

Office of Monitoring

Overview of Uniform Monitoring Package

Grantee Resource Guide

January 20, 2023

This resource provides AmeriCorps awardees with an overview of the Uniform Monitoring Package (UMP) used by AmeriCorps monitoring officials to assess grant recipient compliance with requirements from AmeriCorps program regulations, Uniform Guidance, policies, and terms and conditions.

Awardees selected for grant monitoring can use this resource to learn about the various areas of assessment for each monitoring activity and to prepare for remote or on-site monitoring activities. Additionally, awardees may use this resource to support self-assessments of compliance with applicable AmeriCorps projects.

Crosswalk of UMP with Federal Regulations and Compliance Requirements

This document demonstrates how applicable Code of Federal Regulations, Terms and Conditions, and/or program standards guide AmeriCorps compliance assessments. This crosswalk identifies the specific requirements from regulations (or other sources) used to monitor grant compliance.

IMPORTANT: This overview is intended to be one of the many sources of information to assist awardees in demonstrating its program is meeting compliance requirements. It cannot replace an awardee's responsibility to review and understand all regulations, requirements, 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.

Monitoring Activity Types:

This resource provides general guidance and details for each monitoring activity type. Monitoring activities are comprised of requests for documentation, interviews, and the review of document submissions that guide a monitoring official through the compliance assessment. One or more monitoring activity types may be assigned to a grant selected for monitoring. The Uniform Monitoring Package contains five monitoring activity types:

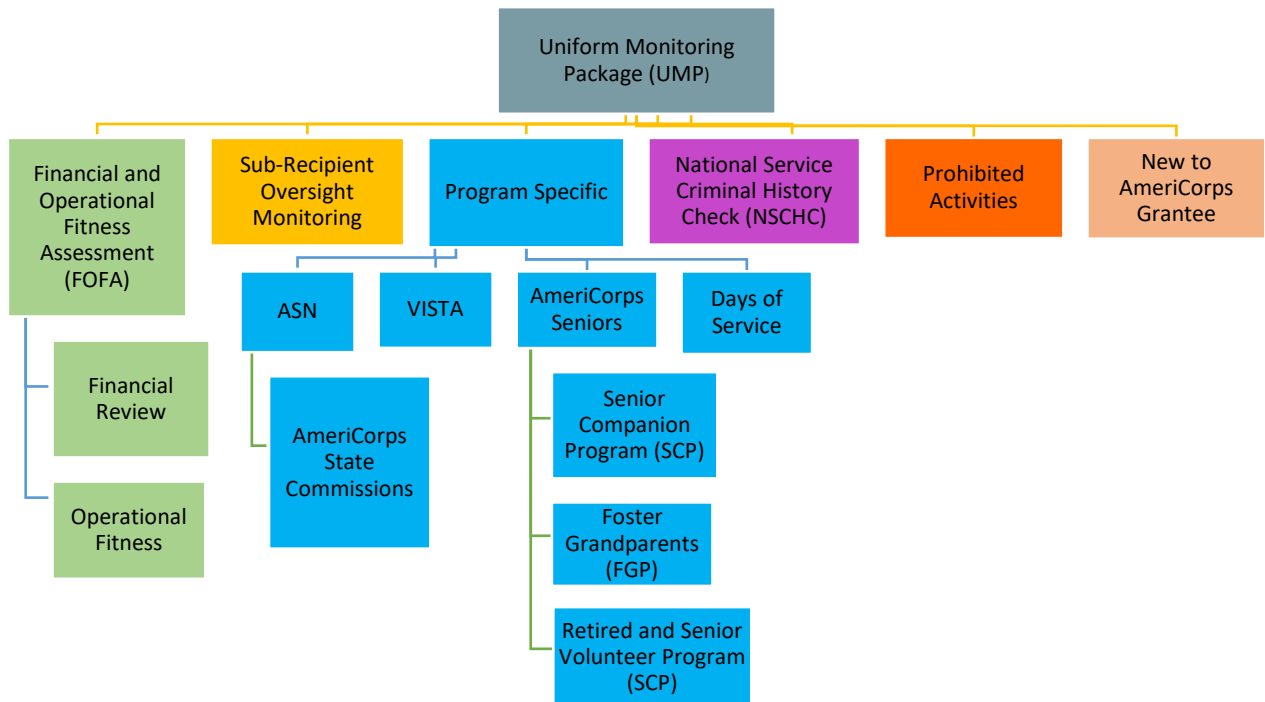


Figure 1: An image of the AmeriCorps Office of Monitoring Uniform Monitoring Package Activities.

