Summer Transition Program 2019
Rising Kindergarten
Operating Guidelines

INTRODUCTION

This document outlines the requirements and regulations for operating a Summer Transition Program (STP). To ensure program compliance and quality service, all STP providers must be familiar with and implement these guidelines. This document is intended to provide clarity and to offer guidance to Pre-K STP providers. Bright from the Start makes all funding decisions for the Summer Transition Program. Pre-K Consultants make site visits throughout the six-week program to review compliance and provide support. Providers who do not comply with the STP Guidelines will not be eligible to receive a STP grant during the 2019-2020 school year.
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1.1 Purpose
The purpose of Georgia’s Pre-K Summer Transition Program (STP) is to provide a six-week intensive academic program to support rising kindergarteners who either did not attend a Georgia's Pre-K or Head Start program or attended but need additional support before entering Kindergarten.

1.2 Days of Service
Each STP provider is required to submit a calendar into the PANDA System for approval. The STP calendar must document a minimum of 29 instructional days/188.5 hours for students and 5 professional development/planning days for lead and assistant teachers. Transition Coach’s dates of employment documented should equal 10 weeks.

2.0 Child/Family Eligibility

2.1 Age Requirement
Children must be four years of age on September 1, 2018, based on acceptable documentation, such as birth certificates, certificates of live birth, passports, official medical documents, legal documents, or official documents from other countries. Only children whose birthdates are from September 2, 2013, through September 1, 2014, are eligible for participation in the Summer Transition Program. Children should be age eligible to attend kindergarten for the 2019-2020 school year. Proof of age eligibility must be on file the day the child begins the STP program.

2.2 Citizenship Requirement
The child must be a U.S. citizen or have established status as a lawfully admitted qualified alien to participate in the Summer Transition Program. Only the child must have their citizenship or alien status verified.

2.3 Residency Requirement
The child must be a Georgia resident. For purposes of this program, Georgia resident is defined as a child who resides in the state of Georgia. Proof of residency should be part of a child’s on-site file prior to or on the first day of the program. When documenting residency, Pre-K providers should refer to the policy of the local school system regarding appropriate documentation. Examples of proof of residency include the following: current lease, property tax notice, homeowner’s insurance bill, mortgage statement, current vehicle registration form, letter from shelter, letter from employer if employer provides housing, and any utility bill listing the residence as the service address. A cell phone bill or a driver’s license is not an acceptable proof of residency. If a student’s family is living with someone else, parents should provide a notarized affidavit from the property owner stating where the child’s family is residing, plus a copy of the property owner’s proof of residency (any items listed above). Active duty military families can support Georgia residency with a copy of official military orders verifying Georgia residency during the school year.
2.4 Family Income Requirement
A child’s family must meet income requirements to be eligible for participation (85% of the state median income).

All families should complete the Eligibility Information Form. If the child and/or family participates in one of the following programs and participation is verified, the family automatically meets the state median income requirement: Child Care and Parent Services (CAPS), Medicaid, Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF). Verification of current participation must be kept in the student’s file.

If current participation in one of the aforementioned programs cannot be verified, the STP provider must complete the Income Eligibility Worksheet to determine eligibility prior to enrolling the child in the program. Appropriate documentation of income eligibility must be collected and kept in the student’s file. All forms for eligibility verification can be found under the Summer Transition Program tab on the DECAL website at http://www.decal.ga.gov/Prek/SummerTransitionProgram.aspx

If the Income Eligibility Worksheet is used, STP providers should use the State Median Income (SMI) chart to determine income eligibility by family size. The following individuals living in the household shall be included in the family unit:

- Biological, adopted, or step children 17 years of age or younger
- Children under legal or physical guardianship of the parental authority
- Spouse/parent residing in the home
- Unmarried adults living together with a mutual biological or legal child(ren) residing in the same household
- Spouse/parent temporarily absent from the household due to employment, military deployment, training, or education
- It does NOT include other adults in the household (such as grandma or an uncle or a family friend) or the children of other adults in the household

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<th>Family Unit Size</th>
<th>Federal Limit - 85% SMI</th>
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State Median Income (SMI)
** Covers the period of October 1, 2018 through September 30, 2019**
2.5 **Family Participation Requirement**

The *Summer Transition Program Parent Agreement* form must be completed by each participating family. A parent must agree to send the child to the Summer Transition Program for 6.5 hours of instructional time for the full six weeks.

3.0 **Enrollment**

3.1 **Open Enrollment**

Enrollment for the program must be open and nondiscriminatory. Children cannot be denied participation in educational programs on the basis of race, color, or national origin (Title VI of the Civil Rights Act of 1964); sex (Title IX of the Educational Amendments of 1972 and Title II of the Vocational Education Amendments of 1976); or disability (Section 504 of the Rehabilitation Act of 1973 and The Americans with Disabilities Act of 1990).

3.2 **Homeless Children**

Bright from the Start recognizes that children and their families who experience homelessness deal with many challenges. STP providers are encouraged to examine their existing enrollment policies to address homeless families seeking to enroll. Providers choosing to give priority to eligible homeless children should clearly define this practice in their written enrollment policies. Providers should contact their Pre-K consultant if guidance is needed.

Homeless children are defined as individuals who lack a fixed, regular, and adequate nighttime residence. This includes children and youth who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, or camping grounds due to the lack of alternative accommodations. This also applies to those that have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings; like cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings.

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3.3 **Children in Foster Care**

Children in foster care that meet the enrollment priorities outlined in section 3.4 automatically qualify for the STP regardless of family income. Documentation to support placement in foster care must be provided. Providers should contact their Pre-K Consultant if guidance is needed.

3.4 **Enrollment Priorities**

Children enrolled in the STP program should meet the following criteria:

- Child did not attend a Georgia’s Pre-K Program or Head Start program during the 2018-2019 school year (targeted population) **OR**
- Child attended a Georgia’s Pre-K or Head Start program but did not attend the entire school year **OR**
- Child attended a Georgia’s Pre-K or Head Start program the entire year but has been identified as needing additional academic support before entering Kindergarten (i.e. teacher recommendation, WSO data) **OR**

A child must be part of one of the following PRIORITY GROUPS:

- Dual Language Learner (home language is a language other than English)
- Foster Care placement
- Child’s family is without permanent housing (homeless as defined by McKinney- Vento Homeless Assistance Act)
- Child with an Individual Education Program (IEP)

Providers should establish a written procedure outlining their process for student enrollment.

