




June 28, 2019

MEMORANDUM

TO: Early Learning Coalition Executive Directors, Early Learning Coalition Finance Directors, RCMA Executive Director

FROM: Rodney J. MacKinnon, Executive Director, Office of Early Learning 

SUBJECT: School Readiness (SR) Attendance and Reimbursement Processing - Update

The purpose of this document is to provide coalitions and RCMA with updated guidance related to SR attendance and reimbursement processing. With the provider attendance submission target deadline of July 3 fast approaching, we understand coalitions and providers have concerns regarding the consequences of not meeting the deadline and have decided to extend it to **Friday, August 2**.

Although the main purpose of this guidance is to address SR attendance and reimbursement processing, we would like to address concerns around VPK final payments. A data fix will be applied within the next week to correct about 600 VPK payment records across the state that had incorrect reimbursement rates in their end-of-class calculations. Once the data fix is applied, the VPK end-of-class reconciliation reports will be available to be generated for these payment records. These VPK end-of-class reconciliation reports as well as provider reimbursement reports may be used to obtain sign off from VPK providers to issue final VPK payments. The EFS-Mod project team will provide further guidance for impacted coalitions after the data fix has been applied.

OEL recommends coalitions and providers make every effort toward **submitting** all SR attendance, from service periods July 2018 through June 2019, by August 2, 2019. The consequence of not meeting this deadline is the possibility of further delay in payment reconciliation. OEL is aware that some coalitions will not meet the August 2 deadline because they are working on the attendance submission and payment reconciliation process using a parallel approach with the intent of having both processes complete no later than the submission of the final invoice for FY18-19, which is due 70 days after June 30. This approach is allowable provided the intent is still to meet the deadline for processing (payment reconciliation of) all outstanding attendance.

With this updated guidance, OEL still expects coalitions to process all outstanding attendance, from service periods July 2018 through June 2019, as soon as possible but no later than the submission of the final invoice for FY18-19, which is due 70 days after June 30.

Along with the submission of each monthly invoice, coalitions should include the final closed 5045s for any service periods that are included in the invoice. By the time of submission of the final closeout invoice, all final closed 5045s for FY18-19 must have been submitted to OEL. **Coalitions will continue to have the ability to make prior period adjustments as needed going forward.** Prior period adjustments resulting in a payment owed from OEL to the coalition may be requested for payment from the FY19-20 grant. Prior period adjustments resulting in a refund to OEL should be repaid to OEL via a check and deposit form in

accordance with OEL Program Guidance 240.01 – Cash Management. OEL will work with coalitions on a case-by-case basis if all outstanding attendance is unable to be processed within this timeframe.

OEL is aware that coalitions will differ in the amount of time needed to process each month’s reconciliation, and aware that each coalition has different communication routines with their providers. Accordingly, as requested by the majority of coalitions, in lieu of statewide instructions on a standardized process to providers directly from OEL, the coalition should provide instructions to School Readiness providers on attendance submission, including timelines that work best for your coalition.

Coalitions should instruct providers as to when the attendance certification requirements, included in the OEL-SR 20 and Rule 6M-4.500, F.A.C., will be required for online attendance submission. OEL recommends that coalitions start notifying providers of the upcoming requirement and designating staff to answer provider questions about the process. Coalitions should also continue to make monthly payments based on estimated attendance until the monthly attendance is up to date and payments have been reconciled.

Most likely, there will be issues that require coalition staff to work with providers and OEL to resolve on a case-by-case basis. OEL sincerely appreciates everyone’s patience and cooperation.

This document provides a summary of frequently asked questions and OEL responses concerning School Readiness attendance and reimbursement processing.

