

California Department of Education

Expanded Learning Division

21st Century High School
After School Safety and
Enrichment for Teens
(ASSETs)
Frequently Asked
Questions (FAQs)

July 2017

**California Department of Education
21st Century High School ASSETs Program
FAQs**

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**California *Education Code* for 21st Community
High School ASSETs can be found [here](#)**

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I. Legislative Authorization for the 21st Century High School After School Safety and Enrichment for Teens Program (hereinafter referred to as ASSETs)

A. Every Student Succeeds Act

1. Q—What legislation mandates the establishment of the ASSETs Program?

A—The Every Student Succeeds Act (ESSA) was signed into law on December 10, 2015. The ESSA or reauthorization of the Elementary and Secondary Education Act takes effect in school year 2016–17. The ESSA provides funding for and maintains the 21st Century Community Learning Centers Program for ASSETs as a stand-alone program that supports expanded learning programs. (California *Education Code* [EC] sections 8420–8428).

B. 21st Century High School ASSETs Grant

2. Q—What is the ASSETs grant?

A—The ASSETs grant provides incentives for establishing before and after school enrichment programs that partner with schools and communities to provide academic support; safe, constructive alternatives for high school students; and assistance in meeting graduation requirements. Programs may operate after school only, or after school and any combination of before school, weekends, summer, intersession, and vacation. Each program must consist of three elements: academic assistance, educational enrichment, and family literacy services. Any public or private organization is eligible to apply for an ASSETs grant including the following entities:

- Local educational agencies (LEAs), including school districts, county offices of education (COEs), direct-funded charter high schools, institutions of higher learning
- Community-based organizations (CBOs), including faith-based organizations
- Indian Tribe or Tribal Organization
- Another public or private entity

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- Consortia of two or more of the above agencies, organizations, or entities

This state-administered, federally funded program provides five-year grant funding to establish or expand before school, after-school and summer programs that provide disadvantaged students (particularly students who attend schools in need of improvement) academic enrichment opportunities and supportive services to help the students meet state and local standards in core content areas. The programs are created through partnerships between schools and local community resources, and must meet program compliance requirements. Under ESSA, priority will be given to applicants who intend to:

- Serve students who attend school wide Title I schools implementing comprehensive support and improvement activities
- Enroll students who may be at risk for academic failure, drop out, criminal or delinquent activities, or who may need positive role models, as well as their families
- Submit a joint application from an LEA and a community-based organization or another public or private entity
- Add or expand accessibility to high quality after school programs

Under the *EC*, priority will be given to applicants that have the following:

- Previously received funding pursuant to Section 8421, for expansion of existing grants up to the per site maximum
- A plan to replace expiring grants that have satisfactorily met their projected attendance goals (*EC* Section 8422[a])

3. Q—When are the ASSETs grant applications submitted to the California Department of Education (CDE) for funding?

A—The ASSETs grants are funded for five years. However, the Request for Applications (RFA) are posted and new funds are awarded only during the first three consecutive years, followed by a two year break. The ASSETs RFA is generally released in the fall. Applications are generally due three months after the RFA is posted.

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To obtain information about the ASSETs RFA requirements and process, go to the CDE Funding and Fiscal Management Web page at <http://www.cde.ca.gov/ls/ba/as/fiscal.asp>.

4. Q—How much can I receive in ASSETs funding per year?

A—The *EC* sets the maximum total after school grant amount at \$250,000 per year for high schools (*EC* Section 8426[a]).

C. Renewals

5. Q—What is the process to renew an ASSETs grant after five years?

A—The ASSETs RFAs are limited to a five year term without renewal. One priority point will be awarded to all program sites that have had an ASSETs grant in the past. To see the list of all of the priorities, refer to Question 2.

II. Grant Administration and Accountability

A. Award Notification and Funding Period

6. Q—How will LEA grantees receive notification of funding?

A—After final approval by the CDE, a list of funded grantees is posted on the CDE Funding and Fiscal Management Web page at <http://www.cde.ca.gov/ls/ba/as/fiscal.asp>. Grantees will receive a Grant Award Notification (AO-400), which is the formal notification of the award indicating the amount of funds allocated annually.

The *EC* requires that the AO-400 be signed by the Authorized signatory and returned to the CDE before receiving the first 25 percent installment of the grant award.

7. Q—What is the duration of the ASSETs grant funding?

A—The grant period for ASSETs grant funding is five years (*EC* Section 8426[a]).

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B. Reporting Requirements and Due Dates

8. Q—Where can grantees obtain information about reporting deadlines?

A—All mandated attendance, fiscal, and evaluation report submission deadlines are posted on the CDE Reporting Due Dates Web page at <http://www.cde.ca.gov/ls/ba/as/duedates.asp>.

9. Q—What types of reports are grantees required to submit to the CDE?

A—The *EC* requires that all grantees must submit to the CDE an annual budget, two [semi-annual attendance reports](#), four [quarterly expenditure reports](#) (*EC* Section 8421[f][8][B]) and the Annual Outcome-based Data for Evaluation.

C. Late-Arrival and Early-Release Policy

10. Q—Is a Late-Arrival or an Early-Release Policy required for ASSETs Programs?

A—No. The statute does not explicitly state the requirement for an Early-Release or Late-Arrival policy.

D. Sign-in/Sign-out Procedures

11. Q—Are sign-in/sign-out procedures required in ASSETs Programs?

A—Yes. Student safety and state attendance reporting requires that all grantees have sign-in/sign-out procedures. All grantees should develop an accounting system to track student attendance. Sign-in/sign-out procedures should ensure adequate safeguards and a level of integrity acceptable to an auditor or during a Federal Program Monitoring (FPM) visit.