3.5 **Child Registration Forms**

The Summer Transition Program – Child Registration Form must be used when registering a child for the Summer Transition Program. Forms are available at http://www.decal.ga.gov/Prek/SummerTransitionProgram.aspx under the Rising K tab. A parent or guardian must complete and sign a registration form for each child registering in the program. The complete child registration form must be filed in each child’s file and kept on-site for review.

3.6 **Student Social Security Numbers**

Social security numbers are used to help identify students on rosters. Providers should request a copy of each enrolled student’s social security card; however, parents cannot be required to submit the information. If a parent chooses not to submit the social security card, providers should ask the parent to complete the **Student Social Security Number Information Form** which can be found at www.decal.ga.gov under the 2018-2019 Pre-K Providers’ Operating Guidelines as Appendix B. If the provider has a similar form or SSN waiver, they may choose to use that form. A copy of each student’s social security card or completed **Student Social Security Number Information Form** (or similar form) should be kept on-site for review by the Pre-K Consultant.

3.7 **Procedures for Student Attendance**

Daily attendance records must be maintained on site and include the dates when a child is absent and the dates/times when a child arrives late or leaves early. STP providers should formulate written procedures for addressing issues regarding attendance and tardies. The attendance
procedures should specify actions to be taken by the STP provider if attendance issues become problematic. For the Summer Transition Program, it is expected that attendance issues be followed up on each day the child is absent or tardy by the transition coach. Home visits, parent meetings or phone conferences should be conducted to address attendance issues. Documentation of each attempt to follow-up with families should be maintained on site. Written notification to families can be used to document follow-up but cannot be used as the sole follow-up activity. The goal of follow-up is to determine the reason(s) for the problem and identify ways to resolve the problem. The goal of the attendance policy is to assist families in establishing and maintaining regular school attendance patterns which will ensure success in kindergarten and future educational activities.

A child who is chronically tardy or absent can be disenrolled from the program. A child who is not enrolled in the extended day program and is not picked up at the end of the STP day on a regular basis can be disenrolled.

4.0 Student Support

Children grow and develop at their own rate. Although there is a general predictable sequence of milestones, they may not proceed through these stages in the same way or at the same time. A child's development is influenced by many factors including the child's environment and experiences. Once children have had the opportunity to acclimate to the Pre-K classroom environment, normal differences in skills and behavior will be apparent. Sometimes a child will exhibit significant developmental, behavioral, or health issues that require special considerations. Providers should work with their Pre-K Consultant to ensure that support services are provided to children and their families. Programs may also contact their Regional Inclusion Specialist for assistance with referrals to services. A list of Inclusion Specialists can be found at [http://www.decal.ga.gov/CCS/InclusionSupportServices.aspx](http://www.decal.ga.gov/CCS/InclusionSupportServices.aspx).

4.1 Children with Identified Disabilities

A child who is age-eligible for the Rising Kindergarten program and is identified as eligible for special education and/or related services under the Individuals with Disabilities Education Act (IDEA) shall not be denied access to the Pre-K program.

4.2 Children with Developmental Concerns

Providers with concerns about a child's development should contact their Pre-K Consultant for support and guidance. Providers should ensure that appropriate instructional activities are planned to meet the needs of the individual children. The consultant may recommend contacting the local school system's special education services department for information regarding the referral process.

4.3 Children with Behavioral Concerns

Providers with concerns about a child's behavior should contact their Pre-K Consultant for support and guidance. A multi-tiered system of supports should be implemented within the program to help the child be successful before requesting more intensive interventions, such as modified day or extended suspension. An effective multi-tier system of supports includes the child, family, and teacher. Building supports at every level is beneficial to the child's success.

Note: Providers should follow any rules and regulations set forth by its governing body regarding
intensive interventions.

4.4 Student Discipline
Georgia’s Pre-K is a division within Bright from the Start: Georgia Department of Early Care and Learning (DECAL). Georgia’s Pre-K Program’s policy regarding discipline is consistent with the Core Rules in the Rules for Child Care Learning Centers, Chapter 591-1-1-.11 (discipline) as follows:

Disciplinary actions used to correct a child’s behavior, guidance techniques and any activities in which the children participate or observe shall not be detrimental to the physical or mental health of any child in Georgia’s Pre-K Program. Personnel shall not: physically or sexually abuse a child or engage or permit others to engage in sexually overt conduct in the presence of any child enrolled in their program; inflict corporal/physical punishment upon a child; shake, jerk, pinch or handle a child roughly; verbally abuse or humiliate a child which includes, but is not limited to, the use of threats, profanity or belittling remarks about a child or his family; isolate a child in a dark room, closet or unsupervised area; use mechanical or physical restraints or devices to discipline children; use medication to discipline or control children’s behavior without written medical authorization issued by a licensed professional and given with the parent’s consent; restrict unreasonably a child from going to the bathroom; punish toileting accidents; force feed a child or withhold feeding a child regularly scheduled meals and/or snacks; force or withhold naps; allow children to discipline or humiliate other children; confine a child for disciplinary purposes; commit any criminal act, as defined under Georgia law which is set forth in O.C.G.A. Sec 16-1-1 et seq., in the presence of any child enrolled in the program.

4.5 Immediate Suspension
An immediate suspension for up to two days can be made at any time the Pre-K provider determines a child is causing harm to himself/herself or others; or, a child is unable to successfully participate in program activities. The purpose of immediate suspension is to allow the program an opportunity to plan for the child’s successful participation in the Rising Kindergarten program and should not be used as punishment. Programs should contact their consultant if they need assistance with developing plans. Programs can implement immediate suspension up to two days at a time (no more than five days during the summer) per child. No Bright from the Start prior approval is needed; however, the program’s Pre-K Consultant must be notified, using the Suspension Notification Form (Appendix E), that such action has been taken within 24 hours.

