**September 2020**

**21st Century Community Learning Centers**

**Guidance for the 2020-21 School Year**



**Ready Schools, Safe Learners**

**Companion Document**

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# 

# Acknowledgement

We wish to acknowledge that our guidance has been informed by 21st CCLC Program Directors and leaders, educators, out-of-school time leaders in Oregon, and State Education Agency (SEA) leadership across the nation who have been critical thought partners. The information provided in this document is the result of on-going engagement sessions and direct feedback from these critical partners. In the context of shared thinking and problem solving, our own thinking and planning has been enhanced through these processes. We appreciate the collective effort, as we rise to the challenge of serving our students and families during this pandemic. We are indeed stronger together.

# Summary

**Effective Date**

This guidance was issued in September 2020 and will remain in effect until further notice. This document is an update to earlier 21st CCLC guidance released before this date and supersedes any previous versions.

**Authority and Purpose**

The Nita M. Lowey 21st Century Community Learning Centers (21st CCLC) Title IV-B program is funded by a federal grant from the U.S. Department of Education, and administered by the Oregon Department of Education (ODE). This document contains guidance specifically related to the functioning and operation of 21st CCLC grant for the 2020-21 school year in light of COVID-19 pandemic.

The purpose of this document is to clarify and provide guidance for 21st CCLC Program Directors and leaders regarding the requirements of the Every Student Succeeds Act (ESSA), United States Department of Education (USDE) guidance and the ODE [*Ready Schools, Safe Learners*](https://www.oregon.gov/ode/students-and-family/healthsafety/Documents/Ready%20Schools%20Safe%20Learners%202020-21%20Guidance.pdf) (RSSL) guidance. This guidance is not intended to supersede any federal guidance and is subject to change if further federal guidance is received from USDE.

This document is also intended to serve as a *guide*. Some items are not requirements, but rather best practices for a successful implementation of programming during the pandemic. The below key will help 21st CCLC Program Directors and leaders determine the difference between a recommendation and requirement.

**Checkboxes () indicate requirements; arrows (⇨) indicate recommendations**.

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# 21st CCLC Purpose and Grant Goals

The purpose of the [21st Century Community Learning Centers (21st CCLC)](https://www.oregon.gov/ode/schools-and-districts/grants/ESEA/21stCCLC/Pages/Inclusion-Resources.aspx) (Title IV-B) grant is to establish community learning centers focused on helping children in low income schools succeed academically through the application of evidence-based practices when school is not in session by:

1. Providing opportunities for academic enrichment and tutorial services to help students (particularly students who attend low-performing schools) meet state performance standards, in core academic subjects such as reading, writing, and mathematics;
2. Offering students a broad array of additional services, programs, and activities, such as youth development activities, service learning, nutritional and health education, drug and violence prevention programs, counseling programs, arts, music, physical fitness and wellness programs, technology education programs, financial literacy programs, environmental literacy programs, mathematics, science, career and technical programs, internship or apprenticeship programs, and other ties to an in-demand industry sector of occupation for high school students that are designed to reinforce and complement the regular academic program of participating students; and
3. Offering families of students served by community learning centers opportunities for active and meaningful engagement in their children’s education, including opportunities for literacy and related educational development.

# 21st CCLC Operational Blueprints

For the 2020-21 school year, each 21st CCLC program will work in collaboration with the school(s) from which the center draws its students, districts, and partnering organizations to develop a 21st CCLC Operational Blueprint for Reentry that is tailored to an individual center’s local context and informed by local needs.

**Revising Plans**

The 21st CCLC Operational Blueprint will serve as a living document and can be updated with additional information as the school year progresses. If a change in the program occurs, original information should not be deleted. Additional information should be added by changing the font color to red and entering the date of the change. An example of how to add an updated entry is displayed below:

10/24/2020 – Program hours changed to 3:30-5:30 on Mondays and Wednesdays to allow for additional time for cleaning.

**Required**

* All 21st CCLC programs must make their Operational Blueprint available to the community on the program or district website.
* Each 21st CCLC grantee must submit a separate Operational Blueprint for each site/center.
* Blueprints must be submitted to ODE as a Word document via Secure File Transfer (instructions located in Appendix) or email to [**Leslie Casebeer**](mailto:leslie.casebeer@state.or.us)before the start of fall programming or no later than October 12, 2020 for the 2020-21 school year.
* 21st CCLC programs are expected to update this document on a monthly basis *if* changes have been made to any element of program delivery (e.g., program location, hours, instructional model, etc.).

**Recommendations**

* Meet early and often with district, school leadership and community partners to align 21st CCLC services and be a part of planning.
  + Establish space and create common health and safety processes and procedures
  + Work to align instructional models, objectives and priorities to accelerate and reinforce learning.
* Survey families, students, teachers and staff to identify the needs in the community. This will help to determine the best times to operate programs.
* Assess where additional capacity and support may be needed from partners to support plans and *RSSL* requirements.
* Consider involving other spaces in the community in addition to school buildings (such as public libraries, Boys and Girls Clubs, YMCAs/YWCAs, daycares, faith-based organizations and museums) to provide in-person support.
* Review or create any needed memoranda of understandings (MOUs) to foster clear communication, expectations and to ensure students and staff are safe.

# Time and Duration of Services

During a typical school year, all 21st CCLC programs are expected to operate from September through June, and/or up to the last week of the regular school year. 21st CCLC programs must also operate a minimum of 12 hours in a typical week, or equal four service days per week, be open at least 2 hours a day totaling a minimum of 300 program hours per school year.

For the 2020-21 school year, 21st CCLC programs must meet the 300 program hour requirement. Maintaining, or nearly maintaining, the total numbers of hours and program days in approved applications remains a baseline goal. Flexibility tied to local capacity and the goal to only execute safe, high-quality, and sustainable programming can be expected. 21st CCLC Program Directors must work closely with ODE staff to mitigate any issues in providing full services to students and families.

**Start of Programs**

As 21st CCLC program leaders consider options for reopening, they must reach out proactively to school district leadership and principals to coordinate health, safety, and the best ways to supplement instructional models aligned to 21st CCLC grant goals. Programs may need to delay start dates to ensure effective coordination of programming. Additionally, 21st CCLC programs need time with staff to prepare for the 2020-21 school year. This could include, but is not limited to, professional learning, training on new protocols, setting up physical spaces, designing instruction, setting up technology, and cleaning and disinfecting.

All 21st CCLC programs must start providing Distance Learning services to students and families by **October 12th** if they are unable to provide On-Site or Hybrid Instructional Models.

**Required**

* Begin services no later than October 12, 2020.
* Coordinate 21st CCLC services with the school(s) from which the center draws its students, districts, and partnering organizations.
* On-site services must equal a minimum of 12 hours in a typical week, or equal four service days per week, be open at least 2 hours a day totaling a minimum of 300 program hours per school year.
* Distance Learning or Hybrid services must provide enough activities and services for students and families that would take a minimum of 12 hours in a typical week to complete totaling a minimum of 300 program hours per school year. Programs should strive to create a schedule(s) that includes at least four service days per week and be at least 2 hours a day.
* Programs must have all of the following in place before providing in-person services.
* Required Community Health Metrics have been met ([Ready Schools, Safe Learners](https://www.oregon.gov/ode/students-and-family/healthsafety/Documents/Ready%20Schools%20Safe%20Learners%202020-21%20Guidance.pdf), Section 0);
* Health and safety requirements have been met ([Ready Schools, Safe Learners](https://www.oregon.gov/ode/students-and-family/healthsafety/Documents/Ready%20Schools%20Safe%20Learners%202020-21%20Guidance.pdf), Sections 1-3);
* Operational Blueprints and 21st CCLC Reentry Plans have been submitted to ODE and available to the public;
* Health and safety processes and procedures are fully in place and ready to be implemented;
* Staff have received the necessary health and safety training;
* Families and caregivers have been notified, and plans for health and safety protocols shared.

# Health and Safety Requirements

The RSSL (Sections 0-3) serves as the direct guidance for all 21st CCLC programs regarding health and safety requirements. The template in 21st CCLC Operational Blueprints has been modified to adjust specifically for out-of-school time settings under these requirements. Program Directors should directly refer to both the 21st CCLC Operational Blueprint and RSSL (Sections 0-3) when creating plans for health and safety requirements.

While these requirements may seem overwhelming at first, it is critical that we make every effort to keep students and families safe. As programs plan, it is important to remember:

* “You don’t make the timeline. The virus makes the timeline.” – Dr. Anthony Fauci;
* Our state will be living with the virus until there is widespread immunity, which is many months off;
* The best tools to protect individuals are physical distancing, face coverings, and hygiene;
* Every health restriction lifted increases opportunity for transmission and will increase cases.

