

NITA M. LOWEY 21<sup>ST</sup> CENTURY COMMUNITY LEARNING CENTERS

# Subgrantee Guidance



IDAHO STATE DEPARTMENT OF EDUCATION  
STUDENT ENGAGEMENT | 21<sup>ST</sup> CCLC

650 W STATE STREET, 2ND FLOOR  
BOISE, IDAHO 83702  
208 332 6800 OFFICE / 711 TRS  
[WWW.IDE.IDAHO.GOV](http://WWW.IDE.IDAHO.GOV)

CREATED 09/26/2017  
UPDATED 03/12/2024

# TABLE OF CONTENTS

INTRODUCTION .....	5
Rational .....	6
ACCOUNTABILITY .....	7
<b>Authorized Statutes and Regulations</b> .....	7
<b>Internal Controls (2 C.F.R. §200.303)</b> .....	7
<b>Termination</b> .....	8
Measures of effectiveness .....	8
FEDERAL OBJECTIVES .....	9
STATEWIDE OBJECTIVES .....	10
Statewide policies .....	12
SAFETY.....	13
<b>Significant Program Impacts</b> .....	13
<b>Emergency Plan</b> .....	13
<b>Safety Drills</b> .....	13
<b>First Aid/CPR</b> .....	13
<b>Child Protective Act</b> .....	14
<b>Background/Fingerprints</b> .....	14
<b>Participant Emergency Information</b> .....	14
<b>Participant Transportation/Check-Out Policy</b> .....	14
FISCAL MANAGEMENT.....	14
<b>Supplement not Supplant</b> .....	14
<b>Sustainability</b> .....	15
<b>Subcontracting</b> .....	15
<b>Program Budgets</b> .....	15
Definitions.....	15
Approvals.....	16
Obligations.....	16
<b>Allowable/Unallowable Expenses</b> .....	17
FOOD PURCHASES .....	22

<b>Expenditures and Reimbursements</b> .....	23
Segregation of Expenses.....	24
<b>Time and Effort (2 C.F.R. §200.430(h)(8)(i))</b> .....	24
Annual Submission .....	24
<b>Program Inventory</b> .....	25
Inventory Records (2 C.F.R. §200.313(d)(1)) .....	26
Maintenance of Equipment (2 C.F.R. §200.313(d)(4)) .....	26
Record Retention (2 C.F.R. §200.334) .....	26
<b>Program Income</b> .....	27
Program Income Policy.....	27
Extended Services Request.....	27
<b>Annual Audit</b> .....	27
Local Education Agency (LEA) Subgrantees.....	27
Non-Local Education Agency Subgrantees .....	27
PROGRAMMATIC .....	28
<b>Targeted Services</b> .....	28
Program Schedule Requirements.....	28
Participants .....	29
Program Design .....	29
<b>Continuous Improvement</b> .....	30
Annual Performance Report.....	30
Risk Assessment and Monitoring .....	31
Evaluations.....	31
Professional Development .....	31
<b>Program Amendments</b> .....	32
COLLABORATION AND PARTNERSHIPS.....	33
<b>School Engagement</b> .....	33
School Day Staff Communication .....	33
School Day Activity Alignment.....	33

Private School Consultation..... 33

**Family Engagement** ..... 34

**Partnerships and Community Engagement**..... 35

    Memoranda of Understanding (MOU)..... 35

    Home School/Community Communication Outreach ..... 35

**Subgrantee Appeals**..... 35

    Appeals Process ..... 35

    Appeals Timeline ..... 35

# I Introduction

## INTRODUCTION

The Idaho State Department of Education (IDE) is the responsible State Educational Agency (SEA) for the Nita M. Lowey 21<sup>st</sup> Century Community Learning Centers (21<sup>st</sup> CCLC) program in Idaho.

21<sup>st</sup> CCLC is authorized under Title IV, Part B, of the Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA) of 2015.

The program supports the creation of community learning centers that provide academic and enrichment opportunities during non-school hours for children, primarily those who attend high-poverty and low-performing schools. The program helps students meet challenging state academic standards and local academic standards.

The purpose of 21<sup>st</sup> CCLC is three-fold:

1. Provide opportunities for academic enrichment. Including providing tutorial services to help students, particularly students who attend low-performing schools, to meet the challenging State academic standards (**ESSA, Sec. 4201(a)(1)**);
2. Offer students a broad array of additional services, programs, and activities, such as youth development activities, service learning, nutrition and health education, drug and violence prevention programs, counseling programs, arts, music, physical fitness and wellness programs, technology education programs, financial literacy programs, environmental literacy programs, mathematics, science, career and technical programs, internship or apprenticeship programs, and other ties to an in-demand industry sector or occupation for high school students that are designed to reinforce and complement the regular academic program of participating students; and (**ESSA, Sec. 4201(a)(2)**); and
3. Offer families of students served by community learning centers opportunities for active and meaningful engagement in their children's education, including opportunities for literacy and related educational development (**ESSA, Sec. 4201(a)(3)**).

In order to maximize federal funds and ensure that quality programs with a high need are funded, the IDE hosts a grant competition for eligible entities (**ESSA, Sec. 4204(b)**). The IDE selects eligible grants through a rigorous peer review process, which consists of stakeholders

from all regions of Idaho with experience in youth development, education, grant reviewing, and/or similar programming (**ESSA, Sec. 4204(e)**). Subgrantees that are awarded a 21<sup>st</sup> CCLC grant will have a period of performance of five years (**ESSA, Sec. 4203(a)(8)(A)**).

### Renewability of Awards

The IDE is not exercising its authority under the renewability provision of ESSA (**ESSA, Sec. 4204(j) and 4205(b)(2)(B)(iii)**) as of January 2024.

### Expanded Learning Program

At this time, the IDE does not have the capacity to offer expanded learning program activities as outline in **ESSA, Sec. 4204(a)(2)**.

## RATIONAL

The IDE is responsible for evaluating the effectiveness of programs and activities operated by the subgrantee, which includes data collection of measurements that:

- Align with the regular academic program of the school and the academic needs of participating students (**ESSA, Sec. 4203(a)(14)(A)**);
- Track student success and improvement over time (**ESSA, Sec. 4203(a)(14)(A)(i)**);
- Include State assessment results and other indicators of student success and improvement, such as improved attendance during the school day, better classroom grades, regular (or consistent) program attendance, and on-time advancement to the next grade level (**ESSA, Sec. 4203(a)(14)(A)(ii)**);
- For high school students, may include indicators such as career competencies, successful completion of internships or apprenticeships, or work-based learning opportunities (**ESSA, Sec. 4203(a)(14)(A)(iii)**).

