Student Attendance Technical Assistance Paper for 21st Century Community Learning Center (21st CCLC) Programs

The purpose of this technical assistance paper is to inform 21st CCLC programs of the requirements and necessary internal controls for student sign-in and sign-out sheets. Sign-in and sign-out sheets are used as evidence of the safe arrival and dismissal of students from the 21st CCLC program, to confirm the duration of attendance of students in the 21st CCLC program, and to satisfy federal requirements to document evidence of students served by Florida's 21st CCLC program. Below is a series of frequently asked questions to help ensure compliance regarding student attendance in 21st CCLC programs.

Are sign-in/out sheets required?

Yes. All 21st CCLC programs are required, as indicated in Section 3.4 of the 2018-19 RFP and Section 2.3 of the 2018-19 RFA, to record and report attendance for each student served. Each program must have a formal sign-in/out process that records the arrival and dismissal time of each student individually. Each site must keep daily student attendance logs/records for all days of 21st CCLC operation. While not all programs are required to submit their student sign-in/sign-out sheets as a standard monthly deliverable to the Florida Department of Education, student sign-in/sign-out sheets must be made available to the department upon request. Also, projects who have Special Conditions applied to their approved awards due to Corrective Action Plans regarding student sign-in/out sheets, must provide the sheets to the department as a monthly deliverable.

Why is the sign-out process necessary?

For the safety of the student, the identity of the person picking up the student must be verified through signature at sign-out. Many afterschool programs enforce parental sign-out as afterschool programs serve a child care function in addition to academic enrichment and are required to have sign-in/out sheets. The sign-out process is also used in the verification of students being served for the duration of the program.

Are there any consistent items that must be on all sign-in sheets?

Yes. All student sign-in/out sheets must indicate that the sheet is for the 21st CCLC program. This can be done by placing the logo or the words "21st CCLC" at the top of the sheet, the name of the site. Each sheet should also include the date of the provision of services. Student's names or identifiers must be recorded on each sign-in/out sheet to indicate that the individual students attended the program. The student sign-in/out sheets must also include a space for the time in/out, a signature section for parental signature and student signature, and if applicable a program staff certification.

What are the methods available for tracking student sign-in/out attendance?

In practice, subrecipients have three general options for how they can document student attendance. Regardless of which method a programs decides to use, all program are required to document the following information in their student sign-in/out process: date, student's name or identifier, grade level, site, arrival time, departure time, clearly indicate which students are enrolled in the 21st CCLC program, and identify who signed a student in or out of the program.

Option 1- Paper Sign-In/Out sheets
For programs that opt to use a paper sign-in/out sheet, do students have to sign in and out?

- **Arriving to the program**
  - **Are students coming from a location in the school to an afterschool program housed in the same school?**
    - **Yes**. If students are coming from a location in the school to an afterschool program housed in the same school, the program can choose to either have the students sign-in themselves by providing their signature and the time they arrived, or the staff can certify the time when the student arrived at the program. At least one of the sign-in/out processes must require an authorized adult (parent/caregiver) or the student to sign the student in/out. Programs are **not** permitted to use staff certifications for <u>both</u> the sign-in and sign-out process.
    - **No.** If students are entering the program by either <u>walking or by bus</u> from their school to an off-site program, the program can choose to either allow their students to sign-in themselves and provide the time of arrival or the staff can certify the students time in. At least one of the sign-in/out processes must require an authorized adult (parent/caregiver) or the student to sign the student in/out. Programs are not permitted to use staff certifications for both the sign-in and sign-out process.
    - **No.** If an <u>authorized adult (parent/caregiver) is dropping off</u> a student to the program, the program can choose to either allow their parent to sign-in themselves and provide the time of arrival or the staff can certify the student's arrival time. At least one of the sign-in/out processes must require an authorized adult (parent/caregiver) or the student to sign the student in/out. Programs are not permitted to use staff certifications for both the sign-in and sign-out process.
- **Leaving the program**
  - **Are students leaving the program by walking?**
    - If the program allows students to walk home, the program must require the students to provide their signature next to their time of departure. The sign-out time can be written by either the student leaving the program or the program staff.
  - **Are students leaving the program by bus?**
    - If the program allows students to leave the program by bus, the program can choose to either have the program staff certify the student's sign-out time, or their students can sign-out and provide the time of departure. At least one of the sign-in/out processes must require an authorized adult (parent/caregiver) or the student to sign the student in/out. Programs are not permitted to use staff certifications for both the sign-in and sign-out process.
  - **Are students leaving the program with an authorized adult (parent/caregiver)?**
    - If students are leaving the program with an authorized adult (parent/caregiver), programs can choose to either allow their parent to sign-in themselves and provide the time of arrival or the staff can certify the students time in. At least one of the sign-in/out processes must require an authorized adult (parent/caregiver) to sign the student in/out. Programs are not permitted to use staff certifications for both the sign-in and sign-out process.
- **Staff Certifying**
  - If the program staff opts to certify the student's attendance, the staff must record their initials in the appropriate box indicating that the student has either entered or exited the program. On the same day, they must also certify the process by providing their legibly printed name, signature, and date on each student sign-in/out sheet for which they are certifying.