21st CCLC staff must implement health and safety requirements as written; however, the reality of working with children means there may be times based on interaction or physical space limitations when it is necessary to adjust implementation of RSSL guidance. Programs will need to consider a continuum of risk levels when some requirements/recommendations may not be fully accommodated. For example, maintaining physical distance (six feet apart from others) is best. There may be times when this is not possible, so programs should take other steps to mitigate the close proximity. Steps could include ensuring it is for a very short duration, ensuring handwashing before and after, and reinforcing safe etiquette (e.g., avoid touching of the face, teaching safe etiquette for coughing and sneezing, and/or proper use of facial coverings).

**Required**

* All health and safety requirements have been met in section 3 of 21st CCLC Operational Blueprints before the start of any in-person programming.

# Cohorting

To the extent practicable, out-of-school time programs must apply the same cohorting structures as the school day. The goal of effective cohorting is to limit as much disruption to quality learning experiences, while maximizing safety and efficiency in contact tracing. Consider the logistics of after-school program space utilization to ensure that social distancing requirements are maintained, and students are exposed to the fewest practicable number of other students and staff.

**Possible Cohorting Models**

* **School-Based Program (e.g., 2nd Grade, Class A):** After-school students are assigned to the same classroom during the school day. The after-school staff enters the same classroom at school dismissal, and provides programming and support to those students only from the end of the school day until 6:00 pm.
* **School-Based Program with Transportation (e.g., 2nd Grade, Class B):** After school, students are assigned to the same classroom during the school day. These students are bussed together to the after-school location site at school dismissal, and the after-school staff provides programming and support to this specific group of students from the end of the school day until 6:00 pm, keeping the same group of students together without co-mingling with other after-school groups.
* **School-Based Combined Grades (e.g., 1st Grade and 2nd Grade, with five children from each grade needing after-school care):** Students are assigned to classrooms according to grade, keeping the after-school students together. Students are dismissed at the end of the school day, with five students from the 1st Grade class and five students from the 2nd Grade class attend the after-school program. The group of ten (10) students is maintained without commingling with other after-school groups. This limits the exposure to only the two classrooms.

**Required**

* To the extent practicable, school-based 21st CCLC programs must apply the same cohorting structures as the school day in which they provide services.
* To the extent practicable, 21st CCLC programs serving students from multiple feeder schools must make every effort to align to the Operational Blueprints from each school to:
  + Maintain stable cohorts of students;
  + Provide common health and safety protocols that meet requirements in Sections 0-3 of RSSL guidance; and
  + Provide supplemental services to support varied school instructional models and schedules.

# Instructional Models

There are three Instructional Models for 21st CCLC programs in the 2020-21 school year: *On-Site, Hybrid, and Distance Learning*.

21st CCLC programs will select an instructional model based on multiple factors, including but not limited to: local COVID-19 status, school/feeder school Operational Blueprints, program facility capacity, staffing capacity, operational capacity, needs of high-risk students and staff, available space, student enrollment, budget, technology capabilities, and input from staff, students, families, and community members.

If a COVID-19 outbreak requires school closure (at the state, regional, or local level), or if the school district in which the 21st CCLC supports do not meet the community health metrics, 21st CCLC programs must employ Distance Learning. In the absence of a COVID-19 outbreak, and if the school district in which the 21st CCLC supports meet the community health metrics, 21st CCLC programs may select another Instructional Model. See RSSL Guidance (Section 0) for more information on health metrics requirements.

**On-Site Instructional Model**

This model is the closest to how 21st CCLC programs operated prior to COVID-19. This model provides direct, in-person services to students and families meeting the required number of hours and weekly services under the grant. If programs are unable to provide the required amount of services on-site, they must provide some type of supplemental distance learning opportunities, essentially moving the program into the Hybrid Instructional Model.

**Hybrid Models**

The Hybrid Instructional Model allows 21st CCLC programs to integrate activities simultaneously with groups of students on-site and through distance learning. While complex and varied, Hybrid Instructional Models allow for the most flexibility when trying to supplement school schedules. Programs should strive to provide On-Site programming to the greatest extent possible while meeting public health requirements.

**Distance Learning**

In this model, all 21st CCLC students are engaged in learning through Distance Learning. 21st CCLC activities and services occur remotely with very limited exceptions for in-person support (see RSSL section 0 for exceptions). 21st CCLC programs must provide comprehensive opportunities for students and their families that include alignment to all three grant goals.

**Asynchronous**- Learning that occurs in elapsed time between two or more people. Examples include email, online discussion forums, message boards, blogs, podcasts, etc.

**Synchronous**- Learning in which participants interact at the same time and in the same space.

Distance Learning includes on-going interaction with one or more staff members who skillfully guide 21st CCLC activities. It can include multimedia communication, blended learning strategies and may, or may not, be separated in time, often referred to as asynchronous or synchronous learning.

21st CCLC grantees may use virtual platforms that best meet student and family needs. Programs are encouraged to align platforms with systems students are using during the school day. In selecting tools to deliver services, programs must ensure the privacy and security of student data, while abiding by the [Family Education Rights and Privacy Act](https://studentprivacy.ed.gov/sites/default/files/resource_document/file/FERPA%20and%20Coronavirus%20Frequently%20Asked%20Questions.pdf) (FERPA). See 21st CCLC Best Practices for Safe Virtual Programming in the appendix of this document for more information.

While use of technology is one means of connecting with students, programs should also plan ways to support students, through Distance Learning, who may not have access to technology so they may continue to remain engaged offline. Programs need to be mindful about the amount of screen time students may be experiencing, and find creative solutions to get students away from devices, and actively engaged in non-virtual 21st CCLC activities.

**Flexible Instructional Models**

All 21st CCLC programs need to flexibly plan to use multiple models throughout the school year to meet evolving health conditions. If an outbreak emerges and requires Distance Learning, 21st CCLC programs can collaborate with schools and districts to provide limited In-person learning and in ensuring that all students have remote access to learning, school meals, and are also maintaining caring connections with adults from their school communities.

**Required**

* All 21st CCLC programs must be able flexibly adjust between Instructional Models for the 2020-2021 school year to meet evolving health conditions.

# Coordinated Model Implementation

**Schedules**

21st CCLC programs should work closely with the school(s) from which the program draws its students to establish a schedule for services. It is important to be mindful that federal Supplement not Supplant provisions remain in full effect. If students are at home for Comprehensive Distance Learning, it is still considered school and part of the regular school day. 21st CCLC programs may run programs for students during this time provided that programs complement and do not duplicate the school day program, and they do not conflict with the school day remote learning schedule(s). 21st CCLC programs will include a schedule for services in each Blueprint submitted to ODE. Programs should also keep a schedule of school day services for documentation and available upon request for auditing purposes. For more information, see Supplement Not Supplant under the Use of Funds section of this document.

**Complementary Services**

21st CCLC programs should work closely with the school(s) from which the center draws its students, districts when planning enrichment activities by:

* Coordinating tutoring opportunities and homework assistance for students who are most in need;
* Coordinating outreach and information to not overwhelm families and students;
* Labeling all supplementary material as optional, and keeping materials easy to read and as family friendly as possible;
* Clearly marking enrichment activities and materials sent to families with the program name to avoid confusion; and
* Ensuring all activities are aligned to the purpose and goals of the 21st CCLC program.

**Service Ideas**

* Alternate Times:Consider creative programming options at alternative times, including asynchronous activity outside of traditional afterschool hours. This could include during mornings, evenings, weekends (such as Saturday programs), and vacation periods.
* Focus Groups: Consider establishing groups within hybrid models that are organized based on a content or a club focus, particularly for older youth (art, music, literacy, leadership, STEM, sports, tutoring, activism), but with open flexibility over longer periods of time to include other engaging and necessary program components.
* Staggered Schedules: Some schools and districts may have A and B groups that attend on alternating days or in AM and PM rotations. In either case, 21st CCLC staff could:
  + Work with the group that is not currently in class, or in school day Comprehensive Distance Learning;
  + Implement innovative and engaging activities that build on the lessons taught in class;
  + Supporting students in completing projects assigned in class;
  + Facilitate computer science activities, theatre, visual arts, and other well-rounded activities to enrich students’ learning experiences;
  + Support homework completion, individual tutoring and projects assigned in class virtually or in-person;
  + Strategically assign staff to coordinate additional check-ins, supplemental learning supports, and instructional support;
  + Strategically pair learning mentors versed in culturally responsive and sustaining practices to provide additional connection, care, and support in learning; and/or
  + Partner in providing access to meals and other community resources.
* Different Grade Levels: Similarly, if districts choose to have in-school programming for younger students and continue distance learning for older students, 21st CCLC programs could schedule in-person activities for the older students, if the appropriate health metrics make this allowable.

**Required**

* 21st CCLC must provide coordinated and complementary activities and services aligned to the school day and grant goals (see the 21st CCLC Purpose and Grant Goals section) regardless of the Instructional Model being implemented.
* Federal Supplement not Supplant provisions remain in full effect.