21<sup>st</sup> CCLC grant awards are based on levels of service proposed in a grant application. As such, if objectives are not met the IDE reserves the right to reduce funding commensurate with the actual services being provided or terminate the grant entirely. The IDE is committed to supporting subgrantees not meeting requirements and objectives through technical assistance, support, and corrective action planning. A concerted effort will be made to assist subgrantees prior to any consequences being enacted.

To provide subgrantees cohesion, the policies and statewide objectives have been categorized by the six (4) sections found in *The Continuous Improvement Checklist*: Safety, Fiscal Management, governance, program, school linkages and family, youth and community engagement.

The IDE evaluates each subgrantee's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate monitoring (**2 C.F.R. §200.331(b)**). Effective risk assessments allow the IDE to identify specific areas of non-compliance to provide: (1) training and technical assistance on program-related matters; (2) on-site reviews; and (3) agreed-upon audit procedures (**§200.331(e)**). In order to better assist subgrantees, the IDE will use three tiers for risk assessment: low risk, moderate risk and high risk.

## ACCOUNTABILITY

*Programs have a governing board that establishes policies and procedures to promote continuous improvement and effectiveness of program.*

### Authorized Statutes and Regulations

This document is intended to be read in conjunction with the authorized statutes, and applicable regulations that are relevant to the 21<sup>st</sup> CCLC Grant:

- Legislation – [Title IV, Part B, 21st Century Community Learning Centers](#) (p.233-244), of the ESEA, as amended by the Every Student Succeeds Act (ESSA) (**20 U.S.C. 7171-7176**)
- [Uniform Grant Guidance](#) – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.
- [The Administrator's Handbook on EDGAR](#), 5<sup>th</sup> Edition
- Draft Non-Regulatory Guidance – 21<sup>st</sup> Century Community Learning Centers Non-Regulatory Guidance (October 2023) [DRAFT Non-Regulatory Guidance](#)
- Government Performance and Results Act (GPRA) – 21<sup>st</sup> Century GPRA Measures
- Idaho 21<sup>st</sup> CCLC Subgrantee Guidance
- 21<sup>st</sup> CCLC Grant Application and related revisions

### Internal Controls (2 C.F.R. §200.303)

- A process implemented by a non-federal entity, designed to provide reasonable assurance regarding the achievement of objectives in the following categories:

- Effectiveness and efficiency of operations;
- Reliability of reporting for internal and external use; and
- Compliance with applicable laws and regulations.
- Subgrantees must establish and maintain internal controls (**§200.303**) to ensure clear separation of duties:
  - Initiating transactions
  - Approving transactions
  - Recording transactions
  - Handling assets
  - Reviewing reports
- Internal Controls should also ensure:
  - Individual conducting procurement is not responsible for payment, and
  - Individual requesting transaction is not responsible for approving.

## Termination

If, after a reasonable period of technical assistance, a subgrantee is unable to meet any of the Federal and Statewide Policies, grant funds may be reduced or terminated.

- Termination (**2 C.F.R. §200.340(a)(1)(2)**): The federal award may be terminated in whole or in part as follows: (1) By the Federal awarding agency or pass-through entity (IDE), if a non-Federal entity fails to comply with the terms and conditions of a federal award, (2) by the Federal awarding agency or pass-through entity (IDE), to the greatest extent authorized by law, if an award no longer effectuates the program goals or agency priorities.

# II Measures of Effectiveness

## MEASURES OF EFFECTIVENESS

As outlined in ESSA, in order to meet the measures of effectiveness of the program, which is monitored by the State educational agency, such a program shall be based upon an established set of performance measures aimed at ensuring the availability of high-quality academic enrichment opportunities (**ESSA, Sec. 4205(b)**).



## FEDERAL OBJECTIVES

The US Department of Education (ED) has established performance objectives as part of the Government Performance and Results Act (GPRA).

Federal Objective	Measure	Data Collected / Who Collects
<b>GPRA Objective 1</b>	Percentage of students in grades 4-8 participating in 21 <sup>st</sup> CCLC programming during the school year and summer who demonstrate growth in reading and language arts and math on state assessments.	Participant EDUID/Subgrantee-EZ Reports ISAT and IRI Assessment Data/IDE- ISEE
<b>GPRA Objective 2</b>	Percentage of students in grades 7-8 and 10-12 participating in 21 <sup>st</sup> CCLC programming during the school year and summer with a prior-year unweighted GPA of less than 3.0 who demonstrated an improved GPA.	Participant EDUID/Subgrantee-EZ Reports Participant grades for prior year and current year of programming/Subgrantee- EZ Reports
<b>GPRA Objective 3</b>	Percentage of students in grades 1-12 participating in 21 <sup>st</sup> CCLC during the school year who had a school day attendance rate at or below 90% in the prior school year and demonstrated an improved attendance rate in the current school year.	Participant EDUID/Subgrantee-EZ Reports School Attendance Data/IDE- ISEE
<b>GPRA Objective 4</b>	Percentage of students in grades 1-12 attending 21 <sup>st</sup> CCLC programming during the school year and summer who experienced a decrease in in-school suspensions compared to the previous school year.	Participant EDUID/Subgrantee-EZ Reports School Suspension Data/IDE- ISEE
<b>GPRA Objective 5</b>	Percentage of students in grades 1-5 participating in 21 <sup>st</sup> CCLC programming in the school year and summer who demonstrated an improvement in the teacher-reported engagement in learning.	Teacher Surveys/Subgrantee- EZ Reports

**Important:** Subgrantee’s are required to collect and report demographic and outcome data for all Pre-Kindergarten, Home-school, and Private School participants. This data is not available for the IDE to collect via ISEE.