- **Option 2 - Electronic Sign-In**
  What is required if a 21st CCLC program opts to use an electronic sign-in/out process?

- Programs that elect to use an electronic sign-in/out process must use this process any time a student arrives to or departs from the 21st CCLC program. In the instance that the electronic sign-in/out system is not working properly, programs must utilize paper sign-in/out sheets until the system is operating properly.
- The electronic sign-in/out process must require each student to have either a unique pin, badge, passwords, or student identifier which is used by student or parent to sign-in/out of the program.
- The electronic system must record the actual times of students at the time of sign- in/out.
- Unique pin, badge, passwords or student identifiers must be secure and not shared.
- Procedures must be in place to prevent unauthorized use or transmission of information.
- The electronic sign-in/out process must have the capacity to accurately and dependably export the student attendance data into Excel.
- Access to the system and administrative rights must be limited to prevent possible internal control issues. For instance, program staff should not be able to delete records or make changes to the student attendance records which occurred days or weeks before. Use of the system must be limited to a few individuals and have a legitimate purpose for making these changes.
- Changes made to the attendance records by program staff must be recorded in the system. There will likely be some instances where staff will need to use their credentials to sign a student in or out of a program due to a student or the student's authorized adult (parent/caregiver) forgetting or losing their unique pin, badge, passwords, or student identifier; however, these changes should occur on the same day that the student was in attendance. The system of internal controls must be able to identify what changes were made and by which staff member.

- **Option 3 – Alternative method for tracking student attendance**
  There are programs with various needs that may require using a third option which employs an alternative method for handling their student sign-in/out process. In these rare instances, we urge programs to contact their respective 21st CCLC PDU and MCU Specialist for guidance. If a program elects to use an alternative method for tracking student attendance, they must put in place internal controls that meet or exceed the requirements established in option 1 and 2. All programs, regardless of which type of method a program uses must establish and maintain effective internal control over the federal award and provide reasonable assurances that the entity is managing the award in compliance with federal statutes, regulations, and terms of the award.

Schools do not make parents sign their students out unless they leave early. Why are you requiring more than the school?
The funding that comes from the 21st CCLC program is calculated per student, per day, and per hour of the services delivered. While other funding formulas may calculate student attendance, this program calculates funding based on contact hours. To verify that programs are serving students, not only for the days that students attend, but also for the hours that students attend, it is necessary to have a measure that indicates when students enter or leave the program. Also, as mentioned earlier, 21st CCLC programs serve a function of child care in addition to academic enrichment. In order to create a safe environment for students, it is necessary for program staff to be accountable for the whereabouts of students enrolled in the 21st CCLC programs. Sign-in/out sheets increase documentation of that accountability.

Can students sign-in early?
No. Programs are not permitted to sign students in early while school is still in session. The purpose of the 21st CCLC program is to expand learning opportunities for children outside of regular school hours. This may be considered supplanting funds as students should still be under the custody of the school during that time.

Alternately, while there may be some late pickups, sign-in and sign-out times should not dramatically deviate from the time that the 21st CCLC program is in operation.

Can students elect to only attend part of the 21st CCLC program? Can students participate in school sponsored clubs, sports, and other afterschool programs while signed in to the 21st CCLC program?
No. Students must be recruited and be provided continuous services designed to encourage full participation in all of the daily activities and long term engagement in the program. 21st CCLC programs are not drop-in programs. Students are expected to participate in 21st CCLC programs on a regular basis. Positive outcomes for students are strongly linked to a higher number of days of participation in a quality program. Programs must implement strategies to maximize the number of participation days for each student. Regularly participating students are those students that participate in the 21st CCLC program for 30 days or more.

