Final Report
4/2012 – 3/2017

21ST CENTURY COMMUNITY LEARNING CENTERS PROGRAM IN NEW YORK STATE

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PROGRAM STRUCTURE & TERMINOLOGY

The Twenty-first Century Community Learning Centers (21CCLC) Program has a complicated structure. The 21CCLC Program is funded through a US Department of Education (USDOE) Grant awarded to the New York State Education Department (NYSED). So, in reference to the 21CCLC Program in New York State, NYSED is the Grantee and the USDOE is the Grantor. The federal Twenty-first Century Community Learning Centers Grant awarded to New York State is also a federal *pass-through* grant. With this type of grant, the **federal** government allows grant recipients (here, NYSED) to act as **pass-through** entities to provide **funding** to other recipients (here, local programs called Sub-grantees). The **pass-through** entity (NYSED) receives **federal funds** which it must "pass on" or which "pass **through** it" to other recipients (Sub-grantees).

Remember: Rules are Rules. Grantors always require reports on how their funds are being used and if their use is having the desired effect. Grantors also require financial record-keeping by the Grantee to ensure funds are being used according to their stipulations. As a Grantee NYSED must report to the USDOE on the 21CCLC Grant with information that is officially required by the USDOE on their management, distribution, and all use of the grant funds. As a **pass-through** entity, NYSED distributes most of the 21CCLC Program grant funds to local program Sub-grantees. Therefore, NYSED is also required to report to the USDOE on how the Sub-grantees are using their funds and if that use is having the expected positive effect. In grant jargon, this required reporting to the source of financial support is called 'compliance reporting' which often uses 'compliance measures'. In the 21CCLC Program there are two levels of compliance reporting: by Sub-grantees to NYSED; and, by NYSED to the USDOE.

Glossary

APR: Annual Performance Report, the annual reporting of numeric information to the USDOE
CBO: Community Based Organization, used in 21CCLC Program to identify Sub-grantees that are not schools or school districts.
Contractor: a person, business, or corporation that provides services to another entity under terms specified in a contract.
Focus Programs: Programs chosen by NYSED for State Evaluator close study, including document review, interview of key stakeholders, and site visit. Ten per year.
New York City Resource Center (NYC-RC): Resource Center that provides Technical Assistance to all Sub-grantees in New York City.
NYCDOE: New York City Department of Education manager for all NY City school grants.
OST: Out of School Time, programming takes place outside of the regular school day.
External Evaluation Company: State Evaluators of the 21CCLC Program in NY 4/1/2012 – 3/31/2017,
Resource Center: One of two organizations that form part of the State Management and Support Team that provides Technical Assistance to Sub-grantees.
Rest of State Resource Center (ROS-RC): Resource Center that provides Technical Assistance to all Sub-grantees located outside of New York City.
External Evaluation Contractor State Evaluators of the 21CCLC Program in NY 4/1/2012-3/31/2017.
State Evaluators: External State Evaluators
Sub-grantee: Local program funded by the 21CCLC Program, awarded through grant competition.
WSD: Within School Day, programming takes place during the regular school day.

EXECUTIVE SUMMARY

There is a clear functional relationship between well designed and thought out evaluation and a program's progression from design to implementation to successful outcomes. This tightly coupled relationship can be used as a mechanism in innovative program management and improvement, with functions ranging from providing managers with a clear understanding of 'what measuring programs has to do with program success' to the use of evaluative tools to identify program processes and to troubleshoot inefficient or ineffective program operations (The State Evaluator, 2009, *Functional Evaluation Guidelines*). The Summative Evaluation reported here is an evaluation of the management of the Statewide program delivery system for the 21st Century Community Learning Centers (21CCLC) Program in New York State. It draws on data collected and reported in detail in all prior Annual Reports, Quarterly Reports, Evaluation Briefs, and quarterly meeting updates provided by The State Evaluator to the New York State Education Department (NYSED) Managers of this program.

This report is framed using the following **State Evaluation Contract Tasks and Deliverable**:

For the NY State Evaluation, The State Evaluator was contracted to measure

(1) The effectiveness of the two 21CCLC Resource Centers; and
(2) The performance of a sample of fifty (50) Focus Programs selected by the New York State Education Department (NYSED) over the five years of the contract (ten programs in each year); and combine those findings with secondary analysis of Annual Performance Report (APR) reported program numeric information.

The evaluation's purpose was to establish through these measures:

(3) The extent to which NYSED achieved its objectives related to statewide improvement in participating students' academic achievement and behavior.

As explained earlier in *Program Structure and Terminology*, the Twenty-first Century Community Learning Centers (21CCLC) Program is a Federal Education Department Pass-through Grant awarded to the New York State Education Department. As a pass-through Grantee, NYSED awards local programs with sub-grants. Local programs are therefore referred to in this report as Sub-grantees.

This circumstance, that the New York State Education Department (NYSED) is the 21st Century Community Learning Center (21CCLC) Program Grantee, is the defining characteristic of this program. As would be expected, NYSED must provide the US Department of Education (the grantor) with required annual compliance information. The NYSED Managers have the responsibility for ensuring that those records are completed and submitted. As this Summative Evaluation Report explains, those federal compliance requirements dominate and to some extent define the role of the Sub-grantees within the New York 21CCLC System, because they are the direct source of a great deal of the required compliance documentation. NYSED has assumed that the processes to supply that federal compliance data to also provide the Sub-grantees with data they can use. This, however, has not been the case.

NYSED Managers know that supporting Sub-grantees is critical to the success of the program and the achievement of the NYSED goal that the 21CCLC Program will contribute to student improvement across NY State. For that reason, two Resource Centers are contracted to operate as part of a State Sub-

Grantee Management and Support Group (SMSG), which also includes the State Evaluator, and is overseen by the NYSED Project Manager. Recognition of the importance of the effectiveness of the two Resource Centers as critical to the success of Sub-grantees is reflected in the Resource Centers appearing as one of the primary foci of the State Evaluation. The State Evaluators found the performance of the Resource Center based system in place to guide and support Sub-grantees to be the critical factor in the degree to which the State achieved its goal of "…(measurable) improvement in participating students' academic achievement and behavior." As explained in detail in this report, the State Evaluation found that the Resource Center based system was not effective in support of the Sub-grantee programs.

Recommendations focused on how to improve Resource Center services and service delivery follow the *Effectiveness of Resource Centers* section of this report.

The State Evaluation's direct study of Sub-grantee program performance included two contracted activities. One activity was for the State Evaluators to study and visit ten Sub-grantee programs per year. If the program had more than one site, the State Evaluator was required to visit only one of them. However, the State Evaluator found it to be more informative to visit all program sites, and did so whenever time and access allowed. As explained in detail in the *Focus Programs & Annual Performance Review* section of this report, the State Evaluator used a qualitative data compilation design for the ten Focus Programs studied each year. This meant that the State Evaluators built long-term understandings of the programs rather than one-off, single state reports. The State Evaluators rely on in-depth understandings before reporting findings.

From those in-depth studies, and summarized here is the effect of allowing some of the basic requirements of Sub-grantee programs to fall away. As reported by the State Evaluator during this five-year evaluation, a disturbing number of programs have come to the point of being unable to deliver all the program components required by the 21CCLC Program. As measured, this often begins with partner schools and other cooperating community organizations being unaware of what this program is supposed to accomplish, for whom, and how it plans to achieve these results. The State Evaluator noted a pattern that is familiar to grant-funded program issues, such as whether the grant writer working outside of the program context 'wrote for points' rather than to address issues or concerns actually identified by the Sub-grantee. While the State Evaluator found that, in the case of most Sub-grantee programs evaluated during the 2012 and 2017 period covered by this report, the needs expressed in Sub-grantee applications are clearly present in the target student population, often how those needs are planned to be addressed can be a challenge to program managers once implementation begins. This is described and explained in detail in the *Conclusions and Recommendations* section of this report. In addition, based on an iterative and sustained set of findings, the State Evaluator makes a strong recommendation that NYSED set in place a program delivery system with clear procedures and performance expectations for Sub-grantees. They further recommend that these be coupled with a positive risk assessment rating for programs that meet or exceed expectations, and a firm set of consequences for those who do not.

Secondary Analysis (sic) of the Annual Performance Report numeric information (wrongly referred to as 'data') submitted to the Federal Education Department as part of NYSED's annual compliance report proved to be both complex and non-informative. Details are provided in the *Annual Performance Review (APR)* sub-section of this report.

Based on the findings summarized in this report, the State Evaluator makes the following General Recommendations to NYSED Managers regarding changes to the management and support of Sub-grantees.

Context: To reduce confusion, curtail pressure on Sub-grantees and their staff to provide programs with components not funded by the 21CCLC Program, and thus raise the overall performance of programs and program participants, clear and direct communication between NYSED and Sub-grantees with all cooperating institutions in their program context should take place early in the funding cycle and often thereafter. Contractor articulation of the same message (the Resource Centers and State Evaluator) is important, but not sufficient, to ensure that Sub-grantees and their prime client partner school maintain the 21CCLC Program in New York. All need to be told directly by the New York State Education Department Managers.

> **Recommendation:** On award of new Sub-grantee funding, and bi-annually thereafter, NYSED should hold a required new Sub-grantee meeting to which each Sub-grantee must bring: administrative and teaching representatives from each partner school, and district if appropriate; representatives from each organization represented on their Advisory Board; and relevant program staff, i.e., budget manager, program manager, and all site coordinators. This meeting should present: *An Implementation Manual; program requirements to qualify for annual funding renewal, agreements to work with NYSED and its Sub-Grantee Support and Management Team for signature; breakouts for the scope and responsibilities of each group attending, evaluation regulations and expectations, etc.*

Context: New York is a large state with 55,000+ square miles. In addition to compiling and reporting on compliance, the New York State 21CCLC System needs to expand their focus from activity focused compliance to measurable results.

> **Recommendation:** To facilitate that shift, the program should be proactively managed. To do so, there needs to be a management support team dedicated to supporting Resource Center efforts to maximize the use of their resources and to support their provision of pro-active program interventions. That support team could work with the State Evaluators to operationalize resources when they identify cluster issues, individual issues, or instances of best practice. A great deal of good work is happening in New York and the 21CCLC System should build on it.

Context: The external State Evaluators believe that it is impossible for NYSED, based in Albany and staffed at present levels, to supervise the field to the extent necessary to ensure the support necessary to facilitate the positive performance of all Sub-grantees is provided efficiently and effectively. Having discussed this with the NYSED Managers, the State Evaluator is aware that to hire more NYSED staff to support this program through the civil services would entail a great deal of time and questionable results, without the ability to place them 'in the field' throughout the State, which is what is necessary.

> **Recommendation:** While the discussion at NYSED goes forward on the issues of increased staff for Management of the Sub-grantees and the RC Support of them, we recommend a Management Support non-bid contract be awarded for these supporting services immediately.

SECTION ONE: THE NEW YORK 21ST CCLC SYSTEM

This is a Summative Evaluation Report of the management of the 21st Century Community Learning Centers Program (21CCLC) by the New York State Education Department. The Summative Evaluation reported here is an evaluation of the management of the Statewide program delivery system for the 21st Century Community Learning Centers (21CCLC) Program in New York State. It draws on data collected and reported in detail in all prior Annual Reports, Quarterly Reports, Evaluation Briefs, and quarterly meeting updates provided by The State Evaluator to the New York State Education Department (NYSED) Managers of this program. This document constitutes the final report by the State Evaluator on findings from a five-year contract, which ended on March 31, 2017.

This report is framed using the following **State Evaluation Contract Tasks and Deliverable**:

The State Evaluation measured:

- The effectiveness of the two 21CCLC Resource Centers; and
- The performance of a sample of fifty (50) Focus Programs selected by the New York State Education Department (NYSED) over the five years of the contract (ten programs in each year); and
- To combine those findings with secondary analysis of Annual Performance Report (APR) reported program numeric information,

With the purpose to establish through those measures:

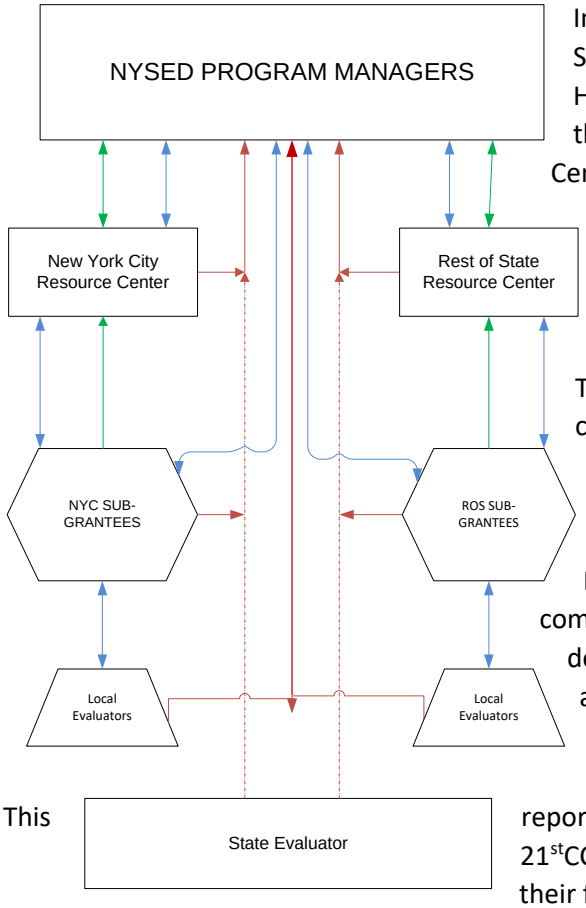
- The extent to which NYSED achieved its objectives related to statewide improvement in participating students' academic achievement and behavior.

The New York State Education Department is the pass-through grantee of the 21CCLC Program in New York. Although this characteristic defines the program context in New York, and thereby the operational context of the State Evaluation, the inefficient and ineffective functioning of the organizational system in place to guide and support Sub-grantees was found to be the critical factor in the degree to which the State achieved its goal of "…improvement in participating students' academic achievement and behavior."

This circumstance, that New York State is the grantee, is the defining program characteristic underlying all the explanation, data-based information, and any conclusions and recommendations contained in this, and all other State Evaluation reports that have been prepared by The State Evaluator for the New York State Education Department (NYSED) during the period of the State Evaluation.

The period covered by this report is April 1, 2012 through March 31, 2017. This period included the end of two Sub-grantee funding cycles, and the start and all but three months of a third, four-year funding cycle for Round 6 Sub-grantees, which will end June 30, 2017.

NY's System and Its Sub-Grantee Management & Support Group (SMSG)



In New York, the State Evaluator is a part of NYSED's Sub-Grantee Management and Support Group (SMSG). Headed by the NYSED Program Manager, in addition to the State Evaluator, the SMSG includes two Resource Centers. The New York City Resource Center (NYC-RC) works only with funded programs within the boundaries of New York City, and the Rest of State Resource Center (ROS-RC) which provides services to all other programs.

The Assumed Interaction Diagram on the left shows the components of the 21CCLC System in New York State, including all elements: Sub-grantee Management and Support Group, Sub-grantees, and their local evaluators; and, NYSED Program Manager. The 'State Evaluation Assumed Interaction' pattern among its components was assumed by the State Evaluator when designing the State Evaluation as is shown via the arrows.

This report is organized using the components of the NY State 21st CCLC System. This allows the State Evaluators to link their findings to the system's components and its processes, both those that were expected and those unexpected that were discovered. By reporting on the System as it operates in comparison to how it was expected to operate, the State Evaluators hope to clarify a very complex program, with multiple general required components, operating in a large, diverse state, and to facilitate the consideration and use of the findings and recommendations made here.

The SMSG: The State Evaluators

The external State Evaluators are an independent, outside company specializing in policy research and sponsored program evaluation. The Report presented here completed all required tasks of a five year evaluation contract. As this report will explain, the five years of the present contract was a period of some shift and change in the program. Some of that shift and change directly affected the parameters of the contract framing this evaluation, and are noted in this report when it is appropriate to do so.

The Sub-Grantee Support Group: The Two Resource Centers

Evaluation findings of the effectiveness of the two 21CCLC Resource Centers are reported in some detail in this report. The two Resource Centers began their contracts around the same time as the State Evaluators, with the Rest of State Resource Center's contract beginning just prior to the State Evaluator's, and the New York City Resource Center's contract beginning a few months later. The

resource centers were each responsible for delivering the same services to Sub-grantees located in their geographic area of responsibility. In addition, the ROS-RC's contract had the additional required task to establish and maintain a Statewide program website. Although the remaining scopes of services for the Resource Centers were the same, their operational context was quite different.

For example, using the location of the Sub-grantees in the Round 6, 2013-2017 funding cycle the 'coverage' area and number of programs served for each Resource Center is presented on the adjacent table. This illustrates that there are significant differences in the RC contexts. As the table indicates, the NYC-RC had less distance to travel to programs, for example, and only one public school system with which it had to interact. The ROS-RC had more than 177 times the area covered by the NYC-RC, and more than fifty public school systems working in the programs for which they were responsible, with less RC staff. The staffing level of the two centers is also discussed as important to the performance of each center. With a smaller and more compressed catchment, and 2.5 full time staff, the NYC-RC had also contracted out all their required services except for a number of Monitoring Visits. The ROS-RC only contracted out for the development of the online support website.

