



Nita M. Lowey 21st Century Community Learning Centers Out-of-School-Time Programs: Coronavirus Update

ISSUED MARCH 25, 2020

During a school-building closure period, school buildings are closed to students. The goal of this action is to slow the spread of the coronavirus (COVID-19) to ensure the health and safety of our state and local communities. Sherri Ybarra, the Superintendent of Public Instruction, has directed that schools should work to provide education through alternative means to the extent practicable and based on each district and school's capacity. Nita M. Lowey 21st Century Community Learning Centers (21st CCLC) program providers can be an important component to continuing to support students. However, it is likely that delivery of program activities will be different during this closure period.

This document was prepared by the 21st CCLC team from the Idaho State Department of Education (SDE) as we wait for further direction from the US Department of Education (USDOE) and their COVID-19 response team. Any contents of this document may change if/when we receive further guidance from USDOE. The information in this document is intended to help inform the actions of 21st CCLC program providers during this period. Please refer to the Idaho State Department of Education's [website](#) for up-to-date information. As we are practicing social distancing to flatten the curve and slow the spread of COVID-19, there are ways to be flexible and creative in how we continue to support our students most in need.

References:

- [M-20-17 Memorandum from the Office of Management and Budget dated March 19, 2020](#)
- [Uniform Grant Guidance](#)

CAN WE CONTINUE TO PAY FOR WORK DURING SCHOOL CLOSURE RELATED TO COVID-19?

Reference: OMB Memo: Allowability of salaries and other project activities (200.403; 200.404; 200.405) and UGG 2 CFR 200.430(a)

Yes, the Idaho State Department of Education 21st CCLC team has determined at this time that staff may continue to be paid with 21st CCLC grant funds for work, including remote work, to

attain local 21st CCLC project goals at the discretion of the local district or organization. Adjustments to original job descriptions and/or activities must align with the original grant purpose and serve the intended grant beneficiaries. SDE staff have been asked to track work specific to any response and adaptations made in the face of COVID-19. We require that Time and Effort work logs be kept for accountability purposes for personnel reimbursed with 21st CCLC funds. However, there will not be additional 21st CCLC funds allocated to support additional staff requirements. Allowable work (permissible uses of funds) includes:

- Virtual staff meetings (conference calls, Zoom meetings, Skype, etc.)
- Online professional development
- Curriculum work (must be specific to the 21st CCLC program)
- Lesson plan development (must be specific to the 21st CCLC program)
- Online or other remotely delivered programming for youth may be reasonable and necessary. If virtual programming is not an option, an attempt can be made to provide other activities and physical learning supplements to students.
- Academic support for students through remote/off-site learning opportunities (tutoring online) utilizing platforms to which students have access.
- School collaboration efforts (such as resource building, evidence-based math and reading support, etc.).
- Student and parent education and social-emotional and well-being support.
- Family education and engagement opportunities (including community supports, such as information about where meals are being provided, how families can support their children during the period of ordered school-building closure, etc.).
- Gathering virtual and off-site student materials and information to support families.
- 21st CCLC program data entry/validation
- Systems planning work (e.g. summer programs, evaluation, sustainability, safety, budgeting)
- Other expectations and associated job tasks listed in job descriptions that are reasonable and necessary during the closure period

WHAT SHOULD BE INCLUDED IN REPORTING TIME AND EFFORT?

Time and Effort will need to be recorded for all work related to 21st CCLC program compensation 2 CFR 200.430(i). The records MUST: (1) be supported by a system of internal controls; (2) be incorporated into official records; (3) reasonably reflect total activity for which employee is compensated; (4) encompass all activities (federal and non-federal); (5) comply with established accounting policies and practices; and (6) support distribution among specific activities or cost objectives. All Time and Effort records will need to be made available to the pass-through entity (SDE) during monitoring and compliance reviews.

CAN WE HIRE ADDITIONAL STAFF OR PAY OVERTIME FOR STAFF ACCOMMODATING PROGRAM ADAPTATIONS?

Reference: OMB Memo: Allowability of salaries and other project activities (200.403; 200.404; 200.405)

Yes, so long as your current budget allows for that expense, there will not be additional 21st CCLC funds allocated to support additional staff requirements. For example, you may have IT staff working to help get your staff and program participants set up for webinars. You may pay that IT staff for their time from your 21st CCLC budget.

CAN WE USE 21ST CCLC FUNDS TO PAY FOR EMERGENCY DAYCARE?

No, 21st CCLC funds must be spent staying within the original grant purpose and serving intended grant beneficiaries. 21st CCLC grants are written with the intent to serve select target populations and a limited number of students within that population to deliver academic and enrichment opportunities. **There will be NO Flexibility granted in using 21st CCLC funds outside of the original grant purpose or to serve unintended grant beneficiaries.**

WHICH PROGRAM ACTIVITIES CAN CONTINUE DURING THE ORDERED SCHOOL-BUILDING CLOSURE PERIOD?

