WDE 21CCLC

21^{st} Century Community Learning Center

Guidance Handbook

2026

Wyoming Department of Education

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Acknowledgments

The WDE recognizes and thanks the following 21st CCLC Program Coordinators for their valuable feedback and contributions to the drafting and refinement of this guide: Steve Hamaker, Greater Wyoming Big Brothers Big Sisters; Tamra Petersen, Uinta B.O.C.E.S. #1 Education Center; Tamera Allen, Double AAces Weston CSD #1; Tiffany Wutzke, Youth Clubs of Park County; Kathleen Gillgannon, ASK (After School for Kids) Cheyenne.

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Introduction and Grant Fundamentals

With the release of this document, the WDE aims to provide guidance on maintaining compliance with the numerous federal and state statutory and regulatory requirements of the 21st CCLC Title IV-B Grant. This Program Guide & Compliance Handbook (handbook) serves as the definitive reference for practices, standard expectations, and accountability metrics for all Wyoming 21st CCLC programs. Subgrantees must read and follow this guide in conjunction with the authorized federal statutes and applicable state regulations relevant to the 21st CCLC Grant.

Purpose of Funding

The 21st CCLC program is authorized under Title IV, Part B of the Elementary and Secondary Education Act (ESEA), as amended. The foundational goal of the 21st CCLC initiative is to establish or expand community learning centers that provide opportunities for academic enrichment, particularly for students who attend high-poverty and low-performing schools. These centers operate during non-school hours, such as after school or during the summer, and are designed to:

- Help students meet challenging state academic standards by offering high-quality, research-based academic assistance.
- Provide students with a broad array of engaging activities that complement the regular academic program and support Wyoming students becoming college, career, and military ready.
- Offer literacy and other educational services to the families of participating students, promoting family engagement in their children's education.

Wyoming Focus and Prioritization

While adhering to the federal mandate, the WDE emphasizes a state-specific focus on high-quality implementation driven by data-based decision-making. Wyoming's administration of the 21st CCLC program prioritizes accountability and impact, ensuring that federal funds are used effectively to close achievement gaps. Key requirements and priorities include:

- **Eligibility:** Programs must be established in collaboration with organizations and agencies and serve students from schools that meet the federal definition of an "Eligible School." This typically requires the school to serve a high percentage or high number of students from low-income families, often based on specific poverty metrics (e.g., Title I eligibility).
- **Targeted Service:** The primary measure of program impact in Wyoming is the success of Regular Attendees. A student is defined as a Regular Attendee if they participate in the program for 90 or more hours during the operational year. Subgrantees are required to design programs to maximize regular attendance, as data collection and performance reporting focus heavily on this cohort to demonstrate meaningful engagement and improved outcomes. This threshold ensures that students being evaluated have received enough "dosage" of the program to realistically show improvement.

Basic Program Requirements

The 21st CCLC program in Wyoming is managed through a competitive grant process. Applicants must demonstrate a strong need for out-of-school services and the capacity to deliver a safe, accessible, and well-managed program that is aligned with the academic goals of the regular school day.

Key Program Features

- **Out-of-School Time Services:** Centers must offer services for students during Out-of-School Time (after school, before school, evenings, weekends, summer, or other school vacation periods). Adult Family Engagement services may occur at any time.
- **Family Engagement:** Centers must offer adult family members of 21st CCLC students ongoing opportunities for active and meaningful engagement in their children's education, including opportunities for literacy and related educational development to enhance student learning.
- **Academic Enrichment and Tutoring:** Programs must provide opportunities for academic enrichment, including providing tutorial services to help students, particularly students who attend low-performing schools, to meet the challenging State academic standards.
- **Complementary Programming:** Program services must be designed to reinforce and complement the regular academic school day program of participating students.
- **Continuous Evaluation:** Programs must be continually evaluated to assess progress towards meeting their grant objectives in the areas of academics, youth development, and family engagement.
- **Supplement, Not Supplant:** Programs and associated funds are required to supplement or enhance any existing Out-of-School Time offerings and cannot supplant or replace other funding sources.
- **Essential Student Services:** Programs must ensure the following services are provided to participating students: a safe and supportive learning environment, transportation, nutritious afterschool snacks, and summer meals.

For comprehensive guidance and application materials, visit the official **WDE 21st CCLC Program Page**.

Fidelity to the Approved Application

The "Roadmap" Policy

The approved application and the **Program Implementation Planner (PIP)** serve as the binding contract for operations. The PIP helps subgrantees detail and track the execution of approved program goals, objectives, and activities. Fidelity to the approved application means the program must be delivered consistent with the original design; the application serves as the subgrantee's guide or roadmap and is essentially a contract.

Key Points on Grant Awards and Fidelity

- **Annual Funding:** 21st CCLC Grant Applications are approved by the WDE staff (namely the 21sCCLC Program Consultant) following a competitive peer review process. Subgrantees receive annual Grant Award Notification (GAN) letters detailing the State Board of Education-approved funding allocation for each year of the grant period (typically October 1–September 30).
- **Acceptance and Documentation:** The GAN letter, which includes the approved award amount and annual assurances, must be formally accepted and approved annually by the Subgrantee's local Board of Education or Board of Directors. This acceptance and the GAN letters must be retained for monitoring purposes.
- **No Unauthorized Changes:** WDE expects subgrantees to adhere strictly to the original approved application. Any change to the project's scope, as outlined in the application, is generally not permitted without prior, formal approval.
- **Formal Revisions Required:** If programmatic or budgetary changes are necessary, they must be submitted as a proposed revision to the application through the electronic grants management system (eGMS). This policy ensures fairness to all applicants by maintaining the integrity of the original, peer-reviewed, and awarded proposal.

- **Shared Understanding:** The approved application and the PIP should be familiar to all relevant staff, including site coordinators, staff, and school administrators. All program activities must align with the objectives and activities originally detailed in the accepted proposal.

Application Revisions Process

Procedures for submitting programmatic or budgetary changes via the eGMS can be found in the **WDE Resources tab** in the eGMS. Changes must be approved prior to implementation.

Authorized Activities

The "Menu"

Federal Allowable Activities Under ESSA Section 4205(a), 21st CCLC funds may be used to carry out a broad array of activities that advance student academic achievement and support student success. Subgrantees may select activities from the following authorized list that align with their specific **Needs Assessment Toolkit** and the **Wyoming Content and Performance Standards**.

The 15 Authorized Activities:

- **Academic Enrichment:** Remedial education activities, tutoring services, and enrichment programs aligned with state and local academic standards.
- **Well-Rounded Education:** Activities such as arts, music, and cultural education activities.
- **STEM/STEAM:** Mathematics, science, technology, and engineering education activities.
- **Literacy:** Literacy education programs, including financial literacy and agricultural/environmental literacy.
- **Mentorship Activities:** Programs designed to establish one-on-one or small-group relationships between students and caring adults to provide guidance, support, and positive role modeling.
- **Healthy Lifestyles:** Programs that support a healthy and active lifestyle, including nutritional education and regular, structured physical activity.
- **Services for English Learners:** Services for learners with limited English proficiency that emphasize language skills and academic achievement.
- **Parenting/Family Literacy:** Programs that promote parental involvement and family literacy.
- **Telecommunications:** Telecommunications and technology education programs.
- **Expanded Library Services:** Programs that provide assistance to students who have been truant, suspended, or expelled to allow the students to improve their academic achievement and recover academic credit.
- **Behavioral Programs:** Drug and violence prevention programs and counseling programs.
- **CTE & Career Readiness:** Career and technical programs, internship or preapprenticeship programs, and workforce preparation activities.
- **Postsecondary Prep:** Programs that help students prepare for postsecondary education (College Readiness).
- **Youth Development:** Activities that build character, resilience, and leadership skills.
- **Partnership Activities:** Activities that partner with in-demand fields of the local workforce or build transferable skills.