## STATEWIDE OBJECTIVES

To coincide with US Department of Education (ED) performance objectives, the Idaho 21<sup>st</sup> CCLC has established the following statewide objectives:

State Educational Agency Goal	Subgrantee Objective	Data Collected / Who Collects
<p><b>Academic</b></p> <p>Provide opportunities for academic enrichment to students in high-poverty, low-performing schools.</p>	<p>Offer at least one (1) academic opportunity each day.</p> <p>Program participants will show improvement/growth in academic content.</p>	<p>Academic Activity/Subgrantee- EZ Reports</p> <p>State Assessment (IRI/ISAT)/IDE- ISEE</p> <p>Teacher Reported Surveys/Subgrantee- EZ Reports</p> <p>Participant Grades/Subgrantee- EZ Reports</p>
<p><b>Enrichment</b></p> <p>Offer a broad array of additional services, programs, and activities that complement the regular school day.</p>	<p>Offer at least one (1) enrichment opportunity each day.</p> <p>Program participants will show improvement/growth in behavior.</p>	<p>Enrichment Activity/Subgrantee- EZ Reports</p> <p>Teacher Reported Surveys/Subgrantee- EZ Reports</p> <p>In-school Suspension/IDE- ISEE</p> <p>School Day Attendance/IDE- ISEE</p>

<b>State Educational Agency Goal</b>	<b>Subgrantee Objective</b>	<b>Data Collected / Who Collects</b>
<p><b>Family Engagement</b></p> <p>Offer families of student’s opportunities for active and meaningful engagement in their children’s education, including opportunities for literacy and related educational development.</p>	<p>Promote &amp; offer family engagement activities for families of student’s services that are focused on a child’s education and/or include literacy and related educational development:</p> <ul style="list-style-type: none"> <li>• Three (3) family literacy services.</li> <li>• Three (3) parent involvement opportunities.</li> </ul>	<p>Family Engagement Attendance/Subgrantee-EZ Reports</p>
<p><b>Targeted Services</b></p> <p>Target services to students who attend schools that (1) are implementing comprehensive support and improvement activities and (2) enroll students who may be at risk for academic failure, dropping out of school, involvement in criminal or delinquent activities, or who lack strong positive role models.</p>	<p>Offer a minimum of 100 days and a minimum of 300 hours of regular programming per school year</p> <p>Serve the proposed number students on a daily basis.</p>	<p>Program Calendar or Program Schedule/Subgrantee-EZ Reports</p> <p>Participant Attendance/Subgrantee-EZ Reports</p> <p>Participant Demographics/IDE- ISEE</p>
<p><b>Continuous Improvement</b></p> <p>Establish community learning centers that continuously improve operational efficiency to provide high quality programming for participants.</p>	<p>Offer all staff opportunities for professional development.</p> <p>Implement periodic evaluations of program and staff.</p> <p>Implement safety &amp; emergency plans, policies, and procedures.</p> <p>Submit complete and accurate data.</p> <p>Submit accurate, timely, and allowable reimbursements.</p>	<p>Staff Information &amp; PD/Subgrantee- EZ Reports</p> <p>Federal &amp; State APR/IDE- ISEE &amp; 21APR</p> <p>Reimbursement Requests/Subgrantee &amp; IDE- GRA</p> <p>Risk Assessments &amp; Monitoring Compliance Documents/Subgrantee &amp; IDE</p>

State Educational Agency Goal	Subgrantee Objective	Data Collected / Who Collects
<p><b>Summer Program</b></p> <p>Establish community learning centers that provide academic enrichment opportunities to students during the summer months.</p>	<p>Offer at least one (1) academic and one (1) enrichment opportunity for participants each day.</p> <p>Offer one (1) family literacy service.</p> <p>Offer one (1) Professional development opportunity related to summer programming.</p> <p>Offer a minimum of 40 hours of summer programming</p>	<p>Academic &amp; Enrichment Activity/Subgrantee- EZ Reports</p> <p>Participant Attendance/Subgrantee- EZ Reports</p> <p>Participant Demographics/IDE- ISEE</p> <p>Family Engagement Attendance/Subgrantee- EZ Reports</p> <p>Staff Information &amp; PD/Subgrantee- EZ Reports</p> <p>Teacher Reported Surveys/Subgrantee- EZ Reports</p> <p>In-School Suspension/IDE- ISEE</p> <p>Grades/Subgrantee- EZ Reports</p> <p>State Assessment (IRI/ISAT)/IDE- ISEE</p>

**Important:** Subgrantee’s are required to collect and report demographic and outcome data for all Pre-Kindergarten, Home-school, and Private School participants. This data is not available for the IDE to collect via ISEE.

# III Statewide Policies

## STATEWIDE POLICIES

The following statewide policies are required for current 21<sup>st</sup> CCLC subgrantees to meet during their entire period of performance. The sections have been split by the four (4) sections of the

monitoring tool used by the Idaho Department of Education; *The Continuous Improvement Checklist*.

## **SAFETY**

*Programs provide safe, healthy and developmentally appropriate learning environments for all participants. All programs are expected to have well-documented policies and procedures that cover the day-to-day operations of the program as well as any emergency or special-need situations.*

### **Significant Program Impacts**

Subgrantees must notify the IDE of any significant changes or impacts to the 21<sup>st</sup> CCLC grant (ex. change of center location, extended program closure, violent incident, turnover of director, student/staff suicide or sudden death, natural disaster, arrest of any program staff for any reason, etc.).

### **Emergency Plan**

All subgrantees are required to develop a formal, written emergency readiness plan that is specific and applicable to the afterschool program needs. It may be appropriate to reference school district's or organization's emergency plan but should be a customized plan for the 21<sup>st</sup> CCLC program. At a minimum, emergency plans must establish written procedures for:

- Emergency protocols such as fire drill and lockdown; and
- Emergency staffing plans
- Emergency plans to address programmatic, staffing, and health plans in the event of a pandemic

### **Safety Drills**

Each center/site is required to have a minimum of one (1) fire drill and one (1) lockdown drill annually. These drills must take place during typical program operating hours. Subgrantees are required to enter documentation in the EZ Reports data management system.

### **First Aid/CPR**

Each center/site is required to have a minimum of two (2) staff certified in First Aid & CPR. Subgrantees are required to enter documentation in the EZ Reports data management system.

## Child Protective Act

All staff are required to be trained in their obligation of reporting child abuse according to [Idaho Code 16.1605](#). Subgrantees must document evidence of training. Examples of accepted evidence include but are not limited to: Staff handbooks, training agendas, sign in sheets, and entry into EZ Reports as professional development.

## Background/Fingerprints

All subgrantees are required to conduct fingerprinting and background checks for prior criminal records, child protective service findings and other improper conduct. Fingerprinting and background checks are required for all paid staff, including outside providers. (**ESSA, Sec. 4204(b)(2)(A)(i)**).

## Participant Emergency Information

All subgrantees are required to have up-to-date emergency information, including medical information, primary and alternative contact information for each program participant. This information needs to be on file and accessible for all program staff (**ESSA, Sec. 4204(b)(2)(A)(i)**).

## Participant Transportation/Check-Out Policy

All subgrantees are required to have an age-appropriate system to ensure that children receive safe, adequate and sufficient transportation between the program and home; and are signed out by a parent/guardian or other parent/guardian approved person.