If all five immediate suspension days have been used and a child is a danger to self, peers, or staff, the child may be sent home for the day while developing a plan for the child’s successful return. Programs should use the following procedure:

- Contact their Pre-K Consultant immediately. The consultant will follow up with the Regional Inclusion Specialist to consider accommodations.
- Prepare all documentation of behaviors and intervention strategies used to address concerns. The documentation must state the behavior, how often the behavior occurs, the interventions used, and the child’s response to the interventions.
- Support provided to the teacher to help the teacher address concerns (inclusion specialist, resources, professional development, etc.).
- Schedule a conference with the child’s family to discuss strategies and options. Document the conference.
5.0 Instruction

5.1 Approved Curricula
Each newly funded STP classroom will be provided the Opening the World of Learning (OWL) curriculum. All instruction should be based on the OWL curriculum and the Georgia Early Learning and Development Standards (GELDS). Continuation classes should inventory their curriculum supplies and materials and purchase any items that are missing.

5.2 Religious Instruction
No part of the STP instructional day may be religious in nature. Programs may choose to offer religious instruction outside of the STP instructional day. No STP funding may be utilized for religious instruction.

5.3 Lesson Plans
It is recommended that STP teachers use the pre-printed lesson plans provided with the OWL curriculum books.

5.4 Record Keeping
Current year records must be maintained at the STP site. The STP provider must retain the following records for a minimum of three years as specified in their grant agreement for STP services:
- STP Child Registration form
- STP Student Roster Information form
- Eligibility Information Form and supporting documentation
- Family income verification documentation
- STP Roster Form
- Daily child attendance records
- Class enrollment rosters
- Age documentation
- Residency documentation
- Citizenship documentation
- Documentation related to suspension and/or disenrollment
- Parent orientation documentation
- Receipts and other financial records supporting expenses charged to the STP program

6.0 Materials and Supplies

6.1 STP Classroom Materials and Supplies
STP providers must maintain adequate and appropriate equipment, materials, and supplies for each STP classroom. All classroom items must be in good repair. Providers should refer to the Rising Kindergarten Materials List and the Georgia’s Pre-K Program Basic Equipment, Materials, and Supplies Inventory List for recommendations for the STP classroom. The Rising Kindergarten Materials List is located under the Teachers tab at http://www.decal.ga.gov/Prek/SummerTransitionProgram.aspx.
7.0 Delivery of Services

7.1 Program Administration and Supervision
Each STP grantee must designate an administrator to oversee the program. Each separate site housing STP classes must have an individual designated to serve as Site Director. The Site Director should be located on site at the STP facility during the 6.5 hour instructional day. The designated Site Director can have other duties but should be able to focus on the operation of the program during the 6.5 hour day. Persons with other responsibilities such as teaching in another classroom or preparing meals do not meet the requirements to serve as a Site Director. A STP Lead Teacher, Assistant Teacher or Transition Coach may not also serve as Project Director or Site Director.

7.2 Classroom Delivery
Each STP classroom must have the following:
- Two adults (lead teacher, assistant teacher, and/or substitute) must be present and actively involved with children during the entire 6.5 hours of instructional time each day of operation, with the exception of nap time
- Approved equipment, materials, and supplies
- Transition coach

Note: The maximum class size is 16 students. The program must maintain a 1:8 teacher/child ratio.

7.3 Program Delivery
The program will provide 6.5 hours of instructional time, a minimum of 29 days (188.5 hours) for eligible children. STP providers are required to prepare and provide a program calendar which includes a minimum of 29 days of instruction to children and 5 days of Pre-K related activities/duties for teachers (pre- and post-planning, staff development, in-service days).

7.4 Orientation
An on-site orientation for all teaching and administrative staff and an orientation for families must be provided prior to the beginning of the STP program. The STP calendar should be shared with STP staff and with families during orientation meetings.

During family orientation, parents should receive an overview of the program including any required parent involvement. Documentation of these orientation sessions should be available in on-site program files.

7.5 Licensing
The facility must meet the licensing requirements of the appropriate licensing agencies where applicable. At a minimum, the license must cover the 6.5-hour instructional program.

7.6 Substitutes
The STP provider must ensure that a substitute lead teacher and/or substitute assistant teacher is present and working in the STP classroom for each day that a lead teacher and/or assistant teacher is absent due to illness, required training, personal leave, etc.
7.7 Rest Time
To maximize instructional activities, rest time cannot exceed one hour per day except when necessary to address specific needs of individual children. Children who do not rest shall be given quiet activities such as books and puzzles. All children must have a covering (sheet) on their individual rest equipment (mat or cot) and a covering (blanket or sheet) for themselves. These items may be purchased with STP funds or families may choose to supply them. During the scheduled rest period, a ratio of one adult providing direct supervision to 16 children is acceptable.

7.8 Program/Staff Hours
The 6.5 hours of instructional time should begin no earlier than 7:30 a.m. with hours of operation as delineated in the original approved application. The remaining working hours of the lead teacher and assistant teacher must be used for STP program activities such as parent conferences, meetings, instructional planning, preparing for the next instructional day, etc. Inappropriate duties for STP teachers (lead and assistant) during the work day include bus driver, office manager, cook, and receptionist. Inappropriate use of STP staff is unacceptable and will make the grantee ineligible for future funding. This includes using staff during the STP day to supervise children not enrolled in the program.

7.9 Transportation
Transportation services are highly encouraged and may be provided for enrolled STP children at the discretion of the program. STP funds should be used to cover the cost of transportation services. Parents cannot be charged any fees for transportation services.

7.10 Extended Day (Before and After School Care)
Bright from the Start does not require STP providers to offer extended day services; however, providers are required to work with families needing extended day services to ensure the needs of the family are met. Families may receive services through the Childcare and Parent Services (CAPS) program if they meet ALL eligibility requirements.

- **If a family is not already receiving CAPS**, the Transition Coach should assist the family in completing the CAPS application using Georgia Gateway ([https://gateway.ga.gov/](https://gateway.ga.gov/)). After the family completes the application, the Transition Coach must obtain the following information from the parent:
  - Date of application submission
  - Tracking number

  The Transition Coach must notify the CAPS program that the family has submitted an application by selecting “Contact Us” in the upper right-hand corner on the CAPS website ([http://www.caps.decal.ga.gov/](http://www.caps.decal.ga.gov/)), then select and complete the necessary fields. If the family is eligible, CAPS will create the appropriate child care certificates to subsidize before and after child care services.