# Program Quality

As Program Directors and Center Coordinators lead efforts in designing instructional models and the activities that will take place within those structures, they should actively utilize their center’s Program Reflection Tool based on the 11 Elements of Quality Programs to help inform decision making.

**21st CCLC 11 Elements of Quality Programs**

(Finn-Stevenson, 2014; Granger, 2010; Hammond & Reimer, 2006; National Afterschool Association, 1998; Scharf & Woodlief, 2000).

1. **Program Administration**: Programs should have *and be driven by* a clear vision, mission, and purpose; operation is supported by well-documented policies and procedures; staff have appropriate levels of structure, guidance, and autonomy.
2. **Staff Qualifications and Staff Development**: Programs should ensure adequate staffing and recruit, and retain highly skilled personnel; provide ongoing professional development at all staff levels; ensure staff have an understanding of targeted and diverse learning strategies; and promote a consistent staff presence throughout the program offering.
3. **Partnerships**: Programs should strive for engagement with and outreach to schools, families, and communities, and promote complementary alignment of school day and afterschool through regular communication, resource allocation, and data-sharing.
4. **Evaluation and Continuous Improvement**: Programs should have systems in place for ongoing data collection, assessment, and reflection using program data; programs should engage in regular and ongoing action planning for continuous improvement.
5. **Sustainability**: Programs should be engaging in continuous planning and assessment to ensure fiscally sustainable programming.
6. **Diversity, Inclusion, Access, and Equity**: Programs should ensure that they are available and accessible for all youth; programs should develop and implement policies, and practices focused on respecting and supporting diverse youth participants and families, keeping context at the forefront; program should support staff in building cultural competence among staff and with youth through culturally responsive practices, activities, and opportunities.
7. **Physical Environment**: Programs should ensure that there is indoor and outdoor space necessary for the program to fully operate, and is appropriate for all planned activities.
8. **Safety, Health, and Nutrition**: Programs should ensure the emotional and physical safety of youth and staff; provide a healthy, welcoming, and accommodating environment; ensure that emergency preparedness is a priority; and provide nourishment based on health and wellness standards for children and youth.
9. **Interactions and Relationships:** Program staff at all levels should develop positive, ongoing connections between and among youth participants and adults in the program; staff should engage in collaboration and partnerships, strive to address barriers, and promote supportive and encouraging norms for youth and staff interaction.
10. **Youth-Centered**: Programs should focus on youth development, interest, and influence; provide experiential and age-appropriate activities; ensure relevant, authentic, and developmentally appropriate opportunities for youth voice and choice, and ensure those opportunities are reflected in planning, programming, and opportunities for youth leadership; and intentionally support academic, social, and emotional competence-building.
11. **Social and Emotional Learning and Active Engagement**: Programs should be intentional in designing activities that promote youth resiliency, and encourage reflection and higher order thinking; programming and activities should intentionally support high levels of youth engagement and expectation; the program environment and activities should cultivate a sense of belonging; and staff should receive training in and promote positive behavior supports for reframing conflict.

# Physical Location

School districts and community-based organizations utilizing school buildings for 21st CCLC should consult with their district and/or school administration to ensure 21st CCLC programming will have access to all necessary programming spaces. If previous spaces are no longer available, Program Directors should negotiate with school principals and/or district administrators to identify alternative locations to implement in-person services.

If a program is considering a change or an addition to the physical location of a center, it must be approved by ODE before services begin. Programs will need to provide documentation, including but not limited to, a narrative that ensures the center is safe, accessible, and has the capacity to serve the number of students proposed, and is appropriate for the planned activities.

**Required**

* Change(s) or addition(s) to the physical location of a center must be approved by ODE before services begin.

# Transportation

Federal guidance advises that there can be no barriers preventing students’ participation in 21st CCLC. Programs must offer students a means of transport if they qualify for afterschool, and are unable to walk to community centers. Programs should pay particular attention to protocols used in student transportation to minimize the spread of COVID-19 and protect both youth and employees. *Ready Schools, Safe Learners Guidance* (Section 2i) outlines the specific health and safety requirements for student transportation.

Programs may use 21st CCLC transportation funds to distribute snacks, meals and educational materials to students. Some school districts deliver 21st CCLC and other academic supplies along with meals provided for the regular school day program at designated pick up points or via home delivery by district vehicles. If this is the case, then justification would need to be provided in 2020-21 budgets for transportation costs.

**Required**

* If providing On-Site services, 21st CCLC programs must offer students a means of transport if they qualify for the program and are unable to walk (See RSSL, Section 2).
* If transportation costs include the delivery of meals and educational materials to students, this cost needs to be documented in the 21st CCLC 2020-21 Budget.

# Student Recruitment and Retention

Actively recruiting and retaining students should continue to be a focus for all 21st CCLC programs. 21st CCLC grants are funded, in part, based on the number of students’ programs indicated they would serve in their original grant application. Programs should make every effort to reach enrollment goals, and actively implement effective recruitment efforts to meet these goals.

During the 2020-21 school year, 21st CCLC programs should prioritize recruitment efforts to foster better and more equitable opportunities for students who are:

* Historically underserved;
* Differentially impacted by the virus (e.g., technology barriers, isolation); and/or
* In need of additional support (e.g., academic, social and emotional, accommodations to access CDL).

These student groups should also be prioritized for Limited In-Person and On-Site services.

**Required**

* 21st CCLC must actively work to recruit and retain students into programs until enrollment goals are met.
* 21st CCLC must prioritize students who are historically underserved, differentially impacted by the virus, or in need of additional support.

# Data Tracking and Evaluation

**Enrollment**

It is important to note **enrollment does not equal participation**. Enrollment alone is not a valid indication that a student has actually ever participated in services or benefited from a specific offering. If an enrollment form is used by the 21st CCLC program, then all completed forms can be counted for program enrollment figures. In addition to forms, other non-traditional methods can be used for counting enrollment. For example, if during remote learning families have requested “kits”, responded to a survey or phone call to indicate a preference for an electronic medium (e.g., Facebook, Zoom), they can also be considered enrolled. While these are acceptable methods to count enrolled families/students, responding to general inquiries does not mean that they have participated. Therefore, students cannot be automatically counted towards daily attendance solely because of enrollment status.

**Attendance**

We want 21st CCLC attendance to be as accurate and multi-dimensional as possible to better understand the engagement of students in programs. The ability to continue to monitor attendance, as a proxy for engagement, is one of the most important ways 21st CCLC programs can help ensure student learning and wellbeing during a pandemic across any instructional model. The primary rationale for documenting student engagement with high-quality attendance data is the relationship between student attendance and student achievement. With this in mind, programs must continue to strive to meet the 75% of students enrolled in programs for 30 days or more requirement under the grant.

**Tracking Attendance in Distance Learning**

Attempting to track student attendance under remote conditions can be complicated. Determining attendance will require programs to take a close look at enrollment and the activities the program is providing. Attendance is be grouped into two primary categories:

1. Activities and services provided by the 21st CCLC program; and
2. Evidence of engagement by students and families.

**Attendance by Activity Provision**

Sharing of resources and information to students and family members is an important part of supporting 21st CCLC families. This should be done through a variety of mechanisms, which could include, but is not limited to, the program’s website, email, social media posts, and printed materials (e.g., newsletters). Unfortunately, when student/family activities, videos, resources, etc., are posted online (e.g., through social media, emailed to distribution list, etc.), it is very difficult to determine with fidelity whether the enrolled students/family members have accessed these online sources and as a result, attendance cannot be counted. Nevertheless, programs should still document these activities in the activity log (Plan A/B).

However, there are times when programs may count attendance when activities are provided.

**Example:** When a student/family receives a supplemental enrichment kit/worksheets/books/etc. that does not need to be submitted/returned (i.e., optional), count that student/family as part of your daily attendance (count the day that the resource was provided).

**Attendance by Engagement**

21st CCLC programs should purposefully plan to integrate ways in which students can demonstrate meaningful engagement in lessons and activities. Staff should build in as many meaningful opportunities for student interaction and engagement as possible. Engagement can be evidenced for purposes of attendance by any of the following or reasonable equivalents:

* Evidence is provided if an activity has been completed (e.g., completion of a project-based activity or enrichment kit). Programs should count the student/family member as having attended for the full number of days that the activity required; estimate if needed (e.g., 5 days for a week-long activity). Note that evidence can be in the form of a picture/video of completed project, feedback survey about individual projects/provided materials, or other communication from a family member asserting that project was completed.
* Many online platforms have data collection features available, such as: registration features, tracking views and log-ins, soliciting comments, shares, or reactions about activities, tracking individual tutoring sessions, keeping attendance during online meetings (e.g., Zoom, Google Meet, Microsoft Teams, Webex), and online polls or surveys (e.g., asking students to respond to a “question of the day”). Use these features whenever possible to track participation of students and family members.
* Student and family member phone calls, responses to email, or other digital communications that can be easily tracked should also be counted as daily attendance.
* Car parades, home “visits”, or other activities where staff tries to physically connect with students and families should be counted as daily attendance with each student/family visited.

