



DISTRICT OF COLUMBIA

OFFICE OF THE STATE SUPERINTENDENT OF

**EDUCATION**

## **Guidance Related to Coronavirus (COVID-19):**

### **Title IV, Part B**

#### **Nita M. Lowey 21<sup>st</sup> Century Community Learning Centers**

#### **Frequently Asked Questions**

**(Updated November 20, 2020)**

##### **Background**

As a part of the District of Columbia's response to coronavirus (COVID-19), the Office of the State Superintendent of Education (OSSE) is offering this policy document regarding the operation of Nita M. Lowey 21<sup>st</sup> Century Community Learning Centers (21<sup>st</sup> CCLC). This guidance is not intended to supersede any local or federal regulations.

##### **Scope**

This document contains guidance specifically related to the functioning and operation of 21<sup>st</sup> CCLC. This document generally constitutes informal guidance and does not impose any additional requirements beyond those included in applicable federal regulations.

##### **Effective Date**

This guidance was issued on May 8, 2020 and will remain in effect until further notice. This guidance supersedes the previous guidance issued on this subject.

##### **Policy Guidance**

21<sup>st</sup> CCLC are intended to provide out-of-school time activities to reinforce and complement the regular academic programs of the schools attended by the students served. OSSE acknowledges that 21<sup>st</sup> CCLC programs are operating in a rapidly changing environment under unprecedented circumstances. The following guidance is intended to provide clarity on questions and concerns OSSE has received regarding the 21<sup>st</sup> CCLC program, during and beyond the COVID-19 public health emergency.

##### **Frequently Asked Questions**

###### **Q1: Can 21<sup>st</sup> CCLC programming occur during the distance learning period?**

A: 21<sup>st</sup> CCLC grantees may implement distance enrichment programs, where possible, and also use this time to prepare and plan for future programming during this academic year, this summer, and the 2020-21 school year, if appropriate.

Distance enrichment programs to target students' academic needs may be offered online, by telephone, or through home delivery of program materials. To the extent possible, distance enrichment programming should align with the distance learning plans of the schools your students attend. Programs must also abide by the [Family Education Rights and Privacy Act](#) (FERPA) when delivering virtual services.

**Q2: May 21<sup>st</sup> CCLC programs continue to pay program staff during the distance learning period?**

A: 21<sup>st</sup> CCLC program staff may continue to be paid with 21<sup>st</sup> CCLC grant funds for work aligned to their approved program goals, including remote work. Examples of allowable 21<sup>st</sup> CCLC activities during distance learning related to COVID-19 include but are not limited to:

*Academic Planning + Delivery*

- Curriculum development or modifications
- Distance learning planning
- Lesson plan development or modifications

*Human Capital*

- Professional development for staff
- Staff duties and responsibilities assigned to ensure program continuity
- Staff support to meal distribution sites

*Program Management*

- Activities to meet state and/or federal reporting requirements
- Program amendments
- Fiscal year 2021 program planning
- Program data entry and/or validation
- Virtual staff meetings

OSSE is committed to being flexible and accommodating where possible to support revised approaches to programming aligned to grantees' approved program goals.

**Q3: May 21<sup>st</sup> CCLC programs operate during the school day?**

A: On Sept. 18, 2020, the US Department of Education (USED) issued [guidance](#) regarding changes to programmatic allowability (i.e., what is allowed during the school day vs. non-school hours or when school is not in session). In recognition that many local educational agencies are providing distance learning instruction, USED is providing flexibility for 21<sup>st</sup> CCLC programs for the 2020-21 school year. In accordance with that guidance, 21<sup>st</sup> CCLC programs may provide supplemental activities when school is in session (i.e., during the school day). USED recognizes that students may benefit from dedicated personnel and enhanced technological resources to help them better engage with distance learning lessons, independent work that is assigned, and other academic enrichment activities during the portions of the week when school is in session remotely. An exception to this flexibility is that 21<sup>st</sup> CCLC programming activities cannot be provided during in-person instruction, e.g., when LEAs are providing a hybrid approach in which students are in school for part of the week and participating in distance learning during other times of the week. All other requirements for a 21<sup>st</sup> CCLC program continue to apply.

**Q4: Are there restrictions on the virtual platforms that 21<sup>st</sup> CCLC programs can use to provide distance learning?**

A: 21<sup>st</sup> CCLC grantees may use virtual platform(s) that best meets their students' needs. In selecting tools to deliver services, grantees must ensure the privacy and security of student data, while abiding by the [Family Education Rights and Privacy Act](#) (FERPA).

**Q5: Are 21<sup>st</sup> CCLC grantees permitted to distribute equipment and supplies to program participants for use during remote programming?**

A: 21<sup>st</sup> CCLC grantees may distribute 21<sup>st</sup> CCLC-funded equipment and supplies to program participants for use during 21<sup>st</sup> CCLC remote activities. Further, according to recent US Department of Education guidance, grantees may repurpose 21<sup>st</sup> CCLC funded equipment and supplies to meet the general education needs of students, including students with disabilities and English learners, and the instructional needs of teachers, related services providers, and other educational personnel during the national emergency caused by COVID-19.

