to OEL within 30 days after approval by the Coalition governing board is obtained.

B. Requirements for bid and competitive proposals [45 CFR Part 75.329]

Verify procurement files include all of the following items.

- Public notice
- Copy of RFP
 - Technical Requirements
 - Statement of Work
 - Cost Requirements
 - Evaluation Criteria
- Proposals Submitted
- Evaluation of Proposals
- Board Approval of Contracts (as applicable)
- Contract Negotiations (*if different than proposed price*)
- Award of contract to lowest bidder who met the technical requirements/specifications

C. Requirements for small purchases [45 CFR Part 92.36(f); 45 CFR Part 75.439(b)(2); 45 CFR Part 75.302(b)(3)]

Verify files include all of the following items.

- Prior approval for equipment purchases in excess of the lesser of (1) \$5,000 or (2) the Coalition's approved capitalization threshold
- Documentation of small purchase transactions by one or more of the following items.
 - a. Sales receipt
 - b. Current catalogs
 - c. Formal quote
- Files indicate the Coalition obtained price or rate quotations from an adequate number of qualified sources.
 - a. Review documentation of written or telephone quotes
 - b. Determine if documentation is adequate and the number of quotes obtained is sufficient in accordance with Coalition policies and procedures

Micro-purchase transactions* (*up to \$2,500.00 for OEL transactions)

- Should comply with good purchasing practices per state purchasing guidance.

D. Requirements for professional services [2 CFR part 200.459]

To help determine allowability of these costs, Coalition files will document -

- The nature and scope of the service rendered in relation to the service required;
- The need to contract for the service, considering the Coalition's capability in the particular area;
- The past pattern of such costs, particularly in the years prior to Federal awards;
- The impact of Federal awards on the non-Federal Coalition's business (*i.e.*, what new problems have arisen), if applicable;
- Whether the decision is business-based and not made just because grant monies are available to fund the cost (instead of other Coalition revenues);
- If the service can be performed more economically by direct employment rather than contracting;
- The qualifications of the individual or concern rendering the service and the customary fees charged, especially on non-federally funded activities; and
- Adequacy of the contractual agreement for the service (*e.g.*, description of the service, estimate of time required, rate of compensation, and termination provisions).
- In addition, retainer fees must be supported by evidence of bona fide services available or rendered.

E. Required contents for Procurement files [DMS State Purchasing Memo No. 01 (2012-13); State Purchasing, Ch. 60A-1, FAC, s. 216.3474, F.S.; FDOE Contract Training Manual]

1. Planning/procurement files must obtain/document the following elements.

- a. Purchase order must have at least three written quotes or written records of telephone quotes;*
- b. At least one quote should be from a CMBE or else document why this quote was not obtained; *
- c. Cost analysis is required, since a competitive process won't be used for most small dollar purchases;*

- d. Rationale for method of procurement;
 - e. Selection of contract type;
 - f. Contractor selection or rejection; and
 - g. The basis for the contract price.
2. Purchase orders, contracts or other agreement files must obtain/document the following elements.
- a. Quantity, description, price, applicable payment terms, applicable discount(s), date of performance, transportation/shipping arrangements, and other pertinent information.
 - b. Additional purchase order terms/disclosures, required regardless of the scoped goods/services.
 - 1) Liquidated damages/financial consequences
 - 2) Payment audit (records of costs will be available upon request)
 - 3) Payment made after written “agency” acceptance
 - 4) Payment timeframe – timely payments
 - 5) Funding availability/annual appropriation
 - 6) No lobbying
 - 7) Public access/public records
 - 8) Conduct of business – federal/state laws govern
 - 9) Conflict of interest/related party activities
 - 10) Confidentiality and safeguarding information
 - c. Other/additional terms may also apply based on scoped goods/services.
 - d. If credit card transactions occur all the standards noted here will still apply.

F. Additional federal considerations [2 CFR Part 200.326; 2 CFR Part 200 Appendix II]

For transactions funded by federal programs, additional disclosures are required regardless of scoped/services.

- a. Debarment and suspension provision(s).
- b. Equal Employment Opportunity provision.
- c. Other/additional terms may also apply based on scoped goods/services.

G. Requirements for sole source or other non-competitive proposals [45 CFR Parts 75.329(f) and 75.332; s. 216.3475, F.S.]

- Documentation of the Coalition’s determination criteria for a sole-sourced transaction.
 - The item is only available from one single source;
 - The public emergency precludes delay resulting from competitive solution (for example, a flood at a local Coalition administrative office or large local service provider requires the immediate acquisition of additional services);
 - OEL or USDHHS gave written authorization for non-competitive proposals; and
 - After solicitation of a number of sources, competition is determined inadequate.
- Cost analysis, (i.e., verifying the proposed scope of work or goods/services data and the evaluation of the specific elements of costs and negotiating profit (if applicable)) is required. *Note: Grant rules state this is a mandatory task for sole source procurement. A cost/price analysis should be completed by staff prior to receiving any bid or fee information.*

H. Procurement files – required retention instructions [2 CFR Parts 200.333 - .336]

1. All records must be maintained for five (5) years after the impacted program year, if “closed.”
2. Records retention schedules apply regardless of the physical format of the Coalition records.
3. Wherever practicable records should be collected, transmitted and/or stored in open and machine readable formats.
4. Federal and state awarding agencies have the right to access any documents pertinent to federal/state awards.
5. The Coalition shall comply with the records retention requirements in Florida. The General Records Schedule GS1-SL for State and Local Government Agencies is located at:
<http://dos.myflorida.com/library-archives/records-management/general-records-schedules/>.



Early Learning Coalition of Southwest Florida

Policy: I-PO-I16	Capitalized Assets and Inventory Requirements	Revision Date:	January 19, 2017
Effective Date:	January 25, 2017	Board Approval Date:	January 25, 2017

CAPITALIZED ASSETS AND INVENTORY REQUIREMENTS

The Coalition staff, and sub-recipient staff, is responsible for the safeguarding of financial and physical assets and being alert to possible exposures, errors, and irregularities. The Coalition, and sub-recipient(s), are required to:

- maintain an accurate inventory control of non-expendable, tangible real property
- record the acquisition of new property
- document the transfer of property from one location to another
- provide documentation when property is being repaired
- complete physical inventories as required by law
- alert management when property is missing or suspected stolen
- obtain approval prior to disposing of property
- ensure that unauthorized use of property is prohibited

CAPITALIZED ASSETS

Capitalization Threshold

The Coalition's capitalization threshold is any item that was either purchased for \$5,000 or more or was contributed to the Coalition with a fair market value of \$5,000 or more, and has a useful life of at least one (1) year.

Capitalized Assets - Purchased

Items with unit costs below the Coalition's capitalization threshold shall be expensed in the year purchased. Capitalized assets are accounted for at their historical cost and all such assets, except land, are subject to depreciation over their estimated useful lives, as described within these policies.

If an awarding agency requires a lower capitalization threshold, the Coalition will adhere to that dollar amount only for that program or contract.

Capitalized assets will be reported as expensed for grants if they were so budgeted in the grant application. However, for the Coalition's financial statements, these assets will be capitalized and depreciated according to these policies.

Capitalized Assets – Contributed

Assets with fair market values in excess of the Coalition's capitalization threshold that are contributed to the Coalition, or a sub-recipient for the Coalition, shall be capitalized as fixed assets on the financial statements. Contributed items with market values below the Coalition's capitalization threshold shall be expensed in the year contributed.

Capitalized contributed assets are accounted for at their market value at the time of donation and all such assets, except land and certain works of art and historical treasures, are subject to depreciation over their estimated useful lives, as described within these policies.

Capitalized Assets - Depreciation and Useful Lives

All capitalized assets are maintained in the special property account group and are not included as an operating expense. Property is depreciated over its estimated useful lives using the straight-line method, half-year convention.

Recovery periods are as follows:

1. 5-year property:
 - Computers and peripheral equipment
 - Office machinery (such as typewriters, calculators, and copiers)
 - Vehicles
2. 7-year property:
 - Office furniture and fixtures (such as desks, files, and safes)
 - Any property that does not have a recovery period as designated by the IRS
3. Any other property will follow the IRS guidelines on length of recovery period
4. Alternatively, at the direction of the Finance Manager capitalized assets may be depreciated over useful lives expressed in terms of units of production or hours of service in place of the preceding useful lives expressed in terms of time.

Residual value of capitalized assets shall be determined by the Accounting Department in conjunction with the department or employee that shall utilize the asset.

For accounting and interim financial reporting purposes, depreciation expense will be recorded on an annual basis.

Capitalized Assets - Changes in Estimated Useful Lives

If it becomes apparent that the useful life of a particular capitalized asset will be less than the life originally established, an adjustment to the estimated useful life shall be made. All such changes in estimated useful lives of capitalized assets must be approved by the Finance Manager.

When a change in estimated useful life is made, the new life is used for purposes of calculating annual depreciation expense. In the year in which the change in estimate is made, the cumulative effect of the change shall be reflected as depreciation expense in the Coalition's statement of activities.

For example, if in the fourth year of an asset's life, it is determined that the asset will last five years instead of the original estimate of seven years, depreciation expense for that year shall be equal to the difference between 4/5 of the asset's basis (accumulated depreciation at the end of year four) and 3/7 of the asset's basis (accumulated depreciation at the beginning of the year).

Capitalized Assets - Repairs

Expenditures to repair capitalized assets shall be expensed as incurred if the repairs do not materially add to the value of the property or materially prolong the estimated useful life of the property.

Expenditures to repair capitalized assets shall be capitalized if the repairs increase the value of property, prolong its estimated useful life, or adapt it to a new or different use. Such capitalized repair costs shall be depreciated over the remaining estimated useful life of the property. If the repairs significantly extend the estimated useful life of the property, the original cost of the property shall also be depreciated over its new, extended useful life.

Capitalized Assets - Establishment and Maintenance of a Fixed Asset Listing

All capitalized property shall be recorded on the Fixed Asset Listing Report. This report shall include the following information with respect to each asset:

1. Date of acquisition
2. Unit acquisition cost (computed by including freight, insurance, and any other shipping costs divided by number of units)
3. Description (such as color, name, make, model, manufacturer and serial number or other identification number)
4. Depreciation method
5. Estimated useful life
6. Book Value
7. Depreciation amount
8. Residual value of asset

INVENTORY REQUIREMENTS

Items to be Inventoried

All nonexpendable property (as listed below), purchased by the Coalition, or a sub-recipient of the Coalition, are to be maintained, safeguarded, inventoried and accounted for:

- Equipment, fixtures, or other tangible personal property of a non-consumable and nonexpendable nature, with a value or cost of \$1,000.00 or more and a normal life expectancy life of one (1) year or more
- Portable or attractive items such as computers which may contain sensitive or confidential information (However, if they were under the cost threshold at time of acquisition, these items may be inventoried and accounted for by a means other than the official inventory report.)

Inventory Procedures

The Coalition, and sub-recipient(s), are required to adhere to these policies and procedures when establishing and maintaining the Property Inventory Reports, and per the following regulations as appropriate; Chapter 69I-73, FAC, Chapter 274, F.S., and 45 CFR Part 75.

When tangible property is purchased from combined federal and state funding, the more restrictive requirements apply.

Inventory Maintenance and Reporting Procedures

All property that is required to be recorded on the Property Inventory Report shall include the following information with respect to each item:

1. Date of acquisition
2. Unit acquisition cost (computed by including freight, insurance, and any other shipping costs divided by number of units)
3. Method of acquisition (and if purchased; voucher, check, or warrant number)
4. Description (such as color, name, make, year, model name/number, manufacturer, and a serial number or other identification number)
5. Funding source of the property, including the grant award number and other cost accumulator (OCA)
6. A statement that the title vests in the Coalition
7. Information to calculate the Federal share of the cost of the property, if applicable
8. Physical location of property and use
9. Name of custodian
10. Property tag identification number
11. Date that the item was last inventoried and the condition of the item as of that date, using the appropriate condition code as described here:

- (E) Excellent: The item is in excellent serviceable condition.
 - (G) Good: The item is in reusable and serviceable condition.
 - (F) Fair: The item is worn but is in reusable condition and can be cleaned, polished, and placed back in use with minimum repair or maintenance.
 - (P) Poor: The item is very worn, old, or obsolete and requires major repairs before use. This type of grant-purchased property may have parts, which may be useful.
 - (S) Scrap: The item is not usable by the Coalition. The item is obsolete or non-repairable, unserviceable, and may present a health or safety hazard.
12. Ultimate Disposition Data, including date of disposal and sales price (if applicable), **OR** the method used to determine current fair market value *where* a recipient compensates the awarding agency for its share. When determining fair market value, the Coalition will use a comparison of recent purchase prices of similar item(s) and/or the written opinions of applicable professionals.

Inventory Maintenance and Reporting Procedures for Sub-recipients

1. The sub-recipient must be granted Coalition prior approval for all items that are included in the “Contractor Prior Approval Guidance” issued by the Coalition.
2. The sub-recipient must assign a Property Custodian. The Property Custodian will be entrusted with five Coalition tag number decals, at a time, for assignment and placement, and will be responsible for maintaining the Coalition’s Property Inventory Report, as it pertains to the sub-recipient (actual property in sub-recipient’s custody).
3. The Property Custodian will review copies of the vendor invoices to ensure all purchases requiring inventory recording are added to the Coalition Property Inventory Report.
4. All purchases that require inventory recording will then be highlighted (or indicated in another agreed-upon manner) on the vendor invoice and added to the Coalition’s Property Inventory Report.
5. As property is purchased, the Property Custodian will submit to the Coalition an updated Coalition Property Inventory Report, corresponding vendor invoices w/highlights, and references and/or copies of all corresponding Coalition prior approvals.
6. The Property Custodian will request additional tag number decals, from the Coalition, as needed.
7. The Property Custodian is responsible for internal inventory relocation reporting, to ensure the Coalition Property Inventory Report is kept current.
8. The Property Custodian will perform annual physical inventories, of all operating sites, with Coalition staff by **September 1** of each fiscal year, unless the Sub-recipient/Coalition contract is ending in the current fiscal year.
9. **If the contract ends June 30 of the current fiscal year**, the annual physical inventories must be completed with Coalition staff **by May 31** in preparation for transition activities. In addition, **ALL** equipment and furniture purchases for the remainder of the contract would require Coalition Prior Approval.
10. In the case of a unilateral contract termination, no equipment or furniture purchased (from the date of notification) will be reimbursed by the Coalition.
11. If, at any time, property is missing or thought to have been stolen, the Property Custodian must alert the Coalition immediately.
12. Before disposing of any Coalition property, the Property Custodian must contact the Coalition and follow OEL policy. Final disposition will be updated on the Coalition Inventory Report.

CAPITALIZED ASSETS AND INVENTORY REQUIREMENTS

Property Purchased With Federal Funds

The Coalition may occasionally purchase property that will be used exclusively on a program funded by a Federal agency. Property charged to Federal awards will be subject to certain additional policies as described in this policy.

All applicable purchases of “property” with Federal funds shall have prior approval, in advance and in writing, by the Federal awarding agency and per Federal awarding agency’s prior approval process. In addition, the following policies shall apply regarding property purchased and charged to Federal awards:

1. Adequate insurance coverage will be maintained with respect to property charged to Federal awards.
2. For property (or residual inventories of supplies) with a remaining per unit fair market value of less than the Coalition's capitalization threshold at the conclusion of the award, the Coalition shall retain the property without any requirement for notifying the Federal agency.
3. If the remaining per unit fair market value is more than the Coalition's capitalization threshold, the Coalition shall gain a written understanding with the Federal agency regarding disposition of the property. This understanding may involve returning the property to the Federal agency, keeping the property and compensating the Federal agency, or selling the property and remitting the proceeds, less allowable selling costs, to the Federal agency.
4. The Grants and Operations Manager shall determine whether a specific award with a Federal agency includes additional property requirements or thresholds and requirements that differ from those described above.
5. A physical inventory of all property purchased with Federal funds shall be performed annually. The results of the physical inventory shall be reconciled to the accounting records of and Federal reports filed by the Coalition.

Physical Inventory

A physical inventory of all capitalized assets and inventoried property will be taken on an annual basis by the Coalition, as well as whenever there is a change of custodian. The Coalition must provide the updated Master Property Inventory List to OEL no later than **October 1** of each year or **within 30 days** of a change in custodian. All serial numbers and Coalition-assigned tag numbers will be double-checked for accuracy. This physical inventory shall be reconciled to the Fixed Asset Listing and the Property Inventory Report and adjustments made as necessary. All adjustments resulting from this reconciliation will be approved by the Finance Manager, and the fixed asset detail will be reconciled to the general ledger.

Purchases of Shared Assets/Inventoried Property

If the Coalition agrees to share its assets or inventoried property with another coalition, through a common contractor/sub-recipient, the coalition with whom the title vests must be established and agreed upon before purchase. In addition, full disclosure of any shared purchase/allocation must be provided with the Coalition's invoice.

Receipt of Newly-Purchased Property

At the time of arrival, all newly-purchased property shall be examined for obvious physical damage. If an item appears damaged or is not in working order, it shall be returned to the vendor immediately.

In addition, descriptions and quantities of items per the packing slip or bill of lading shall be compared to the items delivered. Discrepancies should be resolved with the vendor immediately.

Staff who receives shipments must verify the receipt and inspection of all goods by signing and dating the vendors' packing slips, as well as making any corrective notations on the packing slip when applicable.

Use of Equipment

Disclosures related to the use of equipment are mandated by uniform grant guidance [45 CFR Part 75.320(c), Use of equipment].

- Equipment is used by the funding program/project as long as needed;
- If there's extra capacity available, use the equipment for other partnering programs/projects;
- If used for other programs/projects any related usage fees must equal those charged by other private companies for the same equipment; and
- If new equipment is needed, current equipment may be sold or used for trade-in negotiations to offset newer equipment costs (subject to OEL prior approval).

Maintenance Procedures and Safeguards of Equipment

Federal regulations require that the custodian implement adequate procedures to ensure the equipment is kept in good condition and safeguards to prevent loss, damage, or theft of the property.

The Coalition uses the following three steps as a general guideline to ensure proper maintenance and safeguarding of equipment items have been performed:

- (1) Review all items purchased with federal and state funds to determine whether they are in good condition.
- (2) Provide maintenance services to items identified as not in good condition.
- (3) Initiate a disposition process for those items that are not usable or unable to repair.

In addition, the Coalition ensures preventative measures are taken such as I.T. equipment maintained by the coalition's I.T. vendor on a regular basis, adequately securing equipment to mitigate risk of theft, and instructing staff on proper use of equipment.

Note: Leased equipment (such as copiers, printers, etc.) are not listed on inventory reports, but are maintained per the lease agreement.

Transfer of Property and Property Records

The inventory custodian must document the transfer of grant-purchased property from one office to another, or from one location to another within the same Coalition. This is done by updating the new physical location on the Master Property Inventory List and the Property Tag Assignment records.

Disposition of Property

The Coalition Board of Directors approves the disposal of all capitalized fixed assets and inventoried property that may be worn out, obsolete, or no longer needed for the original project or program.

Priority for Disposition

When disposing of property, the custodian must use the equipment in connection with its other federally-sponsored activities, if any, in the following order of priority:

- (1) Programs, projects or activities the Health and Human Services (HHS) awarding agency sponsors.
- (2) Programs, projects or activities other HHS awarding agencies sponsor.
- (3) Programs, projects or activities other federal agencies sponsor.

Effective July 1, 2015, all equipment items in excess of \$5,000 proposed to be disposed must obtain OEL written prior approval [45 CFR Part 75.320(e)(2), Disposition].

Recording and Reporting of Disposed Items

If an item is sold, scrapped, donated or stolen, adjustments need to be made to the Fixed Asset Listing and Property Inventory Report after following prescribed applicable awarding agency instructions. If money is received for the item, then the difference between the money received and the "book value" (purchase price less depreciation) of the item will be recorded as a loss (if the money received is less than the book value) or a gain (if the money received is more than the book value).

Note: Per FS 274.07, after each annual physical inventory, all disposition documents must be board approved. After approval (and upon actual disposition of the item), the individual property record for each item lawfully disposed of must be transferred to a disposed property file. The inactive surplus disposed property file must then be maintained for at least five years after the date of disposition.

Write-Offs of Property

Any and all items that are discovered to be missing or stolen must be reported immediately to the Coalition, who will then notify and follow the procedures of the awarding agency. After following all required processes, the Coalition will remove items off the accounting records that are no longer in the Coalition's (or sub-recipient's) custody.



Early Learning Coalition of Southwest Florida

Policy: I-PO-I16	Capitalized Assets and Inventory Requirements	Revision Date:	January 19, 2017
Effective Date:	January 25, 2017	Board Approval Date:	January 25, 2017

CAPITALIZED ASSETS AND INVENTORY REQUIREMENTS

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If an awarding agency requires a lower capitalization threshold, the Coalition will adhere to that dollar amount only for that program or contract.

Capitalized assets will be reported as expensed for grants if they were so budgeted in the grant application. However, for the Coalition's financial statements, these assets will be capitalized and depreciated according to these policies.

Capitalized Assets – Contributed

Assets with fair market values in excess of the Coalition's capitalization threshold that are contributed to the Coalition, or a sub-recipient for the Coalition, shall be capitalized as fixed assets on the financial statements. Contributed items with market values below the Coalition's capitalization threshold shall be expensed in the year contributed.

Capitalized contributed assets are accounted for at their market value at the time of donation and all such assets, except land and certain works of art and historical treasures, are subject to depreciation over their estimated useful lives, as described within these policies.

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Recovery periods are as follows:

1. 5-year property:
 - Computers and peripheral equipment
 - Office machinery (such as typewriters, calculators, and copiers)
 - Vehicles
2. 7-year property:
 - Office furniture and fixtures (such as desks, files, and safes)
 - Any property that does not have a recovery period as designated by the IRS
3. Any other property will follow the IRS guidelines on length of recovery period
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Residual value of capitalized assets shall be determined by the Accounting Department in conjunction with the department or employee that shall utilize the asset.

For accounting and interim financial reporting purposes, depreciation expense will be recorded on an annual basis.

Capitalized Assets - Changes in Estimated Useful Lives

If it becomes apparent that the useful life of a particular capitalized asset will be less than the life originally established, an adjustment to the estimated useful life shall be made. All such changes in estimated useful lives of capitalized assets must be approved by the Finance Manager.

When a change in estimated useful life is made, the new life is used for purposes of calculating annual depreciation expense. In the year in which the change in estimate is made, the cumulative effect of the change shall be reflected as depreciation expense in the Coalition's statement of activities.

For example, if in the fourth year of an asset's life, it is determined that the asset will last five years instead of the original estimate of seven years, depreciation expense for that year shall be equal to the difference between 4/5 of the asset's basis (accumulated depreciation at the end of year four) and 3/7 of the asset's basis (accumulated depreciation at the beginning of the year).

Capitalized Assets - Repairs

Expenditures to repair capitalized assets shall be expensed as incurred if the repairs do not materially add to the value of the property or materially prolong the estimated useful life of the property.

Expenditures to repair capitalized assets shall be capitalized if the repairs increase the value of property, prolong its estimated useful life, or adapt it to a new or different use. Such capitalized repair costs shall be depreciated over the remaining estimated useful life of the property. If the repairs significantly extend the estimated useful life of the property, the original cost of the property shall also be depreciated over its new, extended useful life.

Capitalized Assets - Establishment and Maintenance of a Fixed Asset Listing

All capitalized property shall be recorded on the Fixed Asset Listing Report. This report shall include the following information with respect to each asset:

1. Date of acquisition
2. Unit acquisition cost (computed by including freight, insurance, and any other shipping costs divided by number of units)
3. Description (such as color, name, make, model, manufacturer and serial number or other identification number)
4. Depreciation method
5. Estimated useful life
6. Book Value
7. Depreciation amount
8. Residual value of asset

INVENTORY REQUIREMENTS

Items to be Inventoried

All nonexpendable property (as listed below), purchased by the Coalition, or a sub-recipient of the Coalition, are to be maintained, safeguarded, inventoried and accounted for:

- Equipment, fixtures, or other tangible personal property of a non-consumable and nonexpendable nature, with a value or cost of \$1,000.00 or more and a normal life expectancy life of one (1) year or more
- Portable or attractive items such as computers which may contain sensitive or confidential information (However, if they were under the cost threshold at time of acquisition, these items may be inventoried and accounted for by a means other than the official inventory report.)

