

21st Century Community Learning Centers

2020-21 Handbook



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Overview

The 21st Century Community Learning Centers (21C) program has been funding high quality afterschool and summer learning programs since 1998. Poverty, opportunity gaps, and unmet academic need drive the program's purpose. Annually, up to 15,000 youth and 6000 regular attendees are served in 100 high needs communities across Vermont. Programs are expected to complement, but not duplicate the school day. Annual or semi-annual grant competitions are held to support this vision.

This leader handbook is designed to give project directors and others an overview of the 21C program and its systems, procedures, rules, expectations, and standards.

If you have any questions please, contact Vermont's 21C State Coordinator, [Emanuel Betz](#) or (802) 828-6977

Key Areas

Legislation and Legal Framework

The 21C program rules flow from federal legislation as part of the Every Student Succeeds Act (ESSA) Title IV Part B. The US Department of Education (ED) develops rules and guidance for the use of federal funds including 21C funds that provide a general framework for implementation. These rules are known as EDGAR (Education Department General Administrative Regulations) The 21C ED office has also produced 'non-regulatory guidance' that assists states in implementation. The Vermont Agency of Education (AOE) manages the program at the state level, and develops statewide systems of implementation, as well as additional standards, rules, and expectations. Eligible local communities in Vermont apply for funding in order to implement programming. An annual grant agreement is signed that is based on the approval of a 21C application and any grant conditions and amendments. Finally, local school district policies as well as school-based procedures or other local expectations are followed and assist in the successful implementation of the program.

Safety

Programs must adhere to the 21C safety standards. Note that "safety" covers the physical (body), emotional (mind) and environmental (air, water, food, space) realms. Additionally, there are tactical concerns as well, which are specific strategies and related expectations in relation to above, such as emergency preparedness activities. The safety standards are reported on annually within the Annual Performance Report site collection as well as part of the self-assessment checklist used as part of a standard site visit process. In addition to program handbooks, emergency and aquatic plans are collected by AOE and need to be maintained and updated regularly. In addition, a safety folder is maintained and updated on the afterschool wiki with on-going resources posted for this area. If at any point any safety standard is not assured, contact the 21C state coordinator immediately to discuss strategies and needs. [Wiki safety folder](#)

Online [Mandated Reporters](#) training:

All staff who have contact with youth are considered mandated reporters and need to complete the required training.

Bullying and Harassment:

All afterschool staff should be familiar with strategies for preventing and responding to incidents of bullying and harassment. (See Appendix D) All procedures should be consistent with those practiced by sending schools and the requirements of Vermont Rules and Regulations. Of equal importance are for staff to be familiar with their regulatory responsibilities outlined in Vermont’s model bullying and harassment policy. Besides defining both bullying and harassment they outline the responsibilities for staff who observe bullying or harassment including reporting requirements. Schools have designated reporters who can and should be consulted and used. Copies of the policies, which outline the minimum requirements for after school programs (and schools), can be found at [model policies](#).

School-Age/Child Care Regulations:

21C funded programs that run elementary programs are exempt from licensure by state law. However, many choose to become licensed. It is expected generally that 21C funded programs align to or exceed these licensing regulations. One key safety area to monitor alignment if your program is not licensed are the swimming regulations (see page 42): [School Age Care Regulations](#)

New Employee Procedures

All staff must have completed fingerprinting and background checks as well as complying with other local supervisory union or district hiring procedures.

Use of Restraint and Seclusion-Rule 4500

All after school programs need to comply with all parts of Rule 4500.

The purposes of Rule 4500 are:

- a. Create and maintain a positive and safe learning environment in schools;
- b. Promote positive behavioral interventions and supports in schools; and
- c. Ensure that students are not subjected to inappropriate use of restraint or seclusion.

All afterschool staff should have familiarity with the [State Board of Education Rules Series](#) and its requirements and prohibitions.

Confidentiality

The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) is a Federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education. You must follow FERPA requirements in accordance with Federal law.

Confidential information may not be shared with anyone who does not have a “**need to know**.” People who “need to know” certain information may include classroom teachers, counselors, special educators, bus drivers, other school staff, and administrators. Each child is different and therefore who “needs to know” may vary from student to student. Check with leadership if you have any questions or to get approval on sharing information.

FERPA SUMMARY

FERPA gives parents certain rights with respect to their children's education records. These rights transfer to the student when he or she reaches the age of 18 or attends a school beyond the high school level. Students to whom the rights have transferred are "eligible students." Parents or eligible students have the right to inspect and review the student's education records maintained by the school. Schools are not required to provide copies of records unless, for reasons such as great distance, it is impossible for parents or eligible students to review the records. Schools may charge a fee for copies.

Parents or eligible students have the right to request that a school correct records, which they believe to be inaccurate or misleading. If the school decides not to amend the record, the parent or eligible student then has the right to a formal hearing. After the hearing, if the school still decides not to amend the record, the parent or eligible student has the right to place a statement with the record setting forth his or her view about the contested information.

Generally, schools must have written permission from the parent or eligible student in order to release any information from a student's education record. However, FERPA allows schools to disclose those records, without consent, to the following parties or under the following conditions (34 CFR § 99.311):

1. School officials with legitimate educational interest;
2. Other schools to which a student is transferring;
3. Specified officials for audit or evaluation purposes;
4. Appropriate parties in connection with financial aid to a student;
5. Organizations conducting certain studies for or on behalf of the school;
6. Accrediting organizations;
7. To comply with a judicial order or lawfully issued subpoena;
8. Appropriate officials in cases of health and safety emergencies; and
9. State and local authorities within a juvenile justice system

State law: Schools may disclose, without consent, "directory" information such as a student's name, address, telephone number, date and place of birth, honors and awards, and dates of attendance. However, schools must tell parents and eligible students about directory information and allow parents and eligible students a reasonable amount of time to request that the school not disclose directory information about them. Schools must notify parents and eligible students annually of their rights under [FERPA](#).

