Nita M. Lowey 21<sup>st</sup> Century Community Learning Centers

# Guidance Handbook



## Fiscal Year 2022 Edition



Arizona Department of Education Equity for all Students to achieve their full potential

This Guidance Handbook is also available electronically on the Federal & State Regulations page of the 21st CCLC website at <u>Federal & State Regulations and Guidance | Arizona Department of Education (azed.gov)</u>





Dear 21st CCLC grant program leaders,

On behalf of the Arizona Department of Education (ADE), it is my pleasure to introduce the latest edition of the Nita M. Lowey 21st Century Community Learning Centers (21st CCLC) Title IV-B Program **21st CCLC Guidance Handbook** for the 2021 – 2022 program year.

Please note that this handbook is updated annually. The latest version is always available for download on the federal and state regulations page of the ADE's 21st CCLC website. https://www.azed.gov/21stcclc/federal-and-state-regulations

The 21st CCLC Guidance Handbook is a desktop reference guide for district grant leaders, site principals and program coordinators. The ADE 21st CCLC team has prepared this handbook to clarify the following:

- □ Programmatic and fiscal compliance expectations
- □ Program implementation guidance
- □ Required reporting
- □ Program compliance monitoring
- □ Risk levels & consequences
- □ Technical assistance & professional development
- □ Obligations on closing out the grant

## The ADE 21st CCLC team is here to help.

In addition to the 21st CCLC Guidance Handbook, the following resources are particularly recommended to help deliver successful 21st CCLC programs:

- □ The ADE 21st CCLC website <u>https://www.azed.gov/21stcclc</u>
- □ Your assigned ADE 21st CCLC program specialist

Thank you for all you do for Arizona's students, their families and your school community.

Sincerely,

Evilsison

Catherine Land Evilsizor (she/her/hers) Deputy Associate Superintendent, 21st CCLC State Director



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We equip Arizona students to realize their potential.



## PURPOSE OF THIS HANDBOOK

With the distribution and public posting of this document, the Arizona Department of Education (ADE) aims to provide guidance on compliance with the numerous statutory and regulatory requirements of the Nita M. Lowey 21<sup>st</sup> Century Community Learning Centers Title IV-B (21<sup>st</sup> CCLC) Grant for fiscal year 2021. The 21<sup>st</sup> CCLC Guidance Handbook (2020-2021) edition is a good reference for practices and standard expectations for all Arizona 21<sup>st</sup> CCLC grant programs. This guide should be read in along with the authorized statutes and applicable regulations that are relevant to the 21<sup>st</sup> CCLC Grant.

## WHAT IS THE PURPOSE OF THE FUNDING?

- The purpose of the Nita M. Lowey 21<sup>st</sup> Century Community Learning Centers Title IV-B (21<sup>st</sup> CCLC) program is to establish or expand a broad array of services in *community learning centers* for students during non-school hours or periods when school is not in session.
- Centers may offer services for students only during non-school hours or periods when school is not in session (after school, before school, evenings, weekends, summer or other school vacation periods). Adult Family Engagement services may occur at any time
- Centers must offer adult family members of 21<sup>st</sup> CCLC students opportunities for active and meaningful engagement in their children's education, including opportunities for literacy and related educational development to enhance student learning.
- All 21<sup>st</sup> CCLC program services and activities must provide students who are struggling to meet academic expectations with opportunities for academic enrichment and instructional support to help them meet the challenging State academic standards in the core content areas including literacy, math and science.
- 21<sup>st</sup> CCLC programs must ensure that all services provided are designed to reinforce and complement the regular academic program of participating students and that services are in alignment with the instruction students receive during the school day.
- Programs must be continually evaluated to assess progress towards meeting their grant objectives in the areas of academics, youth development and family engagement.
- Requiring funds to supplement and not supplant.
- Ensure a safe and easily accessible learning environment, transportation, nutritious afterschool snacks and summer meals will be provided to students.
- The ADE does not allow generation of 21<sup>st</sup> CCLC program income. This includes any program income, including fees for student participation. Any program income generated using 21<sup>st</sup> CCLC resources and placed into a site's 21<sup>st</sup> CCLC account will be deducted from the grant award for that site per federal law.





## **GRANT ACCOUNTABILITY**

It is advised that Arizona's 21<sup>st</sup> CCLC grant funding recipients (grantees) become very familiar with the monitoring resources and guidance in this 21<sup>st</sup> CCLC Guidance Handbook (2020-2021) *edition.* Some of the key resources important to 21<sup>st</sup> CCLC program administration are listed below and online at the ADE 21<sup>st</sup> CCLC website.

*Note:* The most current version of the *Nita M. Lowey 21<sup>st</sup> Century Community Learning Centers Title IV-B (21<sup>st</sup> CCLC) Guidance Handbook* is always available online at the 21<sup>st</sup> CCLC website at the top of the Federal & State Regulations page.

The 21<sup>st</sup> CCLC unit staff is committed to offering comprehensive service to grantees regarding the implementation of their grant. Each grantee is assigned to an ADE 21<sup>st</sup> CCLC Education Program Specialist for the duration of the 21<sup>st</sup> CCLC Grant. This highly qualified individual has direct experience with grants management. ADE 21<sup>st</sup> CCLC Education Program Specialists offer a system of technical assistance along with our system of accountability. Ultimately it is the responsibility of the sub-grantee to assure the greatest fidelity with the management of their approved 21<sup>st</sup> CCLC Grant as outlined in the General Statement of Assurance<sup>1</sup>.

#### **COMPLIANCE RESOURCES**

- Federal Legislation, Regulations, and Guidance specific to Nita M. Lowey 21<sup>st</sup> CCLC grant funding <u>https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/21st-century-community-learning-centers/</u>
- Approved 21<sup>st</sup> CCLC Grant Application for the site and related revisions / continuing renewal applications. (Contact your ADE 21<sup>st</sup> CCLC Education Program Specialist if you do not have a copy of your own application.)
- ADE Grants Management Office Guidance and Procedures <u>http://www.azed.gov/grants-management/</u> phone (602) 542-3901 and press option 1.
- ADE 21<sup>st</sup> CCLC website <u>http://www.azed.gov/21stcclc/</u>

Note: Critical information is found on the Federal and State Regulations tabs of the website.

## CRITERIA FOR STAYING COMPLIANT

The list below includes an overview of requirements. Grant recipients are *required* to:

- Read and understand their own approved 21<sup>st</sup> CCLC grant application
- Implement what is written in the original awarded grant
- Submit and follow the ADE General Statement of Assurance<sup>1</sup>
- Follow the ADE Grant Management Business Rules
- Submit Audit Evaluation when required
- Keep proper records
- Keep relevant records organized for announced and unannounced site visits

<sup>&</sup>lt;sup>1</sup> A General Statement of Assurance (GSA) guarantees accountability to the United States and the State by recipients of Federal and State assistance grants. The LEA assures, if awarded a grant, subgrant, or contract that it will accept funds in accordance with applicable Federal and State statutes, regulations, program plans, and applications.



- Submit complete reports on or before deadlines
- Submit revision requests for any fiscal or programmatic change
- Receive approval for revisions prior to implementing any change in spending or program
- Meet the service requirement to students as outlined in the awarded grant
- Meet the service requirement to family members of participating students as outlined in the awarded grant
- Meet the service hours requirements (academic/summer program)
- Meet the service days requirements (academic/summer program)
- Provide food for students in the program: At a minimum, afterschool snacks and summer meals
- Make progress towards the objectives outlined in the awarded grant
- Provide intentional program planning through lesson plans and/or syllabi
- Student/Teacher ratio:
  - Academic 10 enrolled students (6 actual students) to 1 teacher
  - Summer 15 enrolled students to 1 teacher
- School leaders must notify ADE 21<sup>st</sup> CCLC of new 21<sup>st</sup> CCLC Program coordinators
- No Administrator as Site Coordinator (may be allowable in summer if administrator is not on contract)
- Site Coordinator must be present during Center Hours

#### Site Compliance Tool

## **Site Compliance Tool- Outline of Sections**

#### 1. Direct Student Services

- a. Program services are provided for the number of hours and days per week proposed in original approved application.
- b. Student services are provided for the number of days and to the projected number of regular student attendees as proposed in the application funding formula.
- c. Classes/Services provided support academic objectives for students.
- d. Classes/Services provided support youth development objectives for students.
- e. Services are being provided for the target population identified in the application.

#### 2. Direct Family Services

- a. Ongoing family engagement services are provided as proposed in the original application.
- b. The family engagement activities offered support academic achievement of 21<sup>st</sup> CCLC students.

