COVID-19 Q&A for Nita M. Lowey 21st Century Community Learning Centers
(As of 6/02/2020)

The Wisconsin Department of Public Instruction (DPI) understands that Wisconsin Nita M. Lowey 21st Century Community Learning Centers (21st CCLC) have many questions regarding obligations during the COVID-19 (Coronavirus) closures. This document is intended to provide answers to some of the commonly asked questions regarding program services and operations related to COVID-19. For information on COVID-19 and its impact on K-12 Education and Libraries, please visit the DPI's COVID-19 webpage.

Please contact your 21st CCLC consultant with further inquiries.

General Information

Q1: How will school and program closures impact the 21st CCLC award?

A: At this time the U.S. Department of Education has not changed the state allocation, nor has DPI made any new decisions regarding current or future award amounts or carryover.

Q2: Where can I find more information on supporting out-of-school time programs during closures?

A: DPI has created a webpage for resources related to the impact of COVID-19 school closures. For the most up to date information, go to the Information on COVID-19 webpage. Additional resources that may be helpful can be found via the following:

- The Afterschool Alliance has many after-school-specific resources related to COVID-19 posted on their website: http://afterschoolalliance.org/covid/
- The National Afterschool Association (NAA) has also been sharing information about COVID-19 that is specific to after-school programs on their news page: https://naaweb.org/news
- You for Youth (Y4Y), the technical assistance website for 21st CCLC programs, has two archived webinars that may be helpful to programs:
- National Summer Learning Association
  - https://www.summerlearning.org/resources-for-programs-and-families-during-school-closures/

Q3: How can I stay connected with other 21st CCLC grantees while my program is closed?
A: There are several ways 21st CCLC grantees can communicate with each other during this time. The DPI maintains a list of contacts for all 21st CCLC grant recipients in Wisconsin, which can be found on the Nita M. Lowey 21st Century Community Learning Center Grant Program webpage. The information on this list may be used to contact grantees directly. To ask a question of the group, grantees can send a message to the 21st CCLC listserv or post a question on the 21st CCLC Google+ page, which can be accessed via this link: https://plus.google.com/u/0/communities/116559956298611126258. Additionally, while schools are closed, the DPI is hosting weekly, voluntary, virtual calls for grantees to check-in. Calls are held on Wednesdays at 11:00 AM. A schedule and access information will be shared via the 21st CCLC email.

### Use of Grant Funds

**Q4:** 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 plan (i.e., virtual services, staff training, etc.)?

A: Additional or new activities may be provided to program participants during school and program COVID-19 related closures, but changes to your program plan must be submitted to your DPI consultant (https://dpi.wi.gov/sites/default/files/imce/sspwpdf/2019-20_CCLC_Liaisons.pdf) in advance of approval. Note that all activities must still align with the allowable activities under the grant. Also, determine if a Budget Change Request (https://dpi.wi.gov/sspwpcl/current-grantees) is required in order to implement the proposed changes, and submit the appropriate form to your DPI consultant for approval if necessary.

**Q5:** Can 21st CCLC grant funds be used to operate in-person programming for students, even if schools are closed (i.e., limited-sized childcare services)?

A: If the 21st CCLC grantee has operated in a school district facility, the program should follow the school district policies for any services or closures. If the program generally operates in a community-based organization facility, the program should follow current state and local policies governing in-person gatherings.

**Q6:** Can 21st CCLC grant funds be used to pay unemployment costs?

A: Some of your employees may qualify for unemployment benefits. Please work with your Human Resources Department or legal counsel and refer to state and federal guidelines for unemployment processes.

**Q7:** Where can I find more information on the use of federal funds during closures?
A: Visit DPI’s School Financial Team’s COVID-19 FAQ at https://docs.google.com/document/d/19NREEAPsiJlfaqaVcETmHyykTPKi5jrDJbj9Imesl74/edit

Q8: Can my program make purchases for the 2019-2020 grant year even if the [in-person] program will not operate for the remainder of the grant period?

A: All purchases made with 21st CCLC grant funds are federal property and should be used for 21st CCLC programming. Purchases based on your most recent approved budget may still be made. If you are considering purchasing items to send home with students, contact your 21st CCLC consultant with specific inquiries. It is not allowable to purchase something for next year (2020–2021) using this year’s (2019–2020) funds.

Program Operations

Q9: If programs are closed due to COVID-19, are 21st CCLC grantees exempt from meeting days of operation requirements for the school year?

A: In response to school and program closures due to the COVID-19 pandemic, DPI has amended or waived a number of the state-level requirements for 21st CCLC programs for the 2019-2020 school year. The requirement that programs operate a minimum of 115 days during the 2019-2020 school year is waived.