- **If the family already has a CAPS case**, the Transition Coach will instruct the family to submit a request to add the child transitioning off STP to their current CAPS case. The family must make the request by selecting “Contact Us” in the upper right-hand corner on the CAPS website ([http://www.caps.decal.ga.gov/](http://www.caps.decal.ga.gov/)), select and complete the necessary fields. A Family Support Consultant will contact the family to process the request.
8.0 Family Support Services

8.1 Objectives
Support services are a vital component to the success of the Summer Transition Program. Project directors are responsible for ensuring that transition coaches carry out the objectives (either directly or indirectly). The following objectives should serve as a guide for activities STP providers should provide to the children and their families:

Overall Objectives:
- Health – No child should exit the STP with an undetected condition that could hinder his/her ability to learn. Any child with identified needs should be referred to the proper resource or agency for access to and coordination of services. Documentation of referrals should be kept on-site.
- Child Development – Family knowledge of the child’s development and involvement in their child’s educational experience should be enhanced through informational seminars, volunteer opportunities at the center/school, parent/center conferences, etc. Families should be encouraged to read to their children daily and complete activities with their children.
- Community Resources – Upon request, families should be provided information about community resources such as GED, TANF, PeachCare for Kids, help in obtaining extended day services, etc.
- Kindergarten Readiness Initiative – Assistance should be provided to obtain all necessary documentation and health related requirements for kindergarten registration prior to the end of the Summer Transition Program.

8.2 Parent Participation
The STP provider must provide opportunities for parents to participate in their child’s educational experience. Parents should be encouraged to volunteer their time, talents, and experiences in the classroom.

8.3 Family Engagement Activities
The STP Transition Coach should conduct a minimum of one family workshop/engagement activity per week. Documentation of each activity should be kept on file for review. Topics for adult activities could focus on, engaging fathers, CPR training, promoting family conversations, community resources, children with challenging behaviors, language and literacy and other topics of interest to promote learning, and time management. Topics for adult/child activities could include kindergarten transition, cooking activities, exploring nature, dinner discussions, literacy learning, and science experiments. Documentation should include agenda and sign-in sheets. To plan additional activities, providers should survey families to identify topics of interest and need. An example of a family survey is located on the STP website at http://www.decal.ga.gov/Prek/SummerTransitionProgram.aspx

8.4 Health Services
Health screenings are necessary for STP students so that any problems that might interfere with the child’s ability to learn can be identified and addressed as soon as possible. All programs should ask parents the date of their child’s last health exam and provide a referral if an additional health screening is needed.
STP providers should ensure that all children have a current Certificate of Vision, Hearing, Dental, and Nutrition Screening (Georgia Department of Human Services Form 3300) and a DHS Certificate of Immunization (Form 3231). Form 3231 must have either the date of expiration or school attendance block checked. Children must be up-to-date on all immunizations required for school entry. If children are missing forms, STP providers should help families work on obtaining the required screenings prior to going to Kindergarten.

Children may register and begin attending before completion of these examinations and certificates. However, the DHS Certificate of Immunization and the Certificate of Vision, Hearing, Dental, and Nutrition Screening must be on file prior to the child completing the Summer Transition Program.

Expired certificates must be updated within 30 calendar days of the expiration date. An updated certificate, letter from a physician about continued treatment, or another appointment card should be included in the child’s documentation as follow-up for children attending kindergarten.

If a box on Form 3300 is marked Needs Further Evaluation, the transition coach must follow up on any “needs further examination” results and support families in identifying and receiving additional screenings, examinations, or treatments. Families should be asked to bring updated and completed certificates after each appointment and follow-up visit. The STP site should have documentation of the follow-up (i.e., doctor’s notes, scheduled appointments, information from parents, etc.).

9.0 Program Fees

9.1 Instructional Fees
Fees such as registration, curriculum fees, field trips, classroom supplies, etc. cannot be charged to any child/family for services needed to operate the instructional program during the program.

9.2 Field Trip Donations
Field trips are a part of the instructional program. Providers may not request a per child donation for field trips during the Summer Transition Program.

9.3 Transportation Fees
Providers may not charge fees for transportation services provided during the Summer Transition Program.

9.4 Meal Fees
Summer Transition Program providers may not charge fees for food for any child. STP funds should be used to cover meal costs.

Summer Transition Program providers should have a written policy regarding meals served at the program including whether or not outside food for meals is allowed in the center. Programs may set up their own policies regarding outside food; however, if the center allows food to be brought in for any other age group, then children enrolled in the Summer Transition Program must also be allowed to bring in outside food. Policies regarding meals should reflect compliance with the Americans with Disabilities Act.
STP providers have the opportunity to submit an application to participate in the Summer Food Service Program (SFSP) through DECAL. SFSP is a federal program that provides reimbursement for healthy meals and snacks served to children from low-income areas during periods when schools are closed for vacation.

Once an organization’s application has been approved and a successful pre-operational visit has been conducted, the organization will be considered an approved sponsor in the SFSP. Every organization must continue to comply with program regulations/guidance and maintain adequate records to support each monthly claim for reimbursement submitted and SFSP costs charged to the program.

Specifically, organizations must serve meals and snacks that meet the SFSP meal pattern and maintain daily records including, but not limited to, menus, number of participants in attendance, and number of meals served at each point of service. Organizations must also manage a fiscally sound and accountable program in which only reasonable and allowable costs are charged to the SFSP and must maintain SFSP related invoices and receipts. Moreover, sponsors must distribute and/or collect forms including, but not limited to, income eligibility statements as required by the SFSP.

For more information regarding SFSP services and how to apply, visit http://www.decal.ga.gov/Nutrition/NutritionServicesMain.aspx

### 10.0 Bright from the Start Monitoring and Technical Assistance

#### 10.1 Pre-K Consultant Support

Bright from the Start Pre-K staff work closely with STP providers and are available for consultation regarding on-site technical assistance, questions about the program, problems with maintaining enrollment, approval of equipment/materials/supplies requests, training needs, etc. Staff will provide specific technical assistance to help bring providers into compliance with STP requirements.

#### 10.2 On-Site Evaluation

Bright from the Start Pre-K staff will make announced and unannounced visits to STP sites to monitor and evaluate program progress. The monitoring process delineates the responsibilities of administrators and teachers.

### 11.0 General Personnel and Training Information

#### 11.1 Criminal Background Checks

All licensed Pre-K providers and staff are required to comply with O.C.G.A. § 20-1A-30 et. seq., which mandates that an individual must receive a satisfactory criminal record check determination prior to being present in any child care facility while children are present for care.