Ten Elements of High-Quality Programming

The Agency of Education has identified ten elements of high-quality afterschool programming. The ten elements can be used to guide effort in work planning, programming, and evaluation. These areas are used in many ways in the system (i.e. assessment and evaluation, grant applications, professional development):

- Strong and Effective Afterschool Program Leadership
- Linkages to the School Day
- High-Quality Staff
- Safe and Appropriate Environments
- High-Interest Programming
- School Leadership Support
- Attention to Serving Regular Attendees

- Strong Instructional Leadership
- Flexible Structures and Student Choice
- Effective Community Partnerships

Professional Development for High Quality Programming

Vermont Afterschool Inc. has a contract with AOE, which provides services to the 21C funded community in the area of professional development, evaluation, and technical assistance. One of the major initiatives is an afterschool professional learning strand in which all directors are required to participate. In 2020-21, there will be one unified Director’s strand. Meetings dates (virtual or in-person) will be determined and shared with all Directors. Strands vary each year with the core design being to meet the needs of 21C funded project directors and others.

The Social-Emotional Learning Youth Program Quality Assessment System (SELPQA) is required of all 21C-funded programs in year two of funding or beyond. In this system, leaders and others receive training, local teams observe programs, evaluate and analyze results, and build program improvement plans (PIPs) that are implemented over time. The assessment cycle starts in the fall and directors will want to start planning for this each summer. While there is an “annual cycle,” implementation is best conceived as being completed on a continuum from year to year during all program sessions. This system is “low stakes,” and not tied to any AOE evaluation or performance of programs.

Vermont Afterschool offers numerous workshops and other professional development opportunities throughout the year targeted to the needs of afterschool programs. Workshops vary in duration and in some cases can be delivered on-site upon request. This is a great way to bring in new content and training topics to an entire staff at the program location and at an affordable cost.

The Annual Vermont Afterschool Conference is typically held annually in Stowe each fall. Each year the conference includes a nationally recognized keynote speaker, two or three full-day strands for those who want to dive into a topic deeply, and more than 25 additional workshops for those looking to explore a range of topics. The conference includes options appropriate for directors, site coordinators, and staff and is a once a year large statewide networking and professional development opportunity. The [Vermont afterschool website](#) also includes regular updated content. (I.e. see Resources and STEM initiative sections)

Key Concepts

Eligibility

All youth from allowable/approved grades from the participating community are eligible to participate in programming. This includes youth who attend a private school in the community, home schooled youth, and summer residents as well (all youth in the funded community). No youth may be forced or required to attend. Youth from non-21C funded communities generally may not participate. Within the law, smaller numbers of youth from non-funded communities may participate, if approved by AOE, yet in general a very high burden of proof is required for approval. Programs do have capacity limits and waiting lists may be required. Site based capacity limits should be understood and articulated as described in an approved application.

Generally, programs that serve more than 40 students daily are considered a “larger” program and additional supports beyond what an original application envisions are usually needed to maintain safety and quality. As programs grow over time, large programs of this size need to be mindful of larger program needs and amendments and significant adaptations are often needed.

Poverty and Opportunity Gaps

21C funds are open to serve all but at its heart are designed to provide opportunities for youth whose opportunities are limited or severally restricted relative to others. Very often this is related to income level or other individual family experiences or need. As such, programs should be extra attentive to the needs of these youth and their families. Understanding and intention within the areas of culture, barriers to participation, income levels, language used, and literacy levels for example, should be considered carefully to do everything possible to make every program welcoming and open to all. If a program charges any fee, extra attention should be given to these areas so that any barriers or perceived barriers to access are removed. Additionally, payment policies and written communications need to be scrutinized with a high degree of precision so that families are never discouraged from participating. As such, no student shall ever be turned away for inability to pay.

Regular Attendance

Regular attendance is a key baseline indicator that allows impact for participating youth to be possible. Regular attendance is tracked through state and federal reporting as 30 days or more, 30-59 days, 60-89 days, and 90 plus days. In addition, youth who are non-regular attendees are tracked as having participated for fewer than 30 days.

Youth Leadership and Engagement

Intention and implementation of strategies that enable youth leadership and voice to be an integral experience as part of a program are of paramount importance. Programs should be identifying and improving methods by which this occurs on a continual basis, appropriate to the ages served.

Sustaining your program

Grantees are expected to demonstrate a high level of performance and to meet sustainability in each year of funding. The Vermont definition of sustainability is “building and maintaining high quality programming.” It is important to realize that sustainability is not just about funding, but first and foremost about work that builds or leverage systems that will create and can maintain a high-quality program. For newer programs, it is important to keep the cart before the horse, which means that quality efforts need to be a priority, so that any funding work can build off of that success. Without quality, there is no worthwhile program to sustain.

The funding design takes these factors into consideration. For existing grantees, pending availability of federal funds and program performance, investments will be funded at 100% for the first three years of funding. In year four, programs must show a “sustainability” base and the grantee will receive 75% of the initial award. In year five, the applicant will receive 65% of

the initial investment. If a reapplication for an investment beyond year 5 is successful, new awards can be level-funded for five years at no more than 50% of the total program budget. Total budgets are expected to be maintained and, in many cases, project budgets do grow over time. The statements above all fall within and take place as part of the grant competition process.

