

21st Century Community Learning Centers (CCLC) Grant Closing Guidelines for Local Education Agencies, Community Based Organizations and Faith Based Organizations

The Mississippi Department of Education's (MDE) 21st Century Community Learning Centers (CCLC) program office has developed the following guidance relevant to the closing-out of a 21st CCLC grant award (i.e., following the five-year funding cycle) in accordance with the Education Department General Administrative Regulations (EDGAR), 34 CFR, Part 75 (Direct Grants Program), EDGAR, 34 CFR, Part 76 (State Administered Programs), EDGAR, 2CFR 200 (Uniform Administrative Requirements, Cost Principals, and Audit Requirements for Federal Awards). Sub-grantees are encouraged to review this guidance and other applicable State and Federal regulations concerning the close-out procedures of a Federal grants. (*MDE Standard Grant Terms and Conditions-Termination*)

- Termination can be in whole or part by either the LEA or MDE if funds are supporting the grant are reduced or withdrawn. Either party must submit a 30-day notice to the other party in writing and specifying the effective date thereof.
- Availability of funds obligation of MDE to proceed under the agreement is conditioned upon the appropriation of funds by the Mississippi State Legislature and the receipt of state and/or federal funds. In this scenario, MDE shall provide 10 working days' notice in writing of the termination.

Procedure

Process 1: Year End Performance Review-Records Retention (*MDE Standard Grant Terms and Conditions-Access to Records*)

All financial and programmatic records, supporting documentation, statistical records (i.e., data collection records) and other records required by the terms of the grant, by program regulations and/or by policies, (that are in any way pertinent to the grant) must be retained for five years after the entire grant comes to a close. The starting date of the retention period starts on the day the sub-grantee submits to MDE its last Final Expenditure Report (FER). The last FER is due by September 30th of the year in which the grant comes to a close. For example, the FER for sub-grantees initially funded on 7/1/14 during fiscal year 2014-2015 was due by 9/30/15. The same sub-grantees became fifth year sub-grantees during fiscal year 2018-2019 with the last FER being due by 9/30/19. The 2018- 2019 FER was submitted on 8/30/19. All records beginning with 7/1/14 for this grant must be made available for auditing and monitoring purposes through 8/30/19.

Per the 21st CCLC Nonregulatory Guidance (USDE, 2003), the following items should be retained for a period of **five** years:

- All financial records, including records generated by vendors providing services, (expenditure reports, inventory logs, time sheets, contracts, etc.)
- Programmatic records (lesson plans, field trip agendas/logs, student/staff sign-in sheets, etc.)
- Data reports (evaluation, data collection, 21APR reports, etc.)
- Any other records required by MDE per the grant terms (*MDE Standard Grant Terms and Conditions*)

It is highly recommended that the fiscal agent collect all records from contractors upon completion of each contract or make sure that contracts contain language requiring independent contractors to retain all 21st CCLC records for the length of time specified in this guidance.

The starting date of the retention period begins on the day the grantee submits to MDE its final set of requested documents. This date is specified by MDE.

If any litigation, claim, or audit is started before the expiration of the 5-year period, the records shall be retained until all litigation, claims, or audit finding involving the records have been resolved and final action is taken.

- All records, including programmatic and fiscal records of contractors compensated for services with grant funding, must be retained following the same procedures and timelines listed above. This includes receipts, purchase orders, invoices, and any other documentation to support expenditures.
- Grantees are responsible for maintaining **ALL** records justifying any 21st CCLC expenses including records generated by vendors/contractors who provided services to the program.
- A written descriptive, narrative must be provided to MDE as to how the retention and storage of all relevant records, reports, files, and documents will be stored and maintained.

Process 2: Inventory of Equipment and Supplies

Equipment: EDGAR, 2 CFR, Part 200.33 defines “equipment” as tangible, non-expendable, personal property having a useful life of more than one year. In addition, “supplies” are defined as all tangible personal property other than those described in 200.33. In essence, everything except equipment is considered supplies.

The State of Mississippi Standard Grant Terms and Conditions, Surrender of Equipment outlines the mandates of collaboration as a joint closing inventory to assure the equipment is appropriately assigned.

- If the program continues after the grant expires, the grantee may retain equipment and supplies purchased with 21st CCLC funds for the ongoing propagation of the program. The grantee will need to submit a letter to MDE regarding their intentions.
- If the school/CBO/FBO will not continue to have an afterschool program, the grantee must first offer to transfer the equipment, supplies, and other purchased items to other federally funded 21st CCLC programs within the district/area of the current grant; and then to other federal education programs, such as Title I funded programs. An Equipment Inventory List and Equipment Transfer form must be completed and maintained in the records.

EDGAR 200.313: If there is a residual inventory of unused equipment and/or supplies exceeding \$5,000 in total aggregate fair market value upon termination (close-out), the equipment/supplies should first be offered to another 21st CCLC program within the district/area. If they are not needed by another 21st CCLC program, the equipment/supplies may be offered to another federally sponsored school/program/project within the community. (Less than \$5,000 has no grantee obligation)

If no federal program accepts the property/equipment and supplies, disposition of the equipment and other purchased items will be determined by the MDE. Please consult the 21st CCLC State Coordinator for instructions.