#### 11.2 Employees

All STP site personnel are employees of the STP provider for whom they work, not Bright from the Start or the State of Georgia.
12.0 **Lead Teachers**

12.1 **Days of Service**
All lead teachers for the Summer Transition Program are funded based on 7 weeks of 8-hour work days (6.5 hours of instruction, 1.5 hours of planning). Bright from the Start does not maintain personnel policies for teachers. Programs should provide teachers with a contract or work agreement outlining pay for the Summer Transition Program.

12.2 **Age Requirement**
All lead teachers must be 21 years of age or older. **Exception:** Lead teachers who have a valid bachelor’s degree or higher teaching credential do not have to meet the minimum 21 years of age requirement. The teacher must, however, meet the age requirement for the facility’s licensing agencies.

12.3 **Credential / Certification Requirements**
The minimum education requirement for a Summer Transition Program lead teacher is a bachelor’s degree in early childhood education or related degree. Lead teachers for the program must also have prior experience working with Georgia’s Pre-K Program.

12.4 **Salaries – Lead Teachers**
STP providers are required to pay lead teachers 100% of the salary amount (see section 15.4 for a breakdown of salary and benefit amounts) funded by Bright from the Start. If an employer or system decides not to offer benefits or if benefits have been allocated during the regular school year, the benefits amount can be utilized to pay additional salary over the minimum salary requirement or the funds can be expended in the Other STP Expenses category.

Note: Bright from the Start does not provide supplemental compensation for STP lead teachers.

13.0 **Assistant Teachers**

13.1 **Days of Service**
All assistant teachers for the Summer Transition Program are funded based on 7 weeks of 8-hour work days (6.5 hours of instruction, 1.5 hours of planning). Bright from the Start does not maintain personnel policies for teachers. Programs should provide assistant teachers with a contract or work agreement outlining pay for the Summer Transition Program.

13.2 **Employment Requirements**
An assistant teacher must be 21 years of age or older. **Exception:** Assistant teachers who have a valid AA credential or higher teaching credential do not have to meet the minimum 21 years of age requirement. The teacher must, however, meet the age requirement for the facility’s licensing agencies.

13.3 **Credential/Certification Requirements**
Assistant teachers are required to hold a minimum of a Child Development Associate (CDA) credential. Assistant teachers for the Summer Transition Program must also have prior experience working with Georgia’s Pre-K Program.

Any ONE of the following credentials/degrees listed below will meet the credential requirement for
STP assistant teachers:

- Valid Paraprofessional Certificate (issued by the Georgia Professional Standards Commission)
- Valid Child Development Associate (CDA) credential (issued by the Council for Professional Recognition)
- TCC (Technical Certificate of Credit) in Early Childhood Education
- TCD (Technical College Diploma) in Early Childhood Education
- AA, AS, AAS, AAT (Associate Degree)
- BA, BS (Bachelor’s Degree)
- Georgia PSC Certified Teacher
- MA, MS (Master’s Degree)
- Specialist Degree or PhD

13.4 Salaries – Assistant Teachers
STP providers are required to pay assistant teachers 100% of the salary amount (see section 15.4 for a breakdown of salary and benefit amounts) funded by Bright from the Start. If an employer or system decides not to offer benefits or if benefits have been allocated during the regular school year, the benefits amount can be utilized to pay additional salary over the minimum salary requirement or the funds can be expended in the Other STP Expenses category.

14.0 Substitute Teachers

14.1 Substitute Teacher Employment Requirements
The STP provider must ensure that a substitute lead teacher and/or substitute assistant teacher is present and working in the STP classroom (during the 29 instructional days) for each day that a lead teacher and/or assistant teacher is absent.

A substitute teacher must meet ALL of the following minimum requirements:

- Must be 21 years of age. Exception: Substitute teachers who have a valid AA credential or higher teaching credential do not have to meet the minimum 21 years of age requirement. The substitute teacher must, however, meet the age requirement for the facility’s licensing agencies.
- Possess a high school diploma or its equivalent
- Satisfactory Records Check Determination

15.0 Transition Coaches

15.1 Days of Service
Transition coaches will work 10 weeks or 200 hours to allow time for recruiting, program set-up and program closeout. Transition coaches in a one-class Summer Transition Program are funded at 20 hours per week (200 hours for the 10 weeks). Work hours should be flexible and will vary based on the best times to provide family engagement activities as determined by the parent surveys.

15.2 Credential Requirements
Transition coaches must have a minimum of an associate’s degree and experience working with families of young children.
15.3 Salaries – Transition Coaches
Providers are required to pay transition coaches 100% of the salary amount (see section 15.4 for a breakdown of salary and benefit amounts) funded by Bright from the Start. If an employer or system decides not to offer benefits or if benefits have been allocated during the regular school year, the benefits amount can be utilized to pay additional salary over the minimum salary requirement, cover the cost of travel associated with job responsibilities (recruitment, home visits, etc), or the funds can be expended in the Other STP Expenses category.

15.4 Salary Chart

<table>
<thead>
<tr>
<th>STP Position</th>
<th>Salary Amount paid to school (100% paid to position)</th>
<th>Benefit Amount paid to school (refer to 12.0, 13.0, 14.0)</th>
<th>Total Salary Amount + Benefit Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Private Lead Teacher Salary (7 weeks)</td>
<td>$6,469.17</td>
<td>$1537.07 (23.760%)</td>
<td>$8,006.24</td>
</tr>
<tr>
<td>Public Lead Teacher Salary (7 weeks)</td>
<td>$6,469.17</td>
<td>$2215.95 (34.254%)</td>
<td>$8,685.12</td>
</tr>
<tr>
<td>Assistant Teacher Salary (7 weeks)</td>
<td>$2,866.62</td>
<td>$681.11 (23.760%)</td>
<td>$3,547.73</td>
</tr>
<tr>
<td>Transition Coach Salary (total for one-half coach for 10 weeks per class)</td>
<td>$4,044.09</td>
<td>$960.88 (23.760%)</td>
<td>$5,004.97</td>
</tr>
</tbody>
</table>

16.0 Professional Development

16.1 Georgia Professional Development System (GaPDS)
The Georgia Professional Development System (GaPDS) is a database specifically for those who work directly with young children or on their behalf.

