



The coronavirus disease (COVID-19) global pandemic is significantly impacting communities, schools, families and workplaces. During this incredibly challenging time, we would like to thank you for your continued patience as we navigate through this uncharted territory. We encourage you to stay safe, remain abreast of information provided by the Oklahoma State Department of Education (OSDE) and other reputable sources.

Below are frequently asked questions we have received regarding the Title IV, Part B – Nita M. Lowey 21st Century Community Learning Center (CCLC) program. Please note that we will continue to update our FAQ’s as more information is made available from the United States Department of Education (USDE). For official information from the Oklahoma State Department of Education, please visit the OSDE website designated to COVID-19 resources [here](#).

UNDERSTANDING SUMMER SERVICES AND DATA COLLECTION

The State Board’s order for the closure of school buildings for the remainder of the year is in effect until the end of the academic year. The Board required schools to continue distance learning for students until at least May 8. Some districts, however, have chosen to continue distance learning until May 15 or even later. Districts should continue implementing their distance learning plans, with buildings remaining closed for students and nonessential personnel through the date the district has chosen for the end of its academic year.

The Governor has released the [Open Up and Recover Safely \(OURS\) Plan](#) detailing allowable activities in three phases as the state begins to relax the directives of his previous executive orders regarding the COVID-19 pandemic. In Phase 1, which began May 1 and continues until at least May 15, the Plan reads:

“Schools and organized sporting events and camps that are currently closed should remain closed until further notice.”

Additionally, in Phase 2 (scheduled to begin Friday, May 15, 2020) ***the following guidelines continue:***

- Maintaining safer-at-home guidelines for those over 65 or who are part of a vulnerable population;
- Maximizing social distancing from others when in public; and
- Refraining from socializing in groups where social distancing is not possible.

These guidelines and requirements are also consistent with the language in the Governor’s most recent executive order, where it is provided that unless otherwise specified in the OURS Plan, individuals should follow U.S. Centers for Disease Control



(CDC) guidelines for social distancing by avoiding crowded places, not gathering in groups and staying at least 6 feet from other people. See [Executive Order, Section 24](#).

The Governor has stated that the state may begin Phase 2 only after hospital and incident rates remain at a manageable level for 14 days. Once in Phase 2, *so long as exercised consistent with proper social distancing sanitation and applicable guidelines*, organized sports activities may reopen and operate beginning in Phase 2. This **does not** relate to guidelines or activities over which private organizations have jurisdiction, including but not limited to the Oklahoma Secondary Sports Activities Association (OSSAA).

NEW: [Where can I find current guidance on gatherings and access to school facilities as we plan for summer 21CCLC programming?](#)

Consultation with your district/organization leadership will be necessary to determine allowable program delivery options for both summer and fall program services. In addition, it's imperative that all program leaders review the [Oklahoma State Department of Education May 18th, COVID-19 FAQs](#) for guidance related to building access and summer programming. The sections within that document entitled "Building Access and Summer School" and "Workplace/Campus" will provide critical guidance that all programs must consider.

NEW: [Where would I go for further information on best practices for collecting the federally required data during distance or blended services?](#)

The [Data Collection FAQ](#) is now available on the 21CCLC website. The document provides an overview of three main areas to carefully consider when reporting program service data.

UNDERSTANDING THE MANDATORY CLOSURE OF SCHOOL BUILDINGS FOR THE 2019-20 SCHOOL YEAR

On March 25, the State Board of Education [amended its first order](#) to direct all accredited public schools to suspend all in-person and extracurricular activities and close buildings for the remainder of the school year.

While school buildings will remain closed for the remainder of the year for general student and personnel attendance, exceptions include: staff providing nutrition services, facilitating or supporting required delivery of distance learning and essential core services. Essential core services include governance, human resources, billing, maintenance and continuity of building functions, staff to maintain building access control and security measures, and student enrollment.



