



Things to know about the **braiding** of 21st CCLC funds with other federal, state or local funds.

The US Department of Education's program manager for New York State's 21st CCLC grant program has provided this response to questions posed by NYSED's program office about the braiding of 21st CCLC funds with other federal, state and local funding sources:

“The Department encourages grantees and subgrantees to braid funds as a way of expanding the program. Activities paid for with other sources of funding can be part of the 21st CCLC program. Staff can be paid with both 21st CCLC funds and other funds. If any part of an activity is paid for with 21st CCLC funds, students participating in that activity should be counted in attendance reported in 21APR. Lastly, subgrantees must track and account for 21st CCLC funds separately from other sources of funding they may have.”

While this was helpful, it still left some unanswered questions. NYSED's program office then had a follow-up conversation with their US ED program manager to get additional clarity, in particular, about a current subgrantee's situation. The program office thought this example might prove instructive.

This subgrantee is an LEA with an existing state afterschool grant. When the subgrantee was awarded a partial 8A award that was much smaller than what they had originally applied for, they needed to revise their workplan accordingly and revise the number of students their new funding level would allow based on their proposed cost per student. With the drastically reduced funding level, they wanted to know if they could expand their current state-funded grant program using 21st CCLC funds. What that grant was offering for programming was aligned with the goals and objectives in their 21st CCLC grant application.

We learned that this is allowed and could be handled in one of two ways:

1. Run the two programs side by side while keeping all funding, student attendance and data collection separate. It can seem like a single program to the students, but all record keeping would be maintained separately, including attendance, data collection, staffing, and all fiscal record keeping. This is how we have always understood the legislative intent.
2. The other option, we were told, was to combine them into one program provided they are using 21st CCLC funds to supplement or add to that program - either additional services or additional students or both. If choosing this configuration, all students in the larger program would be considered 21st CCLC participants. All program participants would be required to complete the 21st CCLC enrollment form, they would need to be entered into

EZReports, and APR student data would need to be collected and reported on them. The evaluation plan would need to be altered to evaluate the entire program, which now has more students and/or additional programming. The entire program would need to follow all 21st CCLC regulations, including being subject to monitoring for compliance with 21st CCLC requirements (SMVs). With this option, the subgrantee would indicate on their FS10 what 21st CCLC funds were paying for and what is being paid in-kind from the other funding source. In creating the FS10 for this option, it is important that all required key staff positions – program director, site coordinator, education liaison, data manager, fiscal manager, are included and designated as being paid either with in-kind or 21st CCLC funds. The evaluator, however, must be paid with 21st CCLC funds of at least 6% and not more than 8% of the entire 21st CCLC budget, unless the evaluator is also the data manager, in which case they could be paid up to 10%. With a now larger program that must be evaluated, it would be allowable if additional in-kind funding was used to supplement these evaluation budget percentages.

In both options described above, funding from the two sources would need to be tracked separately. In approving the subgrantee's FS10 for option 2, fiscal staff would need to be aware that some required aspects of the program were being funded by other sources.