Nita M. Lowey 21st Century Community **Learning Centers**



Guidance Handbook



Fiscal Year 2023 edition



Arizona Department of Education

Highly Effective Schools
Nita M. Lowey
21st Century Community Learning Centers
(21st CCLC) Title IV-B Program



Dear 21st CCLC grant program leaders,

On behalf of the Arizona Department of Education (ADE), it is our 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 2022 – 2023 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 ☐ Consequences for being found out of compliance ☐ 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 https://www.azed.gov/21stcclc ☐ Your assigned ADE 21st CCLC program specialist Thank you for all you do for Arizona's students, their families and your school community. Sincerely, The ADE 21st CCLC Team

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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 21st Century Community Learning Centers Title IV-B (21st CCLC) Grant for fiscal year 2023. The 21st CCLC Guidance Handbook (2022-2023) edition is a good reference for practices and standard expectations for all Arizona 21st CCLC grant programs. This guide should be read along with the authorized statutes and applicable regulations that are relevant to the 21st CCLC Grant.

PURPOSE OF THE FUNDING

- The purpose of the Nita M. Lowey 21st Century Community Learning Centers Title IV-B (21st 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 21st 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 21st 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.
- 21st 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/social emotional learning (SEL) 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 21st CCLC program income. This includes any program income, including fees for student participation. Any program income generated using 21st CCLC resources and placed into a site's 21st CCLC account will be deducted from the grant award for that site per federal law.



FIDELITY TO APPROVED APPLICATION

Grant approved by the State Board of Education - Subgrantees receive annual written Grant Award Notification letters from regarding the State Board of Education (SBE) approved funding allocation for the 21st CCLC program for each year within the grant award period. The grant period is concurrent with the Federal fiscal year, July 1st – June 30th, unless otherwise noted and approved by the SBE.

The Grant Award Notification letters include the award amount approved for the year being funded, either the initial or current year, as well as the annual award assurances, among other things. Grant awards must be annually accepted/approved by the Subgrantee's local Board of Education or Board of Directors, whichever is applicable. Grant Award Notification letters and documented evidence of Board approval must be maintained for monitoring purposes.

Fidelity to Awarded Grant Application Components

Once approved by the SBE, the federal Education Department (ED) expects that grant recipients will operate 21st CCLC programs with fidelity to the original approved application. ADE will not permit a subgrantee to change the project's scope that was originally outlined in the application, scored by the reviewers during the application reader scoring process and awarded by the SBE without prior approval by the ADE. Proposed programmatic or budgetary changes must be submitted via a proposed revision to the application online in the ADE Grant Management system. This policy is designed to provide basic fairness to applicants for discretionary subgrants

The grant proposal your site wrote is your guide or roadmap for programming and operation. Think of it as a contract. Keep it on hand and be familiar with it. Share the grant with relevant staff, such as site coordinators, staff, and school administrators. The goals, objectives, and activities table should be understood by everyone involved in the program. Actual activities and programs must align with the proposal's objectives.

PROGRAM OPERATIONS ACCOUNTABILITY

The Arizona Department of Education 21st CCLC team is deeply committed to the power of quality Out of School Time programming for Arizona students.

Student Services

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

Arizona's 21st CCLC grant applications are strategically written to contain objectives related to addressing students' academic needs that are SMART - Specific, Measurable, Achievable, Realistic and Time Bound (showing growth annually within the program year). The state requires its 21st CCLC subgrantee to monitor and report on these grant program level outcomes each year of the grant.

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

To maximize the opportunity to impact student achievement, sites must attempt to structure a program which is convenient for student and family participation and provides a consistent delivery of scheduled services. The operational hours should demonstrate that adequate contact time is being spent with students each week. Each student enrolled student must be given the opportunity to attend academic enrichment and youth development/social emotional learning (SEL) that foster maximum positive impact on students' development and learning.

All 21st CCLC student services must be offered outside of the instructional day.