#### 3. Alignment to the School Day

- a. Student data is used to make decisions regarding program implementation.
- b. Regular communication occurs between 21<sup>st</sup> CCLC staff, school administrators, and regular school day staff to assess and enhance individual student academic progress.

#### 4. Safe and Healthy Learning Environment

- a. A 21<sup>st</sup> CCLC Safety Plan is developed and implemented.
- b. Services are provided in a safe and secure location.
- c. 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.
- d. Procedures for the safe transitions, including transportation of students between school, 21<sup>st</sup> CCLC site, and home have been established.
- e. Afterschool snacks and summer meals are provided.



#### 5. Equity and Access

a. Students with disabilities have been identified and are being served.

#### 6. Evaluation

- a. Data needed to ensure compliance with all requirements are collected, compiled, and reviewed on a regular basis.
- b. Data needed to measure progress toward reaching grant program objectives are collected, compiled, analyzed, and reviewed on a regular basis.

#### 7. Dissemination

a. Methods and strategies to disseminate and share information about the program, outcomes and accomplishments to parents, staff, students, community members and other stakeholders are being implemented.

#### 8. Sustainability

- a. At least one active partnership has been established with an organization that is not the fiscal agent/district/school itself.
- **b.** At least one other federal, state, or local program is leveraged to ensure the most effective use of public resources.
- **c.** The site is actively building additional resources in support of its 21st CCLC program through showcasing the program, enlisting new partners and/or partnering with alternatively funded programs.

#### 9. Fiscal Record Keeping

- a. Expenditure reports that follow cost principles and ADE Guidelines are kept, organized, and available on request.
- b. Pre-approved purchase orders and receipts that coincide with approved budgets are tracked, organized, and available on request.
- c. Payroll records showing positions approved in approved budget are kept, organized, and available on request.
- d. Time and effort reports are completed, kept, organized, and available upon request.
- e. Capital expenditures are in accordance with approved budgets and fixed assets are tracked appropriately.

#### **10. Required Training**

- a. (NEW)21<sup>st</sup> CCLC district director, the principal, and site coordinators new to grant leadership participated in the Grant Leadership Orientation (GLO) training to understand grant requirements and regulations.
- b. (NEW and CONTINUING) Principal and site coordinator(s) attended 21<sup>st</sup> CCLC annual conference to support the success and best practices of the 21<sup>st</sup> CCLC program. Any exceptions to this requirement must be approved in writing by ADE 21<sup>st</sup> CCLC program specialist assigned to the grantee.

#### **11. Classroom Observation**

#### **12. Maintaining Substantial Compliance**

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## **COMPLIANCE MONITORING**

Monitoring may be conducted via desktop and/or on-site visits.

#### **DESKTOP MONITORING**

ADE 21<sup>st</sup> CCLC Education Program Specialists conduct routine desktop monitoring throughout the duration of the grant period. The following lists contain the most commonly reviewed documentation.

- **1.** ADE 21<sup>st</sup> CCLC Education Program Specialists may request the following documents from the grantee at any time during the grant project:
  - Program At-A-Glance
  - Program Schedule
    - ✓ Must include current schedule of student and family engagement activities/classes, time of classes and days of the week
  - Expenditure documentation
  - Daily Class/Activity Attendance Form for each class
  - Student 21<sup>st</sup> CCLC Registration/Permission Form
  - Lesson Plan, Curriculum Overview and/or Syllabi
- **2.** ADE 21<sup>st</sup> CCLC Education Program Specialists also review the following supporting documentation for evidence of compliance:
  - Original Awarded 21<sup>st</sup> CCLC Application
  - Annual Continuing (Renewal) Application
  - ADE Grants Management System (GME)
  - Annual Performance Report (APR)
  - After School Safety Plan

- Site Evaluation Report
- Student Attendance Reporting (AzEDS)
- Summary of Classes Report
- Site Visit Notes
- Written Communication
- 21<sup>st</sup> CCLC Leadership Professional Development documentation

## SITE VISIT MONITORING

The main purpose of an on-site visit is to ensure capacity of the site to manage the 21<sup>st</sup> CCLC grant with fidelity and to comply with state and federal guidance and regulations. Site visits from the ADE 21<sup>st</sup> CCLC Education Program Specialist accomplish compliance monitoring and enable the ADE 21<sup>st</sup> CCLC Education Program Specialist to offer technical assistance and resources to help program leaders strengthen their programs.

During a site visit, the ADE 21<sup>st</sup> CCLC Education Program Specialist will follow up on any questions or potential concerns identified during desktop monitoring and completes an assessment of any items that were not previously addressed. The visit includes a conference with the principal and site coordinators, a review of program and fiscal documentation and observation of program activities being offered.

Site visits may occur as an announced visit or as an unannounced visit. Grantees should be prepared for both. Site visits will be conducted in each of the following cases:



- New (year 1) 21<sup>st</sup> CCLC sites
- Sites that are out of compliance
- As deemed necessary by the ADE 21st CCLC Education Program Specialist
- May be contacted upon request

Following the site visit, a 21<sup>st</sup> CCLC Compliance Report is completed and sent to 21<sup>st</sup> CCLC district and site program leaders. Any follow up issues are noted in the report. The person(s) responsible for addressing issues is identified, and how the ADE will determine achievement of compliance is also noted. Upon satisfactory resolution of any issues discovered on the site visit, a revised report will be sent to the 21<sup>st</sup> CCLC district and site program leaders.

#### **Fiscal Records Binder**

Grantees should have the following documents organized into a binder for each year of the program and available for the **SITE VISIT:** 

- 21<sup>st</sup> CCLC Program At-A-Glance Document (this can be found on our website)
- Program Schedule
- Current Student Attendance Records by Class/Activity for each day
- Lesson Plan, Curriculum Overview and/or Syllabus for each class offered
- Monthly Detailed Expenditures Spreadsheet for the previous month from District/Site Business Department
- Purchase Orders/Receipts
- Documentation that the District Human Resources hiring and volunteer screening procedures are followed, such as
  - Time Sheets, Time and Effort Logs, Daily Attendance Rosters for each Class/Activity (attached together with the Time Sheet as the cover)
  - Payroll records showing positions approved in approved budget are kept, organized and available on request.
  - Evidence that relevant Human Resources policies and procedures are followed.
- Fixed Assets (Capital Items) Log

#### **Requested Program Contacts for the Site Visit**

- 21<sup>st</sup> CCLC District Director (if applicable)
- Site Coordinator
- Site Principal

#### Suggested Program Contacts for the Site Visit

Fiscal /Budget staff Partners Parents Evaluator



#### **Healthy Food**

Arizona's 21<sup>st</sup> CCLC programs must offer snacks and meals as part of the essential supports for student learning and health.

#### SAFE & ACCESSIBLE LEARNING ENVIRONMENT

Arizona's 21<sup>st</sup> CCLC Department of Education requires sites to ensure a safe and easily accessible learning environment for students.

All of the State's awarded programs must provide for a safe and healthy learning environment by ensuring that the following components are incorporated in their applications and program implementation:

#### Accessibility

Students are served in an easily accessible learning environment.

• Students with disabilities are served with appropriate accommodations in an easily accessible environment.

#### Healthy food

At a minimum, Arizona's 21<sup>st</sup> 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.

- Arizona's 21<sup>st</sup> CCLC snacks and meals are funded by USDA child nutrition programs reimbursements through the Arizona Department of Education's Office of Health and Nutrition. 21<sup>st</sup> CCLC programs are responsible for applying for reimbursement through this program.
- All 21<sup>st</sup> CCLC sites are responsible for offering students healthy food during the program that meets the nutrition guidelines of the USDA.

#### **Transportation Guidance**

Programs must establish procedures for safe transportation of students between the 21<sup>st</sup> CCLC program school site (or an alternative program site if that is part of the program) and home. Programs must establish a plan for the transportation of grant participants that clearly demonstrates procedures as described in the Site original approved grant application.

- If program services are located in a facility other than the students' elementary school or secondary school, that part of the regular 21<sup>st</sup> CCLC program must be at least as available and accessible to the students to be served as if the program were located in the students' school.
- It is the fiduciary responsibility of the district to avoid supplanting with student transportation costs.
- Transportation cost billed to the 21<sup>st</sup> CCLC grant should not exceed 4% of the annual budget when deemed necessary.
- For any questions related to transportation, please communicate with your assigned ADE 21<sup>st</sup> CCLC Education Program Specialist.

#### Transitions



Procedures must be established for safe transition of students, whether the transition is from the regular school day program to the 21<sup>st</sup> CCLC program, or if the transition is from one program activity area to another.

