21ST CCLC NEW DIRECTOR'S TOOLKIT

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Prepared for the US Department of Education, 21st CCLC by Global Evaluation & Applied Research Solutions, Inc. (GEARS)

Contents

I. Introduction

Overwhelmingly, 21st CCLC State Directors[1] have expressed the need for a toolkit for when new state directors start out in the complex job of overseeing a 21st Century Community Learning Center (21st CCLC) program. In response to this request, the 21st CCLC program office at ED has directed Global Evaluation & Applied Research Solutions (GEARS) to develop this 21st CCLC New Director's Toolkit to bring together content focused on the key tasks of state level directors.

In order to gather the relevant information for this document, seasoned state directors were interviewed in May and June 2017 to identify critical areas for early success, program priorities and challenges new directors face. In addition, state directors were asked to address specific topic areas around monitoring, evaluation, RFP development and competition management, support for subgrantees, and fiscal and allocation requirements. State directors identified four overarching areas as keys to early success for new directors.

Build Relationships

The importance of building a network of support was unequivocal. State directors were unanimous in the value they derived from their relationships with their peer directors. Because they often saw themselves as islands in their state doing this work, relationships emerged as the number one key to success for a 21st CCLC State Director

We heard from state directors that focusing on developing a support network early on was critical to future success. In particular, current state directors emphasized the importance of engaging with their peer state directors and afterschool network colleagues across the country by attending the Summer Institute, annual conferences, national and regional SEA meetings and conference calls.

In addition, state directors expressed the need for new directors to build relationships with other critical constituencies including grantees, federal program officers, fiscal partners in their state, technical assistance and other contracted providers, and local, regional and national afterschool networks. They suggested joining as many list serves, newsletters and other afterschool affiliations as possible, such as Y4Y, Weikart Center, NIOST, NAA, and Beyond School Hours.

Current state directors also suggested that new directors visit their subgrantees to get to know them and their programs, to try to understand who the grantees are, what they are trying to do and their expectations. State directors emphasized that new directors should make it clear the visit is not for monitoring purposes, but rather an opportunity to learn and understand the program and its experiences and challenges. New directors should spend a lot of time in the field getting to know and listening to their subgrantees.

Understand the Foundations of the 21st CCLC Program

Given the complexity of the 21st CCLC program, state directors stressed the importance for new directors to familiarize themselves early on with the details of the authorizing statutes and other non-regulatory guidelines. They recommended strongly that new directors know and read the Every Student Succeeds Act (ESSA) and all of the rules, regulations and guidance provided by the federal

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[1] For consistency, the term state director is used throughout this document to refer to the person in charge of each state's 21st CCLC program.

government, especially those related to monitoring, evaluation, RFPs, fiscal allocations and subgrantee program requirements. State directors emphasized that the 21st CCLC program is complicated; therefore, one of the biggest challenges for new directors is getting up to speed on all of the complexities.

State directors emphasized that one of the first tasks new directors should accomplish is to make sure they have a clear understanding of all of the regulatory obligations and internal processes for ensuring money is being allocated correctly, understanding the business side of administering the 21st CCLC in the state as well as the requirements of the federal government.

State directors also advise new directors to read anything their predecessors left behind in terms of state specific practices, contracts, manuals, and guidance to grantees, (although they acknowledged that there can be an unclear trail of written material available). They recommend that new directors tread lightly on monitoring and making changes in their first few months. Once new directors have learned and understand the governing laws and guidance, they are in a better position to recommend program changes going forward.

Planning Evaluation

While states must develop a summative evaluation focused on potential program impact on students' test scores, behavior and attendance, seasoned state directors suggest that new directors also think about building an evaluation system that includes a process evaluation. Once new directors understand the regulatory obligations and the ways that business gets done in the state, especially what programs are doing in the field and how that is having an impact on children, new directors can start to build an evaluation system to ensure that programs are running the way directors thought they would and that any necessary adjustments can be made going forward. Whether the state evaluation will be conducted by an internal staff person or by a contracted vendor, experienced directors advise setting up meetings with the evaluator early in a new director's tenure to determine the scope, timing, data collection, and other requirements of the evaluation.

II. Overview of Legislation, Regulations, and Guidance

Legislation, Regulations, and Guidance

Legislation

Program Authority: Title IV, Part B of the ESEA, as amended by the Every Student Succeeds Act (ESSA) (20 U.S.C. 7171-7176). The authorizing legislation can be found at ESEA Act of 1965 (see pages 233 through 244 of the legislation).

Regulations

Final regulations to implement Executive branch policy that, within the framework of constitutional church-state guidelines, religiously affiliated (or "faith-based") organizations should be able to compete on an equal footing with other organizations for funding by the U.S. Department of Education are available. View the final regulations compiled by the Center for Faith Based and Neighborhood Partnerships

Uniform Guidance

Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards was published in the Federal Register (79 Fed. Reg. 75871) on December 19, 2014, and became effective for new and continuation awards issued on or after December 26, 2014. Please note the new regulations do not affect grant funds awarded prior to December 26, 2014, unless funds made available under those grants are carried forward into a new Federal fiscal year or a continuation grant.

Non-Regulatory Guidance
21st Century Community Learning Centers Non-Regulatory Guidance (February 2003)
PDF (757K)

ESSA
The Every Student Succeeds Act (ESSA) was signed by President Obama on December 10, 2015. ESSA will be implemented School Year 2017-18. Sign up to receive email updates on ESSA and visit the ESSA website for additional information, as it becomes available: Every Student Succeeds Act (ESSA). Also, check the 21st CCLC website periodically for updates at 21st CCLC Legislation, Regulations, and Guidance.

New Provisions under ESSA

This section highlights program changes under ESSA that are important that need to be addressed by SEA policies.

Expanded Learning Time (ELT) Subawards

Under ESSA, a State may choose to offer ELT subawards in accordance with SEC. 4204 (2) EXPANDED LEARNING PROGRAM ACTIVITIES.—A State that receives funds under this part for a fiscal year funds under section 4202(c)(1) to support those enrichment and engaging academic activities described in section 4205(a) that— (A) are included as part of an expanded learning program that provides students at least 300 additional program hours before, during, or after the traditional school day; (B) supplement but do not supplant regular school day requirements; and (C) are carried out by entities that meet the requirements of subsection (i).

Each SEA should have a policy in place that explains the ELT policy and communicates the funding options available to subgrantees and potential applicants.

Subgrant Renewability

New under ESSA, Section 4204(j) RENEWABILITY OF AWARDS.—A State educational agency may renew a subgrant provided under this part to an eligible entity, based on the eligible entity's performance during the preceding subgrant period.

States may renew subawards at the end of the initial performance period should those programs meet SEA-determined criteria. Renewability may be offered one time for up the same number of years as the original subaward. SEAs should have a written policy that includes the renewal process and the criteria that will determine the renewal.

If the SEA chooses not offer renewability, the SEA should also have a written policy in place that explains the SEA's decision.

Relevant SEA Examples and Resources

- Pennsylvania Renewability Guidance 7-12-17

State-Approved List of External Organizations

New under ESSA, States are expected to develop approved lists of nonprofit organizations that can support 21st CCLC subgrantees.

Section 4202(a)(3) "STATE ACTIVITIES.—A State educational agency may use not more than 5 percent of the amount made available to the State under subsection (b) for the following activities: (I) Providing a list of prescreened external organizations, as described under section 4203(a)(11)"

Section 4203 (a) "IN GENERAL.—In order to receive an allotment under section 4202 for any fiscal year, a State shall submit to the Secretary, at such time as the Secretary may require, an application that— (11) describes how the State will— (A) prescreen external organizations that could provide assistance in carrying out the activities under this part; and (B) develop and make available to eligible entities a list of external organizations that successfully completed the prescreening process."

