



## Frequently Asked Questions – 21<sup>st</sup> CCLC Grant Implementation

Please refer to the current [21<sup>st</sup> Century Community Learning Centers Subgrantee Manual](#) as the main source of information for grant implementation.

The questions and answers contained in this document are based on available information at the date of publishing.

### **Fiscal and Budget**

1. Can we buy Personal Protective Equipment (PPE), masks, disinfectant, sanitizer, protective table dividers and no contact temperature thermometers with 21<sup>st</sup> CCLC funds?  
**Yes, these items are allowable if the quantity and cost is deemed reasonable and necessary. Please contact your assigned Fiscal Analyst with detailed questions. 2 C.F.R. § 200.302(b)(7)**
2. We would like to start our program after Labor Day, Tuesday, September 8th or Monday, September 14th. Is this allowable? Will this affect our funding allotment? We would use August for our staff to plan.  
**Yes, the Georgia Department of Education is allowing 21<sup>st</sup> CCLC subgrantees flexibility with start dates for FY21. Delayed opening of 21<sup>st</sup> CCLC program sites will not impact the FY21 funding amount; however, 21<sup>st</sup> CCLC grant funds should be used in accordance with the approved grant application and to support active programming for students.**
3. If we were to submit the budget to GADOE (Con App) by July 30th, will we be required to have the program for the 2020-2021 school year?  
**Please continue to work on your FY21 program budget; however, the budget should not be submitted and entered into the Consolidated Application portal until FY21 plans for programming have been confirmed. Please contact your assigned Fiscal Analyst to discuss flexibility regarding FY21 budget deadlines.**
4. Will there be a reduction in funding due to the delayed start of the school year?  
**Generally, there will be no reduction in funding if an LEA 21<sup>st</sup> CCLC subgrantee is impacted by a delayed start of the LEA's regular school day operations. Non-LEA subgrantees impacted by changes in operational schedules should consider factors such as the subgrantee's organizational policies and procedures, and target populations (e.g. feeder schools). All subgrantees (LEAs, Non-LEAs, IHEs) should make (and document) a good faith effort to make up lost operational days, to the greatest extent possible should programming be feasible later in the FY21 academic year. Please keep your GaDOE ERES and Fiscal Analyst informed of program delays, or scheduling interruptions. *GaDOE Subgrantee Manual: B. Fidelity to Grant Application (page 12)***
5. What types of expenses represent allowable uses of carryover funds?  
**Carryover funds may be used for 21<sup>st</sup> CCLC program expenses that are deemed relevant and meet criterion of being reasonable and necessary for program operation. Additionally, expenses utilizing carryover funds will be evaluated for allowability. Your assigned Fiscal Analyst (and**

ERES) will provide feedback upon receipt and review of carryover budget amendments.  
*§200.403 Factors affecting allowability of costs.*

6. Could we suspend our 21<sup>st</sup> CCLC program for FY21? What would be the procedures to do so and what impact would doing so have on our grant?

Subgrantees may elect to suspend FY21 programming. Official written notification of the intent to suspend programming is required and must be submitted to the assigned ERES as soon as the decision is made. Should a subgrantee elect to suspend programming, all FY21 funding will revert to the Georgia Department of Education. Following the period of program suspension, grant funding would resume with the award for the FY22 school year (not inclusive of FY21 funding). *Subgrantee Operations Manual Section V. Fidelity to Approved Grant Application Part J. Program and Budget Amendments (see Appendix L)*

7. Would a program need to submit a budget amendment if FY21 programming begins as a traditional (on-site) afterschool program but later is changed to a virtual/remote afterschool program?

The Georgia Department of Education is aware that the uncertainty of planned program operations for FY21 may require subgrantees to shift from on-site to virtual programming, or to move from a virtual operations setting to an on-site model later in the academic year. Requirements for submission of a budget amendment may be impacted by various factors such as the nature and magnitude of proposed changes on budget allocation details, and the amount of flexibility retained within budget line item descriptions. Subgrantee should consult with the assigned ERES and Fiscal Analyst for guidance if there are planned changes to program delivery models. The assigned ERES and Fiscal Analyst will advise if an amendment is required. Proposed program delivery model changes may result in the required submission of a program *and* budget (combined) amendment. *GaDOE 21st CCLC Subgrantee Operations Manual J. Program and Budget Amendments (see Appendix L) (page 15)*

8. Can 21<sup>st</sup> CCLC pay for educational or enrichment kits to be sent home to students as a supplement to virtual programming?