The enormous task of sustaining a program could not possibly be covered in a manual. The statewide evaluation plan includes sustainability goals related to the funding component and each project must have an active sustainability plan. In truth, the statewide evaluation plan in its entirety is a sustainability plan. To assist in this effort the Agency of Education also tracks specific funding data by type and amount. Historical data in this area is available for projects. In the funding realm, the five biggest funding sources on a statewide level outside of 21C funds are school budgets, fees, subsidy reimbursements, title funds, and partnerships. While these are the big five, each project develops its own “market basket” and approach. As a small but important part of promoting sustainability and local buy-in, it is recommended to use the phrase “investment” as opposed to a “grant” when talking about receipt of 21C funds. The word “grant” implies a set of commonly held assumptions and beliefs that do not necessarily serve sustainability well. These funds are more accurately described as an investment in local Vermont communities and youth. In addition, local communities need to own their own programs.

Processes

Statewide Evaluation Plan

In June of 2014, a new statewide evaluation plan was implemented. The strategic goal of this work was to have a unified statewide plan that both the state and local projects could use for continuous improvement. A group of local projects and state personnel met to devise the plan collaboratively over the course of a year. All projects have formally adopted the plan. Reporting and site visit systems are closely aligned to it. Projects also have the option and are encouraged to create and track additional local evaluation measures that compliment this plan. Directors should be quite familiar with its contents and how any additional local evaluation measures compliment the statewide plan.

The plan has four overarching goals in the areas of access and equity, leadership, high quality programming, and sustainability. Twenty results are tracked through various reported indicators. The plan is also aligned to AOE strategic goals:

Mission: The State Board and Agency of Education provide leadership, support and oversight to ensure that the Vermont public education system enables each student to be successful.

Vision: Every learner completes his or her public education with the knowledge and skills necessary for success in college, continuing education, careers, and citizenship. The public education system provides flexible learning environments rich with 21st century tools that promote self-development, academic achievement, and active engagement in learning. It operates within a framework of high expectations for every learner with support from educators, families and the community.

21C Program Purpose: The 21 Century Community Learning Centers Program provides leadership and support by building and maintaining high quality afterschool and summer programs during non-school hours.

The statewide evaluation plan will be revised in 2020-21. In 2022, projects will report on new Federal GPRA measures to the USDOE and the state evaluation plan and reporting will be revised as well.

For more information on the current statewide plan see (See Appendix B) and full evaluation reports at [After School and Summer Programs](#)

21C Applications, Conditions, and Amendments

Each project's 21C approved application is the guiding document that drives implementation and is followed as articulated in each grant award. As part of the application process, certain changes may have been required and approved as a condition of funding. Throughout implementation, additional amendments may have been made or may need to be made. Directors should be clear and familiar with the application, conditions, and any amendments (see page 18). The state coordinator keeps these documents on file. Please see the [After School and Summer Programs](#) page for the Agency of Education.

Renewability

Rationale

The [Every Student Succeeds Act \(ESSA\)](#) allows a State Education Agency (SEA) to renew the Nita M. Lowey 21st Century Community Learning Center subgrants based on subgrantees' performance during the previous subgrant period [§4204(j)]. Results of local evaluations conducted in conjunction with the SEA's evaluation plan and a review of 2019-20 Annual Performance Reports shall be used to determine eligibility for renewal [§4205(b)(2)]. The United States Department of Education (US ED) has provided clarification that the renewability provision of ESSA may apply to subgrants awarded prior to July 1, 2017, with a limitation of "one time for one to five years, consistent with the terms of the original subgrant's performance period" [[Renewability of Awards: Every Student Succeeds Act \(ESSA\) MS PowerPoint.](#)]

Policy

Due to the challenges posed by COVID 19, and in order to maintain student safety and program quality during school year 2020-2021 in alignment with school reopening plans, the Vermont Agency of Education (AOE) is exercising its authority under the renewability provision of ESSA Section 4204(j), extending eligible subgrants a one-time, one-year grant extension based on satisfactory performance of the grantee in the previous year. This will allow for grantees whose grants expire on June 30, 2021 to expire on June 30, 2022. The additional year of the subgrant will be consistent with the terms of the original grant award. The AOE reserves the right to attach additional, reasonable conditions to the funding at its discretion.

Procedures and Conditions

- Superintendents of eligible entities must request intent to access the renewability provision by December 31, 2020.
- Performance must be maintained as determined by Annual Performance Reviews (APRs) as applied to all grantees in the system. This includes satisfactory performance

(See Appendix C)

Budgets and Amendments

The purpose of submitting a grant amendment is to assure that the federal requirements are being followed, that the goals of a project are being followed, and to inform and receive approval from the Vermont Agency of Education for any substantial project changes.

When to Submit an Amendment

- A change to the grant’s scope of work (see next page) or;
- A new code is requested for expenditure; or;
- A shift of more than 35% in any *GMS budget summary* tab fields (e.g. see subtotal row below):

Remove blank rows from display: Yes No

Code	Activity Description	100 - Personal Services Salaries	200 - Personal Services Employee Benefits	300 - Purchased Professional and Technical Services	400 - Purchased Property Services	500 - Other Purchased Services	600 - Supplies	700 - Property	730 - Equipment	800 - Subgrants Memberships and Misc	900 - Other Items	TOTAL
1000	Instruction	72,000.00	7,200.00									79,200.00 39.60 %
2190	Other Support Services - Students	48,600.00	4,860.00	12,240.00								65,700.00 32.85 %
2495	Administration of Grants	31,000.00	3,100.00			1,000.00						35,100.00 17.55 %
2716	Extra/Co-Curricular Transportation					20,000.00						20,000.00 10.00 %
	Subtotal	151,600.00 75.80 %	15,160.00 7.58 %	12,240.00 6.12 %		21,000.00 10.50 %						200,000.00 100.00 %
	Total Budget											200,000.00

