

Office of Monitoring Frequently Asked Questions (FAQ)

The Office of Monitoring (OM) was created in 2019 to centralize grant monitoring functions into one office, and to ensure appropriate separation of duties so that grant and program management and monitoring activities are administered separately. OM’s new monitoring systems centralize compliance monitoring and simplify monitoring standards. Below are common questions asked by awardees during our first round of monitoring. If you have questions or concerns, please reach out to monitoring@cns.gov or the Monitoring Officer assigned to your grant.

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General Inquiries

Q: Does OM have a monitoring resource available for awardees to self-monitor?

A: Yes; the Overview of Uniform Monitoring Package Grantee Resource Guide is available on the [Americorps Monitoring](#) webpage. This resource provides an overview of the Uniform Monitoring Package OM uses to assess grant recipient compliance. Note that this resource is intended to be one of the many sources of information to assist awardees in demonstrating that its program is meeting compliance requirements. The resource guide is structured by the type of monitoring activity that may be assigned to a grant project and includes a crosswalk of the applicable Code of Federal Regulations, Terms and Conditions, and/or program standards. This guide cannot replace an awardee's responsibility to review and understand all regulations, requirements, and terms & conditions of the grant award. and terms & conditions of the grant award.

This resource will be updated, as needed. AmeriCorps has the right, at all reasonable times, to incorporate revisions to its monitoring tools and to include additional areas of assessment for compliance monitoring.

Q: What is the role/impact of an organization's financial compliance audit and Single Audit report on the AmeriCorps monitoring process?

A: An organization's financial audit and Single Audit reports play a critical role in many elements of the AmeriCorps grantmaking and oversight process. AmeriCorps uses this information as part of pre-award decision-making, to inform the grant portfolio risk assessment, and for Monitoring Officers to review during research and preparation for assigned monitoring activities.

Q: Is monitoring the same as PIIA (formerly IPERIA)?

A: No; the Payment Integrity Information Act (PIIA) of 2019, which was preceded by the Improper Payments Elimination and Recovery Improvement Act (IPERIA), is limited to specific cost transactions. As a federal agency, AmeriCorps has met certain federally determined thresholds that require AmeriCorps to conduct PIIA testing. PIIA testing is conducted by AmeriCorps' Office of the Chief Risk Officer (OCRO). OCRO shares PIIA activities and results with OM, as it helps inform awardee risk levels and the selection of grants OM may monitor.



Q: Is the Office of Monitoring the same as the Office of Inspector General (OIG)?

A: No, the Office of the Inspector General (OIG) is an independent office within AmeriCorps that provides oversight of the agency's programs and operations to protect the integrity of national service. OM independently monitors the AmeriCorps grant portfolio for compliance with federal regulations and program policy. If fraud, waste, or abuse is found during monitoring, OM will report this to the AmeriCorps OIG.

Q: How does OM coordinate with the AmeriCorps Audit and Debt Resolution team and how do your activities overlap?

A: The Office of Audit and Debt Resolution (OADR) manages the resolution and tracking of matters related to single audits and debt. OADR also leads the agency's indirect cost rate negotiation and policy efforts. These activities do not overlap with the main functions of OM. However, both units actively coordinate to ensure information related to awardee compliance and performance is available to monitoring officials. This information can inform the grant portfolio risk assessment.

Q: When making monitoring selections, does OM coordinate with other AmeriCorps departments to prevent simultaneous deadlines or oversight activities on awardees?

Before awardees are notified, OM shares the monitoring selections with leadership from the program offices, ORO, OCRO/the PIAA team, and OIG, allowing them to comment on the selections and share any information helpful in our scheduling. Awardees experiencing conflicting deadlines or multiple requests should contact their Monitoring Officer to discuss adjusting timelines.

Q: Why is there such a big focus on prohibited activities when audits and investigations often show other issues are more problematic?

A: Our framework for assessing grant compliance addresses both programmatic and financial elements of a grant and is based on Uniform Guidance and program regulations and policies. Prohibited activities pose a level of risk to AmeriCorps that warrants the assignment of specific monitoring activity. Risk is a function of both the likelihood of an adverse event occurring—i.e., a Member or volunteer performing a prohibited activity—and the consequences of the event should it occur.



Q: OM references a goal of collecting longitudinal data through its monitoring activities. What does longitudinal data include?