Promising Practices—Findings from program audits suggest formatting sign-in sheets with numbered lines for each student to write on to avoid having more than one name on the same line. Concern for student safety suggests that columns for the time the student left the program should be part of the procedure, and entered on the sign-out sheets.

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12. Q—Can we adopt electronic sign-in/sign-out procedures for students attending our after school program?

A—Electronic sign-in/sign-out systems are not prohibited. Each student attending an after school program must be closely monitored for safety, compliance, and accountability reasons. Whether using a manual (i.e., paper copies) or an electronic system, the accountability of students attending the after school programs require a precise and rigorous method that ensures the safety of the students and accurate attendance reporting to the CDE.

Promising Practices—According to promising practices, sign-in/sign-out systems should do the following:

- Record and track all sign in/out entries by student name, unique identifier, date, and time
- Identify, record, and track all entries or alterations made by the program staff
- Generate reports that identify input errors or inconsistencies
- Identify and record absences
- Require the reasons for late-arrival or early-release from the program
- Back up information on a daily basis and maintain the data for at least five years
- Prevent alterations of historical data

To ensure the reliability of the system, the use of parallel systems (manual and electronic) during the first year of an electronic system implementation is recommended. Checking one system against the other ensures that the electronic system is operating as intended. In addition, control features should exist to prevent the system from being turned off.

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If grant funds are to be used for the purchase of such a system, the purchase will have to be approved in advance by the CDE.

E. Programs Conducted Off-site

13. Q—Can an ASSETs grantee operate a program in a location other than the school site?

A—Yes. *EC* states that ASSETs Programs may operate on a school site or on another site as approved by the CDE in the grant application process. A site that is not located on school premises must be at least as available and accessible as similar programs conducted on school sites and must ensure safe transportation for the students enrolled in the program. Programs operating off site must comply with all program requirements (*EC* Section 8421[e][1]).

Promising Practices—Safe transportation includes walking short distances, providing school buses, or other modes of transportation.

F. Weekend Activities and Expenditures

14. Q—Can ASSETs funding be used for activities on the weekend?

A—Yes. The *EC* provides high school programs the option of operating after school only or after school and during any combination of before school, weekends, summer, intersession, and vacation. Thus, ASSETs Programs can operate and report attendance during any part of the year, as long as they are meeting all program requirements (*EC* Section 8422[d]).

G. Credit Recovery

15. Q—Can grantees use ASSETs funds to offer programs or activities for which participants may receive credit toward high school graduation requirements?

A—Yes. The *EC* allows grantees to utilize ASSETs program funds to implement programs or activities in which students receive credit toward high school graduation. All activities or programs implemented must be in alignment with the district policies of the LEA for credit recovery.

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H. Attendance Requirements

16. Q—How do I submit an attendance report in the After School Support and Information System (ASSIST) to CDE?

A—The grantee submits two semi-annual attendance reports to CDE through the ASSIST database. To view your grant’s required attendance report(s), log onto ASSIST; click the appropriate grant ID link. All required reports will be displayed under the Reports Due tab. All reports listed under Reports Due must be completed and submitted to ensure good standing and timely release of payments from the CDE. Once the attendance report is submitted to the CDE, past reports are displayed under the Report History tab for your historical reference. Attendance is calculated by adding the number of students in attendance every day of programming for the outlined reporting period. For more information about ASSIST, please refer to [Reporting Accountability under Fiscal Requirements](#) on page 13.

17. Q—I made a mistake on my attendance report. How can I fix it?

A—Once a report is submitted electronically to the CDE, it can only be edited by CDE Expanded Learning Division (EXLD) staff. To request an edit to an ASSIST report, please contact your assigned regional analyst. A list of analysts and consultants can be found on the CDE’s System of Support for Expanded Learning Contacts Web page at <http://www.cde.ca.gov/ls/ba/cp/regntwrkcontacts.asp>.

18. Q—Does the ASSETs Program require a minimum level of program attendance?

A—Yes. The *EC* requires that an ASSETs Program must meet a minimum of 75 percent of their attendance goal every year; and must reach at least 85 percent of their attendance goal in the past two consecutive calendar years (*EC* Section 8426[d]).

It is important to note that attendance is calculated by calendar year (January–December), not fiscal year (July–June). As illustrated in the graphic below, program sites will take the attendance from the second half of one school year and combine that with the attendance from the first half of the next school year to get the total number of students served in one calendar year.

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21. Q—Why is attendance so important for before and after school programs?

A—The purpose of before and after school programs are to support student success in school by providing academic support and enrichment opportunities. The legislature determined that regular attendance in the after school program would serve as the best measure of program success.

I. Operational Requirements

22. Q—How many hours per week are required to operate an ASSETs Program?

A—The *EC* requires the ASSETs Programs must operate for a minimum of 15 hours per week. High school programs have the option of operating after school only or after school and during any combination of before school, weekends, summer, intersession, and vacation (*EC* sections 8421[c] and 8422[d]).

23. Q—Are ASSETs Programs permitted to close at any time during the school year?

A—Yes. The *EC* for High Schools is that they operate for a minimum for 15 hours a week. High school programs have the option of operating after school only or after school and during any combination of before school, weekends, summer, intersession, and vacation (*EC* sections 8421[c] and 8422[d]). When the program is not in operation programs may use the time for professional development days.

Promising Practices—It is a Promising Practice to notify parents and families of the planned professional development days in advance to allow ample time for them to make alternative arrangements for their child/children for the after school hours on these designated days. All professional development training must be included in the program plan and listed on an annual calendar.

