21st Century Community Learning Centers (CCLC) Grant Closing Guidelines

**Policy:** The Indiana Department of Education's (IDOE) 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 four-year funding cycle) in accordance with the Education Department General Administrative Regulations (EDGAR), 34 CFR, Part 74, EDGAR, 34 CFR, Part 80, and State of Indiana guidelines. These policies are intended for use to guide record retention, equipment inventory, and supplies inventory for a 21st CCLC program that will not be continuing. Sub-grantees are encouraged to review this guidance and other applicable state and federal regulations concerning the close-out of a Federal grant.

**Procedures**

In year four of a grant period, sub-grantees are required to complete an End of Year (EOY) Report and an Inventory Report to 21CCLCprogram@doe.in.gov within 60 days of their contract end date.

**Records Retention**

All financial and programmatic records (such as payroll, semi-annual certifications, etc.), supporting documentation, statistical records (i.e., data collection records) and other records required by the terms of the grant or program regulations and policies, must be retained for five years after the grant closure. The starting date of the retention period starts on the day the sub-grantee submits to IDOE its last Final Expenditure Report (FER). The last FER is due by May 31st of the year in which the grant comes to a close.

All records, including the programmatic and fiscal records of contractors compensated for services with 21st CCLC grant funds, must be retained following the same procedures listed in the preceding paragraph. This includes keeping purchase orders, invoices, receipts, and related documents to support expenditures. Sub-grantees are responsible for maintaining all records justifying the expenditures of 21st CCLC grant funds, including records generated by vendors contracted to provide services. 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.

**Equipment and Supplies**

**Equipment:** EDGAR*, CFR 34, Part 80.3 defines "equipment" as tangible, non-expendable, personal property having a useful life of more than one year. Further definition defines "equipment" as a material unit that retains shape and appearance with use, is an investment of money, and does not lose its identity through incorporation into a more complex unit or substance. A bookshelf would be an example of an item classified as “equipment”.

---

*EDGAR* = Education Department General Administrative Regulations
State Surplus Disposition Agent Manual mandates that current and accurate inventory records and related activities be kept, no matter what the cost for Technology Equipment. Technology equipment can be, but is not limited to desktop computers, laptops, notebooks, servers, and personal digital assistants (PDAs); including but not limited to palm pilots, blackberries, and smartphones. If a device has a computer chip or can be used with an item that contains a computer chip, it is considered Technology Equipment.

Your program’s property and inventory policy, disposal policy, and supporting documentation for items identified as "equipment" should be retained for five years following the close-out of the grant, as specified in the preceding paragraphs regarding records retention. All equipment items must be tagged and identified within the property and inventory records.

Per EDGAR, CFR 34, Part 80.32; if the program continues once grant funds cease, the program may continue to use the equipment that was previously acquired. As part of the close-out of a grant, subgrantees must offer to transfer 21st CCLC equipment/capital to other programs or projects currently or previously supported by Federal funds, such as other 21st CCLC programs located within the district/area of the current grant first and then to other federal educational programs such as Title I. Such transfer of equipment cannot interfere with use by the program/project for which it was originally intended. Inventory/property records should reflect the status (i.e., transfer) of equipment upon termination of the grant. If no Federal program accepts the equipment, disposition of the equipment must be approved by IDOE. Upon receiving approval, these items may be retained, or auctioned and IDOE shall have a right to an amount calculated by multiplying the current market value or proceeds from the sale by IDOE’s share of the equipment. Proceeds from the sale of the equipment will be treated as program income and must be reported to IDOE, as appropriate.

**Sample Equipment Inventory and Disposition Records:**

**Below is a sample Inventory and Disposition Record regarding equipment including computer hardware and software:**

<table>
<thead>
<tr>
<th>Serial/ID Number</th>
<th>Item Description</th>
<th>Item Location</th>
<th>Purchase Price</th>
<th>Purchase Date</th>
<th>Percentage of 21st CCLC federal funds used for purchase</th>
<th>Current Per Unit Fair Market Value</th>
<th>Condition - Good, Fair, Poor</th>
<th>Disposition Status - Retain, Auctioned, Etc. (if auctioned, indicate date and amount sold for)</th>
<th>If auctioned: Indicate amount &amp; date proceeds returned to IDOE</th>
<th>If transferred: Indicate date &amp; location</th>
</tr>
</thead>
</table>

IDOE 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 21cclcprogram@in.doe.gov.
*For official EDGAR Policy for the Disposition of Equipment Funded from Title Programs, See Appendix A*

**Supplies:** Supplies are defined as items that are consumed in use, lose their original appearance with use, are expendable, are inexpensive, have an expected useful life of under 1 year, and lose identity through incorporation into a more complex unit or substance. Per EDGAR, CFR 34, Part 74.35 and Part 80.33; Residual inventory of unused supplies exceeding $5,000 in total aggregate fair market value upon the termination or completion or a grant, the supplies should first be offered to another 21st CCLC program. If they are not needed in the 21st CCLC program, then the supplies may be offered to another federally-sponsored program (i.e. a school or district’s Title program) or project within that school, district or community. If they are not needed by any federally-sponsored program or projects, the sub-grantee shall compensate IDOE for its share of the cost.