Resource Center	Square Miles	Number of Programs	Staffing Level
New York City	305	71	2.5
Rest of State	54,250	58	2.0
New York State Total	54,555	129	N/A

Performance of Sub-Grantee Programs

As well as monitoring the effect of the work of the two resource centers on the NY State 21stCCLC System, the State Evaluators looked at the performance of the Sub-grantee programs with annual required tasks and other sources of information (both contractually required and emerging as the contract progressed) presented in this report.

In the second contracted area that the 21CCLC Program State Evaluation studied was the performance of Sub-grantee programs. The contracted measures were: (1) secondary analysis of the data-based information reported by Sub-grantees into the Federal Department of Education's program information collection system; and, (2) studying a sample of fifty (50) programs each selected in consultation with NYSED over the five years of the contract (ten programs in each year).

Secondary Analysis of the Annual Performance Report (APR)

All program data is of local origin regardless if it is reported back to the local level or upwards to the State or federal level. Data is an active source of information across all three levels of report in this program context.

New York State does not have a Statewide Data Collection System in place for this program. This might be because until the new Annual Performance Report (APR) was introduced in the 2015-2016 program year the State compliance reporting to the federal funders did not necessitate one. Also noted by the State Evaluators, NYSED has shown no interest in collecting its own data from Sub-grantees. That situation has meant that the State Evaluator has not had access to individual student data (on program attendance, program component attendance, social-emotional development, academic performance, etc.) which would allow the State Evaluation to compute statewide interim and final program effect measures. For that reason, there are no definitive findings relative to student growth or performance and any measures regarding the effectiveness of the program treatment(s) they received in this report.

The State Evaluator did the 'secondary analysis of APR data' as required by the contract. The compilation of already analyzed data such as the data-based information entered into the Federal Annual Performance Report (APR) proved to be inappropriate for any attempts to evaluate the levels of program success when success is defined as a positive shift in student performance in the programs and in school. This was not possible because the data based information in the APR was not 'linked'. 'Linked' information associates a predictor (for example, individual or clustered student attendance at the 21st CCLC program) and an effect (that student's or cluster's performance in one or more school subject areas).

Because the APR numeric information was not 'linked', it was not possible for the State Evaluators to calculate if the program had any effect on individual students, or clustered students' learning outcomes, for example. Because data was aggregated (totaled, averaged, put into calculated frequencies, etc.) before being entered into the system, the secondary 'analysis' was just a more detailed cut of numeric information (by rural versus small city programs, for example), and not analytic. And because attendance by individuals (a predictor variable) could not be linked to their performance on State tests (the outcome variable), the State-level secondary compilation of data-based information could indicate only a general Statewide effect, but could not identify programs that were having no effect, limited effect, or great effect on student performance. As a result, this has left New York State without a defensible set of *best practices*, which has had a sustained restricting effect on the program's support of promising practices in general, and the resource center support system's options in particular.

Data from Required Site Visits

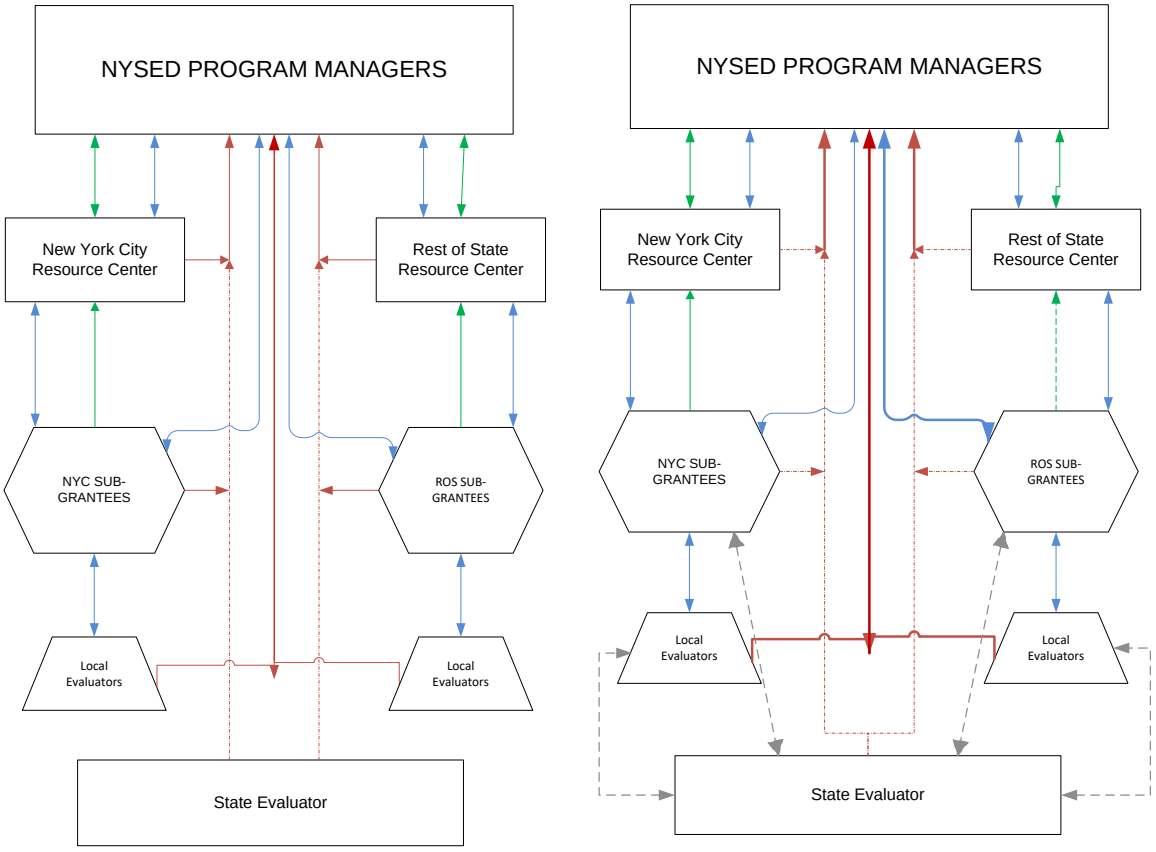
To optimize the utilization of the data-based information collected from the more than fifty programs receiving in-depth study and site visits in this State Evaluation over the five years of this contract, the State Evaluators used an iterative sample of individual program practice and performance design. This design also gave the State Evaluators the ability to identify some thus validated *best practices.* Iterative sampling in case study research methods is a process whereby evaluation researchers move back and forth between choosing cases for each data collection period and engaging in preliminary analyses of the cases sampled to inform the choices made for the next data collection period's sample. In this way,

the State Evaluation used what emerged from the data analyses to inform subsequent sampling decisions, and to build a rigorous structure into the annual Sub-grantee study requirement.

The State Evaluators used each annual ten site visit cohort group's initial data review and visit as their induction into the iterative sample used for this part of the State Evaluation design, moving from exploratory (pre-site data review) to descriptive (on site focused interviews, review of program delivery structures and management materials) and finally using data from the combined site datasets within the full iterative case study as explanatory.

Discussion and findings are provided in the *Focus Programs* sub-section of this report.

Functioning of the In-Place SMST With the NY 21CCLC System



State Evaluation Observed & Measured Interaction Among 21st CCLC Program Component Groups

KEY

Interactions among the NY State 21st CCLC Program Component Groups are diagramed as follows:

Blue Double Arrows: indicate interactive communication Sub-grantees to RC, RC to NYSED, and Sub-grantees to NYSED as well as between Sub-grantees and their local evaluator.

Green Arrows: indicate Sub-grantee question or request for information forwarded by RC to NYSED.

Red Arrows: Indicate Collection and annual reporting of evaluative information.

Broken Red Line: State Evaluation was responsible for data collection only from 10 Sub-grantees per year and using two RC site visits to each RC per year.

Broken Grey Line: Indicates two-way interactions between local evaluators and the State Evaluation Team and Sub-grantees and the State Evaluation Team. [This also resulted in networking among evaluators.

Not shown: State Evaluation Secondary Analyses of NYSED Federal Reporting content, annually.

The New York State Education Department has established a three component Sub-grantee Management and Support Team to support the NY 21CCLC System in New York. Headed by the NY State Coordinator, in the field, there are two Resource Centers, responsible for Monitoring Visits, provision of general Technical Assistance to Sub-grantees, and delivery of specific professional development in-service activities. The RCs are also responsible for planning and hosting program meetings for their sub-grantees. The State Evaluators were the third organization in the Sub-Grantee Management Support Team.

However, there is a universal circumstance often noted by evaluators that no program component or structure implements exactly as designed. The structure for this program has been no exception. The 'as observed and measured' diagram here is based on how the State Evaluators' evaluation of the management structure in New York has been shown to interact among themselves and with the Sub-grantees. These interactions are based in part on the NYSED as designed intent of the SMST, and in part on 'circumstances', such as: past NYSED practices; the sustained past behaviors of legacy programs (programs that have had prior 21st CCLC funding); and, other often unforeseeable occurrences.

We have used grey, broken lines to indicate the connections between the State Evaluators and local evaluators and some Sub-grantees as these were not a part of the State Evaluator's contracted services and were provided to the program as a service outside of this contract to evaluation colleagues. Support of local evaluators grew out of NYSED's decision to require local evaluators to complete rigorous local level evaluation as part of their management plan for sub-grants awarded during this evaluation contract.

The 'Management & Support Team' consisted of the NYSED Program Manager, both Resource Centers (New York City and Rest of State) and the State Evaluator. The State Evaluator responsibilities included monitoring the RC delivery of professional development and technical support to programs, as well as completing assigned Monitoring Visits. The evaluator responsibilities also included annual site visits to ten selected sub-grantees each year and secondary analysis of the data reported in the Federal Annual Performance Report.

The focus of the management of this program by the New York State Education Department's managers is on the State's grantee compliance reporting to the Federal Education Department. Two things, completion of the Annual Performance Report (APR), and compliance audits through program monitoring are required as part of that grantee compliance reporting that involve direct interaction between NYSED and the Sub-grantees.

In the analyses of the data collected during the five years of the State Evaluation of the 21st CCLC Program, the State Evaluators treated both the assessment of the role and functions (effects) of the Resource Centers and the evaluation information collected on the Focus Programs as predictors (Pre-conditions, Capacities, and Outputs). The analyses assessed if they strengthened and/or supported the expected result, i.e., the State's success in reaching its objectives related to statewide improvement in participating students' academic achievement.

To that end, this report summarizes the State Evaluation findings regarding the New York State 21st Century Community Learning Centers (21CCLC) Program, explains how those findings have been reached, and proposes recommendations to support the strengths this evaluation research study has identified, and to address any next steps in the continuous improvement of this program in New York.

Limitations of This Report

The State Evaluator is reporting here on the efficiency and effectiveness of the New York State Education Department's management of the 21st CCLC Program in New York State. Much of the data reported on in this report was collected, analyzed, and reported in prior contracted quarterly and annual reports. In this report, when possible individual annual results have been combined and/or summarized across the five-year period of the evaluation or the four-year period of the Round 6 Sub-grantee Cycle. This report also refers to the State contracted external evaluator's practice of annual cumulative review of data grounded information when possible over the prior reporting on this evaluation. Here this accumulation is completed, and was used to strengthen evaluator confidence in the unfolding formative program parameters and emerging summative predictions of effect reported here.

Please Note: Although primary subjects of this evaluation, the Resource Centers were evaluated by their own external evaluator. The State Evaluation focused on the efficiency and effectiveness of the management and support given to each Center by their parent organization and how that affected each center's efficiency and effectiveness. In the case of the Rest of State Resource Center the contractor was Capital Region BOCES. In the case of the New York City Resource Center the contractor was the New York City Department of Education. Because the Resource Centers contracted independently with their external evaluator, the State evaluators did not have access to any of the data, reports, or instruments developed by that evaluator. As this report focuses on how the Resource Centers functioned as effective parts of the Management and Support Team, that supplemental information was not necessary. However, recommendations for strengthening and improving RC support are limited to those circumstances for which the State contracted external evaluation company has data.

Other sources of information that were not shared with the State Evaluators are noted in the appropriate point in the context of this report.

Purpose of This Report

In this report, The State Evaluator has focused on clear, fair, and proven measures of the quality and effectiveness of program management. This report discusses both the strengths of the 21st CCLC Program's State level management and some points that could use some attention. The primary purpose of this report is to provide the New York State Education Department with clear recommendations to maintain 'what works' and to implement positive changes to 'what could work better'. The results of this evaluation include actionable information as the basis of an effective management strategy for NYSED as the grantee and an expanded and strengthened Support System for Sub-grantees.

SECTION TWO: EFFECTIVENESS OF THE RESOURCE CENTERS

As part of their Management and Support Team, NYSED contracted for two Resource Centers. The New York City Resource Center (NYC-RC) worked only with programs within New York City. The contractor for the NYC-RC was the New York City Department of Education (NYCDOE). The Rest of State Resource Center (ROS-RC) worked with all other programs in the state. The contractor for the ROS-RC was Capital Region BOCES located in Albany, NY. The NYC-RC had a staff of 2.5 and the ROS-RC had a staff of 2.0. It is surprising that the NYC-RC, with responsibility for 71 programs spread across 305 sq. miles had a higher staffing level (at 2.5) than the ROS-RC (at 2.0) with responsibility for 58 programs spread across 54,250 sq. miles. In addition, when the Director of the ROS-RC took maternity leave, the contracted agency did not place a substitute in her position. Just following that period, the second staff member left the ROS-RC so that the Director's return continued the single staff circumstance of the Center, continuing until the end of their contracted services. The NYC-RC was always officially fully staffed. The level of staffing in each of the RCs is pertinent to most of the points that will be made in this report. The State Evaluation's contractual requirements included measurement of: "The effectiveness of the two 21CCLC Resource Centers". In the State Evaluation's evaluation plan, that measurement was designed to be carried out annually, and those findings to be combined each year over the five years of the State Evaluation contract to provide clear, actionable data-based information on specific activities and overall progress in achieving their purpose by each of the Resource Centers. Clear annual reports on program activity within running record compilations were provided to the NYSED Management Team, focusing on the following contracted areas of Resource Center responsibility. The State evaluation assessed:

1. The contribution to NYSED management of the Monitoring Site Visits performed by the Resource Centers (as per Request for Proposal for each contract, 15 visits annually by the ROS-Resource Center and 25 visits annually by the NYC-Resource Center – or their sub-contractor);
2. The effectiveness of the web-based support system created and maintained by the ROS Resource Center;
3. The effectiveness of the portion of statewide Technical Assistance provided to Sub-grantees by each of the Resource Centers;
4. The effectiveness of the professional development provided by each of the Resource Centers.

Contribution of Monitoring Site Visits to State Management

'Monitoring Visits' in the 21st CCLC Program are required reviews of funded Sub-grantees for compliance to federal program requirements, NY State laws and regulations, and NYSED requirements. Because the NYC-RC is within the NY City Department of Education (NYCDOE), NYCDOE Sub-grantees' monitoring visits were done by an outside contractor. NYC-RC staff visited all the rest of the NYC Sub-grantees for monitoring purposes except one which was visited by NYSED staff. In the case of the ROS-RC, they have completed thirty-two visits alone, and five visits accompanied by NYSED staff. NYSED staff completed a further thirteen ROS Monitoring Visits without ROS-RC staff.

Please again note that the State Evaluator's contract for this evaluation ended before the June 30, 2017 end of the Round 6 sub-grantee funding cycle. In summary, since the beginning of Round 6 until March 15, 2017, all of the seventy-one NYC Resource Center Round 6 Sub-grantee sites have been visited. At

the end of March 2017, fifty of the fifty-eight ROS Round 6 sites had received monitoring visits. Of the seventy-one NYC-RC Round 6 sites, fifty-three (75%) were found to be non-compliant for at least one issue out of a possible forty-nine assessment areas, and eighteen (25%) were compliant. In the case of the fifty ROS Round 6 monitoring visits logged through March 2017, information is available on forty-three of them. Of that forty-three Sub-grantee programs, thirty-five (81%) were non-compliant in at least one area out of a possible forty-nine assessment areas, and eight (19%) were found to be compliant.

The State Evaluators note that the NYC-RC was contracted to complete twenty-five either monitoring or Technical Assistance review site visits per contract year. The NYC-RC completed four years of their five-year contract due to initial contract hold-ups, so that they should have visited, for either monitoring or Technical Assistance review, one hundred sites. The NYC-RC contracted with the Children's Aid Society (CAS) for Technical Assistance visits. This is discussed in that section of this report.

In the case of the ROS-RC, they were contracted for fifteen site visits per year. In the four-year period of the Round 6 Sub-grantee contracts that would equal sixty site visits for monitoring or Technical Assistance review, and for the first year of their contract an additional fifteen monitoring or Technical Assistance review visits totaling seventy-five contracted site visits.

Further discussion of non-monitoring site visits by the Resource Centers can be found in the *Effectiveness of Resource Center Technical Assistance* section later in this report.

We report the results of a telephone interview used to validate findings from across the five years of the State Evaluation. The information from these August 2016 telephone interviews agreed with the evaluation information collected during the State Evaluation regarding the Sub-grantee understanding of the purpose of the Monitoring Visits and their experience with those visits. The State Evaluator conducted a brief interview of 15 randomly selected program sites (6 from Rest of State and 9 from NYC) that had received a monitoring site visit during the July 2015-June 2016 program year. The State Evaluator sent an email notification explaining the purpose of the phone interview to the project directors, informing them that they would receive a phone call within a week of receiving the email. Of those fifteen program sites, seven (47%) project directors (4 ROS – 3 NYC) responded.