There is no accommodation made for the professional development days and subsequent lost attendance. Programs not meeting attendance requirements should consider this as it will affect grant reductions.

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24. Q—Can an ASSETs Program get credit for attendance when the program is forced to close due to a natural disaster, civil unrest, or imminent danger to pupils or staff?

A—The *EC* allows programs to temporarily close due to a natural disaster, civil unrest, or imminent danger to pupils or staff. In order to receive attendance credit for closure due to these circumstances, grantees are required to submit an Attendance Relief Request Form to the EXLD with evidence that justifies the closure of the program. Upon acceptance of that evidence and approval by the EXLD, the EXLD will apply the program’s annual average daily attendance to the days the program was closed.

As noted above, to get attendance credit, programs must complete and submit EXLD’s Attendance Relief Request Form and provide one or more of the following as evidence:

- Request for Allowance of Attendance (form J-13A)
- School or district Web site announcement
- Copy of board minutes, citing the closure
- Newspaper articles mentioning the natural disaster and its effect on the community
- Letter to parents or letter certifying closure signed by the superintendent or principal

Programs that fail to submit the required documentation by January 31 for closures during the previous calendar year will not be given attendance credit.

J. Good Standing

25. Q—What is required for an ASSETs Program to be in “good standing?”

A—Good Standing Status is defined as:

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- All attendance reports for grantees have been submitted prior to the reporting deadline and have been found by the EXLD to be complete.
- All expenditure reports for grantees have been submitted prior to the reporting deadline and have been found by the EXLD to be complete.
- All annual outcome-based data for grantees has been submitted prior to the reporting deadline and have been found by the EXLD to be complete.
- All annual audit findings for grantees have been found by the EXLD to be resolved or are in the process of being resolved to the satisfaction of the CDE.
- All FPM findings for grantees have been found by the EXLD to be resolved or are in the process of being resolved to the satisfaction of the CDE.

III. Grant Modifications

A. Grant Reductions

26. Q—If a grantee has failed to meet its annual attendance target, will the CDE reduce funding?

A—Yes. While ASSETs Program sites should strive to meet 100 percent of its attendance target, programs are reduced under the following conditions:

- a. An ASSETs Program fails to achieve 75 percent of their annual attendance target in any given calendar year after the first year of receiving the grant
- b. An ASSETs Program fails to achieve 85 percent of their annual attendance target in the past two consecutive calendar years, after the first year of receiving the grant

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27. Q—When will reductions to ASSETs grant awards become effective?

A—Reductions to grant awards are identified by May and become effective in the next fiscal grant year (July 1). The Grant Award Notification(s) (AO-400s) will reflect the reduced award amount.

28. Q—If a grantee has a school site that is not meeting its annual attendance target, can a grantee voluntarily reduce the funding to the level of students being served at the site?

A—Yes. The *EC* allows a grantee to voluntarily lower its annual grant amount if one or more sites are unable to meet the proposed pupil attendance levels for the previous calendar year(s). The CDE allows for an extra 5 percent grant cushion as an incentive to sites that voluntarily reduce their grant award. While involuntary grant reductions are given a 10 percent cushion above their actual attendance, a voluntary grant reduction is given a 15 percent cushion above actual attendance. The voluntary reduction form is due to the EXLD at the beginning of each calendar year.

29. Q—What method does the CDE use to determine an involuntary grant reduction?

A—For new program sites, the first six months of attendance are not evaluated. Otherwise, attendance is analyzed by calendar year on an annual basis. The two most recent full calendar years will be measured for the following: the most recent calendar year data must meet a minimum of 75 percent of its attendance target; and the most recent two calendar years must meet a minimum of 85 percent. If the percentage falls below 75 percent in the most recent fiscal year, the CDE will adjust the grant to meet the actual attendance level plus a 10 percent cushion. If the percentage falls below 85 percent for two consecutive years, the CDE will use the best of the two year's actual attendance plus a 10 percent cushion.

30. Q—Due to special circumstances, our site did not operate an after school program this year. Can we use the funds next year?

A—No. Carryover of funds for ASSETs Programs is not allowed. A program submitting zero attendance for one full fiscal year will be billed

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back for that funding at the end of the year after the first year of the grant. Reporting zero attendance can result in a grant reduction or termination.

B. Transferring Funds Between Sites

31.Q—Can a grantee share grant funds with other school sites in its grant?

A—Yes. A grantee may allocate, with CDE’s approval, up to 125 percent of the maximum total grant amount for an individual school, as long as the maximum total grant amount for all school programs administered by the program grantee is not exceeded. The school receiving the additional funds must have an established waiting list for enrollment, and the funds can only be transferred from a school that has met a minimum of 70 percent of its [attendance target](#) (EC Section 8426.5). This transfer is only valid for one fiscal year.

IV. Fiscal Requirements

A. Reporting Accountability

32.Q—What is the ASSIST?

A—The ASSIST is an automated, online reporting system used to track information for the ASSETs Program. The system allows interested applicants to obtain funding information and forms, and allows authorized grantees to log into the system and maintain grant contact information, revise grant budgets, submit quarterly expenditures and semi-annual attendance reports, check payment status, history and run informational reports.

33.Q—How is the ASSIST used?

A—The ASSIST is used to apply for before school, after school and summer funds administered by the CDE. Upon funding, each authorized agent is granted secure access with the ability to create additional accounts for after school staff. Registered users can maintain grant contact information, revise grant budgets, submit quarterly expenditures and semi-annual attendance reports, as well as check payment status

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and history. Additional information about the ASSIST is posted on the CDE ASSIST Web page at <http://www.cde.ca.gov/ls/ba/at/>.