Grantees must maintain appropriate controls over any equipment and supplies distributed for remote programming, whether for 21<sup>st</sup> CCLC activities or not. Any equipment or non-consumable supplies that are lost or damaged during remote programming must be replaced with non-federal funds. When repurposing equipment and supplies, grantees must abide by requirements related to records management, tracking and labeling found in the United States Department of Education [Fact Sheet](#) for Repurposing Federal Equipment and Supplies to Combat COVID-19 in order to facilitate proper return and continued benefit to the 21<sup>st</sup> CCLC program.

**Q6: How should 21<sup>st</sup> CCLC grantees document programmatic changes related to COVID-19?**

A: 21<sup>st</sup> CCLC programs should document programmatic changes by updating their budgets in the Enterprise Grants Management system (EGMS) and submitting a written narrative of program modifications to [21stcclc.info@dc.gov](mailto:21stcclc.info@dc.gov). These updates may be submitted as often as necessary to align with the programmatic and budgetary changes of the program. For questions or additional support, please contact your grants manager at [Myles.Cliff@dc.gov](mailto:Myles.Cliff@dc.gov) or (202) 531-2792.

**Q7: May 21<sup>st</sup> CCLC programs continue to pay fixed property costs, such as rent and utilities, during remote operations?**

A: 21<sup>st</sup> CCLC programs may continue to pay fixed property costs while program grant activities are cancelled, in whole or in part, due to COVID-19, if consistent with their approved budget and 21<sup>st</sup> CCLC's supplement, not supplant requirement. In such cases, this space must not be used to carry out other activities not directly related to the 21<sup>st</sup> CCLC grant.

**Q8: Will grantees with summer programming be permitted to operate?**

A: 21<sup>st</sup> CCLC grantees with approved summer programming may continue to implement distance enrichment programs, where possible. If the District's stay-at-home order has been lifted, programs may offer onsite programming, in accordance with applicable health and safety guidelines. 21<sup>st</sup> CCLC grantees should work with their respective programming sites to ensure availability of space and relevant resources.

**Q9: Will grantees be required to meet grant requirements related to program metrics, participation and program hours of operation?**

A: OSSE will make reasonable and fair accommodations if grantees are unable to meet program goals and requirements due to the COVID-19 public health emergency. To date, the US Department of Education has not waived federal reporting requirements related to 21<sup>st</sup> CCLC annual performance reporting (APR). Grantees should continue to work with their external evaluators to evaluate their program's effectiveness.

**Q10: Will additional 21<sup>st</sup> CCLC funds be made available to support additional costs such as extended hours, equipment or materials?**

A: At this point, OSSE does not have access to or plans to provide additional 2020-21 school year funds for 21<sup>st</sup> CCLC grantees.

**Q11: What data and documentation should grantees collect during the distance learning period?**

A: Programs are encouraged to maintain a record of activities implemented during the District's modified operating schedule due to COVID-19. Documentation should include daily records for individual staff, including hours worked and all duties performed, programs offered and student attendance, if applicable. For the purposes of program reporting, OSSE will take into consideration the impacts of COVID-19 on programs' relevant goals and objectives.

**Q12: Will OSSE process reimbursements during the distance learning period?**

A: To the extent possible, OSSE will continue to process reimbursements in accordance with the District of Columbia Quick Payment Act. At OSSE's discretion, additional documentation may be requested to support any program offerings or work performed during the District's modified operating status due to COVID-19.

Federal supplement, not supplant provisions continue to apply to all expenditures (i.e., 21<sup>st</sup> CCLC funds may only be used to supplement existing federal, state, and local sources of funds, and should not be used to supplant/replace them.)

**Q13: Will grantees be able to carry over funds to the next fiscal year?**

A: Grantees may carryover whatever remains on the federal portion of their award. The total remaining balance on your award can be viewed in the "payments" section in EGMS and a breakdown of how much of your award is funded federally and locally is available on your Grant Award Notice (GAN). For assistance in determining the amount of award that can be carried over, please contact Myles Cliff at [Myles.Cliff@dc.gov](mailto:Myles.Cliff@dc.gov) or (202) 531-2792.

**Questions**

If you have questions related to this guidance, please contact Tanisha L. Brown, Ed.D., manager, Education Policy and Compliance, at [Tanisha.Brown@dc.gov](mailto:Tanisha.Brown@dc.gov) or (202) 741-4699.

**For resources and information about the District of Columbia Government's coronavirus (COVID-19) response and recovery efforts, please visit [coronavirus.dc.gov](https://coronavirus.dc.gov).**