#### Safe and Easily Accessible Facility

21<sup>st</sup> CCLC program sites must provide assurance that the program is taking place in a safe and easily accessible facility. There should be established procedures for tracking students during the program hours and methods for parents/guardians to reach 21<sup>st</sup> CCLC staff during program hours. The site campus should be secured to ensure safety by such means as monitored or secured entrances and exits.

Evidence may include: Safety logs/plans; reports; original awarded 21<sup>st</sup> CCLC application; attendance records; fire, evacuation and lockdown drill records; sign-in and sign-out sheets and emails.

The site administrator and site program coordinator must jointly develop a plan of action for safety and communication relevant to their student needs and community.

- An example of an acceptable 21<sup>st</sup> CCLC Program Basic Emergency Plan is found on the Federal & State Regulations page of the ADE 21<sup>st</sup> CCLC website <u>Safety and Healthy</u> <u>Environments</u> resources.
- All Sites are required to adopt and develop a 21<sup>st</sup> CCLC Program Basic Emergency Plan which must be in place prior to the start of the program in the fall.
- Visit the <u>Federal & State Regulations</u> page of the 21<sup>st</sup> CCLC website for additional information.

#### USE OF 21<sup>ST</sup> CCLC LOGO & LANGUAGE REQUIREMENT

All communication to the public about your 21<sup>st</sup> CCLC program, including media/news stories, and publications, such as parent letters, registration forms, brochures, flyers, newsletters, or any other electronic/print materials used for your 21<sup>st</sup> CCLC program, must include the Arizona 21<sup>st</sup> CCLC logo and language, found in the 21<sup>st</sup> CCLC Logo & Language Requirement drop down section of the Federal and State Regulations button on the right side of the ADE 21<sup>st</sup> CCLC website.

#### PROGRAM IMPLEMENTATION RESOURCES

- Federal Legislation, Regulations, and Guidance <u>https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/21st-century-community-learning-centers/legislation-regulations-and-guidance-21st-century-community-learning-centers/</u>
- Approved 21<sup>st</sup> CCLC Grant Application for the site and related revisions / continuing (renewal) applications https://home.azed.gov/Portal/
- The ADE 21<sup>st</sup> CCLC website at <u>http://www.azed.gov/21stcclc/</u> provides grantees with access to relevant guidance and support for grant success, highlighting the following areas of compliance and technical assistance:
  - What is 21<sup>st</sup> CCLC?
  - Program Calendars



- Federal and State Regulations
- Required Reporting
- Program Resources
- Professional Development
- FAQ's
- COVID-19 and 21<sup>st</sup> CCLC
- Title IV-A and Title IV-B Symposium
- Academics
- Youth Development
- Family Engagement
- Application Information
- 21<sup>st</sup> CCLC In Action

#### **SAMPLE FORMS**

The 21<sup>st</sup> CCLC grant focuses on assisting our Arizona grantees in building and sustaining comprehensive afterschool programs. In order to continuously provide better assistance, fiscal and programmatic grant tools have been compiled and made available on the ADE 21<sup>st</sup> CCLC website. Templates and other sample forms can be downloaded from the ADE 21<sup>st</sup> CCLC website under the relevant topic area.

Some key examples of forms are found in the following areas:

1) Federal & State Regulations [located on the right side of the 21<sup>st</sup> CCLC home page]

- 21<sup>st</sup> CCLC Logo & Language Requirements
- Payroll/Attendance/Time & Effort Logs
- Time and Effort Reporting

2) <u>Required Reporting</u> [located on the right side of the 21<sup>st</sup> CCLC home page]

3) <u>21st CCLC Program Resources</u> link [*located at the bottom of the 21st CCLC home page*] has other helpful templates of forms in the following areas:

- Annual Verification Checklist
- Communication Resources
- Staffing Resources
- Structures and Program Design



## **EMERGENCY RESPONSE**

The Arizona Department of Education (ADE), 21<sup>st</sup> CCLC Program Area may allow flexibility for grant recipients affected by the loss of operational capacity and increased costs due to an emergency or crisis at a site, state, or national level. Each emergency is different, and some guidelines may not be appropriate for certain situations. All sites are expected to do their utmost to provide for the safety of students, families and communities and use good judgment and common sense in handling emergency situations.

All 21<sup>st</sup> CCLC sites are required to develop a formal written emergency readiness plan that is specific and applicable to the program. This plan will guide you through various emergency scenarios and provide direction for program decisions. Sites will operate under that plan for temporary situations.

Flexibility guidance will be developed by the Arizona Department of Education in the event of a significant site, state, or national level emergency situation. As situations may change rapidly, flexibility may be reassessed. 21<sup>st</sup> CCLC sites will continue to obtain guidance from the following:

- Assigned ADE 21st CCLC Education Program Specialist and
- District and site leadership

The 21<sup>st</sup> CCLC Team is committed to supporting 21<sup>st</sup> CCLC sites affected by school situations impacted by any emergency. If there are issues that may impact your ability to stay in substantial compliance with 21<sup>st</sup> CCLC grant expectations, contact your assigned ADE 21<sup>st</sup> CCLC Education Program Specialist as soon as possible to discuss your specific situation.

Flexibility of standard requirements and expectations may be considered or granted in the following areas:

- Compliance Expectations
- Grant Accountability Requirements which may include:
  - Funding Formula Flexibility
  - Programming Flexibility
- Safe & Accessible Learning Environment Requirements (such as Distance Learning)
- Fiscal Accountability Requirements
- Afterschool Snack and Summer Meals Requirements
- Supply and Equipment Use Flexibility
- Any Federal or State Mandated Waivers

#### Reminders

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

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



We equip Arizona students to realize their potential.



## FISCAL ACCOUNTABILITY

21<sup>st</sup> CCLC funds must be used to carry out before and after school and summer program activities (or activities during other times when school is not in session) **as described in the approved project application.** 21<sup>st</sup> CCLC funds may only be used to pay for authorized activities to meet the needs of participating students and their families. 21<sup>st</sup> CCLC grant funds are not allowed to be carried over from one fiscal year to the next.

Grant funds must be managed according to sound financial management practices. Grant recipients need to use fiscal control and fund accounting procedures that ensure proper disbursement of and accounting for federal funds. Procedures must be sufficient to enable grantees or auditors to trace funds to a level of expenditure adequate to show that the funds were spent properly as approved by ADE to achieve the goals of the project.

Expenses must be properly classified in the grant application budget, and sufficient detail must be provided to understand how the grant recipient plans to expend funds. The narrative explaining proposed expenses should show the calculations of funds needed. These details will enable the ADE to approve planned expenditures and will allow auditors to determine if funds were expended as approved.

#### **Management of Expenditures**

Program leaders should maintain (or obtain from their finance office) a monthly spreadsheet that identifies expenditures by budget line. Information on the spreadsheet must show vendor name and/or employee name with dollar amounts expended/encumbered and reflect the current/latest balance.

The 21<sup>st</sup> CCLC Site Coordinator should review and approve expenditures prior to processing. All expenditures must be authorized by ADE in the approved application before the funds are expended. The Site Coordinator should keep track of all expenditures charged to the grant by budget line and be aware of current balances.

#### **Recommended Budgetary Guidelines**

- Administrative costs do not exceed 25% of total budget
- External evaluator/consultant costs do not exceed 5% of total budget
- Capital costs do not exceed 10% of the total budget and are necessary to proposed programs/services
- Transportation costs do not exceed 4% of total budget
- Indirect Costs charged to the grant may not exceed the negotiated restricted indirect cost rate. Indirect Costs may not be charged on capital expenditures. If Indirect Cost Rates have not been loaded into the Grants Management System, and the applicant plans to charge the grant, then applicant will write a narrative to this effect in the budget narrative description in the support services supply line (as a placeholder). The narrative should clearly indicate that this is a temporary placement of an allocation for anticipated Indirect Costs, and once the Indirect Cost Rate is approved, the applicant will revise the budget to include the final negotiated indirect costs in the Indirect Costs line of the budget.



- Field trips are allowable under certain conditions as described in the 21st CCLC Guidance Handbook
- A Capital Outlay Worksheet (COW) is required when an organization budgets in the capital codes within the Funding Application. For Districts, the codes are 6731-6739. For Charters, the code is 0190. Contact the Grants Management for technical assistance.

#### Revisions

Approved state or federally funded projects may be revised to reflect changes in program objectives, line item allocations and additional monies (subject to program regulations). Revisions must be submitted to the Arizona Department of Education via ADE Connect. Revisions can be made throughout the fiscal year. The deadline for accepting revisions is set by the program area. See the 21<sup>st</sup> CCLC Website at <u>https://www.azed.gov/21stcclc/</u> for the current revision deadline. The 21<sup>st</sup> CCLC Team highly recommends that the grantee start looking at revisions no later than the Spring of each fiscal year. Revisions can be fiscal or programmatic in nature, or a combination of both.