## FISCAL MANAGEMENT

*Programs follow sound business principles, establish strong internal controls, and operate efficiently within the allotted and approved budget. Programs have proper internal controls to ensure proper management of federal grant funds and follow applicable federal and state guidelines.*

## Supplement not Supplant

Subgrantees must utilize funds to supplement, and not supplant, other federal state, local and non-public funds to provide allowable programs and activities **§4203(a)(9) and §4204(b)(2)(G)**.

## Sustainability

Subgrantees are required to have a preliminary plan for how the program will continue after grant's period of performance closes (**ESSA, SEC. 4204 (b)(2)(K)**).

## Subcontracting

21<sup>st</sup> CCLC grant funds may be sub-contracted for the provision of program services that the subgrantee is unable to provide. A formal vendor service agreement (contract) must be in place prior to any services provided or payments. The agreement shall include the following items:

- Detailed scope of work – responsibilities of both parties;
- Invoicing and reporting timeline and format;
- Submission of background check documentation of all individuals that will have contact with 21<sup>st</sup> CCLC program participants.

## Program Budgets

### Definitions

- **Personnel (2 C.F.R. §200.430)**: Costs incurred for employment people to meet the goals and objectives of program operations.
- **Fringe Benefits (2 C.F.R. §200.431)**: Cost incurred that supplement an employee's salary such as health insurance, retirement, PERSI, and so forth.
- **Travel/Professional Development (2 C.F.R. §200.475)**: Costs incurred for employees to participate in training, professional development, and conferences. Costs may include travel, per diem, lodging, registration fees, conferences (**2 C.F.R. §200.432**), and other such costs.
- **Supplies (2 C.F.R. §200.314 and 2 C.F.R. §200.453)**: All tangible personal property other than those described in equipment is a supply if the per-unit acquisition cost is less than \$500.
- **Equipment (2 C.F.R. §200.313 and 2 C.F.R. §200.439)**: All (1) tangible personal property having a useful life of more than one year and (2) a per-unit acquisition cost which equals or exceeds \$500. All computing devices are classified as an equipment cost. Idaho 21<sup>st</sup> CCLC has a more restrictive equipment cost definition than what is outlined in *Uniform Grant Guidance – EDGAR*.
- **Purchased Services**: Costs incurred when purchasing a service, which includes contracts (**§200.320**) – a legal instrument by which the subgrantee purchases property or services needed to carry out the program project.

- *Transportation*: Costs incurred for the transportation of program participants to travel safely to and from the 21<sup>st</sup> CCLC site and off-site locations including academic enrichment activities and home. This may include mileage reimbursement, contracted bus driver services, and flat bus rates.
- *Indirect Cost (2 C.F.R. §200.414)*: Costs incurred (1) for a common or joint purpose benefitting more than one cost objective, and (2) not readily assignable to the cost objectives specifically benefitted. Subgrantees are required to follow the restricted indirect cost rate of their district or organization. If the subgrantee does not have a negotiated restricted indirect cost rate verified by the state or federal entity, then indirect rates will not be allowable for reimbursement. For all non-LEA subgrantees, they may use their original grant application budget to request a negotiated rate from the state to use during the period of performance. All non-LEA subgrantees must not exceed an eight percent indirect cost rate unless a lower rate has been determined by the state or federal entity. (**§76.564(c)(2)**)

### Approvals

- Subgrantees are required to submit a budget proposal for the upcoming fiscal year by May 30 of each program year.
- All project costs must be reasonable (**2 C.F.R. §200.404**), necessary, allocable (**2 C.F.R. §200.405**), and allowable (**2 C.F.R. §200.420 - §200.475**).
- Items listed in budget workbook submitted for approval should include details (except consumables). All budget items that are not detailed will require prior approval by the IDE before obligating 21<sup>st</sup> CCLC funds. If field trips or equipment are detailed in the approved budget workbook, no further approval is necessary before purchase.
  - Field Trips – If not detailed in approved budget, subgrantees will need to submit a *Field Trip Request Form* two weeks before the trip date for approval.
  - Equipment Purchases – Per unit costs that are \$500 or more require three quotes to be submitted to the IDE for approval before purchasing equipment.
- Any costs that are unallowable must be returned or reimbursed by the subgrantee.

### Obligations

- Obligations are orders placed for property or services, contracts, and similar transactions during a given period that requires payment during the same or a future period.
- Subgrantees are required to obligate all funds for the fiscal year by no later than June 30<sup>th</sup>. Any unobligated balances will be returned to the State.



- The following table illustrates when funds are determined to be obligated under federal regulations:

If the obligation is for:	Then obligation is made:
Acquisition of property	On the date which the LEA makes a binding written commitment to acquire the property
Personal services by an employee of the LEA	When the services are performed
Personal services by a contractor who is not an employee of the LEA	On the date which the LEA makes a binding written commitment to obtain the services
Public utility services	When the LEA receives the services
Travel	When the travel is taken
Rental of property	When the LEA uses the property
A pre-agreement cost that was properly approved by the Secretary under the cost principles in <b>2 CFR part 200, Subpart E-Cost Principles</b> .	On the first day of the project period

### Allowable/Unallowable Expenses

All expenses should follow Statutory Requirements outlined in *Elementary and Secondary Education Act, Sec. 4205(a)* - Authorized Activities.

The table below includes a list of common allowable and unallowable expenses with 21<sup>st</sup> CCLC grant funds (for a more detailed list see *EDGAR, 5<sup>th</sup> Edition, p. 138-184*):

Cost	Status	Citation	Notes
Activities with dangerous weapons	Unallowable	<b>2 C.F.R. §200.403</b>	<p>Per S. 2938, the Bipartisan Safer Communities Act, Section 13401 states: No funds under the ESEA may be used for the provision to any person of a dangerous weapon, as defined in <b>18 U.S.C. 930(g)(2)</b>, or training in the use of a dangerous weapon.</p> <p>As of 10/6/23 a bill amending section 8526 of the ESEA clarifies that the prohibition does not apply to the use of ESEA funds for activities that are carried out under ESEA programs and that are otherwise permissible, and that “provide students with educational instruction or educational enrichment activities, such as archery, hunting, other shooting sports, or culinary arts.</p>
Advertising & Public Relations	Allowable with Restriction	<b>2 C.F.R. §200.421</b>	For recruitment of personnel, procurement of goods or services, or disposal of scrap metal.
Advisory Councils	Allowable with Restriction	<b>2 C.F.R. §200.422</b>	N/A
Alcoholic Beverages	Unallowable	<b>2 C.F.R. §200.423</b>	N/A
Alumni/ae Activities	Unallowable	<b>2 C.F.R. §200.424</b>	N/A

