

# 21st CCLC Common Compliance Issues

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# Agenda

- **Review 21st CCLC definition**
- **Common Non-Compliance Areas**
  - **Programming**
  - **Accessibility**
  - **Communication**
  - **Evaluation**
  - **Student Attendance**
  - **Family Services**
  - **Staffing**
  - **Fiscal**
  - **Record Keeping**



# 21st Community Learning Center

Defined in federal statute as:

*...an entity that (1) assists students to meet challenging State academic standards by providing the students with academic enrichment activities and a broad array of other activities during non school hours or periods when school is not in session that-*

- Reinforce and complement the regular academic programs of the schools attended by the students served*
- Are targeted to students' academic needs and aligned with the instruction students receive during the school day; and*

*(2) offers families of students served by the center opportunities for active and meaningful engagement in their children's education, including opportunities for literacy and related educational development*

# What a Community Learning Center is Not

- A childcare program
- A homework completion program
- An open gym
- A drop-in program



# Compliance

## Compliance:

- Demonstrates/documents alignment to all state and federal grant guidelines
- Differs from *quality*
- Adheres to the competitive application and/or most recently-approved Yearly Progress Report (YPR)
- Review basic requirements of the CLC grant program here: <https://dpi.wi.gov/sspw/clc/training>

# Is Your Program in Compliance?

1. Review your competitive application.
  - a. Get to know the signed assurances.
  - b. Are you doing what was described?
2. Get to know the terms and conditions of the award.
3. Has your program been cited for compliance issues in the past? Are they resolved?

# How Does DPI Determine Compliance?

## Desk

- Review budgets
- Review mid-year data
- Review APR data
- Review YPR submissions

## On-site

- Usually 3rd or 4th year of grant cycle
- Review for compliance and quality
- Issue formal report



# Program Schedule

- **At least 10 hours per week of programming**
  - **Must be at least 10 hours, NOT an average of 10 hours**
- **At least 115 days per school year**
- **At least 45 minutes of before-school programming**
- **Must occur outside of typical day school hours (with the exception of school vacation days)**

# Academic Enrichment

- **Must provide academic enrichment to ALL program participants (including before-school and after-school participants)**
- **All students have regular access to academic enrichment**
- **Homework assistance is NOT academic enrichment**
- **Must provide academic enrichment that aligns to student academic needs AND state academic standards**

# Additional Programming

- **Must provide a broad array of other activities (at least two)**
- **May not use grant funds to supplant existing programming, such as intramural sports**



# Safety

- **Student attendance must be monitored**
- **Entrances/Exits must be properly secured and monitored**
- **Processes in place to document dismissal of students**
- **Staff and students are trained in safety procedures**



# Accessibility

- **Must adhere to applicable state and federal laws to ensure programs are accessible to all**
- **Safe transportation must be made available to eliminate barriers to participation**
- **Printed materials should be inclusive and translated as needed**

# Pop Quiz

The CLC program at Johnson Elementary School serves students in grades K-5. 50% of school's students live within a 2 mile radius of the school, 50% live more than 2 miles from the school, and 5% of the enrolled students are identified as homeless. The CLC program allows students to be picked up, walk home from the program, or access discounted-rate city bus passes.

Is the program's transportation plan in compliance?

# Transportation

- Grantees are required to ensure safe transportation to and from the program
- Transportation cannot be a barrier to participation



# Family Programming

- **Must provide families with opportunities for meaningful involvement in their children's education**
- **Family events must have a purpose beyond entertainment**
- **Recommended minimum of 4 events per school year**
- **Events that are solely funded by the CLC grant are limited to the family members of CLC-enrolled participants**
- **Can coordinate with other funding sources**

# Communication: Promotional Materials



Take a look at this CLC t-shirt design.

Is the shirt's design in compliance?

# Communication: Promotional Materials



**All promotional materials must cite the 21st CCLC grant.**

# Communication: Private Schools

If there is a private school within the CLC's service area, you are required to:

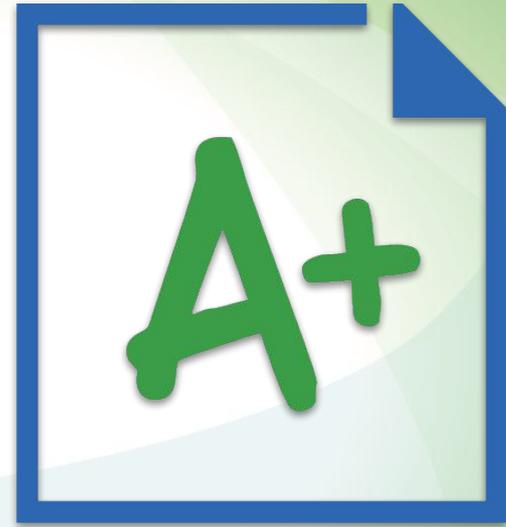
- a. Consult with school administration
- b. Complete the Private School Affirmation form
  - i. Keep a copy for your records
  - ii. Submit the form to DPI if the CLC grantee is a public school or public charter school