SEAs are responsible for developing the application process and criteria SEAs will determine the frequency of updating the organization list . SEAs are expected to make the list publicly available.

Relevant SEA Examples and Resources

- New Jersey External Organization Profile
- Vermont External Organization Profile Release
- Wyoming External Organization Profile Survey Questions

III. Building Relationship with Program Officer and Determining Grant Allocations

Getting to know your key players (contractors, subgrantees, people in your agency you may be working with) is critical. One of the first things that are going to happen when you begin your role is someone, you or someone above you or in your agency, is going to go into the federal system and update the contact information. So there may be communication with the federal office at that point. It makes sense to set up a meeting with the federal program officer as soon as possible to get to know each other. The administrator transitioning out of the role may set that up for you. What might happen during that first meeting is to give a status report, see if there are any questions, ask for an update on recent happenings and learn about SEA director meetings, any upcoming conferences, or TA opportunities. Each state is probably going to have their own preference in how they communicate with the federal office. Establishing that line of communication would be important for a new director.

Experienced state directors noted that it is helpful from the start for a new director to gather documentation from prior awards and to understand the process at his/her agency when entering in to discussion with internal grants division or fiscal department staff. It is clear that there are certain percentages of each annual award that need to go toward certain tasks. Working closely with the internal fiscal or financial lead staff will ensure that a new state director embarks on a process that will be maintained through the year and engages in forward planning to ensure compliant and successful budgeting results.

Helpful Information

Grant Allocations (ESSA Sec. 4202):

Subgrants
The State must provide not less than 93 percent of its 21st CCLC funds for subgrants to eligible entities.

State Administration
A State may reserve up to 2% of its 21st CCLC funds for administrative costs associated with carrying out its responsibility to implement the program including establishing and implementing a rigorous peer review process of grant applications and supervising the awarding of funds to eligible organizations (in consultation with the Governor and other State agencies responsible for administering youth development programs and adult learning activities).

State Activities
A State may reserve up to 5% of its 21st CCLC funds to carry out state level activities (1) monitoring and evaluating programs, (2) providing capacity building, training and technical assistance, (3) conducting a comprehensive evaluation of the effectiveness of programs, (4) providing training and technical assistance to eligible entities, (5) ensuring that any eligible entity that receives an award from the State aligns the activities provided by the program with challenging State academic standards, (6) ensuring that any such eligible entity identifies and partners with external organizations, if available, in the community, (7) coordinating funds received with other Federal and State funds to implement high-quality programs, (8) providing a list of prescreened external organizations as described in section 4203(a)(11), (9) working with teachers, principals, parents, the local workforce, the local community, and other stakeholders to review and improve State policies and practices to support the implementation of effective programs.

IV. RFPs and Applications

The 21st CCLC program focuses on providing academic and other enrichment opportunities to children in high-poverty, low-performing schools, and to help these children succeed in meeting state and local academic standards. These are overarching priorities for participation in 21st CCLC programs – targeting services to poor and low-performing schools/districts and prioritizing Title 1 schools.

Experienced directors relayed that new directors should have a clear understanding of what must be in a grant application and to make sure those elements are included. Leveraging an advisory group to help think through RFP decision points can be very helpful as long as the advisory group does not include members who are intending to apply as subgrantees. The advisory group brings another perspective to the table that may not otherwise be represented in the process in terms of implications, priorities, and language in the RFP.

One experienced state director advised hiring someone to evaluate the process once new directors have developed an RFP and completed the grant competition. Having an external person give feedback and conduct interviews or surveys of peer reviewers and applicants to see if the instructions and rubric provided make sense is critical to the process. Questions to grant applicants such as, “Did we give you enough time?" Were the instructions clear?” are very helpful for future RFPs. Examining scores to identify any inconsistencies across reviewers may reveal wording issues with specific questions. Testing hypotheses regarding expected characteristics of applicants (geography, size, type of program) may also reveal aspects of the grant process that contributed to the results of the competition. Developing the RFP and managing the competition should be viewed as an iterative process, so even if a director hasn’t done it before, or hasn’t had someone evaluate the process, he or she can still go back and say what worked, what didn’t work and what needs to improve going forward.

One experienced director commented: “We’ve had to make some big changes in the way the budget is scored. Transportation is a good example of a potentially problematic/confusing area to score. It doesn’t matter if you are in a rural area or in the middle of the city. Transportation is always an issue. Staff costs are always an issue. But they [applicants] don’t recognize that. We would have these really uneven scores around budget where people who didn’t really understand would think this budget is just too high. Or, I don’t think they should be spending the money the way they do. So now we don’t have people just straight out score the budget, but the narrative that accompanies the budget, looking for relationships between, can you see how they plan to support X,Y and Z in their budget? It’s more about the relationship of the budget to the program needs as opposed to does the budget look adequate? We’ve been more nuanced on that. We didn’t do this initially and we do it now, where when we release the RFP, we include the score sheet that the reviewers will use so that when you are applying, you’ll know exactly what criteria – not just this section is worth 20 points, but what are the specific review criteria that total up to those 20 points. The applications that seem to rise to the top are ones who really pay attention to that and answer the questions. They do a better job of aligning it and you end up with more thoughtful, clearly articulated plans because they are much more aligned to what’s important.”

Here is an outline of some tasks to consider in planning an RFP release:

Planning/Back Mapping

- Knowing amount of each grant based on available funding.
- Knowing range of what can be distributed.
- What is the expenditure cap, how many grants can be given in general?
- How many applications do you expect to receive?
- How should you publicize?
- When should Bidder’s Conference take place?
- When should programs be notified and when should money be available?
- How long does the RFP need to be out in the field (60 days)?
- How many reviewers will be needed?
- Electronic or paper submission?

Working with Procurement Office/Other State Offices

- How many offices does the RFP need to travel through before being released?

Embedding State DOE and ESSA

- Content, assurances, data sharing.
- Updating for new components.

Activities

- Plan timeline.
- Recruit, develop, and train Review Team.
- Plan and develop Bidder’s Conference (webinar, onsite, content, recorded).
- Prepare to answer phone and email questions about RFP.
- Log in date RFP received, review each RFP for meeting submission criteria (all components) and record basic descriptive information about each application.
- Plan distribution to reviewers (conflict of interest, team/binary review, lead reviewer).
- Summary of review provided by lead reviewer.
- Develop rubric and feedback mechanism, written comments.
- Lead reviewers assist to draft feedback/summary to applicants.
- Review feasibility of applicant’s budget projections.
- Consider whether to conduct site visit to proposed grantees.

Of course, there are many different approaches to requesting and recruiting applicants to respond to an RFP. Three important features that help form the underlying framework to a successful requesting and recruiting process are: (1) It is important for state directors to understand the priorities of their state. What are the current priorities for the local state department of education that should be reflected in the requesting and recruiting application process? (2) States can use state activity funds (up to 5% of allocation) to provide TA to eligible applicants. This is an important consideration and worth careful thinking on how to utilize funding to provide the kinds of technical assistance that will support the broadest and most successful requesting and recruiting process; and (3) Holding regional workshops can be a mechanism to reach out to eligible prospective applicants.

Many low resourced, small, or rural districts or community organizations face a number of challenges in becoming a part of the application process for 21st CCLC funding. Some of these challenges may include:

1. Lacking grant writing departments or professionals in their school/district/ or community organization.
2. Potential program providers may lack the time and expertise in developing/organizing a program and delivery model.
3. Potential applicants may need more support than currently available for the application process.
4. For a community-based organization this grant application may be the first interaction with federal dollars, so there is unfamiliarity with the “how to” or what to expect.
5. Training to develop a program, prepare staff, and implement activities to reach goals may not be something that is easily available.