A variety of activities that are part of 21st CCLC programs can continue. Activities must be in support of program goals and directly related to program effectiveness and student achievement. When making decisions about program activities involving students, providers should consider the following questions. These considerations are designed to drive practical approaches that are sensitive to ensuring the health and safety of students, educators and the community:

- Does the activity support the original grant purpose and the intended beneficiaries of the grant?
- Is the activity essential?
- Can the activity be done virtually?
- If there is no other choice, can the activity be done safely? This means individuals are separated by distance, not congregating in close proximity and the health of participants (students, educators and others) is protected.

The SDE will make reasonable and fair accommodations to expected results within the 21st CCLC program goals due to the ordered school-building closure.

WHAT INFORMATION SHOULD SUBGRANTEES TRACK AND CONSIDER AS WE PROCEED?

Subgrantees should consider the following:

- Maintaining Time and Effort records of daily hours and general work type during the ordered school-building closure period.
- Tracking lost program time, lower attendance results, lower expenditure patterns and/or other outcome data as part of the 21st CCLC program local evaluation.
- Continuing to meet federal supplement, not supplant, requirements.
- Proceeding with program and budget revisions as necessary, including as needed to support the purchase of appropriate online learning tools for purposes of supporting students and families enrolled in 21st Century Community Learning Center programs. Justification is required when revisions are made as a result of the ordered school closures.

HOW WILL SCHOOL CLOSURES IMPACT THE GRANT PERIOD CURRENTLY UNDERWAY FOR THE 2019-2020 SCHOOL YEAR?

For those 21st CCLC programs that are required to shut down to limit risk of exposure to communicable disease, please work with the SDE team to determine how to best meet the needs of the students and families while meeting state objectives.

WHAT WILL WE BE DOING FOR SPRING DIRECTOR'S MEETING?

With the Idaho Prevention and Support Conference cancelled, everyone who had already registered should see refunds in their accounts. The Spring Director's meeting will be organized in a virtual format on April 8th, 2020. More details on that to follow.

CAN I PAY CANCELLATION FEES WITH 21ST CCLC FUNDS?

Reference: OMB Memo: Allowability of Costs not Normally Chargeable to Awards (200.403; 200.404; 200.405)

Recipients are permitted to charge costs related to the cancellation of events, travel, or other activities necessary and reasonable for the performance of the award, or the pausing and restarting of grant funded activities, due to the public health emergency. However, be mindful that additional funds will not be available to cover this difference. The fees that you are charged must fit into your existing budget for travel/professional development and be considered before booking future trainings. Vouchers or credits issued due to a cancellation are intended to support the grant program's travel for future approved trainings and travel.

WILL WE BE ALLOWED TO SPEND MONEY ORIGINALLY GRANTED FOR CONFERENCES/TRAVEL ON OTHER COSTS?

Yes. We understand that your budgets were built with professional development costs in-mind and some subgrantees were awarded supplemental grants to support sending staff to specific trainings. These funds are still awarded to your grant to be spent during the obligation period and will not be requested for return. Keep in mind, transportation and equipment costs still have spending limits already reflected in your approved budget.

CAN WE USE OUR TRANSPORTATION FUNDS TO PAY TO DELIVER RESOURCES TO OUR STUDENTS?

Yes. You can use funds from your transportation budget to pay for transportation costs associated with delivering targeted services and resources, staying within the original grant purpose and serving intended grant beneficiaries.

CAN WE CONTINUE TO PAY RENTAL FEES ON SPACE NOT BEING OCCUPIED DUE TO LOSS OF OPERATIONS?

Reference: 200.446 (b)(2) Idle Facilities and Idle Capacity

Yes. You can continue to pay rental fees on idle facilities if they were necessary when acquired and are now idle because of changes in program requirements, efforts to achieve more economical operations, reorganization, termination, or other causes which could not have been reasonably foreseen.

WILL MY MONITORING VISIT STILL TAKE PLACE?

All monitoring visits will be moved to virtual meetings or desk audits. Your Out-of-School-Time Specialist will schedule a virtual meeting instead of an on-site visit. Only program directors are required to attend this meeting. Authorized representatives and other program staff are welcome to join the meeting but are not required to be in attendance, unless specifically asked to address fiscal or programmatic findings.

WHERE CAN I FIND THE MOST UP-TO-DATE INFORMATION?

Consulting with your local education agency and the local health department is advisable and encouraged. Please refer to the Governor's [website](#) as a centralized resource for up-to-date information.

WHO CAN SUBGRANTEES CONTACT FOR MORE INFORMATION AND ANSWERS TO ADDITIONAL QUESTIONS?

The 21st CCLC program team is listed below and we look forward to assisting you.

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