

**Division of Early Learning
2021-22 Accountability Review Process
Attachment 3**

Biennial Review Process

1. The Division of Early Learning's (DEL) Accountability Section (AS) will send the Accountability Review **notification letter** to coalitions and the statewide contractors no later than four weeks before 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 policies and procedures.
2. AS will review all 30 coalitions and three statewide contractors biennially. AS may review some coalitions or contractors on an annual basis due to other risk factors (e.g., change in service delivery model, amount of funding, special review requests).
3. During the 2021-2022 fiscal year, AS will conduct reviews of 16 coalitions and one contractor.
4. **Review components**
 - a. Eligibility/Payment Validation
 - i. Review areas are School Readiness (SR), Voluntary Prekindergarten Child Eligibility (VPKC) and VPK Provider Eligibility (VPKP). AS will sample data for each review that will include, when possible, files from the previous fiscal year and the current fiscal year.
 - ii. Payment validation (SRPV and VPKPV) compliance observations that AS determines to be provider errors (ex. attendance reporting discrepancies) will not appear in the final report. Provider errors will appear in the draft report and AS will note them in the courtesy review response before removing them from the final report. However, the coalition must still submit a corrective action plan for the files.
 - b. Programmatic Performance
 - i. Review areas are Child Care Resource and Referral (CCRR), Coalition Governance (CG), Operations and Program Management (OPM) and Educational Service Delivery (ESD).
 - ii. The programmatic review period will start on July 1, 2020, and will typically end shortly before the date of the post-site (official) exit conference.
 - iii. AS will review compliance and implementation of prior review corrective action plans, as well as criteria identified in the Program Integrity Monitoring Guides.
 - c. Data Accuracy (DA) – Edit and Exception Reports
 - i. The Accountability Section runs edit and exception reports to assist coalitions with managing compliance with data correction requests and data cleansing activities. The reports may identify instances in which there is missing, invalid or inaccurate information.
 - ii. During biennial reviews, AS will review edit and exception reports to identify errors that require coalition follow-up and review team validation. This may require coalitions under review to communicate with other coalitions to reconcile data.
5. AS will send a **document request** to coalitions for additional documentation, as needed.

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6. AS may conduct *phone interviews* before or during the review. If there is a need for interviews during the review process, AS will inform the coalition in advance and schedule the interviews.
7. **Commencement of monitoring review activities** will typically include the *entrance conference* on the first day of the scheduled review. The first review activities will include DA, SR and VPK file reviews and document collection, and may include other monitoring activities.
8. The *preliminary findings briefing* will occur after the conclusion of the SR and VPK eligibility and payment validation and DA reviews. The preliminary findings briefing will give the coalition an opportunity to discuss the preliminary findings with AS staff regarding these areas only. The coalition will have 10 business days to submit a response and supporting documentation to DEL's preliminary findings. **Note** – AS will complete eligibility and programmatic scorecards during the post-site review. AS will compile the results from the scorecard analyses and present them to the coalition in the draft report.
9. The *post-site review* will include finalization of the working papers, document citations and additional follow-up with the coalition as needed. **Note** – AS may add or remove noncompliance findings or training issues during the post-site review phase.
10. AS will conduct the *official exit conference* , approximately 30 calendar days after the end of the post-site review period, to review the draft report. During the exit conference, AS will conduct a verbal discussion with the coalition regarding preliminary eligibility and programmatic findings and training issues in the draft report and draft management addendum. During the courtesy review period, the coalition has 10 business days, from the day the coalition receives the draft report, to respond to the draft report and draft management addendum. This period permits coalitions to submit documentation that AS will review to determine whether to remove findings or accept corrective actions. AS will incorporate these determinations into the final report. The management addendum to the draft report mostly provides business practice suggestions for the coalition's consideration and does not require a coalition response. However, in some instances, the management addendum will include observations that will become a finding in the coalition's next accountability review if the coalition does not implement a corrective action.
11. **Accountability report** – After the monitoring team completes its post-site review, AS will document the observations in a draft report and send it to the coalition/contractor as a courtesy review approximately 79 days from the end of the initial scheduled review date. After AS receives and processes the coalition's courtesy review responses, AS management will review and finalize the draft report. AS will subsequently publish the final report and send it to the coalition. While it is AS's objective to publish the final report as soon as possible, there may be instances where the need for additional research, documentation and communication (on behalf of the coalition/contractor and AS to ensure report accuracy and provide needed technical assistance) causes delays in the report's final publication.
12. **Corrective action plan and case corrections** –
 - a. The coalition must respond to all findings with a corrective action plan (CAP) and additional documentation to correct 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 AS publishes the coalition's final report. AS will accept the CAP if the corrections address and resolve all findings. After the review closes, AS will review any pending corrective actions for implementation in 30- to 90-day increments following the review closure date.
 - b. If the coalition has repeat findings from the previous accountability review, AS may require the coalition to submit quarterly reports for up to two quarters after the review closes. These reports are separate from the coalition's corrective action plan and AS uses them to verify that the coalition is implementing its submitted and accepted corrective action plan. Their due dates will vary based on the date AS publishes the report.
13. **Review is closed.**