One state director talked extensively about how he regularly conducts RFP workshops once an RFP is released in areas that have not previously been represented in the applicant pool. He and his staff would physically put themselves in those counties, hoping word of mouth and proximity of information would help. This director also mentioned how it was helpful to make a conscious effort to attend statewide Department of Education trainings, conferences and workshops to communicate the 21st CCLC grant opportunity, dispel myths and rumors, answer questions about the 21st CCLC program and the RFP in hopes that Title 1 Directors, superintendents, and district staff at those events would better understand and learn about the 21st CCLC program.

Another state released a separate RFP targeting small, rural, underserved areas with set aside dollars. The state department issued two identical RFPs but limited the participation in one of them to only organizations proposing services in one of the counties where there were no 21st CCLC programs. Extra points were awarded through the peer review process to targeted districts. Local workshops were held in these areas on “How to Develop a Budget,” and “How to Do a Needs Assessment” to reach additional prospective eligible applicants. In order to build on this approach the following year, the state again issued two separate RFPs, one RFP with set-aside funds for programs in counties they are not currently serving and another statewide RFP that provided priority points to applicants who are proposing to serve counties where they currently have only one 21st CCLC program.

Supplemental awards offer another method for reaching underserved special populations. Given the abundance of referrals for students on Individual Education Plans (IEPs), special education staff, including school day teachers, lacking necessary training, and limited resources to support needs of students on an IEP, one state director used the supplemental award approach to increase the number of subgrantees serving special education students. Their goals for these targeted students were to enhance the capacity of current 21st CCLC programs to include students on an (IEP), advance student achievement, and provide opportunities for socializing and participating with peers without disabilities.

Managing multiple award cycles is a complex process. Many elements occur simultaneously including organizing and managing site monitoring, overseeing the funding flow, determining the different levels of training and professional development needed, building exemplary programs, and supporting new subgrantees at the same time as wanting to grow experienced subgrantees.

<u>Helpful Information</u>

State Grant Program Application Timeline

Many states around the country are conducting competitions to award 21st Century Community Learning Center grants. The State Contact List now includes links to State websites and recent RFPs.

F-23: How flexible is the timing of the local grant competition?

States may hold a local grant competition at any time in which funds are available for obligation. However, the earlier the SEA makes its local awards, the longer the period of time the grantees will have to implement their programs and obligate their funds. The SEA application to the Department should provide specific information regarding the timing of the local competition. The Department encourages SEAs to allow communities sufficient planning time in which to design a high-quality program and prepare their application. (Non-Regulatory Guidance, 2003)

F-1: What organizations are eligible to apply for 21st CCLC funds?

Any public or private organization is now eligible to apply for a 21st CCLC grant. Examples of agencies and organizations now eligible under the 21st CCLC program include, but are not limited to: non-profit agencies, city or county government agencies, faith-based organizations, institutions of higher education, and for-profit corporations. The statute encourages eligible organizations applying for funds to collaborate with the schools the children attend. The statute also allows a consortium of two or more agencies, organizations or entities to apply. (Non-Regulatory Guidance, 2003)

F-25: Does an SEA have discretion in selecting criteria for its local competition?

Yes. SEAs have the discretion to determine criteria by which to judge applications so long as the criteria are consistent with the purpose, requirements, and priorities in the legislation. In addition, the legislation allows SEAs to require State-specific information and assurances.
In selecting applicants for funding, States may wish to consider using any or all of the five criteria that have been applied by the Department in its national competitions. The Department’s use of these criteria resulted in grants to high-needs areas that proposed high- quality programs. The criteria were:

- Need for Project
- Quality of Project Design
- Adequacy of Resources
- Quality of Management Plan
- Quality of Project Evaluation

(Non-Regulatory Guidance, 2003)

F-28: Can two or more States combine their grant review process?

Yes. However, this approach is likely to be successful only when States decide to use the same competitive processes and selection criteria. Otherwise, reviewers will have to make judgments about application quality using varying standards and criteria, which is likely to result in an unreliable process even if high-quality training is provided to reviewers. If States do decide to hold joint reviews of grant applications, funding decisions must still be made on an individual State basis. (Non-Regulatory Guidance, 2003)

F-4: Are there any required priorities for awarding local grants?
Yes. States must give competitive priority to applications that both propose to serve students who attend schools identified for improvement (pursuant to Section 1116 of Title I) and that are submitted jointly between at least one LEA receiving funds under Title I, Part A and at least one public or private community organization. Although the statute provides an exception to this requirement for LEAs that do not have qualified community organizations within reasonable geographic proximity, such LEAs would still have to propose to serve students attending schools identified for improvement to qualify for the priority. In determining whether an application has been "submitted jointly," States should look for evidence in the application that the LEA and at least one other organization collaborated in the planning and design of the program, each have substantial roles to play in the delivery of services, share grant resources to carry out those roles, and have significant ongoing involvement in the management and oversight of the program. States may want to consider what organization(s) wrote the application, what organization will be the fiscal agent, whether there is a history of these organizations working together, and whether there is evidence in the application of integration of the after-school program activities with the regular school day program. Letters of endorsement are not by themselves sufficient evidence that organizations or school districts have substantially been involved in the design of a program. (Non-Regulatory Guidance, 2003)

F-5: Can a State include other priorities in the local grant competition?
Yes. The SEA is authorized in the statute to include additional priorities in the local competition so long as they are aligned with the statute's requirements and priorities. For example, the State may give priority to novice grantees. However, States cannot establish priorities that would curtail eligibility under this program. (Non-Regulatory Guidance, 2003)

F-7: What is the period of a local 21st CCLC award?
The legislation allows States to award grants for not less than 3 years and not more than 5 years. States can determine the appropriate length of the grants they award within the statutory parameters. (Non-Regulatory Guidance, 2003)

Consultation with Governor's Offices and Other State Agencies
State directors should read their State's Consolidated State Plan or the individual program State plan for Title IV, Part B: 21st Century Community Learning Centers if not included as part of the Consolidated State Plan. The Governor was required to sign these plans. ESSA section 4202(2) (C) requires States to award funds **in consultation with the Governor and other State agencies responsible for administering youth development programs and adult learning activities.**

Relevant SEA Examples and Resources

- California separate Elementary/Middle school and High School application
- Kansas RFAs for new and returning applicants
- Florida Statewide and Geo-diversity RFPs

V. Peer Review Process

Identifying Reviewers
As part of their funding, states are given support for planning a competition and managing a rigorous peer review process for applications. Directors commonly recruit and utilize a cross-section of individuals (extended-learning, education, business, mental health, etc.) for their peer review process. Recommendations and resumes for potential peer reviewers may come from internal contacts, existing subgrantee directors, colleagues in the out-of-school time field, or other networking organization leaders. Directors have suggested that it is important to utilize both in-state and out-of-state reviewers, while at the same time trying to bring in representation from each region of the state.

This approach is meant to balance reviewers understanding of the communities and challenges from which applicants come, but also preserve objectivity in the process.

Process and Training

In some states the peer review process takes place in-person after reviewers have completed an individual review of applicants. Reviewers are then meeting to resolve difference in assessment and recommend final selection. Other review processes take place through virtual meetings, by phone, or submission of review data to the state director. State directors remarked on the significance of providing training to the peer review team. Training ensures a common approach to assessment, correct utilization of an assessment/scoring rubric, and consistent understanding and interpretation of program requirements and expectations.