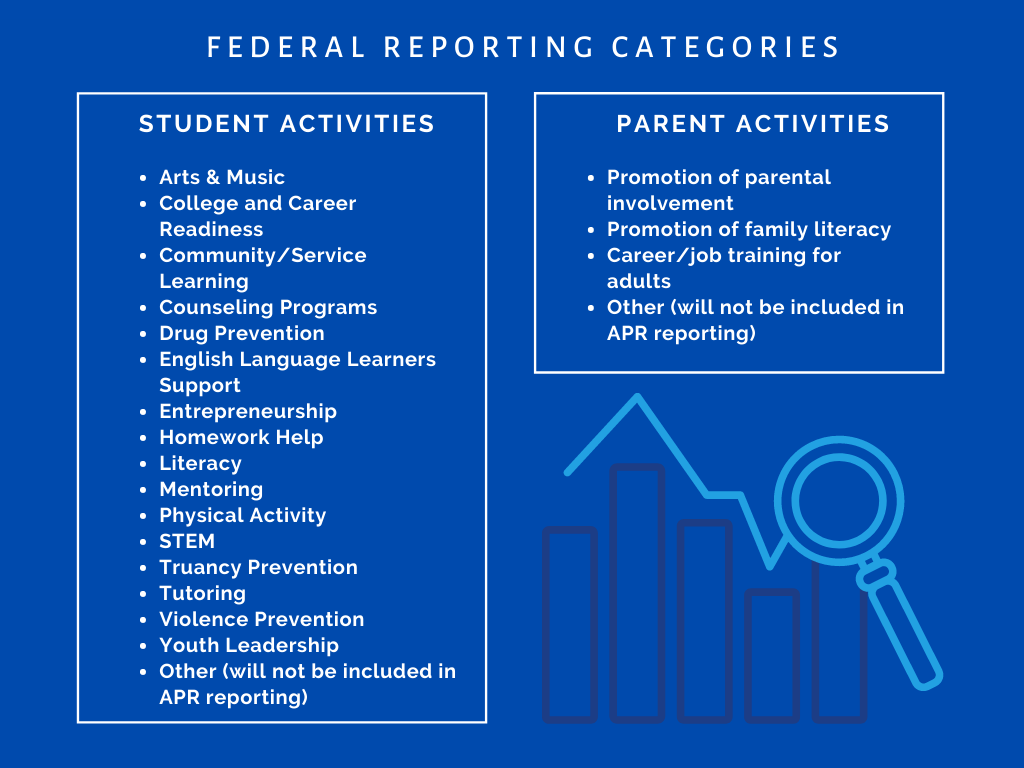
**Tracking Method**

In terms of tracking attendance, programs can choose a method that best fits their needs given available resources. For example, some programs are consolidating their attendance data from multiple collection sources through Google Docs that are accessible to all staff members working remotely to enable staff to work more efficiently to reach students most in need of services. Others use a centralized electronic program (e.g., EZ Reports) that all staff have access to for documenting attendance. Still other programs have contact logs that are shared to a data person, who then aggregates this information. For APR Reporting, it is important that, whichever method is used, it collects all fields in our Student-Family Participation Roster.

**Activities and Hours/Days of Programming**

The 21st CCLC program schedule should include all the days and hours when activities are provided to students and/or their family members. Programs must provide enough activities and services for students and families that would take a minimum of 12 hours in a typical week to complete totaling a minimum of 300 program hours per school year. Programs should strive to create a schedule that includes at least four service days per week and be at least 2 hours per day. This does not include time that staff takes to plan or prepare for activities, professional development, data entry, and other non-service activities; these should be tracked separately via a staff work log.

Allowable activities involving students/families will need to be associated with one of the following categories in order to be counted for federal reporting purposes.

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**Irregular Activities**

It is important that any irregular activities, such as food distribution, is tracked; these should be coded under “Promotion of parental involvement” as programs are providing supports to families through this activity.

**Data Reporting Systems**

**Plan A (Programs who have purchased EZ Reports):** Staff should do the following to document their activities/sessions:

1. Create new sessions that cover any programming that may be occurring (Virtual Tutoring, Homework Help, Arts Kit, Gardening at a Distance, etc.). Programs can also use the “Special Events” option for easy enrollment [note, this feature allows you to enroll a group (e.g., all youth in grades 1-5) to an event/activity at once].

**Important:** Please specify the method in which the activity is being held. If it is being held via Distance Learning, please begin the activity name with “DL” or “Virtual” (latter if it is exclusively online activity). Use the term “In-Person” if it is being held in person. And, use the term “Hybrid” if it is being held in both formats.

1. For students who are participating in these 21st CCLC activities, enroll the appropriate students (if not using “Special Events”) and record attendance for each student who has participated.

**Plan B (Google sheets):** We have added three new columns (Instructional Method, Start Date and End Date) on each sheet under the Student and Adult Activities tabs. Because activities are likely to be varied in terms of frequency and participation, we ask that grantees identify and report all unique activities being conducted, specify the method being employed for each unique activity and provide start/end dates. This is necessary because it may be that activities change over the course of the term (e.g., programs begin as in-person but then switch to Hybrid or Distance Learning), and we need to be able to document all changes that occurred and when. Refer to the updated Plan B Guidance document for additional instructions on how to complete

**Surveys**

21st CCLC programs should plan to implement all evaluation surveys for the 2020-21 school year. This includes the student and caregiver surveys which were optional spring of 2020. Program Directors must directly communicate with the State Evaluator, Miriam Resendez, and ODE for flexibility considerations well before the deadlines of Student and/or Caregiver surveys. The teacher survey and all other evaluation requirements must still be met at this time.

If you have additional scenarios or questions, feel free to contact the 21st CCLC State Evaluator, [Miriam Resendez](mailto:miriam@jemrllc.com), at JEM & R, LLC.

**Required**

* 21st CCLC programs must continue to strive to meet the 75% of students enrolled in programs for 30 days or more requirement under the grant.
* For Distance Learning Instructional Models, attendance tracking must include not only activities and services being offered, but also evidence of student and family engagement.
* For On-Site Instructional Models, prior attendance and reporting practices are unchanged and should meet the requirements described in this section.
* For Hybrid Instructional Models, attendance tracking will include a combination of On-Site and Distance Learning approaches.
* Staff-led allowable activities that do NOT involve students/families (e.g., staff professional development, development of curricula, etc.), should be tracked separately in staff work logs and do not count toward hours of service to students and families
* All evaluation data requirements must be completed according to the 2020-21 timeline. This includes but is not limited to: a) student demographic and attendance data; b) family participation data; c) student and family activities; d) other program data such as operational hours, staffing and partners; e) teacher, student, caregiver, program staff and program administrator surveys; and f) completing an annual evaluation report, program reflection, and action plan.

# Budget

The Coronavirus Aid, Relief, and Economic Security (CARES) Act, enacted March 2020, allowed for limited waivers of some federal program requirements. These waivers, included carryover funds extension for the 2018-19 grant year. 21st CCLC programs that need additional time to expend 2018-19 funds must submit a request using a Carryover Request Form.

| 21st CCLC (Title IV-B) Budget Deadlines and Reporting Requirements | | | | |
| --- | --- | --- | --- | --- |
| Funds | **Final Date for Expenditures** | **Final Claim Date** | **Due Dates** | **Plan Submission Directions** |
| Carryover Funds from 2018-19 (Year 1) | 9/30/2021 (extended one year due to USED waiver) | 11/15/2021 | 11/13/2020 | Complete and submit narrative located in the Carryover Request Form |
| Carryover Funds from 2019-20  (Year 2) | 9/30/2021 | 11/15/2021 | 11/13/2020 | Complete and submit narrative and budget located in the Carryover Request Form |
| 2020-21 Funds  (Year 3) | 9/30/2022 | 11/15/2022 | 11/13/2020 | Complete and submit budget and narrative located in Program Spending Packet for Year 3 funds |

**Required**

* 21st CCLC grantees must submit Program Spending Packet and Budget for 2020-2021 school and any carryover requests for 2018-2019 and 2019-2020 by indicated due dates.

# Use of Funds

**Supplement Not Supplant**

21st CCLC funds must be used only to supplement the level of federal, state, local, and other non-federal funds and not to replace funds that would have been available to conduct activities if 21st CCLC funds had not been available. One way to determine supplanting is to consider the question, “What would have occurred in the absence of the grant?” If alternate funds would have been available, then using grant funds would be considered supplanting.

