



21st CCLC COVID-19 Addendum to the Guidance Handbook (2020-2021)

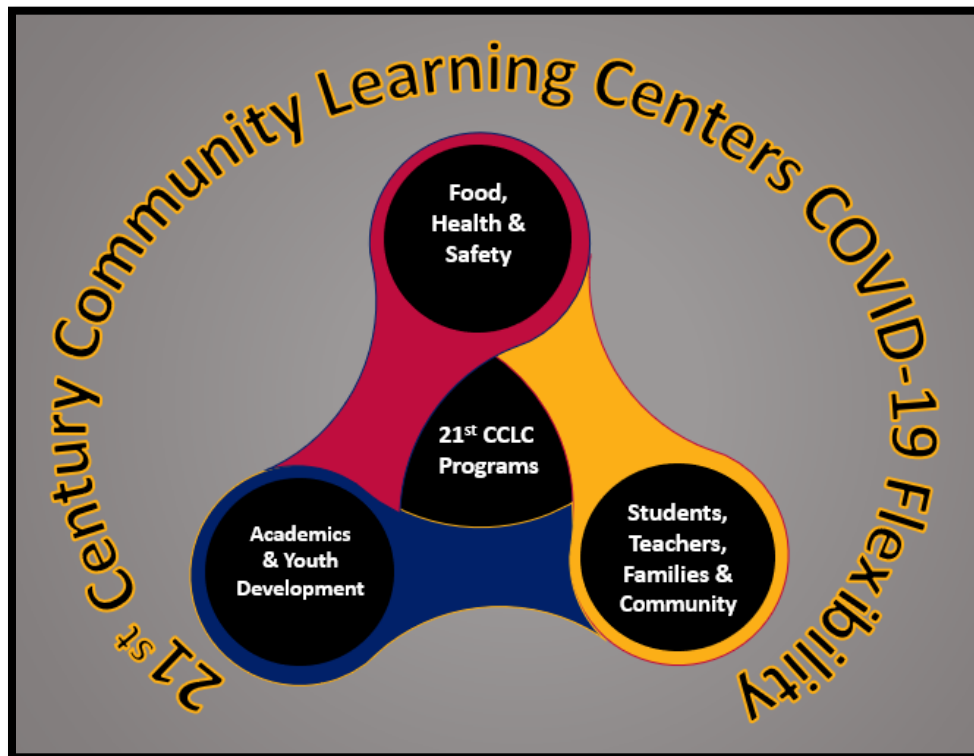
Purpose

This document contains guidance specifically related to the functioning and operation of Nita M. Lowey 21st Century Community Learning Centers (21st CCLC) Title IV-B grant programs in response to COVID-19. As this is a rapidly changing situation, please continue to obtain guidance from the following:

- 21st CCLC website at <https://www.azed.gov/21stcclc/2020/03/12/corona-virus-covid-19-and-21st-cclc/>
- Arizona Department of Education Covid-19: Guidance and Suggestions website at <https://www.azed.gov/communications/2020/03/10/guidance-to-schools-on-covid-19/>, and
- Your own district and site leadership.

Policy Guidance

The 21st CCLC programs are intended to provide out-of-school time activities to reinforce and complement the regular academic programs of the schools attended by the students served. The Arizona Department of Education (ADE) acknowledges that 21stCCLC programs are operating in a rapidly changing environment under unprecedented circumstances. This addendum to the 21st CCLC Guidance Handbook (FY21 edition) is intended to provide clarity on questions and concerns submitted to ADE regarding the 21st CCLC program, during the COVID-19 public health emergency. This addendum supersedes any previous FY20 COVID-19 flexibility guidance.



2020-2021 Flexibility Guidance

The flexibilities listed in this addendum apply to all Year 1 – Year 5 & Year 5C sub-grantees.

Compliance Expectations

Q: Will local education agencies (LEAs) need approval from the Arizona Department of Education (ADE) to start COVID-19 alternative learning for 21st CCLC programs?

- **A:** Yes. Sites will submit the **21st CCLC Defined Program Plan (2020-2021)** to the assigned ADE 21st CCLC Program Specialist on or before **September 4th** and prior to beginning 21st CCLC services to students. This is the LEA's and school site leader's assurance that the federal requirement that 21st CCLC student services will be met and provided outside of regular school hours.
 - The *21st CCLC Defined Program Plan (2020-2021)* is attached to this email- Subject: *21st CCLC COVID-19 Flexibility Guidance **Action Required*** and on the 21st CCLC website at <https://www.azed.gov/21stcclc/2020/03/12/corona-virus-covid-19-and-21st-cclc/>

Tips to keep in mind: 21st CCLC grantees may use virtual platform(s) that best meet their students' needs. In selecting tools to deliver services, grantees must ensure the privacy and security of student data, while abiding by the [Family Education Rights and Privacy Act](#) (FERPA).