Out of School Time:

- includes programs offered before school, after school, evenings, weekends, and/or during student intercession periods
- does not include lunchtime during the school day, as that is part of the instructional day

Academic

Activities must:

- Address the needs of the schools and communities
- Support achievement of grant specific objectives
- Collect the data necessary to be continuously evaluated using performance measures
- Complement the students' regular academic program
- Support at-risk students to meet the challenging state academic standards in core content areas of reading/literacy, math
- Utilize evidence-based practices and curriculum in the development and implementation of activities

Activities may include:

- STEM and College and Career pathways
- Well-rounded education activities, including such activities that enable students to be eligible for credit recovery or attainment
- Financial literacy
- Cultural programs
- Telecommunications and technology education programs
- Expanded library service hours
- Remedial education and tutoring services

Youth Development/Social Emotional Learning (SEL)

Positive Youth Development is the entire system of support to the whole child ensuring student physical and psychological well-being. Support for youth development should be incorporated into all student classes and activities. Additionally, many activities may be designed specifically to support youth development and social emotional learning (SEL) such as:

- Project-based learning
- Youth leadership
- Student Voice, Student Choice
- Service learning
- Counseling
- Mentoring
- Art, music, cultural & character education and other special interest areas
- Health & physical education
- Environmental literacy, drug & violence prevention, etc.
- Programs that provide assistance to students who have been truant, suspended, or expelled to allow the students to improve their academic achievement

Summer Learning

All Arizona 21st CCLC programs must offer Summer Learning Programs as indicated in the direct student services operational requirements of the 21st CCLC grant application. Summer meals are required to be offered in all summer learning programs.

What is Summer Learning?

Summer Learning, traditionally known as "summer school" was thought of as a requirement for students making up for failing a class during the school year and used "drill and kill" style remedial work. 21st CCLC brings awareness that summer learning brings a rich and engaging opportunities to maximize summer learning by providing high-quality summer programs that include both academic and enrichment activities. This blend of activities can reduce summer learning loss in a captivating and engaging way.

Summer Learning....

- ✓ Focuses on new and accelerated learning
- ✓ Is comprehensive, project-based, hands-on
- ✓ Can take place in a variety of settings and locations
- ✓ Is exciting, engaging, and attractive program
- ✓ Has a strong emphasis on student voice, choice, and identity
- ✓ Provides a unique site climate and culture with tradition/rituals

While most students learn at a similar rate during the school year, when school ends, students in underserved environments struggle to continue learning throughout the summer. As 21st CCLC reimagines summer learning, Arizona's 21st CCLC programs provide safe, developmentally rich settings for learning and growth during the summer months. Summer can be used to re-engage students and provide a meaningful boost to help close opportunity gaps, lead to higher graduation rates, and increase college and career readiness in students.

Successful academic and summer learning 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
- ✓ 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 21st CCLC website at http://www.azed.gov/21stcclc/academics/

Adult Services/Family Engagement

Family engagement is continuous across a child's life and a shared responsibility in which 21st CCLC programs engage families in meaningful ways to actively support their children's learning and development. Programs should aim to build capacity and offer ongoing opportunities that are linked to learning.

Key Components for Building Capacity

System Vision

- **Systemic:** Family-school partnerships are viewed as essential and are 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 Roles

- 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: 21st CCLC programs value and encourage-the voices, knowledge, expertise, capacity and experiences of all 21st 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.

21st 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 21st CCLC participant.

Safe and Accessible Learning Environment

Arizona's 21st CCLC Department of Education requires sites to ensure a safe and easily accessible learning environment for students. All students including students with disabilities are served with appropriate accommodations.

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

Transitions

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

Resources

- Visit the Federal & State Regulations page of the 21st CCLC website for additional information
- An example of an acceptable 21st CCLC Program Basic Emergency Plan is found on the Federal & State Regulations page of the ADE 21st CCLC website Safety and Healthy Environments resources.

Food and Nutrition Services

Arizona's 21st CCLC programs must offer nutritious afterschool snacks and summer meals as part of the essential supports for student learning and health.

- 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.
- Arizona's 21st CCLC snacks and meals are funded by USDA child nutrition programs reimbursements through the Arizona Department of Education's Office of Health and Nutrition. 21st CCLC programs are responsible for applying for reimbursement through this program.
- All 21st CCLC sites are responsible for offering students healthy food during the program that meets the nutrition guidelines of the USDA.
- This is a program requirement; therefore, time for students to eat is considered a part of the program hours

Transportation

Programs must establish procedures for safe transportation of students between the 21st 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 21st CCLC program student 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 21st 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 21st 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 21st CCLC Education Program Specialist.