When considering whether any cost is reimbursable using 21st CCLC funds, it must be allowable, reasonable, necessary, allocable, and adequately documented ([2 CFR Part 200](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=88254c51d2854d2660ef9a3226c545e9&mc=true&n=pt2.1.200&r=PART&ty=HTML#se2.1.200_1408)).

1. **Allowable** (paraphrase of 2 CFR §200.403)**:** Permissible within a set of regulations.
   1. The cost must be necessary and reasonable for the performance of the award and be allocable;
   2. The cost is permissible under the 21st CCLC federal program;
   3. The cost is consistent with the Federal cost principles in 2 CFR Part 200; and
   4. The cost is consistent with an approved program plan and budget, as well as any special conditions imposed on the grant.
2. **Reasonable** (paraphrase of 2 CFR §200.404)**:** As much as is appropriate or fair; moderate.
   1. A prudent person would purchase the item given the price and circumstances
   2. Market prices for comparable goods or services in the area are a good measurement of reasonableness.
3. **Necessary:** Must be essential for the performance or administration of grant.
   1. A program needs this product or service and has already utilized existing resources available.
4. **Allocable** (paraphrase of 2 CFR §200.405)**:** incurred specifically to benefit the population served by the 21st CCLC program.
   1. A cost providing a benefit to the program, being necessary to the overall operation to meet program objectives.
5. **Adequately Documented:** Evidence to monitors, auditors, or other oversight entities of how the funds were spend over the lifecycle of the grant.
   1. Examples include: Itemized lists or receipts, proof of payment, sign-in sheets, certificates of completion, agendas, travel logs, etc.

**Authorized Activities under ESSA**

21st CCLC Funds may be used to carry out a broad array of before and after school activities that advance student academic achievement and support student success, including (ESSA, Sec. 4205(a)):

* Academic enrichment learning programs, mentoring programs, remedial education activities, and tutoring services, that are aligned with the challenging State academic standards and any local academic standard; and local curricula that are designed to improve student academic achievement
* Well-rounded education activities, including such activities that enable students to be eligible for credit recovery or attainment
* Literacy education programs, including financial literacy programs and environmental literacy programs
* Programs that support a healthy and active lifestyle, including nutritional education and regular, structured physical activity program
* Services for individuals with disabilities
* Programs that provide after-school activities for students who are English learners that emphasize language skills and academic achievement
* Cultural programs
* Telecommunications and technology education programs
* Expanded library service hours
* Parenting skill programs that promote parental involvement and family literacy
* Programs that provide assistance to students who have been truant, suspended, or expelled to allow the students to improve their academic achievement
* Drug and violence prevention programs and counseling programs
* Programs that build skills in science, technology, engineering, and mathematics (referred to in this paragraph as `STEM'), including computer science, and that foster innovation in learning by supporting nontraditional STEM education teaching methods
* Programs that partner with in-demand fields of the local workforce or build career competencies and career readiness and ensure that local workforce and career readiness skills are aligned with the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.) and the Workforce Innovation and Opportunity Act (29 U.S.C. 3101 et seq.).

**Requirements**

* The activities and services provided by 21st CCLC programs must align to the goals, purpose and intent of the grant.
* When considering whether any cost is reimbursable using 21st CCLC funds, it must be allowable, reasonable, necessary, allocable, and adequately documented ([2 CFR Part 200](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=88254c51d2854d2660ef9a3226c545e9&mc=true&n=pt2.1.200&r=PART&ty=HTML#se2.1.200_1408)).
* The purchasing of everyday items (e.g., food basics, diapers and cleaning supplies for families) is not allowable with 21st CCLC grant funds.

# Meals

21st CCLC programs are expected to provide snacks/meals through USDA Child Nutrition Programs during typical On-Site program operations. These services support student learning and development for students enrolled in our programs.

The 21st CCLC grant is not designed to fund all anticipated program costs. All programs should pursue opportunities to access other funding sources to cover food costs/after school snacks such as:

* National School Lunch Program-After School Snacks
* Summer Food Service Program
* Child and Adult Care Food Program
* Local Food Banks

**On-Site Instructional Model:** Programs are required to contact their Food/Nutrition Department to determine if they are able to obtain healthy snacks from the National School Lunch Program. Documentation of this must be maintained with the program’s records including the date, person contacted and final resolution. If snacks cannot be provided by the school’s nutrition program and/or local food bank, programs should work to ensure the 21st CCLC program can purchase nutritional snacks that are reasonable and appropriate in cost.

**Distance Learning and Hybrid Instructional Models:** 21st CCLC staff may assist with food distribution during Distance Learning or Hybrid models as long as some type of enrichment activity is included. This could be in the form of packets, informational flyers, activity kits, etc.

**Food Purchase and Programming**

**Cooking Classes:** Food costs associated with culinary classes offered by the 21st CCLC program are allowed. The costs must be reasonable and a requirement of the class curriculum which was part of the approved application and/or submitted to ODE for prior approval. Clear documentation must be maintained that aligns the cooking class with approved project goals and performance measures. All courses involving food costs that were not part of the approved application/budget must receive prior approval by 21st CCLC ODE staff.

**Parent and Family Activities:** Food costs associated with parent and family activities can be covered as long as the food cost is reasonable and appropriate and the activity is directly aligned with the performance measures, goals and activities approved in the program’s grant application. It is important to note that elaborate catered meals are not considered a reasonable and appropriate cost. The food provided at parent and family activities can be provided to staff working the event.

**Field Trips:** Programs should first partner with the school’s food /nutrition department and/or use other funding sources when providing food during day field trips. If partnering with the school’s food/nutrition department or other funding sources is not an option, 21st CCLC funds can be used to pay for a student lunch that is reasonable and appropriate in cost and falls within USDA nutritional guidelines.

**Staff Professional Development:** Food costs associated with staff professional development are not covered by the grant.

**Requirements**

* 21st CCLC programs may support the distribution of meals as long as some type of 21st CCLC enrichment activity is provided during the food distribution. This can be in the form of take-home activity kits, enrichment packets, online class schedules, etc.
* 21st CCLC programs are expected to provide snacks/meals through USDA Child Nutrition Programs during on-site program operations.

# Equipment

21st CCLC programs may distribute 21st CCLC funded equipment and supplies to program participants for use during 21st CCLC remote activities. Further, according to recent USDE guidance, programs may repurpose 21st CCLC funded equipment and supplies to meet the general education needs of students, including students with disabilities and English learners, and the instructional needs of teachers, related services providers, and other educational personnel during the national emergency caused by COVID-19.

21st CCLC programs must maintain appropriate controls over any 21st CCLC equipment and supplies distributed for remote programming. When distributing equipment and supplies, programs must abide by management, tracking and labeling found in the United States Department of Education [Fact Sheet for Repurposing Federal Equipment and Supplies to Combat COVID-19](https://www2.ed.gov/documents/coronavirus/covid19-repurposing-equipment-supplies.pdf) in order to facilitate proper return and continued benefit to the 21st CCLC program. All sites should continue to maintain a detailed list of their fixed assets that includes all equipment purchased for 21st CCLC.

**Required**

* 21st CCLC grantees must abide by management, tracking and labeling of equipment found in the United States Department of Education [Fact Sheet for Repurposing Federal Equipment and Supplies to Combat COVID-19](https://www2.ed.gov/documents/coronavirus/covid19-repurposing-equipment-supplies.pdf) .

# Community and Family Engagement

Engagement is the process of communicating to, learning from and alongside, and collaborating with partners to leverage the unique needs and strengths of the children and their families. It is a process where expertise and resources between multiple community partners can help make a true difference in realizing a shared vision for children and youth in 21st CCLC programs.

**Community Engagement**

As 21st CCLC programs begin to plan for the 2020-21 school year and as they adjust programming throughout the year, programs should actively and authentically engage families, students, staff and community partners in the decision-making process in order to build trust and credibility for any plans that are implemented. Effective stakeholder engagement will:

* Clearly communicate 21st CCLC program goals and objectives;
* Ensure stakeholders understand the purpose of their participation;
* Specify how and when feedback will be used in the decision-making process;
* Reflect back to stakeholders the feedback received to demonstrate the 21st CCLC program has listened;
* Close the loop and strengthen credibility by communicating how feedback was acted upon; and
* Collect feedback multiple times during the year from students and families regarding their experiences as the program shifts services and provides varied instructional models throughout the year.

Programs should consider and seek opportunities for partnership with each of the following groups for stakeholder, tribal, and community engagement:

* Indian education (Title VI)
* Migrant education
* Title I parent groups
* STEM Hubs
* CTE Regional Coordinators and leaders
* Local business community
* Community college and university partners
* Culturally specific and community-based organizations
* Tribal representatives
* Other regional collaboratives, such as Early Learning hubs

**Family Engagement**

21st CCLC programs must provide adult family members of students served opportunities for active and meaningful engagement in their children’s education, including opportunities for literacy and related educational development. Programs should strive to maintain and continue to develop positive, on-going connections with families.

