


Early Learning Coalition of Florida's Heartland, Inc.

Attachment 1.1.11

Subject: Records Management		Policy/Procedure # FM-7	
Page: 1 of 2		Adoption Date: 8.22.07	Revision Date:
Approved by: ELCFH Board		Title: Andrew Bible, Chair	
Distribution: Upper Administrative staff; Finance staff		Authority References: Executive Director, Finance Officer	

Policy

- The Coalition must comply with the confidentiality provisions and the record retention requirements of Sections 119.021 and 411.011, and 1002.72, Florida Statutes, where applicable. The Coalition shall abide by data security measures imposed as necessary or applicable to comply with the Health Insurance Portability and Accountability Act (HIPAA).
- All Coalition records, classified as public records, must be open and available for inspection by any person. It is the responsibility of the Coalition to maintain records in a location that is accessible to the public.
- The individual records of children enrolled in School Readiness programs provided under section 411.01, Florida Statutes, when held in the possession of the Coalition, are confidential and exempt from the provisions of Section 119.07, Florida Statutes.
- Records of children enrolled in the VPK program provided under Section 1002.53, Florida Statutes and any personal information contained in those records, are confidential and exempt from Section 119.07, Florida Statutes and Section 24(a), Art. I of the State Constitution.
- The Coalition shall establish and maintain books, records, and documents, including storage media and electronic records, in accordance with generally accepted accounting procedures and practices. They will be in a manner that sufficiently and properly reflects all revenues and expenditures of funds.
- Pursuant to Chapter 119, Florida Statutes and applicable OMB Circulars, the Coalition shall retain all client records, financial records, supporting documents, statistical records, and any other documents (including electronic storage media) pertinent to the SR and VPK programs for a period of five years. Once expired, all confidential documentation will be destroyed by shredding. If an audit has been initiated and audit findings have not been resolved at the end of five years, the records shall be retained until resolution of the audit findings or completion of litigation, whichever occurs last.

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- SR and VPK are separate programs, and expenditures must be accounted for separately. The Coalition must ensure that accounting records reflect the separation of all programs they administer, or for which they receive funding. Records shall adequately identify the source and the application of funds for each program. A clear audit trail shall exist showing the benefit received from each expenditure as it relates to the applicable program.
- The Coalition must ensure that each agency receiving SR and VPK funds protect the data in a manner that does not permit the personal identification of children and their parents by persons other than those authorized to receive the records.