Inventory Procedures

The Coalition, and sub-recipient(s), are required to adhere to these policies and procedures when establishing and maintaining the Property Inventory Reports, and per the following regulations as appropriate; Chapter 69I-73, FAC, Chapter 274, F.S., and 45 CFR Part 75.

When tangible property is purchased from combined federal and state funding, the more restrictive requirements apply.

Inventory Maintenance and Reporting Procedures

All property that is required to be recorded on the Property Inventory Report shall include the following information with respect to each item:

1. Date of acquisition
2. Unit acquisition cost (computed by including freight, insurance, and any other shipping costs divided by number of units)
3. Method of acquisition (and if purchased; voucher, check, or warrant number)
4. Description (such as color, name, make, year, model name/number, manufacturer, and a serial number or other identification number)
5. Funding source of the property, including the grant award number and other cost accumulator (OCA)
6. A statement that the title vests in the Coalition
7. Information to calculate the Federal share of the cost of the property, if applicable
8. Physical location of property and use
9. Name of custodian
10. Property tag identification number
11. Date that the item was last inventoried and the condition of the item as of that date, using the appropriate condition code as described here:

- (E) Excellent: The item is in excellent serviceable condition.
 - (G) Good: The item is in reusable and serviceable condition.
 - (F) Fair: The item is worn but is in reusable condition and can be cleaned, polished, and placed back in use with minimum repair or maintenance.
 - (P) Poor: The item is very worn, old, or obsolete and requires major repairs before use. This type of grant-purchased property may have parts, which may be useful.
 - (S) Scrap: The item is not usable by the Coalition. The item is obsolete or non-repairable, unserviceable, and may present a health or safety hazard.
12. Ultimate Disposition Data, including date of disposal and sales price (if applicable), **OR** the method used to determine current fair market value *where* a recipient compensates the awarding agency for its share. When determining fair market value, the Coalition will use a comparison of recent purchase prices of similar item(s) and/or the written opinions of applicable professionals.

Inventory Maintenance and Reporting Procedures for Sub-recipients

1. The sub-recipient must be granted Coalition prior approval for all items that are included in the “Contractor Prior Approval Guidance” issued by the Coalition.
2. The sub-recipient must assign a Property Custodian. The Property Custodian will be entrusted with five Coalition tag number decals, at a time, for assignment and placement, and will be responsible for maintaining the Coalition’s Property Inventory Report, as it pertains to the sub-recipient (actual property in sub-recipient’s custody).
3. The Property Custodian will review copies of the vendor invoices to ensure all purchases requiring inventory recording are added to the Coalition Property Inventory Report.
4. All purchases that require inventory recording will then be highlighted (or indicated in another agreed-upon manner) on the vendor invoice and added to the Coalition’s Property Inventory Report.
5. As property is purchased, the Property Custodian will submit to the Coalition an updated Coalition Property Inventory Report, corresponding vendor invoices w/highlights, and references and/or copies of all corresponding Coalition prior approvals.
6. The Property Custodian will request additional tag number decals, from the Coalition, as needed.
7. The Property Custodian is responsible for internal inventory relocation reporting, to ensure the Coalition Property Inventory Report is kept current.
8. The Property Custodian will perform annual physical inventories, of all operating sites, with Coalition staff by **September 1** of each fiscal year, unless the Sub-recipient/Coalition contract is ending in the current fiscal year.
9. **If the contract ends June 30 of the current fiscal year**, the annual physical inventories must be completed with Coalition staff **by May 31** in preparation for transition activities. In addition, **ALL** equipment and furniture purchases for the remainder of the contract would require Coalition Prior Approval.
10. In the case of a unilateral contract termination, no equipment or furniture purchased (from the date of notification) will be reimbursed by the Coalition.
11. If, at any time, property is missing or thought to have been stolen, the Property Custodian must alert the Coalition immediately.
12. Before disposing of any Coalition property, the Property Custodian must contact the Coalition and follow OEL policy. Final disposition will be updated on the Coalition Inventory Report.

CAPITALIZED ASSETS AND INVENTORY REQUIREMENTS

Property Purchased With Federal Funds

The Coalition may occasionally purchase property that will be used exclusively on a program funded by a Federal agency. Property charged to Federal awards will be subject to certain additional policies as described in this policy.

All applicable purchases of “property” with Federal funds shall have prior approval, in advance and in writing, by the Federal awarding agency and per Federal awarding agency’s prior approval process. In addition, the following policies shall apply regarding property purchased and charged to Federal awards:

1. Adequate insurance coverage will be maintained with respect to property charged to Federal awards.
2. For property (or residual inventories of supplies) with a remaining per unit fair market value of less than the Coalition's capitalization threshold at the conclusion of the award, the Coalition shall retain the property without any requirement for notifying the Federal agency.
3. If the remaining per unit fair market value is more than the Coalition's capitalization threshold, the Coalition shall gain a written understanding with the Federal agency regarding disposition of the property. This understanding may involve returning the property to the Federal agency, keeping the property and compensating the Federal agency, or selling the property and remitting the proceeds, less allowable selling costs, to the Federal agency.
4. The Grants and Operations Manager shall determine whether a specific award with a Federal agency includes additional property requirements or thresholds and requirements that differ from those described above.
5. A physical inventory of all property purchased with Federal funds shall be performed annually. The results of the physical inventory shall be reconciled to the accounting records of and Federal reports filed by the Coalition.

Physical Inventory

A physical inventory of all capitalized assets and inventoried property will be taken on an annual basis by the Coalition, as well as whenever there is a change of custodian. The Coalition must provide the updated Master Property Inventory List to OEL no later than **October 1** of each year or **within 30 days** of a change in custodian. All serial numbers and Coalition-assigned tag numbers will be double-checked for accuracy. This physical inventory shall be reconciled to the Fixed Asset Listing and the Property Inventory Report and adjustments made as necessary. All adjustments resulting from this reconciliation will be approved by the Finance Manager, and the fixed asset detail will be reconciled to the general ledger.

Purchases of Shared Assets/Inventoried Property

If the Coalition agrees to share its assets or inventoried property with another coalition, through a common contractor/sub-recipient, the coalition with whom the title vests must be established and agreed upon before purchase. In addition, full disclosure of any shared purchase/allocation must be provided with the Coalition's invoice.

Receipt of Newly-Purchased Property

At the time of arrival, all newly-purchased property shall be examined for obvious physical damage. If an item appears damaged or is not in working order, it shall be returned to the vendor immediately.

In addition, descriptions and quantities of items per the packing slip or bill of lading shall be compared to the items delivered. Discrepancies should be resolved with the vendor immediately.

Staff who receives shipments must verify the receipt and inspection of all goods by signing and dating the vendors' packing slips, as well as making any corrective notations on the packing slip when applicable.

Use of Equipment

Disclosures related to the use of equipment are mandated by uniform grant guidance [45 CFR Part 75.320(c), Use of equipment].

- Equipment is used by the funding program/project as long as needed;
- If there's extra capacity available, use the equipment for other partnering programs/projects;
- If used for other programs/projects any related usage fees must equal those charged by other private companies for the same equipment; and
- If new equipment is needed, current equipment may be sold or used for trade-in negotiations to offset newer equipment costs (subject to OEL prior approval).

Maintenance Procedures and Safeguards of Equipment

Federal regulations require that the custodian implement adequate procedures to ensure the equipment is kept in good condition and safeguards to prevent loss, damage, or theft of the property.

The Coalition uses the following three steps as a general guideline to ensure proper maintenance and safeguarding of equipment items have been performed:

- (1) Review all items purchased with federal and state funds to determine whether they are in good condition.
- (2) Provide maintenance services to items identified as not in good condition.
- (3) Initiate a disposition process for those items that are not usable or unable to repair.

In addition, the Coalition ensures preventative measures are taken such as I.T. equipment maintained by the coalition's I.T. vendor on a regular basis, adequately securing equipment to mitigate risk of theft, and instructing staff on proper use of equipment.

Note: Leased equipment (such as copiers, printers, etc.) are not listed on inventory reports, but are maintained per the lease agreement.

Transfer of Property and Property Records

The inventory custodian must document the transfer of grant-purchased property from one office to another, or from one location to another within the same Coalition. This is done by updating the new physical location on the Master Property Inventory List and the Property Tag Assignment records.

Disposition of Property

The Coalition Board of Directors approves the disposal of all capitalized fixed assets and inventoried property that may be worn out, obsolete, or no longer needed for the original project or program.

Priority for Disposition

When disposing of property, the custodian must use the equipment in connection with its other federally-sponsored activities, if any, in the following order of priority:

- (1) Programs, projects or activities the Health and Human Services (HHS) awarding agency sponsors.
- (2) Programs, projects or activities other HHS awarding agencies sponsor.
- (3) Programs, projects or activities other federal agencies sponsor.

Effective July 1, 2015, all equipment items in excess of \$5,000 proposed to be disposed must obtain OEL written prior approval [45 CFR Part 75.320(e)(2), Disposition].

Recording and Reporting of Disposed Items

If an item is sold, scrapped, donated or stolen, adjustments need to be made to the Fixed Asset Listing and Property Inventory Report after following prescribed applicable awarding agency instructions. If money is received for the item, then the difference between the money received and the "book value" (purchase price less depreciation) of the item will be recorded as a loss (if the money received is less than the book value) or a gain (if the money received is more than the book value).

Note: Per FS 274.07, after each annual physical inventory, all disposition documents must be board approved. After approval (and upon actual disposition of the item), the individual property record for each item lawfully disposed of must be transferred to a disposed property file. The inactive surplus disposed property file must then be maintained for at least five years after the date of disposition.

Write-Offs of Property

Any and all items that are discovered to be missing or stolen must be reported immediately to the Coalition, who will then notify and follow the procedures of the awarding agency. After following all required processes, the Coalition will remove items off the accounting records that are no longer in the Coalition's (or sub-recipient's) custody.



Early Learning Coalition of Southwest Florida

Policy: I-PO-G	Record Maintenance	Revision Date:	October 25, 2016
Effective Date:	January 25, 2017	Board Approval Date:	January 25, 2017

RECORD MAINTENANCE

The Coalition shall document activities related to SR and VPK implementation, including administrative and reporting responsibilities. Documentation shall be sufficient for an audit trail and compliance with federal regulation 2 CFR §200.333, *Retention requirements for records*. The Coalition shall maintain written or electronic documentation of transaction files, policies, processes, controls and other detailed supporting records that the Coalition submits per OEL instructions and makes available for review upon request. **The Coalition requires that its sub-recipients and subcontractors follow these same terms and conditions.**

(Note: Please find these in the “Policies and Procedures” folder located in the Coalition “Company Share” drive. Contact the Coalition Grants and Operations Manager should there be any difficulty in finding a policy.)

The formal records retention policy of the Coalition is as follows:

Permanent Files

Audit reports
 Chart of Accounts
 Contracts, mortgages, notes and leases still in effect
 Correspondence on legal and important matters only
 Deeds, mortgages and bills of sales
 Depreciation schedules
 Financial statements-Year End
 General ledgers/year end trial balance
 Insurance records (policies, claims, etc.)
 Journals
 Articles of Incorporation, bylaws and charters, board meeting minutes
 Property records
 Retirement and pension records
 Tax returns and worksheets, examination reports, and other documents relating to determination of income tax liability
 Trademark registrations and copyrights
 Training manuals (Coalition-created only)

All Other Coalition Records (non-permanent records)

All other (non-permanent) Coalition records are maintained for seven (7) fiscal years. This includes all OEL Reporting Deliverables as listed in the OEL Grant Agreement Exhibit VI *Listing of Reports*, ~~and~~ all (sub-recipient/subcontractor) performance monitoring deliverables as listed in the OEL Grant Agreement Exhibit II, Section D, item 6 *Performance Reporting*, and all closed procurement records.

Record Retention Requirements and Exceptions

All records must be maintained for *at least* five (5) years from the date of the last document filed for the period. For consistency, the Coalition maintains all non-permanent records for seven (7) years.

There are two exceptions:

- (1) If there is any litigation, audit, claim, negotiation, or other action that started before the expiration of the period. In that case, the records must be retained until resolution of all issues or until the end of the period, whichever is later.
- (2) If a sub-recipient/subcontractor chooses NOT to retain records longer than the minimum required by applicable law/regulation. (For example, the Coalition retains ALL non-permanent records for seven (7) years for simplicity although some records only require a five (5) year retention period.)

Coalition Record Destruction

The Coalition retains records as required by law and destroys them when appropriate. The destruction of records must be approved by the CEO, and logged into the Coalition's Destroyed Records Log.

Sub-recipient/Subcontractor Record Retention Requirements

All sub-recipient/subcontractor records must be maintained for *at least* five (5) years from the date of the last document filed for the period, and have the same requirements as the Coalition that are stated in this policy.

Records retained for client services related to enrollment/intake (aka Resource and Referral services) would include:

- Family Portal Account Information
- Child Care application and authorizations (referrals)
- DCF At-risk referral form (if applicable)
- OEL At-risk Domestic Violence Center/Homeless Program referral form (if applicable)
- Immunization records, family income data, purpose of care plan
- ELC-issued child care

Records retained for child eligibility, management of child care placements, and disenrollment:

- Eligibility record requirements are listed in the OEL Grant agreement, Exhibit II Section C item 6.1, *Child Eligibility*.
- Management of child care placement record requirements are listed in the OEL Grant agreement, Exhibit II Section C item 6.2, *Management of child care placements*.
- Disenrollment record requirements are listed in the OEL Grant agreement, Exhibit II Section C item 6.3 *Notification of disenrollment*.

Records retained for attendance and enrollment:

- ELC-issued child care certificate with defined/approved care level
- Enrollment and attendance certification
- Includes sign-in and sign-out documentation, VPK-03S or 03L forms, etc.
- Documentation to support excused absences
- Rilya Wilson Act requirements for at-risk children
- Proof of parent co-payments

Record retention requirements for provider payments, provider payment reconciliations, and improper payments are listed in the statewide SR provider contract Section VII, *Compensation and Funding*.



Early Learning Coalition of Southwest Florida

Procedure: Information Technology (Information Systems Security Program- ISSP)

Revision Date: March 4, 2016

Management Approval Date: March 16, 2016

Effective Date: April 1, 2016

The Information Systems of a Coalition affect the way transactions are initiated, authorized, recorded, processed, and reported upon. Controls for any Coalition generally consist of a combination of manual controls and automated (computerized) controls such as controls programmed within computer systems or software packages. The information technology functions of the organization include access to information resources of the Coalition and, in some cases, of external parties, such as OEL's statewide program databases (Enhanced Fields System (EFS) routinely accessed by the Coalition and its subrecipients.

The ELC shall document activities related to SR and VPK implementation, including administrative and reporting responsibilities. Documentation shall be sufficient for an audit trail and compliance with federal regulation 2 CFR §200.335, Methods for collection, transmission and storage of information and OEL Program Guidance 101.02, Records Confidentiality.

Staff Assignment of Responsibility for Information Technology	
CO	Chief Officers (Custodian)
DSA	Directors of Service Areas (Custodian's Delegate)
SSA	Supervisors of Service Areas (Custodian's Delegate)
IT	Information Technology Department (Custodian's Delegate)
HR	Human Resources (Custodian's Delegate)
IC	Information Custodian (any staff with access to Coalition's network and data)

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Definitions:

Access - The right to enter or make use of a computer system. To approach, view, instruct, communicate with, store data in, retrieve data from, or otherwise make use of computers or information resources.

Access Control - The enforcement of specified authorization rules based on positive identification of employees and the systems or data they are permitted to access.

Access Privilege (Privilege) - A specific activity that a user has been granted access to perform on an information resource (e.g., view or modify).

Account - A set of privileges for authorization to system access, which are associated with a user id.

Accreditation - A risk-based decision that determines whether an IT system should be allowed to operate under a particular security configuration. Accreditation is based on the facts, plans and schedules developed during Certification.

Administrative Access - Enhanced privilege level that allows the user to perform administration of the system.

ADS - Application and Data Services Support Services

Analog - A method of transmitting information in a continuous fashion via energy waves.

Antivirus Software - Software that searches for evidence of computer virus infection and attempts to remove the malicious code and repair any damage the virus caused.

Audit Trail - In computer security systems, a chronological record of system resource usage - This includes user login, file access, other various activities and whether any actual or attempted security violations occurred, legitimate and unauthorized.

Authentication - The process of verifying that an employee is who he or she purports to be. Techniques are usually broken down into three categories: (1) something the employee knows, such as a password or PIN; (2) something the employee has, such as a smartcard or ATM card; and (3) something that is part of the employee, such as a fingerprint or iris.

Authentication Token - A hardware device, the possession of which can be verified and which helps to confirm identity as part of the authentication process (e.g., smartcard, Secure ID).

Authorization - The formal granting of access to an individual to perform certain activities.

Availability - Assuring information and communications services will be ready for use when expected.

Awareness - A state of focused attention on security that allows individuals to recognize IT security concerns and respond accordingly.

Back Up - The process of copying data to alternative or redundant media.

Backup - A copy of data that is made in order to provide redundancy in case the original becomes corrupted or unavailable.

Breach of Security – Unauthorized access of data containing person information. Good faith access of personal information of an employee or agent of the Coalition does not constitute a breach of security, provided that the information is not used for a purpose unrelated to the contract or subject to further unauthorized use.

Brute Force Attack - attack where the attacker attempts to systematically “guess” a password or other secret by trying all possible values.

Business continuity - The degree to which an organization may achieve uninterrupted stability of systems and operational procedures

Certification - An assessment of the security controls of an information system.

Change Control - Documented procedures used to control the revision of applications, operating systems and hardware configurations in computing environments.

CIO - Chief Information Officer

Confidential - means refers to entire record systems, specific records or individually identifiable data that by law are not subject to public disclosure under Article I, Section 24 of the Florida Constitution and Chapter 119, F.S. When applicable, confidentiality covers all documents, papers, computer files, letters

and all other notations of records or data that are designed by law as confidential. Further, the term confidential also covers the verbal conveyance of data or information that is confidential.

Confidential Data/Information - Any data that is categorized as “confidential” under the Coalition’s information resource classification protocol and framework

Confidentiality - Assuring information will be kept secret, with access limited to appropriate persons.

Contingency Plan - Management protocol and procedures designed to maintain or restore business operations, including computer operations, possibly at an alternate location, in the event of emergencies, system failures, or disaster.

Continuity of Support Plan (COSP) - The documentation of a predetermined set of instructions or procedures mandated by the Office of Management and Budget (OMB) A-130 that describe how to sustain major applications and general support systems in the event of a significant disruption.

Continuity of Operations Plan (COOP) - A predetermined set of instructions or procedures that describe how the Coalition’s essential functions will be sustained for up to 30 days as a result of a disaster event before returning to normal operations.

Critical Data - Data which has been designated as “critical” under the Coalition’s Information Resource Classification protocol 5.05.02.02.

Critical Incident - An incident that could result in a severe impact to the Coalition resources if not addressed quickly.

Custodian - person to whom the custody of information has been delegated by the Coalition.

Custodian’s Delegate - person acting under the supervision of the custodian to whom the custody of information has been delegated by the custodian and, from whom the custodian receives custody receipts.

Data - A representation of facts or concepts in an organized manner in order that it may be stored, communicated, interpreted, or processed by automated means.

Database - An organized collection of logically related information stored together in one or more computerized files.

Designated Approving Authority (DAA) - The senior management official or executive with the authority to approve the operation of an information system at an acceptable level of risk to the Coalition operations (including mission, functions, image, or reputation), Coalition assets, or individuals

Disaster Recovery Plan (DRP) - A written plan for processing critical applications in the event of a major hardware or software failure or destruction of facilities.

Disruption/Disaster - An unplanned event that causes the system to be inoperable for an unacceptable length of time (e.g., minor or extended power outage, extended unavailable network, or equipment or facility damage or destruction).

Employee ID - Character string that uniquely identifies an employee or computer process.

Employees - Individuals employed by the Coalition in an established position in the Business Services, Quality Services and Program Services. For purposes of this policy, employees also include personal services contractors, consultants and experts hired on contract.

Encryption - The process of transforming readable text into unreadable text (cipher text) for the purpose of security or privacy. Data is encoded to prevent unauthorized access.

General Support Systems - An interconnected information resource under the same direct management control that shares common functionality. It normally includes hardware, software, information, data, applications, communications, facilities and people and provides support for a variety of users and applications. Individual applications support different mission-related functions. Users may be from the same or different organizations.

Identification - The process of determining who an employee claims to be; usually performed by presenting an employee ID (i.e., "jsmith").

Information Asset - An information resource that has tangible value

Information Custodians - Individuals (e.g., IT staff) who maintain or administer information resources on behalf of Information Owners. They are guardians or caretakers who are charged with the resource owner's requirements for processing, telecommunications, protection controls and output distribution for the resource.

Information owners - Individuals ultimately responsible for information resources, who are generally executive management, or designated senior managers. The initial owner is the individual who creates, or initiates the creation or storage of, information. Once information is created or stored, the individual's respective Coalition service area becomes the owner, with the executive management of that service area taking official responsibility. Acts as or appoints the Information Systems Security Officer for the service area.

Information resources - Equipment, facilities, software and data that are designed, built, operated and maintained to collect, record, process, store, retrieve, display and transmit information.

Information Technology Services Officer (ITSO) - Senior manager or member of executive staff responsible for developing, implementing and maintaining an ISSP for the Coalition.

IT Security Services Officer - IT Manager with additional responsibilities as deemed necessary by the Chief Information Officer

Information Security Training and Awareness Program - A program to maintain effective awareness of information security policy, standards and acceptable practices

Information Systems Security Program (ISSP) - The multiple components which comprise the 'program' aimed at protecting the confidentiality, integrity and availability of the Coalition information systems resources.

Information Users - Individuals who use or have access to Coalition's information resources, including employees, vendors and visitors.

ISDN - A type of communication line which can carry voice, digital network services and voice over internet protocol.

IT disaster - A sudden, significant event that may result in the loss or destruction of Coalition information and/or loss of service on the network used by Coalition associates

Integrity - Assuring information will not be accidentally or maliciously altered or destroyed. Information has integrity when it is timely, accurate, complete and consistent.

Least Privilege - Granting employees only the minimum privileges required to provide the level of access needed to perform their official duties.

Major Information System - An information system that requires special management attention because of its importance to the Coalition mission; high development, operating, or maintenance costs; or its significant role in the administration of Coalition programs, finances, property, or other resources.

Media - Physical objects on which data can be stored, such as hard drives, zip drives, floppy disks, compact disks, CD-ROMs, DVDs, flash drives and tapes.

Memorandum of Understanding (MOU) - A document providing a general description of the responsibilities that are to be assumed by two or more parties in their pursuit of some goal(s).

Mobile Computing Device – It is a laptop, PDA, or other portable device that can store or process data.

Modem - A device that enables a computer to transmit data over telephone lines by converting data between the computer's digital format and the phone line's analog format.

Password - Any secret string of characters which serves as authentication of a person's identity (personal password), or which may be used to grant or deny access to private or shared data (access password).

Personal Firewall - Software installed on a computer or device which helps protect that system against unauthorized access.

Personal Use - Activity that is conducted for purposes other than accomplishing official or otherwise authorized activity.

Personally Identifiable Information (PII) - PII means information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. Some information that is considered to be PII is available in public sources such as telephone books, Web sites, and university listings. This type of information is considered Public PII and includes for example, first and last name, address, work telephone number, and general educational credentials.

The definition of PII is not anchored to any single category of information or technology. Rather, it requires a case-by-case assessment of the specific risk that an individual can be identified. Non-PII can become PII whenever additional information is made publicly available, in any medium and from any source, that, when combined with other available information, could be used to identify an individual.

Protected Personally Identifiable Information (Protected PII or PPII) - Protected PII means an individual's first name or first initial and last name in combination with any one or more of types of information, including, but not limited to, social security number, passport number, credit card numbers, clearances, bank numbers, biometrics, date and place of birth, mother's maiden name, criminal medical and financial record and education transcripts. This definition does not include PII that is required by law to be disclosed.

Risk - The possibility of something adversely affecting the confidentiality, availability and integrity of Coalition's information resources.

Risk Assessment – It is the process of analyzing and interpreting risk. Risk assessment is used to identify security risks, examine threats to and vulnerabilities of systems, determine the magnitude of risks, identify areas needing safeguarding and determine the acceptability of risk.

Risk Management – It is the process of identifying, assessing and taking steps to reduce risk to an acceptable level. The risk management process allows the service area to balance the operational and economic costs of protective measures and achieve gains in mission capability by protecting the IT systems and data that support the Coalition's mission.

Remote Access – It is any access to the office network through a network, device, or medium that is not controlled by the Coalition (such as the Internet, public phone line, wireless carrier, or other external connectivity).