Between March 25 and April 5, districts are directed to provide OSDE with a request for waiver and a set of assurances for the remainder of the school year. The Board's order directs districts to begin distance learning upon approval. However, preparations including convening staff development, consistent with the intent and purposes of the Board's order, may begin immediately.

[Are 21st CCLC program services included in the above State Board of Education order?](#)

Yes, Title IV, Part B - 21st CCLC program services are included in the above State Board of Education order. Programs will be able to continue to provide meaningful learning experiences that complement the school site's distance learning plan and seek to maintain relationships between the program, school, students and families during this period of school building closures. These services must be offered in accordance with the March 25, State Board of Education order.

FREQUENTLY ASKED QUESTIONS

[Can grant funds be used during COVID-19 related school and program closures to support activities that are outside of our program's currently approved grant scope of work or currently approved budget \(i.e., virtual services, staff training, etc.\)?](#)

Additional or new activities **may** be considered during school and program COVID-19 related closures. However, such activities will require preapproval by the OSDE 21st CCLC program office to ensure that the purpose and beneficiaries of the proposed activities meet the intended purpose of these grant funds.

In order to expedite the approval process for these requests, we will be providing a form to allow you to briefly describe your request and any budget implications. Further information and specific instructions on this process and budget amendments in the Grants Management System (GMS) have been sent to each grantee.

[If programs are closed due to COVID-19, can staff continue to be paid? If so, under what conditions?](#)

We understand and share your concern about the financial burden for program staff during this time. We encourage you to explore allowable options for team members to continue to work for the benefit of the program and its beneficiaries. We have reached out to the USDE for additional guidance, so more information may be available soon.

Please be aware that local education agencies or organizations should have board approved leave policies (family medical leave, military leave, school closure, etc.) and policies on the payment of staff under these circumstances in place. We recommend



revisiting these policies at this time for restrictions or needed amendments to reflect public health related closures, such as COVID-19.

At this time, all 21st CCLC work must be completed remotely or virtually. Under no circumstances should staff be compelled to gather for planning or training purposes. Governor Stitt's Executive order 2020-08 and the Center for Disease Control (CDC) recommendation is no gatherings of more than 10 people.

All work must be specific to 21st CCLC programming. Potential activities that may be considered for payment using these grant funds include:

- School collaboration efforts (such as resource building, evidence-based math and reading support)
- Fiscal Year 2021 21st CCLC annual report preparation
- Virtual staff meetings (for example, Zoom, Skype, or conference calls)
- Student and parent education and social-emotional well-being support
- Family education and engagement opportunities (Including community supports, such as information about how and where meals are being provided, how families can support their children during the period of ordered school building closures, etc.)
- Curriculum work (must be specific to the 21st CCLC program)
- Lesson planning (must be specific to the 21st CCLC program)
- 21st CCLC program specific data entry
- On-line professional development for staff
- Systems planning work (for example, summer programs, evaluation planning sustainability planning, safety, budgeting)
- Other expectations or associated job tasks listed in job descriptions that are reasonable and necessary during the closure period
- Gathering virtual off-site student materials and information to support families
- Administrative costs associated with programs (for example, processing claims, budget adjustments, payroll and budget operations)

What items should grantees consider when implementing any of the above activities?

Grantees should consider the following:

- Maintaining 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
- Continuing to meet federal supplement, not supplant requirements
- Proceeding with program and budget revisions as necessary



Are the time and effort documentation requirements for these federal funds any different while programs are operating under a distance model?

All employees paid with federal funds are required to document work performed, whether involving in-person or distance-based services. Additional information to assist grantees with time and effort documentation during this time can be found within the [Oklahoma State Department of Education's Coronavirus/COVID-19 FAQs for Oklahoma Public Schools](#).

We are planning a variety of distance learning options for our 21st CCLC students, including virtual learning and sending supplies home. What should we consider as we develop our plan?