Programs are not required to implement all 15 activities. However, the program must offer a balance of Academic and Enrichment opportunities.

"The Simple 6" Accountability Framework

This section defines Wyoming's specific "Simple 6" quality standards into the program guide. These principles serve as the foundation for high-quality program design, implementation, and continuous improvement, ensuring all subgrantees meet state and federal compliance requirements while maximizing positive student outcomes. While compliance with federal statutes is mandatory, the Wyoming 21st CCLC approach to program management is grounded in a philosophy of Continuous Quality Improvement (CQI). We view the "Simple 6" principles not just as a checklist, but as a cycle of inquiry designed to build capacity.

Principle 1: Intentional Design

This principle mandates that all program activities are systematically planned and evidence-based, directly addressing the identified needs of the target population.

Activities must be designed using objective data derived from a current needs assessment (e.g., student grades, attendance, behavior referrals, school improvement goals, and engagement in asset maps with local advisory committee). All planned activities must be explicitly aligned with the overarching **Wyoming 21st CCLC Objectives**, ensuring the program is actively working toward improving academic achievement and school-day success.

In this framework, data is a "flashlight" used to reveal opportunities for growth, not a "hammer" used for punishment. This guide is written to help Program Coordinators move beyond "managing compliance" to "leading for quality."

A formally Signed Memorandum of Understanding (MOU) with the sch ool day administration is required. This MOU must explicitly define protocols for data sharing (e.g., accessing baseline and progress data on grades, attendance, and standardized test scores) to ensure program targets are genuinely addressing the academic needs of participating students.

Principle 2: Quality Staffing & Professional Development

Principle 2 focuses on recruiting, training, and retaining competent staff to create a safe, engaging, and effective learning environment.

- **Staff Ratios:** Subgrantees must maintain a maximum staff-to-youth ratio of 1:18 (one staff for every 18 school-aged youth) during all program hours to comply with state law. For prekindergarten participants, the maximum ratio is 1:12. Lower ratios are required for specific activities involving safety risks (e.g., use of tools, off-site trips) or to accommodate students with documented needs (IEP/504 plans) or those requiring focused 1-on-1 support. Considering staff-to-youth ratios is necessary to ensure student safety, facilitate meaningful interaction, and maintain program quality while pragmatically addressing the needs of students and staff based on program objectives and the needs of the youth served.
- **Professional Development (PD):** A portion of the total grant budget must be allocated specifically to PD activities. Training should be relevant and focus on three critical areas: youth development best practices, evidence-based academic strategies (e.g., literacy intervention, STEM pedagogy), and safety/emergency protocols. Documentation of staff participation is required.
- **Vetting:** Required background checks for all paid staff and regular volunteers must be conducted and documented prior to their interaction with students, in compliance with state and local district policies.

Principle 3: Continuous Improvement

This principle focuses on establishing a functional internal system for daily data management and formative data learning. Rather than waiting for end-of-year results, high-quality programs use real-time data to make immediate, evidence-based adjustments to operations. Consistent with **Wyoming Program Quality Practices**, this approach should incorporate the youth perspective to understand the actual impact and experience of the program, moving beyond mere operational metrics to ensure quality and relevance.

- **The Data Routine (Formative Reporting):** Subgrantees are required to submit Continuous Improvement Reports (CIRs) to the WDE three times a year, according to the trimester schedule (summer, fall, spring). These reports capture the operational "pulse" of the program, detailing trends in enrollment, attendance rates, activity sign-ups, and initial outcome data. This routine ensures that data management is an ongoing habit, allowing for the proactive identification of areas needing modification.
- **Internal Monitoring (Monthly "Pulse Check"):** To operationalize formative learning, it is a requirement for Site Coordinators to dedicate 30 minutes monthly to formally review program data with program staff. This dedicated time is not for complex analysis, but for immediate tactical adjustments; analyzing enrollment stability, identifying low-participation activities, and refining scheduling or outreach efforts based on what the data shows right now.

Principle 4: Evaluation

While Continuous Improvement (Principle 3) focuses on daily data management, Evaluation (Principle 4) focuses on the periodic, deep-dive assessment of the program's long-term impact and fidelity to its design.

To support this, the WDE has partnered with the Utah Education Policy Center (UEPC) and the Wyoming Enrichment Network (WyEN) to provide a structured Evaluation Guide (forthcoming) and specific tools for this process.

- **Periodic Local Evaluation:** Subgrantees are required to conduct a Periodic Local Evaluation that assesses program data and implementation fidelity. This process is locally-driven to ensure feasibility within the unique operational context of rural programs. It must be conducted by qualified internal staff or a contracted evaluator if resources allow.

The Continuous Improvement Cycle Framework

- Evaluation in Wyoming is grounded in a four-stage cycle, which moves beyond simple compliance to intentional design:
  - **Engage:** Conduct needs assessments and discuss available resources with stakeholders to conceptualize the program vision.
  - **Design:** Develop specific program services based on identified needs and the program's Logic Model. Identify outcomes and the specific data required to measure them.
  - **Implement:** Deliver services while actively collecting data on program fidelity and student outcomes.
  - **Adjust:** Analyze collected data to make timely, evidence-based adjustments to services.
- **Statewide Community of Practice:** To support this evaluation work, grantees will regularly participate in facilitated statewide learning communities. These sessions provide a space to share evaluation approaches, discuss findings, and receive technical assistance from WDE, consultants, and peers.
- **The Annual Local Evaluation Report:** By June 30 of each year, the grantee must submit a **Evaluation Report**. This report is the capstone of the periodic evaluation activities and must contain the following core components:

- Analyze data from all three reporting tracks (Federal, State, and Local/Quality).
- Explicitly analyze and report on the program's progress toward the specific objectives in Goals 1, 2, and 3 (Academic Support, Youth Development, and Family Engagement).
- Detail key findings on student progress, implementation fidelity, and family engagement.
- Provide clear, actionable recommendations for the subsequent grant year based on the data analysis.

- **The Local Evaluation Report's findings must be publicly accessible:** The statute (ESEA §4205(b)(2)) specifically mandates this availability, such as by posting it on the program's website, presenting it at a school board meeting, or having it ready for viewing in the main office upon request.

Principle 5: Family & Community Engagement

Principle 5 emphasizes building meaningful connections with families and leveraging community assets to support student success. Each grantee must maintain at least one active Memorandum of Understanding (MOU) with an external community organization—such as a non-profit service provider, local business, higher education institution, or public library. This partnership must result in a concrete service or resource that directly benefits program participants

- **Engagement Goal:** A minimum of 30% of the program's regular attendee goal of family members shall participate in literacy or educational development opportunities provided by the 21st CCLC program throughout the year. This goal emphasizes purposeful family involvement linked to academic and personal growth, rather than just social events.

Advisory Council Governance

To ensure the program remains responsive to community needs and maintains a focus on sustainability, every 21st CCLC grantee is required to convene an active Advisory Council.