Educational or enrichment kits are allowable as part of virtual programming. Grantees may offer alternative enrichment programming by providing students with “take-home” activities in the absence of onsite programming; however, subgrantees must be able to document assigned staff time and effort, and ensure that such alternative programming is allowable under the objectives of the approved grant application. Consistent with grant regulations, such programming must operate outside of day school hours (if the school is offering virtual learning) and must be available to all enrolled students to the best extent practicable. *GaDOE Subgrantee Manual under XI Financial Management Principles Under Use of Funds, Pages 30-34*

9. Are unused grant funds going to be added automatically to the overall award amount at the beginning of the fiscal year (original budget) within the Consolidated Application portal?

No. GaDOE will waive the annual 15% carryover percentage limitation for FY20 Title IV, Part B 21<sup>st</sup> CCLC subgrants. Subgrantees are permitted to carryover all unexpended funds from FY20 into FY21. The timeline for processing and adding carryover funds to the original (beginning of the year) budget amount in the GaDOE Consolidated Application portal is unlikely to change in

FY21. Processing of carryover funds is contingent upon subgrantee submission of the annual Completion Report by September 30, 2020, carryover calculation, and budget amendment review and approval processes. Prior to the aforementioned procedures, and before the exact amount of carryover is calculated, there is no process for accessing carryover earlier during the fall of FY20.

Subgrantees should consult with their assigned Fiscal Analyst when drafting their original FY21 budget, as there may be options for allocating funds to facilitate program plans and expenses in the fall via the original budget, thereby allowing other allocations to be postponed to a later time in the fiscal year (which may coincide with the availability of carryover and submission of carryover budget amendments). The assigned Fiscal Analyst will be able to consult with subgrantees to discuss the timing of such allocations. Discussion with the assigned Fiscal Analyst is recommended prior to postponing funding allocations. *GaDOE Subgrantee Manual under XII Grant Fund Management, E-Carryover Funds, Page 44-45.*

10. What information is required for the completion of detailed employee work logs when carrying out virtual or distance learning programming? What information and how much detail should be included in work logs?

Detailed work logs must provide an hour by hour breakdown of tasks that an employee completed in planning for, or delivering services to students, or participating in virtual professional development. Employees' detailed work log should include sufficient details for users of the document to determine the specific nature of the activities carried out during the time schools and programs are closed, or when the program (or the employee) is operating virtually and providing services remotely to students. Programs should consult with their assigned Fiscal Analyst to discuss questions regarding the completion of detailed work logs. *2 CFR §200.430 Compensation—personal services (h) (ii) (8) (I); GaDOE FAQ on School Closures - [School Closures website](#).*

## **Program Implementation**

1. How do we provide services to the students with no internet access? 70% of our students either live in an area where there is no connection, or they cannot afford internet service.  
All 21st CCLC subgrantees are encouraged to refer to your Local Educational Agency (LEA) to determine if they are providing digital learning devices to assist students in need. (ex., mobile hotspots and laptops). Purchase of internet hotspots and wireless internet access is an allowable use of federal funds with the following considerations:
  - The LEA has determined that the purchase is connected to the needs identified in the Consolidated LEA Improvement Plan (CLIP).
  - The LEA has determined that the purchase directly benefits the purpose of the grant (allocable) and only the eligible participants served by the grant.
  - The LEA has determined that the purchase is cost effective (reasonable and necessary).
  - The LEA has a plan for monitoring the dissemination of the equipment and ensuring the internet access is secured with passwords or other safety features to ensure use adheres to purpose of the grant, to the extent practicable.

- The LEA has included these items on the inventory log. (The LEA should maintain this documentation on file for monitoring purposes.)
- When budgeting, the equipment and wireless internet access must be separated by these budget codes: equipment 1000;615 or 1000;611 and access 1000;530.
- When budgeting, add general narrative explaining purpose.

*2 C.F.R. §§ 200.420-475 lists general allowability for selected items of costs. Section 4205 (a) of Title IV, Part B provides a list of authorized activities that subgrantees may carry out to advance academic achievement. In addition to our GaDOE staff, please refer to these sections when determining whether or not a particular cost is allowable. Page 34*

2. What are our options for students who do not have Wi-Fi or their own devices? All 21st CCLC subgrantees are encouraged to refer to your Local Educational Agency (LEA) to determine if they are providing digital learning devices to assist students in need. (ex., mobile hotspots and laptops)