<b>Cost</b>	<b>Status</b>	<b>Citation</b>	<b>Notes</b>
Conferences	Allowable	<b>2 C.F.R. §200.432</b>	Must align with original grant goals and objectives.
Contributions & Donations	Unallowable	<b>2 C.F.R. §200.434</b>	Goods created with supplies purchased using 21 <sup>st</sup> CCLC funding are not allowed to be donated. This includes items created and given out through service learning projects.
Capital expenditures for general purpose equipment, buildings, and land	Unallowable	<b>2 C.F.R. §200.439</b>	N/A
Capital expenditures for special purpose equipment	Allowable with Restriction	<b>2 C.F.R. §200.439</b>	Equipment purchases are allowable with prior approval.
Curriculum	Allowable	N/A	N/A
Decorative Items	Unallowable	N/A	This includes office, classroom and event décor.
Entertainment	Allowable with restriction	<b>2 C.F.R. §200.438</b>	Costs for entertainment, amusement, diversion, and social activities, except where specific costs that might otherwise be considered entertainment have a programmatic purpose and have prior written approval.
Facilities	Unallowable	N/A	Facilities is defined by land, buildings, and any portion thereof, equipment individually or collectively or any other tangible capital

Cost	Status	Citation	Notes
			asset, wherever located, and whether owned or leased by the non-federal entity.
Fund Raising and Investment Management Costs	Unallowable	<b>2 C.F.R. §200.442</b>	N/A
Gifts	Unallowable	N/A	This may include incentives, prizes, gift cards, awards, and other items that appear to be gifts.
Goods or Services for Personal Use	Unallowable	<b>2 C.F.R. §200.445</b>	N/A
Government Costs	Unallowable	<b>2 C.F.R. §200.444</b>	N/A
Grant Writing Services	Unallowable	N/A	N/A
Incentives	Unallowable	N/A	N/A
Indirect Costs	Allowable with Restriction	<b>2 C.F.R. §200.414</b>	Indirect Cost ( <b>2 C.F.R. §200.414</b> ): Cost incurred (1) for a common or joint purpose benefitting more than one cost objective, and (2) not readily assignable to the cost objectives specifically benefitted. Subgrantees are required to follow the restricted indirect cost rate of their district or organization. *See indirect cost definition for additional guidance.
Lobbying	Unallowable	<b>2 C.F.R. §200.450</b>	N/A
Membership, Subscriptions and	Allowable with Restriction	<b>2 C.F.R. §200.454</b>	Prior approval by the Federal Award Agency.

<b>Cost</b>	<b>Status</b>	<b>Citation</b>	<b>Notes</b>
Professional Activity Costs			
Maintenance and Repair Costs	Allowable with Restriction	<b>2 C.F.R. §200.452</b>	Prior approval by the Federal Award Agency.
Participant Support	Allowable with Restriction	<b>2 C.F.R. §200.456</b>	Prior approval by the Federal Award Agency.
Personnel & Fringe Benefits	Allowable	N/A	N/A
Program Operations that take place during the regular school day	Unallowable	<b>Sec. 4201(b)(1)(A)</b>	N/A
Remodeling Existing Facility Costs	Allowable with Restriction	<b>2 C.F.R. §200.462</b>	Rearrangement and reconversion costs are allowable with prior written approval from the IDE. All requests must not add monetary value to existing property.
Rental Costs of Real Property and Equipment	Allowable with Restriction	<b>2 C.F.R. §200.465</b>	Rates are comparable to that of other rental property in the locale. Will only reimburse the percentage of 21 <sup>st</sup> CCLC only space/activities.
Scholarships and Student Aid	Allowable with Restriction	<b>2 C.F.R. §200.466</b>	Prior approval by the Federal Award Agency.
Selling and Marketing	Unallowable	<b>2 C.F.R. §200.467</b>	N/A
Student Activity Costs	Unallowable	<b>2 C.F.R. §200.469</b>	N/A

Cost	Status	Citation	Notes
Supplies and Materials	Allowable	<b>2 C.F.R. §200.314</b>	N/A
Training and Education (Professional Development)	Allowable	<b>2 C.F.R. §200.473</b>	N/A
Transportation	Allowable	<b>2 C.F.R. §200.474</b>	N/A
Travel	Allowable	<b>2 C.F.R. §200.475</b>	Allowable for transportation, lodging, per diem, and related items incurred by employees traveling on official business.
T-Shirts	Unallowable	N/A	N/A
Vehicle	Unallowable	N/A	N/A

## FOOD PURCHASES

Subgrantees are required to provide meals and snacks to students using the Child and Adult Care Food Program (CACFP) and other USDA Afterschool Snack Programs where applicable. Subgrantees are encouraged to seek other resources outside 21<sup>st</sup> CCLC grant funds for food expenses. For more information refer to the 21<sup>st</sup> CCLC Food FAQ Document.

### After School Snack and Meals

- Typically, 21<sup>st</sup> CCLC grant funds may not be used for afterschool snack & meals, specifically if the targeted school meets the requirements (school is 50% or higher of free/reduced lunch enrollment) to be area eligible for afterschool snack programs.
- An overview of the Afterschool Snack Program can be found on the IDE's [Child Nutrition Program Website](#)
- However, subgrantees may use 21<sup>st</sup> CCLC grant funds to cover snack when a target school:
  - Is not 50% or higher of free/reduced lunch, and

- Has documentation of exhausting all other possibilities for afterschool snacks. Subgrantees that use 21<sup>st</sup> CCLC grant funds for snack purchases MUST:
  - Operate through their food service program; and
  - Be reimbursed according to the per student cost of the afterschool snack program.
  - Receive prior written approval from the IDE.

### Staff Snack and Meals

- Subgrantees must adhere to the guidance provided by the US Department of Education: *Using Federal Grant Funds to Pay for Food (EDGAR, 5<sup>th</sup> edition, 2020, p.256)*.
- Subgrantees are required to follow Idaho Department of Education policy for all staff trainings and professional development:
  - The meeting has a published agenda and attendance is mandatory.
  - The meeting has an intended duration of six (6) hours or more as shown on the agenda.
  - There are five (5) or more attendees.
  - The meeting's purpose is furthered by presentations or interpersonal exchange during the meal period, and the agenda clearly outlines the working meal(s).
  - Formal sign-in sheet for the designated meeting (*Idaho State Department of Education Accounting Handbook, 2015, p. 22*).
- Food associated with business lunches, staff meetings, advisory board or staff lunches during day field trips are unallowable and will NOT be eligible for reimbursements.