The following sample Supply Inventory and Disposition Record could be used to display supplies with an aggregate value of $5,000 or more:

<table>
<thead>
<tr>
<th>Serial/ID Number</th>
<th>Item Description</th>
<th>Item Location</th>
<th>Purchase Price</th>
<th>Purchase Date</th>
<th>Percentage of 21st CCLC federal funds used for purchase</th>
<th>Current Total Aggregate Fair Market Value</th>
<th>Disposition Status - Retain, Transfer, Etc.</th>
<th>If cannot transfer; indicate amount &amp; date proceeds returned to IDOE</th>
<th>If transferred; Organization &amp; Location Transferred To</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Budget Revision Requests**

All approved budget amendments must be submitted to your 21st CCLC Grant Specialist and approved by IDOE prior to **May 1st** of the year in which the grant period ends. Budget revision requests can only be submitted for future expenses. The revision request needs to be approved by IDOE before you can obligate your grant award following the newly revised budget.

**Reports**

All performance reports and programmatic reports required as a condition of the grant, must be submitted to IDOE within 90 days or the required due date set by IDOE after the termination of the grant [34 CFR 80.50 of EDGAR]. This would include submission data required for EZ reports as well as the required End of Year Report, which is due annually, and the Program Inventory Report, due after year 4 of a cohort.

**Sub-Recipient Monitoring**

Compliance and Performance Assessment: IDOE may conduct a review of all close-out sub-grantee financial records. The financial records will include years three and four of the grant. The review will be
conducted via a desktop audit. Sub-grantees will be contacted by IDOE staff to coordinate and discuss the documents needed for the review.

**Later Disallowances and Adjustments**

The termination or closing of a grant does not affect:

(a) IDOE's right to disallow costs and recover funds on the basis of a later audit or other review;  
(b) the sub-grantee's obligation to return any funds due as a result of later refunds, corrections, or other transactions;  
(c) records retention as required by IDOE; and  
(d) audit requirements in accordance with Indiana's Single Audit guidelines and requirements.

**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:

- U.S. DOE Federal Guidelines
  

- U. S. DOE Non-Regulatory Guidance
  

- EDGAR (Education Department General Administrative Regulations)
  
Suggested 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.

1. Notify of program closing, in writing:
   a. Your Staff;
   b. Your Partners;
   c. Parents/Families/Legal Guardians and Students;
   d. Governing Authority/Board;
   e. Sponsors (for community based and faith based organizations)
   f. all other program stakeholders.

2. If a community school; have you notified your Governing Authority and sponsor of your 21st CCLC program closing?

3. Notify parents/families/legal guardians and students of other possible before and/or after-school care programs including contact information.

4. 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?

5. Are plans made to issue W-2 forms for income taxes?

6. Clarify COBRA benefits and when medical benefits will end.

7. Close out all contracts.

8. Take appropriate action on pending invoices

9. Have all budget revision requests been submitted by May 1 of year 4 of your cohort and approved by IDOE?

10. Submit all required reports (EZ Reports, Inventory, EOY Finance Report).

11. Have you completed a final evaluation and prepared a summary?

12. Take appropriate actions relating to the transfer and/or disposition of equipment and supplies.

13. Update Equipment and Supplies Inventory and Disposition Records.

14. Make arrangements to retain all records associated with this grant for five (5) years.

15. Has your website been updated? Make sure 21st CCLC marketing is removed.

16. If different from location identified in grant applications, have you notified IDOE’s 21st CCLC Grant Administrator of the location that will house your program records?

17. All final reimbursements must be in by July 30, 2018.
Appendix A:

Disposing of Equipment Funded from Title Programs

IC 5-22-22-4 Use of auctioneer
Sec. 4. (a) If the property to be sold is:
(1) one (1) item, with an estimated value of one thousand dollars ($1,000) or more; or
(2) more than one (1) item, with an estimated total value of five thousand dollars ($5,000) or more; the purchasing agency may engage an auctioneer licensed under IC 25-6.1 to advertise the sale and conduct a public auction.

IC 5-22-22-6 Public or private sale or transfer without advertising
Sec. 6. If the property to be sold is:
(1) one (1) item, with an estimated value of less than one thousand dollars ($1,000); or
(2) more than one (1) item, with an estimated total value of less than five thousand dollars ($5,000); the purchasing agency may sell the property at a public or private sale or transfer the property, without advertising.

IC 5-22-22-8 Worthless property
Sec. 8. (a) If the property is worthless, it may be demolished or junked.
(b) For purposes of this section and IC 5-22-21-6(4)(B), property may be considered worthless or of no market value if the value of the property is less than the estimated costs of the sale and transportation of the property. As added by P.L.49-1997, SEC.1. Amended by P.L.7-1998, SEC.11.

IC 5-22-22-10 Exchange of property between purchasing agency and governmental body
Sec. 10. (a) A purchasing agency may exchange property with another governmental body upon terms and conditions agreed upon by the governmental bodies as evidenced by adoption of a substantially identical resolution by each entity.
(b) A transfer under this section may be made for any amount of property or cash as agreed upon by the governmental bodies. As added by P.L.49-1997, SEC.1.