When planning for and developing alternative/distance learning opportunities, equity and the need to support targeted students to engage in meaningful and productive learning needs to be considered.

While use of technology is one means of connecting with students, grantees should also plan ways to support students who may not have access to technology so they may continue to remain engaged offline.

Q: Will grantees be required to meet grant requirements related to program attendees, participation and program hours of operation?

A: Yes. Standard grant requirements remain in place unless flexibility is communicated and approved by your assigned ADE 21st CCLC Education Program Specialist. Please reference expectations and allowable flexibility accommodations in the following documents:

- **Standard 21st CCLC grant requirements** are found in the 21st CCLC Guidance Handbook (2020-2021) Edition posted on the website: <https://www.azed.gov/21stcclc/federal-and-state-regulations/> for all federal and state regulations.
 - For your convenience, page numbers are provided for the Standard Requirements mentioned below from the 21st CCLC Guidance Handbook.
- **Flexibility to the 21st CCLC grant requirements** are found in this COVID-19 addendum to the Handbook which is attached to this email- Subject: *21st CCLC COVID-19 Flexibility Guidance **Action Required*** and on the 21st CCLC website at <https://www.azed.gov/21stcclc/2020/03/12/corona-virus-covid-19-and-21st-cclc/>

Standard Requirements Flexibility

Grant Accountability

Standard Requirement (page 7): All sites are required to meet the service requirement to students as outlined in the awarded grant. This service requirement is the projected number of regular attendees.

Flexibility: For the 2020-2021 program year, all sites must meet 70% of the projected regular attendees as stated in the original approved application to maintain Substantial Compliance.

Standard Requirement (page 7): Student/Teacher ratio: Academic - 10 enrolled students (and no less than 6 students attending) each class/activity per 1 teacher. Summer – 15 enrolled students to 1 teacher.

Flexibility: For the 2020-2021 program year, the student/teacher ratio is a recommendation versus a requirement for the 2020-2021 year. Sites should monitor class attendance to ensure that participation supports meeting the service requirement listed above.

Standard Requirement for Program Design (page 7): If services are provided in a location other than the school, the location will be at least as available and accessible to the students to be served as if the program were located in the school.

Flexibility: For the 2020-2021 program year, 21st CCLC learning programs impacting students' academic and youth development needs may be offered online, by telephone, through pick up or home delivery of program materials, or other creative approaches. 21st CCLC alternative/distance learning programming should continue to **align** with and support the distance learning, safety, and other plans of the regular school day programs.

Safe & Accessible Learning Environment

Standard Requirement (page 11): At a minimum, Arizona's 21st CCLC programs provide after school snack and summer meals. Sites are also highly encouraged to offer free breakfast and evening meals as part of their program *when possible*.

Flexibility: 21st CCLC grantees must continue to provide afterschool snacks and summer meals. See the *21st CCLC Snacks & Meals COVID-19 Guidance* document attached to this email- Subject: *21st CCLC COVID-19 Flexibility Guidance **Action Required*** and on the 21st CCLC website at <https://www.azed.gov/21stcclc/2020/03/12/corona-virus-covid-19-and-21st-cclc/>

Standard Requirement (page 11): Transportation cost billed to the 21st CCLC grant (when deemed necessary) should not exceed 4% of the annual budget.

Flexibility: Grantees may use 21st CCLC transportation funds to distribute snacks, meals and educational materials to students' homes. During the COVID-19 pandemic, it may be allowable to charge more than 4% of the 21st CCLC program budget towards transportation costs if these costs are over and above what is already reimbursed and being done for the normal school day.

Note: Many districts deliver 21st CCLC and other academic supplies along with meals provided for the regular school day program at designated pick up points or via home delivery by district vehicles. If this is the case, then justification would need to be provided if transportation cost were requested from the 21st CCLC grant.

Fiscal Accountability

Q: What qualifies as 21st CCLC attendance tracking under a COVID-19 alternative learning plan?