### Family Engagement Event Meals

It is allowable for subgrantees to purchase food for family engagement activities if they meet all of the following criteria:

- The event is scheduled during typical breakfast, lunch or dinner hours and it is needed to encourage participation.
- All food costs must be reasonable, necessary, allowable and allocable as defined by the Uniform Guidance in **2 C.F.R. §200.403-200.405**.
- Receive prior written approval from the IDE.

### Expenditures and Reimbursements

- Expenditures must follow the guidelines listed in the Budget Definitions.
- Expenditures must be clearly tied to goals and objectives of the program.

- Supporting documentation for expenditures is required for reimbursement: (1) fiscal expenditure report and (2) *Budget Workbook*. The IDE reserves the right to request documentation of invoices with check numbers, payroll records and timesheets, bank statements, lesson plans and schedules, attendance records, and other related documentation as needed.

The IDE recommends that subgrantees submit reimbursement requests monthly and at a minimum quarterly.

Date	Description	Failure to Meet
December 31 March 31 June 30 September 30	Quarterly Drawdowns must be submitted in GRA and documentation emailed to IDE.	Risk Assessment points will be assigned to subgrantees that do not meet any of the quarterly drawdown deadlines.
June 30	100% of grant funds obligated.	Purchases obligated after date will not be reimbursed.
September 30	100% of grant funds submitted to GRA for reimbursement.	Un-obligated or non-requested funds will be returned to the State.

### Segregation of Expenses

All expenses charged to 21<sup>st</sup> CCLC must be segregated from other expenses within the subgrantee’s financial system.

## Time and Effort (2 C.F.R. §200.430(h)(8)(i))

### Annual Submission

All subgrantees are required to submit Time & Effort documentation annually. Time & Effort documentation must be submitted by October 31 of each program year. Additionally, if there are any new employees or changes in assignments of current employees, the subgrantee must submit Time & Effort documentation before being reimbursed for salaries and/or benefits.

All employees who are paid in full or in part with federal funds must keep specific documents to demonstrate the amount of time they spent on grant activities. This also includes an employee whose salary is paid with state or local funds but is used to meet a required “match” in a federal program. These documents, known as time and effort records, are maintained in order to charge the costs of personnel compensation to federal grants.



- Charges to federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:
- Be supported by a system of internal controls which provides reasonable assurance that the charges are accurate, allowable, and properly allocated;
- Be incorporated into official records;
- Reasonably reflect total activity for which the employee is compensated, not exceeding 100% of compensated activities;
- Encompass both federally assisted and all other activities compensated by the LEA on an integrated basis;
- Comply with the established accounting policies and practices of the LEA; and
- Support the distribution of the employee’s salary or wages among specific activities or costs objectives.
- Subgrantees that operate multiple grants are required to track and bill employee time and effort according to the specific award. However, to ease the burden on subgrantees, the IDE allows administration costs (such as program director, business manager, and other positions that have responsibilities that overlap between multiple grants) to track their time and effort as one cost objective (**2 C.F.R. §200.28** and cross reference with *U.S. Department of Education Guidance: Actions to Ease the Burden of Time and Effort Reporting (Sep. 7, 2014)*).

**Important: Subgrantees can use their current Time & Effort documentation, but 21<sup>st</sup> CCLC has templates available for accuracy.**

## Program Inventory

21<sup>st</sup> CCLC subgrantees are required to establish a written inventory procedure, which identifies:

- The process performed when property is received;
- Where the property is received;
- What position inspects the property to make sure it is in good condition and matches what is listed on the purchase order and invoice; and
- What type of property is tagged.
- The process performed for Physical Inventory (**2 C.F.R. §200.313(d)(2)**):
  - What position performs the physical inventory;
  - When the inventory is performed;
  - How the reconciliation is performed between the physical inventory and the property records.

### **Inventory Records (2 C.F.R. §200.313(d)(1))**

Subgrantees must maintain inventory records of items purchased with 21stCCLC funds

- For each equipment and computing device purchased with 21<sup>st</sup> CCLC grant funds, the following information is maintained:
  - Serial number or other identification number;
  - Source of funding for the property;
  - Who holds the title;
  - Acquisition date;
  - Cost of the property;
  - Percentage of federal participation in the project costs for the federal award under which the property was acquired;
  - Location, use and condition of the property; and
  - Any ultimate disposition data including the date of disposal and sale price of the property.
- The IDE has provided an inventory template which subgrantees are to utilize to ensure all the required information is provided.
- A physical inventory of the property must be taken and the results reconciled with the property records at least yearly.
- A physical inventory of the property purchased and retained over the five-year grant cycle must be submitted June 30<sup>th</sup> of the grants sunseting year.

### **Maintenance of Equipment (2 C.F.R. §200.313(d)(4))**

A subgrantee must also maintain adequate maintenance procedures to ensure that property is kept in good condition:

- Lost or Stolen Items (**2 C.F.R. §200.313(d)(3)**),
- Use of Equipment (**2 C.F.R. §200.313(c)**), and
- Disposition of Equipment (**2 C.F.R. §200.313(e)**).

### **Record Retention (2 C.F.R. §200.334)**

Subgrantees are required to maintain all:

- Financial Records – (1) the amount of funds under the award, (2) how the subgrantee used those funds, (3) the total cost of each project, (4) the total match/in-kind cost of each project, and (5) other records to facilitate an effective audit.
- Project Experience Records – (1) the results of grant goals and objectives, (2) State & Federal Annual Reports, (3) monitoring reports, (4) evaluation reports, and (5) other records to facilitate an effective audit.

Subgrantees are required to maintain records for a period of three years from the date of submission of the final expenditure report.

## Program Income

### Program Income Policy

**Important:** The IDE will NOT approve Program Income Plans for subgrantees. All 21<sup>st</sup> CCLC programming will be NO charge during 21<sup>st</sup> CCLC program designated times and days.

- Subgrantees are NOT allowed to charge a fee for services. The IDE does not approve subgrantees to collect or generate Program Income.
- Program Income generated without written prior approval from the Department must be deducted from the funds awarded under the Federal grant. **(2 CFR §200.307(b))**

Examples of Program Income include the following:

- Fundraising through supported program activities or use of 21<sup>st</sup> CCLC funding.
- Collection or generation of co-pays or parent fees for any program participant.
- Collection or generation of parent fees for field trips or special activities.

### Extended Services Request

Subgrantees that intend to extend services outside of designated 21<sup>st</sup> CCLC times and days of service is required to submit the *Extended Services Request Document* to the IDE for approval.

## Annual Audit

All 21<sup>st</sup> CCLC sites are required to implement a financial audit on an annual basis. Non-LEA entities must provide the IDE with all audit findings, reports, and materials.

