

## 2019-20 ACCOUNTABILITY REVIEW PROCESS ATTACHMENT 3

### Biennial Review Process

1. OEL will send the *notification letter* to coalitions or statewide contractors no later than four weeks prior to the review start date. The notification letter will include an initial document request; due dates for the document request; a schedule of important monitoring events; and a certification/questionnaire about the coalition's adherence to its approved school readiness (SR) plan.
2. *Entrance conference* for on-site reviews will typically occur the first day of the on-site visit. There may be exceptions to this process for circumstances beyond the control of the on-site team or coalition staff.
3. *Review components*
  - a. Eligibility/Payment Validation
    - i. OEL will review all 30 coalitions and three statewide contractors biennially. OEL may review some additional coalitions on an annual basis due to other risk factors (e.g., change in service delivery model; amount of funding; special review requests).
    - ii. OEL will conduct on-site reviews of 16 coalitions and one (1) contractor during the 19-20 fiscal year.
    - iii. Areas covered during this review will include SR, voluntary prekindergarten (VPK) child eligibility and VPK provider eligibility. Due to the implementation of EFS modernization, payment validation reviews will be conducted based on available data and system functionality. OEL will sample data for each review that will include sample files from the previous fiscal year and current fiscal year.
    - iv. Payment validation compliance observations determined to be a provider error (attendance reporting discrepancies) will not appear in the final report. However, the coalition will be required to submit or facilitate corrective actions to correct any errors.
  - b. Programmatic Performance
    - i. Review areas are Coalition Governance (CG), Operations and Program Management (OPM), Child Care Resource and Referral (CCRR), and Educational Service Delivery (ESD).
    - ii. The programmatic review period will start on July 1, 2018, and will typically include the time period leading up to the date of the post-site (official) exit conference.
    - iii. OEL will complete the programmatic areas for all coalitions as a desk review.
    - iv. Areas covered during this review will be compliance and implementation of prior review corrective action plans, as well as the areas identified in the Program Integrity Monitoring Guides.
  - c. Data Accuracy-Edit and Exception Reports
    - i. The Data Services Unit has created Tableau reports to assist OEL and the coalitions with compliance with data correction requests and data cleansing activities. The reports may identify instances in which there is missing, invalid or inaccurate information.

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- ii. OEL will select edit and exception reports for review during the biennial reviews to identify errors that will require coalition follow-up and review team validation.
  - iii. OEL will review the 30 coalitions and RCMA biennially.
  - iv. Each coalition or contractor scheduled will receive a desk review of edit and exception reports during the 2019-20 fiscal year, as applicable.
4. OEL will send a **document request** to the coalitions for additional documentation, as needed.
  5. OEL may conduct **phone interviews** prior to the beginning of the onsite, if necessary. If there is a need for additional interviews during the pre-site, on-site or post-site review process, OEL will inform the coalition in advance to schedule.
  6. OEL will send surveys to a random sample of providers for the review in lieu of the onsite provider focus group. OEL may conduct a provider focus group if survey results indicate a need for the providers to provide additional feedback regarding their relationship with the coalition/RCMA. Coalitions will receive a Provider Survey Questionnaire to assist OEL in gaining an understanding of the coalition's policy and procedure changes that the coalition implemented, if any, as a result of the survey of contracted providers.
  7. **Commencement of on-site** reviews will typically include the **entrance conference** on the day of the review team's arrival. The onsite review may include SR and VPK file review, document collection and other on-site monitoring activities required to maximize the on-site team's visit (e.g., provider focus groups, staff and board member interviews, and observations of CCR&R and eligibility intake processes).
  8. **Preliminary findings briefing** will occur on the last day of the on-site or approximately three to five business days following the onsite review, if there is a need for additional time to complete the documentation of the preliminary observations. The preliminary findings briefing will give the OEL and the coalition/RCMA an opportunity to discuss the preliminary findings made during the pre-site and on-site visit. The coalition will have 10 business days to submit a response to OEL's preliminary findings. **Note:** Eligibility and Programmatic scorecards will be completed during the post-site review. Findings of non-compliance based on the scorecard analysis may be added or deleted during the post-site review phase. The results from the scorecard analyses will be compiled and presented to the coalition in the draft report. The eligibility and programmatic scorecards will be uploaded to SharePoint for coalition/contractor review upon issuance of the draft report.
  9. **Post-site review** will include finalization of the working papers, document citations and additional follow-up with the coalition as needed. **Note:** Findings of non-compliance may be added or deleted during the post-site review phase.
  10. OEL will conduct the **official exit conference** by phone, approximately 30 calendar days after the end of the post-site review period, to review the draft report. During the exit conference, OEL will have a verbal discussion with the coalition of the preliminary eligibility and programmatic findings in the draft report. The courtesy review period will begin immediately after the coalition receives the draft report. During the courtesy review period, the coalition has 10 business days to respond to the draft report and management addendum to the draft report. This period permits coalitions to submit documentation that OEL will review and determine either to remove findings or to accept corrective action. OEL will incorporate these determinations in the final report. The management addendum to the draft report provides business practice suggestions for the coalition's consideration and does not require a coalition response. However, in some instances the management addendum will reflect business practices that if not implemented will become a finding in the coalition's next accountability review.
  11. **Accountability report** – After the monitoring team completes its post-site review, OEL will document the observations in a draft report and send to the coalition/contractor as a courtesy review approximately 90 days from the end of the on-site visit. After OEL receives and processes the coalition's courtesy review responses, OEL management will review and finalize the draft report. OEL will subsequently publish the final report and send it to the coalition. While it is OEL's objective to have the draft report available as soon as possible in order to facilitate timely

feedback, there may be instances where the need for additional research, documentation, and communication (on behalf of the coalition/contractor and OEL to ensure report accuracy and provide needed technical assistance) causes delays in the report's final publication.

12. ***Corrective action plan and case corrections*** – The coalition must respond to all findings with a corrective action plan (CAP) and additional documentation that will correct the findings that the coalition did not address during the courtesy review period. The coalition must submit its CAP and case corrections within 30 calendar days after OEL publishes the coalition's final report. OEL will accept the CAP if the corrections address and resolve all findings. After the review closes, OEL will review any pending corrective actions for implementation in 30-day increments following the review closure date.
13. ***Review is closed.***

### **Edit and Exception Report Technical Assistance**

For the 2019-20 monitoring cycle, OEL will be reviewing SR and VPK duplicate enrollment and payment reports, where applicable, based on the deployment of the new Statewide Information System. The plan of action will be to run these edit reports, at least monthly for each early learning coalition and RCMA. Each coalition and RCMA will receive a report detailing potential overpayments and corrective action reporting instructions that are to be submitted to the Office. The Office will ensure that monitoring actions and coalition resolution of errors will be documented.