The COVID-19 pandemic has created intense stress for the families we serve. Effective and transparent two-way communication is especially important during this time. 21st CCLC programs should develop a communication plan in advance of reopening for fall.

Communication strategies leading up to fall programming should:

* Emphasize the safety measures undertaken by the 21st CCLC program;
* Include information about personal protective equipment (PPE) for students, teachers, and staff, cleaning and sanitization protocols, physical distancing measures, and mental health and well-being supports;
* Emphasize the importance of symptom onset and keeping students home when sick;
* Pickup and drop-off instructions;
* Outline service models (On-Site, Hybrid, Distance Learning);
* Set a predictable time when communication will be sent, such as a weekly newsletter or video announcements;
* Provide communication support to families in preferred home language; and
* Discuss important routines and school structures, including supplemental learning resources, how to access meals, and what community supports and services are available for families.

**Required**

* Engage families as critical partners in designing and implementing 21st CCLC services and processes to meet student needs and support student growth.
* Communicate with parents, caregivers, and youth prior to reopening programs to communicate safety information and key programmatic information.
* Provide clear and consistent communication to support families and caregivers of 21st CCLC students throughout the school year.
* Provide adult family members of students served opportunities for active and meaningful engagement in their children’s education, including opportunities for literacy and related educational development.
* Meet with Stakeholder groups at least twice during the 2020-21 school year.

# Tribal Consultation

Tribal Consultation is a separate process from stakeholder engagement; consultation recognizes and affirms tribal rights of self-government and tribal sovereignty. All school districts receiving Title Grant Awards of any kind, not solely Title VI, are required to consult with tribal organizations. 21st CCLC (Title IV-B) grantees must coordinate with school districts to ensure meaningful on-going tribal communication regarding 21st CCLC programming affecting American Indian and Alaska Native students. Information on the tribes including contact information is available on the [Oregon Tribal page](https://www.oregon.gov/ode/students-and-family/equity/NativeAmericanEducation/Pages/Oregon-Tribal-Websites.aspx).

**Required**

* Coordinate with school districts to ensure meaningful on-going tribal communication regarding 21st CCLC programming affecting American Indian and Alaska Native students.
* Provide ongoing, timely communication regarding changes 21st CCLC programming status during shifts in instructional model.

**Recommended**

* Create and incorporate Indigenous community voices and appropriate practices into curriculum to make material accessible and engaging for Native American youth, students, and families.

# Staff

Staff may continue to be paid with 21st CCLC grant funds for work, including remote work at the discretion of the local programs, in service to 21st CCLC program goals. Oregon 21st CCLC programs are encouraged to continue to pay all staff for their efforts to alleviate potential financial instability and hardship for employees.

**Allowable work includes:**

* Creating and/or providing Distance Learning opportunities specific to the 21st CCLC program for students and families that complements but does not duplicate the regular school day;
* Virtual staff meetings (e.g., conference calls, Zoom meetings, Skype);
* Curriculum work specific to the 21st CCLC program;
* Lesson plan development specific to the 21st CCLC program;
* 21st CCLC program data entry or validation;
* Online professional development;
* Systems planning work (e.g., summer programs, evaluation, sustainability, safety, budgeting);
* Services related to providing federally approved afterschool meals or snack programs;
* Other expectations and associated job tasks listed in job descriptions that are reasonable and necessary during the closure period.

**Required**

* Staff who are teleworking in accordance with established written policies must maintain time and effort records to document time spent working on duties related to 21st CCLC programs.
* Employee timesheets must correspond with student attendance rosters for direct instruction.
* Employees who are teleworking and who had former permanent set schedules may no longer be working those same schedules. If current work and time schedules have changed, time and effort records should indicate such changes during the distance learning time to document proper use of federal dollars.
* Final approval of work and work protocols are the responsibility of subgrantee local supervisors.
* Hours worked should remain commensurate to need and subject to supervisor approval.
* Employees in at-risk categories or who have an at-risk member of their household cannot be required to physically report to a worksite. They may be assigned duties through telework or work-at-home.
* USDE April 8, 2020 Guidance states: *“an employee who is being paid with Department grant funds while the program grant activities are closed in whole or in part due to the COVID-19 pandemic may not also be paid for the time during which the program is closed by the organization or another organization for working on other activities that are not closed down.”*
* Coordinate on-going staff training and communication mechanisms to ensure cohesive health and safety protocols and alignment to changing instructional models and goals.

**Recommendations**

* + Encourage staff to update contact information, verify the health and safety of employee and employee families, and communicate to staff a return-to-work plan at the beginning of the school year and/or at other necessary returns. Work with your human resources department and/or local school attorneys.
  + Review an alternative command structure if administrative and/or key employees are unable to work.
  + Review policies and procedures included in handbooks to provide more flexibility and remove punitive measures for absences when there is determined illness, a localized outbreak, or exposure to a contagious disease.
  + Review staff daily schedules to provide adequate time for handwashing, sanitizing desks, and other good hygiene practices.
  + Review and revise job descriptions for appropriate duties for any future school closures.

# Monitoring

21st CCLC programs should focus on responding to the needs of their students, families, and communities and providing high quality programming with brand new instructional models this fall. It is yet to be determined what monitoring will look like this year. If monitoring does occur, all activities will take place in spring and grantees will be notified well in advance.

# Equitable Services

21st CCLC grantees must provide equitable services to private school students and their families. In designing a program that meets this requirement, 21st CCLC programs must provide comparable opportunities for the participation of both private and public school students who reside in the area served by the 21st CCLC program.

**Consultation**

21st CCLC programs must conduct timely and meaningful consultation with private school officials during the design and development of the 21st CCLC program on issues such as how the children's needs will be identified and what services will be offered. Services and benefits provided to private school students must be secular, neutral, and non-ideological. Meaningful consultation involves communication and discussions between Local Education Agencies (LEAs) and private school officials on key issues that are relevant to the equitable participation of eligible private school students, teachers, and other education personnel in ESSA programs. Meaningful consultation provides a genuine opportunity for all parties to express their views, to have their views seriously considered, and to discuss viable options for ensuring equitable participation of private school students, teachers, and other education personnel. The goal of all parties should be to reach an agreement on how to provide equitable and effective programs for eligible private school children. Adequate notice, at least three weeks prior, of such consultation is critical in ensuring meaningful consultation and the likelihood that those involved will be well prepared with the necessary information and data for decision making.

The fiscal agency is responsible for planning, designing, and implementing the 21st CCLC program and shall not delegate that responsibility to the private school. Through the consultation process, the fiscal agency must design a coordinated program with services that meet the needs of the private school and its students. Regulatory requirements for consultation include eight topics that must be included on the initial agenda and are topics that must be addressed annually and on-going through the school year.

1. How the eligible private school children’s needs will be identified.
2. What services will be offered to eligible private school children.
3. How, where and by whom the services will be provided.
4. How the services will be assessed and how the results of the assessment will be used to improve services.
5. The size, scope of the equitable services to be provided to the eligible private school children, teachers and other eligible personnel, the amount of funds available for those services and how that amount is determined.
6. How and when the agency will make decisions about the delivery of services, including a thorough consideration and analysis of the views of the private school officials on the provision of services through third-party providers.
7. Whether to provide equitable services to eligible private school participants: (1) by creating a pool or pools of funds with all of the funds allocated under programs covered under section 8501(b); or (2) on a school-by-school basis based on each of the proportionate share of funds available to provide service in each school.
8. The method, or sources, of data used to determine the number of private school children from low-income families residing in attendance areas. [ESSA, sec. 8501 (c)]

**Required**

* 21st CCLC programs must maintain documentation available upon request from ODE that includes written affirmation of each participating private schools annually and throughout the life of the grant.

# Appendix

## 21st CCLC Best Practices for Safe Virtual Programming

1. Choose a suitable platform from a reputable company that is registered and operated in the United States. Take time to learn what sort of information a platform collects from participants and what they do with that information once collected. This will ensure that participant information is not being used elsewhere or sold to third parties.
2. Select one or two platforms that you will use exclusively for your program and ensure that families have viewed privacy policy, terms and conditions and have granted permission for their student to actively engage. It is best to align platforms with schools and districts so students and families can focus on content rather than learning new systems.
3. Prohibit staff from meeting with students one-on-one and require two staff members to co-facilitate activities.
4. Maintain control of the video conferencing features. Program staff should be able to control participants’ ability to mute/unmute, share screens, and enable/disable private chat between participants.
5. Obtain permission from parents/guardians to record sessions and ensure that recordings that will be published online will not include proprietary information of students (first/last names, locations, pictures/videos of their faces, etc.)
6. Limit who can join a meeting by not publicly advertising the event and sticking to invitation only, and by requiring participants to enter a unique code to join the meeting. Programs should lock down their own login information for virtual conference accounts by having strong passphrases for the account and limit who has access to that account. If possible, enable multifactor authentication if the platform offers it.
7. Create a standard of conduct specifically for online behavior that your participants will sign, laying out guidelines for appropriate chat conversations and behavior in meetings.
8. Maintain appropriate boundaries between staff, participants and families by ensuring that staff contact students only through official program channels (such Zoom, Email, Google Voice, etc.) and vice versa.
9. Encourage participants to create a background or sit in front of a blank wall to create a neutral background for themselves and ensure privacy for other family members.
10. Pay close attention to [FERPA, COPPA, CIPA, and OSIPA](https://plconnect.ciesc.org/navigating-ferpa-coppa-cipa/) laws and also look specifically for references to how student data is used.