### Local Education Agency (LEA) Subgrantees

Annual Audit for Local Education Agency Subgrantees including School Districts and Charter Schools

- Audits under these requirements are performed by Idaho Department of Education's School Finance Department. The IDE has access to all LEA annual audits and no further action is needed by the subgrantee.

### Non-Local Education Agency Subgrantees

Annual Audit for Non-Local Educational Agency Subgrantees including Community-Based and Faith-Based Organization

- Audits under these requirements are to be performed by independent auditors in accordance with generally accepted auditing standards, as defined by the United States general accounting office. The subgrantee may include expenses in annual budget for carrying out the provisions of this section.
- The entity shall file one (1) copy of each completed audit report with the IDE 21<sup>st</sup> CCLC within three (3) months after the end of the audit period. The minimum requirements for any audit performed under the provisions of this section are:
  - The governing body of a local 21<sup>st</sup> CCLC subgrantee whose annual expenditures from 21<sup>st</sup> CCLC funds exceed two hundred thousand dollars (\$200,000) shall cause a full and complete audit of its financial statements to be made each fiscal year.
  - The governing body of a local 21<sup>st</sup> CCLC subgrantee whose annual expenditures from 21<sup>st</sup> CCLC funds are less than two hundred thousand dollars (\$200,000) shall cause a full and complete audit of its financial statement to be made each even year of funding. Community Based Organizations may obtain a third-party financial review in lieu of a complete audit if their annual award is less than two hundred thousand dollars (\$200,000).

## PROGRAMMATIC

*Programs offer a variety of activities that are active, developmentally appropriate and enrich the whole child (physical, social, emotional and creative development). Programs should be intentional, well-designed, taught by qualified instructors, and meet the needs of all students in that community.*

### Targeted Services

#### Program Schedule Requirements

- Subgrantees are required to provide programmatic services no less than:
  - School Year Program: 100 days and a minimum of 300 hours per year.
  - Summer Program: 40 hours (no requirement on days served)
- Subgrantees may offer programmatic services: after school, before school, holidays and weekends, and non-school weekdays.
- Subgrantees failing to meet timeframe of services will be required to submit a written explanation of why timeframe requirements have not been met and a detailed action plan to increase the hours or days of operation to meet the required levels of service.

## Participants

### Participant Attendance

- Subgrantees must adhere to the fundamental program requirements by serving the number of participants proposed in the original grant application. Either criteria below must be met each program year:
  - **Average Daily Attendance (ADA)**
  - **Hour Band Attendance (minimum 90+ hours)**
- Subgrantees will be evaluated on this progress two times per year: (1) mid-year and (2) end-year
- Subgrantees that do not meet the benchmarks outlined for attendance may receive a reduction in funds to reflect the actual levels of operation. The IDE will provide notification and technical assistance within a reasonable timeframe before any reduction in funding or termination of grant is made. Any reduction in funding will be effective in the upcoming program year.

### Participant Recruitment

- All 21<sup>st</sup> CCLC funded programs must have a plan to serve a diverse student population that is reflective of the school, including children with specialized learning needs, students at risk of academic failure, or students at risk of dropping out.

## Program Design

### Program Components/Academic Enrichment

- Each program day, programs must provide participants opportunities:
  - Academic activities, including tutoring services and homework help; and
  - A broad array of enrichment activities (**ESSA, Sec.4205(a)**).

### Field Trips

- Subgrantees are encouraged to expose students to learning in a variety of different settings and opportunities.
  - Field trips are allowable if they are linked to academic learning and contribute to meeting the program goals outlined in the original grant application.
  - Field trips for entertainment purposes are unallowable.
  - Prior IDE approval for field trips are required. To ensure eligibility for reimbursement field trips must either be approved in your annual budget

workbook, or subgrantee must submit a Field Trip Request Form for approval, at least two weeks prior to the Field Trip.

- Field trips must:
  - Be linked to an academic unit.
  - Follow district/organization policies.
- Subgrantees must submit a Field Trip Request Form along with district/organization approval to the IDE two (2) weeks in advance for any field trip that is:
  - Outside the State of Idaho; or
  - Overnight.
- Subgrantees must maintain documentation of how field trips fit into academic learning as well as costs associated with the trip (e.g. transportation, entry fees, and other associated costs). All costs associated with field trips such as entry fees must be accurately supported by attendance records.

***Important:*** The IDE has provided further guidance for field trip snacks and meals in the Food Frequently Asked Questions document

### Behavioral Policy

- All subgrantees must have documented behavioral policies and procedures in place for program participants.
- All behavioral guidelines must be disseminated to all parents/guardians of participants in a clear and accessible manner. (Ex: Student/parent handbooks, orientation meetings, etc).

### Youth Voice

- All subgrantees are encouraged to seek youth input with program design, program policies, and family engagement activities.

## Continuous Improvement

### Annual Performance Report

Subgrantees must certify annual performance data through EZ Reports at the end of each programmatic year to ensure that federal and statewide objectives have been met

- Subgrantees must enter all data in our 21<sup>st</sup> CCLC Data Management System, EZ Reports. All data must be current by the end of month. IDE will conduct data checks the first week of each month for the previous programming month data.
- Subgrantees are encouraged to attend monthly virtual EZ Reports Office Hours

## Risk Assessment and Monitoring

The IDE will assess risk for all subgrantees yearly using the *Risk Assessment Tool*. Subgrantees that are medium to high risk will be selected for monitoring. All subgrantees will be monitored by the IDE at least once during their period of performance (even if not medium or high risk).

- Subgrantees that will be monitored are notified by a formal letter in the fall each year.
- The IDE will provide a technical assistance webinar about the monitoring process, monitoring tools, and how to submit documentation in winter each year.
- Subgrantees will have sixty days to gather and submit documentation.
- The IDE will conduct a desk audit of all submitted documentation and schedule a follow up virtual monitoring call to discuss documentation and any findings.
- The subgrantee will have ten days to provide any additional documentation needed discussed in the monitoring call.
- The IDE and subgrantee will determine a date and time for the IDE to conduct a site visit.
- The IDE will provide a formal follow up letter to the subgrantee with any findings and will review this letter at the site visit.
- The Subgrantee will have thirty days to submit a corrective action plan.

## Evaluations

### Staff Evaluations

Staff receive annual evaluations specific to their performance working within the 21<sup>st</sup> CCLC program. For staff who work multiple programs (ex. a school day teacher who also works 21<sup>st</sup> CCLC program after school), a separate evaluation, or section of the full annual evaluation, must evaluate their time spent working in 21<sup>st</sup> CCLC programs.