34. Q—Where can grantees obtain information to learn how to use the ASSIST?

A—The CDE has ASSIST online tutorials that provide information and technical assistance (TA) on how to use the system. This information is posted on the CDE ASSIST Web page at <http://www.cde.ca.gov/ls/ba/at/>.

Note: For TA or to request additional users, contact the EXLD by e-mail at assist@cde.ca.gov.

35. Q—I'm new to the 21st Century High School ASSETs Program. How can I get an ASSIST logon?

A—Please contact your agency's authorized signatory (Superintendent for a school district, county office of education, board authorized agent for a direct-funded charter school, or chief executive officer of a non-profit organization or a government agency) to request a secure ASSIST logon. The CDE can only assign ASSIST access to the **authorized signatory**. All subsequent accounts have to be created from the grantees' SuperUser account.

36. Q—I am an ASSIST SuperUser. How do I create an additional account for a new staff member?

A—Click the **User Maintenance** link at the top of the screen. From the User Maintenance screen, click the **Add** button to add a User. Enter a unique user name and password for your new User, along with pertinent contact information. You may designate the Role as User or SuperUser. SuperUser(s) have the ability to create logon IDs for others within the agency, as well as reset passwords for all agency account owners. Once complete, click **Save**.

37. Q—Is there a limit to the number of ASSIST accounts we can have?

A—No. ASSIST will allow you to create as many user accounts as your agency needs.

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B. Indirect Costs

38. Q—What are indirect costs?

A—Indirect costs consist of agency-wide business and administrative costs such as accounting, budgeting, payroll preparation, personnel management, purchasing, and centralized data processing. The standardized method for charging indirect costs to programs is through the indirect cost rate.

It is important that LEAs understand the difference between agency-wide general administration expenditures—indirect costs, and school site or program-level expenditures—direct costs.

39. Q—How much of the grant award amount can be expended on indirect costs?

A—The *EC* states that an ASSETs grantee may expend no more than the [CDE-approved indirect cost rate](#) or five percent, whichever is less (*EC* Section 8426[c][1][B]).

C. Administrative Costs

40. Q—What are administrative costs?

A—Costs related to administration can include both direct program charges (salary costs related to preparing program plans, developing budgets, and monitoring activities, travel costs for program activities, rental or purchase of program-specific office equipment or supplies, rental, and maintenance of program office space) and indirect charges for general administration of the program (personnel, payroll, accounting, procurement, or data processing). Any cost, direct or indirect, that supports management of the program is considered administrative in nature.

41. Q—How much of the grant award amount can be expended on administrative costs?

A—An ASSETs grantee may expend no more than 15 percent of the grant funding on administrative costs. Administrative costs include indirect costs as described in the above response (*EC* Section

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8426[c][1]). If the grantee subcontracts out to another provider, the combined administrative and indirect cost for the grantee and the subcontractor cannot exceed 15 percent.

D. Direct Service Costs

42. Q—What are direct service costs?

A—These are costs for staff and services that provide a measurable, direct benefit at the program site (*EC* Section 8426[c][1]). Examples of direct costs easily identified with particular programs are staff salaries, bus driver salaries, and supplies.

43. Q—How much of the grant award amount must be expended on direct services to students?

A—The *EC* requires that an ASSETs grantee must spend at least 85 percent of the grant funding on direct services to students (*EC* Section 8426[c][1]).

44. Q—Is the cost of the Site Supervisor considered a direct service?

A—Compensation paid to a Site Supervisor may be allocated as a direct service cost only to the extent the Site Supervisor's duties are to provide direct services. Generally speaking, if the Site Supervisor spends only 50 percent of his or her time providing direct services, then no more than 50 percent of his or her compensation is allowable as a direct service cost.

E. Allowable Costs

45. Q—What are the allowable costs for after school programs?

A—Federal Office of Management and Budget (OMB) Uniform Guidance discusses general principles for determining allowable costs and in subsection C discusses basic guideline factors affecting allowance of costs. It states, in part, to be allowable under federal awards, costs must meet the following general criteria:

- a. Funds are used in compliance with all applicable Federal statutory and regulatory provisions

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- b. Costs are reasonable and necessary for operating these programs
- c. The performance of the award as related to the use of funds will be clearly documented according to performance goals agreed to by the Federal agencies providing the funds
- d. Funds are not used for general expenses required to carry out other responsibilities of the non-federal entity or its sub-recipients that are not directly or indirectly related to performance on the award

There are circumstances, where it is not immediately clear whether a cost is allowable. In those situations, the CDE EXLD interprets allowable costs to mean that as long as the grantee and/or the contractors are able to document and demonstrate that a particular activity cost is part of a lesson plan or program plan that has specifically stated educational objectives, it can be allowed. However, allowable costs are for the auditor to review the evidence provided and use his/her professional judgment to determine if the cost is necessary, reasonable, and adequately documented for the particular event.

F. Supplement vs. Supplant

46.Q—What are the grant requirements about supplanting?

A—Grant funds must supplement, **not supplant**, existing services. Programs are prohibited from using ASSETs funds to pay for existing levels of service. A grantee may not stop or reduce another after school program and supplant it with the federally supported ASSETs funds (*EC* Section 8426[g]).

47.Q—What is supplanting?

A—This term means **"to take the place of."** For example, if a particular activity last year was paid for with general funds, the same activity this year cannot be paid for with ASSETs funds or it will be considered supplanting.