Table of Contents

- Section 1 - Financial and Operational Fitness Assessment (FOFA)
- Section 2 - Subrecipient Oversight Monitoring Review
- Program Specific
 - Section 3 - AmeriCorps State and National (ASN)
 - Section 4 - AmeriCorps State Commissions
 - Section 5 - VISTA
 - Section 6 - Senior Companion Program (SCP)
 - Section 7 - Foster Grandparents (FGP)
 - Section 8 - Retired and Senior Volunteer Program (RSVP)
 - Section 12 - Days of Service
- Section 9 - National Service Criminal History Check (NSCHC)
- Section 10 - Prohibited Activities
- Section 11 - New to AmeriCorps Grantee

Monitoring Activity - Financial and Operational Fitness (FOFA)

Purpose and Approach	The Financial and Operational Fitness Assessment (FOFA) includes both the Financial and Operational review sections and involves document review in the areas of federal reporting, match/recipient share, direct cost allocation, indirect cost rate, cash management and a cost test. The Monitoring Officer will request documents for review to identify the program's fiscal capacity and management of federal funds to ensure compliance with the Code of Federal Regulations, as well as the review of internal controls, financial record retention, timekeeping, and procurement.
-----------------------------	---

Financial and Operational Fitness (FOFA)

01.01: REPORTING

01.01.01	Review the sponsor's/grantee's income statement or general ledger of grant expenses for the period in question. Does the amount reported in line e ("Federal share of expenditures") of the Federal Financial Report (FFR) for the review period reconcile with the sponsor's/grantee's financial records?
References:	2 CFR 200.328, 2 CFR 200.302
01.01.02	Review the sponsor's/grantee's chart of accounts. Can the sponsor/grantee segregate revenue and expenses by project or grant?
References:	2 CFR 200.328, 2 CFR 200.302

01.02: MATCH/RECIPIENT SHARE

01.02.01	Does the sponsor/grantee have a written policy that addresses how it treats match?
References:	2 CFR 200.306
01.02.02	If there is a written policy, does it include the following minimum elements? <ul style="list-style-type: none"> • address how match is tracked and reported, • specify that it comes from a non-federal source (or, if it is from another federal source, it follows AmeriCorps guidance and is approved by the funding agency), • shows how in-kind donations are valued and recorded at fair market value.
References:	2 CFR 200.306
01.02.03	Review the sponsor's/grantee's income statement, general ledger, or other tracking sheet of match expenses for the period in question. Does the amount reported in line J ("Recipient share of expenses") of the Federal Financial Report (FFR) for the review period reconcile with the sponsor's/grantee's financial records?
References:	2 CFR 200.306

01.03: DIRECT COST ALLOCATION METHODOLOGY

01.03.01	Does the sponsor/grantee have a written methodology that adequately describes how direct costs are allocated on a reasonable basis? If NO, note how costs are allocated below.
References:	2 CFR 200.405, 2 CFR 200.413
01.03.02	If there is a plan, does it meet the following criteria? <ul style="list-style-type: none"> • The plan is current. • The plan has a method that is reasonable and not based on budgeted percentages.
References:	4 CFR 200.405, 2 CFR 200.413

01.04: INDIRECT COST RATE

01.04.01	Does the approved budget include indirect costs?
References:	2 CFR 200.413, 2 CFR 200.414, 2 CFR 200.416, 2 CFR 200.418
01.04.02	If YES to question 01.04.01, review the approved negotiated rate or cost allocation plan (state and local governments can use a cost allocation plan). Is the rate unexpired, according to the expiration date on the agreement?