During this incredibly challenging time for families, we would encourage you to consider the following guiding questions in your planning:

- Will this offering or activity help build or strengthen our relationship with the student and their family?
- Will this offering or activity build the skills of family members to support the student's learning experience?
- Is the offering or activity aligned with the school day distance learning plans established by the school day teacher?
- Are the health and safety of the students and staff in the implementation of this plan, offering or activity following current CDC and state-level recommended guidelines for COVID-19?
- When considering sending materials home, how will the safety of the staff, students and families be ensured to limit exposure to COVID-19? Is there another way to offer the learning experience without the need for special materials or equipment?

With the focus on distance learning, what do we need to consider when purchasing technology or using devices previously purchased with grant funds?

A. **Prior to purchasing, utilizing or loaning 21CCLC program devices during this time, you will want to consider:**

1. **Supplemental Requirements** - purchases and activities should support, not overlap or replace, other funding;
2. **ESEA Purpose** - grant expenditures must be afterschool-specific;
3. **Current ESEA Waiver** - Title IV, Part B - 21st CCLC funding was not included within the temporary relaxation of restrictions for using federal funds to purchase technology;
4. **Flexibilities Related to COVID-19** - devices may be temporarily loaned to support school day, distance learning under certain conditions (see below); and



5. **Limits** - technology related to infrastructure remains a non-allowable expense under the grant.

B. Guidelines for loaning program devices to support school-day, distance learning:

At this time, existing devices that were previously purchased with 21st CCLC funds and are not in use by the program, may be used to support school-day distance learning until the end of the school year. Equipment must be labeled and inventoried, and a plan for inventory control must be in place prior to allowing equipment to be used in this way. We recommend, when possible, program devices be assigned to students currently participating in your 21st CCLC program to allow for use of those items during distance learning within both school-day and 21st CCLC program offerings.

C. Guidelines for new device purchases:

1. We have not received any guidance from USDE that would give our grantees permission to buy devices for school-day distance learning; and
2. If your original grant application and approved annual budget contained specific program expenses or shared expenses between the school and program related to technology and you have not yet made those purchases for the year, you may proceed with those purchases as scheduled.

[As we implement distance services within our programs, can we amend our budgets to adjust our staffing needs and allow for more technology tools \(devices, online resources, tech programs, etc.\)?](#)

Our office has created a simple form to allow grantees to inform the OSDE of changes to programming through distance means and to provide justification for a proposed budget adjustment, if needed. The 21st CCLC Distance Learning Plan form was emailed to all Program Directors and can also be accessed online at sde.ok.gov/21cclc, along with instructions for completing and submitting the form within a budget amendment request in the Grants Management System.

[We have a contract with an enrichment provider. Now that we are moving to a distance learning model, are we able to continue to pay the contractor?](#)

As a part of your transition to a distance learning model, we recommend reviewing the scope, pay structure and deliverables of all contracts for necessary modifications, amendments, or cancellation. Vendors cannot be paid for work/deliverables not received.



Can postage to support distance offerings be claimed under these funds?

As programs develop distance offerings, it may become necessary for instructional materials to be mailed home for students. In addition, programs may be exploring pen pals and book club opportunities that would allow students to mail letters and feedback as part of their program participation. These mailing and postage expenses, to include stamps and envelopes for students, would be allowable as long as expenses remain reasonable to support learning. On claims, postage expenses for mailing instructional materials to students or providing stamps for students for use within activities should be coded to 1000-530, while the cost of normal program postage for non-instruction or administrative purposes would remain coded at 2620-530.

Can professional development occurring in the summer be approved?

We would strongly recommend waiting to register or schedule in-person professional development opportunities for the summer until the CDC guidelines for safe practices are updated.

Given current travel restrictions, how can program staff and leaders ensure that professional development requirements for these grant funds are being met?

We understand that many of you made plans during March and April to fulfill the professional development requirement involving annual attendance for program leaders at a national or regional, afterschool-specific conference. With conferences cancelled and travel likely restricted to some extent for the remainder of the fiscal year, participation in the You for Youth's (Y4Y's) online training offerings would be an acceptable alternative for fulfilling this requirement.