Scoring and Decision Making

Many states organize the peer review process such that every application is read by at least two reviewers. The director will plan and manage a process that brings the assessment/scoring data together in a way that makes sense. Population served, and geographic location may often be an important factor in making decisions about selected applicants. One state director explained that once the peer review process has been completed a funding cut score is determined based on the scoring of the whole group of applications received. Some directors require peer reviewers to not only submit scores, but also to provide written feedback and rationale that supports the determined score.

Helpful Information

F-26: Who may serve as peer reviewers for local competitions?

An SEA must, through a peer review process or other objective method, ensure that quality applications are selected for funding. The Department encourages SEAs to seek qualified individuals with diverse expertise, geographic location, gender, racial, and ethnic representation to review applications. In addition, the Department encourages SEAs to consider soliciting potential reviewers from a large array of organizations, including educational and non-educational entities. By drawing widely, states are most likely to develop a pool of highly qualified reviewers and thereby ensure that quality applicants are chosen as grantees.

In soliciting reviewers for its national competitions, the Department sought representatives from groups that included, but were not limited to: teachers and principals, experts in expanded learning and after-school programs, representatives from community education, researchers and evaluators with methodological expertise, content area specialists, representatives from community service agencies and faith-based organizations, private-sector individuals involved in education, representatives from school-age child care alliances, local and civic leaders, representatives from foundations and charitable organizations, and representatives from institutions of higher education.

SEAs should also be mindful of potential conflicts of interest that may arise in selecting peer reviewers, especially among grant writers, evaluators, and technical assistance providers. A conflict of interest is generally defined as a situation in which a peer reviewer has a direct financial interest in the outcome of a competition. A conflict of interest situation could exist, for instance, if a peer reviewer (or a member of her immediate family) is named as an evaluation contractor in an application she may review. (Non-Regulatory Guidance, 2003)

Conducting Application Reviews (online or in-person)

The Department's experience indicates that the recruitment and training of peer reviewers is one of the most important factors in ensuring that the highest-quality applications are selected for funding. Recruitment can happen in many ways, including through e-mail or formal correspondence, data base searches, or requests from relevant organizations. The most important aspect of recruitment is the qualifications of the reviewers selected. To ensure that only the best applications are funded, SEAs should provide reviewers with formal training with regard to the selection criteria they will use to evaluate applications. The training should ensure that reviewers thoroughly understand the selection criteria, and the program purpose and goals, before reading applications. (Non-Regulatory Guidance, 2003)

Relevant SEA Examples and Resources

- Texas application reviewer training materials
- Louisiana Peer Review Process
- Utah application scoring rubric

VI. Monitoring Subgrantees

There are many different approaches to monitoring that state directors use. In some states there are consolidated monitoring teams and in other states the single 21st CCLC Director manages all of the subgrantee monitoring for the program. Each year the state must assess risk to determine its monitoring approach.

Experienced state directors offered samples of monitoring models that are used in their states. This following summary was provided by one state director as an overview to her monitoring approach:

> "Each year of the program's existence requires different actions taken. The first-year visit works to introduce the subgrantee to the 21st CCLC program and give guidance. The following couple of years require on-site visits, where the 21st CCLC Director visits and gives the subgrantee an evaluation of their visit. The subgrantee is then required to respond with a course of action to ensure their instance of noncompliance is corrected. Their plan/efforts are then re-evaluated and given a status of cleared, remains open pending additional info, and unresolved pending follow-up visit. The next year requires a phone call with the only difference from the previous year being that an expenditure report needs to be sent to the 21st CCLC Director prior to the phone call. Finally, for the fifth year an on-site visit is required where the subgrantee's purchased items are evaluated and their sustainability efforts are also reviewed. A report is given to the subgrantee following this visit."

Here is the outline of one approach:

1. **Purpose of monitoring**
    a. Making sure 21st CCLC programs are doing what they are supposed to be doing (as regulated by their grant application, and State and Federal statutes, regulations and guidelines).
2. **Stages of monitoring**
    a. **Year 1: Technical Assistance**
        - Allows new grantees to get understanding of whole 21st CCLC program
        - Grantees get guidance on what good programs look like
        - Grantees advised to do self-assessment using 21st CCLC monitoring instrument to make sure they are in compliance with the regulations, and so they can ask for help if needed
        - Gives guidance and in-depth understanding of 21st CCLC programs and what to strive for

b. Years 2 and 3: On-site Monitoring

- Interview Lead staff and Consortium Partners.
- Within 30 days subgrantee get results of visit.
- Subgrantee will have 30 days to respond with corrective actions if needed with supporting documents to clear the citation.
- These documents will be looked at to see if they are good enough to clear citations of noncompliance and to make sure corrective action has been developed within 30 days of receipt of response and tell the grantee their status as: cleared, remains open pending additional info, unresolved pending follow-up visit.
- Following on site monitoring visits, they will send results back within 30 days and then require a response of a plan of action on how to fix citations of noncompliance within 30 days. They will then receive a status on their level of compliance to see if further action needs to be taken.

c. Year 4: Desk Audit

- 15 days before phone call grantee submits detailed expenditure report—with documentation (receipts, invoices), personnel listing, and student progress reports.
- Director reviews documents.
- Phone interview about program design, operation, and management.
- An audit report will be mailed to the grantee following phone interview.
- Grantee has 30 days from getting it to respond if needed.
- That response including any needed documentation will be given a status: cleared, remains open pending additional info, unresolved pending follow-up visit.
- Similar to above except prior to the phone call, grantee needs to send an expenditure report.

d. Year 5: Close-out Monitoring

- Receipts of Year-End Performance Report, completion of the Profile and Performance Information Collection System data, Final Evaluation Report, Final Request for Funds, Breakdown of Expenditures expended over the five-year period and Inventory Log or equipment purchases there will be a visit.
- During the visit: inventory for property purchased with 21st CCLC fund program, sustainability efforts evaluated, grantee must show that another year of out-of-school programming will exist and that items will be used in way consistent with initial intent of purchase (to keep inventory items), final decision made and relayed to grantee.
- Close-out visit made to check items purchased through the 21st CCLC fund as well as sustainability efforts. The program must show they will be using these items for the next year. A decision is made and relayed to the grantee.

One director commented on the series of monitoring checklists that are developed for subgrantees to prepare for monitoring. There are different checklists for first year vs. more experienced subgrantees. First year subgrantee's checklist focuses on schedule of services and activities as detailed in the programs grant application including: number of students/parents served, data collection/evaluation process – rigorous, PD, fiscal accountability, adequate space and resources, safety, transportation not a barrier, collaboration with community as intended in the proposal, strengths/accomplishments, challenges/help from state needed. For year 2-4 subgrantees the emphasis is on actual monitoring by either on-site, phone call, or desk monitoring. There is a tool that the director uses to check and document the subgrantee's activities with a focus on high quality/achieving programs and risk-assessment. In order to support the subgrantees prior to monitoring there are monthly program director meetings and periodic trainings for the program directors. For new subgrantees there are budget trainings at the beginning of the funding year as part of orientation.

Several directors noted how important it is to understand who your subgrantees are. What are they trying to do? What are their expectations? Filter that through your understanding of what the rules and regulations are and do a lot of listening up-front.

Another director commented that to be successful as a new state director you have to go in thinking about this from a relationship standpoint, thinking about it as a partnership, really wanting to know—the folks out there in the field doing the work. When you add up all of their years of experience, it is significant. Experienced directors suggest not being afraid of leveraging and acknowledging the power that can come from thinking of them as your partners and establish a most collaborative approach where it is appropriate. That comes back to knowing what the parameters are so you know where you can have flexibility. Having that kind of approach is really important.