References:	2 CFR 200.413, 2 CFR 200.414, 2 CFR 200.416, 2CFR 200.418
01.04.03	Review the sponsor/grantee's cost allocation plan, financial policies, and/or provided list of costs included as indirect costs and note which costs they consider indirect. Review the approved budget to ensure these costs are not included as direct cost line items. Costs cannot be simultaneously charged directly to the grant and included in the indirect cost rate. Are all indirect costs budgeted appropriately as part of the indirect cost rate? If NO, note the type of expense and the amount charged incorrectly for the period.
References:	2 CFR 200.413, 2 CFR 200.414, 2 CFR 200.416, 2CFR 200.418
01.05: CASH MANAGEMENT	
01.05.01	Does the sponsor/grantee have a policy and procedure to manage Federal cash drawdowns?
References:	2 CFR 200.305
01.05.02	If there is a policy and procedure to manage cash drawdowns, do they include the following minimum elements?
	• Cash is drawn on a reimbursement or 'as-needed' basis, and not drawn in advance of need
	• The Non-Federal entity minimizes the time between drawing down and dispersal of cash
	• Procedural steps that outline the approval and drawdown process, including who is responsible for each action
References:	2 CFR 200.305
01.05.03	Does the grantee follow the policy or procedures established in their Federal Cash Management policy? Review the supporting documentation for the requested Payment Management System drawdown(s) to ensure that the calculations and process used are in alignment with the grantee's written policies. If NO, describe the deficient portions in the Notes section below.
References:	2 CFR 200.305
01.05.04	When viewing the Payment Management System summary of payments for this grant and the associated supporting documentation for selected drawdown samples, do drawdowns appear to be made in an allowable manner? Drawdowns should be based on actual expenditures on an as-needed basis.
References:	2 CFR 200.305
01.06: Cost Testing	
01.06.01	Are the sampled costs free of issues/errors? If NO, document issues in the Member Expense Testing Workbook (optional) and summarize them in the Notes section below (required).
References:	2 CFR 200.303, 2 CFR 200.420 – 476 General Provisions for Selected Items of Cost
01.07: Internal Controls	
01.07.01	Review the Segregation of Duties Worksheet filled out by the sponsor/grantee and complete the required interviews with prime staff. Does there appear to be adequate segregation of duties amongst staff for key financial functions?
References:	2 CFR 200.303
01.07.02	Does the sponsor's/grantee's written financial policies explicitly state the internal controls in place, consistent with the worksheet's results and with the required staff interviews?
References:	2 CFR 200.303
01.08: Record Retention	
01.08.01	Does the sponsor/grantee have a written policy for retention of financial records and supporting documentation for three years from the date of the submission of the final FFR, or when any final action is taken to resolve any claim, audit, or investigation involving the grant?
References:	2 CFR 200.334
01.09: Time Keeping	

01.09.01	<p>Is the grantee compliant with the Standards for Documentation of Personnel Expenses (e.g. Timekeeping)?</p> <p>Consider the sponsor's/grantee's policies around documentation of personnel expenses, sample timesheets, and information provided during the FOFA interview. Does the provided information reflect the necessary components for documentation of personnel expenses as outlined below?</p> <ul style="list-style-type: none"> • Charges to the grant for salaries and wages are based on records (e.g. timesheets) that accurately reflect the work performed. These records must: <ul style="list-style-type: none"> o Be supported by a system of internal control that provides reasonable assurance that charges are accurate, allowable, and properly allocated. o Incorporated into the official records of the organization o Reasonably reflects the total activity for which employee is compensated o Comply with the grantee's accounting policies and practices • For an employee who is billed less than 100% to the grant, salary or wages are allocated to specific activities or cost objectives
References:	2 CFR 200.430, 2 CFR 200.430(i), 2 CFR 200.431, 2 CFR 200.413(c), 2 CFR 200.416
01.10: Procurement	
01.10.01	Does the sponsor/grantee have a procurement policy?
References:	2 CFR 200.317-327
01.10.02	<p>If there is a policy, does it include the following minimum elements?</p> <ul style="list-style-type: none"> • Standards of conduct that cover at minimum conflicts of interest and disciplinary actions to be applied for violations of such standards • Delineation of purchase thresholds, • Single source provisions, and • Necessary affirmative steps to assure minority businesses, women's business enterprises, and labor surplus area firms are used when possible
References:	2 CFR 200.317-327