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- The LEA has determined that the purchase is connected to the needs identified in the Consolidated LEA Improvement Plan (CLIP).
- The LEA has determined that the purchase directly benefits the purpose of the grant (allocable) and only the eligible participants served by the grant.
- The LEA has determined that the purchase is cost effective (reasonable and necessary).
- The LEA has a plan for monitoring the dissemination of the equipment and ensuring the internet access is secured with passwords or other safety features to ensure use adheres to purpose of the grant, to the extent practicable.
- The LEA has included these items on the inventory log. (The LEA should maintain this documentation on file for monitoring purposes.)
- When budgeting, the equipment and wireless internet access must be separated by these budget codes: equipment 1000;615 or 1000;611 and access 1000;530.
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3. If we start the year with in-person instruction but then transition to distance learning due to increases in community spread, how will we continue to serve our students? I understand that we could offer a virtual program. To be frank, we had a difficult time getting students to participate in required sessions for their regular classes this spring; I highly doubt they will choose to show up for in addition to their regular virtual school work.

Virtual learning activities should align with the goals and objectives outlined in the subgrantee's approved grant application. Subgrantees should review the recruitment and retention plans in the approved grant applications. Revisions to the plans may need to be developed and implemented for the virtual programming platform. Subgrantees are encouraged to contact other program directors and their designated Education Research and Evaluation Specialist to

discuss possible strategies for recruiting and retaining students. Subgrantees should also consider researching strategies dealing with successful implementation of virtual activities. *Georgia Department of Education Office of Federal Programs 21st Century Community Learning Centers 2019-2020 (FY20) Cohort Request for Proposal*

4. Can we decrease our enrollment requirements for each site? We are offering a virtual learning academy for students, so our in-person enrollment will be lower at each school. Therefore, I must assume our enrollment will be more difficult to maintain this year. Subgrantees must continue to make good faith efforts to serve the targeted students and number of students daily as listed in the approved grant applications.

The information provided in the Funding Request Worksheet (Appendix A) is considered the attendance objective, which is based on the number of students for which funding is requested. This number will be the basis for receiving allowable continuation awards, therefore applicants are strongly encouraged to assure that the number is realistic and attainable. Strategies utilized for recruitment should be credible and specific to the targeted population (e.g., grade level, native language, etc.). *Georgia Department of Education Office of Federal Programs 21st Century Community Learning Centers 2019-2020 (FY20) Cohort Request for Proposal*

5. Are teachers required to have yearly background checks, even if they have served as teachers in previous years? There are visitor restrictions in place at our local sheriff's office, where fingerprinting is done.

Yes. Annual national criminal background checks and fingerprints must be obtained prior to employment or participation in the program.

Included in the hiring process should be a clear set of procedures as to how the program management staff will conduct and use the results of national criminal background checks to deliver fitness determinations for the employment of all grant funded workers, including contractors, subcontractors, and regular volunteers (adults who have contact with student more than one time). *Georgia Department of Education Office of Federal Programs 21st Century Community Learning Centers 2019-2020 (FY20) Cohort Request for Proposal*

6. If we do have in-person instruction, can we amend our hours (i.e. 3:00-6:00 to 2:30-5:30) if our LEA is okay with that? The lateness of the day (especially after the time change in the winter) is a deterrent to keeping full enrollment.

Yes. Subgrantees may modify hours of operation provided to students. Subgrantees must determine if this is a permanent modification, which would require a program amendment or a temporary one due to COVID-19 pandemic. Subgrantees are encouraged to contact their designated Education Research and Evaluation Specialist to discuss proposed modifications to program hours. Modified program hours should be consistent with 21st CCLC grant administration guidelines and should occur outside of day school hours. Subgrantee Operation Manual Section V. Fidelity to the Approved Grant Application Part A - The US ED will not permit a subgrantee to change the project's scope, without an amendment approved by the GaDOE, that was originally outlined in the application and scored by the reviewers during the application reader scoring process.

7. How do we account for staff if our programming shifts to a virtual or hybrid instructional model?

Subgrantees must be able to document assigned staff time and effort. Grantees must maintain appropriate records and cost documentation as required by 2 CFR § 200.302 - Financial management and 2 CFR § 200.333 - Retention requirement of records to substantiate the charging of any salaries and benefit.