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48. Q—What is supplementing?

A—This term is defined as “**to add to.**” For example, an agency may increase its existing locally funded after school program enrollment by using new ASSETs federal funds to increase the number of students in the program.

49. Q—What is the difference between Supplementing vs. Supplanting?

A—A grantee using ASSETs funds to increase the student population being served will be supplementing, such as adding a new class or a new site to accommodate additional students. However, if the ASSETs funds were used to replace a program which was initially funded with other funds, it is considered supplanting and prohibited by law.

Any item, including equipment purchased with ASSETs funds may only be used for a before, after school and summer program. Use of this equipment for the regular day school would be considered supplanting. Any services purchased with ASSETs funds may only be used for before and after school programs to avoid supplanting.

Promising Practice—If an item is purchased with the intent to be used by the after school program and the instructional day, the program can create a cost-share agreement where both parties are able to utilize the item and are held fiscally responsible. For example, the instructional day would pay for two-thirds of the item because they are using an average of six hours a day, and the after school program would pay for one-third of the item because they are using it three hours per day.

G. Fiscal Agent

50. Q—What is a Fiscal Agent and who may serve as a Fiscal Agent for an ASSETs Program?

A—The Fiscal Agent is the grantee partner that receives the funds for an ASSETs grant operated by a consortium or partnership. The Fiscal Agent ensures that accurate, current, and complete financial and operational records are kept, and that the program will follow all reporting and auditing standards required by the CDE. Any entity eligible to receive an ASSETs grant may serve as the Fiscal Agent.

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H. Separation from a Consortium

51. Q—Can an ASSETs grantee separate from a consortium (two or more agencies jointly acting as a fiscal agent at the time of the grant application)?

A—An ASSETs grantee may relinquish responsibility for a grant to another partner listed on the original grant application in a consortium with the review and approval of the CDE. Such changes are approved on a case by case basis.

I. Expenditure Reports

52. Q— What are the expenditure reporting requirements?

A—All ASSETs grantees must submit accurate and timely quarterly expenditure reports to the CDE through the ASSIST online reporting system. The law authorizes the CDE to withhold grant award payments for the failure to comply with the reporting requirements.

The law requires that the ASSETs grantees submit four quarterly expenditure reports. Programs may not carry over funds from year to year. All funds must be obligated by June 30 and liquidated by September 30. Grantees may submit a close out expenditure report by September 30. The ASSETs Quarterly Expenditure Report Instructions and Quarterly Expenditure Report (template) are posted on the CDE Web page at <http://www.cde.ca.gov/ls/ba/cp/cclcfirms.asp>.

53. Q—How do I submit a grant expenditure report?

A—After a budget is submitted into ASSIST and approved by the CDE EXLD, grant expenditures are reported in ASSIST. Once the grantee has submitted the quarterly expenditures, all required expenditure reports are automatically generated in ASSIST one day after the end of the [quarterly reporting period](#). To view your grant's required expenditure report(s), log onto ASSIST; click the appropriate grant ID link. All required reports will be displayed under the Reports Due tab. All reports listed under Reports Due must be submitted to ensure good standing and timely payments. Once a report is submitted to the CDE, they will be displayed under the Report History tab for your historical reference. For further assistance, grantees should contact their assigned CDE EXLD

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Regional Fiscal Analyst. The list of the CDE EXLD Fiscal Analysts and the region(s) to which they are assigned, is posted on the CDE Regional Technical Assistance Contacts Web page at <http://www.cde.ca.gov/ls/ba/cp/regntwrkcontacts.asp>.

54. Q—When are expenditure reports due?

A—Expenditure reports are required every October, January, April, and July. For more details, please see the CDE Reporting Due Dates Web page at <http://www.cde.ca.gov/ls/ba/as/duedates.asp>.

55. Q—What happens if a grantee does not expend all grant funds, or expends less than actually disbursed?

A—The CDE requires that a grantee return all unexpended funds. Grant payments will be made up to the lesser of the grant award or the expenditures to date. No carryover of ASSETs funds is allowed. During the year-end closeout process, the CDE EXLD will determine if an overpayment has been made and will invoice the grantee accordingly.

56. Q—What if changes need to be made after submitting an expenditure report?

A—Grantees should contact their assigned Regional Fiscal Analyst for all ASSIST revisions. For help locating your assigned CDE staff, see the CDE Regional Technical Assistance Contacts Web page at <http://www.cde.ca.gov/ls/ba/cp/regntwrkcontacts.asp>.

57. Q—Where can grantees obtain additional information about expenditure reports?

A—Detailed instructions for submitting expenditure reports are provided in the ASSIST tutorials posted on the CDE ASSIST Web page at <http://www.cde.ca.gov/ls/ba/at/>.

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V. Program Requirements

A. Program Plan

58. Q—What are the requirements for ASSETs grantees to have a program plan?

A—For ASSETs funding, the program plan is submitted as part of the application process, is reviewed and rated as part of a competitive funding process, and remains the program plan for the duration of the grant. The program plan may be altered only with prior approval from the CDE.

59. Q—Who may participate in an ASSETs Program?

A—ASSETs Programs shall serve pupils in grades nine through twelve, inclusive. Priority enrollment for the after school program goes to the students of the site funded that received the grant (*EC* Section 8421[a]).

60. Q—Can expanded learning programs claim participant attendance for in-season California Interscholastic Federation (CIF) sports?

A—No. By definition, CIF sanctioned sports have try-outs and cuts and therefore, are not inclusionary and open to all students to participate.