Subrecipient Oversight and Monitoring	
Subrecipient Monitoring	
Purpose and Approach	The Subrecipient review involves document review in the areas of Subrecipient Agreement, Risk Agreement, Monitoring, and Reporting. The Monitoring Officer will request documents for review to identify the program's oversight of the subrecipient's implementation of policies and agreements to ensure compliance with the Code of Federal Regulations and Americorps Terms and Conditions.
02.01: SUBRECIPIENT AGREEMENT	
02.01.01	Does the grantee have current, completed subrecipient agreements on file for the requested subrecipients?
02.01.02	Does the agreement: <ul style="list-style-type: none"> • Ensure that every subaward is clearly identified as a subaward? • Include the following information (updated as necessary)?: <ul style="list-style-type: none"> o Federal award identification. o Subrecipient name (which must match the name associated with its unique entity identifier); o Federal Award Date of award to the recipient by the Federal agency; o Subaward Period of Performance Start and End Date; o Subaward Budget Period Start and End Date; o Total Amount of Federal Funds Obligated and committed to the subrecipient by the pass-through entity including the current financial obligation; o Federal award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA); o Name of Federal awarding agency, pass-through entity, and contact information for awarding official of the Pass-through entity; o Indirect cost rate for the Federal award (including if the de minimis rate is charged) per § 200.414. • Describe requirements imposed by the pass-through entity on the subrecipient so that the award is used in accordance with Federal statutes, regulations and the T&C's of the Federal award; • Describe any additional requirements that the pass-through entity imposes on the subrecipient; • Include an approved federally recognized indirect cost rate negotiated between the subrecipient and the Federal Government. If no approved rate exists, the pass-through entity must determine the appropriate rate in collaboration with the subrecipient • Include a requirement that the subrecipient permit the pass-through entity and auditors to have access to the subrecipient's records and financial statements as necessary for the pass-through entity to meet the requirements of this part; and • Describe appropriate terms and conditions concerning closeout of the subaward
02.02: GENERAL REQUIREMENTS	
02.02.01	Does the grantee consider imposing specific subaward conditions when appropriate. <ul style="list-style-type: none"> • Does the grantee have guidelines, or a policy or procedure to govern when they will impose specific conditions? • If the grantee demonstrates evidence of having imposed specific conditions on a subawardee, does the grantee follow their policy/procedure on specific conditions on subawards?
02.03: RISK ASSESSMENT	
02.03.01	Does the grantee assess each subrecipient's risk of noncompliance for the purpose of determining the appropriate subrecipient monitoring? <ul style="list-style-type: none"> • Does the grantee have a risk assessment or policy/procedure for assessing risk? • Does the policy address how the results of the risk assessment are used to tailor subrecipient monitoring activities to varying risk levels? • Is the grantee implementing the risk assessment in accordance with its own policy/procedure?
02.04: MONITORING	
02.04.01	Does the grantee have a policy or procedure on how they will monitor their subrecipients to ensure compliance with AmeriCorps and grant regulations?
02.04.02	Does the policy describe: <ul style="list-style-type: none"> • The reports, both financial and programmatic, that will be collected and reviewed by the grantee; • How the grantee will follow-up and ensure that any findings or issues uncovered during an audit, site visit, or by other means are resolved; and

	<ul style="list-style-type: none"> • How management decision are issued for audit findings pertaining to the Federal award provided to the subrecipient from the pass-through entity.
02.04.03	Does the grantee follow the policy or procedures established in their subrecipient monitoring policy?
02.04.04	Does the grantee maintain a policy that outlines possible enforcement actions for instances of noncompliance?
	<ul style="list-style-type: none"> • Does the grantee have guidelines, or a policy or procedure to govern when they will take enforcement actions?
	<ul style="list-style-type: none"> • If the grantee demonstrates evidence of having taken enforcement actions against a subawardee, does the grantee follow their policy/procedure on enforcement action on subawards?
02.05: AUDIT AND REPORTING	
02.05.01	Does the grantee verify that every subrecipient is audited when required?
02.05.02	Does the grantee adjust its own records based on the results of the subrecipient's audits, on-site reviews, or other monitoring, when needed?
02.05.03	Is there evidence that the grantee follows up on sub-recipient Single Audit findings that relate to their federal sub-award?
02.06: SUBAWARD REPORTING	
02.06.01	Does the recipient make individual subawards in amounts greater or equal to \$30,000?
02.06.02	If subawards are made in amounts greater or equal to \$30,000, is each subaward reported through http://www.fsrs.gov ?

Monitoring Activity - ASN Programmatic

Purpose and Approach	The AmeriCorps State and National (ASN) review assesses the soundness of grantee policies, procedures and adherence to the Code of Federal Regulations and other assurances, certifications, prohibitions, and regulatory requirements. The Monitoring Officer will request documents and conduct interviews to identify the program's compliance regarding member management, financial management and the agreed upon Terms and Conditions for this grant type.
-----------------------------	---

Program-Specific (ASN)

03.01: ASN MEMBER MANAGEMENT - ASN Programmatic

03.01.01	Is there evidence that Member eligibility documentation was reviewed and found satisfactory prior to enrollment?
	• Proof of citizenship or allowable legal status;
	• Proof of age;
	• Member certification of GED or HS diploma or statement that Member agrees to earn one prior to using the Education Award.
03.01.02	Is there evidence the grantee grant-funded activities are compliant with Non-Supplantation, Non-Duplication and Non-Displacement restrictions?
	• Non-supplantation
	• Non-duplication
03.01.03	Member fundraising time is limited to 10% of the maximum allowable number of service hours, and member training is limited to 20% or less of the total aggregate agreed-upon member service hours in the program.
	Does the program have a process for ensuring member hours are tracked and fundraising time does not exceed the 10% limit?
	Does the program have a process for ensuring member hours are tracked and member education and training do not exceed the 20% limit?
03.01.04	Are all activities included in the Member Position Description compliant?
03.01.05	Do the service activities of the member align with the position description?
03.01.06	Is there a designated supervisor providing regular and consistent support and supervision for each Member?
03.01.07	Have supervisors completed member management training to effectively manage AmeriCorps Members?
03.01.08	Does the grantee recognize AmeriCorps support?
	• Are projects visually identified as AmeriCorps (including, but not limited to logos, websites, social media, service gear and clothing) and following AmeriCorps brand guidelines?
	• Are members provided information that projects are part of AmeriCorps?
	• Are there alterations to AmeriCorps logos or other brand identities? If yes, did the grantee receive prior written approval from AmeriCorps?
03.01.09	• If applicable, do agreements with subsites explicitly state the program is an AmeriCorps program?
	Does the progress report raw/source Documentation provided demonstrate accuracy and validity of performance measure progress reported?