Restore - The process of copying data from a previously-made backup to the original (or an alternate) system.

Sanitization - To expunge data from storage media so that data recovery is impossible. The most common types of sanitization are destruction (e.g. burning or smashing), degaussing (i.e. demagnetizing) and overwriting.

Security Incident - Any activity that is a threat to the availability, integrity, or confidentiality of the Coalition's information resources, or any action that is in violation of this policy or it's implementing administrative orders.

Separation of Duties - Concept that provides the necessary checks and balances to mitigate against fraud, errors and omissions by ensuring no individual or function has control of the entire process.

Spam - Unauthorized and unsolicited electronic mass mailings.

Strong Authentication – It is an authentication process using techniques which would require a high level of effort to compromise. Strong authentication usually entails the use of multiple, integrated authentication techniques (factors), such as using both a token and a PIN number together.

System Administrator - A designated individual is given special privileges to maintain the operation of a computer application or system.

System Development Life Cycle - The system development life cycle (SDLC) starts with the initiation of the system planning process and continues through system acquisition/development, implementation, operations and maintenance and ends with disposition of the system.

System Permissions - The technical configuration that provides an individual the ability to perform certain actions on information resources.

Telephony - The technology associated with the electronic transmission of voice, fax, or other information between distant parties using systems historically associated with the telephone.

Threat - A circumstance, event, or person with the potential to cause harm to a system in the form of destruction, disclosure, data modification and/or Denial of Service (DoS).

Validation - The checking of data for correctness and/or for compliance with applicable standards, rules and conventions.

Verification - The process of ensuring information has not been changed in transit or in storage, either intentionally or accidentally.

Vulnerability - Any characteristic of a computer system that renders it susceptible to destruction or incapacitation. It is a design, administrative, or implementation weakness or flaw in hardware, firmware, or software that, if exploited (either intentionally or accidentally), could lead to an unacceptable impact in the form of unauthorized access to information or disruption of critical processing.

Vulnerability Testing - Systematic examination of a system to determine the adequacy of security measures, identify security deficiencies, provide data from which to predict the effectiveness of proposed security measures and confirm the adequacy of such measures after implementation.

User ID - Character string (i.e., logon name) that uniquely identifies a computer user.

5.02.29 Electronic Mail (IC)

Electronic mail is an essential tool used by ELC to conduct its business. Email is a vital method of exchanging messages and data files over computer networks.

However, email is inherently insecure and presents many risks to ELC information security. Email can be read, altered, or deleted by unknown parties without the permission of the person who sent or received the message. Email can also be used to distribute viruses and other harmful codes that pose a threat to ELC resources. Employees might also send inappropriate, proprietary, or other confidential information via email, thus exposing the ELC to legal action or damage to its reputation. After web servers, an organization's mail servers are typically the most frequent targets of attack.

Take prudent security precautions in administering and using email.

- A. Understand that email can be intercepted or altered without the knowledge of the sender or recipient when it is transferred over the Internet.
- B. Do not send confidential information over the Internet (via email or other means) without being encrypted.

- C. Encrypt confidential information when transferred outside of the ELC's network.
- D. Ensure data is adequately protected
- E. Send only official data via ELC-owned or operated email systems.
- F. Seek Management permission to use an alternate system in the case of an emergency.
- G. Do not forward ELC email or attachments to personal accounts managed by public email or Internet service providers where the information might be compromised.
- H. Prohibit employees from using any ELC email systems (or any other email systems accessed from ELC computers) for prohibited purposes
- I. Do not direct unauthorized or personal messages to the "All" ELC distribution group or other large groups of users.
- J. Delete emails once no longer needed.
- K. Archive old emails that must be retained from the email server on a periodic basis.
- L. Avoid potential damage caused by email-borne computer viruses by following:
 - Scan all incoming emails for viruses in accordance with the antivirus protocol in place at the agency hosting the ELC's email.
 - Do not open attachments or click on links in messages from senders they do not know.
 - Report all suspicious emails to the ITSO.
 - Filter and quarantine emails containing executable attachments from entering the ELC's host network.
 - Avoid using ELC email addresses for personal correspondence on the Internet, particularly if they do not know or have a trust relationship with the other party.
 - Minimize spam and avoid waste of ELC resources.
 - Avoid giving out one's official email address to Internet shopping sites, bulletin boards and mailing lists.
 - No expectation of privacy while using the ELC's email system.

5.05.02.00 IT Security Risk Mitigation Services (IT/HR)

The ELC Information Systems Security Program (ISSP) consists of a set of information security protocols, as well as standards, procedures and guidelines for their implementation.

These protocols are contained in the ELC Information Systems Security Program Handbook ("ISSP Handbook") which will be followed by all ELC employees, contract employees, vendors and others who do official business with ELC.

The ISSP Handbook is incorporated in this manual as a part of ELC policy for all employees.

- A. Educate ELC employees (and when necessary, individuals doing official business with the ELC) about information security and the protocols and procedures with which they must comply, by implementing an Information Security Training and Awareness Program.
- B. Include both periodic training classes as well as an ongoing security awareness campaign designed to maintain vigilance toward information security.
- C. Receive information security training within 30 days of employment start date as part of the orientation process.
- D. Include on-going education and continual reinforcement of the value of security

- E. Sign an agreement that they understand and will comply with the ELC's information security policies after training.
- F. Provide training to information users regarding the security policies and procedures for their specific systems.
- G. Integrate risk management into the ELC's decision-making and systems development life cycle.
- H. Conduct an annual review to determine any necessary changes to any portions of the ISSP policy.
- I. Route all changes for approval following the ELC policy approval process.

5.05.02.01 Acceptable Use of Information Resources (IC)

Inappropriate use of information resources exposes the ELC to risks including compromise of systems and services, legal issues, financial loss and damage to reputation. The purpose of this protocol is not to impose restrictions that are contrary to the ELC's established culture of openness, trust and integrity, but to protect the ELC's associates and the ELC from illegal or damaging actions by individuals, either knowingly or unknowingly.

Access to computers, computing systems and networks owned by the ELC is a privilege which imposes certain responsibilities and obligations and which is granted subject to ELC policies and guidelines and governing laws. This protocol sets forth the principles that govern appropriate use of information resources and is intended to promote the efficient, ethical and lawful use of these resources. Individuals using information resources belonging to the ELC must act in a responsible manner and with respect for the rights of others.

Guidance

1. Use ELC-provided information resources for ELC-related business in accordance with job functions and responsibilities, except as otherwise provided by management directives or other ELC policies.
2. Permit limited personal use of information resources if the use does not result in a loss of productivity, interfere with official duties or business and involves minimal additional expense to the ELC. Unauthorized or improper use of information resources may result in loss of use or limitations on use of those resources.
3. When using ELC information resources, associates are expected to:
 - a. Act responsibly so as to ensure the ethical use of ELC information resources in compliance with the Standards of Ethical Conduct.
 - b. Acknowledge the right of the ELC to restrict or rescind computing privileges at any time.
 - c. Use security measures to protect the confidentiality, integrity and availability of information, data and systems.
 - d. Act professionally in the workplace and to refrain from using ELC information resources for activities that are inappropriate.
 - e. Respect all pertinent licenses, copyrights, contracts and other restricted or proprietary information.
 - f. Use good judgment in accessing the Internet. Each use of the Internet should be able to withstand public scrutiny without embarrassment to the ELC.
 - g. Safeguard their user IDs and passwords and use them only as authorized. Any actions taken under an assigned identification (e.g., user id) are the responsibility of the user.
 - h. Respect ELC property.

- i. Make only appropriate use of data to which they have access.
 - j. Exercise good judgment regarding the reasonableness of personal use.
 - k. Use information resources efficiently.
4. The following activities are strictly prohibited:
- a. Intentionally corrupting, misusing, or stealing software or any other computing resource.
 - b. Accessing ELC systems that are not necessary for the performance of the associate's duties.
 - c. Performing functions that are not related to staff's job responsibilities on systems that they are otherwise authorized to access.
 - d. Making unauthorized changes to ELC computer resources, including installation of unapproved software or interfering with security measures (such as audit trail logs and antivirus software).
 - e. Copying ELC proprietary software or business data for personal or other non-ELC use.
 - f. Unauthorized copying of copyrighted material including, but not limited to, digitization and distribution of photographs from magazines, books or other copyrighted sources, copyrighted music and the installation of any copyrighted software for which ELC or the end user does not have an active license.
 - g. Disseminating trade secrets or business confidential information, except as permitted by law or regulation.
 - h. Transmitting, storing, or processing classified data except as authorized and in accordance with the ELC Information Systems Security Plan.
 - i. Unauthorized access to other computer systems using ELC information resources.
 - j. Accessing information resources, data, equipment, or facilities in violation of any restriction on use, such as Peer-to-Peer.
 - k. Using ELC computing resources for personal or private financial gain.
 - l. Using another person's computer account, with or without their permission.
 - m. Implementing any computer systems without authorization from the ELC IT.
 - n. Knowingly, without written authorization, executing a program that may hamper normal ELC computing activities, such as Peer-to-Peer.
 - o. Adding components or devices (e.g., PDAs, thumb drives, cameras, etc) to ELC desktops without explicit approval from IT.
 - p. Knowingly introducing malicious programs into the network or server (e.g., viruses, worms, Trojan horses, Email bombs, etc.).
 - q. Revealing account passwords to others or allowing the use of one's account by others, including family and other household members when work is being done at home.
 - r. Revealing system passwords (e.g. ELC system passwords, database passwords, etc) to anyone who is not specifically authorized to use them.
 - s. Exporting software, technical information, encryption software, or technology, in violation of international or regional export control laws.
 - t. Effecting security breaches or disruptions of network communication.
 - u. Unauthorized security scanning, network monitoring, or data interception that is not part of the associate's regular job duties.
 - v. Circumventing any ELC information security measures.
 - w. Interfering with or denying service to other information resource users, such as using Peer-to-Peer.

- x. Providing information about, or lists of, ELC staff to parties outside of the ELC that are not required for ELC business.
 - y. Sending unsolicited Email messages (spam).
 - z. Any form of harassment via Email, telephone, pager, IRC, SMS, or other communication method, whether through language, frequency, or size of messages.
 - aa. Creating or forwarding "chain letters," "Ponzi," or other "pyramid" schemes of any type.
 - bb. Engaging in any outside fund-raising activity, endorsing any product or service, participating in any lobbying activity, or engaging in any partisan political activity without specific permission from ELC.
 - cc. Posting ELC information to external news groups, bulletin boards or other public forums without authority, or conducting any activity that could create the perception that communication was made in one's official capacity as an ELC staff, unless appropriate ELC approval has been obtained.
 - dd. Any personal use that could cause congestion, delay, or disruption of service to any ELC system or equipment, such as Peer-to-Peer.
 - ee. Using ELC equipment or information resources for activities that are illegal, inappropriate, or offensive to fellow associates or the public. This includes, but is not limited to, materials related to:
 - 1. Sexually explicit or sexually oriented content.
 - 2. Ethnic, racial, sexist, or other offensive comments.
 - 3. Anything that is in violation of sexual harassment or hostile workplace laws.
 - 4. Making fraudulent offers of products, items, or services.
 - 5. Gambling.
 - 6. Illegal weapons or terrorist activities, and
 - 7. Planning or commission of any crime
 - ff. Forging or misrepresenting one's identity.
5. Auditing and Privacy:
- a. Monitor all use of ELC information resources.
 - b. Do not have an expectation of privacy or anonymity while using any ELC information resource at any time, including accessing the Internet and Email.
 - c. Agree to be governed by acceptable usage policies and to have their usage audited.
 - d. Consent to disclosing the contents of any files or information maintained or passed-through ELC equipment is implied by using ELC equipment.
 - e. Avoid using ELC equipment such as their computer, the Internet, or Email, for those activities to the extent that employees wish that their private activities remain private.
 - f. Implement auditing procedures to ensure compliance with ELC security policies.
 - g. System administrators have the ability to audit network logs, employ monitoring tools and perform periodic checks for misuse.
 - h. Agree to be bound by the conditions for continued use of ELC information resources
 - i. Sign an agreement to comply with ELC information security protocol.
 - j. Report usage of ELC IT resources for illegal purposes to appropriate authorities.

5.05.02.02 Information Resources (IT)

In order to ensure appropriate levels of protection are applied to information resources, a framework is needed to classify those resources based on their criticality to the ELC and the confidentiality of the data that they contain.

This includes developing procedures and standards for assessing the criticality and confidentiality of the systems and determining minimum security requirements based on those classification levels.

- A. Categorize all ELC information resources based on ELC's information classification framework.
- B. Assess risks and threats to information resources.
- C. Apply security measures based on the resource's classification level, in accordance with ELC risk management procedures.
- D. Base the ELC's information classification framework on the reference guidance and subsequent publications.

5.05.02.03 Risk Management (IT)

In determining a security strategy for a system or the organization, the ELC will determine the correct balance between mitigating risks and expending resources. Appropriate controls must be implemented to protect against the occurrence of serious threats to the business, while addressing financial and operational concerns. The objective of performing risk management is to enable ELC to accomplish its mission by the following:

- A. Secure the IT systems that store, process, or transmit organizational information.
- B. Enable management to make well-informed risk management decisions to justify the expenditures that are part of an IT budget.
- C. Assist management in authorizing (or accrediting) their IT systems on the basis of the supporting documentation resulting from the performance of risk management.
- D. Treat risk management as an essential management function and as a technical function relegated to IT operational or security personnel for implementation.
- E. Support effective risk management processes as a sound risk-based decision-making.
- F. Use a risk-based approach which includes vulnerability scanning to determine information security requirements to ensure security is commensurate with the risk and magnitude of harm that can result from the loss, misuse, unauthorized access to, or modification of, ELC information.
- G. Make all Application and Data Services decisions based on a thorough analysis of the risks involved.
- H. Integrate risk management procedures into the ELC's systems development life cycle (SDLC). Risk management is an iterative process and has activities relevant to every phase of the life cycle.
- I. Include security considerations in the initiation, development/acquisition, implementation, operation/maintenance and disposal of all ELC information resources.
- J. Perform risk management is a cyclical process on an ongoing basis for all information resources.
- K. Adhere to NIST guidance as set forth in Special Publication 800-30, Risk Management and subsequent publications.

5.05.02.04 Security Training and Awareness (IT/HR)

Aside from compliance with legal requirements, a Security Training and Awareness program is crucial to the safeguarding of ELC information resources. Information security protocol and standards cannot be effective unless everyone at ELC, regardless of position in the organization, is aware of the importance of security, understands ELC security procedures and performs required practices.

To make information security effective, standards and procedures must be known, understood, believed to be beneficial and be appropriately and consistently practiced.

Information Security is not a one-time event, but a continuous effort and "state of mind". This is achieved by reinforcing concerns and appropriate behaviors on a continuous basis. Effective information security is achieved when it becomes part of everyone's thinking with regard to daily operations and assignments.

- A. Develop and maintain an Information Security Training and Awareness Program in accordance with ELC's training policy. The purpose of the Security Training and Awareness program is to educate associates about information security policies and procedures and make them aware of their roles and responsibilities in safeguarding ELC's information resources. The program will be composed of two major initiatives:
 1. Design a Training program to build relevant and needed security skills and competencies to facilitate job performance.
 2. Design an Awareness program focus attention on security and to change behavior or reinforce good security practices. Ongoing development of security awareness builds a culture that encourages good security practices.
- B. Complete training on ELC Information security policies and procedures for all employees.
- C. Incorporate information security training the orientation processes for all new staff.
- D. Complete training within 30 days of employment or initiation of contract and refresher trainings as specified in ELC training policy.
- E. Make employees and contractors aware of the penalties for non-compliance with ELC security policies and procedures.
- F. Post or present materials in a variety of formats on a regular basis to maintain employee awareness of information security issues.
- G. Communicate changes to ELC information security policies or procedures to all information employees.

5.05.02.05 Incident Reporting (IC)

Maintaining the security of ELC information resources requires cooperation and participation from everyone.

- Maintain vigilance regarding information security
- Report immediately any suspected incidents
- Minimize potential damage to ELC

ELC's security incident reporting protocol and procedures enable the ELC to quickly and efficiently:

- recover from security incidents;

- respond in a systematic manner to incidents;
- carry out all the necessary steps to correctly handle an incident;
- prevent or minimize disruption of critical computing services;
- minimize loss or theft of confidential or mission-critical information

Report within 24 hours in writing to OEL for any breach of security or security incident of unauthorized disclosures

- Provide the nature of the unauthorized use or disclosure
- Identify the confidential information used or disclosed
- Give name(s) of individual(s) who made the unauthorized use or received the unauthorized disclosure
- Disclose what the ELC has done or will do to mitigate any harmful impact of the unauthorized use or disclosure and
- Provide what corrective action the ELC has taken or shall take to prevent similar future unauthorized use or disclosure incidents

5.05.02.06 Incident Response (IT)

The Federal Information Security Management Act (FITSOA) and OMB Circular A-130, Management of Federal Information Resources, Appendix III, Security of Federal Automated Information Systems require the ELC to have an incident response capability and to share information concerning common vulnerabilities and threats.

Establish a formally documented and clearly understood incident response process that will make it possible for the ELC to respond quickly and effectively to situations that might compromise the ELC's information resources.

- A. Respond to all reported security incidents quickly
- B. Adhere to ELC Information Security incident handling procedures.
- C. Establish Information Security Incident Response procedures to address computer security incidents, including theft, misuse of data, intrusions, hostile probes and malicious software.
- D. Provide when an incident occurs, a verbal report to the IT within one working day after the incident.
- E. Report critical incidents immediately.
- F. Complete a written preliminary report within two working days using the ELC's incident reporting form.
- G. Complete report by the individual handling the incident.
- H. Write a final report within five working days of the resolution of an incident and submit it.
- I. Report on a weekly status report to IT in cases where incident resolution is expected to take more than thirty days.
- J. Give priority in incident handling to preventing further damage to ELC information resources.
- K. Keep a log of all the actions taken, including triage steps and other regular or routine work performed on the affected systems.
- L. Keep log separate from normal system logs, since it may be used as evidence in a criminal prosecution if warranted.

- M. Enter into and maintain a cooperative agreement with OEL to facilitate share incident information and provide assistance with incident resolution.

5.05.02.07 System Security Plans (IT)

A security plan lists security requirements, defines risks and describes security measures to be implemented for a particular system. This helps to ensure a security risk analysis is performed for the system and that appropriate security controls are put in place. The security plan also defines roles and responsibilities for security of the system, as well as standard operating procedures.

Have an approved Security Plan for each new major information system before going into operation.

- A. Develop an approved Security Plan for existing major information systems one as soon as possible if there is none.
- B. Review, update and re-approve each system security plan at least once every two years, or when there is a major change to the system, whichever is earlier.
- C. Use the System Security Plan as a critical component of the Certification and Accreditation of the system.
- D. Have a Memorandum of Understanding (MOU) or other formal documented agreement for other organizations or systems that are connected to or share data with the ELC system that describes the rules governing the interconnection.
- E. Mark, handle and control System Security Plans as confidential but unclassified information.

5.05.02.08 Certification and Accreditation (IT)

The purpose of Certification and Accreditation (C&A) is to ensure information systems have adequate security commensurate with the level of risk. To this end, C&A is the formalized process used to assess the risks and security requirements of each system and to determine whether the system's security needs are being met.

Federal Information Security Management Act (FITSOA) requires the ELC to perform C&A of its information systems. For each system, this process must be completed either every 3 years or when there is a change that affects the system's security posture.

- A. Assign a senior executive to act as the Designated Approving Authority (DAA) to accredit ELC information systems.

Certification:

Implement Certification program to test and evaluate technical and non-technical IT security features and other safeguards used by ELC systems, in support of the Accreditation process.

1. Address software and hardware security safeguards, and also procedures, physical protections and personnel security measures.
2. Perform Security Testing & Evaluation (ST&E) during the Certification process to evaluate the effectiveness of security measures implemented for the system.
3. The following minimum requirements must be met for a system to be certified:
 - a. Thoroughly document the system.

- b. Develop and approve a system security plan.
- c. Complete an ST&E of the system.
- d. Conduct a risk assessment.
- e. Develop standard operating procedures for the system.
- f. Have the system meet all applicable legal requirements and ELC policies.
- g. Have a contingency plan for the system.

Accreditation:

Use Accreditation process for obtaining official management authorization for the operation of an IT resource.

1. In the form of a formal declaration by the DAA that an IT resource is approved to operate in a particular security mode using a prescribed set of safeguards.
 2. Based on findings, facts and support documents produced during the Certification process, as well as other management considerations.
 3. Use an Accreditation statement, which affixes security responsibility with the accrediting authority (DAA), to certify that proper attention has been afforded to the security of the IT resource.
 4. Address the residual risks associated with the respective system or network, subsequent to the implementation of countermeasures applied during the system test and evaluation.
- B. Complete Certification and Accreditation statements for all major applications and general support systems.
 - C. Review Certification and Accreditation statements before they are signed by the DAA.
 - D. Issue an Interim Authority to Operate (IATO) in those cases in which systems need to be implemented expeditiously, but the IATO should last no longer than 6 months and should only be granted if it does not pose a significant risk to ELC information resources.
 - E. Certify and accredit existing operational systems that have not been within the last 3 years to undergo Certification and Accreditation within 1 year of the issue date of this order.
 - F. Certify and accredit all new ELC IT systems prior to being allowed into operation.
 - G. Recertify and reaccredit all systems at least every three years or when there is a significant change to the security posture of the system, whichever is earlier.

5.05.02.09 Vulnerability Testing (IT)

Today's information systems are complex and composed of many interdependent and interconnected components. Despite how well they have been developed, all systems have some inherent vulnerabilities or exploitable flaws. Over time, these vulnerabilities are likely to be exploited, either intentionally or accidentally.

Security testing is an important means of detecting weaknesses and determining the threat posed by them. It also helps to determine the effectiveness of security measures that have been implemented and to assess how well the organization can withstand security attacks. A vulnerability testing program provides the crucial details to prepare the ELC to avoid the significant financial costs or damage to its reputation that could result from security malfeasance.

Because threats, vulnerabilities and the configurations of the systems themselves are always changing, Federal Information Security Management Act (FITSOA) requires the ELC to perform security testing on a periodic basis.

This protocol establishes a systematic, comprehensive, ongoing and priority-driven security testing program that will assist the ELC in determining its security priorities and making prudent investments to enhance the security posture of its information resources.

- A. Conduct vulnerability testing at least annually while systems are running in their operational environments.
- B. Testing should not disrupt critical business operations.
- C. Define and document procedures for testing clearly.
- D. Document all test results well.
- E. Communicate if necessary, the “rules of engagement” to the system owners.
- F. Inform information owners and information custodians the results to ensure vulnerabilities are patched or mitigated.
- G. Retest all systems once vulnerabilities are addressed to ensure they have been effectively mitigated.
- H. Integrate vulnerability testing into the ELC’s risk management processes.

5.05.02.10 Contingency Planning (IT/CO)

In addition to being a legal mandate, contingency planning is simply a good business practice and part of the fundamental mission of the ELC as a responsible and reliable institution. For the success of the ELC’s programs, its information systems must be available in the event of disruptions/disasters.

The ELC’s information systems are vulnerable to a variety of disruptions, ranging from mild (e.g., short-term power outage) to severe (e.g., equipment destruction, fire) and from a variety of sources ranging from natural disasters to terrorists actions. While much vulnerability may be minimized or eliminated through technical, management, or operational solutions as part of the ELC’s risk management program, it is virtually impossible to completely eliminate all risks. In many cases, critical resources reside outside the ELC’s control (such as electric power or telecommunications) and the ELC may be unable to ensure their availability.

Establish effective contingency planning, execution and testing to mitigate the risk of system and service unavailability.

- A. Develop and maintain a viable contingency planning program for its major information systems and mission-critical applications.
- B. Support the ELC’s Continuity of Operations (COOP) Planning.
- C. Provide documented plans on how the ELC will continue its mission and provide continuity of data processing if service, use, or access is disrupted for an extended period of time.
- D. Have its own Contingency Plan, Continuity of Support Plan, or Disaster Recovery Plan for each major IT system.

- E. Base contingency planning on business impact analyses that will identify and rank major information systems and mission-critical applications according to priority and the maximum permissible outage for each.
- F. Identify preventive measures to reduce the effects of system disruptions and increase system availability.
- G. Recovery strategies and procedures will be developed to ensure systems may be recovered quickly and effectively following a disruption.
- H. Hold contingency plan testing and training to address deficiencies
- I. Prepare information owners and custodians for plan activation.
- J. Have testing annually or when a significant change occurs to the ELC's major information systems or mission-critical applications.
- K. Review contingency plans regularly and update as needed to remain current with ELC Application and Data Services enhancements.