One director summarized the importance of relationship building with grantees in this way, "We fund grantees, in order for them to have effective, meaningful programs with young people…that relationship is key. It's only logical that it's the thread that ties the administrative stuff together. It ties all of the stuff together because it's about being in a human relationship with others in an attempt to do something good and have a positive impact."

Helpful Information

2 CFR 200.331 (d) Pass-through entity monitoring must include: Review of financial and performance reports; Issuance of management decisions for audit findings on subrecipients; and Follow-up activities ensuring subrecipients take timely, appropriate action to cure deficiencies.

2 CFR 200.331 (e) the pass-through entity must assess risk to determine monitoring approach. Monitoring and follow up may include: (1) Providing training and technical assistance, (2) Performing an on-site review of entity's program operations, and (3) Arranging for agreed-upon-procedures for audit services.

Relevant SEA Examples and Resources

- Iowa Monitoring Plan
- West Virginia Monitoring Plan
- Alabama Monitoring Manual

VII. Professional Development and Technical Assistance (TA) for Subgrantees

Professional development and technical assistance (TA) opportunities have the common goal of increasing the knowledge and skill of workers and can lead to the improvement of performance and the efficiency of a program, organization, or institution. In the out-of-school time field there are a variety of professional development, trainings, and technical assistance support available to workers that include higher education, service trainings, mentoring, supervision, national and local conferences, newsletters, online discussions, webinars, and other informal resources. The provision of TA and development and delivery of professional development opportunities by State 21st CCLC leaders for local grantees can be an important mechanism to ensure proper accountability to 21st CCLC program requirements and the achievement of local and statewide performance goals.

Each state and all 21st CCLC subgrantees must have an annual professional development plan. Technical assistance may include sharing of information and expertise, instruction or skills training, and more generally the transmission of knowledge from one person to another or to a group, including in the form of coaching. Technical assistance can be delivered in a variety of methods including site visits, webinars, phone calls, email exchange, through manuals, or in person through a coach or mentor. Technical assistance is usually organized and delivered to address a need or challenge.

One director mentioned the significant level of TA received from a partnership with a third-party evaluator that has helped to initiate an annual self-assessment based off a program quality assessment tool. This allows the sites to look at the quality of their program as well as develop improvement plans that are then sent to the evaluator who lends them support to build and initiate these quality improvement plans. In addition, online and in-person trainings are provided by the evaluator to the sites to help staff improve their practices. Additional support to subgrantee program leaders comes through monthly progress calls. These progress calls then lead to program director coffee chats where directors share with their peers across the state. All of these processes have helped create a culture of continuous improvement in this state, and many of the new ideas for program change have been initiated by subgrantee program directors.

Several state directors mentioned utilizing consultants and contracted quality advisors to help support professional development, technical assistance, and quality building in their states. Sometimes consultants or quality advisors work 1:1 with subgrantee directors and other times facilitate meetings among groups of subgrantee directors. A number of state directors mentioned holding monthly meetings (virtual or in-person pending on the size of the state). At these meetings program directors may have an opportunity to meet in natural affinity groups based on where they are in a grant cycle or other characteristics, e.g., experienced program directors, single-site program directors, or new subgrantee program directors.

New directors may find that there are existing contracts for professional development and technical assistance in place when they begin their tenure as director. It is important to really understand, especially if you have an existing TA contract, what the contract is asking for. What is the purpose of it? What are the federal requirements that it is fulfilling? It is crucial to know this so that you can manage your contractors. A lot of times, you don't want your contractors to get ahead of you, but you need to know what they are doing and why they are doing it. You have to build a trusting relationship with them, so you need to really understand why they are doing what they're doing.

One director commented on having roughly 6 FTE's, plus some part-time contractors: "They do all of the statewide training and each grantee is assigned a TA assistance director. There are 5 of them. Those are the folks who are the frontline staff for me with the subgrantees. They do all of the training and TA. I have another contract for program monitoring. That is probably 3 FTE's plus part time. They do program monitoring of all of our grantees. There are also staff internally that do federal fiscal monitoring. I have another contract for an annual conference. They also coordinate some meetings for me. We have our own data system. I contribute to a contract that the larger agency has for IT systems. They do multiple applications for us. Mine is one of them. They are with another organization, but they are actually housed here, so we interact with them as if they are staff, but they are really contractors."

State directors use a variety of professional development methods to provide support and learning opportunities to their subgrantees. One state director commented that regional meetings are intentionally conversational and interactive; an informal type of delivery, more lateral than vertical, where there is sharing best practices with each other and the chance to develop a sense of community within individual regions. In those meetings, program leaders communicate and share monitoring information, best practices, and their approaches to meeting requirements from the state. These types of meetings also allow rookie state directors to hear what grantees' questions and concerns. State directors also hold entire statewide trainings as well, with all grantees required to attend. While this may be large attendance training, there are opportunities to have small breakout sessions and focus on specific issues and needs, answer questions, and offer advice.

Helpful Information

SEA Support for Subgrantees

The reauthorized 21st CCLC program statute defines external organization under section 4201(b)(4) as "(A) a nonprofit organization with a record of success in running or working with before and after school (or summer recess) programs and activities; or (B) in the case of a community where there is no such organization, a nonprofit organization in the community that enters into a written agreement or partnership with an organization described in subparagraph (A) to receive mentoring and guidance in running or working with before and after school (or summer recess) programs and activities" (20 U.S.C. 7171(b)(4)). Under section 4203(a) (11) of the ESEA, as amended by the ESSA, each State must describe in its application for 21st CCCL program funds how it will "prescreen external organizations that could provide assistance in carrying out [program] activities" and "develop and make available to eligible entities a list of external organizations that successfully completed the prescreening process" (20 U.S.C. 7173(a) (11)).

The requirement in section 4203(a) (11) is intended to improve the quality of 21st CCLC programs at the local level by helping eligible entities gain access to a broad network of expert nonprofit organizations that are qualified to assist and support subgrantees in the development and implementation of evidence-based, high-quality before school, after school, and summer learning programs, including programs and services offered during expanded learning time (ELT). (FAQ - Every Student Succeeds Act (ESSA))

To sustain a quality program, staff and volunteers who will be delivering academic support and enrichment services should be provided with ongoing training and learning opportunities, both to ensure that they interact appropriately with students, and also to prevent high rates of student turnover. Staff training should focus on how to work with children, how to negotiate, and how to address the needs of children of different ages, races, and cultures, and children with disabilities. Training can also give staff ideas for enrichment and hands-on activities, greater expertise in academic subject matter, knowledge in assessing student progress, and strategies for implementing the different program components of academics, enrichment, and recreation. (Non-Regulatory Guidance, 2003).

Relevant SEA Examples and Resources

- LA Technical Assistance Checklist
- TX technical Assistance and Training RFP
- Oklahoma Technical Assistance and Intervention Framework

VIII. Evaluation

Evaluation is an important part of the 21^{set} Century Community Learning Centers program. Evaluations enable reflection on the work that has taken place and the ways the work impacts youth participants, adult participants, schools and community organizations. High-quality and comprehensive evaluations can:

- Inform decision-making
- Improve program effectiveness
- Inform policy development
- Identify problems
- Assess progress towards goals

The words “high-quality” and “comprehensive” are key. Evaluation has to be done well and thoroughly for it to help in the ways that it can.