A: OM began its first cycle of monitoring in FY2020. As OM continues to collect more monitoring results over time, we can use this type of longitudinal data to evaluate our monitoring framework and to identify national and regional trends across grant programs. The results of individual awardee monitoring activities will support a broader, more complete evaluation of the best practices among AmeriCorps awardees and help provide future technical assistance and training initiatives.

Q: How is a program selected for monitoring?

A: Awardees are selected for monitoring based on a risk-informed framework. AmeriCorps has gathered data from past and current grant performance and matched it to risk indicators. OM uses this information to select which grants to monitor, and the type of monitoring activity we assign. Awardees with a higher risk score are not considered to be poor-performing or “bad awardees”; however, the greater the number of identified risks, the more likely an awardee will be selected for monitoring. In addition, OM does not limit its monitoring activities to high-risk awardees; we include lower risk recipients to assess the risk assessment methodology.

In addition, OM hopes to increase the frequency of monitoring for all awardees, which may be conducted remotely or on-site. AmeriCorps no longer uses the number of years since the last monitoring visit as a measure for determining monitoring selections (i.e., six years since last monitoring visit). On-site visits will not take place more than once per year for an awardee unless more frequent monitoring is implemented as part of corrective action planning.

Q: With the new monitoring process, awardees may be monitored more frequently than they have been in the past — how will AmeriCorps include enough time for awardees/commissions to incorporate corrective action/improvements before being selected for monitoring again?

A: Approved corrective actions should be implemented and completed within one year of the conclusion of the monitoring activity. If you are selected for monitoring and have a previously implemented or active corrective action plan, OM will use the monitoring opportunity to evaluate the impact of the improvements you adopted. It is not likely a grant recipient will be selected for a monitoring activity while a corrective action plan is active, or in progress unless complex compliance issues require more frequent, issue-based assessments.



Q: When you select a grant for monitoring, does it include all sub-recipients?

A: When a grant is selected for monitoring activities, OM will identify whether or not to assign a sub-recipient oversight monitoring activity. This monitoring activity focuses on the prime awardee's policies and practices for performing subrecipient oversight and monitoring. The activity includes an evaluation of subrecipient monitoring activities for a selected sample of sub-recipients for your grant. Documentation and interview requests from sub-recipients may be part of the monitoring activity, as these provide evidence to OM about how well the awardee is overseeing its sub-recipients. However, our office will not contact subrecipients directly without a prime awardee's knowledge. We will ask you to coordinate our activities related to subrecipients. Any subrecipient noncompliance will be reported to you for resolution.

Q: Will OM share common findings after each round of monitoring?

A: OM will provide high-level observations to awardees. However, OM must complete additional rounds of monitoring prior to identifying common trends and findings. The first monitoring rounds included a smaller body of awardees than we anticipate will be included in the future. Once additional monitoring rounds are completed, OM intends to examine longitudinal results from monitoring activities and share observations with awardees related to monitoring trends and common findings. The continued collection of monitoring data over time will support this goal of sharing results related to monitoring trends and common findings in the future.

Monitoring Activities

Q: Where can I find information on the different steps of the monitoring process?

The OM resource 'Remote Monitoring- at a Glance' on the [Americorps Monitoring](#) webpage outlines each step and the anticipated timelines for the remote monitoring process. OM has not yet conducted on-site monitoring visits due to the COVID-19 pandemic. However, details of the on-site monitoring process will be provided when they are finalized.

Q: What does the timeline between being notified of a request for monitoring and the conclusion of monitoring look like?

A: As OM continues to implement our new monitoring framework, timeframes for each phase of the monitoring activities are being evaluated. Our goal is that



awardees will be clearly informed of when to expect monitoring results. Ultimately, our goal is to complete monitoring activities within a 90-day period; however, the completion of additional monitoring cycles will inform us if this goal can be achieved. Refer to the resource 'Remote Monitoring- at a Glance' on the [Americorps Monitoring](#) webpage for anticipated timelines of individual steps in the remote monitoring process.

Q: How can awardees review and give feedback on OM's resources and processes?