Partnerships

The 21st CCLC program has called for partnerships with a wide variety of organizations such as volunteers, businesses, local universities, faith-based organizations, and other community organizations in order to offer students more services and additional support. Both Out of School time programs and partner organizations need to collaborate with the 21st CCLC staff to design a strategic approach to ensure that they develop, modify, or continue strong partnerships that benefit students.

Any financial assistance, whether in-kind services or fiscal support must be documented and shared on required reports.

Identifying Potential Partners

A 21st 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 be able to offer your students

Where can 21st CCLC programs find supporting partnerships?

- Form A the Participant's Verification Form Each 21st 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 21st CCLC <u>Program Resources</u> page of the website offers many suggestions for partnership opportunities, and other ways to strengthen 21st CCLC programs, in particular:
 - ✓ The Community as Partner tab contains the External Organizations List
 - ✓ 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.

Professional Development

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

ADE 21st CCLC Annual Professional Development Requirements:

All (NEW) 21st CCLC Principal, Site Coordinator(s) and (if applicable) 21st CCLC Director(s) must participate in the following two profession development (PD) activities:

- 1. 21st CCLC Grant Leadership Orientation (GLO)* training, which explains grant requirements and regulations.
- 2. 21st CCLC annual symposium to support the success and best practices of the 21st CCLC program.

Exceptions to the professional development requirements stated above must be approved by the ADE 21st CCLC Education Program Specialist assigned to the grantee.

In addition to the PD, ADE Education Program 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 opportunities will be provided by your ADE 21st CCLC Education Program Specialist. The ADE 21st CCLC website shares State and National PD opportunities under the Professional Development tab: https://www.azed.gov/21stcclc/trainings-professional-development/

ADE 21st CCLC Grantee Leadership Orientation (GLO)

All (NEW) 21st CCLC District director(s), Principal(s), and Site Coordinator(s) participate in GLO to understand grant requirements and regulations. This orientation includes one online training module that consists of, Fiscal Accountability, Program Implementation, Reporting, and Maintaining Compliance. The module 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 21st CCLC leaders with information necessary for successful grant implementation and effective management.

*To find the online GLO module, see the ADE 21st CCLC Training Module drop down on this page: https://www.azed.gov/21stcclc/trainings-professional-development

ADE 21st CCLC Annual Symposium

This annual symposium offers 21st CCLC grant leaders 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 Networking Meetings

Networking meetings are offered throughout the year in different regional locations in Arizona. Participants have an opportunity to visit a 21st 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 21st CCLC best practices.

ADE 21st CCLC Reporting Modules*

This training is designed for grant leaders responsible for completing required reports for their 21st 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 https://www.azed.gov/21stcclc/trainings-professional-development

You for Youth (Y4Y)

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

Sustainability

21st 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 21st 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
- 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

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 21st CCLC grant funding.

Logo and Language Requirement

All communication to the public about your 21^{st} 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^{st} CCLC program, must include the Arizona 21^{st} CCLC logo and language, found in the 21^{st} CCLC Logo & Language Requirement drop down section of the Federal and State Regulations button on the right side of the ADE 21^{st} CCLC website.



Program Operation Resources

- Federal Legislation, Regulations, and Guidance http://www2.ed.gov/programs/21stcclc/legislation.html
- Approved 21st CCLC Grant Application for the site and related revisions / continuing applications https://home.azed.gov/Portal
- The ADE 21st CCLC website at http://www.azed.gov/21stcclc/ provides grantees with access to relevant guidance and support for grant success. Tools and templates can be found at https://www.azed.gov/21stcclc/21st-cclc-program-resources and at https://www.azed.gov/21stcclc/federal-and-state-regulations.

FISCAL ACCOUNTABILITY

21st 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.** 21st CCLC funds may only be used to pay for authorized activities to meet the needs of participating students and their families. 21st 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 Arizona Department of Education (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 21st 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. Capital items must be used exclusively for 21st CCLC purposes, unless there is a cost share with another funding source
- 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.