#### Two Types of Revisions

- 1. Fiscal
  - Move funds because of a late start to the 21<sup>st</sup> CCLC program (unused salaries and associated benefits)
  - Move funds to salary/benefits to start up a new mid-year class
  - Move funds to purchase capital items for a 21<sup>st</sup> CCLC approved class
  - Move funds to order more supplies for the 21<sup>st</sup> CCLC summer school program
  - Move funds to hire a retired teacher or other contractor to provide instructional services
  - Move leftover academic year funds into 21<sup>st</sup> CCLC summer school programs
  - Move funds to a line item to balance the budget line for each of the function/object codes
  - Change the details of a budgeted capital item or item description, even if the line item amount is unchanged
- 2. Programmatic
  - Replace the assessment tool listed in the original grant application because a different assessment is now being used
  - Modify project intent, focus, goal(s) or objective(s). Any modifications must still be within the 21<sup>st</sup> CCLC grant's overall purpose and have the pre-approval of the assigned Education Program Specialist

#### **Tips for Successful Revisions**

- Communicate with the assigned Education Program Specialist. He/she will be able to determine the allowability of the revision and will provide tips for a successful revision
- Communicate with the organization's business office to find out where funds should be placed in the various budget codes



- Communicate clearly in the narrative descriptions in the ADE Connects System. Grantees must provide a trail of where the funds came from and where the funds are going to in the revision
- Begin the revision with the revision date in the narrative description so it makes it easier to locate the most recent revisions during the review process. (Example: "Revision #1 10/01/21...")
- The revision language provided in the narrative description section should include whether the site is increasing or decreasing that budget line and by how much. Grantees must provide a brief description of the increase and decrease
- Submit all fiscal revisions PRIOR to incurring expenses to avoid an audit finding. Failure to maintain alignment with expenditures and the budget in the Grants Management System can result in the questionable costs needing to be paid back to the Federal Grant

#### EXPENSE CLASSIFICATION/CODING

Before submitting 21<sup>st</sup> CCLC applications or budget revisions, ALWAYS contact the organization Business Manager for guidance. It is important to consult on all fiscal matters with the finance officers prior to any budget submission, as they will be familiar with the correct classification of budget items within the coding system for education. This will help ensure that the accounting system for grant expenditures will pass future audits.

*Additional reference*: The Chart of Accounts at the Arizona Auditor General site provides the most up to date guidance on budget classification.

- 1) <u>Arizona School Districts</u> or <u>https://www.azauditor.gov/reports-publications/school-districts/manuals-memorandums</u> or
- 2) <u>Arizona Charter Schools</u> or <u>https://www.azauditor.gov/reports-publications/charter-schools/manuals-memorandums</u>

#### EXPENDITURE ALLOCATION BY SCHOOL SITE

Where a fiscal agent has more than one 21<sup>st</sup> CCLC grant award, expenditures must be allocated and accounted for separately by individual school site grant awards. Funds may not be commingled among grants by the fiscal agent, even when more than one grant is awarded to the fiscal agent in a given year.

#### **Expenditures – Allowable Costs**

Determining if an expenditure is allowable... As a basic guideline, grant program leaders should ask, "Is the expenditure...?"

- Necessary for the performance or administration of the project
- Allocable to a particular cost objective
- Legal & authorized (or not prohibited) under state or local laws
- Consistent with uniform policies of other federal & non-federal activities
- Consistent with generally accepted accounting principles
- Adequately documented
- Reasonable (does not exceed that which would be incurred by a prudent person)



E.g. A prudent person would discontinue a class or activity as soon as it becomes apparent that student attendance has declined and no longer justifies the expense, or if it is not supporting approved grant objective(s). If a class attendance stays below 6 students for more than 6 consecutive days, then the class must be canceled and the students should be moved to other  $21^{st}$  CCLC classes.

#### **Expenditures – Unallowable Costs**

Here are some examples of unallowable expenditures. This is not a comprehensive list. Contact the assigned Education Program Specialist to confirm if a particular cost is allowable:

- District level expenses: not directly or clearly related to the program
- Entertainment: including field trips to places where the purpose of the trip is to reward students or provide amusement, social activities, or entertainment. Any field trip must have pre-approval from the assigned Education Program Specialist
- Food (exception supplies for an ADE approved 21<sup>st</sup> CCLC cooking class minimal cost)
- Incentives for students (plaques, t-shirts, trophies, etc.)
- Promotional or marketing items (flags, banners, t-shirts, etc.)
- Decorative items
- Purchases of facilities or vehicles
- Capital improvements (permanent fixtures or renovations)
- Lobbying
- Travel expenses for individuals not involved with the project
- Out of State Student Travel
- Bonuses or incentives for Teachers

#### Generation of 21<sup>st</sup> CCLC Program Income IS NOT ALLOWABLE

- Generation of 21<sup>st</sup> CCLC program income is **NOT** allowed by ADE. This includes any program income, including charging fees for student participation.
  - ✓ Participant fees can result in exclusion. Even if scholarships are offered, or the fees seem nominal to program staff or leaders, some students or their families may not even apply to participate if they see or become aware of a fee for the program. As there is no way to prove that this type of exclusion is not happening, and it is the intent of the law to ensure that exclusion does not occur, ADE does **NOT** allow 21<sup>st</sup> CCLC participant fees.
  - ✓ Program income is defined as income generated using 21<sup>st</sup> CCLC resources which also includes program income from fundraising.

#### **COMMON AUDIT FINDINGS**

Audit findings due to non-compliance could result in "paying back" grant expenditures with M&O monies, suspension, and/or termination of the grant. It can also result in losing future grants or even going to jail for fraud/illegal activities.



Our auditors have informed us that two of the most common areas of audit findings are with *Time & Effort* and *Fixed Assets* documentation. Key Guidance on correctly documenting time and effort and fixed assets is provided below.

#### 21<sup>st</sup> CCLC Time & Effort Reporting

The Federal Government requires any employee, funded by federal grants, must maintain documentation showing that their time is allocable to a federal program. 2CFR200.403(a). That documentation must be based on records accurately reflect that work performed. 2CFR200.430(i)

# 21<sup>st</sup> CCLC Time & Efforts Reporting

Your ADE Education Program Specialist (or fiscal auditor) will review your fiscal management of paying staff by selecting random timesheets and looking for "proof" that staff were paid correctly.

Time Sheet	Time & Effort	Student Attendance Roster
Submitted by employee to be paid for their work. If the time sheet is submitted after the work is completed and then the employee is paid the time sheet may be accepted as Time & Effort documentation.	Submitted by employee after work is completed to certify that these funds were used to do the work the employee was paid to do.	Each class/activity/offering taught by an employee should have attendance from that class attached to the time sheet and Time & Effort log as "proof" that the employee did the work they claimed pay for.

All 3 types of documentation should be attached together with the TIME sheet as the "cover" for each employee.

- The employee's time must be documented in writing.
- The documentation should reflect the actual time spent by the employee on activities of the federal program(s) being charged.
- Employees paid by stipend must attach back-up documentation which shows dates, actual hours worked, and services performed during the time period for which they are requesting payment. Stipend pay is not a recommended practice with the 21<sup>st</sup> CCLC Grant.
- Using the timesheet as the cover page, attach the corresponding copies of Time and Effort logs and student attendance rosters by class, for <u>each</u> 21<sup>st</sup> CCLC employee.
- Student attendance rosters must include: Class Name, Teacher/Activity Leader Name, Student Name and Dates of Class (month/day/year). Note substitute staff person's name on the roster if there was one.
- Refer to the district auditor for additional guidance on Time and Effort reporting.

For further guidance on Time and Effort, the ADE Grants Management page has a Guide to Time & Effort Reporting at <u>https://home.azed.gov/Portal/</u>

- ✓ Click on "Grants Management Resource Library"
- ✓ Click on "GME User Resources/Training"
- ✓ Click on "Fiscal Monitoring"
- ✓ Lastly, click on "Guide to Time and Effort Reporting"



#### Fixed Assets

An item should be coded as equipment if it is included in the examples listed on the *Capital Outlay Worksheet (C.O.W.)* in the Grants Management System or if it meets all three equipment criteria listed below:

- 1. Typically has a useful life of at least 1 year
- 2. Typically repaired rather than replaced when worn or damaged
- 3. "An independent unit that retains its original shape, appearance, and character with use and does not lose its identity through fabrication or incorporation into different or more complex substances"

All 3 tests must apply for districts to use the Capital Outlay codes in the Grants Management System. The Capital Outlay Codes are: 6731-6739

Disclaimer for Charter Schools: Charters will use 6600 or 0190 depending on the unit cost. Contact the business office for additional guidance.