April 8, 2020

## Fact Sheet:

## Select Questions Related to Use of Department of Education Grant Funds During the Novel Coronavirus Disease 2019

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This fact sheet responds to frequently asked questions related to the use of grant funds from the U.S. Department of Education during the novel Coronavirus Disease 2019 (COVID-19) with respect to compensation, travel, and conference costs that are otherwise allowable costs under applicable program statutes and regulations. If you have additional questions or comments related to these questions and answers, please contact your Department program officers or send your questions to the following email address: COVID-19@ed.gov.

1. **May a grantee or subgrantee continue to pay the compensation of an employee paid with grant funds from the Department during the period the employee is unable to work because his or her organization is closed due to novel Coronavirus Disease 2019 (COVID-19)?**

Yes. Generally, a grantee or subgrantee may continue to charge the compensation (including but not necessarily limited to salaries, wages, and fringe benefits) of its employees who are paid by a currently active grant funded by the Department to that grant, consistent with the organization’s policies and procedures for paying compensation from all funding sources, Federal and non-Federal, under unexpected or extraordinary circumstances, such as a public health emergency like COVID-19.[1] Thus, if the organization pays, consistent with its policies and procedures, similarly situated employees whose compensation is paid with non-Federal funds during an extended closure, those paid with grant funds from the Department may also continue to be paid.[2] However, an employee who is being paid with Department grant funds while the program grant activities are closed in whole or in part due to the COVID-19 pandemic may not also be paid for the time during which the program is closed by the organization or another organization for working on other activities that are not closed down.

If a grantee or subgrantee does not currently have in place a policy that addresses extraordinary circumstances such as those caused by COVID-19, the grantee or subgrantee may amend or create a policy in order to put emergency contingencies in place for Federal and non-Federal similarly situated employees. If the conditions exist for charges to be made to the Federal grant, charges may also be made to any non-Federal sources that are used by a grantee or subgrantee in order to meet a matching requirement.

1. *See* Office of Management and Budget (OMB) Memorandum M-20-17, [https://www.whitehouse.gov/wpcontent/uploads/2020/03/M-20-17.pdf.](https://www.whitehouse.gov/wp-content/uploads/2020/03/M-20-17.pdf)
2. 2 CFR §§ 200.403(c) (allowability of costs), 200.404 (reasonable costs), 200.405 (allocable costs), 200.430(b) (compensation for personal services), and 200.431(a)-(b) (fringe benefits).

A grantee and subgrantee must maintain appropriate records and cost documentation as required by [2 CFR § 200.302](https://www.ecfr.gov/cgi-bin/text-idx?SID=4aa24dcf2aea16839f2318de64e2ab7f&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1302) (financial management), [2 CFR § 200.430(i)](https://www.ecfr.gov/cgi-bin/text-idx?SID=4aa24dcf2aea16839f2318de64e2ab7f&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1430) (standards for documenting personnel expenses), and [2 CFR § 200.333](https://www.ecfr.gov/cgi-bin/text-idx?SID=4aa24dcf2aea16839f2318de64e2ab7f&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1333) (retention requirements for records) to substantiate the charging of any compensation costs related to interruption of operations or services.

At the same time, recipients should consider ways that employees paid with grant funds can support continuing activities, including distance learning opportunities for students served by the grant.

2. **If a conference, training, or other activity related to a grant from the Department is cancelled due to COVID-19, may grant funds be used to reimburse nonrefundable travel (e.g., conveyance or lodging) or registration costs that were properly chargeable to the grant at the time of booking?**

Yes, provided that a grantee or subgrantee first seeks to recover nonrefundable costs (e.g., travel, registration fees) associated with a grant from the Department from the relevant entity that charged the fee (e.g., airline, hotel, conference organizer). Some businesses are offering flexibility with regard to refunds, credits, and other remedies for losses due to the COVID-19 outbreak. Moreover, many agreements or contracts for conferences, training, or other activities related to a grant contain an emergency or “act of God” provision, and the grantee and its subgrantees must seek to exercise those clauses to the extent possible in light of the COVID-19 outbreak.

If a grantee or subgrantee is unable to recover the costs, the grantee or subgrantee may charge the appropriate grant for the cancellation costs, provided the costs were reasonable and incurred in order to carry out an allowable activity under the grant, consistent with the Federal cost principles described in [2 CFR Part 200 Subpart E of the *Uniform Administrative Requirements, Cost Principles, And Audit Requirements For Federal Awards*](https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl) (Uniform Guidance).

Grantees and subgrantees should not assume additional funds will be available should the charging of cancellation or other fees result in a shortage of funds to eventually carry out the event or travel. Grantees and subgrantees must maintain appropriate records and cost documentation as required by 2

CFR § 200.302 (financial management)and 2 CFR § 200.333 (retention requirements for records)to substantiate the charging of any cancellation or other fees related to the interruption of operations or services.

3. **If a grantee or subgrantee is planning future travel under a grant from the Department, may it purchase travel insurance with grant funds?**

Due to health concerns related to COVID-19, grant-supported travel generally should not be occurring. However, if travel is permitted by Federal, State, and local directives and is the only means to carry out an essential grant function that must be undertaken on a time-sensitive basis during the COVID-19 pandemic, consistent with the grantee’s or subgrantee’s travel policy, travel insurance is allowable provided the cost is reasonable and allocable to the grant consistent with the Federal cost principles described in 2 CFR Part 200 Subpart E of the Uniform Guidance.

## Secure File Transfer Instructions

To be used for any student specific data, and/or large files. Anyone who has access to the district site can use this transfer feature.

Link to site:

<https://district.ode.state.or.us/home/>

On home page, on right side, under Quick Links:

Click on “Secure File Transfer” (third link from the bottom of the list).

Enter who is to receive the document – either:

ODE from the list at the top left of this page,

**or**

Outside Recipients

Fill in each section of this page; - enter

Your email address

Upload file you want to send

Enter any message you wish

Then click the “send file” button

The site automatically sends an email to the recipient(s) that includes a link to the log-in page the recipient must go to open the file.

NOTE:

If you are the ‘recipient’, the file will expire after 7 days. If you want to keep the data, be sure to save it.

If you are the ‘sender’, only 1 file can be sent at a time.

## Important Links

**Essential Links**

[Oregon Department of Education COVID-19 Resources](https://www.oregon.gov/ode/students-and-family/healthsafety/Pages/COVID19.aspx)

[Oregon Health Authority COVID-19 Website](https://govstatus.egov.com/OR-OHA-COVID-19)

[Governor Kate Brown’s COVID-19 Page](https://govstatus.egov.com/or-covid-19)

[Metrics for Reopening](https://app.powerbi.com/view?r=eyJrIjoiZDYzZTBjMzktYTAxNi00YmEwLWJkMjEtNDIxODVmNjFjOTM1IiwidCI6ImJkMjNhMzUwLWE4Y2ItNDFmNS04YmZlLWJhZDgzOTEwYzE5MyJ9&utm_medium=email&utm_source=govdelivery)

**ODE Guidance Documents**

[Ready Schools, Safe Learners Guidance for School Year 2020-21](https://www.oregon.gov/ode/students-and-family/healthsafety/Documents/Ready%20Schools%20Safe%20Learners%202020-21%20Guidance.pdf)

[Comprehensive Distance Learning A Companion to Ready Schools, Safe Learners](https://www.oregon.gov/ode/students-and-family/healthsafety/Documents/Comprehensive%20Distance%20Learning%20Guidance.pdf)

[Planning for COVID-19 Scenarios in Schools](https://www.oregon.gov/ode/students-and-family/healthsafety/Documents/Planning%20and%20Responding%20to%20COVID-19%20Scenarios%20in%20Schools%20August%202020.pdf)

[Ensuring Equity and Access](https://www.oregon.gov/ode/students-and-family/healthsafety/Documents/Ensuring%20Equity%20and%20Access%20Aligning%20State%20and%20Federal%20Requirements.pdf)

**Programmatic Resources**

[Y4Y Reaching Out to Families](https://y4y.ed.gov/uploads/media/138_FE_Reaching_Out_to_Families.pdf)

[Activities for Managing Stress](https://y4y.ed.gov/uploads/media/Activities_Practices_Final.pdf)

[Building Culturally Responsive and Inclusive Programming in 21st CCLC](https://y4y.ed.gov/webinars/21st-cclc-sea-technical-assistance-webinars/building-culturally-responsive-and-inclusive-programming-in-21st-cclc/)

**Teaching About COVID-19- Activities for Students**

[The Global Classroom with the Smithsonian Science Education Center COVID-19](https://www.si.edu/object/global-classroom-smithsonian-science-education-center-covid-19:yt_bOKmc83II2I)

[Smithsonian Science Education Center- Curriculum](https://ssec.si.edu/COVID-19)

[Using the COVID-19! How Can I Protect Myself and Others Module](https://www.si.edu/object/using-covid-19-smithsonian-science-global-goals-module-home-or-school:yt_DpPoy7iCGUw)

## 21st CCLC Programmatic Requirements At-A-Glance for 2020-2021 SY

**21st CCLC Operational Blueprints**

All 21st CCLC programs must make their Operational Blueprint available to the community on the program or district website.