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- Field trips are allowable under certain conditions. Contact your assigned Education Program Specialist to determine allowability.
- 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 Team 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 in the online ADE Grants Management system via ADE Connect. Revisions can be made throughout the fiscal year. The deadline for accepting revisions is set by the program area. See the 21st CCLC Website at https://www.azed.gov/21stcclc/ for the current revision deadline. The 21st 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 Revision Examples
 - Move funds because of a late start to the 21st 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 21st CCLC approved class
 - Move funds to order more supplies for the 21st CCLC summer school program
 - Move funds to hire a retired teacher or other contractor to provide instructional services
 - Move leftover academic year funds into 21st 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 Revisions Examples
 - 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 21st 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 <u>prior</u> to submission of a revision in the online ADE Grants Management system. 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 the proposed revision clearly in the narrative descriptions in the ADE Grants Management Enterprise system (GME). Grantees must provide a trail of where the funds came from and where the funds are being moved 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 10/01/22...")
- 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 for ADE approval PRIOR to incurring expenses to avoid an audit
 finding. Failure to maintain alignment with expenditures and the approved 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 21st 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 https://www.azauditor.gov/reports-publications/school-districts/manuals-memorandums or
- 2) Arizona Charter Schools or https://www.azauditor.gov/reports-publications/charter-schools/manuals-memorandums

Expenditure Allocations by School Site

Where a fiscal agent has more than one 21st 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 21st CCLC classes.

Expenditures – Unallowable Costs

Here are some examples of unallowable expenditures. This is not a comprehensive list.

- Alcoholic beverages
- Bonuses or incentives for 21st CCLC Staff
- Capital improvements (permanent fixtures or renovations)
- District level expenses not directly or clearly related to the 21st CCLC program
- Entertainment: costs of entertainment, including amusement, diversion, and social activities and any associated costs
- Goods and Services for personal use
- Lobbying
- Purchases of facilities or vehicles
- Travel expenses for individuals not involved with the project

If in doubt, contact the assigned Education Program Specialist to confirm if a particular cost is allowable.

Expenditures – Costs that require pre-approval of assigned Education Program Specialist

- Advertising and Public Relations Costs such as decorative, promotional, or marketing items
- All field trips

Additionally, the following proposed expenditures should be discussed with the assigned Education Program Specialist to verify that a proposed cost is allowable:

- In general, food costs are allowable in the 21st CCLC grant for two specific reasons:
 - 21st CCLC funds may be used to pay for ingredients which will be used as instructional supplies for an ADE approved 21st CCLC cooking class – costs must be reasonable and identified specifically in the budget narrative
 - 21st CCLC funds may be used to pay for light refreshment to facilitate parent attendance (e.g., coffee and doughnuts, cookies and juice, pretzels, and bottles of water) during 21st CCLC family engagement events. Attendance must be taken at the event and the food costs must be identified specifically in the budget narrative
- Incentives for students may be allowable to increase or improve academic achievement. Such items should be categorized as instructional supplies and listed separately in the budget narrative and should be nominal in value. The cost of incentive per 21st CCLC student is not to exceed \$5-\$10 per 21st CCLC student per fiscal year
- Out of State Student Travel for educational purposes may be allowable if the travel is reasonable and follows district/charter guidelines and policies

Generation of 21st CCLC Program Income IS NOT ALLOWABLE

- Generation of 21st 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 21st CCLC participant fees.
- ✓ Program income is defined as income generated using 21st CCLC resources which also includes program income from fundraising.
- Other examples of 21st CCLC program income that IS NOT ALLOWABLE
 - ✓ Buying a car/computer/drone making kit and then selling it to share the profits among the 21st CCLC students
 - ✓ Buying ingredients for a 21st CCLC Baking class to make baked goods and then selling the items for the class to purchase other items
 - ✓ Buying products for a 21st CCLC Entrepreneurial class to create business to sell products and collect the funds to be used by the 21st CCLC program

Any 21st CCLC Program Income will be required to be paid back to the Arizona Department of Education

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.

21st 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)

21st 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 21st 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> 21st 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 Resource Library has a Guide to Time & Effort Reporting at <u>ADEConnect - Home page (azed.gov)</u>

- ✓ Click on "View Applications"
- ✓ Click on "Grants Management"
- ✓ 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 21st 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 21st CCLC funding as "21st CCLC program property", and must keep a Fixed Assets Log meeting the following guidelines:

- Each 21st CCLC site must prepare a detailed listing of these fixed assets that includes all equipment purchased for 21st 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 21st 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 21st 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 21st CCLC programs.