For individuals, the GaPDS combines education, experience and training and assigns all registrants a level on the “Career Level” chart. Supporting documents must be submitted to confirm educational attainment and training. Supporting documents include official transcripts, training certificates, copies of CDAs and technical college credentials. The Georgia Professional Standards Commission (GaPSC) reviews transcripts and credentials for the GaPDS to verify an individual teacher’s credentials and degrees. Until a teacher is enrolled in the GaPDS, the eligibility to serve in the lead or assistant teacher role has not been established. Project Directors must enter staff in PANDA, but the GaPDS is an individual – based system and staff must enroll themselves.

For individuals, the GaPDS combines education, experience and training and assigns all registrants a level on the “Career Level” chart. Supporting documents must be submitted to confirm educational attainment and training. Supporting documents include official transcripts, training certificates, copies of CDAs and technical college credentials. The Georgia Professional Standards Commission (GaPSC) reviews transcripts and credentials for the GaPDS to verify an individual teacher’s credentials and degrees. Until a teacher is enrolled in the GaPDS, the eligibility to serve in the lead or assistant teacher role has not been established. Project Directors must enter staff in PANDA, but the GaPDS is an individual – based system and staff must enroll themselves.

STP Teachers (lead and assistant teachers) must be enrolled in GaPDS before a student roster is submitted where they are assigned as the lead or assistant teacher in a classroom. A teacher hired after a roster submission (between submissions) must be registered prior to the next roster submission. A GaPDS number is required in PANDA for all STP lead teachers and assistant teachers. If a teacher has been certified as a Georgia teacher or paraprofessional through the Professional Development Standards Commission (PSC), the teacher should indicate this when
reimbursement policies to employees prior to travel; that providers discuss travel/expense policies
from the Start recommends that STP providers develop and distribute travel/expense
as travel expenses for staff when attending required
(lodging and meals in conjunction with overnight travel, mileage, parking, etc.) to all required STP
Summer Transition Program funds should be used to pay for costs associated with staff
summerschool@decal.ga.gov
Information to their sites and all personnel. The Project Director can register staff for
The
16
16.2 Importance of Training
To maintain quality standards, STP training is available for directors, transition coaches and new
lead teachers. Bright from the Start will verify documentation of staff attendance at training
sessions. Failure of providers and their staff to participate in required STP training shall place their
program in noncompliance and may jeopardize future STP funding.
16.3 Professional Development Registration
The STP Project Director is responsible for distributing professional development and training
information to their sites and all personnel. The Project Director can register staff for STP training
in the GaPDS. For help with professional development needs, STP providers should contact
summerschool@decal.ga.gov.
16.4 Professional Development/Training Reimbursement to Staff
Summer Transition Program funds should be used to pay for costs associated with staff travel
(lodging and meals in conjunction with overnight travel, mileage, parking, etc.) to all required STP
professional development/training sessions. STP funds should cover salaries and wages as well
as travel expenses for staff when attending required sessions.

Bright from the Start recommends that STP providers develop and distribute travel/expense
reimbursement policies to employees prior to travel; that providers discuss travel/expense policies
with employees; and that providers ask employees to sign a statement that they understand the policies before they travel.

17.0 Grant Award Notification and Budgets

17.1 Awarding of Grant Agreements
Providers will receive their 2019 STP grant agreements through PANDA. **For private child care centers, the Verification of Lawful Presence must be completed before a grant agreement will be issued.** DECAL will not issue any STP payments until the grant agreement is received and executed.

- Print one copy of each grant agreement received
- Contract signatory must sign each grant agreement
- Scan each signed grant agreement and email to summerschool@decal.ga.gov
- A copy of the executed grant agreement will be sent to you.

Signed grant agreements should be emailed no later than May 6, 2019.

17.2 Multi-County and Multi-Program STP Providers
Bright from the Start will issue one operating grant agreement containing separate funding amounts for each site. Funds are class-specific; therefore, STP providers must spend the required minimum levels for teacher salaries, transition coach salaries and supplies for each class at each site.

18.0 Expenditure Requirements

18.1 Expenditure Guidelines
The following expenditure guidelines apply to all STP providers:

- The STP provider may use no more than six percent of the budget for administrative expenses. However, when completing the reconciliation report, the provider should enter the total amount of allocated administrative expenses incurred even if the total amount exceeds six percent.
- Classroom supplies and materials should be selected from the Rising Kindergarten Materials List and the Georgia’s Pre-K Basic Equipment, Materials, and Supplies Inventory List.
- Appropriate expenditures for STP funds include, but are not limited to, transportation costs, meal costs, and operating expenses. Any operating expenses should be prorated to determine the appropriate STP allocation.
- Lead teacher, assistant teacher and transition coach salaries must be paid at 100%. Funding for benefits is flexible. The benefit amount can be utilized to pay additional salary over the minimum salary requirement or the funds can be expended in the Other STP Expenses category.
- The STP provider shall maintain full and complete program funding and expense records pertaining to the grant agreement for a period of three years beyond the ending date, or until all litigation, claims, or audit/review findings involving the records have been resolved if such claim or audit/review is started before the expiration date of the three-year period.
- If STP purchases are made by credit card, the credit card balance for the purchase must be paid off by July 31, 2019
18.2 **Record Keeping**
The STP provider is required to keep all receipts and other records necessary to support figures reported on the annual reconciliation statements. If a STP provider is audited and receipts and other records are not available to support these amounts, funds must be returned to Bright from the Start. Examples of such records include, but are not limited to:

- Canceled check copies (front and back)
- Bank statements
- Paid invoices
- Federal and state payroll records
- EFTPS or other evidence of taxes remitted to regulatory agencies
- Timesheets
- Summer Transition Program Grant Agreement
- Original receipts for equipment, materials, and supplies for STP classrooms
- Documentation of the STP portion of operating expenses
- Appropriate allocation methodology

Misuse of funds may result in denial of current and future participation in Georgia’s Pre-K Program, Summer Transition Program and/or in prosecution.

19.0 **Reimbursement Process**

19.1 **Automatic Deposit of Funds**
All payments will be deposited in the provider’s bank account via an Electronic Funds Transfer (EFT) process. Appropriate forms and instructions to allow for EFT were included in the Georgia’s Pre-K Program application package. Providers are responsible for the correct routing of their payments by promptly notifying Bright from the Start of changes in bank account information or ownership. Providers are responsible for reviewing their monthly payments and payment documentation each month.

