



DISTRICT OF COLUMBIA

OFFICE OF THE STATE SUPERINTENDENT OF

**EDUCATION**

## **Guidance Related to Coronavirus (COVID-19): Title IV, Part B**

### **Nita M. Lowey 21st Century Community Learning Centers**

### **Frequently Asked Questions**

(Updated September 30, 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 21st Century Community Learning Centers (21st 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 21st 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**

21st CCLC is 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 21st 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 21st CCLC program, during and beyond the COVID-19 public health emergency.

#### **Frequently Asked Questions**

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

A: 21st 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 21st CCLC programs continue to pay program staff during the distance learning period?**

A: 21st CCLC program staff may continue to be paid with 21st CCLC grant funds for work aligned to their approved program goals, including remote work. Examples of allowable 21st 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: Are there restrictions on the virtual platforms that 21st CCLC programs can use to provide distance learning?**

A: 21st 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).

**Q4: Are 21st CCLC subgrantees permitted to distribute equipment and supplies to program participants for use during remote programming?**

A: 21st CCLC subgrantees may distribute 21st CCLC-funded equipment and supplies to program participants for use during 21st CCLC remote activities. Further, according to recent US Department of Education guidance, subgrantees may repurpose 21st 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.

Subgrantees must maintain appropriate controls over any equipment and supplies distributed for remote programming, whether for 21st 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, subgrantees 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 21st CCLC program.

**Q5: How should 21st CCLC grantees document programmatic changes related to COVID-19?**

A: 21st 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.

**Q6 May 21st CCLC programs continue to pay fixed property costs, such as rent and utilities, during remote operations?**

A: 21st 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 21st 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 21st CCLC grant.

**Q7: Will grantees with summer programming be permitted to operate?**

A: 21st 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. 21st CCLC grantees should work with their respective programming sites to ensure availability of space and relevant resources.

**Q8: 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 crisis. To date, the US Department of Education has not waived federal reporting requirements related to 21st CCLC annual performance reporting (APR). Grantees should continue to work with their external evaluators to evaluate their program's effectiveness.

**Q9: Will additional 21st 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 2019-20 school year funds for 21st CCLC grantees.

**Q10: 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.

**Q11: 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., 21st 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.)

**Q12: Will subgrantees be able to request an extension of funds that would normally expire Sept. 30, 2020?**

A: For grants awarded for the 2017-18 school year (FY18) – three-year awards that are slated to end on Sept. 30, 2020 – subgrantees may request a no-cost extension of the federally funded portion of their grant. If granted a no-cost extension, these funds may be combined with other funding sources to operate your out-of-school time program. To request a no-cost extension, please complete [this form](#) and submit it to [OSSE.grants@dc.gov](mailto:OSSE.grants@dc.gov). For assistance in determining the amount of how much of your award that qualifies for a no-cost extension or carryover, please contact Myles Cliff at [Myles.Cliff@dc.gov](mailto:Myles.Cliff@dc.gov) or (202) 531-2792.

Further, for awards issued for the 2018-19 school year (FY19) and 2019-20 school year (FY20), OSSE has waived the 15 percent carryover limitation. This means subgrantees may carryover all remaining federal and local funds for these award years into the 2020-21 school year (FY21).

**Q13: Will OSSE still release the 2020-21 school year 21st CCLC grant in spring 2020?**

A: OSSE released the 2020-21 school year 21st CCLC competition on April 30, 2020 and the competition closed on June 12, 2020. Grant awards were announced in July 2020. For more information, please visit the [OSSE 21st CCLC website](#).

**Questions**

If you have questions related to this guidance, please contact Tanisha L. Brown, Ed.D., Supervisory Education Policy & Compliance Specialist, Office of Special Populations & Programs, 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).**