Each 21st CCLC grantee must submit a separate Operational Blueprint for each site/center.

Blueprints must be submitted to ODE as a Word document via Secure File Transfer (instructions located in Appendix) to [**Leslie Casebeer**](mailto:leslie.casebeer@state.or.us)before the start of fall programming or no later than October 12, 2020, for the 2020-21 school year.

21st CCLC programs are expected to update this document on a monthly basis *if* changes have been made to any element of program delivery (e.g., program location, hours, instructional model, etc.).

**Time and Duration of Services**

Begin services no later than October 12, 2020.

Coordinate 21st CCLC services with the school(s) from which the center draws its students, districts, and partnering organizations.

On-site services must equal a minimum of 12 hours in a typical week, or equal four service days per week, be open at least 2 hours a day totaling a minimum of 300 program hours per school year.

Distance Learning or Hybrid services must provide enough activities and services for students and families that would take a minimum of 12 hours in a typical week to complete totaling a minimum of 300 program hours per school year. Programs should strive to create a schedule(s) that includes at least four service days per week and be at least 2 hours a day.

Programs must have all of the following in place before providing in-person services.

* Required Community Health Metrics have been met ([Ready Schools, Safe Learners](https://www.oregon.gov/ode/students-and-family/healthsafety/Documents/Ready%20Schools%20Safe%20Learners%202020-21%20Guidance.pdf), Section 0, pages 17-24);
* Health and safety requirements have been met ([Ready Schools, Safe Learners](https://www.oregon.gov/ode/students-and-family/healthsafety/Documents/Ready%20Schools%20Safe%20Learners%202020-21%20Guidance.pdf), Sections 1-3, pages 24-55);
* Operational Blueprints and 21st CCLC Reentry Plans have been submitted to ODE and available to the public;
* Health and safety processes and procedures are fully in place and ready to be implemented;
* Staff have received the necessary health and safety training;
* Families and caregivers have been notified, and plans for health and safety protocols shared.

**Health and Safety Requirements**

All health and safety requirements have been met in sections 0-3 of RSSL and Section 3 in 21st CCLC Operational Blueprints before the start of any in-person programming.

**Cohorting**

To the extent practicable, school-based 21st CCLC programs must apply the same cohorting structures as the school day in which they provide services.

To the extent practicable, 21st CCLC programs serving students from multiple feeder schools must make every effort to align to the Operational Blueprints from each school to:

* + Maintain stable cohorts of students;
  + Provide common health and safety protocols that meet requirements in Sections 0-3 of RSSL guidance; and
  + Provide supplemental services to support varied school instructional models and schedules.

**Instructional Models**

All 21st CCLC programs must be able flexibly adjust between Instructional Models (Distance Learning, On-Site, Hybrid) for the 2020-2021 school year to meet evolving health conditions.

**Program Quality**

21st CCLC must provide coordinated and complementary activities and services aligned to the school day and grant goals regardless of the Instructional Model being implemented.

Federal Supplement not Supplant provisions remain in full effect.

**Physical Location**

If a program is considering a change or an addition to the physical location of a center, it must be approved by ODE before services begin.

**Transportation**

If providing On-Site services, 21st CCLC programs must offer students a means of transport if they qualify for the program and are unable to walk.

If transportation costs include the delivery of meals and educational materials to students’ homes, this cost needs to be documented in the 21st CCLC 2020-21 Budget.

**Student Recruitment and Retention**

21st CCLC must actively work to recruit and retain students into programs until enrollment goals are met.

21st CCLC must prioritize students who are historically underserved, differentially impacted by the virus, or in need of additional support.

**Data Tracking and Evaluation**

21st CCLC programs must continue to strive to meet the 75% of students enrolled in programs for 30 days or more requirement under the grant.

For Distance Learning Instructional Models, attendance tracking must include not only activities and services being offered, but also evidence of student and family engagement.

For On-Site Instructional Models, prior attendance and reporting practices are unchanged and should meet the requirements described in this section.

For Hybrid Instructional Models, attendance tracking will include a combination of On-Site and Distance Learning approaches.

Staff-led allowable activities that do NOT involve students/families (e.g., staff professional development, development of curricula, etc.), should be tracked separately in staff work logs and don’t count toward hours of service to students and families

All evaluation data requirements must be completed according to the 2020-21 timeline.

This includes but is not limited to: a) student demographic and attendance data, b) family participation data, c) student and family activities, d) other program data such as operational hours, staffing and partners, e) teacher, student, caregiver, program staff and program administrator surveys, and f) completing an annual evaluation report, program reflection, and action plan.

**Budget**

21st CCLC grantees must submit Program Spending Packet and Budget for 2020-2021 school and any carryover requests for 2018-2019 and 2019-2020 by indicated due dates.

**Use of Funds**

The activities and services provided by 21st CCLC programs must align to the goals, purpose and intent of the grant.

When considering whether any cost is reimbursable using 21st CCLC funds, it must be allowable, reasonable, necessary, allocable, and adequately documented ([2 CFR Part 200](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=88254c51d2854d2660ef9a3226c545e9&mc=true&n=pt2.1.200&r=PART&ty=HTML#se2.1.200_1408)).

The purchasing of everyday items such as food basics, diapers and cleaning supplies for families is not allowable with 21st CCLC grant funds.

**Meals**

21st CCLC programs may support the distribution of meals as long as some type of 21st CCLC enrichment activity is provided during the food distribution. This can be in the form of take-home activity kits, enrichment packets, online class schedules, etc.

21st CCLC programs are expected to provide snacks/meals through USDA Child Nutrition Programs during on-site program operations.

**Equipment**

21st CCLC grantees must abide by management, tracking and labeling of equipment found in the United States Department of Education [Fact Sheet for Repurposing Federal Equipment and Supplies to Combat COVID-19](https://www2.ed.gov/documents/coronavirus/covid19-repurposing-equipment-supplies.pdf).

**Community and Family Engagement**

Engage families as critical partners in designing and implementing 21st CCLC services and processes to meet student needs and support student growth.

Communicate with parents, caregivers, and youth prior to reopening programs to communicate safety information and key programmatic information.

Provide clear and consistent communication to support families and caregivers of 21st CCLC students throughout the school year.

Provide adult family members of students served opportunities for active and meaningful engagement in their children’s education, including opportunities for literacy and related educational development.

Meet with Stakeholder groups at least twice during the 2020-21 school year.

**Tribal Consultation**

Coordinate with school districts to ensure meaningful on-going tribal communication regarding 21st CCLC programming affecting American Indian and Alaska Native students.

**Staff**

Staff who are teleworking in accordance with established written policies must maintain time and effort records to document time spent working on duties related to 21st CCLC programs.

Employee timesheets must correspond with student attendance rosters for direct instruction.

Employees who are teleworking and who had former permanent set schedules may no longer be working those same schedules. If current work and time schedules have changed, time and effort records should indicate such changes during the distance learning time to document proper use of federal dollars.

Final approval of work and work protocols are the responsibility of sub-grantee local supervisors.

Hours worked should remain commensurate to the need and supervisor approval.

Employees in at-risk categories or who have an at-risk member of their household should not be required to physically report to a worksite. They may be assigned duties through telework or work-at-home.

USDE April 8, 2020 Guidance states: *“an employee who is being paid with Department grant funds while the program grant activities are closed in whole or in part due to the COVID-19 pandemic may not also be paid for the time during which the program is closed by the organization or another organization for working on other activities that are not closed down.”*

Coordinate on-going staff training and communication mechanisms to ensure cohesive health and safety protocols and alignment to changing instructional models and goals.

**Equitable Services**

21st CCLC programs must maintain documentation available upon request from ODE that includes written affirmation of each participating private schools annually and throughout the life of the grant.