5.05.02.11 Access Control (CO/DSA/SSA)

Employees must have access to the information resources required to do their jobs. However, National Institute of Standards and Technologies (NIST), Control Families, Special Publication 800-53 and best practices suggests excessive or uncontrolled access can lead to the unauthorized or unintentional disclosure, modification, or destruction of those resources, as well as liability for negligence in protecting those resources.

Only authorized personnel who have a legitimate need to use ELC resources may be granted access to specific resources and their access privileges will be limited to those required to perform their duties.

- A. Grant employees specific access privileges on each system, limited to those required to perform their job functions.
- B. Authorize employee by the information owner prior to being granted access to a particular resource.
- C. Access by employees only to resources to which they have been authorized, regardless of actual system permissions.
- D. Do not allow employee to circumvent the permissions granted to their accounts in order to gain access to unauthorized information resources.
- E. Protect their assigned accounts.
- F. Do not allow anyone else to use their account, or use their computers while logged in under their account, except as required for system administration.
- G. Either log out or invoke protection of their system (such as a password-protected screensaver) when leaving their computer unattended.
- H. Responsible for any activity initiated by their own user ID (only they should have access to their user ID).
- I. Level of access control will depend on the classification of the resource and the level of risk associated with the resource.
- J. Establish criteria for account eligibility, creation, maintenance and expiration for each system.
- K. Review periodically user privileges and modify, revoke, or deactivate as appropriate, based on the above criteria.

- L. Implement inactivity timeouts (i.e., computer being idle for a set amount of time), where technically feasible, for access to confidential information.

5.05.02.12 Identification and Authentication (IT/HR)

In order to ensure unauthorized persons do not have access to confidential ELC information resources, it is necessary to first establish the identity of the employee who is attempting to access the resource. Access controls can then be used to allow or limit access based on the established employee identity.

- A. Commensurate the specific method(s) of authentication used for each system with the level of confidentiality of the system to be accessed (i.e. more confidential systems should use stronger authentication methods).
- B. Require multiple authentication methods (e.g. use of both a password and a token) for high-confidentiality or high-risk situations.
- C. Incorporate each ELC system with proper employee authentication and identification to ensure access is not granted to unauthorized persons.
- D. No access for employee to ELC information resources without identifying and authenticating themselves (i.e. "logging on").
- E. Develop and follow detailed procedures for the creation, removal and modification of employee accounts and authentication credentials.
- F. Adhere to the following guidelines for employee accounts:
 - 1. Allow only one employee per account
 - 2. Do not share employee IDs
 - 3. Never install a guest/guest account.
 - 4. Remove any guest accounts that are created by default by the system unless absolutely required and approved by the system owner.
 - 5. Do not name any accounts with easily guessed generic names (such as "anonymous," "guest," "admin," "ftp," "telnet," "www," "host," "employee," "test," "bin," "nobody," etc.,) unless absolutely technically required by the system.
 - 6. Remove or rename default accounts that are present upon initial installation of the system unless absolutely technically required by the system.
 - 7. Deactivate accounts immediately upon termination of staff or contractor.
 - 8. Deactivate unused accounts on at least a quarterly basis.
 - 9. Set expiration on accounts for contractors and temporary staff on the final date of their contract unless otherwise approved and documented.
- G. Adhere to the following guidelines for administrator accounts:
 - 1. Rename the names of the administrator accounts, if possible, to make it more difficult for attackers to guess the names of these accounts
 - 2. Create administrative account for each person who has a legitimate need to use Administrator privileges that they will use to perform administrative functions
 - 3. Limit usage of the main administrator account for each system to emergencies and is to be limited to designated ELC IT staff
 - 4. Protect the main administrator account
 - 5. Provide an audit trail of administrative activities

- 6. Have strong passwords or other alternative strong authentication methods for all accounts with administrator privileges
- 7. Adhere to the ELC Password Management Protocol 5.05.02.32 for authentication
- H. If authentication methods other than passwords are used (e.g., biometrics, smartcards, tokens, etc), then:
 - 1. Seek approval from CIO
 - 2. Develop additional policies and procedures to govern usage
- I. Account credential information (e.g., Employee IDs, passwords) that are stored on the devices (such as enable passwords in router configuration files) must be encrypted.
- J. To preclude brute force attacks, an intruder lockout feature shall be implemented on each system to temporarily suspend the account after three invalid logon attempts. Manual action by a security system administrator is required to reactivate the ID.
- K. The ELC will restrict access to authentication data. Authentication data will be protected with access controls and encryption to prevent unauthorized individuals from obtaining the data.

5.05.02.13 Audit Trails (IT)

In order for the ELC to enforce information usage policies and security measures and to investigate security incidents, it must maintain automated logs of access to and alteration of information systems and data. It must maintain a record of activity (or “audit trail”) of system and application processes and employee activity of systems and applications.

The ELC uses this information to investigate security incidents, monitor use of ELC resources, provide accountability for transactions, track system changes and assist in detection of system anomalies. In conjunction with appropriate tools and procedures, audit trails can assist in detecting security violations, performance problems and flaws in applications.

- A. Maintain audit trails for ELC information systems.
- B. At minimum, log the following transactions for each server:
 - 1. Server startup and shutdown.
 - 2. Loading and unloading of services.
 - 3. Installation and removal of software.
 - 4. System alerts and error messages.
 - 5. Employee logon and logoff.
 - 6. System administration activities.
 - 7. Accesses to confidential information and systems.
 - 8. Modifications of privileges and access controls.
 - 9. Additional security related events.
- C. At minimum, log the following transactions for each application:
 - 1. Modifications to the application.
 - 2. Application alerts and error messages.
 - 3. Employee sign on and sign off.
 - 4. System administration activities.
 - 5. Accesses to confidential information.
 - 6. Modifications of privileges and access controls.

- D. At minimum, log the following transactions for each router, firewall, or other major network device:
 1. Device startup and shutdown;
 2. Administrator logon and logoff;
 3. Configuration changes;
 4. Account creation, modification, or deletion;
 5. Modifications of privileges and access controls; and
 6. System alerts and error messages.
- E. Record type of event, date, time and employee identification for each logged transaction.
- F. Do not store confidential information, such as passwords and actual system data, in the logs.
- G. Conduct periodic reviews of audit logs by IT.
- H. Give access to the audit logs only by designated personnel.
- I. Keep all audit trail files for three (3) years
- J. Retain audit trails associated with known incidents (including those used for legal action) for the period of time designated by the CFO.
- K. Keep audit trails in a secure location.
- L. Secure audit data at the site and in the backups. If an intruder were to gain access to audit logs, the systems themselves, in addition to the data, would be at risk.

5.05.02.14 Antivirus (IT/IC)

Computer viruses are programs that reproduce themselves and often attempt to do harm to the computers that they infect. Viruses may destroy ELC data, make ELC computers unusable, use ELC's computer to attack other computers, or perform a variety of other malicious activities. There are many different types of computer viruses.

Use of antivirus software is essential for protecting ELC resources from the danger posed by computer viruses and other malicious programs. These programs check for viruses on ELC's computers and attempt to remove them before they can spread or perform further damage.

However, antivirus programs take time to learn about each new virus that is created, during which the virus can do serious damage. Therefore, it is also important that users and system administrators be aware of the risks posed by viruses, and take steps to minimize exposure to them.

- Run ELC standard on every ELC server and workstation, supported antivirus software.
- Use antivirus software at its email gateway to scan messages and attachments.
- Do not unload or disable antivirus software for any reason without specific instruction from ELC IT.
- Update antivirus software automatically as new virus profiles are made available by the vendor.
- Load and update ICSA approved antivirus software on a regular basis on any computer used for remote access to ELC network (such as a laptop used for telecommuting).
- Quarantined or deleted any infected files that cannot be repaired.
- Remove any infected computers that cannot be cleaned by the antivirus software from the network until they can be verified as virus free.
- Train employees on techniques for avoiding viruses, including the following guidance:
 - Never open any files attached to an email from an unknown, suspicious or untrustworthy source. Delete these attachments immediately and empty your trash;
 - Delete spam, chain, and other junk email without forwarding;
 - Never download files from unknown or suspicious sources; and

- Never install any software on ELC computers without specific permission from ELC IT.
- Scan for viruses on all portable media (*e.g.* floppy diskettes, CDs) before use on an ELC computer.
- Maintain documentation to verify the purchase and installation of antivirus software.

5.05.02.16 Personnel Security (HR)

The greatest harm/disruption to a system comes from the actions of individuals, both intentional and unintentional. Employees, designers, implementers, administrators and managers are involved in many important issues in securing information.

It is important to ensure the personnel who have access to the ELC's information resources can be trusted to institute controls over the access provided to those personnel and to implement procedures that minimize the personnel-related risks to the ELC's resources.

Any access granted to ELC information resources will be based on the principles of separation of duties and least privilege and in compliance with National Institute of Standards and Technology (NIST), Guide to Selecting Application and Data Services Security Products, Special Publication 800-36 and American National Standards Institute/International Committee for IT Standards (ANSI/INCITS) 359-2004 Application and Data Services-Role Based Control.

- A. Have appropriate clearance for the sensitivity level of the resources which employees are given access.
- B. Submit to a Request for Background Investigation through the ELC Human Resource prior to being granted access to classified information resources, employees for whom no previous investigation and/or no recent, documented positive suitability determination has been made,
- C. Train employees in the information security responsibilities and duties associated with their jobs.
- D. Implement a detailed process to manage employee accounts, including processing requests for new accounts, establishing accounts and closing accounts as well as tracking accounts and employee access authorizations.
- E. Implement procedures for outgoing or transferring employees. These will include, but are not limited to, the following:
 1. The removal of access privileges, computer accounts and authentication tokens.
 2. The return of any ELC information resources (property or data).
 3. Procedures for unfriendly termination that include the prompt removal of system access.
- F. Sign by contractors a non-disclosure agreement protecting any confidential data to which the contractor requires access.

5.05.02.17 Physical and Environmental Security (CO/DSA/SSA)

It is crucial that the ELC implement physical security safeguards to protect its information resources. These safeguards must be applied in all administrative, physical and technical areas and can include the use of locks, guards, administrative controls and measures to protect against damage from intentional acts, accidents, fires and environmental hazards.

Control physical access to information resources commensurate with the classification of the resource and the level of risk.

- A. Require areas containing confidential information resources with special restrictions to limit access to these resources:
 - 1. Limit admittance to these areas to personnel assigned to the area and persons who have been specifically authorized access to the area.
 - 2. Escort personnel assigned to the area without an appropriate security clearance.
 - 3. Protect confidential information when unauthorized personnel are present in these areas from observation, disclosure, or removal.
 - 4. Store away documents and positioning all computer monitors to prevent viewing by unauthorized persons.
 - 5. Display appropriate identification when challenged by another ELC staff when in confidential area.
 - 6. Remove individual if failure to display appropriate identification or other administrative action.
- B. Provide special protections to areas containing critical information resources to safeguard the availability of these resources:
 - 1. Implement protection against fire, flood, humidity, electromagnetic disturbance and other environmental factors that could damage the resources.
 - 2. Monitor automated systems for environmental problems and alert specified personnel as appropriate.
 - 3. Keep backups and other media, both originals and copies, containing data and programs in good condition and protected from theft.
 - 4. Keep backups in a separate location from the originals, not only for damage considerations, but also to guard against thefts.
- C. Restrict other areas where physical access is not allowed: wiring closets and computer storage areas.

5.05.02.18 Change Control (IT)

Change control involves controlling and managing changes to the ELC's information systems to ensure integrity of data and information. ELC information systems require appropriate administrative, physical and technical controls to be incorporated into both new additions and changes to systems.

These controls must encompass not only the software, but also the routine activities that enable the ELC's information systems to function properly (e.g., fixing software or hardware problems, loading and maintaining software, updating hardware and software and maintaining a historical record of application changes). Change control prevents unexpected changes from inadvertently leading to denial of service, unauthorized disclosure of information and other problems.

Informal operational processes with no means of controlling changes to information systems impede the ELC's ability to determine the status of its current architecture and even to propose changes. Change control planning addresses this deficiency and establishes a consistent, cross-organizational change management process for ELC information systems. Change control history is a valuable tool for both emergency response and information architecture planning.

Develop baseline information that includes a current list of all components (**hardware**, software and their documentation), configuration of peripherals, version releases of current software, information on batch files, environmental settings such as paths and switch settings of machine components.

- A. Systematically plan, approve, test and document changes to each ELC information system at a level appropriate with the size, complexity and confidentiality of the system.
- B. Maintain a log for each information system:
 - all configuration changes made
 - name of the person who performed the change
 - date of the change
 - purpose of the change
 - any observations made during the course of the change
- C. Implement procedures to ensure maintenance and repair activities are accomplished without adversely affecting system security. The procedures include the following:
 1. Establish who performs maintenance and repair activities.
 2. Contain procedures for performance of emergency repair and maintenance.
 3. Contain the management of **hardware**/software warranties and upgrade policies to maximize use of such items to minimize costs.
- D. Follow version control that associates system components to the appropriate system version.
- E. Implement procedures identified for the ELC's operations for testing and/or approving system components (operating system, other system, utility, applications) and configuration changes prior to promotion to production.
- F. Notify employees regarding how they will be impacted by changes.
- G. Make available current backups when changes are made.
- H. Install all software, operating systems and patches in accordance with U.S. copyright regulations, the license for that software and applicable ELC Information Security policies.
- I. Only authorized personnel may make changes to ELC information systems.
- J. Document change control procedures for all systems to provide a complete audit trail of decisions and design modifications.
- K. Make available change control documentation (especially change logs) even if the network is down and will not contain passwords for affected components.

5.05.02.19 Backup and Recovery (IT)

There are many threats that exist which could cause the loss, corruption, or temporary unavailability of data. These include, but are not limited to, hardware failures, accidental deletion, incorrect modification, software corruption and malicious activities. These threats are very common and it is inevitable that some of these events will occasionally occur at the ELC.

Maintain backup copies of all critical data and systems to provide the continued availability and viability of these resources.

- A. Backup all critical ELC information resources in a recoverable fashion.
- B. Perform backups according to the following schedule:
 1. At least on a daily basis, backup all critical data and system configurations;
 2. Back up changes to applications and licenses; and

3. The backing up of non-critical data is at the discretion of the data owner.
- C. Store off-site backups in a secure, environmentally-controlled location.
- D. Define backup retention schedule for each system to comply with the Coalition's Records Retention Schedules.
- E. Periodically test the backup and restore procedures to ensure data is effectively restored from the backups.
- F. Develop and implement detailed procedures for performing backups restoring data, performing testing of backups, transferring tapes to/from the storage facility and recycling or disposing of backups upon expiration of their retention period.
- G. Treat backups with the same level of criticality and confidentiality as the data and applications stored on them.
- H. Perform background screening on persons who have access to the backups, or who have access to perform back up or restore functions, in accordance with Office and Northwest Regional Data Center Personnel Security practices prior to being given such access.
- I. Handle backup media (e.g., tapes) in accordance with Coalition Media Management protocol.
- J. Backup to be performed by:
 - IT staff to perform back up data stored on servers
 - Other staff to perform back up any data stored on workstations and portable storage media (i.e., diskettes, flash drives, CDs, etc).
- K. Copy data to servers to be backed up or perform own backups of data not stored on ELC servers.
- L. Handle backups in accordance with Coalition Media Management protocol.

5.05.02.22 Mobile Computing (IC)

The use of laptop computers and mobile devices (such as PDAs) provide flexibility and enhanced communications that allow ELC personnel to be more productive. However, the use of these devices outside of the ELC poses risks to those devices and the information they contain. These devices may also present a hazard to other ELC resources upon their return to the ELC (for example, by spreading a virus that was obtained outside). These devices have the capability for direct connectivity to the Internet or other networks outside of the ELC's network, which lack the protections afforded by the ELC's corporate firewall and other perimeter protections.

Implement additional security measures to mitigate increased security risks presented by mobile computing.

- A. Inventory and track laptops and other mobile computing devices.
- B. Use antivirus and personal firewall software when connected to any network other than the ELC's network.
- C. Authenticate access to mobile devices which store or transmit confidential data, or which use to connect to other confidential ELC systems.
- D. Apply all security policies in the ELC physical environment when using or connecting to ELC resources outside the ELC physical environment.
- E. Require employees to back up their data that is stored on the mobile computer on a regular basis.
- F. Protect OEL confidential data placed on any mobile device against unauthorized access via encryption, biometrics, or other appropriate measures.

G. Prohibit storage of confidential data on any mobile device.

5.05.02.25 Remote Access (IC)

Remote access to the ELC's network provides many benefits. It allows personnel traveling on business to connect to ELC information resources and provides the capability for telecommuting. However, remote access to the ELC's network via dialup or other connectivity poses a risk of intrusion into the network by unauthorized persons, as well as interception of the data being transferred through the remote connection.

Direct connectivity to the Internet or other network outside of the ELC's network also lacks the protections afforded by the ELC's corporate firewall and other perimeter protections.

Implement additional security measures to mitigate the increased security risks presented by remote access.

- A. Authenticate all remote connectivity using strong or multi-factor authentication (such as the use of passwords in conjunction with tokens).
- B. Encrypt all confidential data transferred over a remote access connection to protect it from unauthorized disclosure.
- C. Observe all security policies for use in the ELC physical environment when using or connecting to ELC resources while outside the ELC physical environment.
- D. Meet ELC remote access requirements, including having an approved antivirus program installed and configured with the latest updates.
- E. No personal equipment is allowed to connect to the ELC's information resources.
- F. Do not store ELC confidential data on any non-ELC computers.
- G. Ensure access devices and remote connections are not used by unauthorized persons (including family members).
- H. Cannot change operating system configurations, install new software, alter equipment or add to it in any way (e.g., upgraded processors, expanded memory, or wireless cards), or download software from systems outside of the ELC onto remote access computers.
- I. Prevent unauthorized employees from accessing confidential ELC information via open modem ports:
 - Log out rather than hang up after completing a remote session
 - Wait until receipt of a confirmation of log-out command from the remotely connected ELC machine
 - Do not leave before completely exiting the remote session

5.05.02.26 Telephone Security (IC)

Telephone services are intended to support the objectives and operations of the ELC and are critical to fulfilling the ELC's mission. These telephony resources are vulnerable to a variety of security threats and should be granted the same protection as other information resources.

When using the ELC phone system or ELC-issued cellular phones, employees should adhere to the following guidelines to protect the information communicated:

- A. No expectation of privacy when using these resources.
- B. Audit use of these resources.
- C. Possibility of third parties tapping or redirecting phone calls outside of the ELC.
- D. Do not discuss confidential data over a mobile phone because of the ease of intercepting such communications.
- E. Ensure that the person on the other end of the conversation is who they say they are.
- F. Do not give out confidential information (including agency credit card information) unless you are sure of the identity of the person on the other end of the line.
- G. Be cautious when discussing confidential information that the conversation cannot be overheard by unauthorized persons (such as visitors to the ELC). Minimize use of speakerphone.
- H. Obey relevant laws regarding the recording of phone conversations, including informing the other party that you are recording.
- I. Follow the ELC's Acceptable Use policy in using phone resources, just as you would with email or other information resources.
- J. Protect the ELC's VOIP and other critical telephony components in the following manner:
 - Store equipment in a secure, environmentally controlled location in accordance with the ELC's physical security protocol.
 - Same security policies for telephony equipment as other computer equipment, including Access Control, Change Control, Auditing, Patch Management, Server Security, Network Security, etc.
 - Analyze and mitigate additional security threats and vulnerabilities applicable to telephony equipment commensurate with the levels of risk and criticality/confidentiality of those resources.
- K. Do not install modems or other telephony equipment without the explicit approval of the appropriate official (e.g., CEO, CFO or Director of IT's designate for modems and related telephony equipment).
- L. Analog Phone Lines - As a rule, the following applies to requests for fax and analog lines:
 - Seek approval for fax lines for departmental use only.
 - Do not install fax lines personal use.
 - Do not allow for an analog line to a unit workstation computer that is capable of making a fax connection, due to security violation that is created.
 - Exceptions for the preceding protocol on analog-as-fax lines will be delivered on a case-by-case basis after reviewing the business need with respect to the level of confidentiality and security posture of the request.
- M. Use of an analog/ISDN fax line is conditional upon the requester's full compliance with the requirements listed below. These requirements are the responsibility of the authorized employee to enforce at all times:
 - Use solely by specified the requesters.
 - Use only by authorized persons with line access.
 - Disconnect from computer when not in use.
 - Use solely for ELC business and not for personal reasons.
- N. Computer-to-Analog Line Connections -The general protocol is that requests for computers or other intelligent devices to be connected with analog or ISDN lines from within the ELC will not

be approved for security reasons. Analog and ISDN lines represent a significant security threat to the ELC and active penetrations have been launched against such lines by hackers.

- O. Give waivers to the protocol to be granted on a case-by-case basis.
- P. Request an Analog/ISDN Line -Once approved by a manager, the individual requesting an analog/ISDN line must provide the following information to the ELC IT Team:
 - A clearly detailed business case of why other secure connections available at the ELC cannot be used.
 - The business purpose for which the analog line is to be used.
 - The software and hardware to be connected to the line and used across the line.
 - The confidentiality of the data to be transferred over the line.
 - To what external connections the requester is seeking access.
 - Whether the machines that are using the analog lines will be physically disconnected from ELC's internal network.
 - A description of where the analog line will be placed.
 - Whether dial-in from outside of the ELC will be needed.
 - The number of lines being requested and the number of people that will use the lines.
 - The line must be terminated as soon as it is no longer in use.
- Q. Seek approval from the ELC's CFO for any connectivity between the telephone system and the host network.

5.05.02.28 Systems Development (IT)

Each information system passes through multiple phases during its lifetime (SDLC), as it is planned, developed, deployed, operated and retired. Specific security-related activities must occur in each phase to assure that the system is secure.

It is usually more cost-effective to include preventive security measures from the start rather than to deal with security breaches later on. By considering security early in the information SDLC, the ELC will be able to avoid higher costs later on while also developing a more secure system from the start.

Consider security in all phases of the SDLC and treat security as an integral part of the project plan of any system development or implementation project, including system modifications.

- A. In each phase of the SDLC there are specific information security requirements that need to be met:

Initiation Phase:

1. Conduct confidentiality assessment (information, potential damage, laws and regulations, threats, environmental concerns, security characteristics, ELC protocol and Guidelines).
2. Consider which laws, regulations or policies establish specific requirements for the availability, integrity and confidentiality of the system. The environmental (e.g., hazardous location) and public threats to the system or information should also be considered.
3. Perform preliminary Risk Assessment and incorporate the results into the decision-making process regarding the development/acquisition of the system.

Development/Acquisition Phase:

1. Develop security requirements at the same time system planners define the other requirements of the system.
2. Incorporate security requirements into design specifications along with assurances that the security features acquired can and do work correctly and effectively.
3. Document the system's security design.
4. Conduct design reviews at periodic intervals during the developmental process to assure the proposed design will satisfy the specified functional and security requirements.
5. Develop operational practices including standard operational procedures and system-specific security policies (e.g., account management, backups, employee training, etc.). Develop a system handbook reflecting these practices.

Implementation Phase:

1. Configure and enable the system's security features.
2. Implement the system's security management procedures.
3. Test the system and authorize it for processing via the ELC's Certification and Accreditation (C&A) process.

Operation/Maintenance Phase:

1. Perform the security activities outlined in the system security plan (e.g., performing backups, holding training classes, managing accounts.)
2. Any changes made, or maintenance performed, on the system must comply with the ELC's Change Control and Patch Management policies and processes.

Disposal Phase:

1. Move information to another system, archived, discarded, or destroyed in accordance with Florida Department of State Retention Schedules, if necessary.
2. Dispose of any storage media as required by the ELC's Media Management policies.
3. Dispose of software in keeping with its license or other agreements.
4. Categorize each application as required by the ELC's Information Resource Classification protocol and provide protection appropriate to its level of confidentiality and criticality.

System Testing:

1. Test all systems thoroughly prior to placement in the ELC production operating environment.
 2. Do not use confidential data to test applications software until software integrity has been reasonably assured by testing with non-confidential data or files.
- B. Provide documentation of confidential systems the same degree of protection as that provided for the software.
- C. Obtain application software used at the ELC through authorized procurement channels and comply with all licensing requirements.
- D. Ensure systems are complying with all ELC information security policies and procedures (e.g., system hardening, access control, backup and recovery, etc.).