A: School districts and charter schools have flexibility to design attendance tracking procedures to connect their unique alternative/distance learning models to existing attendance systems. In designing 21st CCLC attendance tracking procedures, districts and charters should consider which activities best represent student participation and engagement in alternative/distance learning, the ability of the 21st CCLC staff to track and record this information, and the extent to which chosen activities demonstrate the appropriate amount of time in a given 21st CCLC program activity for the day.

21st CCLC Attendance tracking **may** include methods such as:

- Communication with a 21st CCLC teacher via telephone, Zoom, Microsoft Teams, Google Duo/Meet or other digital meeting software;
- Student participation in a virtual meeting or classroom session via a digital platform;
- Daily assignments completed and submitted by the student; or
- A parental attestation or documentation of dates & time spent on 21st CCLC distance learning activities assigned by the school.

21st CCLC student attendance rosters must include standard information as follows:

- Date of activity
- Time of the activity
- Name of the instructor(s)
- Names of the students in attendance
- Name of the activity so this information can align to timesheets and time and effort logs for instructor pay

Finally, daily attendance must be documented for ADE in AzEDS through the school's Student Information System (SIS).

Q: Are 21st CCLC subgrantees permitted to distribute equipment and supplies to program participants for use during alternative/distance programming?

A: 21st CCLC subgrantees may distribute 21st CCLC-funded equipment and supplies to program participants for use during 21st CCLC alternative/distance learning activities.

Subgrantees must maintain appropriate controls over any 21st CCLC equipment and supplies distributed for remote programming. When distributing equipment and supplies, subgrantees must abide by management, tracking and labeling found in the United States Department of Education Fact Sheet for Repurposing Federal Equipment and Supplies to Combat COVID-19 in order to facilitate proper return and continued benefit to the 21st CCLC program. All sites should continue to maintain a detailed list of their fixed assets that includes all equipment purchased for 21st CCLC.

*Fact Sheet * for Repurposing Federal Equipment and Supplies to Combat COVID-19:*

This document outlines temporary flexibility for repurposing existing equipment and supplies to meet the immediate needs due to the COVID-19 national pandemic.

* <https://www2.ed.gov/documents/coronavirus/covid19-repurposing-equipment-supplies.pdf>

Q: Can the 21st CCLC programs pay staff while the program/schools are offering distance learning?

A: Yes, after the ADE 21st CCLC Education Program Specialist has received and approved the *21st CCLC Defined Program Plan* form. 21st CCLC program staff may continue to be paid with 21st CCLC grant funds for work aligned to their approved program goals, including remote work. The following guidelines must apply:

- Staff who are teleworking in accordance with established written policies must maintain time and effort records to document time spent working on cost objectives related to federal grants.
- 21st CCLC grants may only be used to support activities and cost objectives related to the intent of the 21st CCLC program application at the awarded site. 21st CCLC is a site-specific grant award.
- Employee timesheets must correspond with student attendance rosters for direct instruction.
- Employees who are teleworking and who had former permanent set schedules may no longer be working those same schedules. If current work and time schedules have changed, time and effort records should indicate such changes during the distance learning time to document proper use of federal dollars.

Allowable Work Examples

- Virtual staff/student meetings (conference calls, Zoom meetings, Skype, etc.)
- Online professional development
- Instructional Curriculum Development
- Instructional Lesson Planning
- Development of virtual programming & other remote learning opportunities
- Program Management
- Program data analysis and other evaluation activities
- Wellness check-ins with students and families
- Alternative/Distance instruction
- Prepare/Distribute educational materials and snacks

Other Flexibility:

The 21st CCLC Team is committed to supporting 21st CCLC sites affected by school situations impacted by the COVID-19 public health emergency. **21st CCLC programs should follow their LEA guidance related to COVID-19 protocols.** If there are issues that may impact your ability to stay in substantial compliance with 21st CCLC grant expectations, please contact your assigned ADE 21st CCLC Education Program Specialist as soon as possible to discuss your specific situation.

Any changes to program design or expenditures must be communicated and pre-approved by the assigned ADE 21st CCLC Education Program Specialist.

ADE 21st CCLC Education Program Specialists are here to help. They are responsible for providing technical assistance, supporting 21st CCLC grant leaders to maintain compliance with state and federal requirements, and helping grant leaders develop successful program implementation strategies.



**We equip Arizona students
to realize their potential**

The Nita M. Lowey 21st Century Community Learning Centers (21st CCLC) Title IV-B program is funded by a federal grant from the U.S. Department of Education and administered by the Arizona Department of Education.

For more information visit: <http://www.azed.gov/21stcclc/>