61. Q—Can expanded learning programs spend funds for (i.e., staffing, transportation, materials, etc.) in-season California Interscholastic Federation (CIF) sports?

A—No. Applying funds in any way towards in-season CIF related sports is considered supplanting. Additionally, there are strict compliance rules impacting off-season CIF sports that should be considered, for detailed information go to CIF Web site at <http://www.cifstate.org/landing/index>.

62. Can ASSETs funds be used to support cheerleading?

A—Yes. ASSETs funds may be used to support cheerleading activities, as long as it complies with ASSETs *EC* compliance for inclusion and supplementing, not supplanting (*EC* Section 8426[g][1]), and is also in line with CIF compliance rules, however, be advised on July 1, 2017, cheerleading will become a CIF sport and governed accordingly. In addition to checking with CIF rules, check with your local district Athletic

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Coordinator to be sure your district does not have more restrictive rules than CIF.

63. Does Assembly Bill (AB) 949 elevate cheerleading to a sanctioned CIF sport effective July 1, 2017?

A—Yes. Per the passing of AB 949 (June 1, 2015), known as the California High Schools Expanding Equality Respect and Safety Act, or CHEERS Act, requires the CDE to develop guidelines, procedures, and safety standards with the CIF for high school cheerleading in the collaborative manner with which it has developed these guidelines for other CIF sports. AB 949 elevates and will regulate cheerleading as a CIF sport effective July 1, 2017 and as such cheerleading is in the process of being added as a CIF sport. Effective 2017–18, cheerleading will follow all of the same policies and regulations as all other interscholastic athletic sport teams. In addition to checking with CIF rules, check with your local district Athletic Coordinator to be sure your district does not have more restrictive rules than CIF.

B. Staff Qualifications

64. Q—Is there a minimum qualification for the expanded learning staff who directly supervise students?

A—No. The statute does not explicitly state the requirement for staff supervising high school students.

65. Q—Do ASSETs Program sites need to maintain a staffing ratio?

A—No. The 20:1 student-to-staff ratio applied to other CDE-administered expanded learning programs does not apply to ASSETs Programs. However, it is an expectation to have a reasonable student to staff ratio that supports students' safety and provides the highest quality programming possible.

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C. Licensing Requirements

66. Q—Do before and after school programs have to be licensed?

A—No. State and federally funded expanded learning programs are exempt from licensing requirements.

D. Health Screening and Fingerprint Clearance

67. Q—Is there a requirement regarding health screening and fingerprint clearance for the expanded learning staff?

A— No. The statute does not explicitly state the requirement regarding fingerprinting clearance for staff supervising high school students. However, programs should refer to existing LEA policies for local requirements on this matter.

E. Site Supervisors

68. Q—Do school site principals approve the selection of Site Supervisors?

A—No. The statute does not explicitly require site principals approve the selection of site supervisors.

F. Records Retention

69. Q—How long does an ASSETs Program have to keep its records?

A—The *EC* requires grantees to maintain documentation (electronic or hard copy) of the after school program plan for a minimum of five years. The CDE shall review the program plan and historical documentation during site visits (*EC* sections 8482.3[g][1][F] and [2]). Grantees are also responsible for maintaining records for all of their subcontracted providers.

Promising Practices—The ASSETs Program grantees are recommended to maintain attendance, expenditure, and evaluation reports, along with supporting documentation, for a minimum of five years, and the department shall monitor this review as part of its onsite monitoring process.

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G. Disposal of Equipment

70. Q—What are the rules for disposing of equipment purchased with 21st Century High School funds?

A—If an ASSETs program closes or if the equipment purchased with federal funds is no longer needed for the original ASSETs project, then according to the U.S. Education Department General Administrative Regulations (EDGAR), the equipment may be used by other school sites under the grantee’s authority in the following manner (depending upon the type of grantee):

- **LEA:** When no longer needed for the original program, the equipment may be used for other activities currently or previously supported by **any** federal agency cited in the Code of Federal Regulations (CFR) (34 CFR 80.32[c]).
- **Non-profits or Institute of Higher Learning (IHL):** The equipment must be used in connection with other federally sponsored activities in the following order (34 CFR 74.34[c]):
 - United States Department of Education (ED) sponsored programs (e.g., Title I)
 - Non-ED sponsored federal programs

Regardless of the institution type, because of allocation requirements, the receiving federal program using the equipment may have to track their share of the cost depending on the amount of time the program uses the equipment.

71. Q—What are the rules for disposing of equipment purchased with 21st Century funds, if there are no other federally funded programs run by grantee?

A—If there aren’t any other federally funded programs run by the grantee, the following EDGAR disposition rules must be followed:

- **LEA:** When the equipment is no longer needed for the original program or for other activities currently or previously supported by a federal agency, disposition will be as follows:

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1. Equipment with a current per unit fair market value **over \$5,000** may be retained or sold and the ED must receive an amount calculated by multiplying the current market value or proceeds from the sale by ED's share of the equipment (34 CFR 80.32[e][2]).
 2. Equipment with a current per unit fair market value of **less than \$5,000** may be retained, sold or otherwise disposed of with no further obligation to ED. However, we recommend maintaining records describing the equipment's disposition and use after disposition (34 CFR 80.32[e][1]).
- **Non-profits or IHL:** When the equipment is no longer needed for the original program or for other activities currently or previously supported by a federal agency, disposition should be as follows:
 1. For equipment with a current per unit fair market value **over \$5,000**, the recipient may retain equipment for other uses provided that compensation is made to the ED. Thus, the nonprofit or IHL may use the equipment for non-federal programs assuming the ED receives the appropriate compensation (34 CFR 74.34[g][1]). If the nonprofit or IHL no longer needs the equipment at all, it must request disposition instructions from the ED (34 CFR 74.34[g][2]).
 2. The EDGAR does not specifically address disposal for equipment with a current fair market value **under \$5,000**, therefore it is reasonable to assume that there is no obligation to the ED if the equipment is valued at less than \$5,000; however good practice is to maintain documentation of disposition and how the equipment is used after disposition.