21st 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		Property	Storage/Use
Logged	Purchase	Name/Description*	Cost	ID Tag#	Location
				See below	English/Yearbook
Example:		Item name (Brand name		Item #001	room locked
11/18/22	11/8/22	and model)	\$731.00	(2022)	supply storage
		Add additional rows as			
		needed			

^{*}Note: Each item must be logged separately.

Property Tag Example:

Property of the 21st CCLC Afterschool Program Item #001 (2022)

Grants Management Enterprise (GME) System

Through ADE's online Grants Management Enterprise system, 21st 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 – Requests for reimbursement of grant expenditures should be submitted 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 Help Desk.

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 21st CCLC grant is on a July 1 June 30 fiscal year
- 21st 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 Help Desk.

Continuing Application - yearly

Continuing Applications are submitted for 21st CCLC programs that will be entering Years 2-5 of their grant. Grantees submit a projected budget for the next fiscal year. Continuation of 21st CCLC funding each year of the grant is contingent on maintaining substantial compliance with all requirements of the grant (See Substantial Compliance under the Maintaining Compliance section for further explanation). The Word version of the Nita M. Lowey 21st Century Community Learning Centers Continuing Application and guidance will be available in the Required Reporting section of the 21st CCLC website in 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
 https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/21st-century-community-learning-centers/

This page includes the following:

- Legislation: Title IV, Part B of the ESEA, as amended by the Every Student Succeeds Act (ESSA)
- Regulations
- Uniform Grant Guidance (UGG)
- Education Department General Administrative Regulations (EDGAR)
- 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 https://gme.azed.gov for reference guides, all APPROVED Funding Applications, Reimbursement Requests, Completion Reports (including all History Log comments) and all other publicly accessible information
- ADE 21st CCLC website with Federal and State Regulations and Guidance https://www.azed.gov/21stcclc/federal-and-state-regulations

REQUIRED REPORTING

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

REPORT	FREQUENCY	REPORTING SYSTEM
Annual Performance Report	2 times per year	21st CCLCAPR Data
(APR)		Reporting System
Student Attendance Reporting	Ongoing, rec. weekly	SIS to AzEDS
Program at a Glance	Yearly	EMAC
Summary of Classes Report	2 times per year	EMAC
Site Evaluation Report	Yearly	EMAC
Completion Report	Yearly	GME
Continuing Application	Yearly	GME

Important notes:

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

21st CCLC APR DATA REPORTING SYSTEM

Through this online system, accessible in ADE Connect, 21st CCLC grantees will submit the following:

Annual performance Report (APR) – 2 times per year

The US Education Department (ED) requires all 21st 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.

21st CCLC STUDENT PROGRAM ATTENDANCE IN DISTRICT STUDENT INFORMATION SYSTEM

Through this online system, 21st CCLC grantees will submit the following:

21st CCLC Student Attendance Reporting – at least weekly through SIS to AzEDS

21st CCLC Student level attendance is 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 for compliance.

ADE 21st CCLC REPORTS-EMAC System

ADE 21st CCLC Monitoring & Required Reporting documents will be collected in *Educational Monitoring, Assistance & Compliance (EMAC)* system (an application in ADE Connect). It is important for any person responsible for 21st CCLC document and report submission has access to EMAC. The EMAC application system offers both direct upload of documents and online forms that will collect required 21st CCLC reports and/or specific program data. Contact your Entity Administrator to gain access to EMAC in ADE Connect. Contact your EMAC Administrator to be assigned to 21st CCLC monitoring programs in EMAC.

21st CCLC Program at a Glance Report – *yearly*

The 21st CCLC Program at a Glance Report is related to the program's plans for the current year. Due early in the fall semester, this report includes programmatic requirements updates and approved by the Education Program Specialist.

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 21st CCLC program. It enables ADE staff to provide technical assistance throughout the year to grantees that may need additional guidance.

21st 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.

GRANTS MANAGEMENT ENTERPRISE (GME)

Through this online system, accessible in ADE Connect, 21st 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 21st CCLC Education Program Specialist for additional technical assistance.