- Last date for amendments are due April 1 annually

Process to Submit an Amendment

- Contact the 21C Coordinator to receive guidance on the needed description to justify the proposed changes within GMS in clear concise language
- Prepare an amended working Excel project budget showing the changes to be submitted in GMS.
- Submit within the online [Grants Management System](#)

Change of Scope Amendments

Changes to a scope of work include major changes to an approved application. Contact the state coordinator if you unsure if an anticipated change requires an amendment. Change of scope amendments include:

- Major changes due to COVID in the eight identified areas within the GMS system
- Any change to transportation that could affect access
- Any change to or initiation of program income collection
- Any shift in program approach

- Any change in program days offered
- Any change in grades or ages to be served
- Any shift in site coordinator or project director structure or paid hours
- Any new positions created
- Any change to program schedules
- Any change to site or center location (e.g.) due to renovations
- Any consolidation of programs or sites
- Major changes to summer programs
- Significant new equipment or supply purchases
- Any other substantial structural shifts

Do not expend dollars for which you do not have approval; this puts the funds at risk of an audit exception. You may not expend first and receive a “post-dated” approval after expenditure has already occurred. If changes are anticipated, ask early, submit first, and expend later. Any major changes should allow plenty of lead-time to receive approval. For example, do not submit amendments for summer programs changes in June after the April 1 deadline.

Online Grants Management System (GMS)

Each year in early June annual budgets are submitted and then entered with other information in June and approved within the state’s online grant management system known as *GMS*. In addition, business offices use this system to manage other AOE grant programs and to get funds reimbursed monthly throughout the year. Annual budgets are presumed to follow previous years’ approved budgets. Password Access to the *GMS* system can be gained through the district’s Superintendent, who must request access of AOE.

Carryover Funds

The 21C program in Vermont does not allow carry forward each year. Allocations are pre-determined by grant award amounts over five years as described at the initial time of approval. Funds that are “not spent” are pooled back and applied to the following year’s grant awards.

Program Income

Program income means gross income earned by the non-Federal entity that is directly generated by a supported activity or earned as a result of the Federal award during the grant award period. Program income includes but is not limited to income from fees for services performed, the use or rental of real or personal property acquired under Federal awards, the sale of commodities or items fabricated under a Federal award, license fees and royalties on patents and copyrights, and principal and interest on loans made with Federal award funds. Program income must be spent at least quarterly each year with an annual balance brought to zero each July 1st. Any program income remaining at the end of any grant year may be recaptured by the Agency of Education guided by federal rules. Program income generated through 21C funded programs are considered federal funds. See memos on program income at the 21C state website. See [Program Income](#).

21C Allowable Costs

The easiest method is to contact the 21C state coordinator. Also review:

1. Your approved grant application and any approved amendments
2. The Authorizing Statute, link on the AOE 21C webpage
3. EDGAR (Google it, large document of rules)
4. Circular A-87 A and B (Google it large document of rules)

Can I pay for a grant writer to help me find money? You, perhaps working with a team of people, can write and submit grants as a small part of your job responsibilities. You cannot hire someone whose main responsibility is to write grants and you cannot pay someone from federal 21C grant dollars to write grants for you in isolation.

Can I purchase t-shirts for the youth in my program? No.

Can the school use the laptops I bought for the grant be used during the school day? Yes, if the school contributed funds to the purchase of these laptops.

I would like to purchase flowers and gifts to give out at a staff appreciation lunch. Can I use grant funds? No. Food and gifts are considered entertainment costs and as such as not allowed under the grant. Gift cards may not be used at all.

Can I pay for tickets and travel for students to see a show on Broadway? Probably not but maybe. If a trip to New York and a Broadway show was an integral part of your grant program and if you could show that the trip is “necessary and reasonable” to best meet the objectives of the investment, then such a trip may be allowed.

I would like to put an ad in the local paper talking about our program and showing all the good stuff we do. How much can I spend? You cannot use grant funds to advertise or “sell” your program by purchasing time or space in local media sources. You can only use grant funds to advertise job openings and to recruit staff.

Can I buy a cell phone to use and pay the monthly charges? Yes, but be careful to allow only business-related calls on the phone. You cannot pay for cell phone minutes for personal calls.

I would like to lengthen my summer program from 5 weeks to 7 weeks and contract with a partner to tutor instead of using school-based certified teachers. OK? You would need to submit an amendment request because either of the above changes would signify a change of project scope. Anytime you want to change the structure of your programs in a significant manner, check with AOE before submission to receive guidance.

My school wants to jointly fund a climbing wall with us. Can I get an amendment to help pay for the wall and equipment? No. Items such as climbing walls and ropes courses are considered permanent structures and thus construction costs. No money can be used for construction costs.

EDGAR Rules: For purposes of this subsection 15, the following definitions apply:

(1) "Capital Expenditures" means expenditures for the acquisition cost of capital assets (equipment, buildings, land), or expenditures to make improvements to capital assets that materially increase their value or useful life. Acquisition cost means the cost of the asset including the cost to put it in place. Acquisition cost for equipment, for example, means the net

invoice price of the equipment, including the cost of any modifications, attachments, accessories, or auxiliary apparatus necessary to make it usable for the purpose for which it is acquired. Ancillary charges, such as taxes, duty, and protective in transit insurance, freight, and installation may be included in, or excluded from the acquisition cost in accordance with the governmental unit's regular accounting practices.

(2) "Equipment" means an article of nonexpendable, tangible personal property having a useful life of more than one year and an acquisition cost which equals or exceeds the lesser of the capitalization level established by the governmental unit for financial statement purposes, or \$5000.