The questions that were asked during the phone interview included whether the project director had received a monitoring site visit over the past program year. If answered in the affirmative, they were asked:

- In general, how was the experience of the visit?
- Had it been helpful to the project director to help to complete the monitoring site visit protocol within the visit context?
- How long in duration was the visit (including, but not restricted to, the use of the protocol)? and,
- Are there any things that would have made the experience better?

The responses in Table 1 on the next page indicate that each monitoring visit went well and was found to be helpful for the newer project directors. On average, each monitoring visit took between 1.5 and 3.0 hours, with most of the time spent on going over the protocol and looking over program documentation. Newer project directors noted it would be helpful to have the same process repeated in every year of their grant as it would be useful for them to look through their program documentation with the resource center staff. However, experienced project directors would prefer that NYSED

streamline this process using desk audit or an online review, and noted that they believed it should be completed during the first program year.

Experienced project directors felt that the initial review gave them 'the standard' needed. They wanted the RCs and NYSED visitors to spend more time observing and commenting on their programs instead.

Table 1– Monitoring Site Visit Validation 2015-2016

ROS NYC	How was the visit?	Useful or helpful at all?	How long was the visit? Using the protocol?	Anything to make it better?
ROS, SD	It went well. I started the program director position a few months ago, but was present during the visit.	It was helpful. It helped me as a new director to know which tasks must be done.	About 2.5 hours. 1.5 hours was spent going through the protocol.	As a new director, I would prefer to do this again because it's better to go over everything in person.
ROS, CBO	Went well. The process seemed difficult and overwhelming in advance. It was a good conversation	Visit was helpful to do an inspection in making sure we had everything in place. We're typically well-prepared for things like this.	3.5 hours for the entire visit. 2 hours was spent on reviewing paperwork.	It would be easier to skew the paperwork portion before the resource center or NYSED visits us. It'll be more beneficial for everyone to spend more time seeing our program and it'll save us time.
ROS, CBO	Not sure, I'm new in the position. Only familiar with the report and what needs to be done.			
ROS, SD	It was all right. I enjoyed the face-to-face meeting with the resource center staff to have documents and the protocol explained.	Useful as a reminder.	The entire visit was 3 hours. Going through paperwork took 2 hours.	Would like the visit to be spent on visiting the program.
NYC, CBO	It went well. I received an email in advance to getting everything together.	It was useful.	It was 3 hours long. The fiscal section took a while.	Streamlining the process would be great using an online review or desk audit. It's time consuming and a distraction for programming to go over a protocol for a long period of time.
NYC, CBO	Good experience. There are a lot of little things that can only be shown in person. I had the impression that the resource center was too busy to go through all of the documents, especially the small things.	Great tool for ensuring compliance.	About 2.5 hours for the entire visit, 2 hours of it was going through the protocol.	This visit should've been done in Year 1, at least during start-up. It would be nice to have spent more time looking at my program. A process like this needs better timing. I learned about the monitoring process by coincidence after attending a workshop at the kickoff.
NYC, CBO	It was good. I'm familiar working with the NYC resource center team from other schools (outside of 21CCLC).	It was helpful. The resource center gave me a lot of good advice.	The visit took quite some time, don't really remember.	Would like to see the thoroughness again, especially when it comes to maintaining documentation. It has helped me with other schools outside of 21CCLC. It would also be nice to do this during the 2nd year or earlier to have more impact (within reason).

Site Visit Contribution to State Management

The Monitoring Visits to Round 6 Sub-grantees took more than three years to complete. The records available for this report indicate that of the seventy-one New York City programs, when visited 75% were found to be 'non-compliant' in at least one out of 49 assessment areas. In the case of the Rest of the State, of the forty-three visits recorded 81% were 'non-compliant'. The Monitoring Visit Protocol is a review of basic, required records that show the program being reviewed is compliant with federal and State requirements as well as some 'best practices' that the State considers evidence of program quality. In the best case, all funded programs would be reviewed within the first six months of funding.

Delayed Monitoring Review also does not allow NYSED Managers to use the information thus collected to inform their management of the Sub-grantee program. Data has a 'sell-by' date, and data received too late has the effect of weakening the fields' perception of the efficiency of NYSED management, and often makes 'mid-course correction' superfluous.

Recommendation: Monitoring Site Visits

NYSED should consider a time sensitive plan to complete all Monitoring Visits within six months of funding award. To facilitate that goal, the State Evaluators recommend that the bulk of the content of the Monitoring Visits should be done as a desk audit or online review, thus freeing valuable time to visit and work with the non-compliant programs, and to visit those who are compliant as Consultation Visits (see following section of this report).

A Working Definition of Technical Assistance (TA)

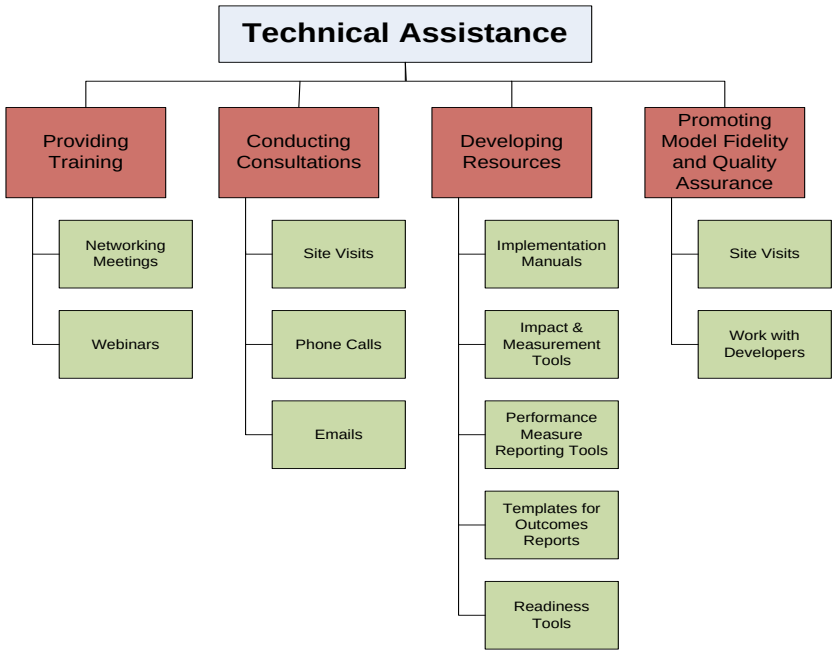
As noted in their contracts, the State Monitoring Visits were not categorized as the provision of Technical Assistance (TA) to the Sub-grantees. The remainder of this section of the report on the performance of the Resource Centers focuses on the three areas of Technical Assistance included in their contracts. Those areas are: (1) the development, implementation, and support of the web-based support system; (2) the provision of telephone, e-mail, and in-person targeted support to Sub-grantees (self-identified, or identified by NYSED, the State Evaluators, or the RC); and, (3) the provision of professional in-service training (professional development) for Sub-grantee program administrators and/or staff.

A general definition of *technical assistance* is offered by Barton as "… the timely provision of specialized advice and customized support to resolve specific problems and increase clients' capacity."[i] The term *capacity* when used in this context is generally defined as: "the process by which individuals, organizations, institutions and societies develop abilities (individually and collectively) to perform functions, solve problems and set and achieve objectives."[ii] The same author clarifies what is meant by *building capacity*. Specifically, 'capacity building' is multi-leveled work, that should result in:

- The development of individuals' skills and conditions to ensure that skills are used productively;
- The development of effective organizations within which individuals can work;
- Strengthening of interrelationships among entities; and,
- The development of enabling environments for addressing issues across societal sectors.

Developing the capabilities of individuals is not sufficient to create the capacity to identify problems and sustain solutions. The purpose of TA is to increase capacity. Capacity development, therefore, is an expected result of technical assistance.

The EPIS Center[iii] at the University of Pennsylvania provides the detailed diagram of Technical Assistance by Task-model for TA below. Each NY 21CCLC Resource Center was contractually responsible for providing Technical Assistance (TA) to all Sub-grantees in their service catchment. However, they were not responsible for all the elements in the EPIS Model. By contract, the RCs were responsible for in-service training/professional development, both in person and via online seminar, as in the first category of the EPIS Model "Providing Training" but the RCs were not responsible for holding networking meetings, for example. Sub-grantee Meetings were held during some Statewide Meetings (discussed in detail later in this report), but provision for 'networking time' among Sub-grantees at those meetings was limited. The monitoring site visits for which the RCs were responsible were regulation compliance checks, and not meant for conducting TA consultation as listed in the second category of the model.



Few consultation visits were reported to the State Evaluator by either RC. When asked about phone calls or emails between the RC and Sub-grantees, most originated with the Sub-grantees, and both RCs reported that most contacts were regarding administrative procedures, especially as they related to budgets.

Neither the RCs nor the State Evaluators were contracted to perform any of the tasks listed in the "Developing Resources" section of the EPIS Model. During the five years reported on here no Implementation Materials were made available to the Sub-grantees as a published document or set of documents, although individual sets of instructions regarding regulations and procedures were always available from the NYSED website. At the time of this writing that is still the case.

The State Evaluator had worked with the NYSED Management Team during their prior contract as State Evaluators to this program to establish local evaluation expectations that would provide necessary 'report-out' data-based information to sub-grantees as well as performance-based program management information to them. As the Round 6 sub-grantees began their work it became clear that some of the local evaluators needed support in their efforts. As a private unpaid service to the local programs, beginning with informal Local Evaluator Meetings, over time the State Evaluator developed and maintained a Statewide Local Evaluation Network in addition to their contracted services as State Evaluators. Using that network the State Evaluator, with the help and support of local evaluators, identified and circulated four of the five resources listed in the EPIS Model under 'Resource

Development'. They were circulated by the State Evaluator on their own behalf and are: Impact and Measurement Tools, Performance Measurement Tools, Templates for Outcome Reports (on Short-term and Interim Results), and Logic Model Guidelines as a Readiness Tool.

There has been no attention to the final category in the EPIS Model: Promoting Model Fidelity and Quality Assurance. The following recommendation is made to address this and other areas of the model which are not now addressed by New York.

Recommendation: Plan to Improve Technical Assistance

The State Evaluators recommend that a committee of representatives drawn from NYSED Managers, Resource Center Directors, and Sub-Grantee Managers review the Technical Assistance Framework provided here. Starting from that point they should be tasked with identifying the components necessary to provide high quality and in-depth TA, and then plan, design, and implement capacity building TA for the Sub-grantees in New York.

Effectiveness of the Web-based Support System

The State Evaluation has collected data from various sources in determining whether the 21st CCLC web-based support system was useful to NYSED managers, the State Evaluators, and/or Sub-grantee program staff across the state. Data-based information reported here was collected using: informal telephone conversations; in-person formal interviews; and, formal focus groups with program staff throughout the state. Cross informant validation was built into each of these interactions, and they were formally verified when speaking with the local evaluators during the Regional Evaluator Meetings. The State Evaluators asked whether the website had been useful for providing information, training, and/or technical assistance.

As noted in all previous annual reports by the State Evaluators, Sub-grantee program staff and local evaluators continuously indicated that as an online support system the ROS-RC supported program website was not useful because:

- It was not searchable;
- It was not able to provide any online training;
- It did not act as a repository for past professional development training materials and guides;
- It did not provide an environment in which they could interact or network with other 21st CCLC programs;
- It did not provide up-to-date information to the field, for example, details of the annual meetings held for Sub-grantees, which were hosted by each Resource Centers.

Examples of these criticisms were communicated in each Annual Evaluation Report. Examples include:

- A new project director reported struggling with linking their 21st CCLC program to local organizations in their community and was using various online sources through Google search because the NYS 21st CCLC Support Website did not contain information or training materials on community outreach strategies.
- This same project director reported a need to have the ability to network with other project directors for advice and ideas using an online platform such as Facebook.
- One site director (an assistant principal) was not aware that the 21st CCLC website existed and had been searching for social and emotional support training strategies for their program staff through Google searches.

- Various program staff from throughout the State and several local evaluators also commented on not being able to register to attend the State 'Kick-off' and 'Close-down' conferences (hosted by the Resource Centers) through the website. This was because the site development platform did not support the level of functionality necessary. In addition, the 'Resources' section of the website was not searchable, also because of the website development platform used in the sites development.

The purpose of the online support was to save time and effort while supporting high quality programming. It did not do so.

The State Evaluators note that the online support system needs to be interactive so that program staff can participate in trainings and be able to offer trainings of their own based on their own site-related expertise. It is also important to facilitate networking across programs, including an online forum space where registered program staff can discuss, pose questions, and, share and reflect on program related ideas. Open-source platforms, such as MOODLE, can provide these capabilities with little cost.

Recommendation: Improve the Online Support System

The Online Support System must be accessible and functional in both directions: out to the Sub-grantees and in from them. Sub-grantees should be encouraged to share their experiences, promising practices, operable assessments, and other program system information with one another in a facilitated (and edited) program environment. The utilization of social media outlets would certainly be helpful in this endeavor as well, such as a central Facebook page dedicated to NYS 21st CCLC programming.

Effectiveness of Resource Center Technical Assistance to Sub-grantees

The State Evaluator tracked the technical assistance provided to Sub-grantees throughout the five years of this evaluation (April 1, 2012 – March 31, 2017). To do so, State Evaluation Researchers questioned site visit staff during the fifty-three program site visits carried out as part of the State Evaluation, they interviewed Sub-grantee evaluators during Regional Evaluator Meetings held by the State Evaluators, in addition to formal interviews of local evaluators during the fifty-three program site visits. The company also surveyed program administrators using a long form needs assessment survey and periodic short form quick response questionnaires. Finally, a representative sample of program administrators were interviewed by the State Evaluation Researchers in a "Check-Back" validation in the Summer and Fall of 2016.

Please note, Technical Assistance is different from Monitoring Visits, although many monitoring visits resulted in some technical assistance being provided, here we discuss only those visits to sub-grantee sites that were made solely to assess and provide technical assistance to the sit. This discussion is regarding Technical Assistance. In summary, through compilation and analysis of all data collected, the State Evaluator found few programs that reported any direct, in-person contact solely for the purpose of seeking and/or receiving Technical Assistance, either pro-active or reactive, provided to them by the Rest of State Resource Center. One State Evaluation site-visit program director reported that she had asked for an in-person visit to help with the implementation of their program, and was told that, because the program was located 150 miles from the ROS-RC offices, a site visit was not possible. In the NYC-RC catchment the pattern of evaluative information indicated that NYC Department of Education (NYCDOE) funded programs did have interactions with Resource Center staff, however not necessarily for the sole purpose of seeking and/or receiving technical assistance. Other than New York City

Department of Education sub-grantees often did not know that the NYC-Resource Center functioned as a resource to them as well.

The reader must remember that the NYCDOE is the only public school system with which the NYC-RC interacts, either as a funded sub-grantee or as the partnering school 'district'. To many in the field in the City the fact that the NYC-RC staff are 'from' the DOE is a primary fact, that they are the NYC Resource Center for the 21st CCLC Program is a secondary fact. When asked, most non-DOE sub-grantees reported that their only experience with the NYC-RC was when they were visited for their Monitoring Visit, which they reported as a positive experience. Most also reported no further direct contact from the NYC-RC, although the majority attended the 'Kick-off' and 'Close-down' annual meetings hosted by the NYC-RC, for example. The State Evaluators found that a clear articulation of the role, responsibility, and organization which they represent (the New York State Education Department) should be clearly stated, and often repeated to all sub-grantees.

As stated earlier in this report, each Resource Center was contracted for a set number of visits to Sub-grantee sites per year at twenty-five per year for the NYC-RC and fifteen per year for the ROS-RC. As also stated, the required Monitoring Visits each RC performed were seventy-one for the NYC-RC and thirty-nine for the ROS-RC. The actual count of those contracted in-person interactions with Sub-grantees proved difficult to track. The NYC-RC sub-contracted to the Children's Aid Society of New York (CAS) for the non-monitoring Sub-grantee site visits. State Evaluators interviewed the contract's manager at CAS on three occasions over the four years of their involvement with the NYC-RC. The CAS manager indicated that their staff visited sites that they chose for reasons she could not identify, and that the usual intervention recommended for sites that were believed to need support was to provide a site-tailored version of one of the CAS professional development modules. Despite repeated requests for the records of which sites were visited and which modules were delivered, those records were never provided to the State Evaluators. State Evaluators also approached the Director of the NYC-RC and was told he also had had little success in procuring any detailed records from CAS.

Beginning in the 2014-2015 program year, the State Evaluator began directly collecting information on the CAS services provided to Round 6 Sub-grantees by: asking the programs visited during the site visits the State Evaluator was required to make about their experience with TA visits; discussing the need for TA with the local evaluators from New York City in the Semi-annual Regional Evaluator Meetings the State Evaluator held at Hunter College; discussing the TA requirement with the NYC-RC director and staff during formal State Evaluation visits, twice per program year; and, through an annual, in-depth interview of the CAS contract manager. These efforts yielded several reports of CAS consultants visiting sites. However, when the State Evaluator contacted each site in question and asked about the delivery of in-service support to the staff at the site, very few site coordinators or project directors indicted that they had accepted that support. The key finding was that there is a need for professional development support to the sub-grantees, but that the 'typical' out-of-school time professional development did not match the sub-grantee's needs. Because of its combination of academic outcomes with other, more common OST outcomes, the 21st CCLC program is more complicated to design, deliver, support, and evaluate and professional development options provided must reflect this complex environment.