Reimbursement Requests - at least monthly

Because the 21st 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 21st 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. 21st CCLC funds are not allowed to be carried over from one fiscal year to the next. The 21st 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 Application – *yearly*

Continuing Applications are submitted for 21st 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 be eligible for continued funding for years 2, 3, 4, and 5.
- Minor changes in the grant program operation may be requested for approval in the Continuing Application. This can include programmatic changes but, again, these must honor the integrity of the original awarded grant proposal.
- Recommendation: Check with your ADE 21st 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 http://www2.ed.gov/programs/21stcclc/legislation.html
- Approved 21st CCLC Grant Application for the site and related ADE approved Application Revisions / Continuing Applications https://home.azed.gov/Portal/
- ADE Grants Management Office Guidance and Procedures at http://www.azed.gov/grants-management/ or by phone at (602) 542-3901 or Helpdesk.
- ADE 21st CCLC website Required Reports page at http://www.azed.gov/21stcclc/required-reporting/

EMERGENCY RESPONSE

The Arizona Department of Education (ADE), 21st 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 21st 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. 21st CCLC sites will continue to obtain guidance from the following:

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

The 21st CCLC Team is committed to supporting 21st 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 21st CCLC grant expectations, contact your assigned ADE 21st CCLC Education Program Specialist as soon as possible to discuss your specific situation and to determine if you qualify for flexibility of program requirements.

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

- Compliance Expectations
- Grant Accountability Requirements which may include:
 - o 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 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 in any situation.

COMPLIANCE MONITORING AND EVALUATION

Ultimately it is the responsibility of the sub-grantee to assure the greatest fidelity with the management of their approved 21st CCLC Grant as outlined in the General Statement of Assurance¹. The Arizona Department of Education is required to monitor the quality and effectiveness of the programs operating with funds provided through 21st CCLC grants.

Monitoring reviews are conducted to ensure compliance with federal and state requirements and verify compliance with items included within the approved application.

Monitoring not only serves to ensure compliance, but also provides a means to identify areas that require additional support and technical assistance from ADE. Each grantee is assigned to an ADE 21st CCLC Education Program Specialist who will monitor programs, provide guidance and offer support to grant program leaders for the duration of the 21st CCLC Grant to help with successful program implementation.

Program Assurance Requirements

Grant recipients are required to:

- ✓ Read and understand their own approved 21st CCLC grant application
- ✓ Implement what is written in the original awarded grant
- ✓ Submit and follow the ADE General Statement of Assurance¹
- **✓** Follow the ADE Grant Management Business Rules
- ✓ Submit revision requests for any fiscal or programmatic change
- ✓ Submit complete reports on or before deadlines
- ✓ Keep proper records
- ✓ Submit Audit Evaluation when required
- ✓ Keep relevant records organized for announced and unannounced site visits
- ✓ Receive approval for revisions prior to implementing any change in spending or program
- ✓ Make progress towards the objectives outlined in the awarded grant
- ✓ Provide intentional program planning through lesson plans and/or syllabi
- ✓ Student/Teacher ratio:
 - o Academic 10 enrolled students (6 actual students) to 1 teacher
 - Summer 15 enrolled students to 1 teacher
- ✓ Site leaders must notify ADE 21st CCLC of new 21st CCLC Program coordinators

¹ 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.

- ✓ 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

To address the above requirements, the 21st CCLC team measures a site's progress towards meeting the 21st CCLC grant expectations. The Site Compliance Tool- Outline of Sections is a list of task requirements that measure the execution of the 21st CCLC grant and is an integral part of each site visit with the 21st CCLC Education Program Specialist. This list is also used as a site's self-assessment in the end of year report, the Site Evaluation (See the Required Reporting section of this handbook for more details).

A site may use this tool to complete a self-assessment at any time and to prepare for an onsite monitoring visit. This self-assessment tool can help program leaders identify strengths and weaknesses in program implementation. During an onsite monitoring visit, compliance will be verified with accurate documentation and records retention. Programs are encouraged to organize, label, file, and retain records for evidence. Records may be in either paper or electronic format but should be easily accessible during the review process.

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 21st CCLC students.

3. Alignment to the School Day

- a. Student data is used to make decisions regarding program implementation.
- b. Regular communication occurs between 21st 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 21st 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, 21st 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. All (NEW) 21st CCLC Principal(s), Site Coordinator(s), and 21st CCLC Director(s) (if applicable) participated in the Grant Leadership Orientation (GLO) to understand grant requirements and regulations.
- b. Additionally, all (NEW and CONTINUING) Principal(s), Site Coordinator(s), and 21st CCLC Director(s) (if applicable) participated in the 21st CCLC annual symposium to support the success and best practices of the 21st CCLC program. Any exceptions to this requirement must be approved in writing by ADE 21st CCLC program specialist assigned to the grantee.