Grantee Responsibilities

Grantees remain responsible for the following:

- Providing data to be submitted to the federal 21 APR system
- Provide programmatic, financial, evaluation, and other information as requested by MDE
- Submission of all performance reports and other records as required as a condition of the grant within 90 days or the required due date set by MDE after the termination of the grant

Equipment Inventory and Disposition Records:

MDE will provide written approval/denial of the equipment disposition request within thirty (30) days after receipt of request. Equipment Disposition Requests along with a copy of the Equipment Inventory should be mailed or e-mailed to MDE's 21st CCLC Grant Coordinator.

Sample form from 21st Century Toolkit: Equipment Inventory of Purchases

Process 3: Final Budget Requests for Funds

All Request for Funds Forms, approved by an authorized MDE personnel, must be submitted via the 21century@mdek12.org and approved by MDE prior to July 30th of the year in which the grant period ends.

Process 4: Final Evaluation Reports

All performance reports and other reports required as a condition of the grant, must be submitted to MDE within 90 days or the required due date set by MDE after the termination/closeout of the grant [2 CFR 200.339-200.343 of EDGAR]. This would include submission data required for the 21 Annual Performance Report (APR) system as well as the required Final Expenditure Report (FER).

Process 5: Sub-Recipient Monitoring

Compliance and Performance Assessment: MDE will conduct a review of all closeout sub-grantee financial records. The financial records will include all years of the grant. The review will be conducted via desk audit and/or visit by MDE personnel. Sub-grantees will be contacted by MDE staff to coordinate and discuss the documents needed for the review.

Please review sections labeled Cross-Cutting Indicators and 21st Century Community Learning Centers Indicators of the MDE Consolidated Federal Programs Monitoring Instrument.

Process 6: Post-Closeout Adjustments and Continuing Responsibilities

The termination/closeout of a grant does not affect:

- MDE's right to disallow costs and recover funds based on a later audit or other review;
- The sub-grantee's obligation to return any funds due because of later refunds, corrections, or other transactions; ^[1]_[SEP]
- Records retention as required by MDE; and ^[1]_[SEP]
- Audit requirements in accordance with Mississippi's Single Audit guidelines and requirements.

Final Closeout

- MDE will close out a grant when it determines that all applicable administrative actions and all required work of the sub-grantee have been completed.
- Sub grantees will receive a 21st Century Closeout Acknowledgement notice that should be maintained in the LEA/CBO/FBO records.

Applicable Federal and State Guidelines

All sub-grantees are required to know and are held accountable to the rules and regulations that govern the 21st Century grant. Below is a list of resources that will assist you as you process the closing of your grant:

USDE Non-Regulatory Guidance

<http://www.ed.gov/programs/21stcclc/guidance2003.doc>

EDGAR (Education Department General Administrative Regulations)

<http://www.ed.gov/policy/fund/reg/edgarReg/edgar.htm>

Title IV, Part B-21st Century Learning Centers

<http://www.mde.k12.ms.us/OFP/21st>

Grant Closeout Checklist

The 21st CCLC staff compiled the following list of items to consider when you are closing out a 21st CCLC grant. Some items may not apply to your situation. Additional actions may also need to occur. An important detail to note is that many of these items will need to commence after the grant period ends on June 30th of the closing year. Plans will need to be made for completion of all appropriate items.

- Notify of program closing, in writing:
 - a. Your Staff;
 - b. Your Partners;
 - c. Parents/ All other program Stakeholders.
 - d. Families/Legal Guardians and Students;
 - e. Governing Authority/Board;
 - f. Sponsors (for Community Schools); and
- Have you provided a clear written timeline of the closing procedures to all program stakeholders?
- Have all appropriate agencies been contacted about procedures to handle changes in status for:
 - a. Unemployment Insurance;
 - b. Workers Compensation;
 - c. Employment Benefits; and
 - d. Federal, State, and Local Taxes?
- Are plans made to issue W-2 forms for income taxes?
- COBRA benefits and when medical benefits will end.
- Close out all contracts.
- Take appropriate action on uncashed checks.
- Collect and void all unused checks.
- Take appropriate action on pending invoices.
- Take appropriate action on bank accounts (i.e. close accounts once all transactions are cleared).
- Have plans been made for a final A-133 audit and any audit resolutions?
- Take appropriate action to complete the Sub-Recipient Monitoring review (Cross-Cutting and 21st Century Community Learning Centers Indicators of the Consolidated Federal Programs Monitoring Instrument).
- Have all appropriate MDE personnel been contacted (21st Century Coordinator and Federal Programs Finance Director)?
- Have all budget requests been submitted and approved by MDE?
- Submit all required reports (i.e. 21 APR, FER).
- Have you completed a final evaluation and prepared a summary?
- Take appropriate actions relating to the transfer and/or disposition of equipment and supplies.
- Update Equipment and Supplies Inventory and Disposition Records.
- Plan to retain all records associated with this grant for five (5) years.
- Have plans been made for your facility?
- Have you notified your transportation provider(s)?
- Has your website been updated?
- If different from location identified in grant applications, have you notified MDE's 21st CCLC Coordinator of the location that will house your program records?