(3) "Special purpose equipment" means equipment which is used only for research, medical, scientific, or other technical activities. Examples of special purpose equipment include microscopes, x-ray machines, surgical instruments, and spectrometers.

(4) "General purpose equipment" means equipment, which is not limited to research, medical, scientific or other technical activities. Examples include office equipment and furnishings, modular offices, telephone networks, information technology equipment and systems, air conditioning equipment, reproduction and printing equipment, and motor vehicles.

b. The following rules of allowability shall apply to equipment and other capital expenditures:

(1) Capital expenditures for general purpose equipment, buildings, and land are unallowable as direct charges, except where approved in advance by the awarding agency.

(2) Capital expenditures for special purpose equipment are allowable as direct costs, provided that items with a unit cost of \$5000 or more have the prior approval of the awarding agency.

(3) Capital expenditures for improvements to land, buildings, or equipment which materially increase their value or useful life are unallowable as a direct cost except with the prior approval of the awarding agency.

There is another school in my district that I would like to add to our project. Can AOE give our project more money? By law all investments are awarded competitively only when a grant competition occurs so additional funding cannot be awarded.

Can program income be banked and then used at the end of the grant period (Year 6)? Only unrestricted gifts or donations that come into the program (gifts that come in not exchange for attending a program) may be banked across years as long as a separate accounting 'cost center' is created. Fees that are called donations must be spent first within each year at least quarterly (see Appendix C).

Can we serve Kindergarten students in the summer before school starts? Only if approved in a 21C application. Note: based on a developmental rationale, some programs only begin serving (k) students half way through the year.

Can we share equipment between the school and the after-school programs? Could there be an in-kind contribution or a trade of equipment or does there need to be actual money involved to share costs?

Generally, if equipment is purchased and the original intent was to use it during afterschool and in school as well, some form of a cost share is expected as 21C funds are designed to support out of school hour programs, not 'in-school' education. Generally, this would be a 50/50 cost share. This type of expenditure needs to be pre-approved by the state coordinator

If purchases were made and the intent was designed for an afterschool program only and now the equipment can be leveraged and used during in-school time, there is no prohibition, as long as the equipment is still used and available for the afterschool program. In all cases the use would be prioritized for afterschool use. If equipment is broken or lost as a result of in-school use some form of equitable cost sharing is expected, so that the original purchase and use can be maintained.

Supplanting

Funding from the 21st Century Community Learning Center investment may only be used to supplement, and to the extent practical, increase the level of funds that would, in the absence of the Federal funds, be made available from non-Federal sources for the education of participating students. In no case may a grant recipient use Federal program funds to supplant funds from non-Federal sources.

To determine whether not an example is supplanting, consider “What would have occurred in the absence of the grant?” If alternate funds would have been available, then using grant funds would be considered supplanting. Another way to conceptualize this is that other funds are spent first and expenditure is never knowingly shifted onto the taxpayer through the 21C fund award when other funds exist (and have been paying and remain available) to pay for a grant activity.

Also, OMB Circular A-133 Compliance Supplement (Department of Education, section III G 2.2) offers the following guidance:

- Supplanting is presumed to have occurred if:
- The State Education Agency (SEA) or Local Education Agency (LEA) used Federal funds to provide services that the SEA or LEA was required to make available under other Federal, State or local laws.
- The SEA or LEA used Federal funds to provide services that the SEA or LEA provided with non-Federal funds in the prior year.

The Compliance Supplement goes on to explain that “these presumptions are rebuttable if the SEA or LEA can demonstrate that it would not have provided the services in question with non-Federal funds had the Federal funds not been available.”

Food for Meetings and Events

Federal funds can be used when they are deemed necessary to meet the goals and objectives of a federal grant. For 21st CCLC programs, providing snacks and/or meals (as appropriate) during the course of the program is considered necessary to mitigate risk and achieve the academic and social outcomes provided for by the investment.

For staff, partner, and other business meetings, the general rule is that participants should be purchasing/providing their own food, beverages, and snacks. However, for activities involving families, additional clarification regarding this FAQ has since been issued (July 2014) that permits an LEA to provide refreshments for parents at family literacy activities in order to facilitate parent attendance at those meetings. The FAQ above “is generally intended to apply to professional meetings, including those that you may have with LEA staff, and not to school-

based events such as a Title I parent meeting” or 21st CCLC family literacy activity. “As a result, as long as there is a connection to a programmatic purpose and the cost is reasonable, an LEA may continue to provide food” for these events.

Private School Participation

Grantees are required to provide students enrolled in private schools located in the funded community with a genuine opportunity for equitable participation. To ensure equity, programs must consult with local private schools during the annual design and development of their projects on an on-going basis, at least two times per year. Documentation of on -going consultation with private schools is required. Generally, letters of invite to consult and brochures are sent to local independent schools at a minimum.

Right to Appeal Decisions

Federal law allows due process with regard to decision making and a right to appeal any decision with regard to use of federal funds.

Disposition/End of Grant

If an investment ends and is not refunded at the end of a five-year award period there are procedures related to remaining funds, reporting, inventory, equipment and supplies that need to be followed. Grantees will receive specific instructions in the event of this situation.