- **Purpose:** The Advisory Council serves as the primary governance body for community collaboration. Its role is not just symbolic; members must be actively engaged in reviewing program data, advising on family engagement strategies, and serving as "champions" for the program's sustainability.
- **Composition:** The council must represent a diverse cross-section of the community. At a minimum, membership should include:
  - 21st CCLC Staff: Program Director or Site Coordinator.
  - School Representation: Administrators (Principal/Superintendent) or regular school day teachers.
  - Beneficiaries: Students and Parents/Family members.
  - Community Partners: Representatives from partner organizations (e.g., non-profits, local businesses, law enforcement, or higher education).

Meeting Frequency & Documentation

- **Frequency:** The Advisory Council must meet at least twice per year, though quarterly meetings are recommended to drive continuous improvement.
- **Documentation:** To demonstrate compliance during monitoring, the grantee must retain:
  - **Agendas:** Showing focused discussion on program goals, data, or sustainability.
  - **Sign-In Sheets:** Verifying attendance of the required stakeholder groups.
  - **Minutes:** Briefly summarizing decisions made or feedback received.

Sustainability Focus

A key standing agenda item for the Advisory Council must be sustainability. The council should actively identify potential future funding sources and partnerships to support the community learning center after the grant period ends.

Principle 6: Compliance with Purpose

Compliance is not a passive state; it is the result of active, knowledgeable leadership. This principle defines the role of the 21st CCLC Project Coordinator as the local "Guardian of Purpose," responsible for ensuring the program remains true to its federal mandate and local design.

The Role of the 21st CCLC Project Coordinator

To fulfill the requirements of the grant, the Project Coordinator must embody specific Knowledge, Skills, and Behaviors (KSBs) that bridge the gap between administrative tasks and youth impact.

Knowledge (The "What")

- **Regulatory Fluency:** A working knowledge of the ESSA Title IV-B statute, EDGAR (Education Department General Administrative Regulations), and the specific Wyoming 21st CCLC Program Guide.
- **Program Fidelity:** Deep familiarity with the approved Grant Application and PIP—understanding that these documents serve as the binding "Roadmap" for operations.
- **Quality Standards:** Understanding of the Wyoming Program Quality Practices and the APAS data tools (APT/SAYO) used to measure them.

Skills (The "How")

- **Fiscal Stewardship:** The ability to align the budget with program needs, ensuring all costs are reasonable, necessary, and allocable (2 CFR §200.403-405) while preventing "supplanting" of funds (ESEA §4204(b)(2)(G)).
- **Data Utilization:** The ability to interpret SAYO and APT data to drive the Continuous Improvement Process (CIP), rather than collecting data solely for reporting compliance.
- **Stakeholder Engagement:** The skill to form and facilitate an active Advisory Council and manage meaningful consultations with private schools and community partners.

Behaviors (The "Why")

- **Proactive Monitoring:** A habit of regularly reviewing data and operations (e.g., the monthly 30-minute data review) to identify risks before they become non-compliance findings or problems impacting staff or youth.
- **Youth-Centric Advocacy:** Consistently prioritizing student safety, belonging, and voice in all management decisions.
- **Ethical Transparency:** A commitment to transparency in fiscal management (e.g., declaring conflicts of interest) and honest self-assessment during the evaluation process.

Operationalizing Compliance

When a Coordinator effectively applies the KSBs above, the program will aim to achieve the following required operational outcomes:

- **Balanced Programming:** Schedules must consistently combine Academic Enrichment (remediation and tutoring) and Youth Development (arts, wellness, and character education). The program must be neither solely an extension of the school day nor purely a recreation center.
- **Equitable Participation & Accommodations:** The program must proactively provide reasonable accommodations for staff and students with disabilities, aligning with IEP/504 plans. Per the General Education Provisions Act (GEPA), Section 427, subgrantees must ensure equitable participation for all beneficiaries. Policies must explicitly address overcoming barriers to participation based on gender, race, color, national origin, disability, and age.

- **Safe & Inclusive Environment:** The Coordinator must maintain a site-specific safety plan, manage transportation to remove barriers, and ensure USDA-compliant nutritious food services. All sites and activities must be welcoming and usable for individuals with disabilities, including providing reasonable accommodations for staff and students (e.g., auxiliary aids, accessible transportation) consistent with the ADA and Section 504 of the Rehabilitation Act.

All detailed site-level policies, safety plans, and operational procedures are governed by the section below, and individual programs shall make and enforce their own policies pertinent to this guidance.

Operations & Safety

Policy and Procedure Development

Safety

A site-specific safety plan (including emergency drills and pick-up policies) must be approved and on file. This comprehensive plan must address all potential risks, including but not limited to:

- **Emergency Procedures:** Detailed, site-specific procedures for fire, severe weather (including specific shelter-in-place locations), medical emergencies, and intruder/lockdown scenarios. Plans must include clear staff roles and responsibilities.
- **Emergency Drills:** A schedule for regular, documented drills (e.g., monthly fire drills, quarterly lockdown drills) that comply with all local and state regulations. Documentation must include the date, time, duration, and any areas needing improvement.
- **Supervision Ratios:** Clear guidelines for required staff-to-youth ratios that meet or exceed the most restrictive state, local, or licensing requirements, ensuring active supervision at all times. Note: If a student's IEP or 504 plan requires 1:1 support, that support must be funded by the district (see Section 4.4) and does not count toward the program's general ratio.
- **Pick-Up Policies:** Strict, written procedures for student release, including authorized pick-up lists, identification verification protocols, and steps for handling late or unauthorized pick-ups.
- **Injury/Accident Reporting:** A defined protocol for documenting, reporting, and investigating all accidents, injuries, and critical incidents.

Health and Wellness

All sites must promote a healthy environment through documentation of policies and procedures for:

- **Sanitation and Hygiene:** Regular cleaning schedules and access to handwashing facilities and supplies. Policies must address the handling of bodily fluids and contagious illnesses, adhering to local health department guidelines.
- **Medication Administration:** Written policies and trained staff for the secure storage and appropriate administration of prescribed and over-the-counter medication, requiring parental consent and clear documentation.
- **Nutrition:** If meals or snacks are provided, they must comply with USDA requirements or other state-approved nutritional standards. Grant funds must be used to supplement, and not supplant (34 CFR § 76.516) existing nutrition efforts. Programs must maximize the use of available federal resources, such as the USDA National School Lunch Program (Afterschool Snack) or the Child and Adult Care Food Program (CACFP), to cover the cost of meals. Attention must be given to documented food allergies and dietary restrictions.

Facility Safety

- **Inspections:** Sites must maintain current documentation of required safety inspections (e.g., fire, health, building codes) and address any identified hazards promptly.
- **Play Area Safety:** If applicable, indoor and outdoor activity areas must be regularly inspected for maintenance needs, and equipment must meet safety standards.

Technology & Internet Access Safety

Per the **Children's Internet Protection Act (CIPA) (Pub. L. 106-554)**, any 21st CCLC program that utilizes grant funds to purchase devices (e.g., Chromebooks, tablets) or provides internet access to students must certify compliance with federal internet safety standards. This requirement applies regardless of whether the program operates in a school or a community-based setting.

Mandatory Protection Measures

To ensure CIPA compliance, the program must demonstrate the following:

- **Technology Protection Measure (Filtering):** All program-accessible devices must be equipped with a technology protection measure (internet filter) that blocks or filters access to visual depictions that are obscene, child pornography, or harmful to minors.
- **Internet Safety Policy:** The program must adopt and enforce a policy that addresses:
  - Access by minors to inappropriate matter on the internet.
  - The safety and security of minors when using electronic mail, chat rooms, and other forms of direct electronic communications.
  - Unauthorized access, including "hacking" and other unlawful activities by minors online.
  - Measures restricting minors' access to materials harmful to them.
- **Public Notice:** The program must provide reasonable public notice and hold at least one public meeting or hearing (this can be part of a regular board meeting) to address the proposed Internet Safety Policy.