### Program Evaluations

Subgrantees must undergo periodic evaluations of program and staff to work for continuous improvement (**ESSA, Sec. 4205(b)**). The IDE recommends that subgrantees perform internal evaluations of program and staff on a yearly basis. The subgrantee may choose the evaluation process that works best to address the criteria of the program and staff.

## Professional Development

### Required Meetings

Subgrantees are required to participate in IDE meetings. The IDE hosts three (3) in-person statewide annual meetings for program directors and monthly virtual director meet-ups:

- **21<sup>st</sup> CCLC New Subgrantee/Director Meeting:** A one to two-day, in-person meeting that occurs in late summer/early school year to provide new 21<sup>st</sup> CCLC subgrantees information

on specific policies, requirements, and regulations. The goal of this meeting is to provide new subgrantees/directors the opportunity to receive technical assistance in a smaller group setting. Required to attend:

- New subgrantees.
  - New program directors (directors with less than one-year of 21<sup>st</sup> CCLC experience).
  - As requested by IDE.
  - As requested by subgrantee.
- **21<sup>st</sup> CCLC Fall Director Meeting:** A one to two-day, in-person meeting that occurs in early fall to provide all 21<sup>st</sup> CCLC subgrantees updates, requirements, best-practices, and collaboration opportunities.
  - **21<sup>st</sup> CCLC Spring Director Meeting:** A one to two-day, in-person meeting that occurs in spring to provide all 21<sup>st</sup> CCLC subgrantees information concerning year closeout, reporting requirements, and collaboration opportunities.
  - **21<sup>st</sup> CCLC Monthly Director Meet-ups:** One-hour virtual zoom meetings, that occur the first week of each month, to provide all 21<sup>st</sup> CCLC subgrantees technical assistance, resources and networking opportunities.

#### Staff Professional Development (ESSA, Sec. 8101(42))

Subgrantees are required to offer all staff, at a minimum, two professional development opportunities to increase staff knowledge and skills necessary to enable students to succeed in a well-rounded education and to meet the challenging State academic standards.

- Professional development opportunities should be sustained (not stand-alone, 1-day or short-term workshops), intensive, job-embedded, collaborative, data-driven, and student-focused.

#### National and Statewide Conferences

Subgrantees may use 21<sup>st</sup> CCLC grant funds to attend statewide conferences and trainings that support the goals and objectives of the 21<sup>st</sup> CCLC program. The IDE recommends that individuals that attend statewide opportunities share information with their local program via meeting, training, and collaboration.

#### Program Amendments

The following situations involving significant program changes require prior approval from the IDE:



- Expanding services to include additional grade(s) and/or center(s) that will be supported, in full or in part, with 21st CCLC grant funds. Additional centers not supported by 21st CCLC funding do not require prior approval.
- Subgrantees interested in dropping a center that is in full or part supported by 21st CCLC must obtain prior approval from the IDE.
- Any changes in student populations, whether grade levels or site locations, must obtain prior approval from the IDE.

## COLLABORATION AND PARTNERSHIPS

*Programs establish and maintain strong, working partnerships with schools, families and community stakeholders.*

### School Engagement

#### School Day Staff Communication

- Subgrantees must establish and document regular communication with school day staff such as building principals, classroom teachers, food services, janitorial staff, and transportation.
- Communication should be focused around continuous improvement and more effectively addressing the needs of program participants.

#### School Day Activity Alignment

- Activities must be targeted to the students' academic needs and aligned with the instruction students receive during the school day (**ESSA, Sec. 4201(A)**).
- Subgrantees must align program activities with [Idaho Content Standards](#) to meet the State and local academic standards.
- Program goals and content should align with School Improvement Plans.

#### Private School Consultation

- All subgrantees must conduct timely and meaningful consultation with private schools in the school's catchment area on the provision of "equitable services." (**ESSA, Sec. 4204(b)(2)(N)**).
- All non-LEA subgrantees may collaborate with the school district(s) during their private school consultation.

- All subgrantees must provide documentation to the IDE annually for every private school's intent to participate.
- The IDE will provide each subgrantee with the information of private schools in their catchment area on the provision of "equitable services".

## Family Engagement

The purpose of family engagement & parental involvement is to provide opportunities for active and meaningful engagement in their children's education, and provide opportunities for literacy and related educational development.

Subgrantees must offer no less than:

- **School Year:** Three (3) family literacy services and three (3) parent involvement opportunities.

Family Engagement may be satisfied by two (2) types:

- **Family Literacy Services (ESSA, Sec. 8101(24))** – Services provided to families that are of sufficient intensity in terms of hours, and of sufficient duration, to make sustainable changes in a family, and that integrate the following activities:
  - Interactive literacy activities between parents and their children;
  - Training for parents regarding how to be the primary teacher for their children and full partners in the education of their children; and
  - Parent/Guardian literacy training that leads to economic self-sufficiency.
- **Parental Involvement Opportunities (ESSA, Sec. 8101(39))** – Participation of parents in regular, two-way and meaningful communication involving student academic learning and other school activities, including ensuring:
  - That parents play an integral role in assisting their child's learning;
  - That parents are encouraged to be actively involved in their child's education in school and afterschool; and
  - That parents are full partners in their child's education and are included, as appropriate, in decision making and on advisory committees to assist in the education of their child.

## Partnerships and Community Engagement

### Memoranda of Understanding (MOU)

All subgrantees must have contracts or MOU's in place with all current partners. These contracts or MOU's must be updated at least annually.

### Home School/Community Communication Outreach

- All subgrantees must have a process in place to inform their community that homeschool students living within the boundary of their target school are eligible to participate in their program.
- All subgrantees must actively build relationships with community organizations to build program awareness and support.

## Subgrantee Appeals

### Appeals Process

All subgrantees have the right to appeal the following decisions made by the 21<sup>st</sup> CCLC IDE team:

- Denial of reimbursement requests for unallowable purchases
- Risk assessment or monitoring findings
- Denial of program amendments to the original grant application
- Reduction of funding due to not meeting federal or statewide objectives
- Termination of grant award due to not meeting federal or statewide objectives

### Appeals Timeline

- Subgrantees must submit a formal letter to the 21<sup>st</sup> CCLC Program Coordinator from their district/organization's authorized signer documenting the decision they wish to appeal.
- The IDE will confirm the receipt of appeal within ten business days.
- The IDE will review the appeal and may request additional documentation from the subgrantee for further investigation.
- The IDE will respond with a final decision within 30 days of initial submission.
- If the subgrantee does not agree with the final decision, they have the right to submit an additional appeal to the Director of Student Engagement and School Choice or Executive Team for further review.