03.02: ASN Program Financial Review

03.02.01	If the grant is a fixed price award, (Professional Corps, Full-time, or EAP) does the grantee have a policy to manage the calculation and drawdown of fixed price awards?
03.02.02	If there is a policy, does it include the following elements in line with the 2018 Fixed Price Financial Process Guide provided by AmeriCorps?
	• Advances of fixed amount grant funds are not permitted outside of express written approval from AmeriCorps
	• Show drawdowns are determined for the type of fixed amount award in use:
	o For Professional Corps and Full-time awards: Earned funds are based on the hours served by enrolled members
	o For EAP awards: Earned funds are based on the number of members enrolled, adjusted by slot type.

03.03: Verification of Terms and Conditions

03.03.01	<p>Is there documentation to show that the recipient maintains a procedure for the filing and adjudication of grievances in alignment with 45 CFR § 1225?</p> <ul style="list-style-type: none"> • Time frames for filing and response • Person who receives and responds to the complaints both informal (grantee personnel) and formal (EEOP Director of AmeriCorps or AmeriCorps designee) • Documentation required • Legal representation is allowed • Freedom from retaliation/reprisal • The process involved from initial filing, review, decisions made, corrective action, through close out
03.03.02	<p>Does the grantee/sponsor organization have a non-discrimination policy that includes all of the federally required protected classes as listed below?</p> <ul style="list-style-type: none"> • Race • Color • National origin • Gender/gender identity or expression • Age • Religion • Sexual orientation • Disability • Political affiliation • Marital or parental status • Genetic information • Military service
03.03.03	<p>Based on information available to AmeriCorps, in the last two years, did the grantee document grievances and/or discrimination complaints and the corresponding follow up/response in compliance with applicable federal statutes as embodied in the program regulations?</p> <ul style="list-style-type: none"> • Was the grievance/discrimination complaint or non-compliance substantiated? • Was relief or remedial action taken? (Please describe.)
03.03.04	<p>Does the grantee/sponsor have a policy and procedure in place regarding the provision of reasonable accommodation for members and staff to ensure accessibility as per the federal requirements?</p>
03.03.05	<p>Does the sponsor/grantee have a policy and procedure in place for ensuring accessibility to persons with Limited English Proficiency?</p>
03.03.06	<p>Does the grantee notify members, community beneficiaries, applicants, program staff, and the public, including those with impaired vision or hearing, that it operates in accordance with federal and program requirements on non-discrimination?</p> <ul style="list-style-type: none"> a. Does the policy summarize the requirements, note the availability of compliance history information, and explain the procedures for filing discrimination complaints with AmeriCorps? b. Does the policy include information on civil rights requirements, complaint procedures and the rights of beneficiaries in member/volunteer service agreements, handbooks, manuals, pamphlets, and posted in prominent locations, as appropriate? c. Does the sponsor/grantee notify the public in recruitment material and application forms that it operates its program or activity subject to nondiscrimination requirements?

Monitoring Activity - ASN Commission Programmatic

Purpose and Approach	The AmeriCorps State Commissions review assesses the soundness of grantee policies, procedures and adherence to the Code of Federal Regulations and other assurances, certifications, prohibitions, and regulatory requirement The Monitoring Officer will request documents to identify the program's compliance regarding organizational management.
-----------------------------	--

ASN Commission

04.01: Organizational Management- ASN Commissions

04.01.01	Does the commission have a three-year, comprehensive national and community service plan and establishment of state priorities that is consistent with AmeriCorps' broad goals of meeting human, educational, environmental, and public safety needs?
-----------------	---

References:	45 CFR § 2550.80
--------------------	------------------

04.01.02	Does the comprehensive national and community service plan and establishment of state priorities that is consistent with AmeriCorps' broad goals of meeting human, educational, environmental, and public safety needs comply with the requirements below?
-----------------	--