5.05.02.31 Media Management (IC)

The ELC has been entrusted with a variety of confidential data in order to accomplish its mission. This data, which is stored on a variety of media, must be protected from unauthorized disclosure, damage, fraud and abuse.

Use a variety of security mechanisms that provide protections for media to protect the security and privacy of information.

Media Handling:

- A. Take all reasonable steps to protect ELC storage media in possession from tampering or accidental damage.
- B. Responsible for making own backups of any data that is not stored on ELC servers.
- C. Provide appropriate physical and environmental protection controls for stored media.
- D. Handling media that contain confidential data:
 - 1. Mark media with its classification level.
 - 2. Include labeling any special handling instructions.
 - 3. Secure media (such as kept in a locked drawer, cabinet, or safe) when not in use or unattended.
 - 4. Transport any media confidential information through the mail or courier/messenger service with double-sealed.
 - 5. Mark the second envelope appropriately with the confidentiality classification of the data.
 - 6. Monitor receipt and delivery of media containing confidential data.
 - 7. Account to ensure data is not lost and potentially compromised while in transit
 - 8. Turn over confidential information or put out of sight when visitors are present.

Media Disposal:

- A. Understand that deleting data from media does not completely or permanently remove the information.
- B. Dispose files properly as deleted files are susceptible to unauthorized retrieval.
- C. Sanitize media that contain confidential data when they are no longer needed to store the confidential data.
- D. Sanitize before any ELC-owned or managed computing equipment is transferred, donated, or otherwise disposed of, storage media associated with the equipment via the ELC's IT Operations Manual.

5.05.02.32 Password Management (IC)

In order for passwords to be an effective tool for providing security, they must be selected, stored and administered appropriately. If passwords are poorly chosen, they can easily be guessed and then used by unauthorized persons. Likewise, passwords that are inappropriately stored are subject to disclosure and misuse by unauthorized persons.

Incorporate password management guidelines in its IT Security Policy.

- A. Use passwords as an authentication method; issue every account (including newly issued accounts) a password.
- B. Change passwords:
 - 1. Immediately upon initial logon.
 - 2. At least every 90 days.
 - 3. With an automated mechanism to ensure passwords are changed.
 - 4. If it is suspected that the password has been compromised.
 - 5. If the password has been compromised.

6. Immediately upon the departure of personnel.
- C. The following guidelines apply to password storage and visibility:
 1. Cannot make passwords visible on a screen, hardcopy or other output device.
 2. Cannot store passwords in a clear text file, configuration files, database files, application code and system directories.
 3. Encrypt any passwords if they are required.
 4. Cannot send passwords via unsecured (i.e., unencrypted and unauthenticated) email.
 5. Cannot store passwords in written form (e.g. sticky notes) except if secured in an approved locked area.
 6. Cannot lend passwords or divulge to other persons, including individuals purporting to be system administrators.
- D. Do not compromise the entire ELC computer network by sharing passwords.
- E. Make passwords as difficult as possible so that they cannot guess what you have chosen.
- F. Use the following guidelines select strong, effective passwords:
 1. Use completely different passwords for each account when employees have multiple accounts on the same ELC system (e.g. an administrative account and a regular employee account).
 2. Do not use generic or group passwords.
 3. Do not use the same passwords at the ELC for any non-ELC computer accounts (e.g. an account on an Internet website).
 4. At a minimum, use the following protocol to create passwords:
 - Use passwords at least eight (8) characters and contain a combination of letters, numbers and special characters.
 - Cannot reuse passwords for at least six (6) changes.
 - Never assign a login account a password that is the same string as the Employee ID or that contains the Employee ID (e.g., "bob123" is not an appropriate password for employee "bob").
 - Never set any password equal to the null string (i.e., a blank password), which is equivalent to no password at all.
 - Cannot use a dictionary word in any language as passwords.
 - Cannot use passwords containing any proper noun or the name of any person, pet, child, or fictional character.
 - Cannot use passwords containing any associate serial number, Social Security Number, birth date, telephone number, or any information that could be readily guessed about the creator of the password.
 - Do not use passwords containing any simple pattern of letters or numbers, such as "xyz123."
 - Do not use passwords sharing more than three (3) sequential characters in common with a previous password (i.e., do not simply increment the number on the same password, such as fido1, fido2, etc.).
 - Use a password that is easy to remember (e.g., a phrase, line from a song, or nonsense words) and that you can type quickly.
- G. Adhere to the assignment of passwords for specific ELC systems as follow:

1. Have own password selection standard for each system that adheres to the above guidelines while being commensurate with the level of security required by the level of confidentiality of the system.
2. Configure the system to enforce the password selection criteria specified in the system criteria.
3. Avoid using the “remember password” feature on web sites and other applications.
4. If SNMP is used, follow same selection guidance provided for passwords.

5.05.02.33 Information Asset Management (IC)

Each year, thousands of information assets are lost or stolen. Often staff simply lose track of these items, resulting in exposing the ELC to unnecessary risks.

Note: ELC assigns inventory number and manages the periodic inventory of the ELC’s real property. All ELC staff must follow ELC’s protocol regarding the receipt, inventory and disposal of real property.

Not only would loss of information assets result in a financial impact on the ELC, but it could also result in unauthorized access to data stored on or accessed through these assets and could have a detrimental effect. Additionally, the tracking and management of information assets is mandated by federal and state regulations, such as the Clinger-Cohen Act.

- A. Keep a record of all information assets, including those mentioned in the scope above.
- B. Add information assets to the record upon receipt by the ELC and assigned an inventory number.
- C. For each information asset, track at least the following information:
 - The brand, model and type of asset.
 - Serial number and the ELC inventory number.
 - The person to whom the asset is assigned.
 - The location of the asset.
 - Any maintenance agreements for the asset.
 - The date of receipt of the item.
 - Grant Number.
 - Date the record was last updated or inventoried.
- D. Track the date of disposal, the method of disposal (e.g., transfer, destruction, donation, etc.) and the name of the new owner (if there is one) upon disposal of an information asset,.
- E. Perform periodic inventories to verify records and account for all information assets.
- F. Inventory each asset at least annually.

5.05.02.34 Application and Data Services Disaster Recovery (IT)

The IT Disaster Recovery Plan (DRP) will be an integral part of ELC’s overall DRP, just as Application and Data Services is an integral part of the ELC.

- A. Create the DRP,
- B. Educating employees in their roles and responsibilities
- C. Test the DRP, to see if it will ensure rapid and full recovery
- D. Fix flaws identified in testing, to better ensure the DRP will work when it is most needed.
- E. Establish an IT Disaster Recovery Plan Team (IT DRPT)

- F. Compose key personnel from each service area within the ELC and the ITSO, who will lead the DRPT.

The IT DRPT:

- A. Obtain and analyze information for development of the IT Disaster Recovery Plan by the IT DRPT lead, or designee, such as:
 - 1. Conducting a risk assessment of each of ELC's IT systems.
 - 2. Gathering IT industry information on best practices and technologies and identifying appropriate means of mitigating risk.
 - 3. Identifying and assessing external resources and their capabilities.
- B. IT DRPT meet to:
 - 1. Analyze and discuss the information obtained by the IT DRPT lead.
 - 2. Identify mission-critical systems and services, determining how long each service area can survive without those systems/services in operation (conduct a business impact analysis).
 - 3. Establish recovery priorities.
 - 4. Develop the IT Disaster Recovery.
 - 5. Submit to executive management for final approval.
- C. IT DRPT lead will:
 - 1. Ensure the IT Disaster Recovery Plan is documented and communicated to all ELC employees.
 - 2. Coordinate IT disaster recovery training with the Human Resources Manager.

IT Disaster Recovery Plan:

- A. Work with IT to ensure periodic backups of ELC information stores (databases, etc.).
- B. Contact the IT DRPT in the event of known or suspect of an IT disaster.
- C. Begin the response and recovery process in accordance with the DRP.

IT Disaster Recovery Plan Review:

- A. Prepare a response and recovery report subsequent to an actual disaster and recovery,
- B. Submit it to the IT Disaster Recovery Planning Team for review.
- C. Make revisions to the DRP based on the findings contained in the report.
- D. Test IT disaster response and recovery at least once every 12 months.
- E. Test response and recovery upon any changes to the DRP (see section 4.2).
- F. Review the IT Disaster Recovery DRP on a regular basis (every two years, at a minimum) to determine if it continues to meet the ELC's, customers' and legal/regulatory requirements.

IT Disaster Recovery Plan Revision:

- A. Update the DRP after any review of the IT Disaster Recovery Plan.
- B. Verify that the update is capable of providing the desired results by conducting a response and recovery test within one month of any updates.

5.05.02.35 Internet Usage (IC)

ELC employees will access Internet websites solely for ELC-related matters and/or other uses as described within the associated procedures. Although it is intended that the Internet be used for business purposes, access to other acceptable sites is permitted before or after approved working hours and during approved lunchtime, but not during breaks.

Examples of acceptable Internet sites are: health matters, weather, news, business topics, community activities and career advancement. Under certain circumstances, such as emergency weather conditions, access to sites such as weather and news services may be appropriate within approved working hours.

Grant use of the Internet to carry out the mission of the ELC and to promote efficiency and improve communications with internal and external customers.

Use the Internet for business purposes.

- A. IT maintains detailed records of all Internet usage for use in detecting abuse or misuse of this resource with or without notice to the employee.
- B. IT is tasked with protecting the ELC's IT assets from malicious attacks. Certain Internet websites are known to spread viruses and spyware.
- C. IT provides due diligence in blocking access to websites determined by IT to potentially cause harm to ELC IT assets.
- D. Unacceptable use of the Internet by employees includes, but is not limited to:
 - 1. Access to sites that contain obscene, hateful, pornographic, unlawful, violent or otherwise illegal material
 - 2. Sending or posting discriminatory, harassing, or threatening messages or images on the Internet.
 - 3. Using computers to perpetrate any form of fraud and/or software, film or music piracy
 - 4. Stealing, using, or disclosing someone else's password without authorization
 - 5. Downloading, copying or pirating software and electronic files that are copyrighted or without authorization
 - 6. Sharing confidential material, trade secrets, or proprietary information outside of ELC.
 - 7. Hacking into unauthorized websites
 - 8. Sending or posting information that is defamatory to the ELC, its products/services, colleagues and/or customers.
 - 9. Introducing malicious software onto the company network and/or jeopardizing the security of the organization's electronic communications systems
 - 10. Sending or posting chain letters, solicitations, or advertisements not related to business purposes or activities
 - 11. Passing off personal views as representing those of the organization
- E. Contact IT and request access if unable to access a specific website.
- F. Log requests and reasons for access.

5.05.06 Help Desk (IT)

IT Help Desk will provide support services to assist ELC employees and providers with IT-related questions/issues.

Guidelines:

Contact the Help Desk by email to report IT related issues.

Help Desk contact information:

Email: helpdesk@elcofswfl.org Telephone: 239-935-6170

The Services Desk adheres to a specific process to remediate IT related issues as defined within this manual:

- A. Ensure compliance with security requirements set forth within the ELC's "IT Security/Risk Mitigation Services Policy" (5.05.02).
- B. Document and bring to the immediate attention of the CFO to review any discrepancy between technology operations and stated security policies.
- C. Perform or grant an exception whether corrective actions are necessary by the CFO.
- D. Document and require modification to policies, standards and procedures if any exception was made.

5.05.08 Data Services (IT)

IT is responsible for the day-to-day monitoring and management of the ELC's critical data residing within approved relational databases. IT will guide personnel in the performance of the following services:

- A. Deals with the modeling of the data and treats data as an organizational resource.
- B. Use knowledge of data design, data analysis, classification and maintenance of the ELC's data and data relationships to provide direct fact-based data for the ELC's day-to-day administration of early learning services. Develops data models and data dictionaries, which, combined with transaction volume, are the raw materials for database design.
- C. Works with staff in the implementation of the various types of databases (i.e. SQL Server, Oracle) used by the ELC to secure, manipulate and control critical data. This includes:
 1. Database installation, configuration, integration, maintenance, and performance management,
 2. Data management,
 3. Data security management,
 4. Database administration includes:
 - development and design of database strategies,
 - monitor and improve database performance and capacity planning for future expansion requirements.
 - plan, coordinate and implementation of security measures on new and existing database systems to safeguard the data.
- D. Use several methods of extracting/manipulating data stored within the relational databases.
- E. Works with staff to evaluate, certify and support several middleware products used to extract useful information from the ELC's databases.

Guidelines:

Currently, the ELC has two relational databases overseen and used by IT:

1. SQL Server Database
2. Oracle Database

Support for any other relational database environments must be formally requested stating reasoning for non-conformance to above standards to the ITSO for review. Exceptions will be granted solely based upon ITSO's analysis and CFO's final approval.



Early Learning Coalition of Southwest Florida

Policy: I-PO-I12	Disbursement	Revision Date:	October 25, 2016
Effective Date:	January 25, 2017	Board Approval Date:	January 25, 2017

DISBURSEMENT

Accurate and timely payment of all invoices for the organization is an ongoing responsibility of Business Services and the purpose of detailing the requirements is critical for continuity and creating internal controls. Disbursements include all payments on purchase orders, contractor invoices, travel reimbursements, credit card transactions and online transactions. Contractors, services providers such as contracted child care providers and Coalition employees are all recipients of Coalition funds.

Cash Disbursement

I. Policy aligns with federal regulations, state statute and state rule requirements.

A. State/Federal instructions

The Coalition's policies and procedures will comply with the following federal/state laws, regulations, statutes and rules.

- Chapter 60A – General Regulations
- Section 215.422, F.S. – Payments, warrants and invoices; processing time limits; dispute resolution; agency or judicial branch compliance
- Section 287.058, F.S. – Contract document
- Rule 60A-1.002, FAC – Purchase of commodities or contract services
- Chapter 69I – Division of Auditing and Accounting
- Compliance with Rule 69I-24, F.A.C. – Payment of Vouchers by State Warrant
- Compliance with Rule 69I-40, F.A.C. – Bureau of Auditing invoice requirements
- DFS Reference Guide for State Expenditures
 - CFO Memo No. 01 (2012-13), Contract Summary Form
 - CFO Memo No. 02 (2012-13), Contract and Grant Reviews and Related Payment Processing Requirements
 - CFO Memo No. 03 (2014-15), Compliance Requirements for Agreements
 - CFO Memo No. 06 (2011-12), Contract Monitoring and Documenting Contractor Performance
 - PUR 1000 and 1001
- OEL Program Guidance PG 250.01, Other Cost Accumulator (OCA) Working Definitions
- OEL annual grant agreement Exhibit I for specified prohibited costs
- 2 CFR 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

Minimum policy disclosures – applies to all remaining topics in this section

The Coalition's policies will ensure appropriate and adequate invoice processing occurs.

B. Appropriate and adequate invoice processing policy disclosures [69I-40.002(3), F.A.C.]

1. Contractual service invoices submitted by a contractor/service provider for payment processing must clearly identify, at a minimum,
 - dates of services
 - description of the specific contract deliverables provided during the invoice period
 - quantity provided
 - payment amount specified in an agreement for the completion of the deliverable(s) provided
2. Cost reimbursement invoices must reflect the expenditures incurred by expenditure category.
3. Required information may be submitted on the invoice or in a report format along with any other information required by the terms of the agreement.
4. Written certification, from the contract/grant manager, that services were performed in accordance with the contract terms must be obtained and kept in Coalition files. [s. 287.057(14), F.S.]

C. Appropriate and adequate invoice processing controls [69I-24.003, F.A.C.; CFOM No. 06 (2011-12)]

1. The Coalition will receive deliverables and provide written certification of such before payments are made.
 - a. Approval and inspection of goods or services shall take no longer than 5 working days unless bid specifications, purchase order or contract specifies otherwise. [s. 215.422(1), F.S.]
 - b. Terms conditions must be specified and must accompany the request for payment to evidence delivery of goods/services. *If it isn't documented, it didn't happen.
 - c. Coalition must ensure that deliverables were received on time and as intended (i.e., met performance measures) before release of payment is approved/processed. Use of a delivery tracker (packing slip, copy of PO etc.) with date of receipt of goods, accounting of items received, staff signature and date.
2. The Coalition will ensure invoices have adequate documentation and are processed on a timely basis.
 - a. Documents for goods/services received are date stamped.
 - b. Review invoice for accuracy and completeness of the following details. [69I-40.002, (3), F.A.C.]
 - 1) Description of the item(s).
 - 2) Number of units.
 - 3) Cost per unit.
 - 4) Service dates coincide with invoice period.
 - 5) Minimum level of services has been provided.
 - 6) Amount invoiced coincides with the terms/conditions.
 - c. Verify any required supporting documentation has been submitted.
 - d. Review documentation to gain reasonable assurance that commodities/contractual services have been satisfactorily provided within the terms of the contract/agreement.
 - e. Complete any additional processes required by Coalition policy.
 - f. Certify the Coalition's receipt of goods/services.
 - g. Invoices shall be paid according to state rules for Prompt Payment Compliance.
 - 1) Section 215.422(3)(b), F.S., requires interest to be paid to the vendor if payment is not issued within 40 days after receipt of the invoice and receipt, inspection, and approval of the goods and services.
 - 2) DFS does not require Coalition to pay interest penalty invoices of less than \$1.00 unless the vendor asserts his right to the interest penalty payment either orally or in writing.
3. Enforce terms and conditions [s. 287.057(14)(b), F.S.; DFS-related contract manager guidance]
 - a. Coalition staff assigned contract/grant management duties are required to work with the contractor to ensure that goods/services are received as intended and contract/agreement terms are enforced.
 - b. Use performance bonds when appropriate.
 - c. Verify financial consequences are addressed.
 - d. Verify terms for liquidated damages are included (when applicable) to compensate the Coalition for any losses realized.
4. For disputes about receipt of goods/services [s. 215.422(8), F.S., Payments...disputes]
 - a. Coalition will have written procedures and instructions for staff.
 - 1) Invoice may be prorated, reduced or withheld according to the financial consequences established in contract/agreement.
 - 2) Partial or prorated payments must be made based on the deliverables that can be validated and supported by adequate documentation.
 - b. If no financial consequences are included in contract/agreement OR documentation can't be provided, the payment should be withheld until the issue is resolved or a settlement is reached.
 - c. Inform staff of settlement agreement process.
 - 1) Used when the amount owed to a provider/contractor is in dispute.
 - 2) A lengthy, cumbersome and potentially expensive process the Coalition will not be able to complete alone; legal counsel will be required.
 - 3) Required for many situations including
 - a) To settle a lawsuit, damages or legal fees;
 - b) Absence of an executed agreement;
 - c) Agreement was executed after services were rendered;
 - d) Additional services not included in the agreement were provided;
 - e) Services were rendered after the agreement expired.

II. Policy establishes controls for other disbursement procedures.

A. State/Federal instructions

The Coalition's policies and procedures will comply with the following federal/state laws, regulations, statutes and rules.

- 60A-1.016 F.A.C., Contract and Purchase Order Requirements.
- DFS Reference Guide for State Expenditures
- DFS State Travel Manual
- CFO Memo No. 06 (2016-17), *Guidance for Travel restrictions imposed by Ch. 2016-62, FL Law*
- CFO Memo No. 02 (2014-15), *State of Florida Purchasing Card Program Convenience Fees/Surcharges*
- OEL annual grant agreement Exhibit I for specified prohibited costs
- 2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
 - 2 CFR 200.302, *Financial management systems*
 - 2 CFR 200.302(7), *Financial management systems* – allowability of costs
 - 2 CFR 200.303, Internal controls
 - 2 CFR 200, Subpart E – Cost Principles
- OEL Program Guidance files
 - Program Guidance 440.10 – Office of Early Learning Match Reporting Guidance
 - Program Guidance 240.01 – Cash Management Procedures
 - Program Guidance 240.04 – School Readiness Funds Management
 - Program Guidance 240.05 – Guidance on Prior Approval Procedures
 - Program Guidance 240.06 – Reimbursement Request Requirements for Coalitions
 - Program Guidance 250.01 – Other Cost Accumulators (OCAs) Guidance.

Minimum policy disclosures – applies to all remaining topics in this section

The Coalition's policies will ensure the following disbursement controls are in place for the listed processes and activities.

B. Written procedures for allowability of costs - required contents [2 CFR Part 200.302(7)]

1. Procedures or disclosures for prohibited costs – as needed

Procedures to evaluate allowability of costs – a disclosure requirement

The Coalition applies the following questions to each transaction and documents the results.

Phase I Analysis – General considerations for allowable costs

- A. Consider requirements from federal regulations and program requirements
 1. Is the proposed cost allowable based on instructions from uniform grant guidance?
 2. Is the proposed cost consistent with the federal cost principles?
- B. Consider requirements from the federal awarding agency
 3. Is the proposed cost allowable based on agency-specific regulations?
 4. Is the proposed cost allowable based on the related terms/conditions that govern the agency's award to / agreement with OEL?
 5. Is the proposed cost consistent with the grant project performance measures or benchmarks?
- C. Consider requirements from applicable state guidance
 6. Is the proposed cost consistent with authorized grant program activities as described in the USDHHS-approved CCDF State plan?
 7. Is the proposed cost allowed by state expenditures guidance from state statutes, rules, regulations or guidance from DFS/DMS?
 8. Does the proposed cost comply with related grant program terms/conditions issued by OEL for grant awards, contracts, purchase orders and other expenditure agreements?
- D. Consider the period of performance
 9. Is the proposed cost for the allowed period of availability as defined for the funding program?
- E. Consider other oversight instructions
 10. If federal or state-level prior approval is required for the proposed cost, was this process followed?

Phase II Analysis – Specific factors affecting allowable costs

Several additional factors should be considered and documented by staff for cost transactions. The answer for each question listed here **must be “yes”** in order for staff to continue with the transaction.

F. The proposed cost(s) is/are -

11. Necessary
12. Reasonable
13. Allocable
14. In conformance with federal law and grant terms and conditions
15. Consistent with state and local policies
16. Consistently treated
17. In accordance with generally accepted accounting principles (GAAP) and other standards
Each non-federal Coalition that receives federal/state grant program funds must use accounting rules and procedures established by authoritative bodies or conventions that have evolved through custom and common usage.
18. Not used as match on another federal award
19. Net of applicable credits (2 CFR §200.406)
20. Adequately documented

Priority of compliance with federal guidance. If instances of inconsistency are noted between USDHHS program guidance (i.e., 2 CFR §300 and 45 CFR Parts 98 and 99) and the OMB uniform guidance (i.e., 2 CFR §200), the program-specific guidance instructions from USDHHS will govern and will supersede the standard instructions from 2 CFR §200 all circumstances.

Priority of compliance with state guidance. Please note State of Florida’s program-specific instructions from state statutes, rules, regulations or guidance from the Department of Management Services (DMS) or the Department of Financial Services (DFS) also apply to and govern Florida’s early learning programs. If instances of inconsistency are noted between federal level program guidance and the state’s guidance on expenditures, the state guidance from DFS and DMS will govern.

C. Use of purchase orders [60A-1.016, F.A.C., Contract and Purchase Order Requirements]

The Coalition utilizes a purchase order system. A properly completed purchase order shall be required for each purchase decision with the exception of expense reimbursements, which require the preparation of a separate form described elsewhere in this manual.

Purchase orders shall be pre-numbered, kept in a secure area in the Business Services office safe, and issued upon request from an authorized purchaser.

All purchase orders shall be recorded in a purchase order log. At the end of each accounting period, an aged outstanding purchase order report shall be prepared and distributed to each purchasing representative.

A properly completed purchase order shall contain the following information.

1. Minimum required Purchase Order policy disclosures
 - a. Contractor name, address, point of contact and phone number
 - b. Source of funding
 - c. Solicitation number (if applicable)#
 - d. Statements regarding the quantity, description, and price of goods or services ordered#
 - e. Applicable payment terms and discounts#
 - f. Date of performance, transportation/delivery#
 - g. Liquidated damages#
 - h. Catalog number, page number, etc. (if applicable)
 - i. Net price per unit, less any discount(s)
 - j. Total amount of order
 - k. Authorized signature
 - l. Date purchase order was prepared
 - m. Additional disclosures may also apply for higher dollar purchases
 - 1) Payment audit (records of costs will be available upon request)
 - 2) Payment made after written “agency” acceptance
 - 3) Payment timeframe – timely payments will be made
 - 4) Funding availability/annual appropriation
 - 5) No lobbying

- 6) Public access/public records
- 7) Conduct of business – federal/state laws govern
- 8) Conflict of interest/related party activities
- 9) Confidentiality and safeguarding information
- 10) Termination for cause – required for purchases in excess of \$10,000^
- 11) Remedies – required for purchases in excess of \$35,000^

Required disclosure element per state purchasing statutes or rules (see 60A-1.016, F.A.C.).