# Grant Requirements: Evaluation

Three levels of required evaluation:

- State
- Federal
- Local program level



# Program Evaluation: Statewide System

The minimum data you must enter into the Cayen system this year:

APR data

Dr. Michael Holstead:  
[holsteam@uwgb.edu](mailto:holsteam@uwgb.edu)



# Program Evaluation: Local Plan

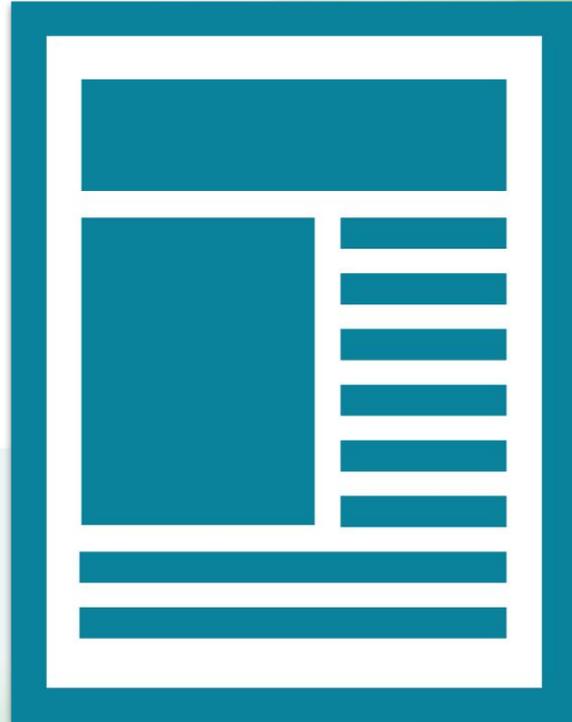
All programs are required to implement all aspects of the evaluation plan outlined in the application, including:

- Performance measures and evaluation procedures
- How results will be used to improve program
- How results will be shared with public

# Evaluation: Local Results

Evaluation results must be made public:

- Website
- School board meeting notes
- Media
- Available upon request



# Self-Assessment: Tools

What are the four approved self-assessment tools?

1. Wisconsin After School Continuous Improvement Process (WASCIP)
2. New York State Network for Youth Success (NYSAN)
3. Youth Program Quality Assessment (YPQA)
4. Quality Assurance System (QAS)

# Self-Assessment: Timeline

Grant Year	Requirement	Due
Year 1	Identify self-assessment tool	With submission of 21st CCLC Yearly Progress Report (YPR)
Year 2	Conduct self-assessment and develop improvement plan	Summary reported with submission of 21st CCLC YPR
Year 3	Implement improvement plan	Summary and results reported with submission of 21st CCLC YPR
Year 4	Continue to implement improvement plan	Summarize plans for continuous improvement in 21st CCLC YPR
Year 5	Continue to revise and implement improvement plan	N/A

# Self-Assessment: Common Questions

- Can we do the self-assessment process in one year or do we have to follow the schedule?
- We changed our minds about what tool to use, is that okay?
- What happens if we don't meet the self-assessment requirement?



# Student Attendance: Funding Tiers

Minimum Average Daily Attendance (ADA)	Funding Tier
25 - 40	\$80,000
41 - 55	\$100,000
56 - 70	\$115,000
71 - 85	\$130,000
86+	\$145,000

# Student Attendance: Compliance Process

- **Non-compliant status #1:**
  - Improvement plan
  - Additional technical assistance (TA)
- **Non-compliant status #2:**
  - Improvement plan
  - DPI captures carryover
  - Additional TA
- **Non-compliant status #3:**
  - Grant award reduced
- Summary document available at <https://bit.ly/2kmyVeQ>



# Student Attendance: ADA

**When to count a student:**

- **Attends the majority of programming each day**
- **Accesses academic enrichment**



# Pop Quiz

Happyville CLC serves an additional school (i.e., “feeder” school). 52% of the CLC’s students come from its primary school site, while 48% of the CLC’s students come from the additional school.

Is Happyville CLC in compliance?



# Student Attendance: Additional Schools

- **Primary school:**
  - School from which program draws majority of participants
  - At least 51% of projected ADA
- **Feeder school(s):**
  - Additional school(s) served by grant
  - Must be served at same site as students from primary school
  - Funds may not be used to operate multiple sites

# Pop Quiz

**Prairie Town Elementary is the new recipient of a CLC grant. The school's academic coach has been chosen to be the CLC coordinator.**

**Under what conditions is this allowable?**



# Pop Quiz

1. This is never allowable
2. It is allowable if the school can document that the academic coach spends at least 20 hours per week on CLC-related activities.
3. It is allowable if the hours that the coordinator is being paid to work for the CLC program are *in addition to* the hours that she was already being paid to work as an academic coach.

# Staffing

- Programs in years 1-4 are required to employ a dedicated coordinator
- Minimum of 20 hours per week if overseeing one program
- Minimum of 40 hours per week if overseeing multiple programs
- DPI discourages employing someone who has another full time job
- Must document time and effort



# Pop Quiz

Sycamore Elementary has offered locally-funded summer programming for its students for the past five years. This year, the school will use CLC funds to expand the program and offer an afternoon session.