- Be annually updated.
- Be developed through an open and public process that provides for the maximum participation and input from a broad cross-section of individuals and organizations, including national service programs within the state.
- Ensure outreach to diverse, broad-minded community service organizations that serve underrepresented populations by creating State networks and registries or by utilizing existing ones.
- The plan must set forth the State's goals, priorities, and strategies for promoting national and community service and strengthening its service infrastructure, including how AmeriCorps-funded programs fit into the plan.
- May contain such other information as the State commission considers appropriate and must contain other information as AmeriCorps may require.
- Must ensure outreach to and coordination with municipalities and county governments regarding the national service laws
- Must provide for effective coordination of funding applications submitted by the state and other organizations within the State under national service laws
- Include measurable goals and outcomes for national service programs funded through the State and other organizations within the State under the national service laws.
- Be subject to approval by the chief executive officer of the State.

References:	45 CFR § 2550.80 (a)
--------------------	----------------------

04.01.03	Does the commission have a Supplemental State Service Plan for adults age 55 or older?
-----------------	--

References:	45 CFR 2550.80(m)
--------------------	-------------------

04.01.04	Does the Supplemental State Service Plan for adults age 55 or older include the requirements below?
-----------------	---

- Recommendations for policies to increase service for adults age 55 or older, including how to use such adults as sources of social capital, and how to utilize their skills and experience to address community needs.
- Recommendations to the State agency on aging (as defined in section 102 of the Older Americans Act of 1965, 42 U.S.C. 3002) on a marketing outreach plan to businesses and outreach to non-profit organizations, the State education agency, institutions of higher education, and other State agencies.
- Recommendations for civic engagement and multigenerational activities, including early childhood education and care, family literacy, and other after school programs, respite services for adults age 55 or older and caregivers, and transitions for older adults age 55 or older to purposeful work in their post-career lives.
- Incorporate the current knowledge base regarding the economic impact of the roles of workers age 55 or older in the economy.
- Incorporate the current knowledge base regarding the social impact of the roles of such workers in the community.
- Incorporate the current knowledge base regarding the health and social benefits of active engagement for adults age 55 or older.
- Be made available to the public

References:	45 CFR 2550.80(m)
--------------------	-------------------

04.01.05	Does the state comply with the federal requirements regarding the composition of State Commissions? [45 CFR 2550.50(a-e), 45 CFR 2550.60]
-----------------	---

- State's Chief Executive Officer appoints member of commission (unless waived in writing by AmeriCorps)
 - 15-25 voting members (excluding ex officio members) (unless waived in writing by AmeriCorps)
 - Members appointed to renewable three-year terms
- To the extent practicable, the chief executive officer of a State shall ensure that the membership for the State commission is diverse with respect To race, ethnicity, age, gender, and Disability characteristics.

	<ul style="list-style-type: none"> • Not more than 50% plus one of the members of a State Commission may be from the same political party (unless waived in writing by AmeriCorps)
	<ul style="list-style-type: none"> • The number of voting members of a State Commission who are officers or employees of the state may not exceed 25% of the total membership of that State Commission.
	<ul style="list-style-type: none"> • AmeriCorps representative serves on the commission as an ex officio member
	*Categories of voting members - one member may fill more than one role:
	<ul style="list-style-type: none"> • A community-based agency or organization in the State
	<ul style="list-style-type: none"> • The head of the state education agency or his or her designee
	<ul style="list-style-type: none"> • A representative of local government in the state
	<ul style="list-style-type: none"> • A representative of local labor organizations in the state
	<ul style="list-style-type: none"> • A representative of business
	<ul style="list-style-type: none"> • An individual between the ages of 16 and 25, inclusive, who is a participant or supervisor of a service program for school age youth or of a campus-based or national service program
	<ul style="list-style-type: none"> • A representative of a national service program
	<ul style="list-style-type: none"> • An individual with experience in the educational, training, and development needs of youth, particularly disadvantaged youth
	<ul style="list-style-type: none"> • An individual with experience in promoting the involvement of older adults (age 55 and older) in service and volunteerism
	<ul style="list-style-type: none"> • A representative of the volunteer sector
References:	45 CFR 2550.50(a-e), 45 CFR 2550.60
04.01.06	<p>The State commission is responsible for the selection of subtitle C programs and preparation of applications to AmeriCorps. Does the commission complete all of the following:</p> <ul style="list-style-type: none"> •Preparing an application to AmeriCorps to receive funding or education awards for national service programs selected by the State. •Administering a competitive process to select national service programs for funding. •Administering the grants and overseeing and monitoring the performance and progress of funded programs. •Implementing comprehensive, non-duplicative evaluation and monitoring systems. •Providing technical assistance to local nonprofit organizations and other entities in planning programs, applying for funds, and in implementing and operating high quality program. •Developing mechanisms for recruitment and placement of people interested in participating in national service programs.
References:	45 CFR 2550.80
04.01.07	<p>Does the commission use all of the following criteria when selecting formula programs?</p> <ul style="list-style-type: none"> • The quality of national service program proposed to be carried out directly by the applicant or supported by a grant from the applicant. • The innovative aspect of the national service program, and the feasibility of replicating the program. • The sustainability of the national service program. • The quality of the leadership of the national service program, the past performance of the program, and the extent to which the program builds on existing programs. • The extent to which participants of the national service program are recruited from among residents of the communities in which projects are to be conducted, and the extent to which participants and community residents are involved in the design, leadership, and operation of the program. • The extent to which projects would be conducted in one of the areas listed in 45 CFR 2522.450 (c)(1) through (5). • Such other criteria as AmeriCorps considers to be appropriate, following appropriate notice.
References:	45 CFR § 2522.475