To avoid supplanting, fixed assets purchased with 21<sup>st</sup> CCLC funds may only be used outside of the regular school day, unless the assets are purchased on a cost shared basis proportional to the amount of use during whole day. Each program site must tag items purchased from 21<sup>st</sup> CCLC funding as "21<sup>st</sup> CCLC program property", and must keep a Fixed Assets Log meeting the following guidelines:

- Each 21<sup>st</sup> CCLC site must prepare a detailed listing of these fixed assets that includes all equipment purchased for 21<sup>st</sup> CCLC use such as computers, printers, and similar items that pass all 3 tests mentioned above
- The Fixed Assets Log should include the date logged, date purchased, item name/description, cost, property identification tag, and location (see the example below)
- Fixed Assets Logs are kept for 21<sup>st</sup> CCLC fixed assets until the end of the grant, at which time the items may be used to continue to support activities at the school site for which the funding was awarded

Note: The purpose of a Fixed Assets Log is to track the location and use of equipment used in the 21<sup>st</sup> CCLC Program. The Capital Outlay Worksheet (C.O.W.) is required when a District budgets in the capital codes within the Funding Application in the Grants Management System.

The following is an example of a Fixed Asset Log which may be used in 21<sup>st</sup> CCLC programs.



21<sup>st</sup> CCLC Fixed Assets Log – For items lasting more than 1 year (or at the expenditure level which your district considers items to be fixed assets and including such items as computers and printers)

Date	Date of	Item	0	Property	Storage/Use
Logged	Purchase	Name/Description*	Cost	ID Tag #	Location
				See below	English/Yearbook
Example:		Item name (Brand name		Item #001	room locked
11/18/21	11/8/21	and model)	\$731.00	(2021)	supply storage
		Add additional rows as needed			

\*Note: Each item must be logged separately.

**Property Tag Example:** 



#### GRANTS MANAGEMEN ENTERPRISE (GME) ADE CONNECT SYSTEM

Through ADE's online Grants Management system, 21<sup>st</sup> CCLC grantees will submit the following:

#### **Revisions** (both fiscal and programmatic) – ongoing

A revision is a request for a change in the original grant application. It can be for a fiscal change, a programmatic change or both. In general terms, revisions **must** honor the original integrity and intent of the awarded grant proposal. All revisions must be approved prior to any change in expenditures or program implementation. A revision can be submitted as needed.

#### **Reimbursement Requests** – monthly

The Arizona Department of Education (ADE) Grants Management staff review and approve Reimbursement Requests (RR) from fiscal agents for reimbursement of grant expenditures.

For direct assistance please contact Grants Management at 602-542-3901, Option 2 or via <u>Help Desk</u>.

Frequently Asked Questions about Reimbursement Requests

#### 1. If my reimbursement is at 10% or more of the allocation, what do I need to do?

A justification as to why the request is at 10% or more of the allocation will be required for the approval. The justification is entered in the History Log (via Create Comment page) of the request prior to the submission of it.

#### 2. If my reimbursement is at 20% or more of the allocation, what do I need to do?



In addition to the justification as to why the request is at 20% or more of the allocation (see number 1. above), an expenditure documentation will be required for the approval. Expenditure documentation needs to be uploaded in the Related Documents page in the reimbursement request. The expenditure documentation should indicate the time frame in which the expenditures occurred, the grant they were paid out of, and the types of expenditures. Examples of the expenditure documents are financial reports from accounting systems, such as Visions, QuickBooks, etc. or invoices for expenditures.

#### **Reimbursement Request Deadline**

All Reimbursement Requests must be submitted and approved PRIOR to the project end date. Reimbursement Request deadlines will be set, as applicable, based on ADE/ADOA accounting requirements for the fiscal year and/or project end dates. It is usually 5-10 business days before the end of the fiscal year.

#### **Completion Report** - yearly

The Arizona Department of Education (ADE) Grants Management staff review and approve Completion Reports (CR) from fiscal agents for reimbursement of grant expenditures as a final accounting for actual expenditures after the end of the fiscal year.

#### Things to Remember

- Completion Report submission within 60 days of the project end date is strongly recommended in order to approve and fully close-out within the 90-day liquidation period
- The 21<sup>st</sup> CCLC grant is on a July 1 June 30 fiscal year
- 21<sup>st</sup> CCLC grant funds are not allowed to be carried over from one fiscal year to the next
- Revisions cannot be initiated once the status is changed to CR Draft Started
- Reimbursement Requests cannot be submitted after the project end date; disbursement will take place on CR approval
- For direct assistance please contact Grants Management at 602-542-3901, Option 2 or via <u>Help Desk</u>.

#### Continuing (Renewal) Application - yearly

Continuing Applications are submitted for 21<sup>st</sup> CCLC programs that will be entering Year 2 and Year 3 of their grant. Renewal applications may be submitted in Year 4 and Year 5 of the grant if the applicant maintained substantial compliance in the previous award years. (See Substantial Compliance under the Maintaining Compliance section for further explanation). Grantees submit a projected budget for the next fiscal year. Renewal of 21<sup>st</sup> CCLC funding each year of the grant is contingent on maintaining substantial compliance with all requirements of the grant. The Word version of the 21<sup>st</sup> Century Community Learning Centers Continuing/ Renewal Application and guidance will be available in the Required Reporting section of the 21<sup>st</sup> CCLC website in the beginning of February and will be available for submission online in the ADE Connect system on March 1, each year. Application guidance will also be available at that time. Contact the assigned Education Program Specialist for technical assistance.



#### FISCAL ACCOUNTABILITY RESOURCES

• Federal Legislation, Regulations, and Guidance <u>https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/21st-century-community-learning-centers/legislation-regulations-and-guidance-21st-century-community-learning-centers/</u>

This page includes the following:

- Elementary and Secondary Education Act, as amended, Title IV, Part B
- Regulations
- Uniform Grant Guidance: Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards
- Non-Regulatory Guidance (Applies to awards made **prior** to 12/26/2016)
- Arizona Auditor General Manuals/Memorandums-School Districts for correct expense classification/coding

https://www.azauditor.gov/reports-publications/school-districts/manuals-memorandums

Arizona Auditor General Manuals/Memorandums-Charter Schools for correct expense classification/coding

https://www.azauditor.gov/reports-publications/charter-schools/manuals-memorandums

- Grants Management System Public Access <u>https://gme.azed.gov</u> for a quick reference guides, all APPROVED Funding Applications, Reimbursement Requests, Completion Reports (including all History Log comments) and all other publicly accessible information
- ADE 21<sup>st</sup> CCLC website with Federal and State Regulations and Guidance https://www.azed.gov/21stcclc/federal-and-state-regulations



Frameworks



## **21ST CCLC FRAMEWORKS**

#### ACADEMICS

ESSA, the authorizing statute, provides *Measures of Effectiveness* to guide 21<sup>st</sup> CCLC grantees in identifying and implementing programs and activities that can directly enhance student learning. (The *Measures of Effectiveness* can be found on the <u>ADE 21<sup>st</sup> CCLC website</u> at <u>http://www.azed.gov/21stcclc/</u> in the Application Resources section under "Grant Application Recommended Resources.")

Arizona's 21<sup>st</sup> CCLC grantees must provide academic enrichment activities to students in highpoverty schools to help them meet State and local standards in the core content areas of reading/literacy and math. Arizona's 21<sup>st</sup> CCLC programs also provide Science, Technology, Engineering and Math (STEM) opportunities for their students. These activities must

- Address the needs of the schools and communities
- Be continuously evaluated using performance measures
- When appropriate be implemented using evidence-based research
- Complement the students' regular academic program
- Focus services on academic enrichment opportunities for students and families

Arizona's 21<sup>st</sup> CCLC grant applications are strategically written to contain objectives related to student's academic needs. The State requires its 21<sup>st</sup> CCLC sub-grantees to monitor and report on grant outcome objectives that are SMART - Specific, Measurable, Attainable, Realistic and Time Bound (showing growth annually within the program year).

Areas measured by grant outcome objectives should include 1) Academic- Math, reading, language arts, and literacy measured through benchmark/formative testing, 2) Youth Development and 3) Family Engagement designed to support growth in adult family members' understanding/ knowledge of how to help their child succeed.

Arizona's grantees must report on grant objectives for student participants' movement in at least two academic improvement indicators.

- One objective must be math related
- One objective must be reading/literacy related
- If a third objective is submitted, it can be math, reading, or another academic area

Activities must support achievement of these grant specific objectives, and support students that are struggling to meet the challenging state academic standards in core content areas, utilizing evidence-based research to develop and implement activities and curriculum.