Is this allowable?



# Supplement vs. Supplant

- **Supplementing** - Federal funds are used to provide new services or to expand services that were already being provided using other funds
- **Supplanting** - Federal funds are used to replace other funding sources
- Federal funds may **NOT** be used to supplant other funding sources!



# Subcontracting

**Fiscal agent/grantee may subcontract with other entities, with certain conditions:**

- **Must retain at least 5% of award for oversight purposes**
- **Must submit a separate budget for entities receiving more than 25% of award**
- **Must designate a contact person who represents fiscal agent/grantee to receive and respond to communications from DPI**

# Pop Quiz

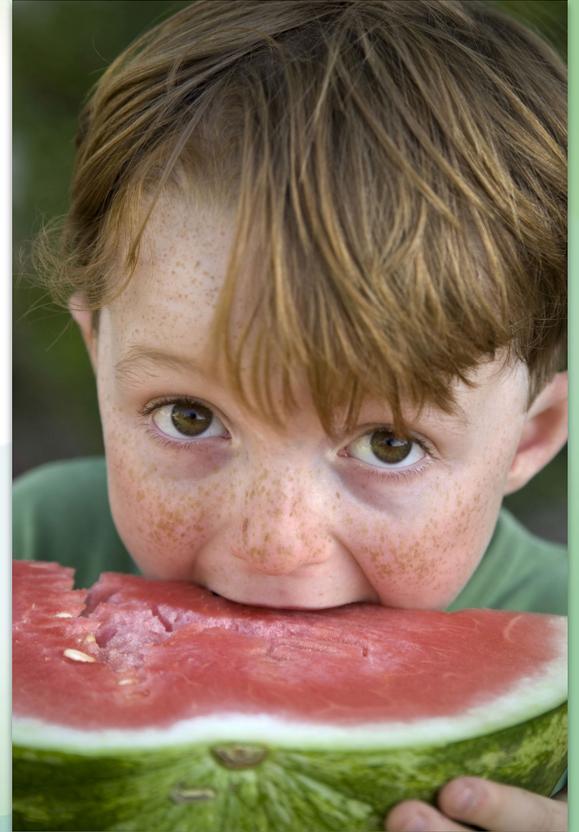
Which of the following is an allowable food-related expense?

1. Purchase of ingredients to make chili for a family event that involves learning how to prepare nutritious and affordable meals
2. Purchase of granola bars for students to eat as a snack after school



# Allowable Costs: Food

- In general, grant funds may not be used to cover food costs
- Resources:
  - [National School Lunch Program- Afterschool Snacks](#)
  - [Summer Food Service Program](#)
  - [Child and Adult Care Food Program](#)



# Pop Quiz

**The Extra Special After-School Program is planning to use CLC funds to pay for an end-of-year trip to Six Flags for all students who have attended the program regularly.**

**Is this allowable?**



# Allowable Costs

In general, costs must be:

- **In alignment with Program Plan/Goals**
- **Reasonable and necessary**
- **Allowable under federal law**



# Costs That Are Generally NOT Allowable

- Capital objects
- Incentives
- Pre-award costs
- School hours



# Program Income

- Includes fees, fundraising, and donations
- Must request permission
- Must be spent within grant period
- Must be spent on CLC-related expenses
- Must be spent on allowable costs
- Must be tracked

# Fees

- **Strongly discouraged**
- **Must be nominal**
- **Cannot be barrier under any circumstance**
- **Must be able to document why fee is necessary to carry-out services**
- **Must be approved by DPI on an annual basis**

# Record Keeping

- Plan for program transition periods
- Maintain records for required amount of time
- Types of information to track:
  - ADA/Enrollment records
  - Data needed for APR reporting
  - Financial records (e.g., timesheets, signed agreements, receipts, etc.)



# Grant Application and Reporting

To familiarize yourself with the 21st CCLC grant requirements, review:

- [Competitive Application](#)
- [Grant Guidelines](#)
- [Yearly Progress Report \(YPR\)](#)
  - Opportunity to propose changes to program plan
- [Monitoring Survey Tool](#)
- All available here: <https://dpi.wi.gov/sspw/clc>

# Dates and Deadlines

- **Mid-year report - January 31, 2020**
- **End-of-year report (YPR) - May 29, 2020**
- **Deadline to submit budget change requests: May 30, 2020**
- **Final claims due: September 30, 2020**
- **Grant obligation period: July 1, 2019 - June 30, 2020**

# Training and Technical Assistance

- Regional Communities of Practice: Youth Development: November, January, and March
- Spring Training: March, 2020
- Archived DPI [webinars](#)
- [Wisconsin Afterschool Network \(WAN\) Trainings](#)
- [You for Youth \(Y4Y\)](#)



# Evaluation



<https://forms.gle/GZBZqNHK74WFEK7a7>

**Due this Friday, September 27**

# Questions



# For More Information



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