School vs. Community-Based Programs

- **School-Based Sites:** If the program operates within a public school and utilizes the district's network and devices, the program is covered under the LEA's existing CIPA certification. The Site Coordinator should maintain a copy of the district's Internet Safety Policy on file.
- **Community-Based Sites:** Non-school entities (e.g., nonprofits, Boys & Girls Clubs) purchasing their own technology or internet service must independently verify they have filtering software installed and a safety policy in place.

Transportation

A written plan ensuring safe travel to/from the center is required to remove barriers to participation. Local policies and procedures should govern:

- **Vehicle Safety:** If the program provides transportation, all vehicles must be properly maintained, insured, and operated by licensed drivers. Vehicles must meet all federal and state safety regulations (e.g., regular maintenance logs, child safety restraints where appropriate).
- **Rider Conduct and Supervision:** Policies addressing student conduct while in transit and ensuring adequate staff supervision during loading, unloading, and travel.
- **Routes and Scheduling:** Clear, documented routes and schedules communicated to parents/guardians.

Operational Hours

Per the eligibility requirements of the Grant Application, all programs must meet the following minimum operational floors to remain compliant with their grant award:

- **School Year:** Programs must operate for a minimum of 6 hours per week for at least 24 weeks during the school year.
- **Summer Term:** Programs must provide at least 6 weeks of programming. This must consist of either:
  - A schedule of 4 days/week for 3 hours/day.
  - A total of at least 72 hours of intensive, experiential learning.
- **Quality Target (The "Dosage" Standard):** While 6 hours is the allowable minimum, research indicates that students need higher "dosage" to achieve significant academic gains.
  - **Recommended Target:** WDE strongly recommends programs operate for 10–12 hours per week.
  - **Adapting for 4-Day School Weeks (The "Fifth Day" Model):** Programs that operate on a "Fifth Day" schedule (such as Fridays only) are required to design their structure so that students have the mathematical opportunity to achieve the 90-hour minimum for "Regular Attendee" status, as mandated by federal guidelines.

Staffing and PD

Personnel Requirements

Program sites must maintain adequate staffing levels and ensure all personnel are properly vetted and qualified.

- **Background Checks:** All paid and volunteer staff who have direct contact with students must undergo state and federal background checks as required by law and WDE policy prior to their start date. Documentation of clearance must be kept on file.
- **Qualifications:** Staff should possess the necessary skills, experience, or certifications relevant to the activities they lead (e.g., certified teachers, subject matter experts, youth development professionals). Job descriptions must clearly outline required qualifications.
- **Hiring Practices:** Sites must utilize non-discriminatory hiring practices and document the process for selecting qualified personnel. In accordance with Section 427 of the GEPA, the program must not discriminate in its employment practices, volunteer selection, or service delivery. Documented procedures must ensure that no person is excluded from participation or denied benefits based on gender, race, color, national origin, disability, and age.

Coordinator FTE & Leadership Requirements

The Project Coordinator position is critical for managing the complex requirements of grant compliance, data reporting, and program quality.

- **Minimum FTE Mandate:** Per the requirements of the approved grant application, grantees must maintain the Project Coordinator position at the level committed to in the original proposal.
- Grantees may not reduce the Coordinator's hours or split the role among multiple existing staff members (e.g., adding duties to a full-time teacher or principal) without prior written approval from the WDE.
- **Vacancies:** If the Coordinator position becomes vacant, the grantee must notify the WDE immediately and provide a plan for interim coverage that maintains the required administrative capacity.
- **Role & Focus:** The Coordinator's time must be protected for 21st CCLC duties. This role cannot be a simple "add-on" to existing central office duties. The Coordinator must have the capacity to:
  - Oversee daily program operations and safety.
  - Manage the budget and federal compliance (EDGAR/Uniform Grant Guidance).

- Lead the CIP and data reporting.
- Engage actively with the Advisory Council and families.

Professional Development

A structured plan for ongoing staff training is mandatory.

- **PD Plan:** Each site must develop and implement an annual PD plan linked to the program's objectives and identified areas for improvement (e.g., based on needs assessments or evaluation data).
- **Required Topics:** PD should cover key areas such as youth development, positive behavior management, subject-specific content (e.g., STEM, literacy), emergency procedures, and family engagement.
- **Documentation:** Sites must maintain detailed records of all staff PD, including dates, topics, hours completed, and participant sign-in sheets.

Equitable Services for Private School Students

Subgrantees receiving 21st CCLC funds must comply with the requirements of ESEA § 8501 regarding the participation of private school children and teachers.

- **Annual Consultation:** Subgrantees must conduct timely and meaningful annual consultation with officials of private schools located within their geographic service area to determine if any eligible students or teachers wish to participate in the 21st CCLC program. Consultation must occur before the subgrantee makes any decision that affects the opportunities of eligible private school children, teachers, and other educational personnel to participate. Subgrantees must maintain a written record of the consultation process, including meeting dates, topics discussed, and the **Private/Homeschool Affirmation of Consultation for Equitable Services** signed by private school officials.
- **Provision of Services:** If a private school accepts services, they must be secular, neutral, and non-ideological. The subgrantee must retain control of the funds and title to all materials, equipment, and property purchased with those funds.
- **Ombudsman & Complaint Process:** To ensure that private school children and teachers receive services that are equitable, the WDE designates an Ombudsman to monitor and enforce these requirements.
  - **Right to File a Complaint:** Private school officials have the right to file a formal complaint with the State Ombudsman if they believe the subgrantee did not engage in consultation that was meaningful and timely, or if the subgrantee did not give due consideration to the views of the private school officials.
  - **WDE Ombudsman Contact:** Shannon Cranmore, **shannon.cranmore@wyo.gov**, 307-777-3672.

Coordination with McKinney-Vento (Homeless) & Foster Youth

Per ESSA § 4203(a)(11), all 21st CCLC programs must ensure that students experiencing homelessness and youth in foster care have equitable access to the same high-quality programming provided to their peers. Subgrantees are required to coordinate directly with the Local Education Agency (LEA) Homeless Liaison and Foster Care Point of Contact to identify students and remove barriers to participation.

To ensure compliance, the 21st CCLC Site Coordinator must implement the following protocols:

- **Identification & Outreach:** The Site Coordinator must maintain regular contact with the district's McKinney-Vento Liaison to proactively identify eligible students. Programs cannot rely solely on general recruitment; targeted outreach to these families is required.
- **Immediate Enrollment:** Students experiencing homelessness must be enrolled immediately, even if they lack documentation normally required for enrollment (e.g., medical records, proof of residency, or guardianship papers). The program must assist the family in obtaining these documents after enrollment has begun.

- **Prioritization:** If the program has a waitlist, students designated as McKinney-Vento or Foster Youth should receive priority placement.
- **Transportation Support:** Lack of transportation is the most common barrier for these students.
  - The program must coordinate with the district homeless liaison if transportation is a barrier for attendance.
  - This includes maintaining stability for students who may live outside the immediate school zone but remain enrolled in the student's school of origin.
- **Prohibition on Segregation:** Services for homeless and foster youth must be provided in the regular 21st CCLC setting. Segregating these students into separate activities or groups is strictly prohibited. They must be fully integrated into the academic and enrichment activities described in the PIP.

Fiscal Management & Internal Controls

Allowable Costs & Supplanting

Supplement not Supplant

Funds must add to (supplement) the existing level of state or local services, not replace (supplant) them. Subgrantees must be able to demonstrate that 21st CCLC activities would cease if the federal funding were removed, but that existing local programming would continue. This ensures federal funds provide new opportunities.