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H. Evaluation Data

72. Q—What are the evaluation requirements for ASSETs Programs, and what portion of a grant award can be budgeted to collect data for evaluation and reporting?

A—There are several data submission requirements for expanded learning programs. The ASSETs grantees may budget up to the greater of six percent of its grant award, or \$7,500 to collect outcome data for evaluation and reports to the CDE. (*EC Section 8426[g][2]*).

Annual Performance Report

All ASSETs grantees are required to provide information to the ASSETs Data Collection annually. The information is requested by the ED to respond to congressional, U.S. Office of Management and Budget, and other ED inquiries about the program.

The Tactile Group manages the data collection process for the ED. If additional support is needed, they can be contacted by e-mail at 21apr@thetactilegroup.com or by phone at 1-888-282-4589.

I. Annual Outcome-Based Data for Evaluation

73. Q—What does the CDE consider to be Annual Outcome-Based Data for Evaluation?

A—Annual Outcome-Based Data for Evaluation are: (a) student-level school day attendance on an annual basis and program attendance on a semiannual basis and (b) data-driven program CQI process. Additional measures may be developed and required by CDE (*EC Section 8427[a]*).

Due dates and other information about the statewide evaluation process can be found on the CDE Annual Outcome-Based Data for Evaluation Web page at <http://www.cde.ca.gov/ls/ba/as/evaluation.asp>.

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J. Continuous Quality Improvement

74. Q—Are ASSETs Programs required to engage in CQI?

A—Yes. The *EC* requires ASSETs Programs submit evidence of a data-driven program quality improvement process that is based on the Quality Standards for Expanded Learning. The CDE provides guidance on the process and reporting requirements (*EC* Section 8427[a]). For additional information, please visit the CDE Guidance for a Quality Improvement Process Web page at <http://www.cde.ca.gov/ls/ba/as/implementatation.asp>.

K. Circumstances for Payment Withhold or Grant Termination

75. Q—What are the circumstances that would cause the CDE to withhold grant payments or terminate a grant for non-compliance?

A—The CDE will withhold the grant payment for a grant if the fiscal or attendance reporting remains outstanding, or if the grantee does not comply with audit resolutions, payment will be withheld until the reports have been filed with the CDE (*EC* Section 8426 [i]).

The CDE may terminate the grant of any site that does not comply with the fiscal/expenditures reporting, attendance reporting, audit resolutions, or annual outcome-based data for evaluations reporting (*EC* Section 8426 [i]).

L. Eligibility Requirements for Students

76. Q—Are ASSETs Programs required to provide services to students with special needs?

A—Yes. State and federal law requires that students with disabilities cannot be denied access to federally funded programs. However, LEAs should consult with their legal departments on the interpretation of state and federal law and the requirements for accommodation at the district and site level (Americans with Disabilities Act [ADA] and *EC* Section 504, *EC* sections 200, 220, 8482.6, and 11135[a]).

Promising Practices—The CDE suggests the following components to create a robust program to provide for students with special needs:

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- Have a dedicated administrator to manage the expanded learning program
- No automatic enrollment—all students with special needs have a waiting period to identify the child’s needs in order to plan for the support to be provided
- Indicate on the application that the student needs extra support
- Identify accommodations to determine if a program should delay enrollment to train staff, make modifications, or work with parents to get regional assistance

M. Transportation

77. Q—Can ASSETs funding be used to pay for busing students?

A—Yes. The *EC* considers transportation an allowable expenditure. In addition, all ASSETs grantees that received an optional Equitable Access grant, and identified student transportation in that plan, may use these funds to pay for transportation costs (*EC* Section 8484.6[a]).

N. Nutrition Issues

78. Q—Are grantees required to provide snacks for students in the after school program?

A—Yes. The *EC* requires that every after school program provide a daily nutritious snack or a supper to all program participants (*EC* Section 8423[c][3]).

79. Q—Are there resources to help after school programs provide healthy snacks?

A—Yes. A variety of resources are listed on the CDE After School Reimbursable Meal and Snack Programs Web page at <http://www.cde.ca.gov/ls/nu/as/>. These resources include information on federal reimbursable snack programs and a calculator to determine if the individual snacks provided meet the nutritional requirements.

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80. Q—Can an after school program administer medication to students?

A—The CDE EXLD does not have a standard for administering medication in after school programs. Such practices are a local decision.

Resources:

- [Administration of Epinephrine Auto-Injectors](#)
- [Medication Administration Assistance](#)
- [Medication Administration](#)

VI. Federal Program Monitoring and Audit

A. Federal Program Monitoring

81. Q—What is FPM?

A—State and federal laws require the CDE to monitor the implementation of programs. The FPM Program is one of the processes the CDE uses to ensure that grantees are fulfilling their responsibility for operating programs that meet statutory requirements (*EC* Section 8421[f][8][B]). Detailed information about the FPM process is posted on the CDE Federal Program Monitoring Web page at <http://www.cde.ca.gov/ta/cr/>.