Can students skip the 21st CCLC program on days in which they want to participate in school sponsored clubs, sports, and other afterschool programs?
Some 21st CCLC programs may have waiting list or rules which require them to drop a student if they have a given number of unexcused absences. If a program does allow their students to miss the 21st CCLC program for in-school sponsored events, the number of instances should be limited. On any given day a student cannot start or leave the 21st CCLC program to participate in school-related activities. With program approval, students could choose to use 21st CCLC on one day and a school-related activity on a different day; however, students are expected to participate in 21st CCLC programs on a regular basis. Positive outcomes for students are strongly linked to a higher number of days of participation in a quality program. Programs must implement strategies to maximize the number of participation days for each student. Regularly participating students are those students that participate in the 21st CCLC program for 30 days or more.

Does it matter which school the students attend?
Yes. Students enrolled in 21st CCLC programs must attend the target school(s) in the originally approved application, or eligible private schools located in the specific geographic area(s) served by program site(s).

What can and can't be pre-populated on my student sign-in/out attendance sheets?
All programs are encouraged to print the attendance sheets with the student's names or identifiers. If students are coming from a location in the school to an afterschool program housed in the same school, programs are permitted to prepopulate the students time of arrival. Programs are not permitted to pre-populate the arrival time of the student if the student is coming from a school to an off-site 21st CCLC program. Programs are never permitted to prepopulate the dismissal times, student and authorized adult (parent/caregiver) signatures, and staff certifications. Programs can pre-populate sheets to include student's names, grades, and indicate days off or holidays.

Are we permitted to photocopy student sign-in/out attendance sheets and change the dates?
No. Each site must keep daily student attendance logs/records for all days of 21st CCLC operation, which must accurately record the arrival and dismissal time of each student individually.

How long does my organization need to keep the student sign-in/out attendance sheets?
All subrecipients must maintain appropriate and sufficient documentation to show evidence of compliance with federal, state and local regulations. It is the responsibility of the subrecipient to retain all financial and program records in an auditable manner to be accessed and provided to the USED, FDOE, the Florida Department of Financial Services, the Florida Auditor General, or their designees at any time.

All accounts, records and other supporting documentation pertaining to all costs incurred shall be maintained for five (5) years from the last program activity, typically the submission of the final project disbursement report or longer if there is an ongoing investigation, monitoring or audit.

What is daily attendance reporting and when is it due?
Daily attendance reporting is required every month as part of a programs monthly deliverables and must accurately align with the submitted daily student sign-in/out sheets for daily attendance reporting.

Does my agency need to have someone that's responsible for collection and maintenance for attendance data and documentation?
Yes. All 21st CCLC programs must identify at least one staff member as the responsible party for the collection and maintenance for attendance data and documentation.

If a 21st CCLC program receives a decrease in funding due to low attendance, can this be reversed?
Programs that improve attendance may be eligible for an increase in funding up to the originally proposed level of service. Programs will have to request an amendment and provide documentation to support sustained attendance for a minimum of 90 days before requests may be considered by the 21st CCLC program office.

What is Average Daily Attendance?
Average Daily Attendance (ADA) is calculated by summing the daily attendance and dividing that sum by the number of program days in the period.

Can a program operate on certain days for boys and other days for girls?
No. Each student in the program must be afforded the full breadth of programming each week. A program cannot serve boys on Monday and girls on Tuesday, or offer football solely for boys and dancing solely for girls. Programs must seek to serve the same students on a daily basis. In addition, programs cannot serve some grade levels during the afterschool program and different grades in the before school or summer program.

Are there any additional requirements?
In addition to the requirements already addressed, please remember that subrecipients are obligated to comply with the requirements made in their original awarded application.

Disclaimer: Please note that this document is to assist subrecipients in becoming/remaining compliant with the 21st CCLC requirements. This document is an aid and is in no way meant to lessen the requirements imposed by applicable federal and state laws and regulations or the specific requirements in your original awarded application or applicable RFA/RFP. If you have any questions, please contact your assigned 21st CCLC Program Development Specialist.