A: The Overview of Uniform Monitoring Package Grantee Resource Guide is available on the [Americorps Monitoring](#) webpage. This resource provides an overview of the Uniform Monitoring Package OM uses to assess grant recipient compliance. OM encourages ongoing feedback on this resource and the monitoring experience, which can be sent to monitoring@cns.gov. Awardees undergoing monitoring activities have first-hand experience with the tools and process and will be asked by OM to provide feedback upon completion of their assigned monitoring activities. In addition, OM will review its policies, procedures, and tools related to monitoring on an annual basis.

Q: How will my organization be notified if we are selected for monitoring?

The Authorized Representative and Project Director on file in eGrants will receive a notification letter by email that your organization's grant has been selected for monitoring. (Note: for this reason, it is important to ensure grant contact information is correct in eGrants.) Your AmeriCorps Portfolio Manager is "cc'd" on this email. An initial notification letter describes your monitoring assignment, the assessment period, provides Office of Monitoring resources, and instructions on using the Secure Folder (secure, online document sharing platform). A second notification will also be emailed within one month with anticipated timelines of individual steps in the remote monitoring process. Awardees should contact the Monitoring Officer directly with any questions about the requested documents or next steps. Refer to the Remote Monitoring- at a Glance' resource on the [Americorps Monitoring](#) webpage.

Q: What if my organization cannot meet the deadlines listed for any stage of the monitoring process? Can I request an extension?

If you anticipate that you will not be able to meet any deadline set by the Office of Monitoring, notify the assigned Monitoring Officer as soon as possible to discuss the possibility of an extension.



Monitoring Results & Corrective Action Plans (CAP)

Q: How will my organization be notified of the monitoring results?

The Authorized Representative and Project Director on file in eGrants will receive an email with a notification letter that the assessment is complete, and the results are available. (Note: for this reason, it is important to ensure grant contact information is correct in eGrants.) Your AmeriCorps Portfolio Manager and Senior Portfolio Manager will be “cc’d” on this email. The notification letter summarizes the monitoring assignment and provides instructions to download your monitoring report (an Excel document) from your Secure Folder.

Q: What do the monitoring results consist of? Are these results final?

Results are communicated in the monitoring report, which is an Excel document downloaded from the Secure Folder. Each assessment question for the assigned monitoring activity(ies) is listed and includes a determination of Compliant, Not Compliant, or N/A. Items deemed Not Compliant will include additional notes of the finding from the Monitoring Officer. (Note for National Service Criminal History Check (NSCHC) records, findings are provided in a separate Excel document, the NSCHC Supplement Results.) Awardees are encouraged to contact the Monitoring Officer directly to discuss any findings.

The monitoring results are based on the Monitoring Officer’s review of submitted documents, and where applicable, information provided during interviews. Awardees may provide OM with additional information or documentation with their CAP responses to demonstrate compliance and resolve any findings.

Q: How are monitoring findings resolved?

Awardees are required to address each monitoring finding through a Corrective Action Plan (CAP), which is submitted in the Secure Folder. Awardees are encouraged to contact the Monitoring Officer directly to discuss any findings or for assistance before submitting their CAP response. OM expects all corrective action to be completed within one year of CAP approval. Refer to the Remote Monitoring- at a Glance’ resource on the [Americorps Monitoring](#) webpage for an overview of the CAP process and timelines. Additionally, [Awardee Guidance on Developing CAPs](#) is available on the [Americorps Monitoring](#) webpage.



Q: Will the Monitoring Officer and/or the awardee's Portfolio Manager (PM) oversee the implementation of the Corrective Action Plan (CAP)?

A: The Monitoring Officer assigned to the grant will oversee an awardee's development of the CAP and the awardee's progress toward implementing corrective measures. PMs are informed of plans for OM to monitor awardees, the monitoring results, and the approved CAP so that they are aware of the areas of improvement identified for awardees.

Q: My CAP is 'Approved In-Progress.' How do I update OM on the progress of my CAP?

Refer to your Notification of Corrective Action Plan Approval letter for full details. For any items deemed 'Approved – In Progress,' it is expected that your organization will provide OM with status updates and supporting documentation as corrective actions are completed. These status updates should be sent via email to the Monitoring Officer assigned to your grant and must be provided no later than 45 days after the identified completion date. Status updates should include a brief written description of any actions taken, along with documentation demonstrating completion. Any planned actions not completed and submitted to OM within one year of CAP approval may be subject to additional monitoring.

NSCHC

Q: If NSCHC monitoring results in enforcement action, when will this be communicated?