Q10: If programs are closed due to COVID-19, are 21st CCLC grantees exempt from meeting the average daily attendance (ADA) or regular attendee requirements for the school year?

A: In response to school and program closures due to the COVID-19 pandemic, DPI intends to be as flexible as possible and therefore will determine ADA compliance on a case-by-case basis. DPI will take into consideration the ADA reported at the time of program closure, history of ADA compliance, and any improvement plans that may already be in place. Grantees will be notified if the reported ADA will impact the status of their award.

Programs in year 5 are waived from meeting the required 50 regular attendee benchmark for the 2019-20 school year.

Q11: My program is a licensed child care center under the Wisconsin Department of Children and Families (DCF). Can we continue to provide in-person services for youth?
A: Follow the guidance provided by DCF for all operations. Note that in serving those students from the targeted school under the grant award, 21st CCLC funds should be used to continue operations as approved under the program proposal.

Q12: Can 21st CCLC programs operate virtual or other at-home enrichment programming in an effort to continue to serve students?

A: Yes, grantees may offer alternative enrichment programming in the absence of on-site programming. Note that sites must be able to document time and effort, and that programming must be allowable (find the full list of allowable, grant-funded activities at https://dpi.wi.gov/sites/default/files/imce/sspw/pdf/21st_CCLC_19-20_Guidelines.pdf). Consistent with grant regulations, such programming must operate outside of day-school operations (if the school is offering virtual learning). In particular, if a 21st CCLC program provides services through virtual learning, the site must ensure that all students have equal access to the same opportunities. Visit https://dpi.wi.gov/broadband for information about digital equity.

Q13: Can the program continue to provide snacks and meals to students even if the program activities are no longer being provided?

A: Yes. Visit the DPI School Nutrition Team’s website for information for programs that are part of the Child and Adult Care Program (CACFP).

Q14: Can the program provide snacks and meals to students who were not previously enrolled in the 21st CCLC program?

A: Yes. Programs should refer to the DPI WI Child Nutrition program website. For specific guidance, see tabs located in the center of the webpage.

Q15: Now that the Statewide Safer at Home order has been lifted, am I allowed to resume in-person services?

A: The Wisconsin Supreme Court struck down almost all of the “Safer at Home Order,” Executive Order 28. The Court did not strike down the section of the Safer at Home Order that closed public and private K-12 schools. That section of the Safer at Home Order, as well as the defined terms referenced by that section, remain applicable and enforceable. In further reviewing the Wisconsin Supreme Court decision, please be aware that public and private schools remain closed for pupil instruction and extracurricular activities through June 30. For any activity that is not pupil instruction or an extracurricular activity, schools should consult with their local health departments as to how to engage in that activity safely, or whether to engage in that activity at all. Decisions about when and how to offer in-person activities for students should be made in consultation with the local education agency and following guidance provided by the county health authorities. The DPI and the Department of Health Services (DHS) have published guidance that may
be helpful when determining when and how to best serve students through in-person activities.

- **Minimizing Health Risks**
  *Interim COVID-19 Infection Control and Mitigation Measures for Schools* is meant to support local planning. This guidance was developed by DPI in consultation with DHS and constitutes what is considered promising practice at the current time based upon what is currently known and understood regarding COVID-19. Any decision about the use of the school building for in-person programming should be made in consultation with local health authorities who can help assess the current level of mitigation needed based on the level of COVID-19 transmission in your community, the capacities of your local public health department and health care systems, and other relevant factors. DPI is continuing to work on related and more detailed guidance on reopening schools.

- **Summer Activities**
  DHS released *Interim Guidance on Summer Camps* and *Youth Sports*. Please contact your local health authority if you have questions about either of these documents.

**Employment or Staffing**

**Q16: If programs are closed due to COVID-19, can staff continue to be paid? If so, under what conditions?**

A: In cases where paid leave is not part of the employee’s current employment agreement, 21st CCLC grant funds cannot be used to pay for leave time for those employees. If staff can demonstrate that they are working on 21st CCLC-related activities during the program closure, then payment for their time may be appropriate. Please be aware that local agencies or organizations may have additional restrictions in place regarding payment of staff during school closures. The U.S. Department of Education has made additional guidance available regarding staffing costs that may be helpful when determining how or when to pay staff during the COVID-19 related closures. Visit the [U.S. Department of Education COVID-19 Information and Resources for Schools and School Personnel](https://www.ed.gov/coronavirus) website, and specifically, the Fact Sheet Related to U.S. Department of Education Grant Funds During the Novel Coronavirus Disease 2019.