^Required disclosures element per federal grant program rules (see 2 CFR Part 200 Appendix II).

2. Minimum Coalition control processes required for Purchase Orders (see 60A-1.016, F.A.C.)
 - a. Secure all unused purchase orders in a safe place and restrict access to these documents.
 - b. Maintain a file and accounting system for all consecutive purchase orders issued or voided.
 - c. Maintain records of persons authorized to issue and sign each type of purchase order.
 - d. Monitor and review processes for the use of purchase orders and field purchase orders (those issued by an agency/office that is separate from the agency purchasing office (i.e., satellite offices). Rationale for method of procurement.

D. Use of credit cards/purchasing cards [2 CFR Part 200.302, *Financial management systems*; 200.303, *Internal controls*]

The Coalition recognizes there will be occasions when employees need to use a corporate credit card for travel, employee reimbursements and other purchases. The processes listed here will be followed. For more details, see Coalition Business Services Manual.

1. Minimum required credit card policy disclosures/processes
 - a. Management has a process to issue credit cards and to periodically review list of users to ensure the cards are issued to appropriate staff members.
 - b. Management has a process to ensure card users receive notice of usage guidelines. Includes safeguarding of issued cards, card holder duties, tips to avoid identity theft, and prohibited purchases/activities.
 - c. Credit cards are not used to circumvent compliance with normal requisitioning transactions.
 - d. Accounting staff prepares reconciliations and maintains adequate supporting records for disbursements and employee reimbursements made by credit card.
 - e. Management periodically reviews purchase activities and employee reimbursements made by credit cards to ensure these purchases are allowable and are not being split to stay below established spending thresholds.
 - f. An independent review and approval process is in place (potentially including a governing board member/audit committee) for purchases made by members of the management team.
 - g. Management has a process to document instances of card misuse by staff and issue notice of personnel actions taken/required (if applicable).
2. Minimum recommended credit card policy elements/staff instructions.
 - a. Coalition processes to safeguard credit cards when not in use.
 - b. Prohibited transactions are identified for staff (personal use or unauthorized purchases).
 - c. Authorized spending levels/delegation of authority.
 - d. All supporting documentation is required with the credit card transaction form, on the day that the order is placed.
 - e. Supporting documentation requirements [source: *DFS Reference Guide for State Expenditures*]
 - 1) Original receipts supporting transactions are maintained and marked/de-faced once payment has been authorized/made.
 - 2) Receipts must clearly reflect a description of the goods or services acquired, number of units, and cost per unit. The combination of several documents to provide the description, number of units, and cost per unit may be used (i.e., quote sheets, packing slips, web page screen-prints, cash register receipts, charge slips). Numerical code descriptions alone are not acceptable.
 - (a) All receipts for commodities shall be signed and dated by the cardholder to indicate the receipt, inspection, and acceptance of the goods or services.
 - (b) Receipts for services require clear evidence that services were satisfactorily received.

- 3) Acronyms and non-standard abbreviations for programs or organizational units within the Coalition should not be used in the supporting documentation unless an explanation is also included.
 - f. Monthly reviews by management and scheduled reviews by Board Treasurer at Finance meetings.
 - g. Any misuse will be reviewed with needed disciplinary actions by the Chief Executive Officer.
3. Additional requirements for credit cards [DFS CFO Memo No. 02 (2014-15)]
- A. State statute prohibits sellers and lessors from charging convenience fees and surcharges for the use of credit cards.
 - B. Such costs are unallowable, and should not be submitted for reimbursement.
 - C. Florida law also provides that any person who violates this provision is guilty of a second degree misdemeanor.
 - D. If this activity occurs additional vendor notifications may be required.
- E. Travel [2 CFR Part 200.302, *Financial management systems*; 200.303, *Internal controls*; DFS Reference Guide, DFS State Travel Manual; s. 112.061, F.S. *Per diem and travel expenses of public officers, employees, and authorized persons*; and CFO Memo No. 06 (2016-17)]**
- 1. Minimum required travel policy disclosures
 - a. Travel expenses will be documented and reimbursed based on applicable state travel rules (includes DFS Reference Guide, State Travel Manual CFO Memos and OEL guidance).
 - b. Request for Travel reimbursement is due to Business Services within 5 working days after the end of the period. Travel reimbursement submitted late will not be reimbursed.
 - c. Management has process in place to ensure proper authorization, review, approval, and guidelines to submit adequate supporting records. Includes blanket travel authorizations (if used), requirement to use state-issued travel authorization, travel advances and travel reimbursement forms that include all required signatures/statements from the traveler, requirement to use most economical and efficient method for each travel event.
 - d. Management has a process to ensure reimbursements do not exceed allowable amounts. Includes detail for allowable mileage reimbursement amounts, meal rates from statutes, travel per diem calculations, and recent travel restrictions to limit allowable daily room rates to \$150 per day per traveler. Also includes processes to ensure only reasonable and necessary business-related costs are incurred.
 - e. An independent review and approval process is in place (potentially including a governing board member/audit committee) for costs incurred by members of the management team.
 - f. Management has a process to document instances misuse by staff and issue notice of personnel actions taken/required (if applicable).



Care Code	Description	Minimum # of Children Served
(INF)	<12 MTH	633
(TOD)	12<24 MTH	1259
(2YR)	24 <36 MTH	1583
(PR3)	36 <48 MTH	1682
(PR4)	48 <60 MTH	1592
(PR5)	60 <72 MTH	1041
(SCH)	In School	2042
(SPCR)	Special Needs	0
(SPTN)	Special Needs Teen	0



Early Learning Coalition of Southwest Florida

Policy: 404.2 Single Point of Entry

Revision Date: October 10, 2017

Board Approval Date:

Effective Date:

POLICY:

The Coalition shall comply with Section 1002.82, F.S., requiring the statewide data information program to include a single point of entry.

“Single point of entry” means the statewide information system (SIS) that allows a parent to submit an application for enrollment in the School Readiness or Voluntary Pre-Kindergarten programs to the Early Learning Coalition.

Citation: [S. 1002.82, F.S.](#)

Associated Documents:

Reference #:

Replaces:



Early Learning Coalition of Southwest Florida

Policy: Wait List Implementation

Revision Date: 09-05-2017
Board Approval Date:
Effective Date:

POLICY:

The Coalition shall establish a procedure in preliminary screening for eligibility to determine whether or not a family is potentially eligible for services. The preliminary screening shall be at a minimum:

- Family's statement of income
- Family size and
- Type of service requested

If funds are available, a Coalition shall enroll eligible children, including those from its wait list, according to the eligibility priorities in s. 1002.87(1), F.S., (s.1002.87(3), F.S.).

The Coalition shall establish a methodology for prioritizing the wait list by the child's legal name, age, probable eligibility category and type of service requested.

The Coalition shall have procedures for removing a child's name from the wait list upon placement authorization.

If a parent has not updated their SR Application within six months, the Statewide System will inactivate the application.

The policy establishes that an unborn child is not eligible for the wait list.

Citations: s. 1002.87 F.S.

Associated Documents:

Reference#:

Replaces:



Early Learning Coalition of Southwest Florida

Procedure: Wait List Implementation

Revision Date: 07-20-15
 Management Approval Date:
 Effective Date:

PROCEDURE:

- Some families automatically qualify for child care services and some do not. Children referred for services either through Child Care Executive Partnership (CCEP), Work Force Development Board, ACT, Department of Children's and Families (DCF) or their contracted providers are not subject to the waiting list upon receipt of a completed referral form.

The Coalition utilizes a waiting list which is a management tool for filling available child care slots by:

- Placing children on the waiting list prioritized according to [s. 1002.87\(1\), F.S.](#)
- Maintaining all potentially eligible applicants in the Family Portal
- Serving clients referred for services either through Child Care Executive Partnership (CCEP), Work Force Development Board, ACT, Department of Children and Families (DCF) or their contracted providers who are not subject to the waiting list upon receipt of a completed referral form

To screen children on the wait list:

- Conduct a preliminary screening for eligibility to determine whether or not a family is potentially eligible for services.
- Screen at a minimum the family's statement of income, family size, and type of service requested
- Ask family to provide documentation of at least one pay stub or school schedule or other required documentation before application will be validated or placed as active. More documentation may be requested if needed.
- Give family 10 days to comply with submission of documentation or their application will be rejected
- An unborn child is not eligible for the waiting list

Following the preliminary screening for the wait list:

- Give eligible applicant a qualification letter stating the date they applied and the 6 month (180) days recertification date
- Give family at least 10 days to contact Coalition staff to provide documentation of any subsequent changes
- Offer resources and referrals as needed

Ineligible applicants:

- Advise of the reason for the ineligibility by letter, email, telephone or in person
- Refer applicants and children to other services which may be appropriate for their needs

To enter children on the wait list:

- Request or enter user name and password from the Family Portal Administrator
- Go to family portal admin link as directed by Portal Administrator
- Click on "Search SR Applications"
- Click on "Confirmation Number"
- Review application to see if family falls within OEL's current guidelines by clicking on "Verify" to review document submitted
- If family falls within OEL's SR guidelines, then click "Verified" and click "Save"
- Click on "Change Application Status" and select "Active" from the Status drop down menu.

- Click “Save”
 - If family does not fall within OEL’s SR guidelines, then reject application.
 - If client needs to submit additional documentation, then email family requesting additional documentation.
 - Click on Save at the bottom of screen
- Place all eligible children on the waiting list, by the child’s legal name, age, probable eligibility category, and type of service requested
 - Prioritize according to OEL’s eligibility guidelines (see 404.1 SR Eligibility and Enrollment Procedure)
 - Families are required to confirm eligibility for the wait list every six (6) months.
 - Send family wait list redetermination reminder at least 30 days before their 6 month verification date
 - Revalidate each name on the waiting list every six (6) months if still eligible.
 - Inform family to respond by fax, phone, email, in person, or upload document into family portal to provide proof of eligibility

To maintain children on the wait list:

- Inform applicant that in order to maintain their place on the waiting list, they must apprise the Coalition of any changes:
 - address
 - telephone number
 - family size
 - any change to employment
 - school enrollment
- Remove names from the waiting list for:
 - authorization for placement
 - upon loss of contact
 - no response
 - failure to supply information requested in allotted timeframe
 - when child is found ineligible
 - purpose for care no longer exists
- Revalidate application in UWL every time family complies with submitting supporting documentation to remain on the wait list within the specified time frame. This should be done in the family portal once this feature is activated.
- Review each county once per month to ensure there are no duplicates entries of names and the number of waiting families is accurate
- Inactivate any duplicate accounts
- Run and complete all other wait list reports as needed.

Actual certification of eligibility will be conducted prior to authorization for placement, which will be based on available funding and capacity.

Citation: [s. 1002.87\(1\), F.S.](#)

Associated Documents:

Reference #:

Replaces:



Early Learning Coalition of Southwest Florida

Policy: SR Eligibility and Enrollment

Revision Date: October 10, 2017

Board Approval Date:

Effective Date:

POLICY:

The Coalition shall have clearly defined and written eligibility enrollment procedures that reflect the mandated eligibility priority categories for serving children in the SR Program.

The Coalition shall determine child eligibility based on s. 1002.87, F.S.

The Coalition shall have written procedures that comply with s. 1002.87(7), F.S., and the OEL Grant Agreement for disenrolling SR children from SR services.

The Coalition's written eligibility determination and redetermination procedures shall align with rules and statutes.

The Coalition shall annually reevaluate each child's eligibility. Upon reevaluation, a child may not continue to receive SR Program services if he or she is no longer eligible under this section.

Citation: [s. 1002.87, F.S.](#) ; [s. 1002.85, F.S.](#) ; [s. 1002.84, F.S.](#) ; [s. 1002.81, F.S.](#) and [Chapter 6M-4, FAC.](#)

Associated Documents:

Reference #:

Replaces:



Early Learning Coalition of Southwest Florida

Policy: Parent Access and Choice

Revision Date: May 27, 2015

Board Approval Date: June 17, 2015

Effective Date: July 1, 2015

POLICY:

The Coalition procedure shall require and document that it will inform parents about a parent's right to choose from a variety of legally operating child care categories. (45 CFR s. 98.30; s. 1002.82(2)(b), F.S.; CCDF Plan 2.6)

The Coalition procedure shall require and document that the Coalition informs parents about a parent's right to unlimited access to his or her child during normal hours of provider operation and whenever the child is in the provider's care. (45 C.F.R. s. 98.31; CCDF Plan 2.6.3)

Citation: 45 CFR s. 98.30; s. 1002.82(2) (b), F.S.; CCDF Plan 2.6 and 2.6.3; 45 C.F.R. s. 98.31

Associated Documents:

Reference #:

Replaces:



Early Learning Coalition of Southwest Florida

Policy: Sliding Fee Scale and Fee Waiver

Revision Date: May 27, 2015

Board Approval Date: June 17, 2015

Effective Date: July 1, 2015

POLICY:

The Coalition shall base its sliding fee scale on the income thresholds from the most current OEL release of the federal property level (FPL).

The Coalition shall provide justification of how the sliding fee scale meets the federal requirement that the copayment be affordable if the Coalition's proposed sliding fee scale does exceed 10 percent of family income.

The Coalition shall seek OEL's approval prior to implementation.

The Coalition may only waive family copayments on a case-by-case basis.

The Coalition shall establish special circumstances for which it will waive family copayments that are consistent with the examples from s. 1002.84(8), F.S., and Rule 6M-4.400(1) and (2), FAC.

Board approved special circumstances for Fee Waiver:

- at-risk child
- temporarily waive the copayment for a child whose family experiences a natural disaster
- an event that limits the parent's ability to pay, such as incarceration, placement in residential treatment, or becoming homeless,
- an emergency situation such as a household fire or burglary,
- while the parent is participating in parenting classes
- others as determined by CEO

The Coalition shall submit the sliding fee scale in the format prescribed by OEL.

Citation: s. 1002.84(8), F.S., and Rule 6M-4.400(1) and (2), FAC.

Associated Documents:

Reference #:

Replaces:

**Florida's Office of Early Learning
 SLIDING FEE SCHEDULE**

DAILY FEE		----- Annual Gross Income - Number of persons in Family -----															
Full-Time	Part-Time	FPL as indicated unless exceeds	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
0.88	0.44	85% SMI	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
		50%FPL	6,030	8,120	10,210	12,300	14,390	16,480	18,570	20,660	22,750	24,840	26,930	29,020	31,110	33,200	35,290
1.76	0.88		6,031	8,121	10,211	12,301	14,391	16,481	18,571	20,661	22,751	24,841	26,931	29,021	31,111	33,201	35,291
		75%FPL	9,045	12,180	15,315	18,450	21,585	24,720	27,855	30,990	34,125	37,260	40,395	43,530	46,665	49,800	52,935
2.64	1.32		9,046	12,181	15,316	18,451	21,586	24,721	27,856	30,991	34,126	37,261	40,396	43,531	46,666	49,801	52,936
		FPL	12,059	16,239	20,419	24,599	28,779	32,959	37,139	41,319	45,499	49,679	53,859	58,039	62,219	66,399	70,579
3.52	1.76		12,060	16,240	20,420	24,600	28,780	32,960	37,140	41,320	45,500	49,680	53,860	58,040	62,220	66,400	70,580
		FPL	14,070	18,947	23,824	28,701	33,578	38,454	43,331	48,208	53,085	57,962	62,838	67,715	72,592	77,469	82,346
4.40	2.20		14,071	18,948	23,825	28,702	33,579	38,455	43,332	48,209	53,086	57,963	62,839	67,716	72,593	77,470	82,347
		85% SMI	16,081	21,654	27,228	32,802	38,375	43,949	49,522	55,096	60,670	66,243	71,817	77,391	82,964	88,538	94,112
5.28	2.64		16,082	21,655	27,229	32,803	38,376	43,950	49,523	55,097	60,671	66,244	71,818	77,392	82,965	88,539	94,113
		85% SMI	18,090	24,360	30,630	36,900	43,170	49,440	55,710	61,980	68,250	74,520	80,790	87,060	93,330	99,600	105,870
		150%FPL	18,091	24,361	30,631	36,901	43,171	49,441	55,711	61,981	68,251	74,521	80,791	87,061	93,331	99,601	105,871
6.16	3.08		18,793	25,307	31,820	38,334	44,848	51,362	57,875	64,389	70,903	77,416	83,930	90,444	96,957	103,471	109,985
		FPL	18,794	25,308	31,821	38,335	44,849	51,363	57,876	64,390	70,904	77,417	83,931	90,445	96,958	103,472	109,986
7.04	3.52		19,496	26,254	33,011	39,768	46,526	53,283	60,041	66,798	73,555	80,313	87,070	93,827	100,585	107,342	114,100
		85% SMI	19,497	26,255	33,012	39,769	46,527	53,284	60,042	66,799	73,556	80,314	87,071	93,828	100,586	107,343	114,101
7.92	3.96		20,199	27,200	34,201	41,203	48,204	55,205	62,206	69,207	76,208	83,209	90,210	97,211	104,212	111,213	118,214
		85% SMI	20,200	27,201	34,202	41,204	48,205	55,206	62,207	69,208	76,209	83,210	90,211	97,212	104,213	111,214	118,215
8.80	4.40		20,902	28,147	35,392	42,637	49,881	57,126	64,371	71,616	78,861	86,105	93,350	100,595	107,840	115,084	122,329
		FPL	20,903	28,148	35,393	42,638	49,882	57,127	64,372	71,617	78,862	86,106	93,351	100,596	107,841	115,085	122,330
9.69	4.84		21,605	29,094	36,582	44,071	51,559	59,048	66,536	74,025	81,513	89,002	96,490	103,979	111,467	118,956	126,444
		85% SMI	21,606	29,095	36,583	44,072	51,560	59,049	66,537	74,026	81,514	89,003	96,491	103,980	111,468	118,957	126,445
10.56	5.28		22,311	30,044	37,777	45,510	53,243	60,976	68,709	76,442	84,175	91,908	99,641	107,374	115,107	122,840	130,573
		185%FPL	22,312	30,045	37,778	45,511	53,244	60,977	68,710	76,443	84,176	91,909	99,642	107,375	115,108	122,841	130,574
11.44	5.72		23,216	31,262	39,309	47,355	55,402	63,448	71,495	79,541	87,588	95,634	103,681	111,727	119,774	127,820	135,867
		85% SMI	23,217	31,263	39,310	47,356	55,403	63,449	71,496	79,542	87,589	95,635	103,682	111,728	119,775	127,821	135,868
12.32	6.16		24,120	32,480	40,840	49,200	57,560	65,920	74,280	82,640	91,000	99,360	107,720	116,080	124,440	132,800	141,160
		200%FPL	24,121	32,481	40,841	49,201	57,561	65,921	74,281	82,641	91,001	99,361	107,721	116,081	124,441	132,801	141,161
13.20	6.60		25,929	34,916	43,903	52,890	61,877	70,864	79,851	88,838	97,825	106,812	115,799	124,786	133,773	142,760	151,747
		85% SMI	25,930	34,917	43,904	52,891	61,878	70,865	79,852	88,839	97,826	106,813	115,800	124,787	133,774	142,761	151,748
14.08	7.04		27,738	37,352	46,966	56,580	66,194	75,808	85,422	95,036	104,650	114,264	123,878	133,492	143,106	152,720	162,334
		FPL	27,739	37,353	46,967	56,581	66,195	75,809	85,423	95,037	104,651	114,265	123,879	133,493	143,107	152,721	162,335
14.96	7.48		29,898	39,098	48,297	57,497	66,696	75,895									
		85% SMI															

Parents receiving hourly care pay up to the part time fee.
 Note: 10% Parent Fee was calculated using 260 days.
 Refer to 6M-4.400, F.A.C.

2017 Poverty Level (FPL) effective January 26, 2017

Income 85% State Median Income: Upper threshold for eligibility

Please answer the following questions:

- (1) If there is a sibling discount what is the percentage? Second and all additional children pay a reduced fee. Parents pay 75% of the co-payment rate for siblings.
- (2) If any family pays more than 10% of their gross income for child care, please complete and attach the justification form that explains how the fees will not limit parent access to services. The Sliding Fee Schedule is above 10% for some of the higher annual gross incomes especially for a one person household. There are minimal clients in a One Person Household with this amount of annual gross income. When this is encountered, the rates are reduced to be within 10% of annual gross income (Family Resource Advisors re-calculate using the 10% Cap Fee formula).
- (3) Describe at what points during the year school age schedules are adjusted. For example, beginning of summer, end of summer, spring break, etc. Every month according to the school age calendar for the respective county.



Pre and Post Assessment for School Readiness

Procedure 220.10 P. 5

Enrollment

1. Although School Readiness providers are not required by the Coalition to complete pre and post assessments, they are expected to choose an approved curriculum including ongoing assessment of the children. The Coalition supports the use of Teaching Strategies for this developmental assessment of SR children and will purchase the portfolios for the SR children in an SR program.
2. In mid-August through September of each program year a review is completed and each new facility and/or director is contacted to discuss their assessment plan and offer support.
3. For those facilities utilizing Teaching Strategies, the facility is added to the online system and the facility administrator adds their teachers and children online.
4. Facilities choosing an alternative method are referred for follow-up with their mentor to ensure they receive assistance if needed when the center or home is monitored.
5. Throughout the year as new facilities and directors are added they are contacted to review their assessment plan.

Assessment Process

1. Children birth up to 3 years have objectives 1 through 23 completed. Children three through 5 years have objectives 1 through 36 completed plus 37 and 38 for English Language Learners.
2. Observation notes are maintained onsite or on Teaching Strategies that support the checkpoints entered for children.
3. Checkpoints are completed for fall in October, winter in February and spring in May. (Dates TBA)
4. School Readiness children in care a minimum of 6 weeks prior to the checkpoint season date are included in the assessment group.

Training

1. Classes on observation, documentation, analysis and planning as well as an administration class are offered by the Coalition.

2. For providers choosing the Teaching Strategies system, online module training and inter-rater reliability certification is available.
3. Phone and in-person TA are available to providers

Reporting

1. A snapshot report of all children's beginning developmental and learning levels in social-emotional, physical, language, cognitive, literacy, and mathematics is completed in the fall, winter and spring.
2. In the spring, a growth report which demonstrates gains for children remaining in care from fall to spring is completed.