Requests for the records from the ROS-RC met with assurances that the two staff members were answering phone and email requests for information and that field visits were not necessary. The State Evaluators reviewed the annual Work Plan for the ROS-RC and noted that their Plan for 2014-2015 had

been altered to count any extra time spent at each Monitoring Visit as counted towards their contracted Technical Assistance site visits. The State Evaluators asked the NYSED Program Coordinator if this change in the Work Plan had been approved, and it had not. Steps were taken to clarify this with the ROS-RC staff and their supervisors. While site visits did take place, the State Evaluators have seen no proof of completion of all contracted TA services by either Resource Center.

Summer 2016 Check-Back Interviews of Project Directors on TA

To cross check the pattern of information collected to measure provision of Technical Assistance by the NYC-RC and the ROS-RC, the State Evaluators conducted telephone interviews of a random sample of sixty (60) project directors with thirty-six (36) of them participating (28% of all programs, 60% of the sample) in late summer and early fall 2016. The purpose of the interviews was to cross check the established response pattern regarding the delivery of Technical Assistance support by the Resource Centers. The interview sought project director feedback on whether they had received any Technical Assistance, and if so, if it had addressed their need and been effective. This task was undertaken by the State Evaluators to validate the pattern of findings as to whether the Technical Assistance that was provided by telephone, email, and infrequently in person by the Resource Centers was helpful to program administrators, and if there were further TA services they would have found helpful.

One thing became clear as the interviews progressed: Project Directors had a broad (and somewhat incorrect) definition of Technical Assistance, seeing it as mainly related to the completion of required reporting. The responses to the interview questions fell into three categories: replies referring to the Sub-grantee's relationship with their Resource Center, replies referring to actual Technical Assistance, and replies referring to help with administrative requirements (often labeled by informants as TA). We provide a few of the points made more than once by these informants to provide the reader with some context.

Relationship with Their Resource Center

1. Most respondents indicated that they and their staff had expected to receive more support and Technical Assistance from their Resource Centers that had been the case.
    a. This was especially the case with informants from the Rest of State Resource Center area.
2. They also reported directing more inquiries to NYSED rather than to the RCs in search of assistance. These respondents felt they had a good relationship with NYSED managers and staff, and a weak relationship with the RC.
3. The project directors reported that they would have liked the resource center staff to provide Technical Assistance support beginning with a visit to their programs, providing training and support in areas such as family/parent engagement and community outreach.

Technical Assistance References

4. One Rest of State program further added that having local community support and a supportive school district were vital to having the program rectify any of their problems.
5. The project directors reported that they relied heavily on 'outside help' and using internet-based tools for program scope and content.

Help with Administrative Requirements

6. Many of the NYC project directors (both NYCDOE or CBO) reported not needing any help whatsoever and were able to take care of their own program issues.
    a. One CBO project director emphasized that their program staff could solve any problems with completing the APR (Annual Performance Report).
7. Other project directors reported that they relied heavily on 'outside help'. This included the assistance of their local evaluators (in completing the APR).
8. The project directors considered help with administrative questions, i.e., budgeting and completion of the Annual Performance Report) as part of the TA (sic). In those cases, they reported that their needs had been met through email or telephone communications.

The information from the project director interviews indicated that many project directors have been receiving support in administrative tasks rather than Technical Assistance in improving their program's service delivery. This 'support' is commonly provided in completing the Annual Performance Report, with budgetary concerns, and with NYSED requirements.

Most project directors reported never contacting the resource centers when their programs had specific needs other than requesting assistance for administrative tasks. In the interview, project directors were read a list of the different types of support and assistance they could have asked for. In Table 2, a list of those different types of support that programs could have received, the number of project directors that received that type of support, and their level of satisfaction are displayed and the help they were given is provided. The results in Table 2 indicate that more project directors requested and received assistance for administrative tasks and fulfilling of responsibilities. One project director reported they requested technical assistance with completing the APR, but never received it.

There was less than one-third of the project directors that received TA support with in-service staff and professional development for their programs (11 of 36), this being provided primarily at the annual conference, only 25% of the project directors received Technical Assistance regarding community outreach (9 of 36), and only 27.8% of the project directors received Technical Assistance on working with partner schools (10 of 36). There were also fewer project directors that received Technical Assistance in areas such as parent participation (12 of 36), or support while implementing programming (12 of 36).

Table 2 – What services and technical assistance have you received? N = 36

Type of Technical Assistance Received at your 21CCLC Program	Received		% of Yes	Asked, but not given	Who delivered it? [1]
	Yes	No			
1 Budget questions	23	13	63.9%	0	Resource Center, Other
2 Completion of Annual Performance Report	22	13	61.1%	1	Resource Center
3 Networking with other programs[2]	18	18	50.0%	0	Resource Center, Other
3 Help with NYSED requirements	18	18	50.0%	0	Resource Center
5 Identifying and accessing resources for your program	17	19	47.2%	0	Resource Center, Other

6 Support while implementing your program	12	24	33.3%	0	Resource Center, Other
6 Help with parent participation	12	24	33.3%	0	Resource Center, Other
8 Staff professional development, in-service training	11	25	30.6%	0	Resource Center; Other
9 Working with partner schools	10	26	27.8%	0	Resource Center
10 Help with community outreach/ engagement[3]	9	26	25.0%	0	Resource Center
Other[1] (Such as.)	0	0	0	0	

[1] Other = NYSED, Children's Aid Society, Annual Conference, local community organization (e.g., YMCA, evaluator).

[2] Networking opportunities have only been provided at the annual state conferences.

[3] Three CBO project directors have their own resources for this. The other project directors indicated interest in knowing about doing this.

A common area where several project directors reported to have struggled is in receiving principal buy-in at partner schools, especially if they are community schools. Those project directors reported wanting help with making principals understand what the purpose of their 21st CCLC program is, and with strategies on how this clear communication could be accomplished.

The interviews confirmed that project directors are aware of only some of the different types of Technical Assistance that could be provided to them by the Resource Centers, thus it would be difficult for them to request this support. Most knew about the provision of administrative information (i.e., finances), and information on completing the Annual Performance Report (APR). In addition, many project directors reported that they would have liked to receive on-site 'elbow training' related to administrative tasks and for training in how to coach their own staff. Nearly all the project directors reported that any technical assistance they did receive was primarily exchanged as administrative 'how-to' information through an email and/or telephone call and rarely in-person. The project directors further added that when the resource center staff visited their programs, it was mainly for a Monitoring Site Visit that reviewed program documentation and not to observe what their programs were doing. Additionally, the project directors reported that they would like the Resource Center staff to provide feedback on what their programs could be doing to improve implementation efforts, thus linking the work of the RCs and the local evaluators.

The NYSED Program Managers need to focus some attention on how best to use the already provided Technical Assistance resources to achieve their targeted results. For example, by providing all sub-grantees with basic explanatory materials, in print or via the program website, the drain on system resources of project directors individually requesting the same procedural information would be reduced. Working with the Resource Centers and the State Evaluators to implement all or selected parts of the EPIS Model for Technical Assistance mentioned earlier in this report would put a framework around NYSED's expectations for efficient and effective programming and the necessary performance indicators for monitoring that achievement. At the time of this writing the program website is being redesigned using a web architecture that promises to greatly enhance this area of program management.

Recommendation: Smooth-out General Administration Processes and Procedures

Immediate development of an Implementation Guidebook or Manual for Sub-grantee use to cut-down and curtail time and resources spent asking and answering procedural questions regarding Sub-grantee compliance with Federal and State reporting requirements.

Recommendation: Provide Multi-Level Actual Technical Assistance

The responsiveness and effectiveness of Technical Assistance provided to Sub-grantees would be greatly improved if it focused both on supporting NYSED Grantee Compliance Reporting, and in building Sub-grantee performance capacity through training and support in service delivery management and program improvement.

Effectiveness of Professional Development Provided

Technical assistance in the areas of staff professional development and in-service training did not always match the needs of the Sub-grantees. The external evaluator for both RCs did a 'needs assessment' for professional development in the 2013-14 program year. However, she listed only the in-house available professional development trainings from The Children's Aid Society (CAS), as the areas of professional development available, and asked programs for their *levels of need* in each area against that list. Although the CAS did not serve their population, the ROS-RC based their planning on that survey. State Evaluation site visits, Regional Evaluator Meetings, and other interactions with Sub-grantee staff members indicated to the State Evaluators that this was not a successful strategy. The State Evaluators did a Statewide Professional Development Needs Assessment early in the 2014-15 program year, and cut the results by RC catchment. The NYC-RC did consider the results, but were hampered by the sub-contracting out of all Professional Development, and that sub-contractor's limitations.

The methods of provision of in-service training by the two Resource Centers changed over the five years of this evaluation. This is not uncommon, often the plans put forward in a proposal do not operate as expected when implemented. A five-year plan such as those put into these proposals also has the pressure of participant growth, meaning that as Sub-grantee program personnel gained in experience their in-service training needs would have changed. This was the case with this program.

The New York City Resource Center's proposal outsourced all professional development services to The Children's Aid Society of New York (CAS). All the CAS professional development was to be in-person delivered. The Rest of State Resource Center proposed that they would identify or develop appropriate professional development workshops and webinars. As time passed, the CAS professional development moved from off-site sessions open to all Sub-grantees, either a half or full-day in duration, to Sub-grantee specific on-site trainings. The ROS online seminar type of professional development program failed to attract many participants after the 2013-2014 program year. The State evaluators found this was due to several factors, not least of which that the program's website did not allow for online interaction among participants, thus making the online seminar more of a lecture than an interactive in-service experience. In-person professional development posed its own challenges for the ROS-RC, primarily because it was a RC with a 54,000+ square mile service catchment area.

As RC funded years progressed, both RCs found that using their State Meetings to provide professional development opportunities to Sub-grantees was more efficient for them. The CAS continued to deliver program focused professional development to the NYC sub-grantees. The State Evaluators began to

report that Sub-grantee program managers noted that they faced hard choices in order to access professional development support for their staff. Some reported that they had decide either not to attend these meetings themselves so that their staff could attend (for the professional development opportunities), or attend themselves (for the NYSED information on compliance and other administrative issues) and not provide access to these opportunities to their line staff. Long term planning does not always work when context changes can block access to needed resources.

In the NYS State Evaluation 2013-2014 Annual Report at the end of the first funded year for Round 6 Sub-grantees, the State Evaluators suggested that the two Resource Centers should provide focused support and professional development training in both program management and behavior management. Combined with the State Evaluator PD Needs Assessment information and their own work with the Sub-grantees in their catchment, the NYC-RC through The Children's Aid Society (CAS) provided workshops for project directors and administrators on how to manage their programs. During the 2014-2015 program year, the NYC-RC offered workshops to program administrators and site coordinators in areas such as providing effective feedback for improving program quality, preventing chronic absenteeism, family engagement, and how to train program staff effectively. Follow-up customer satisfaction surveys from the State Evaluation indicated that many of the program administrators reported that the information was relevant to their professional practice and that they had subsequently shared the information with other professional staff in their workplace.

Information collected through the State Evaluation, including the project director interviews and evaluator discussions at Regional Evaluator Meetings indicated that training in how to work with partner schools (including both the administration and teachers), networking with other 21st CCLC programs, and the processes for community outreach and parent engagement were clearly identified needs. However, the State Evaluation found support in these areas to be uncommon. According to the project directors' survey, there were a few reasons why this is the case, such as:

1. The responsibilities of a project director are to oversee their program and complete administrative and financial tasks. When speaking about the shift to professional development being offered at the two annual meetings, project directors noted that many of the professional development trainings interested them. However, in their opinion it would have been more useful for their program staff (line staff) to attend instead.
    a. Due to the different expenses incurred at the now two meetings per year for directors and the professional development being enveloped into those meetings for the ROS, more flexibility regarding budget changes to accommodate circumstances created within the program management such as this would be helpful.
2. For ROS program staff that were not able to attend the professional development trainings and the twice annual State Meetings, due to the distances to attend single central-location programs,
    a. On-site training makes both programmatic and logistic sense. Certain topics for training would be strengthened by on-site training (e.g., family engagement training).
    b. ROS directors also noted they could afford to send staff if regional trainings were offered.
    c. Some programs have a holistic training approach, so training of trainers is another option, so that turn-key resources should be offered to make sure everyone is involved.
3. Directors noted that many of the program staff are school teachers and already have extensive training in academic instruction. Moreover, school teachers already attend professional development

training within their school district. For those reasons, programs would like to utilize training resources in areas such as social-emotional learning and knowing how to connect with local community organizations, two areas in which teachers are not usually experienced.

4. Reaching out to the project directors and inquiring about their specific needs would be helpful. This would improve communication and the relationship with the programs.
    a. The project directors also reported being able to provide more information during a phone conversation or in-person as those types of interactions are more fluid.
5. Project directors and their staff may already have knowledge of the professional development topic areas (prior to delivering the professional development trainings) and are searching for more in-depth content.
    a. The NYC-RC began to offer 'Part A and Part B' professional development sessions on certain topics for this same reason. They had the experience that Sub-grantees wanted this extended in-service in certain areas, then few attended. Professional development providers should be encouraged to offer in-service programs that can be attended by 21CCLC program personnel and other Extended School Day or Out of School Time program personnel to fill the seats and expand the professional network of these personnel.
6. Several project directors were unsure whether to contact the resource centers with specific and complex program needs because of being concerned with the expertise of the RC staff. More in person interaction with the RC staff by program managers and staff would open this professional relationship.
    a. These project directors reported solving their issues 'in-house' or with the help of their community partner(s).
7. Only one project director reported being completely unaware of the resource centers' existence.

Many of the program administrators also reported that they learned more information after sharing program experiences with other workshop attendees. This is noted in the EPIS Technical Assistance Model provided in the Technical Assistance Section of this report. In that model, "Providing Training" is detailed as 'Networking Meetings' and 'Webinars'. Offering program managers and staff the opportunity to interact with their counterparts in other programs has been met with positive responses by participants since the first year of this evaluation.

The project directors interviewed also reported wanting more in-depth and practical information. These requests reflect another section of the EPIS Model: the "Promoting Model Fidelity and Quality Assurance" portion. As noted earlier in this report, Technical Assistance is supposed to develop capacity, defined as "the process by which individuals, organizations, institutions, and societies develop abilities (individually and collectively) to perform functions, solve problems, and set and achieve objectives" (Barton, loc. cite). As project directors, these informants were also referring to professional development that would increase the capacity of their employees and their organizations to support the quality and effectiveness of those who work there. In addition, interviewees also referred to increasing the capacity of their organizations to strengthen their interrelationships with other organizations in their communities. Based on this, we note that Project Directors were requesting professional development to support increasing capacity.

For example, during the 2015-2016 professional development workshops at NYC-RC and ROS-RC meetings, program administrators were surveyed on the usefulness of the information presented at each workshop and to specify specific information they would like to learn more about. Many of the program administrators reported that the presented resources and strategies in the workshops were useful to their professional practice. Overall, the survey results indicated that professional development workshops needed to provide in-depth content knowledge with an opportunity for program staff to network and share their experiences as well as providing participants with practical applications within certain topic areas, such as trauma and family engagement.

At times, it has seemed that the Resource Center directors and/or their contractors lost sight of the reality of staffing in Out of School Time programs. The reality is that with part-time staff who often also have 'a day job', scheduling workshops to take place on weekdays is ill-advised. It was generally agreed that online instruction makes sense, but the RCs seemed unable to devise an alternative to using the program website that should have, but did not provide the ability to host training. The ROS-RC made much of their parent organization's provision of use of Adobe Connect, but that use was curtailed and then suspended. Questions from the State Evaluators as to why that was so were never answered.

The State Evaluators have recommended, and repeat the recommendation here, that every level of this program needs professional development in Planning. Program directors need training in how to develop a strategic plan and the related tactical plans to support its implementation. Site coordinators need training in content as curriculum combined with curriculum planning and instructional planning of its implementation. Once that is in place they then need to plan for the professional development their staff will need to affect the implementation. Managers need training on the use of data for stable decision making, and how to use their evaluators to help them get that data.

Recommendation: Professional Development and In-Service Training

The Professional Development portion of Resource Center contracts should include In-Service Training, and be specific and fluid. Professional Development (PD) is delivered to personnel who already have some professional background in the topics and areas being covered. In-Service Training (IST) is given to those new to the topics and areas being covered. Differentiating instruction as either PD or IST to Sub-grantee personnel would be helpful.

They should also be specific in that they should be based on valid Sub-grantee needs assessments as well as NYSED identified support needed to complete their Grantee Compliance responsibilities. Both purposes can operate simultaneously, NYSED should focus on both. Any feedback from participants in the professional support provided by the Resource Centers should be available to the State Evaluators directly, and reported to NYSED Managers as it affects all aspects of Sub-grantee management.