#### **Summer Programs**

All Arizona 21<sup>st</sup> CCLC programs must offer summer programs as indicated in the direct student services operational requirements of the 21<sup>st</sup> CCLC grant application.



#### Successful academic programs:

- ✓ Are based on the needs of the students through assessments, surveys, teacher/family input
- ✓ Use an evidence-based curriculum
- ✓ Include students/families/school day staff in the planning process
- $\checkmark$  Work with school day goals to continue intentional learning
- ✓ Provide hands-on engaging learning opportunities
- ✓ Incorporate Project-Based Learning, small group settings, and youth voice
- ✓ Include a calendar in advance for students/families to prepare for services/opportunities (when possible)
- ✓ Ensure that the program structure promotes time on task, and uses strategies to encourage attendance (including in-person, phone calls, letters, student made invitations, etc.)

Also see the Academics page of the 21<sup>st</sup> CCLC website at <u>http://www.azed.gov/21stcclc/academics/</u>

#### YOUTH DEVELOPMENT

The State requires its 21<sup>st</sup> CCLC sub-grantees to monitor and report on grant outcome objectives that are SMART - Specific, Measurable, Attainable, Realistic and Time Bound (showing growth annually within the program year). Arizona's grantees must report on grant objectives for student participants' movement in at least one youth development indicator. Support for youth development should be incorporated into all student classes and activities. Additionally, some activities may be designed specifically to support youth development and leadership.

Also see the Youth Development page of the 21<sup>st</sup> CCLC website at <u>http://www.azed.gov/21stcclc/youth-development/</u>

#### FAMILY ENGAGEMENT

In Arizona, family engagement is rapidly shifting from random family involvement activities to an integral part of education reform efforts with meaningful engagement partnership practices that include trusting relationships and **ONGOING** opportunities that are linked to learning. Arizona's 21st CCLC grant applications are strategically written to contain objectives related to student and family needs. Grantee Family Engagement Plan is outlined in the approved original application. As grantees create an implementation plan, include the Key Components for Building Capacity:

#### **System Vision**

- Systemic: Family-school partnerships are essential supported across the organization.
- **Integrated:** Capacity building is integrated into all aspects of site's improvement strategy.
- **Sustained:** School leaders are committed to, and have a systemic vison of, family-school partnerships that are supported with resources and infrastructure.



#### **Essential Conditions and Opportunities**

- Trusting Relationships: School-home relationships promote empathy and resect
- Welcoming and Affirming Environments that are Culturally Responsive: All families are welcome in safe and healthy environments where learning is grounded in a cultural view where multiple expressions of diversity are recognized and regarded as assets for teaching and learning.
- **Two-way Communication:** Comprehensive home-school communication plan where sites are not talking TO families but doing work WITH families.
- Linked to Learning: Intentionally involve families in systemic academic improvement activities.

#### Families Engaged in Diverse Role

- Social Capital: Families act, lead and become advocates and leaders themselves.
- **Self-Efficacy:** Families have a sense of comfort and confidence to encourage student success.
- Shared Values and Principles: Families are essential assets, equitable partners, and informed decision makers.
- Equitable Partnerships: 21<sup>st</sup> CCLC programs value and encourage-the voices, knowledge, expertise, capacity and experiences of all 21<sup>st</sup> CCLC families as stakeholders.
- Adult Education Champions: Engaged adults understand the power of human connection and insist that students have the pathways to reach their full potential.

Long gone are the days that families should be on campus to be engaged. The ADE is dedicated to strengthening the voice of families and bringing focus to meeting families where they are and planning **WITH** not for the family. 21<sup>st</sup> CCLC programs shall track participation to understand barriers, record participation, and monitor progress. Family members may include parents, grandparents, foster parents, guardians, extended family and other adults serving in a supportive role of a 21<sup>st</sup> CCLC participant.

For the complete Family Engagement Framework which includes Best Practices in Arizona and programming ideas and strategies, visit the Family Engagement page of the 21<sup>st</sup> CCLC website at <u>https://www.azed.gov/21stcclc/family-engagement</u>.

#### PARTNERSHIPS

The Arizona Department of Education 21<sup>st</sup> CCLC team is deeply committed to the power of quality after school programming for Arizona students. We encourage sites to consider additional strategies, such as involving adult family members, appropriately screened volunteers, and community organizations to help support student and family programs.

#### **Identifying Potential Partners**

A 21<sup>st</sup> CCLC partner is considered a person, place or just about anything in between. Various partnerships created provide benefits for the youth served in the site's local



community. When a site is looking to identify a partnership, there are many things to take into consideration.

- Partnerships that leverage local resources
- Asset mapping or assessing gaps that partnerships can provide for
- Provide opportunities that your community might not otherwise have be able to offer your students

#### Where can 21st CCLC programs find supporting partnerships?

- Form A the Participant's Verification Form
   Each 21<sup>st</sup> CCLC subgrantee's original application included Form A the Participant's
   Verification Form. These listed partners are a good place to begin building a community
   of support. Partners signing Form A agreed to providing 21st Century Community
   Learning Centers (CCLC) program educational and related activities that will
   complement and enhance students' academic performance and achievement.
- The ADE 21<sup>st</sup> CCLC <u>Program Resources</u> page of the website offers many suggestions for partnership opportunities, and other ways to strengthen 21<sup>st</sup> CCLC programs, in particular:
  - The Community as Partner tab contains the <u>External Organizations List</u>
  - The Organizational Resources tab contains links to many State and National resources

Note: ADE's inclusion of an organization on Arizona's eligible provider list is not an endorsement of the organization, nor is it a certification or verification of the quality of activities provided by the organization.

#### SUSTAINABLITIY

21<sup>st</sup> CCLC programs should be designed to build a sustainable model which can support continuation of programming and supports for students into the future.

The Arizona field has described sustainability as the ability to continue practices, projects or activities because structures and systems have been built during the course of the 21<sup>st</sup> CCLC program to:

- secure resources/knowledge base to continue services
- introduction of new/more effective methods of learning and instruction that are incorporated into the school day
- connect with and secure ongoing involvement of stakeholders
- create mutually beneficial relationships
- showcase quality programs and services

Sustainability can include internal and external partnerships that will collaborate to provide youth and families in their communities with opportunities beyond the duration of the 21<sup>st</sup> CCLC grant funding.



#### **Sustainability Planning:**

- Determine which program activities should continue
- Connect the operating costs of those activities to a funding strategy
- Bring together data, resources, and strategies to guide your efforts as you progress

Georgia Health Policy Center Bringing the Future into Focus, 2011



Maintaining Compliance

We equip Arizona students to realize their potential.



## MAINTAINING COMPLIANCE

The information contained in the 21<sup>st</sup> CCLC Guidance Handbook provides a useful reference for 21<sup>st</sup> CCLC grant program leaders. It may be used as an outline of requirements and information important to maintaining fiscal and programmatic compliance. Where the Handbook is not comprehensive, additional references providing guidance and regulations governing management of these federal funds are provided on the Arizona Department and Federal Department of Education's websites.

Grantees failing to stay in compliance with State and Federal guidelines and law are subject to penalties and the Arizona Department of Education reserves the right to withhold, reduce, or terminate funding awards. Any violations of proper management of the 21<sup>st</sup> CCLC Grant may require other remedies legally available to the Arizona Department of Education.

The Arizona Department of Education routinely evaluates each sub-grantee's level of compliance with Federal statutes, regulations and terms and conditions of the sub-award for purposes of determining the appropriate monitoring (2 C.F.R.&200.331(b). Risks can be both an opportunity and a threat to the grant project. The following categories have been established to identify the performance of sites:

#### FOUR RISK LEVELS



#### I. No Apparent Risk

Grantees demonstrate practices that are unlikely to result in low-quality programming or disruption of service. All grantees face multiple lower-priority issues on a regular basis, not all of which necessarily come to the attention of ADE. Site has capacity to address and solve their issues.

#### II. Low Risk/Warning

Grantees demonstrate practices that may interfere with effective administration of the grant or quality of services provided. These include areas of non-compliance with state or federal program guidelines or requirements. Low risks must be addressed; if left unaddressed, over time, are likely to become moderate to high risks. Grantees that demonstrate evidence of failing to meet any single requirement are subject to a "Warning" status. Grantees will be provided with written communication including a timeline to resolve the issue.

Site with new grantee leadership or change in conditions places a site into an automatic low risk category. The transition may warrant additional technical assistance and



required professional development. A multitude of resources and tools exist and are available to assist grantees with establishing processes to meet program requirements.

