21st CCLC Fall Workshop – October 8, 2019
Questions and Answers

Grantees submitted the following questions at the Fall Workshop, and ISBE principal consultants provided the answers appearing below.

**Basics of 21APR**

1. **When will IRC connect to APR in the manner intended?**

   As of today, there is no set date as to when this will occur. However, ISBE staff is working diligently to move toward automation.

2. **Can they create a system/document/tool for a better way to enter accurate data?**

   Until automation occurs, grantees will need to continue to use 21APR and the Data Warehouse and Benchmarking Tool. Grantee feedback is always welcome for improvements to the Data Warehouse and Benchmarking Tool.

**What's New With Programmatic Monitoring**

1. **How are each of the six (6) core areas weighted? (i.e., fiscal the highest)**

   The core areas are weighted individually and change yearly based on the data points.

2. **Is there a numeric percentage that determines whether we are in Tier II or Tier III?**

   Yes, a numeric percentage is used.

3. **What exactly are you looking for in programmatic monitoring? Specifics!**

   A variety of items are used for programmatic monitoring. A list will be posted on the Illinois Quality Afterschool and Illinois State Board of Education websites.

4. **What is the purpose of the biannual call?**

   The purpose of the biannual call will be to review current grants, Corrective Action plans, and provide open communication with grantees and ISBE.

5. **What is the difference between a desk audit and site visit audit?**

   Desktop monitoring materials are sent to ISBE staff and reviewed. During a site visit, ISBE staff physically visit your site or sites.
Federal and State Monitoring

1. School versus CBO responsibility as it pertains to FERPA?

Per the federal regulations established at 34 CFR 99, the FERPA responsibilities apply to any educational agency or institution to which funds have been made available under any program administered by the U.S. Department of Education. This includes CBOs and also includes the 21st CCLC program.

2. Who do we reach out to with questions?

Please direct questions to your assigned principal consultant. They will share those questions with Federal and State Monitoring for responses as necessary. CAUTION: We will not be able to respond to specific questions related to the circumstances of a specific entity. We will only be able to respond to general questions, and a review of the specific facts during a subsequent monitoring visit may reveal other issues that were not known or considered when the initial response was prepared. Please review the regulations referenced during the presentation.

3. If tech is less than $500 per unit, does it need to be reported in grant and monitored in the same way?

In general, items such as those described in this question may be treated as supplies. Sufficient internal controls must be in place for items that are less than $500 to ensure proper usage of each item purchased, and the grantee must be able to reconcile the items purchased with a physical accounting of the whereabouts and use of the items (i.e., The grantee purchased 50 tech items costing under $500 over the past two grant years with no identified loss, damage, or theft. The grantee must be able to demonstrate where all 50 items are if asked during a visit.) All instances of loss, damage, or theft must be noted and investigated. All other allowability requirements remain. The purchases must be necessary, reasonable, accorded consistent treatment with items purchased under other funding sources, used to support the grant for which funding was utilized, allocable to the grant for which funding was utilized, adequately documented, etc. 2 CFR 200 is a great source for such information. You may find much of the information related to allowability in 2 CFR 200 Subpart E – Cost Principles. Some specific information may be found at 2 CFR 200.313 (Equipment), 200.303 (Internal Controls), 200.302 (Financial Management), and 200.53 (Improper Payment) to name a few. This is not an exhaustive list, and grantees are encouraged to become familiar with all aspects of the federal rules and regulations.

Electronic Code for Federal Regulations
https://www.ecfr.gov/cgi-bin/text-idx?SID=daf9f454d79344ef884779e46a9acd2f&node=pt2.1.200&rgn=div5#_top
4. How does the information apply to smaller organizations?

The federal requirements apply to all grantees regardless of size. However, policies and procedures must be tailored to meet the needs, circumstances, and specific operating structure of each individual grantee to ensure compliance with the requirements.

5. Does ISBE ever share information with accountant instead of director to relay?

Federal and State Monitoring Division reserves the right to speak to any key or related parties needed in order to complete our state and federally mandated monitoring responsibilities. All issues noted during a review will be shared with the director, and an opportunity to respond will be given.

**Statewide Program Evaluation**

1. Why does it have to be so complicated?

The statewide program evaluation aims to understand efforts across 143 grantees to meet the 7 statewide program objectives. While all 21st CCLC grants are working toward a common set of objectives, the individual programs are incredibly diverse and there are limited shared measurements across all of the programs. Therefore, this is a complicated task, and the evaluation collects a wide range of data in order to best capture, understand, and describe the full breadth and depth of the work of the program.

Over the years, the evaluation team and ISBE has worked to simplify and streamline the expectations for data collection and reporting for grantees. The local evaluation report template aims to provide a clear structure as well as flexibility to be useful across the diverse grantees. The annual spring survey similarly aims to collect basic information about implementation and outputs. These two grantee activities serve as the basis for the statewide evaluation, in addition to the available 21APR data. Both the local evaluation report and the spring survey have been revised and honed in response to feedback from ISBE and grantees.

2. Could there be syncing of all records/documentation into a universal database for 21st CCLC program that fed into evaluation?

The development of the IIRC data and benchmarking tool over the past two years has provided the first opportunity for the evaluation and ISBE to move in this direction. As grantees have begun using that system and those data have started to become available to the evaluation, the evaluation team is working with ISBE and the IIRC team to coordinate data collection and record keeping. It is a work in progress. However, there will always be some data that are required by the evaluation and not by other systems, and vice versa.
3. Could it be earlier? How do I use it annually if I am not getting reports in until after the program has re-started for the subsequent year?

Grantees are welcome to complete their annual reports earlier if they choose to do so. The evaluation team will gladly accept them. The reason the local evaluation report is due at the end of November is in response to many grantees’ expressed challenges with getting academic achievement and test score data any earlier. By having the report due at this time, most grantees are able to incorporate those data into their reports. If you have access to the data you need in order to write your report earlier—for example, over the summer—you can go ahead and complete your evaluation and use it in a timely manner.

4. Is there [the] possibility of getting feedback on the actual evaluation (from EDC) on the evaluation’s quality and usefulness?

Given the large number of grantees, it is not possible for EDC to provide individual feedback on local evaluation report quality. EDC does work to identify common challenges or gaps in reporting and provide information and technical assistance to address those through conference workshops and webinars.

5. Can we receive timely feedback on program quality from EDC and/or ISBE?

It is important to remember that with regard to the statewide evaluation, EDC is ISBE’s client. EDC strives to provide timely and actionable feedback to ISBE based on aggregated findings. To some extent, it is incumbent upon grantees to work with their local evaluators to consider findings about program quality and solicit feedback on individual sites and programs.

As noted above, given the number of grantees, it would be a real challenge to provide timely feedback to each grantee on an individual basis. EDC works to provide feedback to grantees on its findings from the statewide evaluation by sharing the annual report and site visit findings through webinars and conference meetings.