



Enrollment and Quality Expenditures for Early Learning Programs

OF INTEREST TO

The Office of Early Learning (OEL, the Office) and Early Learning Coalitions (ELCs) and other direct subrecipients of OEL implementing federal and state early learning programs, such as the School Readiness Program and the Voluntary Prekindergarten Education (VPK) Program.

SUMMARY

This document provides guidance on appropriate charging for activities. The areas discussed within this document may serve as a resource to identify areas where items of costs from similar functions/activities may appropriately be shared or directly charged as an allowable expenditure to specific Other Cost Accumulators (OCA).

BACKGROUND

The School Readiness (SR) and Voluntary Prekindergarten (VPK) Education programs are administered locally by the Early Learning Coalitions and other sub-recipients. While the programs have similar functions/activities, they also have different program purposes and are supported by separate funding streams; therefore, it is critical that costs for each program be appropriately charged based on the benefit received.

To help ensure the costs associated with a particular program are expended in the benefit of that program, each Early Learning Coalition is required to submit a cost allocation plan to OEL that demonstrates how an early learning coalition charges each program for direct costs and also how it determines and allocates shared costs to all programs, both state and federally funded programs.

2 CFR § 200.405, Cost Principles, provides, in part, the requirements for allocable costs, as follows:

Subpart E Cost Principles, § 200.405 Allocable Costs.

- (a) A cost is allocable to a particular Federal award or cost objective if the goods or services involved are chargeable or assignable to that Federal award or cost objective in accordance with the relative benefits received. This standard is met if the cost:
 - (1) Is incurred specifically for the Federal award;
 - (2) Benefits both the Federal award and other work of the non-Federal entity and can be distributed in proportions that may be approximated using reasonable methods; and
 - (3) Is necessary to the overall operation of the non-Federal entity and is assignable in part to the Federal award in accordance with the principles in this subpart.

STATE GUIDANCE – ENROLLMENT IN EARLY LEARNING PROGRAMS

Individual Enrollments

Voluntary Prekindergarten (VPK) Education Program

VPENR – VPK enrollment includes enrolling and reenrolling children, maintaining and distributing provider profiles, registering providers, and determining eligibility of providers. Coalitions will be required to maintain general ledger accounts documenting such expenditures. Subject to 4.0 percent cap for VPK administrative costs - see VPADM [From OCA Working Definition].

- Charged 100 percent to VPK

School Readiness Program

97BDE -Expenditures related to the process of determining the eligibility of a particular person for child care services. This also includes expenditures related to developing and operating a certificate program. Expenditures related to the placement of the child should be captured under 97BBD. Reimbursement for these categories (97BBD, 97BDE, 97LCD, 97LCE) is capped at 19 percent of total expenditures (less CCEP expenditures) less reimbursement for administrative costs (see 97BBA, 97LCA, and 97FIR). [From OCA Working Definition]

- Charged 100 percent to SR

Note: Expenditures related to a child being determined not eligible for School Readiness is allowable for this OCA.

Enrollment Round-Ups

Coalitions may choose to conduct annual or periodic enrollment round-ups for VPK and SR. Key points to follow when planning and coordinating these round-ups –

- When conducting VPK-only round-ups and interviews, please ensure VPK expenditures are not charged to SR. Examples of allowable costs would be advertising, supplies, data entry, time spent on VPK forms, and the overall costs of the event.
- In the conducting VPK-only round-up activity, the following costs may be charged to SR –
 - costs associated with the time spent and materials provided related to resource and referral including but not limited to materials relating to quality and the selection of quality care, and
 - amount of time spent with the family during which such information is shared.
 - All other costs must be charged to VPK.
- The ELC may conduct round-ups that include enrollment and information for both VPK and SR programs. Round-up activities encompassing both programs could more appropriately be referred to as Early Learning Round-Ups, and the cost of such events should properly be shared between the programs, based on the benefit received by each program. Such costs, which should be shared, include advertising, supplies, data entry, staff time, and other costs necessary to plan and conduct the event.

The ELC should ensure that any allocation of cost for the VPK Round-Up and Early Learning Round- Up is consistent with federal requirements and direct and shared costs are properly and accurately recorded within each program area.

Quality Expenditures for Early Learning Programs

The definitions of quality OCA's and the activities that are allowable under each are included in the Program Guidance 250.01 Other Cost Accumulators (OCAs) Working Definitions. Generally, quality activities funded by the School Readiness Program may benefit all the children in the State of Florida and are not limited to the SR children, with the exception of SR Gold Seal Quality Care expenditures, which are specific to SR children in care at Gold Seal Providers.

Check 250.01 for additional information related to Quality OCA's

The ELC should ensure that any direct charge or allocation of costs to the Quality OCAs is consistent with federal requirements that the programs receiving the costs are receiving the commensurate benefit.

AUTHORITY

2 CFR Part 200, subparts A, B, C, D, E, and F.

HISTORY

This fiscal guidance replaces Accountability Program Integrity Technical Assistance Paper # 2011-01 adopted by the Office of Early Learning on February 17, 2011. *Revised* – May 1, 2014. Reissued November 26, 2014. Revised June 2016; effective July 1, 2016.

Please direct questions and comments to the Office of Early Learning at 850-717-8683 or oel.questions@oel.myflorida.com