- 1. Is there a deadline for providers to submit all of their attendance, in EFS-Mod, dating back to July 2018?** OEL expects SR attendance, from service periods July 2018 through June 2019, to be submitted through EFS-Mod **no later than** August 2, 2019. Internal business processes should be considered in order to allow coalitions enough time to process the attendance within the timeframe outlined in **question two** of this document. OEL understands the challenge of meeting this requirement. Our team remains available to provide technical assistance to coalition staff as questions and challenges emerge.
- 2. Is there a deadline for coalitions to process all outstanding attendance, in EFS-Mod, dating back to July 2018?** OEL expects coalitions to process all outstanding attendance, from service periods July 2018 through June 2019, as soon as possible but no later than the submission of the final invoice for FY18-19, which is due 70 days after June 30.
- 3. Do providers have to submit outstanding attendance in chronological order?** Although there is no logic in EFS-Mod to prevent the submission of attendance out of chronological order, OEL recommends submitting in chronological order to avoid potential data continuity issues.
- 4. Do coalitions have to process outstanding attendance in chronological order?** Although there is no logic in EFS-Mod to prevent the processing of attendance out of chronological order, OEL recommends processing and making adjustments in chronological order to avoid potential data continuity issues.
- 5. How do I complete attendance for a provider that has gone out of business or no longer has a School Readiness contract?** OEL acknowledges that any collection effort can be frustrating and time consuming, however, there is guidance that helps facilitate the process. First, attempt to have the provider submit the attendance through EFS-Mod. If the provider is unwilling to submit their attendance through the statewide Provider Portal, use the **School Readiness Attendance Certification and Authorization form** included with this guidance. Coalitions should follow the collections process within OEL Program Guidance 240.03 – Collection of Delinquent Accounts to recover overpaid funds.
- 6. What should coalitions do in cases where School Readiness children were enrolled with a provider that does not have a School Readiness contract with their coalition?** EFS-Mod was designed to allow parents to select a provider of their choice, regardless of whether or not the

provider has a School Readiness contract. The system was also designed to allow coalitions to view all providers across the state. It is important for coalition staff to check the **Contracts** tab, located in the **Administrative Review** section of provider profiles in EFS-Mod, to determine if an active School Readiness contract with your coalition exists prior to enrolling a child with that provider.

If a child was enrolled with a provider that does not have a School Readiness contract with your coalition, a settlement agreement would need to be established to reconcile payments for the time period where no School Readiness contract was in place.

- 7. How long do coalitions have to reimburse providers, in the case of an underpayment?** If the underpayment is identified before the payment cycle closes and the provider has submitted supporting documentation, coalitions are expected to pay the provider for the underpayment within that payment cycle. If the underpayment is identified after the payment cycle closes, coalitions are expected to pay the provider on the next payment cycle.
- 8. How long should coalitions give providers to repay coalitions, in the case of an overpayment?** OEL is granting local discretion in determining the length of the repayment plan. Based on the amount of the overpayment and consideration to the impact to the provider, the coalition can either recoup the overpayment with the next payment or establish a repayment plan. To align with OEL Program Guidance 240.03 for collections of delinquent accounts, OEL recommends repayment plans not to extend beyond six months; however, coalitions should work with their providers on a case-by-case basis to recoup the funds as quickly as possible, while considering the impact to the providers.
- 9. What should coalitions do if they have providers who refuse to repay the coalition, in the case of an overpayment?** Generally, coalitions should follow the collections process within OEL Program Guidance 240.03 – Collection of Delinquent Accounts to recover overpaid funds. Email OEL Questions at oel.questions@oel.myflorida.com to provide details and request guidance on a case-by-case basis.
- 10. What should coalitions do in cases where they have paid providers for children who are no longer eligible for School Readiness funding?** Follow the guidance in **question eight** of this document. Special circumstances should be emailed to OEL Questions at oel.questions@oel.myflorida.com to provide details and request guidance on a case-by-case basis.
- 11. Parent copay amounts in EFS-Mod are not always correct on payment certificates that providers receive. As a result, some providers have been collecting the wrong copay amount from parents. How should this be handled?** The coalition must follow the provisions specified in rule 6M-4.400(8) and (9), FAC. If the parent copay error is caused by an incorrect copayment assessment in EFS-Mod, the coalition shall **not** take action to recover the incorrect copayment made. The coalition must correct the error and apply the corrected copayment **from that point forward**. If it is found that the parent was assessed a copayment that was too high, the following is required.
 - Suspend the parent copayment in EFS-Mod using the fee waiver option. Set the start and end dates to correspond with the amount owed back to the parent for assessing a too-high copayment.
 - Send a notification to the parent and the provider explaining the error and the corrective action taken.
 - Document the adjustment in EFS-Mod for audit purposes.
- 12. Tax questions relating to provider 1099s.** Providers should consult with their tax accountant regarding tax concerns.

13. What are best practices in terms of assisting providers with completing and submitting attendance through the statewide provider portal? It is a challenge for coalition staff since coalitions do not have view of what the provider sees when they enter their attendance. OEL recommends that coalitions hold in-person provider portal trainings to the greatest extent possible – both one-on-one and in group settings. If an in-person training is not possible, OEL recommends assisting providers over the phone, using a screen share tool, such as GoToWebinar, Zoom, or Teamviewer.