SECTION THREE: FOCUS PROGRAMS & ANNUAL PERFORMANCE REVIEW

Focus Programs

The Summative Evaluation reported here is an evaluation of the management of the Statewide program delivery system for the 21st Century Community Learning Centers (21CCLC) Program in New York State. It draws on data collected and reported in detail in all prior Annual Reports, Quarterly Reports, Evaluation Briefs, and quarterly meeting updates provided by The State Evaluator to the New York State Education Department (NYSED) Managers of this program.

To optimize the utilization of the data-based information collected from the more than fifty programs included for site visits in this State Evaluation over the five years of this contract, the State Evaluators used an iterative sample of individual program practice and performance design. This design also offered the ability for the State Evaluators to identify some consequently validated *best practices.* Iterative sampling in case study research methods is a process whereby evaluation researchers move back and forth between choosing cases for each data collection period and engaging in preliminary analyses of the cases sampled to inform the choices made for the next data collection period's sample. In this way, the State Evaluation used what emerged from the data analyses to inform subsequent sampling decisions, and to build a rigorous structure into the annual Sub-grantee study requirement.

The State Evaluation used each annual group's initial data review and visit as an induction into the iterative sample used for this part of the State Evaluation design, and continued to monitor that program's performance until the end of this evaluation contract. Thus, the sites' study moved from exploratory (pre-site data review) to descriptive (on site focused interviews, review of program delivery structures and management materials) and finally using data from the combined site datasets within the full iterative case study as explanatory.

State Evaluation Site Visits

The State Evaluation has visited a total of 53 21CCLC programs since the 2012-2013 program year. Of those 53 programs visited, 43 of them (since the 2013-2014 program year) are in the current Round 6 grant cycle. All State Evaluation site visits are rigorous as the State Evaluators focus on the interactions of staff and students and how all components of each program function to form the whole program.

Of the 43 programs visited since the 2013-2014 program year, 21 site visits were conducted in NYC and 22 at Rest of State programs. A total of 23 CBO Sub-grantee 21CCLC programs were visited and 30 School District Sub-grantee 21CCLC programs were visited. For a more detailed breakdown of the site visits completed by area and organization, see Table 3 on the following page.

Table 3 – Site Visits: By Year, Region, and Organization Type

Program Year	New York City	Rest of State	Total
2012-2013	6 (4 CBO and 2 NYCDOE*)	4 (4 CBO)	10 (8 CBO and 2 NYCDOE)
2013-2014	8 (6 CBO and 2 NYCDOE)	7 (3 CBO and 4 SD**)	15 (9 CBO, 2 NYCDOE, 4 SD)
2014-2015	4 (3 CBO and 1 NYCDOE)	6 (2 CBO and 4 SD)	10 (5 CBO, 1 NYCDOE and 4 SD)
2015-2016	4 (3 CBO and 1 NYCDOE)	6 (3 CBO and 3 SD)	10 (6 CBO, 1 NYCDOE and 3 SD)
2016-2017	5 (3 CBO and 2 NYCDOE)	3 (3 CBO)	8 (6 CBO and 2 NYCDOE)
Totals	27 (19 CBO and 8 NYCDOE)	26 (15 CBO and 11 SD)	53 (34 CBO, 8 NYCDOE and 11 SD)

*NYCDOE is the New York City Department of Education. Because of the agreement between NY State Legislature and NY City Mayor's Office, although there are 'school districts' in New York City, these grants are presently managed through the NYCDOE Central Office.

**SD refers to a School District awarded and managing the sub-grant, only operating as such in the ROS.

Round 6 Sub-grantees could apply for permission to use 21CCLC funds for programs delivered during the regular school day. The State Evaluators ensured that some of the State Evaluation site visits were to schools or organizations providing program services during the school day. This report discusses out-of-school-time only programs first, followed by details of site visits to in-school-time programs in the sections "On-Site Visits: Out of School Time" and "On-Site Visits: Within-School-Time", respectively.

Although all 21CCLC site visit programs were randomly selected to receive a State Evaluation site visits in each program year, the State Evaluators targeted different sub-sets of Sub-grantees each year. For example, one year they visited programs randomly selected from the set of programs receiving $1m per year or more. In another year, the State Evaluation Team visited programs with funding to provide 21CCLC programming in the summer. Another random selection was from programs receiving the lowest 10% of annual support amounts. The breakdown by Sub-grantee organizational type in Table 3 shows that Statewide there were more CBO Sub-grantee programs visited than School District Sub-grantees. More specifically, more CBO Sub-grantee 21CCLC programs were visited in NYC and more school district Sub-grantee programs were visited for the Rest of State. Each year, the State Evaluation's annual list of proposed State Evaluation site visit sites and reasons for the sub-categories when used, were sent to NYSED for review and approval.

State Evaluation Program Site Visits: On-Site

Each project director received an email notification of a State Evaluation site visit to their program and its purpose. They were asked to provide the state evaluator with selected program documentation (i.e., program schedule and curriculum), and to provide a convenient time for a brief phone interview prior to the state evaluation visit. In preparation for each visit the state evaluator reviewed each program's original proposal and prior annual evaluation report and conducted the phone interview to provide the state evaluator with a deeper and more detailed understanding of each program. This exercise also provided a line of communication with the project director and to revisit the email notification if the project director had any general questions.

During the State Evaluation site visits, the State Evaluators focused on:

1. Engaging in an in-person interview with the project director, site director, program staff (i.e., line staff), school administrator (i.e., principal and/or assistant principal from the primary partner school), any parent coordinator community advisory group, parents, and students. The interviews were open-ended and thus fluid, allowing the evaluators to pursue points made that provided a deeper understanding of the form and function of the program being visited. Together with the desk audit data collected from existing written documents on each program, and the specific program component details provided prior to or during the visit, the State Evaluation gained an overall idea of what was happening at each 21st CCLC program, including both its structure of the program and function;
2. Whether each 21CCLC program integrated community engagement into their structure and function, and if so how that was accomplished;
3. Whether the project director, site coordinator and line staff believe that the program would be sustainable if it no longer had 21CCLC funding; and
4. Identifying each program's top three needs, and developing a contextualized understanding of these needs.

State Evaluation Site Visit Observations: Out of School Time (OST) Programs

There were a few programs that structured their afterschool program with youth development activities or clubs (two separate sessions of 90 minutes each) for the entire afternoon. These programs typically also offered the option for students to attend a homework help session (e.g., homework café) and receive assistance from a tutor. **Based on all site visits and cross-checking, the State Evaluation has found that this structure is the most effective for establishing and increasing engagement in the program activities.**

There were also 'opposite' programs that structured their afterschool programs to offer 3-hour homework and remedial help sessions. At one NYC CBO-led 21st CCLC program, a group of 70 high school participants attended school for 8 hours and then attended the afterschool 21st CCLC program for an additional 3 hours in a remedial help session in either English Language Arts or mathematics. An observation by the site visit evaluator of those high school students in this program indicated that, while some were attentive to the classwork presented to them (on the day observed, test preparation), many appeared to be disengaged. This is based on the observed high level of side conversations, viewing and manipulation of smartphones or of some students even taking a nap. **Based on all site visits and cross-checking, the State Evaluation has found this structure to be counterproductive and detrimental for engaging participants to attend the program activities.**

Homework help, test preparation, and remedial tutoring are not what the program funder means by academic-focused activities. The results of this State Evaluation indicate that observed program participants were more engaged in program activities when attending youth development activities than when attending non-enrichment focused school-day related activities. Actual academic-focused activities when provided, such as ELA Push-in Tutoring, Applied Science, Literacy Group, or Power Hour, also were found to be engaging for the participants.

The OST Afterschool Program Structure

By definition **enrichment** makes something more meaningful, substantial, or rewarding. Academic **enrichment** improves something or makes student academic experiences something more valuable. For

this reason, the USDOE does not view homework study hall as an appropriate component of this program. Clear definitions of the terms used by this program are needed and should be prepared, disseminated, constantly referred to, and used to identify programs that are non-compliant with the funders' intent.

Nearly all the afterschool programs visited were divided into two daily sessions (or halves). The first session was designated for academic support and homework help, test preparation, tutoring and remedial help in English Language Arts and mathematics. The second session was designated for youth development enrichment activities. According to most of the project and site directors, homework help and test preparation have been implemented during the first session of afterschool programming because the partner school principal(s) wanted to ensure that students received additional support in their classwork. The site directors also reported that these activities in the 21st CCLC program have helped strengthen their relationship with the partner school principals. The same site directors confirmed that the primary focus of the principals was to increase their students' state assessment scores in the English Language Arts and Mathematics.

An additional circumstance of the OST programs visited was that in a majority of cases, the site directors were either a classroom teacher or an assistant principal in the partner school building. This influenced their program content decisions because their relationship to the partner school (as their 'real job') meant they felt a sense of obligation to provide the 'bundled' academic support services. When asked about this most indicated it was because the school principal expected them to make sure these were offered.

When questioned about homework help, nearly all program staff at each site visited noted that parents have an expectation that all homework would be completed before their children were sent home. When asked, some program staff reported that parents: (1) often mention that they do not have time to help their children with homework assignments, and (2) in many cases, do not understand the school-work being sent home.

After observing the overall attendance of both types of afterschool sections, there were more participant students attending homework help, test preparation, and remedial help activities held in the first half of the session, than youth development enrichment activities (i.e., dance, band, drama, graphic design), held later in the program.

State Evaluation Site Visit Observations: Within the School Day (WSD)

2013-14 was the first time that 21CCLC Sub-grantees could use this funding for activities during the regular school day. Initial site visits (and regional Local Evaluator Meetings) made the State Evaluation evaluators aware that there was a high level of misunderstanding regarding this use of these funds. The confusion seemed to fall into three broad categories:

1. A belief that there was no permission required to use the funds during the regular school day. The belief was that if you had a grant you could use it in either OST, WSD, or in a combination of the two.
2. Permission to use the funds within the school day meant that the funds could be used to provide what many in the State believe are 21CCLC mandated services: remediation, tutoring, and extra-time for homework completion.
3. Permission to use the funds within the school day meant that funds were 'fluid', i.e., principals could decide what they wanted to use the funds for with no restrictions.

The 'without permission WSD' was introduced to the State Evaluation Team during the very first Regional Evaluator Meeting early in Round 6. Local evaluators were asking how they should respond to some of their programs that had decided to use the funds for within school time services. Most were unaware that permission was needed to shift the funds into the regular school day. The State Evaluation director notified NYSED managers that there was some confusion, and notified the local evaluators that permission was necessary. NYSED confirmed that emails had been sent to Sub-grantees, and that they would communicate again. To our knowledge, however, nothing changed following this discussion. We do know that the ROS-RC whom the State Evaluation notified of the issue as it was in their catchment did not visit the Sub-grantee in question.

State Evaluation site visits encountered some schools that had expanded their regular day programming to include 21CCLC program components, and that were experiencing success with having done so. The visits also confirmed the three forms of confusion throughout the four years of the State Evaluation's interactions with Round 6 Sub-grantees and their evaluators. Whether they had NYSED permission or not, WSD use of funds either: (1) implemented 21CCLC programming in the regular school day as required; or, (2) used 21CCLC funding in the regular school day to support a broad array of activities generally not included as an appropriate use of 21CCLC funds.

Schools that had committed to mainstreaming the non-academic components of the 21CCLC Program into their regular school day were often surprising and always amazing in their own way. One program had extended the engagement of their school faculty to an extent that was a challenge for the evaluator to understand fully in a short site visit. The State Evaluator did leave the site really impressed at how integration of 21CCLC approaches could reach into traditional instructional environments with clear planning and strong implementation support from their administrators down. As the building principal noted in their interview, not all faculty were 'believers' as he called the integrating faculty, but many were, and general student maturation (taking of responsibility for self and others, for example) was being noted. The school had opened a Parent Resource Center, easily accessed from the school entrance, and open 7:30-5 on school days. The Center was used, by parents, grand-parents, elder siblings, students, teachers, counselors, and the 21CCLC staff on the day of this unannounced visit.

The difference in the behavior and likely student outcomes in the 'fully integrating' schools and those applying the 21CCLC funds to 'more of the same' is illustrated here for clarity using one seminal incidence, in which a district had been given permission to use program funds within the school day. The district had more than one school in the 21CCLC program, so the State Evaluation Team visited more than one school. One building visited (Building 1) was clearly integrating 21CCLC approaches and another visited school (Building 2) was using the funds in quite a different way. What was interesting, and surprising was that the same Sub-grantee contractor worked in both buildings so the State Evaluation could make a cross treatment comparison – which was helpful. In the integrating building the Sub-grantee contractor provided a program on self-awareness leading students to an awareness of others, as well as working on bullying and other topics throughout the school year in scheduled time. In the other school (Building 2) the Sub-grantee contractor's staff operated more as Teaching Assistants, working in classrooms with teachers to support challenged students, providing AIS support, doing routine preparation tasks such as running photocopies and lunch duty, and overseeing in-school suspension rooms. The contractor was not happy with this situation, but had been threatened with dismissal if they did not cooperate and allow each principal to decide how the funded support was to be used. The Building 1 principal met with the State Evaluator, as did faculty and staff. The Building 2

principal was not available, so we were unable to clarify their intent. Subsequent attempts to speak with that principal by phone were not successful.

This belief that the use of 21CCLC funds is a case of 'Principal's Choice' was witnessed by the State Evaluators more than once. It is a version of OST programs doing what partner schools and parents demand they do, rather than what the federal legislation requires, but more fluid. The State Evaluation site visits to high schools yielded an interesting fluid use of 21CCLC funds. One site visit to two NYCDOE high schools is a good example. As was the practice, the State Evaluation contacted the NYCDOE manager for their grants and arranged to visit one of four high schools. Early in the discussion of dates and places, the State Evaluators received information about all of the possible sites to visit, including class schedules, dates of services, etc. As was also the State Evaluation's practice, one senior researcher went to the high school that had been told to expect a visit, and another went to a nearby school that was not expecting the State Evaluators that day, but had scheduled services for that day. The notified site had classes ready to observe, students to talk to, a full discussion of in school time Regents' Prep and other test readiness interventions they were using the funds to support. An afterschool theater group, arts workshops, jazz ensemble, and other activities were well attended (although when asked students indicated they did not meet every day or even that often). 'Sharing' by the theater group indicated that the participants were from theater-going, professional households, but the program was operating if not with the expected target audience. The experience at the unannounced site was quite different. All activities that should have been happening were not. Walking around the school with the site program director who was an assistant principal's secretary, the State Evaluation Senior Researcher was no more surprised than she was. The building project director clearly thought the 'lunch-time chess' through to the 'after school jazz band' were operating in the building that day. We never found out where the Sub-grantee's contractor's team from that school was that day.

In many cases, the local evaluators from programs using the funds by 'principal's choice' asked how they could 'make their client behave' whenever we found ourselves in an evaluator meeting. The fact is, they could not. The State Evaluators confirmed with local evaluators that their role was to measure: compliance, effort, successes, and things that needed modifications. The State Evaluators confirmed that they were expected to report the truth as the data presented it, and that they could add any insights they gleaned from the work if they were labeled as such. Evaluators cannot take over management. In this, and all cases such as this, the State Evaluation reported any findings to NYSED managers in verbal and quarterly reports.

Other Site Visit Notes in General

During the site visits, the State Evaluators logged focused observations regarding the program structure at each site, noting that there are clear patterns regarding responsibilities of the programs' line-staff. School district-led 21CCLC OST programs were found to have program staff who were predominately classroom teachers, administrators, or retired classroom teachers. Community-based organization Sub-grantee 21CCLC OST programs in the ROS were found to have a staff combining their own staff and school teachers. In New York City, the NYCDOE required all 21CCLC programs, both NYCDOE and non-DOE Sub-grantees, to use NYCDOE teachers in their programs. The main observation regarding this requirement by the evaluators are on two points. First this caused a great many problems as most of the CBOs had not budgeted for that expense (NYCDOE teachers received both the per session pay rate and contributions to their pensions from all 21CCLC programs, raising the staff cost per hour to around

$60/hour, or the equivalent of $124,800 per year). In addition, this higher cost for the academic portion of their program led to some having to limit other 21CCLC components, or eliminating them altogether.

Enrichment activities (e.g., dance, various clubs, community service projects, trips to outside places, cooking, etc.) were delivered by both school teachers and outside organization staff. Some activities that were delivered by school teachers were student-driven ideas or built on the strengths of the teacher's knowledge in a specific subject. For example, a mathematics teacher who had spent some time in Japan created a Japanese Club to teach the Japanese culture that included its traditions, cuisine, and language to a group of minority students in a New York City program. At another program, a social studies teacher and site director created a Minecraft Club with the objective to teach students to develop a virtual environment containing historical architecture similar to the Roman and Greek empires, a part of history of particular interest to him. Staff from community-based organizations were generally found to have knowledge and skills in areas such as developing strategies supporting a participant's social-emotional development, art, dance, theater, sports, community service projects, and cooking. The overall sense of 21CCLC programming and its staffing culture are that school teachers are solely used for delivering academic support services along with several enrichment activities, whereas outside organizational staff (from a CBO, contractor, or other source) delivers activities that their organization is expert in, such as sports, arts, dance or teaching social and emotional support strategies to students.