Approved by Susan Block CEO 10/10/2017

EARLY LEARNING COALITION OF SOUTHWEST FLORIDA

Maximum Payment Rate

Serving the counties of Collier, Glades, Hendry, and Lee



County: Collier

Payment Rate Schedule -Effective 11/1/16

Full-Time Rates												
Care Level	Licensed or Exempt Centers		Gold Seal Centers		Licensed FCCH		Gold Seal FCCH		Registered FCCH		Informal Providers	
	Daily	Weekly	Daily	Weekly	Daily	Weekly	Daily	Weekly	Daily	Weekly	Daily	Weekly
Infant (<12 months)	\$32.24	\$161.20	\$37.08	\$185.40	\$20.80	\$104.00	\$23.92	\$119.60	\$24.96	\$124.80	\$10.00	\$50.00
Toddler (12 to <24 mths)	\$28.08	\$140.40	\$32.29	\$161.45	\$20.80	\$104.00	\$23.92	\$119.60	\$20.80	\$104.00	\$10.00	\$50.00
2 yr (24 to < 36 mths)	\$22.00	\$110.00	\$25.30	\$126.50	\$20.00	\$100.00	\$23.00	\$115.00	\$18.00	\$90.00	\$10.00	\$50.00
PR3 (36 to < 48 mths)	\$21.60	\$108.00	\$24.84	\$124.20	\$20.00	\$100.00	\$23.00	\$115.00	\$18.00	\$90.00	\$10.00	\$50.00
PR4 (48 to < 60 mths)	\$21.60	\$108.00	\$24.84	\$124.20	\$20.00	\$100.00	\$23.00	\$115.00	\$18.00	\$90.00	\$10.00	\$50.00
PR5 (60 to < 72 mths)	\$21.60	\$108.00	\$24.84	\$124.20	\$20.00	\$100.00	\$23.00	\$115.00	\$18.00	\$90.00	\$10.00	\$50.00
Special Needs	\$31.00	\$155.00	\$35.65	\$178.25	\$20.00	\$100.00	\$23.00	\$115.00	\$24.00	\$120.00	\$10.00	\$50.00
Sch (in school)	\$18.20	\$91.00	\$20.93	\$104.65	\$18.00	\$90.00	\$20.70	\$103.50	\$16.00	\$80.00	\$9.00	\$45.00

Part-Time Rates												
Care Level	Licensed or Exempt Centers		Gold Seal Centers		Licensed FCCH		Gold Seal FCCH		Registered FCCH		Informal Providers	
	Daily	Weekly	Daily	Weekly	Daily	Weekly	Daily	Weekly	Daily	Weekly	Daily	Weekly
Infant (<12 months)	\$24.18	\$120.90	\$27.81	\$139.05	\$15.60	\$78.00	\$17.94	\$89.70	\$18.72	\$93.60	\$7.50	\$37.50
Toddler (12 to <24 mths)	\$21.06	\$105.30	\$24.22	\$121.10	\$15.60	\$78.00	\$17.94	\$89.70	\$15.60	\$78.00	\$7.50	\$37.50
2 yr (24 to < 36 mths)	\$16.50	\$82.50	\$18.98	\$94.90	\$15.00	\$75.00	\$17.25	\$86.25	\$13.50	\$67.50	\$7.50	\$37.50
PR3 (36 to < 48 mths)	\$16.20	\$81.00	\$18.63	\$93.15	\$15.00	\$75.00	\$17.25	\$86.25	\$13.50	\$67.50	\$7.50	\$37.50
PR4 (48 to < 60 mths)	\$16.20	\$81.00	\$18.63	\$93.15	\$15.00	\$75.00	\$17.25	\$86.25	\$13.50	\$67.50	\$7.50	\$37.50
PR5 (60 to < 72 mths)	\$16.20	\$81.00	\$18.63	\$93.15	\$15.00	\$75.00	\$17.25	\$86.25	\$13.50	\$67.50	\$7.50	\$37.50
Special Needs	\$23.25	\$116.25	\$26.74	\$133.70	\$15.00	\$75.00	\$17.25	\$86.25	\$18.00	\$90.00	\$7.50	\$37.50
Sch (in school)	\$13.65	\$68.25	\$15.70	\$78.50	\$13.50	\$67.50	\$15.53	\$77.65	\$12.00	\$60.00	\$6.75	\$33.75

Additional Information:

Has your coalition adopted a sibling discount rate? Yes, clients to pay 75% of the co-payment rate for siblings

EARLY LEARNING COALITION OF SOUTHWEST FLORIDA

Maximum Payment Rate

Serving the counties of Collier, Glades, Hendry, and Lee



County: **Glades**

Payment Rate Schedule (Effective July 1, 2011 - Gold Seal Rate Decrease)

Full-Time Rates												
Care Level	Licensed or Exempt Centers		Gold Seal Centers		Licensed FCCH		Gold Seal FCCH		Registered FCCH		Informal Providers	
	Daily	Weekly	Daily	Weekly	Daily	Weekly	Daily	Weekly	Daily	Weekly	Daily	Weekly
Infant (<12 months)	\$33.60	\$168.00	\$38.64	\$193.20	\$25.00	\$125.00	\$28.75	\$143.75	\$20.00	\$100.00	\$12.50	\$62.50
Toddler (12 to <24 mths)	\$31.20	\$156.00	\$35.88	\$179.40	\$24.00	\$120.00	\$27.60	\$138.00	\$20.00	\$100.00	\$12.00	\$60.00
2 yr (24 to < 36 mths)	\$28.80	\$144.00	\$33.12	\$165.60	\$24.00	\$120.00	\$27.60	\$138.00	\$20.00	\$100.00	\$12.00	\$60.00
PR3 (36 to < 48 mths)	\$28.80	\$144.00	\$33.12	\$165.60	\$24.00	\$120.00	\$27.60	\$138.00	\$20.00	\$100.00	\$12.00	\$60.00
PR4 (48 to < 60 mths)	\$28.80	\$144.00	\$33.12	\$165.60	\$22.00	\$110.00	\$25.30	\$126.50	\$20.00	\$100.00	\$11.00	\$55.00
PR5 (60 to < 72 mths)	\$28.80	\$144.00	\$33.12	\$165.60	\$22.00	\$110.00	\$25.30	\$126.50	\$20.00	\$100.00	\$11.00	\$55.00
Special Needs	\$33.60	\$168.00	\$38.64	\$193.20	\$25.00	\$125.00	\$28.75	\$143.75	\$20.00	\$100.00	\$12.50	\$62.50
Sch (in school)	\$21.60	\$108.00	\$24.84	\$124.20	\$20.00	\$100.00	\$23.00	\$115.00	\$16.00	\$80.00	\$10.00	\$50.00

Part-Time Rates												
Care Level	Licensed or Exempt Centers		Gold Seal Centers		Licensed FCCH		Gold Seal FCCH		Registered FCCH		Informal Providers	
	Daily	Weekly	Daily	Weekly	Daily	Weekly	Daily	Weekly	Daily	Weekly	Daily	Weekly
Infant (<12 months)	\$25.20	\$126.00	\$28.98	\$144.90	\$18.75	\$93.75	\$21.56	\$107.80	\$15.00	\$75.00	\$9.40	\$47.00
Toddler (12 to <24 mths)	\$23.40	\$117.00	\$26.91	\$134.55	\$18.00	\$90.00	\$20.70	\$103.50	\$15.00	\$75.00	\$9.00	\$45.00
2 yr (24 to < 36 mths)	\$21.60	\$108.00	\$24.84	\$124.20	\$18.00	\$90.00	\$20.70	\$103.50	\$15.00	\$75.00	\$9.00	\$45.00
PR3 (36 to < 48 mths)	\$21.60	\$108.00	\$24.84	\$124.20	\$18.00	\$90.00	\$20.70	\$103.50	\$15.00	\$75.00	\$9.00	\$45.00
PR4 (48 to < 60 mths)	\$21.60	\$108.00	\$24.84	\$124.20	\$16.50	\$82.50	\$18.98	\$94.90	\$15.00	\$75.00	\$8.00	\$40.00
PR5 (60 to < 72 mths)	\$21.60	\$108.00	\$24.84	\$124.20	\$16.50	\$82.50	\$18.98	\$94.90	\$15.00	\$75.00	\$8.00	\$40.00
Special Needs	\$25.20	\$126.00	\$28.98	\$144.90	\$18.75	\$93.75	\$21.56	\$107.80	\$15.00	\$75.00	\$9.40	\$47.00
Sch (in school)	\$16.20	\$81.00	\$18.63	\$93.15	\$15.00	\$75.00	\$17.25	\$86.25	\$12.00	\$60.00	\$8.00	\$40.00

Additional Information:

Has your coalition adopted a sibling discount rate? Yes, clients to pay 75% of the co-payment rate for siblings

EARLY LEARNING COALITION OF SOUTHWEST FLORIDA

Maximum Payment Rate

Serving the counties of Collier, Glades, Hendry, and Lee



County: **Hendry**

Payment Rate Schedule (Effective July 1, 2011 - Gold Seal Rate Decrease)

Full-Time Rates												
Care Level	Licensed or Exempt Centers		Gold Seal Centers		Licensed FCCH		Gold Seal FCCH		Registered FCCH		Informal Providers	
	Daily	Weekly	Daily	Weekly	Daily	Weekly	Daily	Weekly	Daily	Weekly	Daily	Weekly
Infant (<12 months)	\$28.90	\$144.50	\$33.24	\$166.20	\$25.00	\$125.00	\$28.75	\$143.75	\$20.00	\$100.00	\$12.50	\$62.50
Toddler (12 to <24 mths)	\$26.85	\$134.25	\$30.88	\$154.40	\$24.00	\$120.00	\$27.60	\$138.00	\$20.00	\$100.00	\$12.00	\$60.00
2 yr (24 to < 36 mths)	\$24.75	\$123.75	\$28.46	\$142.30	\$20.65	\$103.25	\$23.75	\$118.75	\$17.20	\$86.00	\$10.30	\$51.50
PR3 (36 to < 48 mths)	\$24.75	\$123.75	\$28.46	\$142.30	\$20.65	\$103.25	\$23.75	\$118.75	\$17.20	\$86.00	\$10.30	\$51.50
PR4 (48 to < 60 mths)	\$24.75	\$123.75	\$28.46	\$142.30	\$18.90	\$94.50	\$21.74	\$108.70	\$17.20	\$86.00	\$9.45	\$47.25
PR5 (60 to < 72 mths)	\$24.75	\$123.75	\$28.46	\$142.30	\$18.90	\$94.50	\$21.74	\$108.70	\$17.20	\$86.00	\$9.45	\$47.25
Special Needs	\$28.90	\$144.50	\$33.24	\$166.20	\$25.00	\$125.00	\$28.75	\$143.75	\$20.00	\$100.00	\$12.50	\$62.50
Sch (in school)	\$18.60	\$93.00	\$21.39	\$106.95	\$17.20	\$86.00	\$19.78	\$98.90	\$15.00	\$75.00	\$8.60	\$43.00

Part-Time Rates												
Care Level	Licensed or Exempt Centers		Gold Seal Centers		Licensed FCCH		Gold Seal FCCH		Registered FCCH		Informal Providers	
	Daily	Weekly	Daily	Weekly	Daily	Weekly	Daily	Weekly	Daily	Weekly	Daily	Weekly
Infant (<12 months)	\$21.65	\$108.25	\$24.90	\$124.50	\$18.75	\$93.75	\$21.56	\$107.80	\$15.00	\$75.00	\$9.40	\$47.00
Toddler (12 to <24 mths)	\$20.10	\$100.50	\$23.12	\$115.60	\$18.00	\$90.00	\$20.70	\$103.50	\$15.00	\$75.00	\$9.00	\$45.00
2 yr (24 to < 36 mths)	\$18.60	\$93.00	\$21.39	\$106.95	\$15.50	\$77.50	\$17.83	\$89.15	\$12.90	\$64.50	\$7.75	\$38.75
PR3 (36 to < 48 mths)	\$18.60	\$93.00	\$21.39	\$106.95	\$15.50	\$77.50	\$17.83	\$89.15	\$12.90	\$64.50	\$7.75	\$38.75
PR4 (48 to < 60 mths)	\$18.60	\$93.00	\$21.39	\$106.95	\$14.20	\$71.00	\$16.33	\$81.65	\$12.90	\$64.50	\$6.90	\$34.50
PR5 (60 to < 72 mths)	\$18.60	\$93.00	\$21.39	\$106.95	\$14.20	\$71.00	\$16.33	\$81.65	\$12.90	\$64.50	\$6.90	\$34.50
Special Needs	\$21.65	\$108.25	\$24.90	\$124.50	\$18.75	\$93.75	\$21.56	\$107.80	\$15.00	\$75.00	\$9.40	\$47.00
Sch (in school)	\$13.95	\$69.75	\$16.04	\$80.20	\$12.90	\$64.50	\$14.84	\$74.20	\$11.25	\$56.25	\$6.90	\$34.50

Additional Information:

Has your coalition adopted a sibling discount rate? Yes, clients to pay 75% of the co-payment rate for siblings

EARLY LEARNING COALITION OF SOUTHWEST FLORIDA

Maximum Payment Rate

Serving the counties of Collier, Glades, Hendry, and Lee



County: Lee

Payment Rate Schedule (Effective July 1, 2011 - Gold Seal Rate Decrease)

Full-Time Rates												
Care Level	Licensed or Exempt Centers		Gold Seal Centers		Licensed FCCH		Gold Seal FCCH		Registered FCCH		Informal Providers	
	Daily	Weekly	Daily	Weekly	Daily	Weekly	Daily	Weekly	Daily	Weekly	Daily	Weekly
Infant (<12 months)	\$28.00	\$140.00	\$32.20	\$161.00	\$25.00	\$125.00	\$28.75	\$143.75	\$24.00	\$120.00	\$12.50	\$62.50
Toddler (12 to <24 mths)	\$26.00	\$130.00	\$29.90	\$149.50	\$23.00	\$115.00	\$26.45	\$132.25	\$20.00	\$100.00	\$11.50	\$57.50
2 yr (24 to < 36 mths)	\$22.60	\$113.00	\$25.99	\$129.95	\$20.00	\$100.00	\$23.00	\$115.00	\$19.00	\$95.00	\$10.00	\$50.00
PR3 (36 to < 48 mths)	\$21.00	\$105.00	\$24.15	\$120.75	\$20.00	\$100.00	\$23.00	\$115.00	\$18.00	\$90.00	\$10.00	\$50.00
PR4 (48 to < 60 mths)	\$20.40	\$102.00	\$23.46	\$117.30	\$20.00	\$100.00	\$23.00	\$115.00	\$17.00	\$85.00	\$10.00	\$50.00
PR5 (60 to < 72 mths)	\$20.40	\$102.00	\$23.46	\$117.30	\$20.00	\$100.00	\$23.00	\$115.00	\$17.00	\$85.00	\$10.00	\$50.00
Special Needs	\$28.00	\$140.00	\$32.20	\$161.00	\$25.00	\$125.00	\$28.75	\$143.75	\$24.00	\$120.00	\$12.50	\$62.50
Sch (in school)	\$18.20	\$91.00	\$20.93	\$104.65	\$18.00	\$90.00	\$20.70	\$103.50	\$16.00	\$80.00	\$9.00	\$45.00

Part-Time Rates												
Care Level	Licensed or Exempt Centers		Gold Seal Centers		Licensed FCCH		Gold Seal FCCH		Registered FCCH		Informal Providers	
	Daily	Weekly	Daily	Weekly	Daily	Weekly	Daily	Weekly	Daily	Weekly	Daily	Weekly
Infant (<12 months)	\$21.00	\$105.00	\$24.15	\$120.75	\$18.75	\$93.75	\$21.56	\$107.80	\$18.00	\$90.00	\$9.38	\$46.90
Toddler (12 to <24 mths)	\$19.50	\$97.50	\$22.43	\$112.15	\$17.25	\$86.25	\$19.84	\$99.20	\$15.00	\$75.00	\$8.63	\$43.15
2 yr (24 to < 36 mths)	\$16.95	\$84.75	\$19.49	\$97.45	\$15.00	\$75.00	\$17.25	\$86.25	\$14.25	\$71.25	\$7.50	\$37.50
PR3 (36 to < 48 mths)	\$15.75	\$78.75	\$18.11	\$90.55	\$15.00	\$75.00	\$17.25	\$86.25	\$13.50	\$67.50	\$7.50	\$37.50
PR4 (48 to < 60 mths)	\$15.30	\$76.50	\$17.60	\$88.00	\$15.00	\$75.00	\$17.25	\$86.25	\$12.75	\$63.75	\$7.50	\$37.50
PR5 (60 to < 72 mths)	\$15.30	\$76.50	\$17.60	\$88.00	\$15.00	\$75.00	\$17.25	\$86.25	\$12.75	\$63.75	\$7.50	\$37.50
Special Needs	\$21.00	\$105.00	\$24.15	\$120.75	\$18.75	\$93.75	\$21.56	\$107.80	\$18.00	\$90.00	\$9.38	\$46.90
Sch (in school)	\$13.65	\$68.25	\$15.70	\$78.50	\$13.50	\$67.50	\$15.53	\$77.65	\$12.00	\$60.00	\$6.75	\$33.75

Additional Information:

Has your coalition adopted a sibling discount rate? Yes, clients to pay 75% of the co-payment rate for siblings



Early Learning Coalition of Southwest Florida Policy

220.2 Child Care Resource and Referral Services

Revision Date: 10/2014
Board Approval Date: 10-8-2014
Effective Date: 10-8-2014

POLICY:

The Coalition shall comply with the requirements of its current Grant Agreement with OEL and concurrent with the CCR&R Program Requirements and as amended.

The Coalition's responsibilities shall include: providing information to the public on existing public and private child care and early childhood education programs and services; including child care services by public and private employers; family day care; Head Start; prekindergarten early intervention programs; special education programs for prekindergarten handicapped children; services for children with developmental disabilities; full-time and part-time programs; before-school and after-school programs; vacation care programs; parent education; the WAGES Program; and related community family support services.

Citation History: 6M9.300

Associated Documents: OEL's CCR&R Program Requirements

Reference #: OEL-EL 220

Replaces: ELCSW-220.2



Early Learning Coalition of Southwest Florida

Policy: 220.2 Child Care Resource and Referral Services

Revision Date: October 10, 2017

Board Approval Date:

Effective Date:

PROCEDURE:

A) Identify existing public and private child care and early childhood education services, including child care services by public and private employers, and the development of a resource file of those services through the single statewide information system developed by the office under s. [1002.82\(2\)\(n\)](#). These services may include family day care, public and private child care programs, the Voluntary Prekindergarten Education Program, Head Start, the school readiness program, special education programs for prekindergarten children with disabilities, services for children with developmental disabilities, full-time and part-time programs, before-school and after-school programs, vacation care programs, parent education, the temporary cash assistance program, and related family support services.

The resource file shall include, but not be limited to:

1. Type of program.
2. Hours of service.
3. Ages of children served.
4. Number of children served.
5. Program information.
6. Fees and eligibility for services.
7. Availability of transportation.

(b) Respond to parental need for information and that is provided with full recognition of the confidentiality rights of parents. Make referrals only to legally operating child care facilities. Referrals may not be made to a child care facility that is operating illegally.

(c) Maintain ongoing documentation of requests for service tabulated through the internal referral process through the single statewide information system.

Maintain the following documentation of requests for service:

1. Number of calls and contacts to the child care resource information and referral network component by type of service requested.
2. Ages of children for whom service was requested.
3. Time category of child care requests for each child.
4. Special time category, such as nights, weekends, and swing shift.
5. Reason that the child care is needed.
6. Name of the employer and primary focus of the business for an employer-based child care program.

(d) Provision of technical assistance to existing and potential providers of child care services.

This assistance may include:

1. Information on initiating new child care services, zoning, and program and budget development and assistance in finding such information from other sources.
 2. Information and resources which help existing child care services providers to maximize their ability to serve children and parents in their community.
 3. Information and incentives that may help existing or planned child care services offered by public or private employers seeking to maximize their ability to serve the children of their working parent employees in their community, through contractual or other funding arrangements with businesses.
- (e) Assistance to families and employers in applying for various sources of subsidy, including, but not limited to, the Voluntary Prekindergarten Education Program, the school readiness program, Head Start, Project Independence, private scholarships, and the federal child and dependent care tax credit.
- (f) Assistance to families to negotiate discounts or other special arrangements with child care providers.
- (g) Assistance to families in identifying summer recreation camp and summer day camp programs to help families make informed choices. Contingent upon specific appropriation, a checklist of important health and safety qualities that parents can use to choose their summer camp programs shall be developed and distributed in a manner that will reach parents interested in such programs for their children.
- (h) Assistance to families for accessing local community resources.

(4) A child care facility licensed under s. [402.305](#) and licensed and registered family day care homes must provide the statewide child care and resource and referral network with the following information annually:

- (a) Type of program.
- (b) Hours of service.
- (c) Ages of children served.
- (d) Fees and eligibility for services.

Citation: [s. 1002.87, F.S.](#) ; [s. 1002.85, F.S.](#) ; [s. 1002.84, F.S.](#) ; [s. 1002.81, F.S.](#) and [Chapter 6M-4, FAC.](#)

Associated Documents:

Reference #:

Replaces:

III B Infant/Toddler

ELC participates as a partner with Lee County Schools for an Early Head Start - Child Care Partnership grant, received in May 2015. Five child care facilities in Lee County were chosen to be part of the project. 40% of the children in the EHS-CCP project are funded by school readiness on an ongoing basis through May 2020.

A parent training, Words, Words, Words is offered through the auspices of various social service agencies and family health providers. This training teaches parents (and expectant parents) the importance of talking with their infants and small children, how to read to them effectively, and how to increase their exposure to language.

Trainings specifically for infant and toddler providers are offered on a regular basis which may include: Breastfeeding Friendly Child Care, Car Seat Safety, Safe Sleep/SIDS, Effective Interactions with Infants and Toddlers, Biting in Young Children, Healthy Beverages and Infant Feeding and Child Abuse.

Early Childhood Specialists became certified observers in Infant CLASS and Toddler CLASS, to offer assessments and follow up coaching with Infant and toddler teachers. Toddler CLASS and Infant CLASS are offered to providers to learn about the tools by Early Childhood Specialists certified as CLASS trainers. Early Childhood Specialists are also being certified to offer Toddler MMCI.

Islands of Excellence, an independent studies program in which infant toddler teachers read a series of books, list 10 take aways, plan an activity and submit it for evaluation by an early childhood expert. Once the project is evaluated, the participant receives the evaluation and goes on to the next book. This method provides quality professional development opportunities for those who have difficulty attending face to face trainings and prefer not to do trainings on-line as well as the opportunity to earn CEUs needed to maintain their CDA credentials.

Due to increased infant/toddler referrals and ASQ identification of possible delays, the Inclusion Coordinator provides additional follow-up to providers, teachers and parents. Additional activities specific to the area of concern for this developmental age group was provided while the referral was in progress.

Materials and training on those materials is offered as the budget allows.

III C Inclusive Early Learning Programs

The Inclusion Coordinator promotes inclusive care throughout the year by providing on-site classroom and child visits, telephone conferencing and by providing information and referrals to providers, parents and the community. The services include: 1) Provision of basic information on ADA and community resources for all providers, including non-contracted community child care providers; 2) Inclusion activities include support recommendations in classroom routine, scheduling, classroom management, appropriate supportive activities, and modifications to include all children. Conferencing with parents, directors and teachers to develop support plans for specific children or the overall classroom also occur; 3) Partners and coordinates with School District ESE staff to help support identified children in child care centers to support IEP's goals; 4) The Warm Line contact (Inclusion Coordinator) is available to answer questions and provide supports in regard to including children with disabilities or special health care needs in their programs, assistance/resources for contracted providers, community providers, parents and agencies.

The Inclusion Coordinator participates in the TATS Regional Steering Committee. This group works toward developing supportive strategies to help children and families struggling with delays, disabilities and dual language complications. Community agency representatives meet to promote awareness of inclusion in our community. The group identifies gaps in services and strategies to support children with delays not qualifying for services. Participated in BPIECE pilot project assisting 5 providers in the instruction and application process. Provided ongoing support for teachers in the classrooms.

Due to increased infant/toddler referrals and ASQ identification of possible delays, the Inclusion Coordinator provides additional follow-up to providers, teachers and parents. Additional activities specific to the area of concern for this developmental age group was provided while the referral was in progress.

Trainings offered by Inclusion Coordinator (offered numerous times/various locations): 1) Providing a Supportive Environment; 2) How Trauma Effects Child Development; 3) Managing Children's challenging Behaviors; 4) Providing a supportive Environment for Challenging Behaviors.

The intervention team examines all ASQ screenings to determine the need for individual learning plans and/or observation by the inclusion coordinator and referral to outside agencies. Parents are sent activities to do at home with their child that complement the learning plan.

D. Quality Performance Report

a. Does the coalition train programs on the Early Learning Guidelines (ELG) adopted by OEL?

Yes No

If yes, does the coalition track how many programs were trained, by provider type, on the ELGs?

Yes No

If yes, does the coalition track the number of children served in ELG trained programs?

Yes No

b. Does the coalition provide targeted technical assistance to programs such as coaching, mentoring, or consulting during the fiscal year? Note: targeted technical assistance is (coaching, mentoring and consultation) designed to address a particular domain/area of quality.

Yes No

If yes, what type of targeted technical assistance is provided?

Health and safety

Infant and toddler care

School-age care

Inclusion

Teaching dual language learners

Understanding developmental screenings and/or observational assessment tools for program improvement purposes

Mental health

Business management practices

Other Describe:

Challenging Behaviors, room arrangement, lesson planning, curriculum, discipline, literacy, Environment Rating System, Classroom Assessment System.

c. Does the coalition provide financial supports to early learning providers? Financial supports must be intended to reward, improve, or sustain quality. They can include grants, cash, reimbursements, gift cards, or purchases made to benefit a program. One-time grants, awards, or bonuses include any kind of financial support that a program can receive only once. On-going or periodic quality stipends include any kind of financial support intended to reward, improve, or sustain quality that a program can receive more than once.

Does the coalition provide one-time grants, awards or bonuses to **Child Care Centers**?

Yes No

If yes, describe:

Does the coalition provide one-time grants, awards or bonuses to **Family Child Care Homes**?

Yes No

If yes, describe:

Does the coalition provide on-going or periodic quality stipends to **Child Care Centers**?