Program Income

Wyoming prohibits the generation of any income from the 21st CCLC program. This means no fees can be charged to participants (students or parents) for any part of the program, including registration, activity fees, materials, or transportation paid for with 21st CCLC funds.

Personnel & Inventory

Time & Effort

- **Time & Effort:** (Time Distribution) Documentation Per the Uniform Grant Guidance (2 CFR § 200.430), accurate Time & Effort reporting is strictly required for all employees whose compensation (salary, wages, stipends, or extra duty pay) is paid in whole or in part with federal funds. Reference the current **WDE - Time and Effort Federal Guidance Document** for more detailed information.
- **The "Allocable" Rule:** Payroll costs are only allowable if they are supported by time distribution records that accurately reflect the work performed. This applies to all staff, including part-time employees, substitutes, and those paid specifically for extra-duty or stipends. Records must be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated.

Documentation Types

Subgrantees must use the correct form based on how the employee is funded and how many "Cost Objectives" they work on.

- **Single Cost Objective (100% of Time):** Employees who work 100% of their time on a single cost objective (e.g., a Site Coordinator dedicated solely to the 21st CCLC grant) must complete a Periodic Certification. Certifications may be completed semi-annually (every six months) or quarterly,

depending on your district's written policy. The document must be signed after the fact by the employee or a supervisor with firsthand knowledge of the work.
    - Sample: **Single Cost Objective Documentation**.
- **Multiple Cost Objectives (Split-Funded / PARs):** Employees who work on multiple cost objectives (e.g., a teacher paid 50% by the General Fund for the school day and 50% by 21st CCLC for afterschool) must maintain a Personnel Activity Report (PAR). These records typically must be prepared monthly (or no less than quarterly) to track the actual distribution of time. The record must account for 100% of the employee's activity (not just the federal portion) and must be signed by the employee.
    - Sample: **Multiple Cost Objectives Documentation**.
- **Blanket Certification (Group):** A "Blanket Certification" may be used to cover multiple employees working on the same single cost objective (e.g., a group of staff attending the same PD training). It must be signed by a supervisor with firsthand knowledge of the work performed.
    - Sample: **Blanket Certification**.

Inventory Control & Management

For the purposes of this policy, valuation thresholds are based on Wyoming State Auditor guidelines and 2 CFR § 200.313:

- **Supplies/Inventory:** Items with a unit cost between $500 and $4,999. While classified as "Supplies" for federal reporting, these are considered "Non-Capital Inventory" by the State and must be tracked to prevent theft.
- **Equipment:** Tangible personal property with a useful life of more than one year and a per-unit acquisition cost of $5,000 or more.

Disposition Process

When original or replacement property acquired under a federal award is no longer needed for the original project, the following disposition rules apply based on the item's classification:

- Non-Capital Inventory ($500 – $4,999)
    - **Federal Obligation:** None. The federal government considers these items "supplies" (expensed at purchase). There is no obligation to reimburse the federal awarding agency.
    - **State/Agency Obligation:** The item must be removed from the agency's internal inventory log. The disposal must be documented (e.g., "End of Life – Recycled") to satisfy state inventory tracking requirements.
- **Capital Equipment ($5,000+):** The subgrantee must request disposition instructions from the SEA or follow federal rules (2 CFR § 200.313(e)) based on the current Fair Market Value (FMV):
    - **Current FMV Under $5,000:** Items with a current per-unit fair market value of less than $5,000 may be retained, sold, or otherwise disposed of with no further financial obligation to the federal awarding agency. The disposal must still be recorded in the fixed asset system.
    - **Current FMV Over $5,000:** Individual items with a current per-unit fair market value in excess of $5,000 may be retained by the non-Federal entity or sold. However, the federal awarding agency is entitled to compensation. The amount due is calculated by multiplying the current market value (or sale proceeds) by the federal awarding agency's percentage of participation in the cost of the original purchase.
- **Documentation:** All disposals, regardless of value, must be recorded in the inventory log or fixed asset system. Records must include:
    - Description and Serial Number/Tag ID.
    - Source of funding (FAIN or Grant ID).

- Acquisition date and cost.
- Date of disposal and method (trash, sale, donation, and trade-in).
- Sale price or Fair Market Value at time of disposal (if applicable).

Reimbursement Cycle

Subgrantees must submit a request for payment at least quarterly (October, January, April, and by June 30th for end of fiscal year). Requests for salaries and benefits (100 and 200 series expenses) should be submitted monthly. Each request must be submitted as a Cash Request (CR) in the eGMS system.

Submitting a Cash Request in eGMS

To align with WDE's consistency goals across federal programs:

- **100 and 200 series expenses:** (Salaries and Benefits): CRs containing only these expenses do not require supporting documentation. Submitting monthly is suggested to show timely drawdown.
- **300 and 400 series expenses: (**Non-Personnel): CRs including these expenses require supporting documentation. To improve the fiscal auditability of records, 21CCLC requests shall include individual receipts, invoices, or a detailed general ledger for all 300 (Purchased Services) and 400 (Supplies and Materials) series expenditures. This documentation shall provide evidence of the what (item purchased), where (vendor), when (date of purchase), and why (program purpose/justification) of the purchase.
- **CR Review:** CRs are first reviewed by the Program Consultant for allowability, then by the Fiscal Specialist for final approval.

Best Practices for Timely Drawdown

- Submit a CR monthly for your 100 and 200 series expenses.
- Submit a CR at least every quarter to demonstrate timely drawdown for audit purposes.
- **Important eGMS Note:** You can only submit one active CR per program for each batch. A new request can be submitted once the previous one is processed through WOLFS.

Carryover

Unspent funds remaining at the end of a grant year are considered "carryover." The program monitors carryover to ensure funds are being expended as intended. Excessive Carryover (defined here as over 20% of the annual grant award) triggers a review by the WDE to determine if a budget revision or reduction is necessary. The Tydings Amendment automatically extends the grant availability by one year, but unspent funds are still subject to program review.

Costs for Inclusive Support (Students with Disabilities)

21st CCLC programs are required by federal civil rights law to be inclusive and accessible to students with disabilities. However, because students with disabilities also have legal rights under the Individuals with Disabilities Education Act (IDEA), determining who pays for what can be confusing.

Supplement, Not Supplant Check

21st CCLC funds must be used to provide supplemental services. They cannot pay for services that the school district is already legally required to provide under a student's Individualized Education Program (IEP) or Section 504 Plan to ensure a Free Appropriate Public Education (FAPE).

Allowability Matrix: Who Pays?

Use this table to determine if a cost should be paid by the 21st CCLC grant or the District (General Fund/IDEA).

EXPENSE CATEGORY	ALLOWABLE COST	UNALLOWABLE
Staffing/Aides	Hiring an additional aide so a student with high needs can safely participate in a robotics club or field trip.	Paying for an aide to sit with a student during a "credit recovery" class that is required for graduation (school responsibility).
Therapies	Incorporating therapeutic activities into a club (e.g., fine motor skills in an art class).	Paying for clinical Speech, Occupational, or Physical Therapy sessions mandated by the IEP.
Transportation	Busing a student home after the program ends (including lift buses).	Busing a student from the school to their home during the school day or for IEP-related appointments.
Equipment	Adaptive scissors, sensory-friendly furniture, or large-print materials for use during program hours.	Personal devices (e.g., hearing aids, dedicated communication tablets) that the student requires 24/7 or for the school day.