Y4Y.edu.gov is a site of support and training materials specifically for 21st CCLC programs. A list of webinars purposely designed to assist programs during building closures can be explored at y4y.ed.gov/webinars. Once a free login account is established, participants will be able to register for webinars and complete and track participation in trainings which will then allow you to have documentation of fulfillment of the professional development requirements under the grant. Other Y4Y modules are available for director and staff-level training, and we encourage you to take advantage of this time to promote online training for your teams as a whole.

How will school and program closures impact the 21st CCLC allocations to states and grant awards to subgrantees?

At this time the USDE has not changed the state allocation, nor has OSDE made any new decisions regarding current or future award amounts or carryover.



How will school and program closures impact the federal and state reporting requirements for the 21st CCLC grant?

As of now, the USDE has not waived federal reporting requirements for 21st CCLC grantees. All grantees should be prepared to submit the final version of each site's 2019-20 Data Management Spreadsheet with the addition of Spring 2020 information at the end of the term. We understand that your data file submissions will be missing state assessment scores and current attendance and participation tracking may look different, due to the implementation of distance services.

In addition to federal reporting requirements, 21st CCLC grantees are required to submit a state-level, end-of-year annual report. Beginning this year, the annual report will be completed and submitted within the Grants Management System. Please anticipate further instructions regarding the annual reporting process.

As program services continue through distance learning, are 21st CCLC grantees exempt from meeting days of operation and attendance requirements for the school year? How should attendance and participation be collected?

Programs will be able to continue to provide meaningful learning experiences that complement the school site's distance learning plan and seek to maintain relationships between the program, school, students and families during this period of school building closures. The means of delivery for these offerings will look very different in each community, as will the available data points for participation.

We ask that grantees make a consistent effort to record reasonable and available data to indicate participation in their distance offerings. This could be a count of materials sent home with meals, students logging in to virtual sessions or a number of other indicators that may be specific to your program's unique method of service delivery.

What is the expectation regarding survey completion?

At this time, the OSDE has determined that the survey collection process should stop for this year. The online links to surveys will be closed. For those grantees who have already collected family and staff surveys, your survey data will be provided back to your site teams for use within the program quality improvement process over the coming year. For those programs who have not yet collected survey data, be assured that our quality process will continue for your sites. The OSDE/21st CCLC team will be working with our partners at The David P. Weikart Center for Youth Program Quality to explore other data sources that can be more fully leveraged to support program improvement efforts in the coming year.



[Will the federally required monitoring process for Oklahoma 21st CCLC programs continue during school building closures?](#)

The OSDE will not be initiating the monitoring process with any additional grantees during the remainder of this fiscal year. The monitoring process is based on a risk assessment of program strengths and challenges, so our focus during this time will be to provide additional supports for grantees already involved in the monitoring process. For programs currently engaged in the monitoring process, please know that our team is working remotely through the Grants Management System, where you can continue to upload documents regarding monitoring for review. Our office will be connecting through virtual means to collaborate about monitoring plans and needed supports.

With the cancellation of the in-person 21st CCLC spring training events, are there other options that would allow me to provide my staff with professional development opportunities during this time?

Several virtual training opportunities are already available to Oklahoma 21st CCLC grantees (i.e., Youth Work Methods, You for Youth). A list of afterschool specific virtual training opportunities will be forthcoming from our office. As a reminder, grantees may pay 21st CCLC staff for the time they spend participating in these virtual sessions, even if schools and programs are not in session.

[Have decisions regarding the 2020-2021 grant competition timeline been made?](#)

Our annual, competitive, grant competition was previously scheduled to begin at this time. We recognize the Covid-19 crisis has required district and organization personnel to focus on more pressing priorities and has limited the ability of potential applicants to meet with advisory members and stakeholders to plan and prepare the grant application. After consultation with the USDE program office and in consideration of these factors, our state has created a delayed timeline for the next 21st CCLC grant competition.