A common finding across most of the programs was that staff responsibilities were siloed relative to the services they delivered to the participants. Nearly all services considered to be 'academic' in nature were delivered by school teachers in each 21CCLC afterschool program. In the regular school day, the State Evaluators site visits noted two exceptions to this OST practice: community volunteer support staff providing literacy services (e.g., reading) to elementary school students; and, a community-based organization's staff providing push-in and pull-out support services to a specific caseload of participants.

Recommendation: 21CCLC Programs Out of School Time and In School Time

Once again, the State Evaluators recommend an *Implementation Manual* that is clear, precise, and easy to follow, with parameters, instructions, worksheets, and resources for program planning, implementation and monitoring provided, and utilization of them stipulated as a requirement.

Annual Performance Review (APR)

For the first three years of this contract, the State Evaluator had access to all the numeric information entered into the Program Performance Information System (PPICS) for the Annual Performance Report (APR) sent to the Federal Department of Education. The State Evaluators contracted the secondary analysis of that numeric information to a WBE Certified evaluation company. In the first two years, State Evaluation Senior Researchers redid the contractor's work because it did not meet the company's specifications. In the third year, as the new Annual Performance Report system was being introduced to the program nationwide, the secondary analysis of the contractor was delivered to NYSED Managers directly by them. The State Evaluators did not do a reanalysis at that time.

Because New York does not have its own data capture system in place, the State Evaluation relied on the information provided by Sub-grantees directly (for Focus Programs, for example) and by their local evaluators (usually accompanying a question to the State Evaluators about how to handle particular data elements or analyses questions). There is no usefulness of the APR data to inform State level or

local level decisions with data-based information, nor is there supposed to be. The APR is designed by the Federal Education Department to inform their report to the US Congress on the operations of the program, and are thus too general, unattached to a low enough level of activity to be useful, and generally are a good compliance report for the State grantees but useless in their management of Sub-grantees. In speaking with State Evaluators from other states, State Evaluation Managers were not surprised to find that all other large states (California and Texas, for example) had used their 21CCLC funds to purchase or develop a State Level APR Data Capture System that provided State Managers with actionable data-based information for Sub-grantee management as well as 'bridging' to the federal APR system. In most cases, the evaluators shared that their states used the same system for other grant funded programs as well as for day to day administrative tasks.

To date, NYSED has not invested in a State Level APR Data Capture System. The State Evaluator was assured that one is 'in the works' for roll-out in the 2018-2019 Sub-grantee program year.

Recommendation: Data Utilized at Both Local and State Levels in Addition to APR

The State Evaluator continues to encourage NYSED Managers to develop a State Level APR Data Capture System that will allow them (and their State Evaluators), Sub-grantee managers (and their local evaluators) to generate management and program delivery decisions using data-based and data-informed information to ensure high probability of acceptable State and program performance.

SECTION FOUR: WORK SUBSTITUTED OR IN ADDITION TO CONTRACTED SERVICES

2015-2016 21st CCLC Program Attendance Analysis

The 21st CCLC Roster Spreadsheet Attendance Analysis included the attendance rosters from 128 out of 129 Sub-grantees for a total of 70,718 student participants for the 2015-2016 program year. One Rest of State School District led program did not participate in sending their attendance roster to NYSED. The student attendance was cut into two levels with five different analyses. Different cuts of data were analyzed by statewide, regionally (New York City and Rest of State), organizational type, and by overall cost. The focus of these analyses targeted the number of hours that participant students attended. Although the 90-hour recommendation by NYSED is to increase the likelihood of programs reaching student and program outcomes, programs expressed their intention of having their target population attend for 90 hours of programming in their awarded proposals. The number of days provided by most programs was found to be inconsistent and with many discrepancies (i.e., many participants were found to have attended for seven days and receive the recommended amount of 90 hours of programming), and was not used for further analyses except for descriptive statewide statistics.

Limitations of the Attendance Analysis: Points for a New Data System

Because of the nature of the data collected, the attendance analysis utilized only the number of attended hours. Although the number of attended days was provided to the State Evaluator, it was excluded due to questions regarding data integrity across programs.

In addition, there were important data elements missing from the dataset as they were not collected by NYSED. The limitations of the analysis are important to note here, especially as NYSED Managers begin work on a new State Data Collection System.

Data should be entered by unique student identifier, including where they are and who is working with them, so cross variable analysis is possible at the individual level. This allows valid and reliable analysis of data through aggregate. Without it, analyses such as the following are not possible:

a. **List of activities linked to the number of hours that students received** – Although the number of hours are documented, the State Evaluator does not know which activities were attended. There is a possibility that many of the students that received 90 or more hours of programming could have spent most of their time in homework help, test preparation and remedial sessions rather than in enrichment activities. If they had been providing, cross-referencing the activities with the number of hours could provide the ability to identify a core set of activities that students were more attracted to and link them to student outcomes.

b. **Test score data** – The data elements are not 'linked', meaning that the evaluators cannot identify the number of hours students received and link that 'treatment level' to their test score data (or report card grades). There can only be a general, program level amount for growth in the core subject areas and in proficiency. Because of small numbers in individual activities in Sub-grantee programs, statistical error in small samples means this would be statistically useless.

c. **Student behavioral data** – Number of suspension or detention instances cannot be linked to the number of hours students attended because the data elements for each student are not linked via student id number, for example.

d. **The number of hours were not particularly specified as to when the students received them** – From the 21CCLC program roster spreadsheets, there is no information as to when the students received the number of 21CCLC program hours recorded. For example, did students receive 90 hours of programming throughout the school year (over a duration of 8 months) or was it during a shorter period (over a duration of 6 weeks). [iv]

e. **The individual site locations** (i.e., school or center) for each 21st CCLC program was not used in this attendance analysis as many programs did not list the sites for their programs. According to instructions provided by NYSED managers for their 21st CCLC Program Roster Spreadsheets, providing this piece of information was optional and many programs did not include it.

Highlights of Attendance Analyses & Recommendations Made

Attendance below thirty (30) hours was at unacceptable levels. The statewide analysis indicated that the most frequent number of hours attended (the modal value) was 2 hours (n = 1,671) and 0 days (n = 3,035). Considering that 1 day equates to 3 hours, programs that listed their participants to have attended for only 1 or 2 hours received 0 days of programming. Indeed, a total of 11,269 of 70,718 participants (15.9%) that attended the program for 1 to 9 hours of programming. School district led programs were found to have more students that attended 1 to 30 hours of programming and fewer students attending 90 or more hours in comparison to community-based organization, institutions of higher education, and charter school-led programs.

A regional analysis indicated that at 40.9% of all New York City participants, had the highest rate of participants attending from 1 to 30 hours of programming. This compares poorly with students in the Rest of State 21st CCLC programs, where only 27.6% of their students attended for 30 hours or less.

A total of 14,028, or 35.8% of 39,197 students in New York City programs attended 21st CCLC programming for 90 or more hours. The New York City program results also indicated that 6 of 18 New York City Department of Education School District Programs had 17% or less of their total enrolled students who attended 21st CLCC programming for 90 hours or more. For the Rest of the State, 47.9% of all participants attended for 90 hours or more, that is, 15,083 out of 31,521.

The statewide analysis also indicated that 13 of 128 programs (10.2%) met their target number of students and reported that those students attended for at least 90 hours of 21st CCLC programming. There were a further 11 of 128 programs (8.6%) that were close to reaching at least 90% of their targeted number of participant students in attending for 90 hours of programming. Of the sate total of 70,718 participants, 29,111 (41.2%) of them attended 21st CLCC programming for 90 hours or more.

Examples of Excellence:

1. One New York City community-based organization led program provided 21st CCLC programming services to a total of 1,286 students with a target enrollment of 490 (796 more students than originally intended). However, only 49 students (10%) attended for 90 hours or more.
2. One Rest of State School District led program had a total of 1,451 students attend its program and a target enrollment number of 1,400. There were only 12 students that attended for 90 hours or more (0.8% of 1,400).

3. One Rest of State School District Sub-grantee program provided services to a total of 1,687 students with a target enrollment of 800. This was an additional 897 students that received 21CCLC programming services. This program had 808 students attend for 90 or more hours of programming.

4. One New York City community-based organization Sub-grantee program provided services to a total of 287 students with a target enrollment of 62. This was an additional 225 students (438.7%) that received services. In this program 272 students attend 90 hours or more. Although this is a positive finding for providing additional services to many other students and families, the amount of funding for the original target enrollment is higher than average across similar funded programs.

Recommendation: Use of State Data to Increase Sub-Grantee Compliance

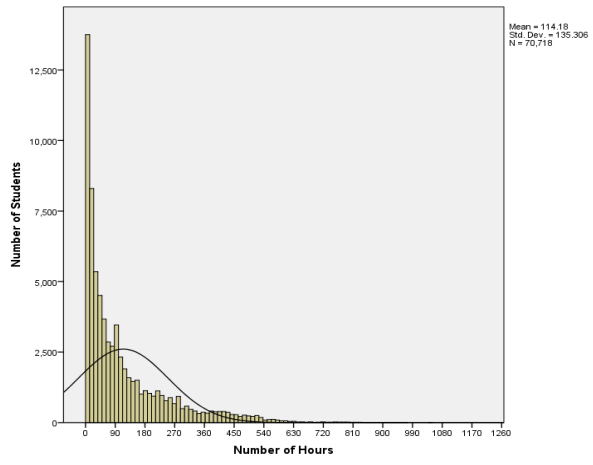
NYSED should use State Data System collected attendance and student performance data in a quarterly schedule to pinpoint Sub-grantees in need of RC support. In addition, NYSED should set a performance 'floor' as a minimum level of compliant performance for each Sub-grantee, which will be checked against quarterly data pulls at the State level. Finally, NYSED should set non-compliance consequences to ensure fair treatment of compliant programs.

Overall Results of the Attendance Analysis

The results to the attendance analysis indicated several findings. Of the 128 programs that sent NYSED their program attendance rosters (i.e., via Microsoft Excel), 13 programs (10.2%) were able to meet their target number of students and report that those students attended for at least 90 hours of 21CCLC programming.

The analysis also indicated that the most frequent number of hours attended (the mode) statewide was two (2) hours. When cut by Region, for the 71 New York City programs, the most frequent number of hours attended was also 2 hours, and for the 58 Rest of State programs, the mode was 90 hours. Indeed, 29,111 out of the 70,718 participating students (41.2%) attended 21CCLC programming for 90 hours or more. Many participants attended between 1-30 hours. For further details, see Figure 1.

Figure 1 – Number of Attended Hours Statewide



The results in Figure 1 indicate that the usual 'hours attended count' performed for this program can present a skewed illustration of patterns of participant attendance. The figure shows 21CCLC programming with a spike at 2 hours. Despite what the figure seems to show, there were many attending for hours exceeding the recommended 90 hours (i.e., 270 hours or more).

A further analysis regarding the number of hours attended by region was conducted, and are presented in Table 4, on the following page.

Table 4 – Number of Hours Attended by Region (NYC or ROS)

Region	Number of Students	1-30 Hours	31-60 Hours	61-89 Hours	1-89 Hours Sub-Total	90 or more Hours
New York City	39,197	16,042 (40.9%)	5,770 (14.7%)	3,357 (8.6%)	25,169 (64.2%)	14,028 (35.8%)
Rest of State	31,521	8,691 (27.6%)	4,658 (14.8%)	3,089 (9.8%)	16,438 (52.1%)	15,083 (47.9%)
State Totals	70,718	24,733 (35.0%)	10,428 (14.7%)	6,446 (9.1%)	41,607 (58.8%)	29,111 (41.2%)

The results presented in Table 4 highlight the similarities and differences between NYC and ROS. NYC, due to the skewing of the attendance data by the NYCDOE Sub-grantees, shows a high percent of participants attending for 1-30 hours, and that number skews the Statewide Total percent. However, note that the percent of participants attending from 31-60, and from 60-≥90 hours are also very much the same.

A different summary shows that 59.6% of New York City's enrollment attended 21st CCLC programs for 30 hours or more, the minimum State expectation. That same summary shows that 76.7% of the Rest of State's enrollment attended 21st CCLC programs for 30 hours or more, and 47.9% had attended for 90 hours or more.

Table 5 – Number of Hours Attended by Organization Type and Region

Type of Organization (Sub-grantee)	Location	1-30 Hours	31-60 Hours	61-89 Hours	90 or more Hours
Community-Based Organization	NYC (n = 16,391)	25.0%	10.5%	6.8%	57.7%
	ROS (n = 12,792)	27.4%	11.7%	7.5%	53.4%
	Total (n = 29,183)	26.0%	11.0%	7.1%	55.8%
School District	NYC (n = 20,820)	53.3%	17.7%	10.0%	19.1%
	ROS (n = 18,349)	28.1%	17.4%	11.4%	43.5%
	Total (n = 39,169)	41.5%	17.4%	10.7%	30.5%
*Institute of Higher Education (NYC only)	NYC (n = 1,783)	47.5%	19.5%	7.8%	25.2%
Charter School	NYC (n = 203)	8.4%	9.4%	4.4%	77.8%
	ROS (n = 380)	10.3%	7.6%	7.4%	73.2%
	Total (n = 583)	9.6%	8.2%	7.4%	74.8%
Totals	Statewide: 70,718	35.0%	14.7%	9.1%	41.2%

* 1 IHE program in New York City was removed from the analysis due to pending validation of their attendance data.

A further analysis was conducted by calculating the number of hours that participants attended by the type of Sub-grantee organization (e.g., School District, Community-Based Organization, Institution of Higher Education, and Charter School) and by region. The results to that analysis indicate that community-based organizations and charter schools performed well statewide, and the Rest of State

School Districts were able to have many of their students attend programming for 90+ hours. The results also indicate that the New York City DOE School Districts had the most students attending 21st CCLC programming for 1-30 hours. For further results of this analysis, see Table 5.

A cost analysis was conducted for the 21st CCLC program based on the total funding provided to the field of 129 programs. The analysis focused on the number of student participants that attended the 21st CCLC program for at least 90 hours. Of the total 70,718 student participants, there were 29,111 (41.2%) that met the criteria. The cost analysis found that an average of $2,705.84 was spent for each student of these students. The cost analysis was also cut by region, indicating that New York City programming was more expensive than Rest of State.

Programs that Excelled in Student Retention and Attendance

Based on analysis of the attendance data, the table below identifies 21st CCLC Sub-grantees (programs) that should be noted for their good efforts in meeting their target enrollment number of participants and having them (or nearly all of them) receive at least 90 hours of 21st CCLC programming. However, please note that our State Evaluation has questioned a few of these programs' data.

Table 7 – Programs Meeting their Target Enrollment Attaining 90 or More Hours

New York City (with last 4 ID numbers)	Rest of State (with last 4 ID numbers)
Academics in Motion – 6001	Lyons CSD – 6109
Associated Beth Rivkah – 6008	Syracuse CSD – 6118
Cypress Hills Local Development Corporation – 6026	Northtowns Boys & Girls Clubs – 6012
Good Shepherd Services – 6031 *	Nepperhan Community Center – 6038
Phipps Neighborhoods – 6048 *	YMCA of Greater Syracuse – 6069
Play Study Win – 6049	University District Community Development Association – 6070
St. Mary's Development Center for Children and Families – 6055 *	Fallsburg CSD – 6103*
The Children's Aid Society – 6066	Mount Vernon Youth Bureau STRONG – 6111
The Children's Aid Society – 6127	Peekskill CSD – 6112*
YMCA of Greater New York – 6075 *	Rochester CSD – 6114
Harlem RBI – 6126	University Preparatory Charter School for Young Men – 6123*
RF CUNY Hunter College CASE – 6052 *	Cornell Cooperative Extension of Franklin County – 6125*

The twenty-four (24) 21st CCLC programs listed in Table 7 reported meeting their student target enrollments and having their participant students attend 90 or more hours of 21st CCLC programming. However, the State Evaluation notes that this is based on retrospective self-report by program managers, not necessarily submitted by local evaluators.

Review of Thirty (30) 2014-2015 Final Evaluation Reports

The State Evaluator randomly selected thirty (32) 2014-2015 final evaluation reports to review as a substitution to the secondary analysis of the APR portion of their contracted evaluation activities. Provided that the secondary analysis of the 21st CCLC Profile and Performance Information Collection System (PPICS) could not be conducted (currently the Annual Performance Report – APR), with NYSED approval the State Evaluator substituted this review as the review was not part of their agreed Work Plan. Before reviewing any of the evaluation reports, the State Evaluator developed an evaluation report rubric to determine whether all required information (as stated in the Report Guidelines prepared by the State Evaluator and approved by the NYSED Manger) was included and to score the 'quality' of each report based on the utilization and support of data-based findings.

The overall findings of the evaluation report review indicate that 9 of 30 (30%) of the evaluation reports met NYSED's requirements. Of those 9 reports, 4 of the evaluations (13%) were well executed and articulated clearly. For the 21 evaluation reports (70%) that were found to be lacking the required components, many of them seemed to have focused more on attendance, the Annual Performance Report (APR) information, and whether the program met its goals and objectives. While these evaluation reports lacked data-based findings to support such claims and did not provide enough details, they did however, provide honest and trustworthy information about their programs function and structure. It is important to note that the result of the local evaluators not providing more detailed and evaluative program information could possibly be based on being particularly focused with collecting information to complete the APR. The State Evaluators note again that the 'Legacy System' still much a part of the 21st CCLC program continues to frame how many (perhaps most) Sub-grantee managers judge the importance of attendance evaluation-based requests made by NYSED managers. Over a decade of focus on attendance data and priority given to completing federal reports above all things will take some time, a great deal of patience, and collaborative support to modify. As we note here, with the evaluators using so much of their time (and evaluation budgets) with these APR-related activities, they are allowed little time to collect data on the finer details of their programs.

