**21st CCLC - Fiscal Requirements Webinar**

**September 28, 2022**

**Q and A**

1. **Are there any "cheat sheets" for all of these requirements: procurement, travel, cost principles policies?**

*On the NYSED 21st CCLC website, there is* [*Financial Management and Allowability Sheet*](https://www.p12.nysed.gov/sss/documents/AllowableandUnallowableCosts2.28.20.pdf) *with information about the categories of expenditures and general information on allowable costs. Applicable cost principles and administrative regulations are available in the Fiscal Guidelines for Federal and State Aided Grants at* [*http://www.oms.nysed.gov/cafe/guidance/guidelines.html*](http://www.oms.nysed.gov/cafe/guidance/guidelines.html)**.** NYSED is in the process of developing an updated Fiscal Manual template, which will be posted to the NYSED and ROS websites soon.

1. **Is there a PDF link for the EDGAR guidelines that we can download to have a searchable version of the guidelines?**

*If you go to* [*www.ecfr.gov*](http://www.ecfr.gov)*, and you search for the 2 CFR Part 200, or 34 CFR Part 76, you can search through all of the applicable rules and regulations.*

1. **What if a program received 21st CCLC funds in Round 7, and those funds ended prior to receiving 21st CCLC funds for Round 8?**

*If a program received 21st CCLC funds in Round 7, and those funds ended prior to receiving 21st CCLC funds for Round 8, that would not be considered supplanting.*

1. **How do the ESSER COVID funds apply to supplement not supplant?**

*ESSER funds can be used to supplant any other funds. However, since 21st CCLC funds cannot supplant other federal programs, using 21st CCLC funds to pay for a cost that was paid for with ESSER funds in the prior year will be considered unlawful supplanting. The only way to rebut this presumption of supplanting is after September 30, 2024, when the period of performance on ESSER III funds ends.*

1. **Can you use 21st CCLC funds to support other programming (ESD - Extended School Day or Empire)?**

*Subgrantees cannot use 21st CCLC funds to support other programs as your 21st CCLC funds must be used to implement programming as specifically outlined in the RFP:* [*https://www.p12.nysed.gov/funding/2022-2027-21st-cclc/nysed-rfp-gc-22-001-21st-cclc-round-8-revised.pdf*](https://www.p12.nysed.gov/funding/2022-2027-21st-cclc/nysed-rfp-gc-22-001-21st-cclc-round-8-revised.pdf) *and as outlined in your proposal. You should also be aware of not supplanting other funded programming. Braiding of funds is allowed but documentation of all 21st CCLC costs (supplies, staffing, purchased services, as well as, 21st CCLC attendance counts, must be kept separately from any other funding.*

1. **How should we document presumption of supplanting when we have a justifiable rebuttal (such as the end of a funding period)?**

*Your records for that funding source would provide the evidence/proof.*

1. **Do we need to document that a check for suspension/debarment had been made? If so, how should it be documented?**

 *Yes, you need to document that a check for suspension/debarment was completed. While federal rules allow you to document this in different ways, the most effect option is to do a search on* [*https://sam.gov/content/exclusions*](https://sam.gov/content/exclusions)*, and either print the results or do a “screen capture” to save in your files.*

1. **Can we use the PARs and timesheets that our agencies already use, and not use a specific NYS 21st CCLC PARs or PAIR report template?**

*Yes as long as it includes the pertinent information.*

1. **Do time/ effort reports need to be signed by the employee if tracked in the financial system?**

*This is dependent on your internal time & effort procedures. If the proceduress require a signature, then the forms must be signed. However, as long as someone is able to certify the accuracy of the record after the end of the reporting period, you have flexibility regarding signatures.*

1. **How soon are funds available after the budget is approved?**

*The budget is first approved in the program office and then it is sent to the MWBE office for approval. It is then entered into PTS and sent to Grants Finance for processing who will then send the GAN and okay the release of the 20% advance of the funds. The process can take several weeks, depending on how backed up Grants Finance is in their processing for the entire department. Also, grant contracts (Type of ward CBOS get) take longer than straight grants (type of award that school districts get) After the 20% advance is released, funding is released on a reimbursement basis with the submissions of the FS25. The FS25 does not come to the program office but should be sent directly to Grants Finance.*

1. **What is subrecipient monitoring?**

*Subrecipient monitoring is the SMV process. Subrecipient means the same thing as subgrantee. NY State is the recipient of the grant. It then holds a competition to award the funding to subrecipients.*

1. **If ESSR is being used for other age groups/target audiences, does that justify supplementing not supplanting?**

*Yes. Funding from separate sources must be tracked separately.*

1. **If we run out of ESSR funds for a program in October, then can we use 21st CCLC funds to keep the program going?**

*21st CCLC funds cannot supplant other federal funds. So Using 21st CCLC funds to pay for a cost that was paid for with ESSER in the prior year will bring up an automatic presumption of supplanting. The only way to rebut the presumption is if there simply is no more ESSER funding, which will not be true until October 1, 2024.*

1. **If a school is providing ELA tutoring services, can we partner with them to provide additional ELA services?**

*Yes, this can be done if you are supplementing (adding) to existing programming and not supplanting (replacing) it. All documentation for 21st CCLC costs and attendance must be kept separate.*

1. **Is the search for suspension applicable for prior vendors?**

*Yes. You are required to complete the search for any contract over $25,000, though it is considered a best practice to complete the search for all contracts. The fact that they are a prior vendor does not mean they have not been added to the exclusions list following your prior contract.*

1. **Are digital signatures for time and attendance acceptable? Like ADP?**

*As long as this is in line with your written procedures, and the software only allows individuals to add their own digital signatures, this would still be allowable.*

1. **If a CBO received COVID stabilization funds, do those have to be exhausted prior to using 21st CCLC funds? Or should COVID stabilization funds be exhausted prior to receiving our 21st CCLC contract?**

*No, only if the 21st CCLC program is providing the exact same service. The two programs or services can be operating simultaneously but the funding, attendance and documentation must all be kept separately and not comingled.*

1. **How would the program demonstrate a break or the exhaustion of other funds? Does this mean the organization needs to stop providing the services and then relaunch the program with the new funds?**

*There needs to be a clear delineation of fiscal and program records so that it is clear where 21st CCLC programming starts and other programing ends. The programming can be simultaneous with other programming and other funding sources if all recordkeeping is kept separate. Q – Is the 21st CCLC program identical to another program that is ending? The 21st CCLC program must be the program that was described in your application.*

1. **If a school district bids for buses, as a CBO, do we need to put out a RFP for busing or can we use the district’s vendor knowing they went through the bid process?**

*If the district’s contract would cover your use, this is allowable. If, however, you have to enter into a new/separate contract with the vendor, you must use a competitive process.*

1. **If we are purchasing fitness equipment and training, all items total $175,000, would we have to bid?**

*Absolutely.*

1. **Is there a preference from NYSED as to whether PARS is done monthly, semi annually, or annually?**

*PARs are mandatory reports that must be completed for each employee of the program that verifies the percentage of time worked and paid through the 21st CCLC program. NYSED requires that PARs are completed monthly or semi-annually. Split funded staff must complete monthly PARS. Staff that are 100% can complete PARS semi-annually.*

*There are sample PARS on the NYSED website here:* [*https://www.p12.nysed.gov/sss/21stCCLC/*](https://www.p12.nysed.gov/sss/21stCCLC/) *under “suggested templates”*