Best Practice: The "IEP Check"

If a student with a disability applies to your program, the Site Coordinator should consult with the Special Education Director to answer one question:

- "Is the support this student needs for afterschool activities already written into their IEP as a district obligation?"
  - **If YES:** The District must provide/fund the support (e.g., a 1:1 aide required for all school-sponsored activities).
  - **If NO:** The 21st CCLC program can pay for the support to ensure equitable access.

Cost Sharing & Reimbursement Methods

- **Extended Hours:** If a paraprofessional is already employed by the district from 8 a.m. – 3 p.m., the 21st CCLC grant may pay their hourly wage (plus benefits) for the additional hours worked in the after-school program (e.g., 3 p.m. – 5:30 p.m.).
- **Rate of Pay:** Staff should generally be paid their district-established hourly rate.
- **Contracting:** For community-based (non-school) grantees, the program may contract with the school district to reimburse the district for the cost of the aide's time, or hire the aide directly as a program employee.

- **Documentation Requirement:** When submitting CRs for 1:1 support, the program should maintain internal documentation (not sent to WDE, but kept on file) confirming:
  - The student required the support to participate safely (linked to 504/IEP needs).
  - The nature of the support was related to program participation, not general special education therapy.

Procurement Standards & Conflict of Interest

To ensure federal funds are used efficiently and transparently, all 21st CCLC subgrantees must adhere to the federal procurement standards outlined in the Uniform Grant Guidance (2 CFR § 200.318 – 200.327) in addition to any state or local regulations. To ensure federal funds are used efficiently and transparently, all 21st CCLC subgrantees must adhere to the federal procurement standards outlined in the Uniform Grant Guidance (2 CFR § 200.318 – 200.327) in addition to any state or local regulations. When multiple regulations apply (federal, state, or local), the subgrantee must follow the most restrictive policy.

Conflict of Interest Policy

Subgrantees must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award, and administration of contracts.

- **Prohibition:** No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest.
- **Definition:** A conflict of interest exists when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.
- **Gifts:** The officers, employees, and agents of the subgrantee must neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts.

Reporting Fraud, Waste, and Abuse

To ensure the integrity of federal funds, all subgrantees must establish and publicize a specific policy and mechanism for employees, contractors, and the public to report suspected fraud, waste, or abuse of Title IV-B funds.

- **Internal Reporting:** The subgrantee must designate a confidential channel (e.g., a specific administrator, third-party hotline, or secure web form) for internal reporting that protects the identity of the whistleblower from retaliation.
- **External Reporting:** Subgrantees are required to report any evidence of criminal misconduct, fraud, or significant waste of federal funds to the WDE immediately. Reports may also be made directly to the U.S. Department of Education Office of Inspector General (OIG) Hotline at 1-800-MIS-USED (1-800-647-8733) or via the **OIG website**.
- **Public Posting:** Contact information for reporting fraud must be visibly posted at the program site and on the program's website.

Procurement Thresholds

If your local district or organization's policies set lower thresholds than the federal limits below (e.g., requiring quotes for purchases over $500), you must follow the stricter local policy. Subgrantees must use one of the following methods of procurement based on the dollar amount of the purchase.

Micro-purchases (Direct Purchases)

- **Definition:** Per W.S. 9-2-3204 and A&I General Services Division, this tier allows for the immediate purchase of items (Direct Purchases) without competitive bidding or soliciting multiple quotes, provided the price is considered reasonable.
  - Goods/Supplies: $0 – $2,500
  - Services: $0 – $1,500

- **Requirement:** Agencies can buy directly from a vendor. While you do not need formal quotes, you must ensure the price is fair and reasonable.
- **Best Practice:** Distribute micro-purchases equitably among qualified suppliers to the extent practicable.

Small Purchases (Informal Bids)

- **Definition:** Purchases of services, supplies, or other property where you are required to "shop around" to ensure competition, but the process is less formal than a sealed bid.
  - Goods/Supplies: $2,500 – $15,000
  - Services: $1,500 – $15,000
- **Requirement:** You must solicit informal quotes (typically from at least 3 vendors). These quotes can often be obtained via telephone, email, or a catalog price check.
- **Documentation:** You must retain records of the quotes received (e.g., screenshots, emails, written bids) and the rationale for selecting the chosen vendor. These quotes must be documented in the procurement file.

Sealed Bids & Competitive Proposals (Formal Competition)

- **Definition:** Formal procurement methods are required for purchases exceeding $15,000.
  - $15,000 and above (for both Goods/Supplies and Services)
- **Requirement:**
  - **Competitive Sealed Bidding:** You must issue a formal Invitation for Bid (IFB) or Request for Proposal (RFP). Bids are publicly solicited, and a firm fixed-price contract is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the IFB, is the lowest in price.
  - **Competitive Proposals:** RFPs must be publicized and identify all evaluation factors and their relative importance.
  - **Public Notice:** The bid must be publicly advertised.
  - **Sealed Process:** Bids are submitted in a sealed format and opened publicly at a designated time.

Non-Competitive Procurement (Sole Source)

Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source. This method may be used only when one or more of the following circumstances apply:

- The item is available only from a single source.
- The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation.
- The Federal awarding agency (or WDE) expressly authorizes noncompetitive proposals in response to a written request from the subgrantee.
- **Documentation:** Sole source procurements require a written justification explaining why only one specific vendor could meet the need, which must be kept on file for audit purposes.

Stevens Amendment & Branding Requirements

Mandatory Federal Disclaimer Per the "Stevens Amendment" (Public Law 101-166, Section 511), all Wyoming 21st CCLC subgrantees must include a specific funding statement on all public-facing materials that describe the federally funded program. This requirement applies to press releases, bid solicitations, brochures, flyers, websites, and social media pages.

Any public announcement or document describing the 21st CCLC program must clearly state:

- The percentage of the total costs of the program or project which will be financed with federal money.
- The dollar amount of federal funds for the project or program.
- The percentage and dollar amount of the total costs of the project or program that will be financed by non-governmental sources.

Example Statement

"This 21st CCLC program is supported by the Nita M. Lowey 21st Century Community Learning Centers grant from the U.S. Department of Education, administered by the WDE. For the [Current Fiscal Year], the program is funded 100% by federal funds totaling $[Insert Grant Award Amount], with 0% financed by non-governmental sources."

Wyoming 21st CCLC Logo

In addition to the text disclaimer, subgrantees are encouraged to display the official **Wyoming 21st CCLC logo** on program materials and websites to maintain consistent state branding. However, the logo does not replace the text requirement of the Stevens Amendment.

Single Audit Requirement

Subgrantees expending $1 million or more in total federal funds (from all federal programs, not just 21st CCLC) during their fiscal year must submit a Single Audit reporting package. This audit must be conducted by an independent auditor in accordance with the requirements of 2 CFR 200, Subpart F, Audit Requirements.

Failure to complete and submit the Single Audit report to the Federal Audit Clearinghouse (FAC) within the required timeline (the earlier of 30 calendar days after receipt of the auditor's report or nine months after the end of the audit period) is a serious compliance issue and will result in an audit finding against the subgrantee.

Record Retention & Access

Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to the Federal award must be retained for a period of three (3) years from the date of submission of the final CR as mandated by 2 CFR § 200.334.

Exceptions

- **Litigation, Claims, or Audits:** If any litigation, claim, or audit is started before the expiration of the 3-year period, the records must be retained until all findings involving the records have been resolved and final action taken.
- **Equipment:** Records for real property and equipment acquired with Federal funds must be retained for 3 years after final disposition.