Grantee Monitoring Schedule

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 21st 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 Monitoring and Support Schedule includes:

Monitoring and Support Schedule

Year 1	Year 2	Year 3	Year 4	Year 5
Implementation	Continuation			
Technical Assistance and Professional Learning to support Strategic Implementation	Technical Assistance and Professional Learning to Support Continuous Improvement			
Site Visits Monitoring		Targeted Monitoring Visits as Needed		
Desktop Monitoring through Programmatic and Fiscal Reports				
End of each Year – Substantial Compliance Status Notification				

Types of Monitoring

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

Desktop Monitoring

ADE 21st 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 21st 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 21st CCLC Registration/Permission Form
- Lesson Plan, Curriculum Overview and/or Syllabi
- 2. ADE 21st CCLC Education Program Specialists also review the following supporting documentation for evidence of compliance:
- Original Awarded 21st CCLC Application
- Annual Continuing Application
- ADE Grants Management System (GME)

- Site Evaluation Report
- Student Attendance Reporting (AzEDS)
- Summary of Classes Report
- Site Visit Notes
- Written Communication

- Annual Performance Report (APR)
- After School/Summer Safety Plan
- 21st 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 21st CCLC grant with fidelity and to comply with state and federal guidance and regulations. Site visits from the ADE 21st CCLC Education Program Specialist accomplish compliance monitoring and enable the ADE 21st CCLC Education Program Specialist to offer technical assistance and resources to help program leaders strengthen their programs.

During a site visit, the ADE 21st 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:

- One on-site visit must be completed within the first 2 years of a new award.
- Sites that are out of compliance
- As deemed necessary by the ADE 21st CCLC Education Program Specialist

Following the site visit, a 21st CCLC Compliance Report is completed and sent to 21st 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 21st CCLC district and site program leaders.

Risk Level Categories

The Program Area will make a risk level determination based on professional judgement and risk cues to determine if the identified risk(s) will have a low, medium, or high impact on the project.

The following categories have been established to identify the performance of sites:

Four Risk Levels

I. No Apparent Risk
II. Low Risk/ Warning
III. Moderate Risk/ Out of Compliance
IV. High Risk/Out of Compliance

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 address any low-risk single requirement are subject to a "Warning" status. Grantees will be provided with written communication identifying the issue(s) that need to be corrected, 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 from ADE 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 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 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 21st 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 21st CCLC Education Program Specialist

Automatic Moderate Risk Findings include but are not limited to:

- Failure to meet **multiple** grant requirements that are considered to have a low-risk impact to the project.
- Failure to resolve previous low risk findings or requests.
- Failure to serve at least the required percentage of the number of regular attending students.
- Failure to offer the required percentage days of programming.
- Failure to meet a grant requirement that is considered to have a moderate impact to the project.
- Failure to submit accurate reports and documentation by required due dates.

IV. High Risk/Out of Compliance

Grantees 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 21st 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 the ADE Grants Management system.

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 21st 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

Grantees must adhere to the fundamental program requirements as outlined in the original awarded grant by serving the number of "regularly attending" students (30 days or more) and offering services for 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.

In recognition that programs may initially need time during the first year of the grant award to implement programming and build the "Out of School time" culture to meet program requirements, 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%

Reduction of Funds

Sites in Risk Level III - "Out of Compliance" status will be subject to a 25% reduction in funding the following year. The action plan may include a reinstatement of funds after re-evaluation is completed to determine if site is on track for meeting all grant requirements. Site is recommended to run full programming to start the year, even though operating with the 25% reduction in funding in place. This will offer the best chance of success in earning reinstatement of full funding for the rest of the program year.