Creating a logic model for the 21st CCLC state program can be a helpful step in planning a comprehensive statewide evaluation and measurement model. Logic models are a visual and shared way to integrate planning, implementation, and evaluation. Goals for the program are captured in one part of the model as well as strategies towards the accomplishment of outcomes including all of the resources and activities that go into programs, such as space and curriculum and what is actually done in programs every day. The performance measures section of a logic model guides the collection of certain types of data to be able to know that staff are carrying out the work that was planned. Logic models help prevent mismatches between goals, activities and effects, and using logic models as a planning and organizing tool enhances accountability by keeping stakeholders focused on outcomes.

Evaluation and measurement approaches grow out of the research questions that leaders of 21st CCLC statewide programs bring forward. Here is a sample of some of the questions that might resonate with implementation of the 21st CCLC program in your state. These are questions that can be answered through the collection of statewide aggregated data and may also apply to individual grantees working with local evaluators.

- What dosage is connected to better progress on school attendance and targeted performance measures?
- What contribution does participation in 21st CCLC make towards the improvement of social-emotional learning skills?
- Which program models, activities, or strategies seem to correlate with more progress on performance measures?
- Which subgroups of youth get the most impact from participation in our 21st CCLC programs?
- What are the areas of program delivery in which we excel? In which areas of program delivery do we see challenges?

Many state directors’ contract outside vendors to conduct the statewide evaluation tasks. These vendors may be university-based researchers, independent evaluation and research organizations, or evaluation consultants. One director noted that it is critical to be very clear about what you want to get out of an evaluation. Otherwise, you might end up with an evaluation that’s more about what the evaluator wants to do and doesn’t prioritize the needs of the 21st CCLC program. Developing a scope of work for the evaluator is an important step and that process can be informed with input from internal department colleagues, experienced subgrantee program directors and other regular advisors.

Successful statewide evaluation is contingent upon working with subgrantees to effectively execute evaluation tasks at the local level. Subgrantees may need assistance in the form of webinars or TA to organize and carry out local level evaluation work. As part of their contracted work, some statewide evaluators work with local evaluators to ensure that the local evaluation process is implemented in ways that contribute to and support the statewide evaluation. For example, it is important that local evaluation is set up to collect the right data, use appropriate tools, meet data deadlines, follow reporting protocols, etc.

Key steps to ensure this cooperation include:

- Advanced and timely communication with subgrantees.
- Organize and share a timeline for data collection.
- Sharing of tools ahead of data collection implementation.
- Making sure that key local personnel are included in information/communication chain.
- Working with experienced partners.
- Clarifying what should be evaluated.
- Continuity in communication and approach.

<u>Helpful Information</u>

H-5: What are the State evaluation requirements?

States must conduct a comprehensive evaluation (directly, or through a grant or contract) of the effectiveness of programs and activities provided with 21st CCLC funds. In their applications to the Department, States are required to describe the performance indicators and performance measures they will use to evaluate local programs. States must also monitor the periodic evaluations of local programs and must disseminate the results of these evaluations to the public. (Non-Regulatory Guidance, 2003)

H-6: What are the evaluation requirements for local grantees?

Each grantee must undergo a periodic evaluation to assess its progress toward achieving its goal of providing high-quality opportunities for academic enrichment. The evaluation must be based on the factors included in the *principles of effectiveness*. The results of the evaluation must be: (1) used to refine, improve, and strengthen the program and to refine the performance measures; and (2) made available to the public upon request. Local grantees, working with their SEAs, must evaluate the academic progress of children participating in the 21^{set} CCLC program. (Non-Regulatory Guidance, 2003)

H-8: How does a State ensure that organizations other than LEAs will be able to provide academic enrichment and have access to student achievement data?

In the local competitions, SEAs must include a priority for applications submitted jointly by (1) an LEA receiving Title I funds, and (2) CBOs or other public or private organizations that propose to serve students attending schools in need of improvement. Through such partnerships, a grantee responsible for implementing and evaluating the local program can ensure access to student achievement data. Because of the legal obligation to maintain confidentiality of student data, the Department encourages LEAs to gather the achievement data necessary to evaluate the effectiveness of the program. The LEAs should also be responsible for sharing the content area standards and curriculum with its partners. Whether or not a grantee has a formal partnership with an LEA, it still must evaluate the program consistent with the statute's principles of effectiveness. (Non-Regulatory Guidance, 2003)

Relevant SEA Examples and Resources

- [Maine Statewide Evaluation Report: 2015-2016]
- [Connecticut 2015-2016 Evaluation Report]
- [New Mexico Partners Report 2015-2016]

IX. Risk-Assessment

States are required to evaluate each subgrantee's risk of noncompliance with federal statues, regulations, and terms and condition of the 21st CCLC subaward for the purpose of determining the appropriate approaches to monitoring. Risk-assessment at the time of award determination may consider such things as:

- The subrecipient's prior experience with the same or similar subawards;
- The results of previous audits;
- Whether the subrecipient has new personnel;
- Whether new, or substantially changed, systems have been implemented; and,
- The extent and results of monitoring conducted by the Federal awarding agency (e.g., if the subrecipient also receives Federal awards directly from a Federal awarding agency).

Many states have developed a risk-assessment tool/document that is used in conjunction with performance monitoring following the awarding of a grant. The application and completion of this tool results in the classification of each subgrantee into a risk category which may include labels such as high risk, moderate risk, or low risk. A set of follow-up requirements and procedures are connected to each category. In the risk-assessment tool/document it is also made clear what corrective actions, oversight, and future monitoring may need to take place. The risk-assessment score, and any identified areas of weakness, should assist the state director in determining the depth, scope and priority for each subrecipient monitoring plan or approach.

One state recently began using their risk-assessment results to better inform monitoring decisions and established criteria of ranking to determine subgrantee's tiered status. For sites in the lowest risk level, the directors did a pre-monitoring review with them. If sites were at the moderate level tier, the State did an online, desk-top monitoring review. Subgrantees at the highest risk level receive a full onsite visit that the state would have done in the past for all sites regardless of risk.

At the moderate, desk-top monitoring tier, the state only uses a handful of indicators. They identified critical priority indicators, approximately 1/3 of those on their monitoring document, whereas the highest risk grantees were monitored at the full, 100% of indicators level as part of their review. The benefit of using this risk-assessment approach to determine monitoring levels is the time and resources involved. More TA can be offered to grantees during the monitoring process since not all of the state's time is spent monitoring. The new approach also reduces time requirements for grantees. The significant shift in the new process is that the state provides TA training prior to monitoring. The TA covers topics such as getting ready for monitoring in terms of documentation and uploading data, as well as the process for submitting any corrective actions. The state director goes over indicators and documents required for monitoring so that sites are collecting and maintaining the necessary documents, but also implementing requirements as they go along. The state has moved to an online system for federal grants which has helped reduce some of the paperwork and back and forth they used to have with subgrantees.

In one state, before an award is made, the first step is to conduct a pre-contract site visit. Grants are not awarded unless there is an onsite visit. A pre-contract visit is an opportunity to see where the program is located and meet the partners, business office and all of the main parties to the grant.

There are two parts of the initial risk-assessment, a paper form and an onsite visit. Part of the visit is an introduction and part is a conversation to identify any issues that can be addressed up front rather than waiting six months to correct. During this initial visit, the state ensures that expectations for the grant are laid out clearly so that both the state and the subgrantee are protected. Any additional considerations identified as part of the paper or in-person risk-assessment are added to the terms and conditions of the grant agreement. For example, if questions regarding a subgrantee's record-keeping are raised as part of the risk-assessment, additional considerations in contracting may include requiring subgrantees to submit supplemental documents for the first six months of the grant.