After reviewing the amount of funding for each awarded 21st CCLC proposal, the average amount of funding spent on local program evaluation services was 6% or $35,900. The least amount of funding spent towards local program evaluation services was $4,000 (1%) out of a $368,283 annual budget and the most amount of funding spent was $96,000 (8%) out of a $1,200,000 annual budget. If a local evaluator received $4,000 (1%) or $6,900 (2%) of a program's annual budget, it would be very difficult to fulfill the requirements for a rigorous evaluation.

Recommendation: Level of Cost Allowed for Local Evaluation Requirements

As the State is placing requirements on local evaluators it would be wise to consider placing not only a ceiling on the percent of each Sub-grant can be spent on their Evaluation, but also a floor. The State Evaluator recommends a 6% floor and a 9% ceiling.

The New York State Evaluation Network and Evaluator Meetings

Additional to Contract

For nearly a decade, the New York State Education Department has been supportive of the contribution evaluation can make to achievement of program goals and objectives, and the measurement of performance outcomes. Their engagement in the evaluation process began with the inclusion of an 'evaluation set-aside' in each program request for proposals (recommended by the State Evaluator) for compliance measurement. NYSED managers continue to report the value to them of evaluative information collected at both a state and local level.

The struggle by some local evaluators to use *performance-based evaluation* made it clear to the State Evaluator that some in-service support would be needed by those local evaluators. Although also outside of the company's contracted services, the result outweighed the cost to the State Evaluator as it was important to the company to build Evaluation Capacity in the 21st CCLC system, thus building evaluation capacity at the Sub-grantee level. To facilitate this support, the company established an e-mail address dedicated to the network of local evaluators so that they had direct access to the State Evaluation's Project Director and staff in case of specific questions or concerns. One unintended outcome of this work was a deeper connection between the State Evaluation Team and many of the Sub-grantee programs. Entering this relationship through the shared professional evaluation perspective aided the development of a strong connection between the Statewide Evaluation as a fact and its need for clear, honest information as a necessary component of its quality.

The State Evaluator conducted a total of ten (10) regional evaluator meetings beginning midway through the second program year (2014-2015) of Round 6 and the third year of this contract. The evaluator meetings consisted of discussions on various research designs, measurement of program effect, differences between announced and unannounced site visits, going through a set of in-service trainings for evaluation capacity building that the State Evaluator uses in other work, reviewing different logic model frameworks, and discussion of issues around measuring extended learning time (ELT) programs. During the discussions, The State Evaluator also presented examples and lists of draft program measures, indicators, and youth outcomes that local evaluators could consider using in their practice. As local evaluators were introduced to the materials, they were asked to critique and comment on whether specific measures would work with their programs. At the end of each meeting, the local evaluators shared some further challenges, professional practices they found effective, the current instrumentation they were using with their programs, and in completing the annual performance report (APR).

Following the final sessions held as this contract ended, the State Evaluator sent the evaluators a comprehensive 76-page PDF on measuring youth program outcomes[v]. The document includes an in-depth guide summarizing a list of out-of-school time (OST) instruments that program evaluators could consider using in their professional practice. Moreover, the State Evaluators followed up via email, in-person, and by telephone with local evaluators to see whether they have used any of the draft measures, indicators, and outcomes. Some local evaluators wanted to reconvene and have a further discussion on identifying a set of interim program indicators and outcomes. Due to contract end, the State Evaluator was unable to hold those meetings.

At the time of this writing, the dedicated email address, has been shut-down. Local evaluators have been advised to contact their Resource Center with any questions until the new State Evaluators begin.

Technical Evaluation Brief on Risk Assessment: Requested Review of Risk Assessment Documents June 2016

Prepared by The State Evaluator for NYSED 21st CCLC Managers; Additional to Contract

Review Overview

The New York State Manager for the 21st Century Community Learning Centers Grant Program asked the State Evaluators (The State Evaluator) to research *risk assessment* for her, and provide both some background and a review of existing risk assessment protocols. This is a report of that review.

The State Evaluator first researched the background to risk assessment, and expert consultant recommendations regarding why it is put in place, the results it is expected to provide, and strategies for 'pass-through' federal grantees to use when using risk assessment as part of their sub-grantee management strategy. The State Evaluators then turned their attention to existing risk assessment protocols both for 21st CCLC sub-grantees in other states and for funding recipients in other states (where risk assessment has been part of their state's grant management practice for some time already). Therefore, Section I of this report provides basic risk assessment background information for NYSED managers, with links to relevant further information. Section II reports via a grid and narrative the primary categories that have been used in designing risk assessment protocols (noting where they come from) and a set of scale-types that have been used in conjunction with these categories.

The State Evaluator can provide more detailed information regarding any part of this document on request.

Risk Assessment Section I: Background to Risk Assessment

"Subrecipient monitoring and management is laid out in Subpart D (see § 200.330 through § 200.332) of the Super Circular" (from website cited below). Any discussion of *risk assessment* is provided through the stipulations of the Super Circular which replaces all previous management and budget regulations pertaining to federal grant recipients, including details of the specifics governing what are known as 'pass-through' federal grants such as the 21st Century Community Learning Centers Grant. The Super Circular also provides details of the responsibilities that the pass-through entity (in this case NYSED) has towards their sub-grantees (in this case 21st CCLC grantees (sic)).

The pass-through entities have pre-award and post-award responsibilities, that are not part of this report except to note that the use of *risk assessment* is stipulated among the post-award responsibilities.

As summarized at http://www.plantemoran.com/perspectives/articles/2014/pages/pass-through-entities-responsibilities-for-subrecipient-monitoring.aspx as the pass-through entity, NYSED is required to perform the following to adequately monitor sub-recipients after their initial reward is made:

1. Perform risk assessment to tailor their subrecipient monitoring activities (extent and magnitude) to each subrecipient based on the assessed risk.
2. Perform appropriate and ongoing monitoring of each subrecipient, including:
    a. Review any reports that the pass-through entity requires of the subrecipient
    b. Verify subrecipients have audits, as needed
    c. Consider how to address subrecipient noncompliance
    d. Issue a management decision for audit findings of the subrecipient within six months

e. Perform on-site reviews
f. Provide training and technical assistance to sub-recipients
g. Contract for an agreed-upon procedure engagement for monitoring

This is important: The results of the risk assessment is supposed to drive the extent of the monitoring activities performed by a pass-through entity on its subrecipients. the risk assessment is designed to be a management decision-making tool for NYSED to use to streamline their oversight of sub-grantees.

Performing Risk Assessment to Streamline Oversight

The process of setting up the risk assessment protocol, including setting the appropriate level of monitoring to be performed, developing a protocol for iterative sub-grantee risk assessment review, development of a work plan and individual recipient monitoring strategies, and setting 'monitoring levels' for sub-grantees (for example, based on other state risk assessment protocols detailed in the next section of this report, moderate risk may mean desk audit of program materials and frequent telephone contact regarding areas of concern and high risk may mean in-person monitoring visit(s) and detailed quarterly reports).

A number of 'experts' reviewed for this brief noted the need to set-up a set format of a subrecipient monitoring plan to ensure overview documentation. These are not federal guidelines, please note, but 'collect complete data of your activities' sorts of recommendations.

The website provided earlier says that such a plan will document the following components:

- Monitoring plan objectives
- Description of the risk analysis and results
- Classification of each subrecipient's risks
- Monitoring activities and monitoring schedule for each subrecipient on assessed risks
- Pass-through entity's planned response to any findings, including anticipated actions to be taken in response to findings, and individual's responsibility to ensure proper action is taken, and the expected timeframe
- Trainings that the pass-through entity intends to provide to subrecipients

It is also recommended that each pass-through entity have a Subrecipient Checklist, designed to be unique to each subrecipient, and documenting the process of subrecipient management and monitoring. This is the subject of Section II of this brief.

Risk Assessment Section II: Subrecipient and Risk Assessment Checklists

As noted, all expert documents reviewed for this brief recommend that pass-through entities develop a Subrecipient Checklist as well as a Risk Assessment Checklist.

NYSED already tracks their work with subrecipients, therefore, the recommendations for the Subrecipient Checklist are listed here as information only as are the descriptions of their use.

Subrecipient Checklist

Subrecipient Checklists are recommended to contain:

- Name of the Client
- CFDA number
- Suspension and debarment check
- Agreement – the 15 data elements included in the Super Circular
- Scope of work to be performed by the subrecipient
- Monitoring Plan
- Monitoring activities documentation (dates, who performed)
- Monitoring results
- Follow-up documentation

And can be used it as a means to:

1. Address and document the process of subrecipient management and monitoring
2. Track the various to-do items the pass-through entity needs to complete to accumulate information during both the pre-award and post-award phase
3. Document having performed the required monitoring activities (see list above)

Risk Assessment Checklist and Review of Those of Others

As stated by Plante Moran:

> The pass-through entity should consider developing a checklist to document the risk assessment process and record the rationale for assigning subrecipients to certain risk categories.

NYSED managers are considering the use of such a checklist. The remainder of this brief will (1) present typical categories used in risk assessments being used in other states; (2) present typical point systems being used in the risk assessment reviewed; and (3) present the score parameters for differing levels of monitoring based on the reviewed risk assessments.

Risk Assessment Categories with Examples of Items within Each Category

FISCAL					
A. Level of Funding: A surprising number see the level of funding as a risk factor, the higher the funding the greater the risk.					
(#) = Number of Levels to Scale	**Low Risk Score**		**Moderate Risk**		**High Risk Score**
1) Cut the funding levels by quartile (5)	1st Quartile = 0	2nd Quartile = 2		3rd Quartile = 4	4th Quartile = 5
2) Cut to five levels (5)	Lowest = 0	Slight Increase = 2	Lge. Increase = 3	10x prior $ inc. = 4	Highest = 5
3) Three levels only (10)	1		4		8
4) Three levels only (10) reverse scale	10		5		0
Although not the most common fiscal area assigned to a risk assessment, interesting in viewing high levels of funding as a risk factor to sub-grantees. Note that example (4) uses a reverse scale where high score = low risk.					
B. Audits and/or Reviews: These specifically scored on audits, the next category includes other fiscal reports.					
1) Audit carried out (5)	No findings = 1			Significant/material findings = 4	No audit = 5
2) Single audit	No findings = 1	Significant deficiencies = 2	Material weaknesses = 3	Both deficiencies & weaknesses = 4	No audit = 5
3) Prior FY audits		Findings = 2	Unresolved = 3		Delinquent = 5
C. Finance Reporting: Many more used Fiscal Reporting as part of their Needs Assessment as with the following:					
1) Reporting is timely x% of the time (5):	100% = 1		80% = 3		≤ 70% = 5
2) Financial reports are timely & accurate (5):	Always = 1		Most of the time = 3		Never = 5
3) Financial reports are (6):		On time & accurate = 2		On time with errors = 4	Not on time, inaccurate, or new program = 6
4) Prior financial reports (10) reverse scale, cumulative scoring:	No issues = 0	Inadequate = 2; Inaccurate = 2; Late = 2			
5) On or nearly on budget (no timeline included) (5):	On, or nearly on, budget = 1		Not on budget with justifiable reasons = 3		Not on budget, no justification = 5
C-1: Other forms of reporting					
6) State Financial Oversight In past 2 years (6):		On-site fiscal review = 2		Fiscal desk review in past 2 yrs. = 4	No review or new grantee = 6
7) Sub-grantee Lack of Financial Oversight (10)	Monthly review of budget vs expenses =0		Sporadic review of budget vs expenses = 5		No monthly review of budget vs expenses = 10
(#) = Number of Levels to Scale	**Low Risk Score**		**Moderate Risk**		**High Risk Score**
D. Budget Alignment and Requested Revisions: Remember that Risk Assessment comes out of accounts management, so there are a few 'takes' on budgets.					
1) Submitted numerous (> 3) budget revisions in the past year (4):	None = 0	1 revision = 1			> 3 = 4
2) Requested budget revisions (10):	0 – 1 = 0		2 = 5		≥ 3 = 10
3) Unallowable purchase requests (10):	No requests = 0		Minimal requests = 5		Multiple requests = 10

4) Budget reflection of approved grant (goals, etc.) (10):	Reasonable allocation of approved grant funds = 0		Loosely related = 5		Does not = 10
5) Expenditures in budget (10):	No requests not in the budget = 0		1-2 requests not in the budget = 5		≥ 3 requests not in budget = 10
6) Unallowable expenses (10):	No unallowable expenses = 0		1-2 unallowable expenses = 5		> 2 = 10
E. Efficient Use of Funds					
1) At the end of last year (10):	Less than 10% of funds unspent = 0		10 – 25% unspent = 5		More than 25% unspent = 10
2) Using subcontractor (5):	None = 1	1-2 = 2		3-4 = 4	5+ = 5
Managing Grants					
A. Sub-Grantee Experience Managing Grants					
1) Prior experience of sub-grantee with federal grants (5):	More than 10 years = 1	5-10 years = 2			No experience = 5
2) Grant management experience (5):	More than 10 years = 1	5-10 years = 2	Less than 2 = 3		None = 5
3) 21st CCLC grant experience (5):	3-4 yrs. with same director = 1	2-3 yrs. different directors = 2	1-2 yrs. original director = 3	1-2 yrs. not original = 4	High mgt. turnover = 5
B. Management and Staff					
1) Program manager effectiveness (10):	Consistent implementation of grant requirements = 0		Unprepared for monitoring and TA visits = 5		Repeated lack of follow-through = 10
2) Program manager effectiveness (10):	No problems = 0		Some internal challenges = 5		Not managing due to internal conflict = 10
(#) = Number of Levels to Scale	**Low Risk Score**		**Moderate Risk**		**High Risk Score**
3) Administrative support of the program (10):	Good administrative support = 0		Little administrative support = 5		No administrative support = 10
4) Staff quality (3):	High quality experienced staff = 1		50% of staff are experienced with relevant qualifications = 2		Little or no staff experience = 3
5) Staff turnover (6):		None = 2	New appointment or move in 1 or more key positions = 4		New or move in administration and/or fiscal officer = 6
6) Key staff changes (10):	No key staff changes = 0		Changes on average once each year = 5		Changes more than once each program year = 10

7) Program has a new program director (10):	An average of every two years or more = 0		Every 1 – 2 years = 5		More than once each program year = 10
8) Partners (10):	Active partner(s) = 0	Minimal active partners = 3	Minimal partner outreach = 5		No active partners; significant changes in partners; no partner outreach = 10
C. Reporting on Grant Progress					
1) Required Progress Reports (5):	Timely, meets requirements = 1	Timely = 2	Timely does not meet requirements = 3	Late, meets requirements = 4	Late, does not meet requirements = 5
2) Required Progress Reports (6):		Timely and Accurate = 2		Timely with errors = 4	Not on time, incorrect, or new program = 6
3) Required Progress Reports (10):	5/less days late=0		5-29 days late = 5		30+ days late = 10
(#) = Number of Levels to Scale	**Low Risk Score**		**Moderate Risk**		**High Risk Score**
4) Program Performance Reports (5):	Timely and exceeds requirements = 1	Mostly meets requirements = 2	Does not meet requirements = 3	Late, mostly meets requirements = 4	Late, does not meet requirements = 5
5) Reports (10):	Satisfactory = 0		Late or insufficient = 5		Not completed, unsatisfactory = 10
6) On review of progress report (10):	Activities and services consistent with grant = 0		Some activities and services not consistent with grant = 5		Activities and services not being met = 10
7) On program performance goals (10):	All PPG's met = 0		75% or more PPG's met = 5		Less than 75% of PPG's met = 10
D. Reporting on Monitoring & Corrective Action					
1) Monitored (10):	No measure = x	Monitored within the past 2 yrs. = 2			Not monitored within the past 2 yrs. or is new = 8
2) Indicators from monitoring need attention (10):	One or fewer need attention = 0		2-5 need attention = 6		More than5 need attention = 10
3) Corrective action needed (10):	One or fewer need attention = 0		2-5 need attention = 6		More than5 need attention = 10
4) Monitoring findings (5) **reverse scale**:	No findings = 5				Numerous findings = 1
5) Implement corrective actions from monitoring (5):	None needed = 1	Addressed in a timely manner = 2			Not addressed = 5
6) Monitoring finding with actions (5)	No or minor findings, timely action = 1	Some moderate findings, action not timely = 2	Moderate findings, action not timely = 3	Some findings, action not timely = 4	Not monitored = 5

Performance (Including Compliance)					
A. Participant Enrollment and Attendance					
1) Enrollment and	100% of goal = 1		80% of goal = 3		Less than 70% of goal = 5
2) Retention (same Risk Assessment) (5):	100% of enrolled = 1		80% of enrolled = 3		Less than 70% of enrolled = 5
3) Timeliness of enrollment (5):	100% within first 30 days =1	95% within first 30 days = 2	90% within first 30 days = 3	85% within first 30 days = 4	70% within first 30 days = 5
(#) = Number of Levels to Scale	**Low Risk Score**		**Moderate Risk**		**High Risk Score**
4) Achieving time in program-TIP-goal (5):	100% reach TIP goal = 1		90% reach TIP goal = 3		70% reach TIP goal = 5
5) Days in program goal (10):	80% attending 30 days or more = 0		50 – 79% attending 30 days or more = 5		Less than 50% attending for 30 days or more = 10
6) Hours of operation (10):	Meeting required hours = 0				Not meeting required hours = 10
7) Assessment of level of service provision (6):		Grant expected services are provided = 2	Some weaknesses = 4		2 yr. history of some weaknesses or new program = 6
8) Approved program modifications (10):	All change actions are State approved = 0		Minor changes are made without State approval = 5		Major changes are made w/out State approval = 10
B. Program Participation in State Efforts					
1) State provided trainings (5):	Appropriate staff attends all trainings and meetings = 1			Appropriate staff does not attend all trainings and meetings = 5	
2) Regarding PD and all trainings (10):	Attend all = 0		Attend some = 5		Does not attend = 10
3) Complete state support requirements (5):	Staff have done all the activities = 1	Staff have attended most activities = 2	Staff have failed to attend most activities = 3	Staff lack experience and training to do the job = 4	This program has a high staff turnover = 5
4) Attend meetings as required by State managers (5):	Attend all meetings = 1	Attend most meetings = 2	Attend some meetings = 3	Attend required meetings = 4	None = 5
5) Communication with State managers (5):	Always responds to State communication = 1		Seldom responds to State managers = 3		Never responds to State managers = 5
6) Communication (10):	Timely response to communication = 0		Slow response to communication = 5		No response to communication = 10
7) Responsive to State requests (5):	Timely always = 1		Usually = 3		Rarely = 5

Conclusion

This is a briefing paper for NYSED 21st CCLC managers to use as a resource as they consider Risk Assessment in New York. The review presented contains information from 21st CCLC programs in other states as well as risk assessments for other federal pass-through grants being managed, again, outside of NY. RWI could not find any established risk assessments in NY.