NSCHC findings may result in cost-based disallowance and additional enforcement action, such as required use the AmeriCorps-approved vendors and rechecks for applicable NSCHC records. If applicable, additional enforcement will be communicated upon approval of the Corrective Action Plan (CAP).

Q: Can I request the Office of Monitoring to review my NSCHC files and provide feedback?

OM will not review your NSCHC records to provide feedback or verify compliance outside of the formal monitoring process. Additional NSCHC resources are available at <https://americorps.gov/grantees-sponsors/history-check>. Specific questions about compliance with NSCHC regulations may be emailed to CHC@cns.gov.



Secure Folders

Q: I've seen reference to submitting documents in the Secure Folder. What is the Secure Folder and how do I access it?

The Secure Folder is an online platform the Office of Monitoring uses to facilitate monitoring activities, including managing documentation requests and submissions, requesting clarification, providing monitoring results, and, where applicable, assigning corrective action planning. Awardees selected for monitoring should refer to the [Secure Folder External User Guide](#) for guidance using Secure Folders. You may access the materials in Litmos through the [Americorps Monitoring](#) webpage.

An account is required to access your Secure Folder. When you are selected for monitoring, the Office of Monitoring will create an account for your organization using the Authorized Representative's email address listed in eGrants. Only one email address per organization can be given access to your Secure Folder. Awardees may change the account access to a different email at any time by contacting the assigned Monitoring Officer.

Interviews

Q: Which monitoring activities include interviews, and what do these interviews entail?

The following monitoring activities include interviews of members/volunteers, supervisors, or staff, as applicable: Prohibited Activities, Program-Specific Compliance, and Financial and Operational Fitness Assessments (FOFA). Awardees will be notified of the individuals selected for interviews and provided instructions for scheduling interviews. Additional information about monitoring interviews:

- Interviews are conducted by phone with the assigned Monitoring Officer.
- If any volunteers/members or supervisors selected for interviews decline the request, have since left work or service, or are otherwise unavailable, OM will select other names from the volunteer/member roster. We ask for your support in successfully coordinating and scheduling interview time slots.
- Prohibited Activities and Program-Specific Compliance interview questions focus on the typical experience that a member/volunteer, supervisor, or staff member has in their role.



- Prohibited Activities and Program-Specific Compliance interviews are intended to be one-on-one. OM generally does not permit supervisors or staff to be on the phone when interviewing volunteers or members about their service experience.
- If needed, multiple awardee staff may attend the FOFA interview to provide the necessary information.
- The [Overview of Uniform Monitoring Package Grantee Resource Guide](#) identifies assessment questions that are informed by interviews.

Risk Assessment

Q: Are there tools awardees can use for developing internal risk assessments?

A: OM will provide awardees with access to our monitoring tool templates and corrective action planning guides so that you may consider them in developing internal risk assessments. However, the criteria used in the AmeriCorps grant portfolio risk assessment module is specific to risk posed to our federal agency. The agency uses data collected from awardees, as well as information from publicly available sources to reach risk determinations. Awardees are responsible for assessing risks posed to their organizations to guarantee grant funding is used for its intended purposes. Risk assessment tools and criteria vary across organizations. You can refer to the [Uniform Guidance](#) to learn more about assessing risk.

Q: What is the “risk model” and how is it used to select awardees for monitoring?

A: All federal funders, including AmeriCorps, are required to monitor awardees. Limited resources require OM to direct monitoring resources to areas that pose specific risks to the agency. AmeriCorps uses a data-driven, internal risk assessment module which categorizes grants by a level of risk, and groups these risk and performance indicators into the following categories: financial, programmatic, organizational, and compliance.

This risk model informs OM of the type of issue-specific monitoring activities that should be assigned to grants. Monitoring activity assignments are not made randomly. The agency’s integration of risk rating criteria to monitoring assignments helps with internal assessment of the monitoring framework and identifies areas of improvement. In addition, OM does not limit its monitoring activities to high-risk awardees; we include lower risk recipients to assess the risk assessment methodology.



Monitoring selections contribute to AmeriCorps' efforts to identify strengths in practices among awardees and to identify compliance trends that may inform broader technical assistance and training strategies. While AmeriCorps does not release risk assessment scores per awardee, the specific monitoring activities assigned to awardees are based on the type of risk categories identified for the grant program.