19.2 **Schedule of Payments**
Payments will be made to STP programs in three payments. The deposit will occur within 3 to 7 business days from the processed date in PANDA. Payments may be delayed if the STP Grant Agreement has not been executed. All payments are subject to state data processing and bank processing delays.

The payment schedule will be as follows:

<table>
<thead>
<tr>
<th>Payments</th>
<th>Processed Date</th>
<th>Total Amount per Class</th>
</tr>
</thead>
<tbody>
<tr>
<td>Payment 1</td>
<td>Monday, May 20, 2019</td>
<td>$ 8,100</td>
</tr>
<tr>
<td>Payment 2</td>
<td>Monday, June 3, 2019</td>
<td>$ 8,100</td>
</tr>
<tr>
<td>Payment 3</td>
<td>Monday, June 17, 2019</td>
<td>$ 8,100</td>
</tr>
<tr>
<td></td>
<td></td>
<td>$ 24,300</td>
</tr>
</tbody>
</table>
### 19.3 Program Summary Charts

**STP funded at a private site**

<table>
<thead>
<tr>
<th>Role</th>
<th>Salary</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead Teacher</td>
<td>$8,006.24</td>
<td>Salary + Benefits</td>
</tr>
<tr>
<td>Assistant Teacher</td>
<td>$3,547.73</td>
<td>Salary + Benefits</td>
</tr>
<tr>
<td>Transition Coach ½ time</td>
<td>$5,004.97</td>
<td>Salary + Benefits</td>
</tr>
<tr>
<td></td>
<td>$7,441.06</td>
<td>Other STP Expenses*</td>
</tr>
<tr>
<td></td>
<td>$300.00</td>
<td>Student Transition Materials*</td>
</tr>
</tbody>
</table>

*Other STP expenses include classroom materials and supplies, meal costs, transportation costs, family engagement activities, student transition materials, field trips, and program operating costs.

**Total Per Classroom**

| Amount | 24,300 |

---

**STP funded at a public school**

<table>
<thead>
<tr>
<th>Role</th>
<th>Salary</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead Teacher</td>
<td>$8,685.12</td>
<td>Salary + Benefits</td>
</tr>
<tr>
<td>Assistant Teacher</td>
<td>$3,547.73</td>
<td>Salary + Benefits</td>
</tr>
<tr>
<td>Transition Coach ½ time</td>
<td>$5,004.97</td>
<td>Salary + Benefits</td>
</tr>
<tr>
<td></td>
<td>$6,762.18</td>
<td>Other STP Expenses*</td>
</tr>
<tr>
<td></td>
<td>$300.00</td>
<td>Student Transition Materials*</td>
</tr>
</tbody>
</table>

*Other STP expenses include classroom materials and supplies, meal costs, transportation costs, family engagement activities, student transition materials, field trips, and program operating costs.

**Total Per Classroom**

| Amount | $24,300 |

---

19.4 Rosters
Roster data is critical and must be accurate for students and teachers. Roster information is subject to audit and must be substantiated by enrollment and attendance records for students and documentation of credentials for teachers. Inaccurate roster reporting may impact future participation in the Summer Transition Program and/or Georgia’s Pre-K Program.

Rosters will be submitted in the PANDA Operating System and should include any changes made from the previous rosters. Dates must be accurate for beginning and ending points for children and teachers. Rosters will be open for data entry beginning May 1, 2019.

Adjustments in roster data should be made for the current roster period only.

Summer Transition Program roster due dates:

<table>
<thead>
<tr>
<th>Rosters</th>
<th>Count Date</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>First Roster</td>
<td>Monday, June 10, 2019</td>
<td>Friday, June 14, 2019</td>
</tr>
<tr>
<td>Second Roster</td>
<td>Monday, July 8, 2019</td>
<td>Friday, July 12, 2019</td>
</tr>
</tbody>
</table>

Failure to submit rosters by the due date will result in delayed payments. Rosters submitted after the due date may result in payments being processed by Bright from the Start after all other payments have been made.

19.5 Fraudulent Reporting on Rosters
Any person who knowingly and willfully makes a false, fictitious, or fraudulent statement or representation in a statement to a government agency may be guilty of a felony of a violation of Code Section 16-10-20 of the Official Code of Georgia. Any person, firm, corporation, or other legal entity that 1) knowingly presents or causes to be presented a false or fraudulent claim for payment or approval or 2) knowingly makes, uses, or causes to be made or used a false record or statement material to a false or fraudulent claim, shall be liable for civil penalties. The civil penalty can range from $5,500 to $11,000 for each false or fraudulent claim, plus three times the amount of damages sustained by the government because of such act pursuant to Code Section 23-3-121 of the Official Code of Georgia.

20.0 Audit and Accounting Requirements

20.1 Reconciliation Report
STP providers must provide Bright from the Start with a reconciliation report spanning the dates of the grant agreement. The purpose of the reconciliation report is to provide an actual accounting of all of the providers expenditures related to the Summer Transition Program. This report shall demonstrate that funds were spent in appropriate categories for their intended uses. Supporting documentation must be maintained and provided upon request from Bright from the Start. (See Section 18.1 and 18.2).

The STP Reconciliation Report is due by August 9, 2019. Failure to submit the STP Reconciliation Report by the due date may impact a program’s good standing status. If a provider does not submit the reconciliation report, Pre-K payments for the 2019-2020 school year will be held until the report is received or Pre-K funding for the school year may be terminated.
Funds paid by Bright from the Start for STP services can be used to cover costs of the STP program only and the STP program’s prorated share of other allowable expenses expensed through normal operation of the facility. Allowable expenses are those ordinary and necessary expenses directly benefiting or resulting from STP operations.

Generally Accepted Accounting Principles (GAAP) provides authoritative guidance that must be followed for identifying the appropriate basis for allocating shared costs. The basis of allocating costs should be similar to the unit of measure for incurring the costs or consuming the expensed item. Examples include using a square footage basis for rent/mortgage expenses and utilities, and a per person or average daily attendance basis is appropriate for office supplies, management staff, and transportation services if provided. Expenses must be allocated using the most logical basis for the costs incurred. For example, food costs would be allocated based on the number of children rather than square footage.