Monitoring Activity - VISTA Programmatic

Purpose and Approach	This review is conducted to determine the functionality and compliance of a VISTA program based on the Code of Federal Regulations and the agreed upon Terms and Conditions for this grant type. The Monitoring Officer will request documents that establish the policies and procedures regarding organizational and member management.
Program-Specific (VISTA)	
05.01: VISTA MEMBER MANAGEMENT - VISTA Programmatic	
05.01.01	Is there evidence that VISTAs, Summer Associates, or Leaders are serving full-time as defined by the host site?
References:	DVSA Sec. 104, 42 U.S.C. §4954 (a), 45 CFR 2556.205, VISTA Member Handbook Chapter 1
05.01.02	Is there documentation to show that the sponsor is documenting member leave, and is leave in allowable amounts?
References:	Memorandum of Agreement, DVSA Sec. 105 (b), 42 U.S.C. § 4955 (b), VISTA Member Handbook Chapter 9
05.01.03	Does the organization have a policy for VISTA member leave? If so, is the policy compliant with VISTA requirements?
References:	Memorandum of Agreement, DVSA Sec. 105 (b), 42 U.S.C. § 4955 (b), VISTA Member Handbook Chapter 9
05.01.04	Is there a designated supervisor for each VISTA member, Leader, or Summer Associate?
References:	VISTA Sponsor Handbook - Supporting and Supervising Members; VISTA Member Handbook Chapter 3; Memorandum of Agreement
05.01.05	Has the VISTA Project Director completed the VISTA Sponsor Orientation and have site supervisors been adequately trained to manage members by the sponsor?
References:	Memorandum of Agreement
05.01.06	Are all activities in the VISTA Assignment Description (VAD) compliant?
References:	Memorandum of Agreement; VISTA Member Handbook Chapter 1; VISTA Sponsor Handbook - Preparing for New Members
05.01.07	Do the performed service activities of the member align with the VISTA Assignment Description (VAD)?
References:	Memorandum of Agreement; VISTA Member Handbook Chapter 1;
05.01.08	Is the designated supervisor providing regular and consistent support for each member?
References:	Memorandum of Agreement; 45 CFR § 2556.310; VISTA Member Handbook Chapters 2 and 3; VISTA Sponsor Handbook - Supporting and Supervising Members
05.01.10	Are members provided work space and any other materials necessary to operate and complete members' assignments?
References:	Memorandum of Agreement; 45 CFR 2556.115(b); VISTA Sponsor Handbook - Supporting and Supervising Members; VISTA Member Handbook Chapter 14
05.01.11	If applicable, are members reimbursed for service-related transportation or provided other means of transport?
References:	45 CFR 2556.115(b); Memorandum of Agreement; VISTA Sponsor Handbook - Supporting and Supervising Members; VISTA Member Handbook Chapter 7
05.01.12	If applicable, are optional benefits given to the members appropriate?
References:	Memorandum of Agreement; 45 CFR 2556.205; 45 CFR 2556.320; 45 CFR 2556.505; VISTA Sponsor Handbook - Supporting and Supervising Members; VISTA Member Handbook Chapters 5 and 11
05.01.13	Is there evidence that members: <ul style="list-style-type: none"> • perform activities that would otherwise be performed by employed workers or volunteers? • supplant the hiring of or result in the displacement of employed workers or other volunteers? • engage in activities that impair existing contracts for service?
References:	45 CFR 2556.150