Potential work that may be considered for payment using grant funds includes:

- Virtual staff meetings
- Curriculum planning
- Lesson planning for the 21st CCLC program
- Data entry
- Online professional development
• Ongoing program management or planning (i.e., evaluation, planning summer activities, etc.)
• Online programming for youth (see Question and Answer below regarding off-site 21st CCLC activities)
• Other job tasks associated with the 21st CCLC program and job description that are considered reasonable and necessary during school closures

Q17: How do we request adjustments to our programming as a result of the closures?

A: Contact your 21st CCLC consultant via email. There will also be an opportunity in the YPR to note any proposed changes for 2020-2021.

Reporting Requirements

Q18: How will school and program closures impact the federal reporting requirements for the 21st CCLC grant?

A: The U.S. Department of Education (ED) has not waived federal reporting requirements for 21st CCLC grantees. However, ED recognizes that grantees are experiencing unprecedented challenges as a result of COVID-19-related school and program closures that may interfere with their ability to report data into the federal data collection system, known as 21APR. For that reason, the deadlines for submitting 2019-2020 APR data have been extended as follows:

• Summer 2019 data will be reported directly into the federal 21APR system beginning on May 26, 2020. This reporting window will close on July 13, 2020, and reopen for those that were unable to report in the initial window on September 15, closing on October 15
• Fall 2019 and Spring 2020 data will not be entered directly into the 21APR system. Instead, grantees must enter this data into DPI’s statewide evaluation system (Cayen). The deadline for entering and certifying Fall 2019 APR data in the Cayen system is November 13, 2020. The deadline for entering Spring 2020 APR data is January 8, 2021 Additional information will be made available on the 21st CCLC APR website.

Please note, grantees should only report on in-person programming that took place before schools and programs closed on or before March 18, 2020 into Cayen.

In addition to extending reporting deadlines, the federal Department of Education has added a narrative section to the grantee profile page in the federal data collection system that is intended to provide grantees with an opportunity to explain how the data they are reporting was impacted by the COVID-19 crisis. To gather information about the impact of COVID-19 on Wisconsin CLC programs, DPI will administer a short, open-ended survey to all grantees and will use the responses to create an impact statement for each grantee. This survey will be sent to the primary CLC contact via email and must be completed by October 1, 2020.
Q19: Will the annual teacher survey requirements be amended or waived in light of the school closures due to COVID-19?

A: Yes, DPI has waived the requirement that programs collect teacher survey data for at least 75% of regular attendees (i.e. students attending 30 or more days) the 2019-20 school year. Grantees should consult with school and district administration when deciding whether or not to pursue the administration of teacher surveys. Please note; the APR Report will still include an Outcomes section. Following the recommendation of the federal Department of Education, DPI is advising grantees who elected to administer teacher surveys to report the results in Cayen's AS21 system. If grantees did not collect teacher survey data, they should leave the Outcomes section blank in Cayen.

Q20: How will school and program closures impact the YPR?

A: The YPR looks different for 2019-2020. Some questions have been eliminated to lessen the reporting burden for the 2019-20 school year and there are multiple opportunities throughout the YPR to indicate whether the data is unavailable due to school closings. The deadline for submission is 4:00 pm, Monday, June 22, 2020.

Q21: Am I required to track and report program activities that took place while schools were closed as a result of the COVID-19 crisis? If so, how do I track a report such activities?

DPI recognizes that many 21st CCLC programs have transitioned to serving their students, families, and communities virtually or remotely during the COVID-19 closures. Sites are not required to report the number of students served by virtual or remote programming that takes place during spring of 2020. If sites choose, they may choose to use the Excel template provided by UWGB-Consortium of Applied Research to record activity-related data that is posted on DPI's 21st CCLC website. Excel tracking templates may also be shared with UWGB-Consortium of Applied Research (email to car@uwgb.edu). However, grantees are not required to share their tracking data.

It is not recommended that grantees enter virtual or remote programming into the Cayen system. If a grantee wishes to use Cayen to track virtual or remote programming, they should contact Michael Holstead at holsteam@uwgb.edu or 920-366-9805 prior to entering such information into the system.

Timelines and Deadlines

Q22: My program is in year five and is pursuing the renewability option. Will there be a delay in announcing which programs have been renewed?
A: The DPI is in the process of notifying grantees under consideration for renewability of their status.

Q23: Is DPI extending the deadline for final budget change requests (due May 30)?

A: Yes. DPI has extended the deadline for 21st CCLC grantees to submit final budget change requests for the 2019-20 school year to no later than June 30, 2020.