82. Q—In case of an audit or FPM, what documentation is the grantee required to present?

A—The *EC* requires grantees to follow all fiscal reporting and auditing standards established by the department (*EC* Section 8421[f][8][B]).
Promising Practice—Have the following documents ready and made available to the auditor and/or the reviewer during an audit or FPM, including, but not limited to:

- Program Plan
- Students' sign in/out records
- Staff personnel records

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- Inventory of purchased individual items that cost over \$500
- Expenditure reports
- Memorandum of Understanding with subcontractors and program sites
- Evidence of Continuous Quality Improvement

For more information, refer to the Before and After School Federal Program Monitoring instrument located on the CDE Compliance Monitoring, Program Instruments Web page at <http://www.cde.ca.gov/ta/cr/>.

B. Audit

83. Q—What are the audit requirements for ASSETs Programs?

A—The grantee is required to maintain auditable records, which must be made available, upon request, to representatives of the CDE, other governmental agencies and auditors for monitoring, reviews, and audits. Documentation such as the Program Plan shall be kept for a minimum of five years. In cases where audit findings by a state agency remain unresolved, all records must be maintained until the audit is resolved (*EC* sections 8482.3[f][5], 41020[b][4]), and 8482.3[g][1][F]).

84. Q—What happens if there are audit findings?

A—The grantee has the opportunity to address each finding and the recommendation(s) made by the CDE EXLD Auditor. If the grantee is in agreement with the finding, the response normally identifies what corrective action will be taken to ensure the conditions of the finding are not continued in the future.

The grantee's independent auditor will submit the audit report to the CDE. The CDE EXLD Regional Consultant or Fiscal Analyst will provide TA to the grantee and obtain additional documents to verify that corrective action has been implemented. This information will be utilized to resolve the audit finding.

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Note: A reduction in attendance due to an audit finding may result in grant reduction.

VII. Technical Assistance

A. System of Support for Expanded Learning (SSEL) Leads

85. Q—What type of TA is provided by the SSEL Regional Teams?

A—The SSEL Regional Teams provide field-based TA and support in each of the 11 service regions of the California County Superintendents' Educational Services Association. Each region has at least one SSEL Lead that provides TA to a county/counties within each region. This includes training and support related to accessing local, regional, and statewide resources, as well as directly supporting grantees at the site level and through regional events. The areas of focus of the SSEL Regional Teams are: (1) to provide TA to all grantees and sites to support implementation of programs that fully address all ASSETs requirements and (2) to build capacity throughout the region they serve by developing, implementing, and sustaining support for quality before and after school programs. The SSEL Regional Teams respond to questions that are related to program operational procedures and legal requirements, attendance, resources for programs, as well as professional development needs. A list of the SSEL Lead contacts is posted on the CDE Regional Technical Assistance Contacts Web page at <http://www.cde.ca.gov/ls/ba/cp/regntwrkcontacts.asp>.

B. CDE EXLD Consultants and Fiscal Analysts

86. Q—What type of questions should grantees ask the Regional Consultants working in the CDE EXLD?

A—The Regional Consultants in the EXLD provide program, administrative, and fiscal policy support to expanded learning program grantees, guidance to the grantees and LEAs on the interpretation and administration of the legal requirements and guidelines of grants, support in understanding applicable law, policy, infrastructure, state standards, and assessment and accountability systems. The list of the CDE EXLD Regional Consultants is posted on the CDE Regional

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Technical Assistance Contacts Web page at
<http://www.cde.ca.gov/ls/ba/cp/regntwrkcontacts.asp>.

87. Q—What types of questions should grantees ask the Fiscal Analysts working in the CDE EXLD?

A—The Fiscal Analysts in the EXLD provide support to grantees with budget transfers, expenditure reports, AO-400 grant awards, attendance reports, grant reductions, and the ASSIST use and corrections. The list of the CDE EXLD Fiscal Analysts and the region(s) to which they are assigned is posted on the CDE Regional Technical Assistance Contacts Web page at <http://www.cde.ca.gov/ls/ba/cp/regntwrkcontacts.asp>.

C. Other Technical Assistance

88. Q—Are there other TA resources available?

A—Yes. The CDE funds a variety of efforts to address specific after school needs. These include:

- The **California After School Network (CAN)** is funded by the CDE and helps after school program providers increase the knowledge, capacity and competency of after school programs; it also assists in the development of tools and resources to support high quality after school programs. Additionally, the CAN provides leadership and links to state policy makers, offering a collective voice to support policies, research, public awareness campaigns, and innovative strategies. Additional information and resources are posted on the CAN Web site at <http://www.afterschoolnetwork.org/>.
- The **After School Assistance Providers (ASAPconnect)** links out-of-school-time programs and assistance providers so you can partner more effectively, expand capabilities and improve program quality. After school program staff can use the ASAPconnect Directory to find relevant, up-to-date information about effective training, mentoring, coaching and consulting. Searches can be custom-tailored to your specific program improvement needs. Additional information and resources are posted on the ASAPconnect Web site at <http://asapconnect.org/>.

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93. Q—Is there a resource that can assist us in determining what kind of TA our program might need?

A—Yes. [*A Crosswalk Between The Quality Standards for Expanded Learning and Program Quality Assessment Tools \(Crosswalk\)*](#) (1.50 MB) is a report that includes a review of seven tools that assess program quality in the field at both the point-of-service level and the programmatic management level. This report centers around a matrix indicating the degree to which each tool supports assessment of the Quality Standards. This guide illuminates the overlap between currently available assessment tools and the twelve Quality Standards, as well as identified gaps in alignment. It concludes with a list of helpful resources that provide additional information on expanded learning program quality. The SSEL Leads may have other resources and tools available to help the programs in their local communities.

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