8. Is ADA a concern for enrollment at our sites? Our rural clubs' enrollment is very low. The virtual program is still running but the onsite participation is extremely low due to COVID-19. Subgrantees should make a good faith effort to recruit and retain the targeted number of students consistent with the approved 21st CCLC grant as well as grant administration guidelines; however, GaDOE will not penalize subgrantee due to low average daily attendance (ADA) given the potential impact of COVID-19. *Subgrantee Operations Manual Section V. Fidelity to Approved Grant Application Part B. Fidelity to Grant Application: Grant Application Components .*
9. What happens to our grant if our district decides to cancel all afterschool programming? Grantees may suspend 21st CCLC programming this year. Subgrantees must submit written notification that they plan to suspend programming for the 20-21 school year. However, funding for the program will be suspended until the 21-22 School Year. Please contact Deirdre Smith, Program Manager ([desmith@doe.k12.ga.us](mailto:desmith@doe.k12.ga.us)) for procedures to follow. *Subgrantee Operations Manual Section V. Fidelity to Approved Grant Application Part J. Program and Budget Amendments (see Appendix L).*
10. Can we suspend our 21st CCLC program this year? Grantees may suspend 21st CCLC programming this year. Subgrantees must submit written notification that they plan to suspend programming for the 20-21 school year. However, funding for the program will be suspended until the 21-22 School Year. Please contact Deirdre Smith, Program Manager ([desmith@doe.k12.ga.us](mailto:desmith@doe.k12.ga.us)) for procedures to follow. *Subgrantee Operations Manual Section V. Fidelity to Approved Grant Application Part J. Program and Budget Amendments (see Appendix L)*

### **General/Public Health**

1. Can we alternate days for student participation so we can practice social distancing? Yes. Programs are encouraged to follow school district's or governing organization's policies. Flexibility will be allowed to 21<sup>st</sup> CCLC programs to ensure guidelines concerning social distancing are met.
2. Depending on the participation of students and staff the 1st Semester, can we decide not to continue the program the 2nd Semester for the 2020-2021 school year? Programs are encouraged to follow the approved plan as much as possible. If a program decides to end programming, they are required to provide formal written notification to GaDOE of their intent to cease operation to GaDOE. All funding will cease once the programming stops and will not start again until programming resumes.
3. Do we have any flexibility with not providing the before school sessions this year? We foresee very little participation if we decide to use the virtual model.

Official written notification explaining the circumstance must be provided to GaDOE. Decisions will be made on a case by case analysis.

4. If our program delays the start of our program, how will this affect our 30 day checklist?  
30/60 day check lists will start from the program's actual start date.

5. What should detailed employee work logs look like for telework and /or remote learning sessions for 21<sup>st</sup> CCLC during the pandemic? What information and how much detail should we include?

Employee work logs must include the start time and the end time for each session or activity. Complete descriptions of each activity must include lesson plans for sessions and/or work description for the work being completed (planning, prep work, etc.). There must be a breakdown of dates, time and effort.

6. Are we required to adhere to the number of weeks and hours that were submitted in our original grant? (32 weeks/12 hours per week) Can we amend our grant to reflect our current situation?

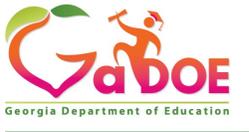
Programs are encouraged to follow the school district or governing organization's policies. Programs are also encouraged to follow their approved schedule to the best of their abilities. If there must be a temporary change in the approved schedule, the program must provide official notification to GaDOE detailing the reasons for the changes. Amendments are not required for temporary alterations to the approved grant application. *GaDOE Subgrantee Manual page 12.*

7. Can we make changes to the parts of the grant that outlined our desire to invite guest speakers/visitors/tutors to help with the program? Will we still be required to partner with outside agencies such as the YMCA as described in our original grant? Our LEA is limiting visitors and volunteers.

Programs are encouraged to follow the district's or governing organization's policies regarding such matters. Programs are encouraged to consider alternative options to continue providing these services to the students in the programs. If the grantee must make a change, a program amendment will be required and must follow the review and approval process outlined in the GaDOE Subgrantee Manual – Appendix L. *Subgrantee Operations Manual- Fidelity to Approved Grant Application- J. Program and Budget Amendments.*

8. Is the LEA allowed to change the scope of what we offer to students? For example, can they make the program add more hours of credit recovery beyond what we already offer?

Programs are encouraged to follow the approved plan from their application. Any change to the scope must be approved by GaDOE. If the grantee must make a change, a program amendment will be required and must follow the review and approval process outlined in the GaDOE Subgrantee Manual – Appendix L. *Subgrantee Operations Manual- Fidelity to Approved Grant Application- J. Program and Budget Amendments.*



9. We are being encouraged to eliminate situations where students are commingling -- that is, students should stay in their "bubble" with the same students as much as possible during the school day. This could limit our ability to rotate with enrichment activities, snack, homework time, meals, etc.

**Subgrantees are encouraged to follow school district or governing organization's policies. Programs are encouraged to create policies to address emergency closings in the future.**