#### III. Moderate Risk/Out of Compliance

Grantees demonstrate practices a lack of capacity to manage the grant or to perform according to their contractual obligations as required in the approved grant application and the General Statement of Assurances submitted to ADE Grantees will be found "Out of Compliance."

- 1. Grantees Out of Compliance with grant requirements will receive a Corrective Action letter and/or Special Grant Award Conditions letter in ADE Grants Management. Grantees will be notified in writing of issues needing resolution. This includes how the program can demonstrate compliance, what technical assistance and resources can be offered and how ADE will monitor the issues to determine when/if they have been resolved.
- 2. A site visit will be scheduled with leadership to discuss the issues and their potential resolution.
- 3. Monitoring may be conducted in various ways depending on the progress made and the level of oversight/guidance needed. Follow-up may include the following measures:
  - Require the grantee to submit a Corrective Action Plan
  - Schedule in-person or via telephone conference
  - Require grant leaders visit another successful 21<sup>st</sup> CCLC program site
  - Monitor site continuously, which may include an audit of program and/or fiscal records depending on the identified issues
  - Scheduled meeting with District leaders or other ADE staff
  - Request additional documentation
  - Withhold funds until evidence of acceptable performance
  - Reduce funds with or without conditions
  - Require site staff to attend additional professional development as warranted by their ADE 21<sup>st</sup> CCLC Education Program Specialist

#### IV. High Risk/Out of Compliance

Grantees demonstrate practices failing to manage the grant or perform according to their contractual obligations as required in the approved grant application and General Statement of Assurances submitted to ADE by grantees will be found "High Risk/Out of Compliance." Once a grantee enters "High Risk" status, it may become necessary to hold funds until any critical issues are resolved. The ADE 21<sup>st</sup> CCLC Education Program Specialist assigned to the grantee will utilize all data available to make a decision regarding the reduction or termination of funds in accordance with the federal and state guidelines. This data includes but is not limited to: Communications with site leaders, observations documented in site visit report(s), desktop monitoring of the site's Continuing Application, Summary of Classes Report(s), Annual Performance Report (APR), fiscal reviews. Communication will be noted in ADE Grants Management.

Serious issues which may include situations that are dangerous, harmful or involve abuse of grant funds may have the grant award immediately terminated without implementing prior steps.

Grantees may decide to opt out of the funding at any time if they determine that they do not have the capacity to manage the grant program. If this is the case, the designated ADE 21<sup>st</sup> Education Program Specialist will assist with this process.

In the event of grant termination, the sub-recipient will adjust the accounts due and will undertake no additional expenditures and begin liquidation of funds and submission of its final expenditure report through ADE Grants Management.

#### SERVICES TO STUDENTS / REDUCTION OF FUNDS

Grantees must adhere to the fundamental program requirements by serving the number of "regularly attending" students (30 days or more) that are projected in the original awarded grant, and offering services for at least the number of days promised. Total budget allocation is substantially based on this projection, as the purpose of the funding is to serve students at least for the minimum number of days that usually produces a boost in academic success. *Formula: \$ per student x days of programming x number of projected regularly attending students.* 

21<sup>st</sup> CCLC guidelines (see table) require that year to year funding will be earned if service to students is in line with the proposed number of projected regularly attending students and the total number of days the center is "open" offering classes and activities. The expectation is that grantees will always serve at least the number of students and offer the number of days promised in their original awarded application. However, in recognition that programs may initially need time to implement programming and build the "Out of School time" culture to meet the numbers promised, the following minimum expectations have been established:

Year	Service to % of promised number of regular attendees as identified in the funding formula	Year	Program offered the % of promised number of days as identified in the funding formula
1	Must serve at least 75%	1	Must be offered 75%
2	Must serve at least 90%	2	Must be offered 100%
3	Must serve at least 90%	3	Must be offered 100%
4	Must serve at least 90%	4	Must be offered 100%
5	Must serve at least 90%	5	Must be offered 100%

#### SUBSTANTIAL COMPLIANCE (Maintaining Funding for the 5 year Duration)

Substantial Compliance is defined as compliance with the substantial or essential requirements of the 21<sup>st</sup> CCLC contract that satisfies its purpose or objective. Achieving Substantial Compliance means that a good faith attempt is made to perform the requirements of the agreement even if it does not precisely meet every term of the agreement.


To determine if a grantee is in Substantial Compliance with grant requirements, grantees are evaluated by using federal and state reports, the compliance monitoring tool, and other observations and data that assist with identifying the grantee's level of performance.

A grantee must meet expectations of substantial compliance to be eligible to renew funding. During the five potential years of funding the requirements for Substantial Compliance is as follows:

**Years 1-3**. If a site is found to be Out of Compliance or High Risk, the site will be provided with additional technical assistance, heavy monitoring and other requirements relevant to the site's finding(s).

• If a Year 1-3 site is Out of Compliance and does not achieve Substantial Compliance by the end of the following year (the second year in a row), this demonstrates that the site doesn't have capacity to manage the grant program, and the site may either self-terminate or not qualify for the next year's funding.

**Years 4-5**. Each grantee must have demonstrated Substantial Compliance in the preceding year to qualify for an additional Renewal year of funding. If a grantee finishes the year in an "Out of Compliance" category, the grantee will not be approved for continued funding in the Renewal Years 4 or 5 of that 5-year grant cycle.

Substantial Compliance Illustration Flow Chart on the next page.



## Substantial Compliance





#### **OBLIGATIONS ON CLOSING OUT THE GRANT**

Grantees are responsible for the closure of 21<sup>st</sup> CCLC programs at the end of their last year of grant award (usually at the end of five years). Grant leaders should be aware of the following:

**Official Records:** Federal grant programs must maintain official records for five years for possible audit purposes. Grant leaders must ensure that their district/fiscal agent assists in archiving documents properly (such as attendance, time and effort, and timesheets) because the district will provide assistance with archiving crucial program documentation according to the latest requirements. Official guidance regarding maintenance of documentation for federal grants can be found at Arizona State Library, Archives & Public Records link at www.azlibrary.gov/arm/retention-schedules.

**Program Supplies:** ADE allows the school site whose students were the recipients of the 21<sup>st</sup> CCLC program services to keep any capital items and instructional supplies that were purchased through 21<sup>st</sup> CCLC funding. The intent is to continue support of site participants.

**Required Reporting:** It is necessary to complete the last year of the site's 21<sup>st</sup> CCLC grant program with all reports submitted on time. This ensures the district/fiscal agent remains in good standing with ADE. Grantees in the last year do not complete a continuing (renewal) application. However, the following annual reports must also be submitted in the last year of the grant:

- APR
- Summary of Classes
- Site Evaluation\*
- Annual Verification Checklist
- Student Attendance Reported online in AzEDS through the school's Student Information System (SIS) for the last year of your 21<sup>st</sup> CCLC grant

The ADE 21<sup>st</sup> CCLC website <u>Required Reporting</u> page maintains ALL of the current reporting templates and guidance for your review.





## **PROFESSIONAL DEVELOPMENT**

The ADE 21<sup>st</sup> CCLC unit is dedicated to providing Professional Development (PD) opportunities to support the growth and development of successful 21<sup>st</sup> CCLC programs throughout the duration of their award.

#### ADE 21<sup>st</sup> CCLC Annual Professional Development Requirements:

- All (NEW and CONTINUING) Principal(s) and Site Coordinator(s) are required to attend the 21<sup>st</sup> CCLC Annual Symposium to support the success and best practices of the 21<sup>st</sup> CCLC program.
- 2. *Additionally*, all (**NEW**) 21<sup>st</sup> CCLC District director(s), Principal(s), and Site Coordinator(s) participate in the 21<sup>st</sup> CCLC Grant Leadership Orientation (GLO)\* training to understand grant requirements and regulations.

Exceptions to the professional development requirements stated above must be approved by the ADE 21<sup>st</sup> CCLC Education Program Specialist assigned to the grantee. Specialists may require and/or recommend that grant leaders attend additional specific PD opportunities. PD serves as an important source of technical assistance for grantees.

#### **Professional Development**

Information on current year PD will be provided by your ADE 21<sup>st</sup> CCLC Education Program Specialist. Our website shares State and National PD opportunities under the *Professional Development* tab: <u>https://www.azed.gov/21stcclc/trainings-professional-development/</u>

#### ADE 21st CCLC Annual Symposium

This annual symposium offers 21<sup>st</sup> CCLC grant leaders a full day of PD designed to inform, train, and support them in their leadership roles. Attendance is a compliance requirement for grantees.