Post-award risk-assessments include annual onsite monitoring and ongoing file/document review for all subgrantees looking at the financial, programmatic and evaluation side of each subgrantee. It is an ongoing task for the state director to determine if anything has changed, any new concerns have arisen, or if financial reports are accurate and timely. These results may necessitate a reshuffling of the order in which sites are monitored and also identify patterns for future TA and training across the state. Depending on what the state director finds, follow-up from risk-assessment ranges from official letters detailing specific corrective action plans to notifications indicating components of the grant agreement are not being met (such as habitually late reports) to conversations during program visits. The state uses all of the pieces of the risk-assessment process, from checklists to informal conversations to annual monitoring site visits, to determine when, where and how to engage with their subgrantees to make sure programs are on the right path.

Helpful Information

2 CFR 200.331 (b) Pass-through entities must evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for the purpose of determining the appropriate monitoring actions. Risk-assessment does not have to be completed before subawards are made, but recipients can decide to make assessments before making the subawards.

2 CFR 200.331 (d) Pass-through entity monitoring must include: Review of financial and performance reports; Issuance of management decisions for audit findings on subrecipients; and Follow-up activities ensuring subrecipients take timely, appropriate action to cure deficiencies.

2 CFR 200.331 (e) the pass-through entity must assess risk to determine monitoring approach. Monitoring and follow up may include: (1) Providing training and technical assistance, (2) Performing an on-site review of entity's program operations, and (3) Arranging for agreed-upon-procedures for audit services.

Relevant SEA Examples and Resources

- Florida Risk Analysis rubric
- Hawaii Risk Assessment
- Oregon Risk Factors & Supports
- Texas Fiscal Monitoring Plan & Risk Assessment

X. Sustainability: Supporting the Maintenance of High-Quality Programs

Subgrantees are required to describe plans for continuing their programs beyond the period (3-5 years) of their 21st CCLC grant. Though this can be challenging, it is important to support subgrantees in keeping a focus on sustainability. The goal as a state director is to work with subgrantees on a full, interconnected vision of sustainability including planning, implementation, monitoring, evaluation, and reflection that leads to sustained high-quality programming.

Supporting Grantee Program Sustainability as a State Director

Experienced state directors help subgrantees think beyond money. A definition of sustainability can drive this effort. For some, the definition of sustainability is "building and maintaining high quality programming," while others frame sustainability in terms of resiliency, "where resiliency is looking for ways to manage in a world that is imbalanced." Success may come with a new mindset, with believing that it is possible to sustain high quality programming and trusting that funding will come to strong programs.

Though it is up to the program to identify staff to focus on sustainability efforts, engage in partnerships, implement high quality programming, secure private and other public funding, engage the community, and invest in professional development for staff, there are many ways state directors can provide support. State directors can set expectations (e.g., ensuring sustainability plans are included in the RFP), put supportive structures into place (e.g., oversee the grant duration and amount), and provide technical assistance and facilitate capacity building efforts.

Setting expectations for subgrantees

Experienced state directors report that requirements and expectations help keep sustainability at the forefront. Most commonly, states require the development and maintenance of a sustainability plan, either to be submitted with applications or within the first year. Sustainability plans may require subgrantees to specify additional sources of funds and/or in-kind services, identify community partners (and might require letters of commitment), and describe how they will maintain and expand partnerships.

Many states additionally require that sustainability be included as part of the role of the advisory board. A board might meet quarterly or annually to work on communication, advocacy, and other aspects of sustainability. Note that a few state directors meet with the subgrantee and advisory board annually or in the last year of the grant.

Monitoring further ensures programs are focused on building and maintaining high quality programs. Sustainability is included in monitoring protocols, and sustainability plans are most often updated and reviewed annually (usually as part of the continuation process in addition to monitoring). This provides an opportunity for state directors to give feedback on plans and provide technical assistance if needed. Some state directors specifically review evidence of advisory board meetings and progress on plans or require other evidence of community involvement in sustainability planning.

Putting structures in place

Many states set guidelines or provide a template for submission of subgrantee sustainability plans and budgets. State directors can also help subgrantees set action steps and timelines and monitor these plans. Further, evaluation and data collection can be leveraged to support sustainability. At least one state includes sustainability as a goal in its statewide evaluation, with specific indicators that are measured over time.

While some states have found reducing funds in the last years of the grant lays the groundwork for sustainability, others have found it most beneficial to offer full funding for the entire length of the grant. One experienced director explained his intentionality when setting grant amounts: he is careful not to invest too much in small communities, only to create a funding vacuum when the grant ends.

Providing Technical Assistance
Most state directors offer training or technical assistance around sustainability. It is usually covered at annual statewide conferences, and often at regional trainings as well. Online resources such as webinars are also common. Sometimes these supports are offered in partnership with the statewide afterschool network. Topics may be around sharing performance data with local funders, building partnerships, or promoting other best practices. State directors also offer individual technical assistance, provide resources, and support communities of practice for site coordinators on sustainability topics.

Providing other supports
State directors have found additional ways to support their subgrantees. For example, some SEAs notify subgrantees of federal, state, and local funding opportunities, promote blending or braiding multiple funding sources, and have been involved with efforts by their statewide afterschool networks to achieve state investment in afterschool. Maintaining the required list of external organizations helps subgrantees identify potential partners. Further, state director can often be valuable conveners of potential partners, funders, and community champions, allowing subgrantees to access their networks.

Sustainability steps
State directors can help subgrantees navigate four sustainability steps:

Determine Action. What do you want to sustain, why, and how will you measure success?
Conduct a Gap Analysis. What are the fiscal needs and available resources?
Form a Strategy. Determine what strategies will be used, which may be a combination of cost-saving options and ways to generate new revenue.
Execute the Plan. Do it! Document the plan, build a system of support (such as an advisory board), and build in a continuous improvement process.
(Westat, https://www.westat.com/)

Promising Practices and Lessons Learned Shared by Experienced State Directors

Strategies:
Several keys to program sustainability were gathered from 21st CCLC administrators and reported by The Finance Project (2006): forming collaborative partnerships, maintaining diverse portfolios of funding sources, building high-quality programs, cultivating support from schools, finding a champion in the community, and engaging the community.

Many of these strategies are consistent with the promising practices reported by current state directors:

- Successful partnerships and relationships are essential, including active advisory boards and connections with the school day.
- Data and program evaluation should be used to demonstrate the value of programming to the community and local business partners.
- Pay attention to sustainability early on and leverage community resources at the front end – it takes time to develop partnerships and resources.
- Ultimately, having high quality programs is what matters. Sustaining high quality programs should be communicated as an investment in youth and learning.

Possible Funding Sources:
Funding may be found from and blended or braided with a variety of sources, including Child Care Development Fund subsidies administered by the Federal Office of Child Care, local school budgets, Title funds, partnerships with local businesses, other federal, state, or local grants, and program fees

(though there are varying opinions on the benefit of charging program fees). In-kind support such as staffing, and materials may also result from partnerships with local businesses as well as colleges and universities.

Programs are finding creative ways to build and leverage partnerships. Some examples: partnering with and receiving funds from a local technology company for a STEM program, using work study students from a local university for staffing, and working toward a local bond to support afterschool programming. Some programs have found that parents can be successful advocates (e.g., with city councils or school boards).

Helpful Information

ESSA 4203 (a) (8) (B): the state application must include assurances that the state "will require each eligible entity seeking such an award to submit a plan describing how the activities to be funded through the award will continue after funding under this part ends;"

ESSA 4204 (b) (2) (K): the subgrantee application must include… "a description of a preliminary plan for how the community learning center will continue after funding under this part ends;"

Relevant SEA Examples and Resources

- Mississippi Sustainability Plan template example and training webinar
- Iowa Sustainability Plan Template
- Vermont Statewide Evaluation Report (see goal 4, p. 37)

References:

Szekely, A. & Padgette, H.C. (2006). *Sustaining 21st CCLC: What Works for Programs and How Policy Makers Can Help*. Washington, D.C.: The Finance Project. Retrieved from https://files.eric.ed.gov/fulltext/ED499570.pdf

XI. Program Income

What is program income?