Substantial Compliance (*Maintaining Funding for the 5-year Duration*)

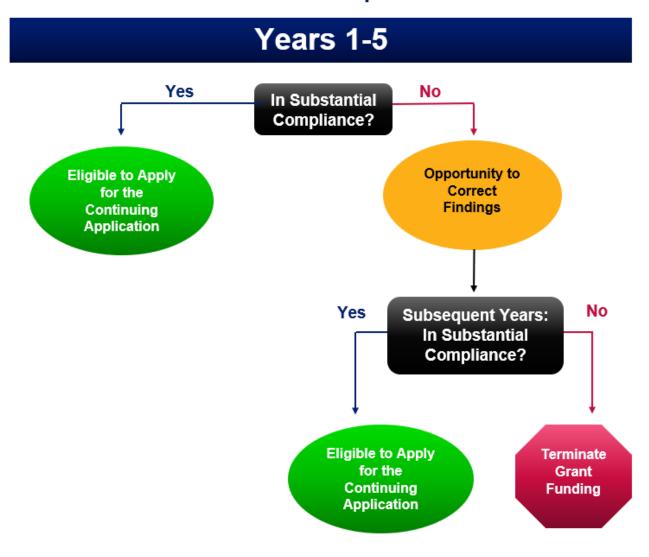
21st CCLC guidelines require that year to year funding will be earned if a grantee is in Substantial Compliance with grant requirements. Grantees are evaluated by using federal and state reports, the compliance monitoring tool, and other observations and data that assist with identifying the grantee's level of performance.

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

Years 1-5.

- 1. If a grantee has completed the program year in Substantial Compliance, the site is eligible for continued funding.
- 2. If a grantee is found to be Out of Compliance, the site will be provided with additional technical assistance, heavy monitoring, and other requirements relevant to the site's finding(s). The grantee will have the opportunity to correct and resolve the finding(s).
- 3. If the grantee does not achieve Substantial Compliance at the year-end evaluation in any two years during the 5-year award, 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 additional years of funding.

This diagram represents the standard progression steps of Substantial Compliance





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). 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 21st CCLC Grant may require other remedies legally available to the Arizona Department of Education.

Obligations on Closing the Grant

Grantees are responsible for the closure of 21st 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 21st CCLC program services to keep any capital items and instructional supplies that were purchased through 21st 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 21st 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 application. However, the following annual reports must be submitted in the last year of the grant:

- Annual Performance Report (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 21st CCLC grant

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

Compliance Resources

- Federal Legislation, Regulations, and Guidance specific to 21st CCLC grant funding http://www2.ed.gov/programs/21stcclc/legislation.html
- Approved 21st CCLC Grant Application for the site and related revisions / continuing applications. Contact your ADE 21st CCLC Education Program Specialist if you do not have a copy of your own application.
- ADE Grants Management Office Guidance and Procedures http://www.azed.gov/grants-management/ phone (602) 542-3901 and press option 1.
- ADE 21st CCLC website http://www.azed.gov/21stcclc/

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

TECHNICAL ASSISTANCE (TA)

Introduction

The Arizona Department of Education provides guidance and assistance for successful implementation and enhancement of 21st CCLC programs. Some forms of TA that the Department offers include research-based evaluation tools, site visits, telephone/email consultations, and customized training and professional development. This section will include some recommendations for program support.

Website

The ADE 21st CCLC website has been created to offer useful guidance and information, which are updated in real-time. The informational website acts as a user's guide and contains comprehensive information about the 21st CCLC work in Arizona. https://www.azed.gov/21stcclc

Sections on the website include:

- What is 21st CCLC?
- Program Calendars
- Federal and State Regulations
- Required Reporting
- Program Resources
- Professional Development
- FAQ's
- State Reports
- COVID-19 and 21st CCLC

- Title IV-A and Title IV-B Symposium
- Academics
- Youth Development/Social Emotional Learning (SEL)
- Family Engagement
- Grant Application Competition Information
- Spotlight on 21st CCLC In Action
- Frameworks for 21st CCLC

Frameworks

Frameworks have been created for many of the critical areas under the 21st CCLC components. The purpose of the frameworks is to provide programs with the foundation upon which everything else is built. They also provide a bird's eye view for easy understanding and reference. The following frameworks are available.

- Academic Framework
- Youth Development/Social Emotional Learning (SEL)Framework
- Family Engagement Framework
- Summer Learning Framework
- Safe and Healthy Environments Framework
- Partnerships Framework
- Professional Development Framework
- Sustainability Framework

AUTHORIZING LEGISLATION

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

PART B— Nita M. Lowey 21st Century Learning Centers Grant https://www2.ed.gov/programs/21stcclc/index.html



U.S. Department of Education

ESSA Arizona State Plan, 21st CCLC

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



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

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Kathy Hoffman

Superintendent of Public Instruction

Equity for all students to achieve their full potential



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