Previous sessions have included:

- Safety Planning
- Family Engagement
- Summer Planning
- Program Sustainability
- STEM in Afterschool
- Well Rounded Education

## ADE 21st CCLC Grantee Leadership Orientation (GLO)

All (**NEW**) 21<sup>st</sup> CCLC District director(s), Principal(s), and Site Coordinator(s) participate in the GLO training to understand grant requirements and regulations. This orientation include two online training modules,\* one on Fiscal Accountability & Maintaining Compliance and another on Implementation & Reporting. Both modules must be completed for participants to receive credit.



The Grant Leadership Orientation (GLO) introduces new leaders to:

- ADE/State and Federal compliance regulations
- ADE/State provided support and compliance monitoring
- Assurances, policies, reporting, and data collection
- Budgets and Grants Management Enterprise (GME)

This training provides new 21<sup>st</sup> CCLC leaders with information necessary for successful grant implementation and effective management.

\* To find the online GLO modules, see the ADE 21st CCLC Training Modules drop down on this page <u>https://www.azed.gov/21stcclc/trainings-professional-development</u>

#### ADE 21st CCLC Networking Meetings

Networking meetings are offered throughout the year in different regional locations in Arizona. Participants have an opportunity to visit a 21<sup>st</sup> CCLC site that are on target in meeting their goals and objectives. Host site staff highlight best practices and the model of programming working at their afterschool program. These meetings provide a valuable opportunity for program staff and leaders to grow their network, facilitate connections among grantees, and widen the lens of 21<sup>st</sup> CCLC best practices.

#### ADE 21st CCLC Reporting Modules\*

This training is designed for grant leaders responsible for completing required reports for their 21<sup>st</sup> CCLC program. The modules cover the following required annual reports:

- Site Evaluation Report
- Summary of Classes Report

Attendees will leave with an understanding of reporting requirements and how to use their site data to share their program's story with stakeholders.

\* To find the online reporting modules, see the ADE 21st CCLC Training Modules drop down at <u>https://www.azed.gov/21stcclc/trainings-professional-development</u>

#### You for Youth (Y4Y)

Y4Y is the online professional learning technical assistance portal for all 21<sup>st</sup> CCLC grants provided by the U.S. Department of Education. Relevant and meaningful information for State Coordinators, Site Coordinators, and 21<sup>st</sup> CCLC Practitioners is available at <u>https://y4y.ed.gov/</u>





## **REQUIRED REPORTING**

Grantees shall prepare and submit all programmatic and fiscal reports required by the Department in a **timely and accurate** manner.

- Annual Performance Report (APR)
- Completion Report
- Continuing (Renewal) Application
- Student Attendance Reporting
- Site Evaluation Report
- Summary of Classes Report

#### Important notes:

- Always refer to the Required Reports tab of the ADE 21<sup>st</sup> CCLC website for reporting due dates, report templates, and guidance used to complete and submit the reports. <u>http://www.azed.gov/21stcclc/required-reporting/</u>
- For helpful videos on reporting, see the ADE 21st CCLC Training Modules drop down on this page <u>https://www.azed.gov/21stcclc/trainings-professional-development</u>.

#### ANNUAL PERFORMANCE REPORT (APR) – 3 times per year

The US Education Department (ED) requires all 21<sup>st</sup> CCLC grantees to enter Summer, Fall, and Spring Term data for submission to the U.S. Congress. The data collection template is provided by the ADE.

#### ADE 21st CCLC REPORTS

#### 21<sup>st</sup> CCLC Site Evaluation Report – *yearly*

The evaluation report serves as a periodic evaluation for grantees to assess their progress toward achieving their own grant objective outcomes. In addition, grantees should use their results to strengthen program or activities, to refine performance measures, and to celebrate successes achieved. Results should be made available to the public upon request.

#### 21st CCLC Student Attendance Reporting - at least weekly

21<sup>st</sup> CCLC Student level attendance is now uploaded to ADE via each site's Student Information System (SIS) into the AZEDS system. Attendance is entered in the SIS for *all students who participated at least one day in the program*. Attendance is uploaded at least once a week, but daily entry is highly preferred. Reason: Data will be used by the school's site and district administration to monitor the impact of the program on its students and by ADE for State Level Evaluation, federal reporting, and cross referencing with other reporting.

#### 21st CCLC Summary of Classes Report - 2 times per year

This spreadsheet provides ADE program staff with a snapshot of what classes are being offered and the number of students that are being served in the site's 21<sup>st</sup> CCLC program. It enables ADE staff to provide technical assistance throughout the year to grantees that may need additional guidance.



#### **GRANTS MANAGEMENT ENTERPRISE (GME) ADE Connect System**

Through this online system, 21<sup>st</sup> CCLC grantees will submit the following:

#### **Grant Application Revisions** – as needed

Revisions (both budgetary and programmatic) are allowable as needed throughout the duration of the grant. Revisions must be approved by ADE prior to any change in expenditure of funds. Revisions must honor the integrity and intent of the original awarded grant proposal. Contact your ADE 21<sup>st</sup> CCLC Education Program Specialist for additional technical assistance.

#### **Reimbursement Requests** – at least monthly

Because the  $21^{st}$  CCLC grant is awarded on a cost reimbursement basis, grantees' fiscal agents must submit Reimbursement Requests on a regular basis based on expenditures. For additional technical assistance the Grants Management Team can be reached by calling the Grants Management Hotline at: (602) 542-3901 – Option 2 for Fiscal Questions (CRs and RRs)

#### **Completion Report** – *yearly*

Fiscal offices also complete an annual Completion Report within 90 days of the project fiscal end date, showing a final accounting of actual expenditures during the fiscal year. All 21<sup>st</sup> CCLC grantees' fiscal officers are highly recommended to submit an annual Completion Report on the actual expenditures for the grant within 60 days of the project fiscal end date. 21<sup>st</sup> CCLC funds are not allowed to be carried over from one fiscal year to the next. The 21<sup>st</sup> CCLC grant is on a July 1 – June 30 fiscal year. For additional technical assistance the Grants Management Team can be reached by calling the Grants Management Hotline at: (602) 542-3901 – Option 2 for Fiscal Questions (CRs and RRs)

#### Continuing (Renewal) Application - yearly

Continuing (Renewal) Applications are submitted for 21<sup>st</sup> CCLC programs that will be entering Year 2, Year 3, Year 4, and Year 5 of their grant. The Applications include the following:

- Programs will submit the full projected budget for the next fiscal year. This may include budgetary changes but must honor the integrity and intent of the original awarded grant proposal.
- Programs must demonstrate substantial compliance in order to receive funding renewal for years 2, 3, 4, and 5.
- Minor changes in the grant program operation may be requested for approval in the Continuing (Renewal) Application. This can include programmatic changes but, again, these must honor the integrity of the original awarded grant proposal.
- Recommendation: Check with your ADE 21<sup>st</sup> CCLC Education Program Specialist prior to submitting proposed changes in grant objectives, or if you have any questions regarding the allowability of a change you would like to submit.

All submissions through ADE's Grants Management system must be made by people authorized by their entity to submit in that system. Close attention must be paid to deadlines



and guidance provided in the resources below and by the grantee's administrative and fiscal department. Also see the following *Use of Funds & Fiscal Management* section of this *Handbook*.

#### **REPORTING RESOURCES**

- Federal Legislation, Regulations, and Guidance <u>https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/21st-century-community-learning-centers/legislation-regulations-and-guidance-21st-century-community-learning-centers/</u>
- Approved 21<sup>st</sup> CCLC Grant Application for the site and related ADE approved Application Revisions / Continuing (Renewal) Applications <u>https://home.azed.gov/Portal/</u>
- ADE Grants Management Office Guidance and Procedures at <a href="http://www.azed.gov/grants-management/">http://www.azed.gov/grants-management/</a> or by phone at (602) 542-3901 or <a href="http://www.azed.gov/grants-management/">Helpdesk</a>.
- ADE 21st CCLC website Required Reports page at <u>http://www.azed.gov/21stcclc/required-reporting/</u>



We equip Arizona students to realize their potential.





## AUTHORIZING LEGISLATION

#### Authorizing Legislation Governing the 21st CCLC in the Every Student Succeeds Act

PART B— Nita M. Lowey 21<sup>st</sup> Century Learning Centers Grant https://oese.ed.gov/offices/office-of-formula-grants/school-support-andaccountability/21st-century-community-learning-centers/legislation-regulations-andguidance-21st-century-community-learning-centers/



#### ESSA Arizona State Plan, 21st CCLC

G. Title IV, Part B: 21st Century Community Learning Centers, pages 47-53 https://www.azed.gov/essa/









# **ABOUT US**

We highly encourage immediate communication with the assigned ADE 21<sup>st</sup> CCLC Education Program Specialist should a grantee require technical assistance.

## Arizona Department of Education 21st CCLC Unit

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## Kathy Hoffman Superintendent of Public Instruction



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