SECTION FIVE: CONCLUSIONS & RECOMMENDATIONS

Effectiveness of the Two Regional Resource Centers

The New York City Resource Center

The New York City Department of Education (NYCDOE) was awarded the contract for provision of the compliance and support services of the New York City Resource Center (NYC-RC). This connection between the NYC-RC and the NYCDOE had both a positive and a negative effect. The DOE provided good employee working conditions for the RC staff, and possible personal professional growth within the large, urban school system. It also meant that the NYC-RC staff were considered by some as part of the NYCDOE and thus there to provide deep services to NYCDOE Sub-grantees. NYC-RC staff answered first to their employers, which is not surprising. As the contract progressed, more of the Resource Center staff time was devoted to NYCDOE Sub-grantees. Indeed, when asked about their experience with the NYC-RC in July of 2016, most CBO Sub-grantees in New York City indicated that they did not know there was a resource center for their support in New York.

The Resource Center staff did try to coordinate some citywide professional development activities, and were successful in doing so for the first two years of the Round 6 Sub-grantee programming. It was determined, however, that it was more effort and cost effective to offer the professional development at the City Kick-off and June meetings.

The NYC-RC staff were responsible for all Monitoring Visits made to non-NYCDOE Sub-grantees, and contracted out the NYCDOE Monitoring Visits to a contractor. All Monitoring Visits were complete by June 2016.

The Rest of State Resource Center

The Capital Region Board of Cooperative Education Services (Capital Region BOCES) was awarded the contract for provision of the compliance and support services of the Rest of State Resource Center (ROS-RC). Two staff were hired for the ROS-RC, neither of whom had any prior experience with the 21st Century Community Learning Centers Program, or with the planning and delivery of Technical Assistance. In the case of the ROS-RC contract, the Capital Region BOCES stated their intent to provide all required services without contractors, except for the development and maintenance of the program's resource website. The ROS-RC staff arranged both in-person and Web-based professional development sessions into the second year of the Round 6 Sub-grantee period, and transitioned to provision of that part of their contracted services during the Fall Kick-off meeting.

Resource Center Conclusions and Recommendations

RECOMMENDATION: REGARDING MONITORING VISIT TIMING AND INFORMATION UTILIZATION

NYSED should consider a time sensitive plan to complete all Monitoring Visits within six months of funding award. To facilitate that goal, the State Evaluators recommend that the bulk of the content of the Monitoring Visits should be done as a desk audit, thus freeing valuable time to visit and work with the non-compliant programs, and to visit those who are compliant as Consultation Visits.

RESOURCE CENTER CONCLUSION REGARDING TECHNICAL ASSISTANCE SUPPORT

As explained in detail in this report, the State Evaluation found that the two Resource Centers were not effective in providing Resource Center initiated support of the Sub-grantee programs.

The State Evaluation has identified some of the causal characteristics that led to this finding. We include them in summary here to encourage NYSED Managers to consider setting policy and procedures that could address these points.

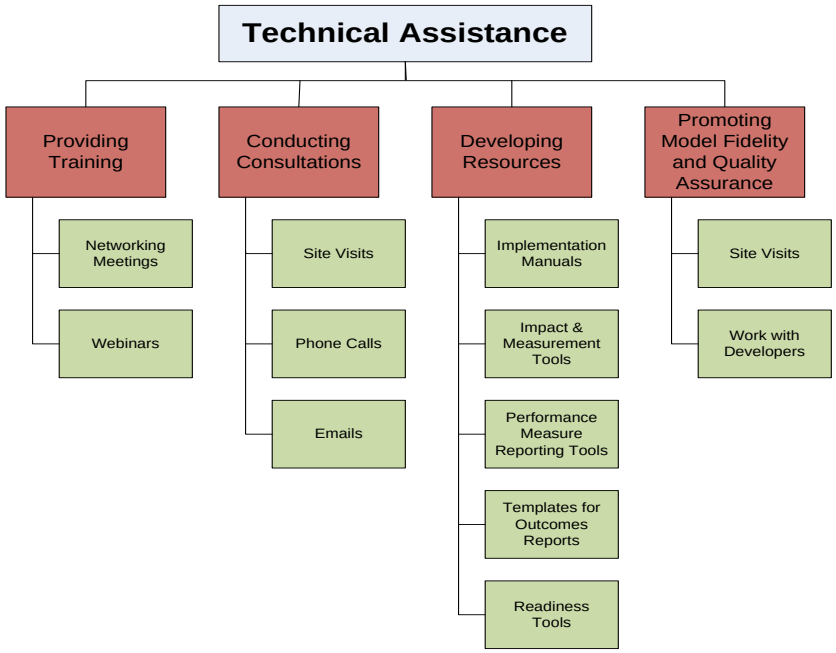
They are:

1. New York is a large state of more than 55,000 square miles. The New York State Education Department has closed most of its Field Offices, maintaining one in New York City, but none in other areas of the state. NYSED 21CCLC Program Managers are based in Albany. Of necessity, NYSED operates this federal pass-through in a siloed-management format. More direct supervision of the operations of the Resource Centers was and would be impossible for those managers to do efficiently or effectively.
2. The Center providing support and monitoring services to all of the State outside of New York City (the Rest of State Resource Center/ROS-RC) had two staff and a catchment of more than 54,000 square miles. The NYC-RC had 2.5 staff, had out-sourced most of its required services, a catchment of less than 1,000 square miles, and still was relatively unknown by the NYC Sub-grantees after four years of operation. The State Evaluator's conclusion is that the RC staff waited to be approached by Sub-grantees, and Sub-grantees did not know what the role of the RC was so did not approach them.
3. In addition, the following are noted:
    a. There was no organizational support for their director detailed in the NYC-RC Contract Proposal. There was a 'mentor' named in the ROS-RC Contract Proposal. However, when the State Evaluators interviewed the person named, she stated that she had never heard of this contract and mentoring the center director was outside the scope of her position. This was reported to NYSED in the first year of Round 6.
4. This also negatively affected the identification and sharing or both *promising practices* and *best practices* in the program. For example, the State Evaluators know from site visits to the Resource Center Offices and interviews with the RC staff, that both RC directors knew that programs should have been networking with one another and that there were Sub-grantee leaders emerging among the Round 6 funded programs, but they did not know how to facilitate the networking, identify the initial good practices, and how to then use these program generated resources to support the improvement and growth of underachieving programs.

Recommendation Regarding Clarification of Technical Assistance Offered and Provision of TA by Resource Centers

The State Evaluators recommend that a committee of representatives drawn from NYSED Managers, Resource Center Directors, and Sub-Grantee Managers review the Technical Assistance Framework provided here. Starting from that point they should be tasked with identifying the components necessary to provide high quality and in-depth TA, and then develop a plan to design and implement capacity building TA for the Sub-grantees in New York.

Recommendation Regarding the Online/Digital Support System



The Online/Digital Support System must be accessible and functional in both directions: out to the Sub-grantees and in from them. Sub-grantees should be encouraged to share their experiences, promising practices, operable assessments, and other program system information with one another in a facilitated (and edited) controlled environment. Open Source platforms (such as MOODLE) provide discussion spaces, library applications, and online instruction modules, for example. The utilization of social media outlets would certainly be helpful in this endeavor as well, such as a central Facebook page dedicated to NYS 21st CCLC programming.

Recommendation Regarding Administrative Support to Sub-Grantees

Immediate development of an Implementation Manual designed for Sub-grantee use would cut-down and curtail time and resources spent asking and answering procedural questions regarding Sub-grantee compliance with Federal and State reporting requirements.

Recommendation Regarding Professional Development Support

Context: The quality and effectiveness of Technical Assistance provided to Sub-grantees would be greatly improved if it focused both on supporting NYSED Sub-Grantee Compliance Reporting, and in building Sub-grantee capacity through training and support in service delivery management and continuous program improvement.

Recommendations: The Professional Development portion of Resource Center contracts should be both specific and fluid. Specific in that they should be based on valid Sub-grantee needs assessments as well as NYSED identified support needed to complete their Grantee Compliance responsibilities. Both purposes can operate simultaneously, NYSED should focus on both. Any feedback from participants in

the professional support provided by the Resource Centers should be available to the State Evaluators directly, and reported to NYSED Managers as it effects all aspects of Sub-grantee management.

Focus Schools and the Annual Performance Report (APR) Conclusions and Recommendations

FOCUS SCHOOLS CONCLUSION

The details of the general findings from the State Evaluation's required program site visits were provided in that section of this report. Here we provide a seminal finding regarding Sub-grantee program delivery and a consistent issue among many of the site visit programs. This was also raised often in the Quarterly Meetings with NYSED Managers, in written evaluation reports, during Regional Evaluator Meetings, and during formal interviews as well as informal conversations with Sub-grantee managers and staff, and Resource Center directors and staff. Explanation of the finding and recommendations to address them are presented here as 'Delivering the Required Program Content', below.

Delivering the Required Program Content: A Complex Recommendation

At the end of a five-year State Evaluation, the State Evaluators conclude that there is no proof that any of the Sub-grantees or their program's partner school(s) purposely broke any of the federal or State rules regarding this program. The 21st Century Community Learning Centers Program is unique for an Education program. Schools (principals, teachers, superintendents) expect Education programs to be about instruction, remediation, test preparation, and other common strategies to 'directly' improve student academic performance. The assumption is that if administration signed an agreement to cooperate with the program they would know what the required specifications of the program are has been shown to be ill informed. The reasons for that are varied, but consistent, and not the topic of this report. That it is the case is the point here.

NYSED has set as a requirement that all applications for sub-grants have to be prepared as a collaborative effort across all stakeholders identified in the application. The five-year State Evaluation reported here has found that the importance of that fundamental sub-grantee program requirement. that all involved stakeholders have to be involved in all aspects of planning, implementing, and assessing the 21CCLC program, is all too often ignored. The involvement of these stakeholders (i.e., partner school administrators and teachers, Sub-grantee project director, Sub-grantee site coordinator(s), parents/principal caregivers, local community organizations management and staff, etc.) would communicate the unique characteristics of this program efficiently and effectively. In the few cases where this was found to be the case, the full program does well, and when problems are encountered they are addressed efficiently, as verified by this State Evaluation.

The State Evaluators found that it is this lack of understanding that most often is the cause of Sub-grantee inability to enforce the signed agreements for full cooperation by partner schools, for example, and thus may be unable to provide all the program required components to participants. Whenever the State Evaluation encountered this circumstance, it was most often the case that those outside of the Sub-grantee managers did not have a clear understanding that this is a complex program treatment with a set of expected outcomes that cannot be achieved with a traditional intervention. Indeed, the State

Evaluators met many Sub-grantee manager who also did not know about the funder requirements, and the State's goals for this program.

Recommendation: Delivering Required Program Content

The evaluators recommend that the requirement that all stakeholders participate in the program's planning, implementation and assessment be enforced. [For possible mechanisms of support, see the General Recommendations, following.]

Annual Performance Report (APR) Conclusion

Without the full commitment of the New York State Education Department there is nothing that the State Evaluators of the 21st Century Community Learning Centers Program can do about the lack of actual data on how the Sub-grantee programs are operating and performing. There can be no data-informed recommendations in real time for State Managers' attention, with the result that without performance data the 21st CCLC Program System in New York will consistently fail to build on its strengths and to 'nip weaknesses in the bud' to support data-informed positive change for improvement. One thing the State Evaluators have found and reported to NYSED that undermines Sub-grantees' sense of value is that this lack of real-time, clear, actionable information means NYSED Managers can only praise in general the excellent work being done in this program by Sub-grantees all over the State, and ignore the few programs that are not doing the job.

The Annual Performance Report changed during the period of this contract, going from an old platform computer based collection system to a new system recently designed and implemented for the US Department of Education. This had been discussed in three sections of this report: Executive Summary, Introduction, and the Section on the APR. This report has explained the loss of efficiency and effectiveness to NYSED management because the State does not have an electronic data collection system for this complex program. We have also discussed in some detail how this also limits a broad spectrum of operations of this program at the State and Sub-grantee levels. For example, without an electronic data capture system that collects real-time, data-based information, the ability for NYSED Managers to make informed decisions regarding the probability of achieving expected State performance outcomes is seriously undermined. Sub-grantees spend time and effort, and evaluator budget, compiling the reporting version of the data necessary to generate the APR numeric information, but have no use for that level of aggregation in their own management and evaluation. We have also argued that this is true for NYSED at the State level as well, a simple participant coded input data collection system would provide much needed, real-time data based actionable information. The full discussion is contained in the body of this report, the recommendation is one the State Evaluator has been making to NYSED Managers for nearly a decade.

Recommendation Regarding the Annual Performance Report

The State Evaluator continues to encourage NYSED Managers to develop a State Level APR Data Capture System that will allow them (and their State Evaluators), Sub-grantee managers (and their local evaluators) to generate management and program delivery decisions using data-based and data-informed information to ensure a high probability of acceptable State and program performance.

General Recommendations

Two General Recommendations

On award of new Sub-grantee funding, and bi-annually thereafter, NYSED should hold a required new Sub-grantee meeting to which each Sub-grantee must bring: administrative and teaching representatives from each partner school, and district if appropriate; representatives from each organization represented on their Advisory Board; and relevant program staff, i.e., budget manager, program manager, and all site coordinators. This meeting should present: *An Implementation Manual; program requirements to qualify for annual funding renewal, agreements to work with NYSED and its Support and Management Team for signature; breakouts for the scope and responsibilities of each group attending, etc.*

The State Evaluators conclude that it is impossible for NYSED, based in Albany and staffed at present levels, to supervise the field to the extent necessary to ensure the support necessary to facilitate the positive performance of all Sub-grantees is provided efficiently and effectively. Having discussed this with the NYSED Managers, the State Evaluator is aware that to hire more NYSED staff to support this program through the civil services would entail a great deal of time and questionable results, without the ability to place them 'in the field' throughout the State, which is the point of this recommendation. While the discussion at NYSED goes forward on the issues of increased staff for Management of the Sub-grantees and the RC Support of them, we recommend a Management Support non-bid contract be awarded for these supporting services immediately.

Five copies of all referenced reports and briefs were sent to NYSED with the initial Draft of this report as a separate document, *21st Century Community Learning Centers Program Briefs, Reports, and Summaries 2012-2017.*

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[i] Barton, R. (Ed.) (2004, November). *Technical Assistance Guidelines.* Northwest Regional Educational Laboratory.

[ii] Godfrey, M. et al. (2002). Technical Assistance & Capacity Development in an Aid-Dependent Economy: The Experience of Cambodia. *World Development,* 30(3), 355-373.

[iii] EPIS Center, 2015. EPIS Center University of Pennsylvania, University Park, PA. Downloaded by K. Toms from: http://www.episcenter.psu.edu/technical-assistance on 3/30/17.

[iv] According to Van Egeren, Wu, Yang & Reed (2007)[iv], program dosage has three components:

- Intensity – the amount of time youth attend a program within a time period;
- Duration – the time from start to finish; and
- Breadth – Variety of activities youth participate in within and/or across programs.

What these researchers found was that teachers reported greater improvement among students who attended more 'intensely'. In other words, students that receive 90 hours of programming showed more academic improvement if they received that dosage over a compressed period.

[v] From Soft Skills to Hard Data: Measuring Youth Program Outcomes, 2nd Ed. The Forum for Youth Investment.