Appendix A- 21C Safety Standards

1. Safety policies are clearly articulated in writing, shared with all parties (e.g., parents, staff, school), and followed accordingly.
2. Written safety policies include procedures for incidents, emergencies, aquatic activities, mandated reporting, bullying, injuries, transportation, weather-related concerns, staff behavior, student behavior, record keeping, confidentiality, and parent communication.
3. Clear sign in/ sign out procedures are established, staff follow up on any absentees, and every child is accounted for before being released.
4. The program uses spaces and student-teacher ratios that are appropriate and safe. (Recommendations are 1-2:1 for tutoring; 1:5 for homework help and small group work; 10:1 for most programs)
5. Grantee has completed a review of state school age care licensing regulations and have adapted practices so that each elementary site could pass licensure (if applicable).
6. CPR/first aid trained staff are always on-site and if a student(s) needs an EPI Pen, a plan and training for usage of the EPI Pen is in place.
7. Procedures are in place for identifying and planning on behalf of individual students who have serious allergies such as a peanut allergy.
8. Director is aware of any special needs and makes sure that staff are able to handle them appropriately or that accommodations are made.
9. First aid kits are available and well-stocked
10. Telephones or mobile devices are available for communication between staff, parents, and others.
11. Director and staff have well organized paperwork including: who is present, what programs they are attending, how they are going home, signed permission slips from parents, emergency contact and health information.
12. The program follows the guidelines and requirements of mandated reporting.
13. Students are offered a healthy snack or meal each day following proper nutrition guidelines.
14. Procedures and strategies are in place so that every student feels physically and emotionally safe in the program
15. Program activities, materials, and spaces are age- and developmentally appropriate.
16. Any issues, problems, and incidents that arise during the afterschool program are communicated to the appropriate school day personnel the next school morning
17. Program leaders have met with school personnel and have generated written afterschool procedures linked to the schools' safety plan, including options-based responses to violent intruders.
18. All afterschool and summer staff, (including part time non- school staff) have received and reviewed written procedures and training for emergency procedures and commands, including options-based responses to violent intruders.
19. All afterschool and summer staff, (including part time non- school staff) have reviewed regular program space to determine what to do and where to go including as part of options-based responses to violent intruders.
20. Programs complete two drills during the school year during afterschool time and one during the summer if the program has a new configuration involving children from multiple schools.
21. Programs review and follow the [Vermont Crisis Guide](#), school sponsored After-School program section.

Appendix B- 21C Statewide Evaluation Plan (Goals and Results)

Goal 1: Access and Equity is assured for all students

Result 1.1 - 21C funded programs serve students who have limited opportunities to learn outside of the school day.

Result 1.2 - 21C funded programs are open for enough hours, days, and weeks to meet student and family needs during the school year.

Result 1.3 - 21C funded programs provide enough summer programming to address summer learning loss.

Result 1.4 - 21C funded programs have a solid base of regular attendees.

GOAL 2: ALL PROGRAMS ARE OF HIGH QUALITY

Result 2.1 - 21C funded programs support learning.

Result 2.2 - 21C funded programs allow participants to experience interests in depth.

Result 2.3 - 21C funded programs provide healthy food and physical activity.

Result 2.4 - 21C funded programs strive for continuous improvement through the use of the Youth Quality Program Intervention (YPQI).

Goal 3: 21C funded programs are led by effective leaders

Result 3.1 - 21C funded programs are led by experienced leaders.

Result 3.2 - 21C funded programs utilize high quality staff to run programs.

Result 3.3 - 21C funded programs have appropriate staff retention rates.

Result 3.4 - 21C leaders participate in professional development and networking opportunities.

Result 3.5 - All staff are kind, fair, and have high standards.

Goal 4: Programs are sustainable

Result 4.1 - 21C funded programs link with the school day.

Result 4.2 - 21C funded programs utilize diverse sources of funding.

Result 4.3 - 21C funded programs benefit from meaningful community partnerships

Appendix C-21C Financial Do's and Don'ts

Financial Questions	Do...	Don't...
21C fund expenditure	Anticipated expenditure must be reasonable AND necessary, allocable and documented. Expenditure must be in line with your approved application and project goals. Contact the state coordinator for guidance if there is ever a question. Tip: Ask 3-5 people for their opinion if an item is reasonable and necessary and then discuss with the state coordinator.	Don't spend on any questionable items prior to approval. Don't spend on items for during the school day. Never co-mingle 21C funds with other funds in the accounting record.
21C budget amendments	Get approval before expenditure occurs. Do know the 10% rule. Always check budget changes 'in the thousands' with the 21C coordinator for guidance with what will need to be done.	Don't use the amendment deadline (April annually) to reconcile accounts. Never back spending or back date account information.
Bidding	Follow local Supervisory bidding policies.	
Carryforward	Carryforward is not allowed with 21C funds.	Don't spend for spending sake between April- June, particularly for expensive and/or newly conceived items without pre-approval.
Construction	--	Don't pay for construction or renovation type costs. These capital expenditures for improvements to land, buildings, or equipment which materially increase their value are not allowed.
Contracts	Make sure you have a complete contract signed and dated by both parties before the work begins in line with local district contracting policy.	Never enter into contracts via word of mouth.
Donations	Do bank unrestricted donations for future use if needed. A separate accounting account must be kept.	Don't think the word donation on a brochure means you can bank that money. A fee labeled as a donation or a contribution is still considered program income and must still be spent first.
Entertainment		Entertainment costs are not allowable.
Equipment	"Equipment" is very specifically defined in federal regulations and involves a more rigorous process of inventory. Single laptops are considered supplies.	--