Yes No

If yes, describe:

If they are part of the Southwest Florida Stars program (QRIS), they may receive some level of material support at the end of the year, dependent upon their star level and the Coalition budget.

Does the coalition provide on-going or periodic quality stipends to **Family Child Care Homes**?

- Yes No

If yes, describe:

If they are part of the Southwest Florida Stars Program (QRIS), they may receive some level of material support at the end of the year, dependent upon their star level and the Coalition budget.

Please check what types of financial supports are provided to child care teachers/providers?

- Scholarships
 Reimbursement for Training Expenses
 Loans
 Wage supplements
 N/A
 Other Describe:

Scholarships are offered in support of CDAs, Director Credentials, AS/AA degrees, and conferences as funding allows. The amount of support is dependent on participation in the Southwest Florida Stars program (QRIS) and the star rating level received, as well as the Coalition budget. See Policy 420.2 Professional Development Scholarships.

d. Does the coalition have a voluntary Quality Rating Improvement System (QRIS) in place for the coalition’s service area?

- Yes No

If yes, please provide how many levels and a brief description of each level:

QRIS Level	Level Description
One Star This is our protocol for 2017-2018 Southwest Florida Stars	<ul style="list-style-type: none"> • Learning Environment & Classroom Interactions: Participant has to have Infant Class score of 3.5- 3.99 on Responsive Caregiving; Toddler Class score of 4.0 – 4.59 on Emotional and Behavioral Support, and 2.0- 2.49 on Engaged Support for Learning; Pre-K scores of 4.0 – 4.59 on Emotional Support, 3.5 – 3.99 on Classroom organization and 1.5 – 1.99 on Instructional Support • Health and Safety: Meet DCF licensing standards; Meet ELC requirements for Vision and Hearing Screening. Ratio same as DCF licensing. • Screening, Assessment and Curriculum: Have current weekly lesson plans posted; Complete ASQ

	<p>screenings and individualized learning plans (ILPs) on time for all SR children; Request a copy of child’s IEP to develop classroom supports; complete assessment aligned with OEL approved curricula on time for SR funded children.</p> <ul style="list-style-type: none"> • Professional Development: Director holds current Florida Director’s Credential; All teaching staff meet DCF training and professional development requirements; 100% of lead teachers complete 40 hr. DCF training and 5 hr. Early Literacy course in allowable time frame; 100% of assistant teachers complete 40 hr. DCF training and 5 hr. Early Literacy course in allowable time frame. • Family and Community Relationships: Have a comprehensive parent handbook; provide families with information regarding public, social and community services. • Professional Responsibility: Have a comprehensive staff handbook, including written job descriptions, staff orientation procedures, and disaster preparedness; facilitate staff meeting every other month. 																					
Two Stars	<ul style="list-style-type: none"> • Learning Environment & Classroom Interactions: Participant has to have Infant Class score of 4.0- 4.49 on Responsive Caregiving; Toddler Class score of 4.5 – 4.99 on Emotional and Behavioral Support, and 2.5- 2.99 on Engaged Support for Learning; Pre-K scores of 4.5 – 4.99 on Emotional Support, 4.0 – 4.49 on Classroom organization and 2.0 – 2.49 on Instructional Support • Health and Safety: Meets Level 1 plus complete daily health checks on children; <table data-bbox="704 1402 997 1680"> <thead> <tr> <th>Age</th> <th>Ratio</th> <th>Group Size</th> </tr> </thead> <tbody> <tr> <td>Inf</td> <td>1:4</td> <td>12</td> </tr> <tr> <td>One</td> <td>1:6</td> <td>12</td> </tr> <tr> <td>Two</td> <td>1:9</td> <td>18</td> </tr> <tr> <td>Three</td> <td>1:13</td> <td>26</td> </tr> <tr> <td>4/5</td> <td>1:16</td> <td>32</td> </tr> <tr> <td>SCH</td> <td>1:25</td> <td>40</td> </tr> </tbody> </table> • Screening, Assessment and Curriculum: Meets level one criteria plus: Complete ASQ screenings and individualized learning plans (ILPs) and assessments on approved curriculum on time for all SR children; director complete training for assessment aligned 	Age	Ratio	Group Size	Inf	1:4	12	One	1:6	12	Two	1:9	18	Three	1:13	26	4/5	1:16	32	SCH	1:25	40
Age	Ratio	Group Size																				
Inf	1:4	12																				
One	1:6	12																				
Two	1:9	18																				
Three	1:13	26																				
4/5	1:16	32																				
SCH	1:25	40																				

	<p>with OEL approved Curriculum; Implement classroom documentation system (TSG, portfolios, etc)</p> <ul style="list-style-type: none"> • Professional Development: Meets level 1 plus; Director holds AS/AA degree or 63 hrs. college coursework or enrolled in AS/AA degree program; 12 hours in service for all staff annually; 50% of Leads complete FL Early Learning and Developmental Standards training for applicable age group; 50% of leads have CDA staff credential or are enrolled in coursework for CDA; 100% of assistant teachers have HS diploma from an accredited high school or GED. • Family and Community Relationships: Meet Level 1 criteria plus; Host 1 family event per year; provide quarterly newsletters to parents; send daily notes home for children under 3 yrs. of age. • Professional Responsibility: Meet level 1 plus facilitate staff meetings every month; establish director meetings with staff to create a professional development plan; join a director networking group or professional organization. 																					
Three Stars	<ul style="list-style-type: none"> • Learning Environment & Classroom Interactions: Participant has to have Infant Class score of 4.5- 4.99 on Responsive Caregiving; Toddler Class score of 5.0 – 5.49 on Emotional and Behavioral Support, and 3.0- 3.49 on Engaged Support for Learning; Pre-K scores of 5.0 – 5.49 on Emotional Support, 4.5 – 4.99 on Classroom organization and 2.5 – 2.99 on Instructional Support • Health and Safety: Meets Level 1 plus complete daily health checks on children; <table border="0" data-bbox="703 1291 998 1570"> <thead> <tr> <th>Age</th> <th>Ratio</th> <th>Group Size</th> </tr> </thead> <tbody> <tr> <td>Inf</td> <td>1:4</td> <td>12</td> </tr> <tr> <td>One</td> <td>1:6</td> <td>12</td> </tr> <tr> <td>Two</td> <td>1:8</td> <td>16</td> </tr> <tr> <td>Three</td> <td>1:12</td> <td>24</td> </tr> <tr> <td>4/5</td> <td>1:13</td> <td>26</td> </tr> <tr> <td>SCH</td> <td>1:25</td> <td>40</td> </tr> </tbody> </table> • Screening, Assessment and Curriculum: Meets level two criteria plus: Lesson plans posted aligned with Florida Early Learning and Developmental Standards or Curriculum objectives; Lead teachers complete training for assessment aligned with OEL approved Curriculum; document director/parent or teacher/parent discussions together once it is received and in 8 weeks, following the rescreen, if 	Age	Ratio	Group Size	Inf	1:4	12	One	1:6	12	Two	1:8	16	Three	1:12	24	4/5	1:13	26	SCH	1:25	40
Age	Ratio	Group Size																				
Inf	1:4	12																				
One	1:6	12																				
Two	1:8	16																				
Three	1:12	24																				
4/5	1:13	26																				
SCH	1:25	40																				

	<p>applicable; outline plan for referring families to Early Intervention services as needed.</p> <ul style="list-style-type: none"> • Professional Development: Meets level 2 plus; Director holds AS/AA degree or 63 hrs. college coursework or enrolled in AS/AA degree program with 12 credits in Early Childhood Education, 3 of which must focus on special needs; 16 hours in service for all staff annually; 75% of Leads complete FL Early Learning and Developmental Standards training for applicable age group; 75% of leads have CDA staff credential or are enrolled in coursework for CDA; 25% of assistant teachers have DCF Staff Credential with a CDA or higher education or are enrolled in coursework for a CDA. • Family and Community Relationships: Meet Level 2 criteria plus; Host 2 family events per year; Meet for 1 parent/teacher conference per year • Professional Responsibility: Meet level 2 plus; Join and actively participate in a director networking group or professional organization; facilitate annual team building event, complete written performance evaluations for a minimum of 50% of staff, annually 																					
Four Stars	<ul style="list-style-type: none"> • Learning Environment & Classroom Interactions: Participant has to have Infant Class score of 5.0- 5.49 on Responsive Caregiving; Toddler Class score of 5.5 – 5.99 on Emotional and Behavioral Support, and 3.5- 3.99 on Engaged Support for Learning; Pre-K scores of 5.5 – 5.99 on Emotional Support, 5.0 – 5.49 on Classroom organization and 3.0 – 3.499 on Instructional Support • Health and Safety: Meets Level 1 plus complete daily health checks on children; <table data-bbox="704 1402 997 1680"> <thead> <tr> <th>Age</th> <th>Ratio</th> <th>Group Size</th> </tr> </thead> <tbody> <tr> <td>Inf</td> <td>1:3-4</td> <td>6-8</td> </tr> <tr> <td>One</td> <td>1:5</td> <td>10</td> </tr> <tr> <td>Two</td> <td>1:7</td> <td>14</td> </tr> <tr> <td>Three</td> <td>1:10</td> <td>20</td> </tr> <tr> <td>4/5</td> <td>1:11</td> <td>22</td> </tr> <tr> <td>SCH</td> <td>1:20</td> <td>30</td> </tr> </tbody> </table> • Screening, Assessment and Curriculum: Meets level 3 criteria plus: Weekly individualized lesson plans based on assessment aligned with OEL approved curriculum; Complete assessment aligned with OEL approved curriculum on time for all children; 	Age	Ratio	Group Size	Inf	1:3-4	6-8	One	1:5	10	Two	1:7	14	Three	1:10	20	4/5	1:11	22	SCH	1:20	30
Age	Ratio	Group Size																				
Inf	1:3-4	6-8																				
One	1:5	10																				
Two	1:7	14																				
Three	1:10	20																				
4/5	1:11	22																				
SCH	1:20	30																				

	<p>Demonstrate implementation of a social/emotional curriculum.</p> <ul style="list-style-type: none"> Professional Development: Meets level 3 criteria plus; Director enrolled in course work for a Bachelor's degree with 18 credits in Early Childhood Education, 3 of which must focus on working with children with special needs; 20 hours in service for all staff annually; 50% of assistant teachers complete FL Early Learning and Developmental Standards training that corresponds with their classroom group, update as needed. 25% of lead teachers have an AS degree in Early Childhood Education or 63 hours of college coursework with 12 credits in Early Childhood Education, 3 of which must focus on working with children with special needs; 50% of Assistant Teachers have a DCF staff credential with a child development Associate (CDA) or higher education, or enrolled in coursework for a CDA. Family and Community Relationships: Meet Level 3 criteria plus; Provide monthly newsletters to parents; Meet for 2 parent/teacher conference per year to correspond with results from assessment tool aligned with OEL approved Curriculum; implement formal volunteer program Professional Responsibility: Meet level 3 plus: Complete written staff performance evaluations which include reference to classroom observation, for a minimum of 75% of staff, annually; community collaboration with local colleges to create a formal internship program. 															
Five Stars	<ul style="list-style-type: none"> Learning Environment & Classroom Interactions: Participant has to have Infant Class score of at least 5.5 on Responsive Caregiving; Toddler Class score of at least 6.0 on Emotional and Behavioral Support, and 4.0 on Engaged Support for Learning; Pre-K scores of at least 6.0 on Emotional Support, 5.5 on Classroom Organization and 3.5 on Instructional Support Health and Safety: Meets Level 1 plus complete daily health checks on children; <table data-bbox="704 1696 997 1892"> <thead> <tr> <th>Age</th> <th>Ratio</th> <th>Group Size</th> </tr> </thead> <tbody> <tr> <td>Inf</td> <td>1:3-4</td> <td>6-8</td> </tr> <tr> <td>One</td> <td>1:5</td> <td>10</td> </tr> <tr> <td>Two</td> <td>1:6</td> <td>12</td> </tr> <tr> <td>Three</td> <td>1:9</td> <td>18</td> </tr> </tbody> </table> 	Age	Ratio	Group Size	Inf	1:3-4	6-8	One	1:5	10	Two	1:6	12	Three	1:9	18
Age	Ratio	Group Size														
Inf	1:3-4	6-8														
One	1:5	10														
Two	1:6	12														
Three	1:9	18														

	<p>4/5 1:10 20 SCH 1:15 30</p> <ul style="list-style-type: none"> • Screening, Assessment and Curriculum: Meets level 4 criteria plus: Serve as a demonstration center for assessment aligned with OEL approved curriculum. • Professional Development: Meets level 4 criteria plus; Director holds a Bachelor’s degree with 18 credits in Early Childhood Education, 3 of which must focus on working with children with special needs; 24 hours in service for all staff annually; 75% of lead and 50% of assistant teachers complete FL Early Learning and Developmental Standards training that corresponds with their classroom group, update as needed. 50% of lead teachers have an AS degree in Early Childhood Education or 63 hours of college coursework with 12 credits in Early Childhood Education, 3 of which must focus on working with children with special needs; 50% of Assistant Teachers have a DCF staff credential with a child development Associate (CDA) or higher education, or enrolled in coursework for a CDA. • Family and Community Relationships: Meet Level 4 criteria plus; Provide monthly newsletters to parents; Meet for 2 parent/teacher conference per year to correspond with results from assessment tool aligned with OEL approved Curriculum; implement formal volunteer program • Professional Responsibility: Meet level 4 plus: Complete written staff performance evaluations which include reference to classroom observation, for a minimum of 75% of staff, annually; community collaboration with local colleges to create a formal internship program.
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Please attach any supporting documentation as Attachment III.D.



Early Learning Coalition of Southwest Florida Policy

420.2 Professional Development Scholarships

Revision Date: May 27, 2015
Board Approval Date: June 17, 2015
Effective Date: July 1, 2015

POLICY:

Each fiscal year, funding may be allocated to support professional development scholarships to Early Learning Providers, dependent upon funding.

Citation History: 45CFR98, Code of Federal Regulations; Chapter 402.310-319, Florida Statutes

Associated Documents: Professional Development Scholarship Application (Form 1022); Professional Development Scholarship Approval Procedure

Reference #: OEL-SR-420

Replaces: ELCSWF-SR0025.13

IV.B. Prior Year Revenues and Expenditures

Not due until October 1st.

**SUBRECIPIENT MONITORING SCHEDULE/PLAN
Monitoring Plan/Schedule FY 2017-2018**

Subrecipient - Redlands Christian Migrant Association, Inc (RCMA)

A. Onsite Monitoring Schedule

	Programs	Monitoring Frequency	Monitoring Due Date	Status/Comments
1	VPK Enrollment/Eligibility	Annually	TBD	
2	VPK Payment Validation	Annually	TBD	
3	VPK Provider services	Monthly, January through March, 2018	JAN -FEB 2018	
4	Fiscal review	Annually	TBD	

B. Ongoing Monitoring Schedule FY 2016-2017

	Report Title	Reporting Frequency	Report Due Date	Status/Comments
1	Invoice	Monthly	By the 15 th of the month following the month of service	Ongoing
2	VPK Service Report	Monthly	By the 15 th of the month following the month of service	Ongoing
3	VPK Provider services_ Desk review	Quarterly	By the 15 th of the month following the end of the quarter	Ongoing
4	Annual VPK Service Report	Annually	8/31/2018	

C. Fiscal review that includes:

Analysis of subrecipient's single audits; Analysis of subrecipient's cost allocation plans and a tracking process

To summarize for management the monitoring results and resolution of any questioned costs.

To issue a management decision on audit findings within six months after receipt of the subrecipient's audit report and a requirement to verify that the subrecipient takes appropriate, timely corrective action.

The monitoring includes a review of RCMA's policy and procedures to ensure they align with current VPK Rules, statutes and OEL Guidance.

Monitoring Tools reference as follows:

SUBRECIPIENT MONITORING SCHEDULE/PLAN

OEL current VPK eligibility and payment validation including VPK provider file review monitoring tools; the VPK Standard Eligibility Review Program Guide; and OEL Fiscal Monitoring Tool are the tools used for the RCMA review. 100% of Providers are monitored within a two year period. At least 50% of providers are monitored each year.

The monitoring tools are used to track the administrative, programmatic and eligibility requirements in the provider's contract. Corrective actions from the previous Coalition issued report is reviewed for implementation. Monitoring reports are generated based on the findings and submitted to the provider including recommendations, requiring response and corrective action where applicable.

**Minimum monitoring sample based on data as of the end of June 2017 (2016-17
data from OEL FACT book)**

RCMA	Amt served as of 05/2017	OEL minimum Sample
VPK PROVIDERS	46	37
VPK CHILDREN:	877	119



Early Learning Coalition of Southwest Florida Policy

220.10 School Readiness and VPK Providers Compliance Policy

Revision Date: May 27, 2015
Board Approval Date: June 17, 2015
Effective Date: July 1, 2015

POLICY:

The Coalition will ensure that all Providers under contract with the Early Learning Coalition will comply with applicable Florida laws, rules, and regulations and the Provider Agreements/Contracts (SR and/or VPK).

Citation History: 45CFR98, Chapters 402.301 – 402.319, and Section 1002.55-79, F.S. 65C-22 and 65C-20 Florida Administrative Code

Associated Documents: 6M-4.610 Statewide Provider Contract for the School Readiness; 6M-8.301 Standard Statewide Provider Contract for the VPK Program

Reference #: OEL-EL-220

Replaces: ELCSW-EL0008-11



Appeals and Hearings Procedure

EII.QS.C.6.4.2

For SR contracts signed after 1/1/17 and VPK and SR 2017-18

Effective Date: January 1, 2017

Early Learning Coalitions are responsible for the local implementation of early learning programs funded with state and federal funds, such as the School Readiness Program and the Voluntary Prekindergarten Program. Providers of such early learning programs may request a review of determinations made by the Early Learning Coalition of Southwest Florida in accordance with the due process procedures described below.

- A. **Request for Review Hearing.** If a provider disputes any action taken by the Coalition regarding the terms of the Statewide School Readiness Provider Contract or the Statewide Voluntary Prekindergarten Contract, the provider may request a review hearing in writing by sending it to the contact person listed in the Coalition's action. A review hearing is a "meeting" for the purposes of the Sunshine law which is subject to public notice. During a review hearing, the provider will have a reasonable opportunity to address Coalition staff persons regarding the Coalition's action and present supporting evidence before a Review Hearing Committee. Provider may have an attorney present at the review hearing to represent or advise the provider. The request for review hearing must state:
 - The name and contact information of an individual authorized to provide information and binding responses on behalf of provider;
 - The specific action by the Coalition that the provider disputes;
 - The specific reasons for the provider's belief;
 - Whether the provider will be represented by an attorney or another individual during the review hearing.
- B. **Request Time.** The provider's request for a review hearing must be submitted in writing to the Coalition within five (5) business days of receipt of notice of the determination which the provider believes to be incorrect.
- C. **Supporting Documentation.** The provider must send copies of any written documentation supporting the claims of the provider. Examples of relevant documentation may include, but are not limited to:
 - Attendance documentation
 - Notarized attestations from parents
 - Documentation from licensing or accrediting bodies
 - Documents demonstrating dates of information submission
 - Proposed corrective action plan

- D. **Implementation of Review.** If the Coalition receives a request for review hearing from the provider, the Coalition must address the request by taking the following steps:
1. **Assignment of Review Hearing Committee.** Within three (3) business days of receipt of a request for review hearing, the Coalition must assign a Review Hearing Committee to complete the review. The Review Hearing Committee must be composed of at least three but no more than five members of the Coalition Board. The Chair of the Coalition shall appoint the Review Hearing Committee and shall name the Chair of the Committee. At least one of the members must be a mandatory member as set forth in section 1002.83 (4) and at least one other member shall be one of the provider representative members.. If no provider representative is available to participate, a waiver is possible if documented in the deliberations of the review hearing committee.
 2. **Response to Request for Review Hearing.** Within five (5) business days of receipt of the request for review hearing, the Coalition must respond to the provider in writing, return receipt requested. The notice must include at least three (3) proposed dates and times for the review hearing which must be within forty-five (45) days of the date of receipt of the request for review hearing. The notice must also state that the review hearing may be conducted in person at a location designated by the Coalition or via any method of telecommunications, as long as the public is given reasonable access to observe and, when appropriate, participate. Finally, the notice must state whether or not all of the Coalition staff persons whom the provider wishes to have present during the hearing will be made available. If any individual who the provider requested to have present is not available, the Coalition must make available an individual who is qualified to address the subjects the provider wished the individual to address.
 3. **Date and Location Selection.** Within five (5) business days of receipt of the response to a request for review hearing, the provider must inform the Coalition of the date and time which it selects for the review hearing and whether the provider will attend the meeting in person or via a method of telecommunication. Within five (5) business days of receipt of the response to a request for review hearing, if the provider is unable to attend any of the proposed dates and times for the review hearing, the provider must submit written notice which states the specific reasons that appellant is unable to attend and must contact the Coalition to select a mutually agreed upon date for the review hearing. If the provider does not inform the Coalition of the date and time within the required time period, then the process is considered complete and the request is denied.
 4. **Conducting the Review Hearing.** The Review Hearing Committee shall assess the claim(s) the provider made in its request for review by examining all information and documentation submitted by the provider. The provider must be given a reasonable opportunity to question Coalition staff-persons regarding the determinations of the Coalition and to present evidence before the Review Hearing Committee. The Coalition will also be provided a reasonable opportunity to submit evidence to rebut any claims made by the provider.
 5. **Review Hearing Committee Decision Conclusion.** Following completion of the presentation by the provider and the Coalition, the Review Hearing

Committee will vote regarding each of the provider's claims. The decision of the Review Hearing Committee is final. In its' deliberations, the Review Hearing Committee must determine:

- a. If the determination made by the Coalition was correct, in whole or in part, or incorrect.
- b. If no part of the determination made by the Coalition was correct, the notice must state provider is not required to take further action.
- c.. If any part of the determination made by the Coalition is correct, the committee must identify the portion(s) determined to be correct, and as applicable, to decide:
 - 1) If corrective action is necessary, then the provider must take corrective action in regard to the part(s) which the Review Hearing Committee determines to be corrected; and the revised deadlines for completion of the corrective action(s);
 - 2) If the provider's School Readiness [VPK] or eligibility to offer the School Readiness [VPK] Program will be terminated, the date of termination.

6. Notice of Review Hearing Conclusion The Chair of the Review Hearing Committee shall ensure a written notice of the review hearing conclusion is prepared. The written notice must state the outcome of the Review Hearing Committee's vote regarding each of the provider's claims. In addition, the notice must specifically state the reasons supporting the Review Hearing Committee's conclusions. The dates for either corrective action to be completed, or termination of eligibility to offer the School Readiness [Voluntary Prekindergarten] Program shall be included in the notice. The chair of the Review Hearing Committee shall approve the notice and ensure it is made public within ten (10) business days of the conclusion of the Review Hearing.

- a. The CEO will notify the provider in writing of the decision of the Review Hearing Committee.
- b. A report of the Review Hearing Committee and Committee decisions will be made to the Coalition Board at the next scheduled Coalition Board meeting.

Citations

OEL Grant Agreement Exhibit II Scope of Work

Rule 6M-4.630, F.A.C.

Section 1002.83(4)



Early Learning Coalition of Southwest Florida Policy

220.4 Complaint and Dispute Resolution

Revision Date: 5/6/2016
Board Approval Date: 5/25/2016
Effective Date: 5/25/2016

POLICY:

The Coalition shall record and initiate a review of all complaints received from parents, providers, other professional staff, and the public.

Complaints of child abuse and neglect or complaints which pose an immediate health and/or safety risk will be reported within the hour to the Florida Abuse Hotline 1-800-96 Abuse and the licensing authority by telephone or fax.

Complaints other than those specifying abuse, neglect, or licensing violations will be referred to the appropriate Coalition staff, designee, or outside agency for technical assistance, dependent on the nature of the complaint. Complaints shall be addressed in accordance with the Coalition's Procedures.

A record of substantiated complaints other than those specifying abuse, neglect, or licensing violations will be maintained by the Coalition and shall be made available to the public on request in conformance with the federal regulation 45 CFR 98.32 and the Coalition's confidential requirements in releasing client or provider information.

Citation History: 1002.51-79, F.S.; 1002.81-97, F.S.; 45 CFR 98.32; 1002.91 F.S.

Associated Documents: ELCSWFL Coalition SR Plan; Coalition Policies; 220.11 "Reporting Abuse and Neglect"; 220.7 "Intentional Program Violations"; 220.6."Coalition Appeals and Hearings", Anti-Fraud Plan.