Required Records

To ensure monitoring readiness, grantees should maintain digital or physical copies of:

- **Programmatic Records:** Attendance logs, enrollment forms, safety drill logs, and evidence of family engagement activities.
- **Fiscal Records:** Grant awards notices (GANs), approved budget revisions, procurement documentation (quotes/bids), receipts/invoices, time and effort certifications, and inventory logs.

Access to Records

The WDE, the U.S. Department of Education, the Comptroller General of the United States, or any of their authorized representatives, must have the right of access to any documents, papers, or other records of the non-Federal entity which are pertinent to the Federal award, in order to make audits, examinations, excerpts, and transcripts.

Indirect Costs & Administrative Caps

What are Indirect Costs?

Indirect costs are "overhead" expenses that benefit your entire organization, not just the 21st CCLC program. Because these costs are shared across the whole district or CBO, they cannot be easily billed to a single grant.

- **Examples:** Electricity, heating/cooling, water, sewer, custodial services, payroll processing, human resources, etc.

Rule 1 - The "Restricted Rate" Requirement

Because the 21st CCLC grant is a "supplement, not supplant" program (meaning federal funds cannot replace local funds), you are strictly limited in how much overhead you can claim.

- **You MUST use a Restricted Rate:** You cannot use your standard "Unrestricted" rate. You must use the Restricted Indirect Cost Rate negotiated and approved by the WDE.
- **No Rate = No Funding:** If your district or organization does not have a current, approved Restricted Indirect Cost Rate on file, you cannot charge indirect costs to this grant.

Rule 2 - The 15% Administrative Cap

To ensure the majority of grant funds are spent directly on student services, Wyoming sets a strict limit on administrative spending.

- **The Limit:** Your Total Administrative Costs cannot exceed 15% of your total annual grant award.
- **What Counts Toward the 15%?** You must add two numbers together to see if you are compliant:
  - **Direct Administrative Costs:** Money spent specifically to manage the 21st CCLC program (e.g., the Program Director's salary, office supplies, travel for admin meetings).
  - **Indirect Costs:** The overhead amount you calculated using your restricted rate.
- **Compliance Check:** WDE will verify this during budget reviews. If (Line Item 100/200 Admin + Indirect Costs) > 15%, your budget will be returned for changes.

How to Calculate Indirect Costs (The Base)

You cannot simply apply your rate to your total grant award. You must apply it to your Modified Total Direct Costs (MTDC).

- Simple Translation: You can charge overhead on most things (salaries, supplies, travel), but you cannot charge overhead on:
  - Equipment (capital assets over $5,000).
  - Rental costs (e.g., renting a building).
  - The portion of any sub-contract that exceeds $25,000.

FAQ: How Can We Spend the "Recovered" Funds?

This is the most common question from Business Managers. Once you have calculated your indirect costs and drawn down the funds from the grant, how can that money be used?

- **It is a Reimbursement:** Legally, "recovering indirect costs" is the federal government paying you back for overhead expenses your district has already paid using local funds (like the light bill or the payroll clerk's salary).

- **No Restrictions After Recovery:** Once the funds are drawn down and deposited into your account, they lose their "federal identity."
  - Can we put it in the General Fund? Yes.
  - Can we use it to pay the light bill? Yes.
  - Do we have to track it separately? No.
- **Why?** The "restriction" happens before you get the money (by using the lower Restricted Rate calculation). Once the money is recovered, it is considered general revenue for your district to use as it sees fit.

Monitoring, Risk, & Compliance

Risk Determination Framework

The WDE will classify subgrantees annually into one of three categories based on a comprehensive Risk Assessment (**A-1 form**). This classification determines the level and focus of monitoring activities, as detailed below.

A Level I designation represents more than just compliance; it is the aspirational standard for every Wyoming 21st CCLC subgrantee. It signifies a program that has successfully moved from managing compliance to leading for quality. Achieving this status means the program has established a robust backbone of operational health: all six "Simple 6" Principles are fully implemented (e.g., MOU is signed, Advisory Council met, Annual Local Evaluation Report submitted by June 30); performance goals are consistently met (serving at least 85% of Regular Attendees); and administrative integrity is paramount (all CIRs and CRs are submitted on time with required documentation). In short, a Level I program is an efficiently-run, student-focused organization that proactively manages risk and has no unresolved Level II warnings from the previous year, allowing it to dedicate maximum resources and energy directly to student success.

Risk Assessment and Action Plan

RISK LEVEL	CRITERIA	ACTION REQUIRED
Level I: No Apparent Risk	Subgrantee meets all "Simple 6" programmatic deadlines and fiscal reporting requirements for the review period.	Desk Monitoring only. No additional action or documentation is required beyond routine reporting (CIRs, CRs).
Level II: Low Risk / Warning	Minor non-compliance issues are noted (e.g., new grant coordinator, late trimester CIR submission, delays in federal 21APR reporting, minor fiscal errors, or slight dips in attendance).	Targeted technical assistance will be provided. A formal "Warning" status will be issued, requiring submission of the 30 day Warning Response Plan (**W-2 form**) within 30 days to correct the deficiency.

RISK LEVEL	CRITERIA	ACTION REQUIRED
Level III: High Risk / Out of Compliance	Failure to resolve previously issued warnings, significant programmatic failure (e.g., serving less than 75% of target Regular Attendees), or documented fiscal mismanagement.	Mandatory on-site monitoring visit. Implementation of a formal Corrective Action Plan (**CAP-3 form**) is required immediately. Grant funds are subject to withholding or reduction until compliance is achieved.

Grant Cycle & Continuation

In accordance with ESSA § 4204(b)(2)(B), subgrants awarded by the WDE under this part shall be for a period of not less than three years and not more than five years.

Wyoming Grant Cycle

Historically, WDE has awarded grants on a 4-year or 5-year continuation cycle, with 3, 4, or 5-year renewability terms. However, funding is not guaranteed for the full period. Continuation of the grant award after the initial year is contingent upon:

- Annual legislative appropriation of Federal funds.
- The subgrantee's ability to demonstrate substantial progress toward meeting the goals and objectives outlined in their approved application.
- Compliance with all state and federal requirements as determined by the Risk-Based Monitoring system.

To maintain eligibility for the full 5-year grant cycle, a subgrantee must demonstrate and remain in "Substantial Compliance" as defined by the WDE. Substantial Compliance is the sustained operational and fiscal health of the grant, ensuring the program is meeting its core commitments to serve the target population effectively.

Compliance Criteria and Required Documentation

COMPLIANCE REQUIREMENT	CRITERION
Regular Attendees (Year 1)	Must serve at least 75% of projected Regular Attendees by the end of Grant Year 1.
Regular Attendees (Years 2-5)	Must serve at least 85% of projected Regular Attendees by the end of Grant Years 2 through 5.
Reporting & Fiscal Health	Must submit all CIRs and all CRs on time and with the required documentation.

Consequence

Failure to achieve Substantial Compliance in any two years of the grant cycle, whether consecutive or non-consecutive, may result in the termination of the grant award, initiated through the Grant Termination Notification (**GTN-4 form**).

Monitoring Schedule

WDE employs a tiered monitoring schedule designed to support program fidelity and safety through a tiered approach based on the grantee's experience and performance level. Please refer to the Grantee Monitoring Framework infographic below for a visual breakdown of these workflows.