Financial Questions	Do...	Don't...
Food for adults	Do apply the reasonable and necessary test; must be part of a necessary program.	Don't buy food for staff meetings with federal funds.
Fee Income	Do use program income for program expenses before drawing down federal funds. Fee income should be used and spent down first, in line with the reimbursement system.	Never "bank" program income (fees and subsidy payments) beyond June 30 th each year.
Gift Cards		Don't use them, you can't.
Grant Period	Make sure to pay very close attention to expenditures that are close or that could cross the grant year.	Never obligate federal funds outside the grant award period (July 1-June 30, annually).
Inventories	Do make sure inventories are conducted bi-annually and preferably annually.	--
Mileage Reimbursement to Employees	Do make sure the purpose of the mileage being reimbursed is well documented on mileage reimbursement forms.	Don't reimburse employees for mileage unless the purpose of the trip is detailed on their submission request. Just putting the name of a school travelled to is not adequate documentation. Don't pay for a commute.
Procurement	Do make sure to follow federal, state, and local procurement policies and DOCUMENT procurement for all purchases made with federal dollars.	--
Retirement Benefit		Don't pay retirement for licensed teachers who are <u>not</u> in the teacher retirement system, or for paraprofessionals.
Time and Effort	Do make sure all employees paid in whole or in part with federal grant funds are completing compliant time and effort documentation. When using a blanket periodic certification for employees working on the same sole cost objective, do make sure certifications are completed separately for each site and signed by a "Supervisor with direct knowledge"	Don't assume timesheets cover this requirement. Don't assume the grant manager is always the appropriate signature on periodic certifications.
Title 1 expenditure within a 21C funded program	Make sure actual activity is eligible for Title I – including that teachers are HQT. (check with Title I Grant Manager)	Don't assume all extended day/extended year or afterschool activities are eligible as a Title I expense. They are not.

Financial Questions	Do...	Don't...
	All Title I dollars must be documented as allocable to the Title I program.	Don't transfer a lump sum of Title I funds into the Afterschool program with the intent to spend it on anything.
	Treat work eligible for Title 1 as its' own cost objective for time and effort reporting purposes. (This may mean some staff move from a periodic certification to a personnel activity report.)	Don't record time and effort for Title I eligible work as 21C Program activity; separate the two.
	Know if Title 1 eligibility and expenditure for each school must follow rules as a schoolwide program, or as a targeted assistance program: in a Title I Schoolwide program, all students are eligible to be served, but in a Title I targeted assistance school or a district/SU wide program, the students must be on the Title I caseload.	
Supplanting of Federal Funds	Do spend on new activities articulated in the grant application.	Never supplant local funds with federal funds. Supplanting is presumed, if year to previous year, in the absence of federal funds, activities would have occurred at the same level.

Appendix D-Quick Reference Guide for Bullying and Harassment

All afterschool staff should be familiar with strategies for preventing and responding to incidents of bullying and harassment. All procedures should be consistent with those practiced by sending schools and the requirements of Vermont Rules and Regulations.

While not always, both bullying and harassment are often driven by the student who bullies/harasses need for attention. A clear protocol should be established when staff or fellow students witness or are the target of bullying.

For students, enlisting the bystanders in redirecting attention away from the student who bullies is a primary prevention strategy. A universally practiced stop signal can be an effective strategy when taught to all and practiced. Commonly referred to as stop, walk and talk all students are taught this simple strategy:

1. Use the stop signal when bullying behavior is seen or experienced
2. Join the target of the bullying and physically leave the area
3. Report the behavior to an adult

Staff must also have a protocol on how to intervene when bullying is observed.

1. Name the behavior, name a pro-social alternative behavior and intervene immediately with instructions to stop and replace the bullying behavior with pro-social behavior. If Stop Walk and Talk is employed the adult should focus on that strategy when intervening.
2. Report the behavior to the program director
3. Be vigilant about reoccurrences of the behaviors

While there are many bully/harassment prevention programs and strategies, an on-going curriculum can be introduced that lays a foundation for prevention. The following sites are places to begin exploring prevention strategies

A set of lessons for elementary schools: [PBIs](#)

A set of lessons for middle and high school: [Bully and Harassment Prevention-PBIs](#)

Two comprehensive national sites for information:

- [Stop Bullying](#)
- [Stop Bullying Now](#)

Appendix E-Amendment for Use of Non-School Building as 21C Center

The Every Student Succeeds Act Sec 4301(c)-Approval of Certain Applications-the State educational agency may approve an application under this part for a program located in a facility other than an elementary school or secondary school only if the program will be at least as available and accessible to the students to be served as if the program were located in an elementary school or secondary school.

Amendment components to include in GMS system:

- 1) Rationale/Reason for amendment change
- 2) Name/Address of center
- 3) Ages/Grades attending center
- 4) Dates Center will be used:
- 5) Stated capacity number at alternate site:
- 6) List any adaptations made, if any in the note's column
- 7) Input as part of GMS submission

Item Checklist

Item	Yes	No or unknown	Notes
Site is Safe and Accessible as legal assurance signed in GMS			These are signed by the Superintendent. The Superintendent should have enough knowledge to execute an informed signature. The standard assurance language does not mention specific sites.
Assurance naming alternate actual location and address within GMS			Follow guidance from state coordinator
Has the site been visited to analyze safety?			List names and titles
For elementary school youth, site approved for afterschool child care programs- state licensure or;			If required by licensing or in grant plan(see link below)
Site deemed aligned or exceeding licensure by SU (see link below)			Child Care Licensing Regulations (Afterschool care programs) read pages 32-41. Check any concerns with AOE. State law: 21C programs exempt from licensure, but alignment still expected in the interest of safety and due diligence

Building Access/Egress			Are changes/adaptations to building access/egress needed?
Transportation/Bussing Plan			Are changes to any transportation plan needed?
Emergency Planning			Are changes to emergency planning needed: Drills, protocols, communications, evacuations, specific items for focused training?
Wilderness Safety			Does the site include forests for regular wilderness adventures that include additional risks or may necessitate tighter ratios or other new safety policies or procedures?
Aquatic Plan			Do aquatic plans need to be updated due to the specifics of the site?
Tick Control and Lyme disease			Does the land on the site require/need basic education and training, preparation and avoidance (clothing, risk factors, DEET); tick checking, and communication with families?
Dangerous Weather			Does the location require any new protocols related to dangerous weather?
Staffing Plan			Does the site require a change to the current program staffing plan due to location specifics? (In particular to ratios?)
Traffic			Is the site near traffic, roads, or driveways/parking lots that require adaptations or new protocols and training for staff to mitigate against accidents with vehicles?
Does the Director have any safety concerns about the site not covered in this checklist?			If Yes, List.