The expected timeline will be:

1. Fall 2020 - open grant application;
2. Spring 2021 - conduct peer review of submitted applications;
3. July 1, 2021 - announce awards and complete allocations.

[As a fifth-year grantee, are there any special exceptions that could be considered to allow for another year of services?](#)

Under ESEA, a State educational agency may renew a subgrant provided under this part to an eligible entity, **based on the eligible entity's performance during the**



preceding grant period. Due to a historically large volume of applications and in an effort to ensure geographic distribution of funds, Oklahoma has not typically authorized this non-competitive renewability option available under ESEA. In response to the COVID-19 pandemic, Oklahoma will elect to provide eligible grantees in year 5, the option to renew their grant funds for a period of one year. Per this statute, in order to implement this flexibility, OSDE must review performance of each fifth-year grantee to determine eligibility for this one-year, one-time option for renewability due to the Covid-19 crisis. If eligible, funding for this one additional year of services, would be provided at the base amount allocated in year 5 of the award, along with available carryover funds.

[Will the carryover limits and procedures outlined in the state guidance be adjusted for this fiscal year due the temporary closure of school buildings?](#)

Yes. Due to the COVID-19 pandemic, the OSDE will opt to allow Title IV, Part B – 21st CCLC grantees to carry all available funds over for a period of one year. It is anticipated that base allocations will be awarded to grantees within the Grants Management System in July, based on the availability of funds from the USDE. Carryover funds will then be allocated following closeout of the current fiscal year.

Any funds in excess of 15% of the current year's base allocation will require a detailed budget justification for approval. This budget justification will be completed during the annual reporting process for the grant to ensure program performance is reviewed.

All carryover must be expended during the 2020-2021 grant year. Grantees in the fifth year of the grant cycle that elect to and are approved for an additional year of funding due to the COVID-19 pandemic will also be allowed to carryover all unused funding under the same conditions.

The grantee final budget will be negotiated at the time of both the base and carryover allocations to ensure all costs are reasonable, necessary, and allocable and can be documented.

[Where will I find the Annual Report and what will need to be included in my budget justification?](#)

The Title IV, Part B – 21st CCLC Annual Report has been incorporated into the Grants Management System (GMS) and will be due for completion by June 1. As in years past, this process provides a review of program performance data for each grantee. Possible results of this review include full refunding of the program, partial refunding with conditions, probationary status and implementation of a performance plan, and /or discontinuation of funding.

For this one-year option of full carryover due to the COVID-19 pandemic, a section has been added to the Annual Report in the GMS for grantees to provide a narrative budget



justification for the use of any funds in excess of the typical 15% carryover. This narrative should provide a clear picture of the program plans for the coming year and how the additional resources will be allocated to support the program goals as provided in the original grant application.

➤ HOW CAN WE SUPPORT YOU?

The Oklahoma State Department of Education 21st CCLC team is here to help! Like many of you, our staff are working from home to remain safe. As a result, there will be a slight delay returning any voicemails left on our phones. We are able to respond quickly to email or if you would like to have face-to-face contact, we can quickly and easily schedule a Zoom call.

Additionally, we would like to remind you that we have lots of ways for you and your team to remain connected – join our Oklahoma 21st CCLC Facebook group, follow us on Twitter, participate in the new listserv conversation, watch for our monthly newsletter or visit our [SDE -21CCLC webpage](#) for updates.

Questions?

For questions regarding the program administration, contact [Sonia Johnson](#), Executive Director Family and Community Engagement/21st CCLC.

For questions regarding claims or budgets, contact [Tracie Raibourn](#), 21st CCLC Fiscal Coordinator.

For questions regarding staff training or data reporting, contact [Katy Smith](#) or [Shante Fenner](#), Grant Specialist.

For all other questions or to reach any staff member, contact [Hannah Smith](#), 21st CCLC and Family Engagement Coordinator.