Standard Monitoring (All Grantees)

The foundation of our oversight is the Desk Review. Regardless of tenure, all grantees are monitored three times a year through a review of three key documents as well as scheduled data submissions:

- Program Implementation Planner (PIP)
- Continuous Improvement Reports (CIRs)
- Reimbursement Requests (CRs)

New Grantees (Years 1-2)

To ensure a strong start, new grantees are subject to a mandatory on-site visit. Using the Site Visit Protocol (**SVP-5**), this visit focuses on:

- Verifying that "Intentional Design" (Principle 1) is being implemented with fidelity.
- Confirming that all Section 3 Operations and Safety protocols are securely in place.

Established Grantees (Years 3-5)

Established programs transition to an Annual Spring Risk Assessment (using the **A-1 form**). This review utilizes data from CIRs, Attendance reports, and CRs to determine if a full on-site visit is necessary.

Statewide Evaluation & Reporting System

To ensure compliance with federal and state regulations and to drive continuous program improvement, the Wyoming 21st CCLC program operates under a unified Continuous Improvement Cycle. This system is not merely a set of deadlines; it is the operational engine of Principle 3 (Continuous Improvement) and Principle 4 (Evaluation) of the "Simple 6" Framework. It aligns the Federal Government Performance and Results Act (GPRA) program outcomes (PPOs) and Wyoming's Specific Goals with the three required data reporting tracks: 21APR (Federal), WDE521 (State), and APAS (Quality).

The "Why": Statewide Goals & Objectives (2022–2027)

All data collection and evaluation activities are designed to measure progress toward three specific performance goals. Your program's success—and future funding—is evaluated based on your ability to meet these objectives.

Performance Goal 1: Academic Support (Federal GPRA)

Programs will provide academic enrichment and support that aids students in meeting state and local academic standards.

- **Objective 1.1:** Participants will demonstrate growth in Reading/Language Arts on state assessments.
- **Objective 1.2:** Participants will demonstrate growth in Mathematics on state assessments.

Data Source: 21APR (State Assessment Data reported annually).

Performance Goal 2: Youth Development (Federal GPRA)
Programs will offer a broad array of services that improve student engagement, behavior, and school-day attendance.

- **Objective 2.1:** Regular attendees will improve their school-day attendance.
- **Objective 2.2:** Regular attendees will demonstrate improved classroom engagement (teacher-reported).
- **Objective 2.3:** Participants will decrease in-school suspensions.

Data Source: 21APR (School Day Attendance & Suspension Data) and classroom teacher student engagement surveys.

Performance Goal 3: Family Engagement (Wyoming Specific)
Programs will offer families active and meaningful engagement opportunities that build capacity to support their children's education.

- **Objective 3.1:** Families will report increased Capabilities (skills/knowledge), Connections (networks), Cognition (beliefs/values), and Confidence (self-efficacy) to support their student's learning.

Data Source: Local Parent Surveys & Activity Logs (reported annually).

The "How": Local Periodic Evaluation
While the State tracks the goals above, the Subgrantee is responsible for the Local Periodic Evaluation that drives them. This is the monthly and annual work of the "Simple 6."

The Continuous Improvement Cycle
Evaluation is not an end-of-year event; it is a cycle of inquiry.

- **Engage:** Conduct needs assessments (e.g., student/parent surveys) to identify gaps.
- **Design:** Align activities in your PIP directly to the specific objectives in Goal 1, 2, or 3.
- **Implement:** Deliver programming while collecting real-time participation data.
- **Adjust:** Use the CIR in January to identify low-attendance activities or struggling students and modify the program mid-year.

The Annual Local Evaluation Report
By June 30 of each year, every grantee must submit a comprehensive Local Evaluation Report. This document serves as the capstone of your evaluation work. The full content requirements for this report are detailed in Section 2.4 (Principle 4: Evaluation). Per federal law, this report must be made available to the public (e.g., posted on your website).

The "When": Data Collection & Reporting Cycles
To feed the evaluation system, subgrantees must effectively manage three parallel reporting cycles. Failure to meet deadlines in any cycle will result in a Level II (Warning) or Level III (High Risk) finding.

- **Defining the Reporting Year:** For the purpose of federal data collection and reporting, the 21st CCLC Grant Year for a subgrantee is defined by a Summer-First Cycle.
  - **Reporting Year Start:** The reporting year begins with the Summer Term program.
  - **Reporting Year End:** The year concludes with the end of the subsequent School Year programming or student graduation.

- **Fiscal Note on Summer Programming:** Due to the federal Tydings Amendment and the carryover policy, funds from the previous fiscal year may be used to operate the summer program, but the student outcomes and attendance data collected will be attributed to the new federal reporting year.

Cycle 1: Federal Reporting (21APR)

Measuring Goals 1 & 2 (Academic & Youth Development) This is the mandatory federal data collection reported to the U.S. Department of Education. This cycle reports on previous summer and academic year data disaggregated.

REPORTING WINDOW	DATA REQUIRED	DEADLINE	COMPLIANCE NOTE
Window I	Activities, Staffing, and Student Participation.	**Opens:** Aug **Closes:** Late Oct	Data locks in October. Ensure all demographics and "Regular Attendee" flags are accurate.
Window II	State Assessment Scores (Goal 1), GPA, School Attendance, Behavior, and Teacher Surveys (Goal 2).	**Opens:** Nov **Closes:** Early Feb	Requires collaboration with your school district to secure validated student data.

Cycle 2: State Data (WDE521)

Measuring Participation & Reach. The WDE521 measures the "dosage" students receive directly after each semester or summer term, which is the leading indicator for all other outcomes.

TERM REPORT	DATA COVERAGE	SUBMISSION WINDOW	KEY ACTION POINT
Summer Report	Covers June, July, August	Late Sept – Mid Oct	Due shortly after the budget period ends. This submission coincides with the finalization of 21APR Window I data.
Fall Report	Covers Sept, Oct, Nov, Dec	Mid Jan – Late Feb	Captures the first half of the school year. Crucial for informing the Winter CIR.
Spring Report	Covers Jan, Feb, March, April, May	Mid June – Mid July	Captures the second half of the school year and concludes the state-level attendance tracking for the grant year.

Cycle 3: Program Quality (APAS)

Measuring Program Quality & Goal 3 (Family Engagement) This track uses the Afterschool Program Assessment System (APAS) tools to measure the quality of the environment and the perceptions of stakeholders.

SEASON	TOOL/ACTIVITY	REQUIREMENT	CIP PURPOSE
Summer	Summer Observation	June – Aug: Conduct at least one formal observation of the Summer Program using the APT tool.	June – Aug: Conduct at least one formal observation of the Summer Program using the APT tool.
Winter	CIR (Continuous Improvement)	Jan 15: Submit Quarterly CIR.	Mid-Year Check: Analyze Fall WDE521 data against your goals. Are you on track to meet your "Regular Attendee" target?
Spring	SAYO (Surveys)	April – May: Administer "Survey of Academic and Youth Outcomes (SAYO)" to: Students (SAYO-Y), Staff (SAYO-S), and School Day Teachers (engagement survey).	Mid-Year Check: Analyze Fall WDE521 data against your goals. Are you on track to meet your "Regular Attendee" target?
Summer	Local Evaluation Report	June 30: Submit the comprehensive Local Evaluation Report.	Summarize progress toward all PIP goals using data from all three tracks (21APR, WDE521, and APAS) for the entire grant year.

Appendices

- **Appendix A:** Allowable vs. Unallowable costs
- **Appendix B:** "Change of Scope" Application Revision Trigger
- **Appendix C:** Safety Standards Checklist
- **Appendix D:** Subgrantee Appeals Process
- **Appendix E:** *Glossary of Terms & Acronyms*