Program income is any gross income earned by the non-Federal entity that is directly generated by a supported activity or earned as a result of the Federal award during the period of performance (2 CFR §200.80). Income guidelines apply at both the statewide and local program levels.

- At the state level, program income is revenue generated by the State as a direct result of the Federal award and that is in addition to the Federal funds provided by the U.S. Department of Education.
- At the program level, program income is revenue generated as a direct result of the Federal award and that is in addition to the Federal funds provided by the State through its competitive subgrant application process.

The Uniform Guidance 2 CFR § 200.307(e) governs the use of program income. In general, non-Federal entities are encouraged to earn income to defray program costs where appropriate.

Department of Education approval to generate program income
SEAs must request written prior approval from the U.S Department of Education to generate income at the statewide or subgrantee levels. Program Income generated without prior approval from the Department must be deducted from the funds awarded under the Federal grant. (2 CFR §200.307(b)).

Adding to Federal award: With prior approval from the U.S. Department of Education, program income may be added to the Federal award. The program income must be used for the purposes and under the conditions of the Federal award.

Deducting from Federal Award: Ordinarily, program income must be deducted from total allowable costs to determine the net allowable costs. Program income must be used for current costs unless the Federal awarding agency authorizes otherwise. Program income that the non- Federal entity did not anticipate at the time of the Federal award must be used to reduce the Federal award and non-Federal entity contributions rather than to increase the funds committed to the project.

In specifying alternatives to 2 CFR 200.407(e)(1) and (e)(2), the Federal awarding agency may distinguish between income earned by the SEA and income earned by subgrantees and between the sources, kinds, or amounts of income. Program income in excess of any amounts specified by the Department must also be deducted from expenditures.

Example of state program income
A state uses 21^{st} CCLC program funds to put on a technical assistance conference and charges a registration fee. Some of the participants are not 21^{st} CCLC subgrantees and those participants pay the registration fee with non-Federal money, i.e. state or local funds. The non-Federal money collected is program income.

Example of subgrantee income
A state would like to allow its subgrantees to sell popcorn at afterschool events and reinvest the proceeds into its 21^{st} CCLC program. If 21^{st} CCLC program funds were used to purchase the popcorn and other materials, then the revenue generated would be considered program income. In order to invest the program income into the 21^{st} CCLC program, the State must first, submit a request for written prior approval to earn program income and to invest the program income into its 21^{st} CCLC program. Upon receiving written approval from the Department, the State must then give prior written approval to the subgrantee for the subgrantee to generate and reinvest program income into its program (if the State's request is approved by the Department).

Communicating program income policy
General parameters regarding the generation and usage of program income should be in States' Requests for Applications or other program guidance document. If a State plans to allow subgrantees to generate program income, the State should request that applicants for subgrants include a plan for earning program income. This plan should include the anticipated amount income and a description of how generated program income will be invested in the program in ways that adhere to the statute, State Plan, Uniform Guidance and any applicable state regulations. [This is only one example of how a State might administer/manage program income-– while some states may choose to use this approach, other states may choose a different approach].

When prior approval is given to a subgrantee; the State must be very clear that program income may only be used for authorized and allowable activities per the statute, State Plan, Uniform Guidance, other applicable Federal and State regulations and the approved application.

The State should be clear when describing how the program income will be generated, the purpose for generating program income, and how the program income will be used; [State must be clear in its request to the Department; subgrantee must be clear in its request to the State].

The cost of generating program income

If authorized by Federal regulations or the Federal award, costs incidental to the generation of program income may be deducted from gross income to determine program income, provided these costs have not been charged to the Federal award. (§200.307(b)) For example, if a subgrantee hosts a car wash and spends $20.00 of Federal funds on supplies that earn $200.00 dollars, by deducting the $20.00 of supplies costs from the gross income of $200.00 earned it is determined that the subgrantee earned $180.00 of program income.

Government Revenues

Governmental revenues are taxes, special assessments, levies, fines, and other such revenues raised by a non- Federal entity are not program income unless the revenues are specifically identified in the Federal award or Federal awarding agency regulations as program income. (§200.307 (c)) If a local municipality enacts a one cent sales tax to support afterschool programs and sub-recipients receive some of the generated funds; these funds would not be considered program income.

Cost sharing or matching

With prior approval of the Federal awarding agency, program income may be used to meet the cost sharing or matching requirement if the Federal award requires a match. The amount of the Federal award remains the same. (§200.307 (3))

Parent Fees

The 21st CCLC program statute does not specifically prohibit the collection of parent fees; however, States should be thoughtful in its use of seeking approval for generating fees. For grantees and subgrantees that collect parent fees, they should understand that the income generated by the fees is considered program income.

When SEAs consider parent fees:

- States should seek prior approval from the Department in order to allow subgrantees to charge parent fees;
- The State should include in the State Plan or the State's Request for Applications (or other documentation as specified by the Department) the States' policy for allowing sub-grantees to charge parent fees;
- In order to use program income for grant or subgrant activities, there must be a plan, approved by the Department, for how the generated program income will be used. The proposed plan should describe the purpose for the fees; a detailed plan for expending the generated income; and answer the who, what, when, where, how and why;
- Parent fees should be nominal;
- The fee should be the same for all students
- No child can be excluded from the program even if the student's family is incapable of paying the nominal fee.

If a subrecipient charges a nominal fee for parents of students in its afterschool program and does not request written prior approval from the State prior to collecting the parent fees, the program income would need to be deducted from the amount of subgrant funds awarded to the sub-recipient. The amount of fees collected also would have to be deducted from the amount of grant funds awarded to the State.

Helpful Information

There must be written prior approval given from the Department for a State and its subgrantees to generate program income. Program Income generated without written prior approval from the Department must be deducted from the funds awarded under the Federal grant. (§200.407) Subgrantee program income is any revenue generated as a direct result of the Federal award that is in addition to the federal funds provided by the State through its competitive subgrant application process.

With prior approval from the U.S. Department of Education, program income may be added to the Federal award. The program income must be used for the purposes and under the conditions of the Federal award. The funds must be used during the grant's period of performance.
Revenues raised by a non-Federal entity are not program income unless the revenues are specifically identified in the Federal award or Federal awarding agency regulations as program income.

The State must be very clear that program income may only be used for authorized and allowable activities according to the statute, State Plan, Uniform Guidance and other federal regulations, state regulations, and the approved application.

The State/subgrantee must describe a plan that includes specifics for how the funds will be utilized. The specifics should include the HOW, WHAT, WHEN, WHERE, and WHY. The State shall describe the impact to the program if the Department does not approve the request. Finally, the request shall describe how the use of program income will help the State meet the objectives of the 21st CCLC program.

General parameters for program income must be stated in the:

- State Plan (or document as approved by the Department) for the State's use of program income (if the state wants to generate program income);
- State's Request for Applications (once approved by the Department) notifying potential applicants that program income is approved
- Subgrantees' grant application that includes description of how program income will be generated the purpose for generating the program income, and how the program income will be used adhering to the statue, State Plan, Uniform Guidance and any other federal or state regulations, and the approved application.

Relevant SEA Examples and Resources

- Vermont program income request to ED
- Maine program income request to ED
- Maine financial report template