Expenses involving related parties must also be charged in accordance with GAAP. Related parties are one or more entities subject to the significant influence over the operating and financial policies of another entity. Providers involved in related party transactions with their centers should survey the surrounding business area and provide support that financial charges to the Pre-K program are within the range of same or similar arms-length transactions for their area. An example of related party transactions is when the owner of the facility is paid rent by the Pre-K program.

20.2 Right to Audit/Agreed Upon Procedures Review
Bright from the Start reserves the right to require an independent, certified financial audit of the Pre-K program at the Pre-K provider’s expense. Bright from the Start reserves the right to conduct Agreed Upon Procedures (AUP) reviews.

Bright from the Start may conduct audits and AUP reviews as specified in the Summer Transition Program Grant Agreement for the 2018-2019 school year, Section III, Part B:

Grantee agrees to cooperate fully with Grantor auditors and/or agents providing Audit or Agreed Upon Procedures (AUP) review services. Grantee will coordinate with auditors/reviewers to have appropriate staff available during the scheduled audit/review period. Grantee will make advanced preparations for scheduled audits/reviews to make available for auditors or reviewers all identified documents, records, and entity related materials requested by the auditors/reviewers for the current school year, as well as for prior school years in which Grantee participated in Georgia’s Pre-K Program as requested by the Grantor. Grantee’s failure to substantially prepare for a scheduled audit engagement or provide requested documentation or information to an auditor/reviewer during the scheduled audit period may result in the withholding of grant payments. The failure of Grantor to review and/or inspect the services provided or to discover a breach of this Grant or any amendment thereto shall not subsequently operate as a waiver of any remedies available to the Grantor.

If during the course of an audit there are negative audit findings, the provider may be scheduled for an audit for the subsequent school year at the discretion of Bright from the Start.

20.3 Record Keeping Findings and Adverse Findings
Findings noted during the course of the AUP review that do not result in a balance of funds due back to Bright from the Start are considered Record Keeping Findings. Examples include:

- Understatements of reported expenses compared to the STP Reconciliation Report.
• Overstatements of reported expenses compared to the STP Reconciliation Report.
• Variances between the expenditures reported on the STP Reconciliation Report and the allocable Pre-K STP expenditures supported during fieldwork.

Findings noted during the course of the AUP review that result in a balance of funds due back to Bright from the Start are considered Adverse Findings. Examples include:
• Failing to support unreimbursed food costs
• Failing to meet lead teacher, assistant teacher and transition coach salary requirements
• Failing to support that payroll taxes were forwarded to the relevant taxing authorities
• Failing to support that the use of all monies received from Bright from the Start were used in accordance with applicable regulations and guidelines.

20.4 Balances Due to Bright from the Start
If a STP program is unable to support its expenditures with receipts and other records as a result of having its financial records reviewed (AUP, audit, investigation), funds may be required to be returned to Bright from the Start. There are three options regarding these outstanding funds:
• Remit the balance in full by the deadline date
• Submit a payment plan proposal with a 10 percent good faith payment by the deadline date
• Submit all source documentation by the deadline date, disputing the results of the AUP review findings.

20.5 Audit Reconsideration
In order for an AUP review to be re-considered, providers must submit a formal request. The request:
• Must be written
• Must be made within 15 days of the notice of balance due letter from Bright from the Start
• Must include a detailed audit trail including all source documents necessary for Bright from the Start to make a final decision in a timely manner.

20.6 Random Reviews
The Pre-K provider is subject to random, unannounced expenditure reviews by Bright from the Start or Bright from the Start contract auditors during the program year. All records (programmatic and financial) must be retained for a minimum of three years as stated in the grant agreement.

20.7 Multi-County STP Provider Budgets
Multi-county STP providers must maintain at least a minimum of one STP budget per county for Bright from the Start reporting needs.

20.8 Tracking of STP Funds
The provider must maintain financial records to track STP expenditures in accordance with generally accepted accounting principles (GAAP). All records must be retained for a minimum of three years as stated in the grant agreement.

The provider is required to keep all receipts and other records necessary to support figures reported on the STP reconciliation statement. If a program is audited and receipts and other records are not available to support these amounts, funds must be returned to Bright from the Start. Examples of such records include federal and state payroll records to verify payment of lead
teacher, teacher assistant and transition coach salaries, original receipts for equipment, supplies, and materials for STP classrooms, and documentation of the STP portion of operating expenses.

20.9 Fraudulent/ Inappropriate Use of Funds
The provider shall ensure that expenses charged to the STP funding source are not concurrently charged to another program funding source. Providers with the Child and Adult Care Food Program or the Summer Food Service Program (SFSP), who are placed on the seriously deficient list and terminated from the food program, shall also be terminated from the Summer Transition Program and Georgia’s Pre-K Program. Providers who are terminated from the CAPS program shall also be terminated from the Summer Transition Program and Georgia’s Pre-K Program. The provider must ensure that no STP funds are used to pay penalties associated with adverse actions imposed by licensing or governmental agencies. STP expenditures should be identifiable as separate from federal expenditures (e.g., Head Start, CACFP).

Misuse of funds may result in repayment of funds and denial of current and future participation in Georgia’s Pre-K Program, Summer Transition Program, and/or in prosecution. Funds due are to be repaid within 12 months.

21.0 Reporting Requirements

21.1 Pre-K Application and Database Access (PANDA) Participation
STP providers are required to use the PANDA system to conduct STP related activities (rosters, application). Regular access to the internet and an e-mail address are required to use PANDA. Using PANDA allows providers to receive regular STP payments as quickly as possible and reduces duplication of provider efforts related to child roster data.

22.0 Non-Compliance Funding Consideration

22.1 Non-Compliance
Instances involving noncompliance with the Summer Transition Program Operating Guidelines can impact a program’s good standing status and jeopardize future STP funding. A Summer Transition Program grant agreement may not be offered for the following reasons:

- Missing student enrollment and eligibility documentation (section 2.0)
- Failure to meet enrollment eligibility and priority levels (section 3.4)
- Disenrollment or extended suspension without prior approval (section 4.5)
- Failure to offer the required number of family engagement activities (section 8.3)
- Lack of credentialed staff (sections 12.0, 13.0, 14.0 and 15.0)
- Failure to attend required training (section 16.2)
- Inaccurate roster reporting (section 19.5)
- Failure to follow expenditure guidelines (section 18.0)
- Failure to submit required reports, information and documents to Bright from the Start by due dates (sections 19.4 and 20.1)