[Department for Children and Families Childcare Licensing Regulations](#)

Appendix F - Glossary of Terms and Common Acronyms

21C — (21CCLC) (21st Century) 21st Century Community Learning Centers; a federal program under Title IV part B of the Elementary and Secondary Education Act.

AFTERSCHOOL—a generic term denoting a period of time or a structured program for youth that occurs anytime outside of the school day. This can include activities and programs that can occur: before school, afterschool, during the summer, and on weekends, evenings, and school vacations.

APLS— Afterschool Professional Learning Strands. Formally ISSAP- (Individual System of Support for Afterschool Professionals)

A*VISTA — AmeriCorps Volunteer in Service to America

AOE — (VTAOE) Vermont Agency of Education

APR — Annual Performance Report

ASP — After School programs; programs that provide services to youth during out-of-school hours Also the Afterschool Snack Program, a federal program of the US Department of Agriculture.

CACFP —Child and Adult Care Food Program

COMMON CORE— A set of high-quality academic standards in mathematics and English language arts/literacy (ELA). These learning goals outline what a student should know and be able to do at the end of each grade

DCF — Department of Children and Families

EDGAR — Education Department General Administrative Requirements; federal regulations governing the management and use of federal funds

ELL —English Language Learners; or a school-based program that provides support to youth whose home language is not English

ELO—Extended Learning Opportunities

ESEA—Elementary and Secondary Education Act; the federal congressional legislation that governs most educational programs

ESSA—Every Student Succeeds Act: New name for ESEA; has replaced NCLB.

FERPA— Family Educational Rights and Privacy Act. The law governing confidentiality of student and family information

GMS — The online grants management system the VTAOE uses to award grants and manage payments. This newer system managed by the vendor MTW, was released in 2018.

IEP— An Individualized Education Program (IEP) is a written statement of the educational program designed to meet a child's individual needs. Every child who receives special education services must have an IEP.

INVESTMENT— preferred term for '21C grant' to assist with local buy-in

LEA—Local Education Agency; an entity which operates local primary or secondary schools, often a school district.

MOA or MOU – Memorandum of Agreement or Memorandum of Understanding; written and signed agreement between two or more organizations to outline the terms of a partnership.

NGSS— [Next Generation Science Standards](#) The NGSS are science standards adopted by Vermont that reflect what students should know and be able to do in core ideas, scientific and engineering processes, and cross-cutting concepts.

NCLB—No Child Left Behind Act. The older common name for the (ESEA), which is now called Every Student Succeeds Act (ESSA).

NSLP – National School Lunch Program

PARTNER— is an entity or an individual that provides varying levels of support and/or enhancement to grant related programming. The support may come in multiple forms comprising financial contributions, in-kind contributions, volunteer participation, or provision of program components directly connected to the fulfillment of the partner organizations' aligned missions.

PBGR—Proficiency-Based Graduation Requirements. The locally delineated set of content knowledge and skills connected to state standards that, when supplemented with any additional locally developed requirements, have been determined to qualify a student for earning a high school diploma. Also, **PBL** – Proficiency Based Learning—the learning system employed to meet PBGRs

PBIS—Positive Behavioral Interventions and Supports

Personalized Learning —Systems and approaches that deepen student learning by incorporating each student's strengths, needs and interests - including student voice and choice in what, how, when and where they learn - to achieve the goals of active engagement, academic success, and preparation for post-secondary opportunities

PLPs— Personalized Learning Plans

REGULAR ATTENDEES are youth who participate in afterschool programming for 30 or more days in a single program year (baseline state definition for state reporting purposes). The federal definition has three tiers for reporting: 30-59 days, 60-89 days, and 90 plus days.

RFP – Request for Proposals; directions outlining the format and process for applying for funding; a grant application.

SBAC—The **Smarter Balanced Assessment Consortium**) is a standardized test consortium. It creates Common Core State Standards-aligned tests ("adaptive online exams") to be used in several states including Vermont. It uses automated essay scoring

SEA—State Education Agency; such as the Vermont Agency of Education

SEL- Social Emotional Learning.

STEM/STEAM – Science, Technology, Engineering, Arts and Mathematics activities that align to the NGSS framework.

SUSTAINABILITY— The process of building and maintaining a high-quality program

TITLE IV PART B— Title IV, Part B; section of the Elementary and Secondary Education Act legislation that outlines provisions for the 21st Century Community Learning Center Program

TRANSFERABLE SKILLS— A broad set of knowledge, skills, work habits, and character traits that are believed to be critically important to success in today's world, particularly in collegiate programs and modern careers. Transferable skills include communication, collaboration, creativity, innovation, inquiry, problem solving and the use of technology are included in the [Education Quality Standards \(EQS\)](#) as adopted.

USDOE—United States Department of Education. Also known as (ED)

VERMONT AFTERSCHOOL— a non-profit organization dedicated to afterschool that holds a contract with AOE for afterschool services.

WIKI (the wiki)-[Front Page](#)

YPQA/YPQI— Youth Program Quality Intervention (or Assessment). A new system is the SELPQA