05.01.14	Does the sponsor offer a site orientation and training at the beginning of each members' service, as well as other training opportunities throughout their service year?
References:	Memorandum of Agreement; VISTA Sponsor Handbook - Supporting and Supervising Members; VISTA Member Handbook Chapter 4
05.01.15	If applicable, do members' outside employment meet requirements and is it documented?
	• Are outside employment forms approved and on file?
	• Is members' outside employment part-time?
	• Is members' outside employment hours not in conflict with VISTA service hours?
	• Members' outside employers are not the sponsor, sub-site, contractor for the sponsor, or other project-related organization?
References:	VISTA Member Terms and Conditions; VISTA Sponsor Handbook - Supporting and Supervising Members; VISTA Member Handbook Chapter 14
05.01.16	If applicable, are teleservice forms complete and approved by the supervisor?
References:	VISTA Member Terms and Conditions; VISTA Sponsor Handbook - Supporting and Supervising Members; VISTA Member Handbook Chapter 14
05.01.17	Does the sponsor recognize AmeriCorps support?
	• Are projects visually identified as AmeriCorps (including, but not limited to logos, websites, social media, service gear and clothing) and following AmeriCorps brand guidelines?
	• Are members provided information that projects are part of AmeriCorps?
	• Are there alterations to AmeriCorps logos or other brand identities? If yes, did the grantee receive prior written approval from AmeriCorps?
	• If applicable, do agreements with subsites explicitly state that the program is an AmeriCorps program?
References:	General Terms and Conditions
05.01.18	Does the progress report raw/source documentation provided demonstrate accuracy and validity of performance measure progress reported?
References:	Post Federal Award Requirements: Performance Measurement; FY22 General Terms and Conditions B. Other Applicable Terms and Conditions
05.02: SUB-SITE OVERSIGHT [Multi-site Projects Only]	
05.02.01	Has the sponsor provided information to current subsites on the conditions of VISTA service?
References:	Memorandum of Agreement
05.02.02	Has the sponsor entered into a subsite agreement with each subsite?
References:	Memorandum of Agreement
05.02.03	Does each subsite agreement or Memorandum of Understanding (MOU) contain at least the following elements?
	• Written understanding and agreement that the Site is required to properly ensure that all VISTA resources are used to carry out the VISTA project in conformity with all applicable AmeriCorps laws, regulations, policies, procedures, program guidance and the MA Provisions
	• Responsibilities of the parties and other program requirements
	• Policies and procedures regarding requesting removal of members
	• Records to be kept and reports on project and member progress to be submitted
	• Written understanding and agreement that while the Sponsor maintains responsibility for the Site's proper use of members, the Site may be held financially responsible to AmeriCorps for the inappropriate use of all such VISTA resources by the Site.
	• If applicable site support payments.
References:	Memorandum of Agreement; 45 CFR § 2556.155
05.02.04	Are all subsites eligible to receive VISTA members?
References:	VISTA Member Handbook Chapter 1, DVSA, SEC. 103 (a) (42 U.S.C. 4953(a)), Memorandum of Agreement, 45 CFR 2556.100, 45 CFR 2556.105
05.02.05	Does the sponsor require or accept application fees from potential subsites or require subsites to contribute financially to the project beyond Site Support Payment, cost share, or reimbursement (which includes reasonable and actual costs incurred for project administration provided by the sponsor).
References:	Memorandum of Agreement; 45 CFR 2556.155
05.02.06	Does the sponsor monitor subsites to ensure compliance with grant requirements?

References:	Memorandum of Agreement; General Terms and Conditions; 2 CFR 200.303(c); 2 CFR 200.329(a)
05.03: Verification of Terms and Conditions	
05.03.01	<p>Is there documentation to show that the recipient maintains a procedure for the filing and adjudication of grievances in alignment with 45 CFR § 1225?</p> <ul style="list-style-type: none"> • Time frames for filing and response • Person who receives and responds to the complaints both informal (grantee personnel) and formal (EEO Director of AmeriCorps or AmeriCorps designee) • Documentation required • Legal representation is allowed • Freedom from retaliation/reprisal • The process involved from initial filing, review, decisions made, corrective action, through close out
References:	45 CFR 1225
05.03.02	<p>Does the grantee/sponsor organization have a non-discrimination policy that includes all of the federally required protected classes as listed below?</p> <ul style="list-style-type: none"> • Race • Color • National origin • Gender/gender identity or expression • Age • Religion • Sexual orientation • Disability • Political affiliation • Marital or parental status • Genetic information • Military service
References:	AmeriCorps Annual General Terms and Conditions
05.03.03	<p>Based on information available to AmeriCorps, in the last two years, did the grantee document grievances and/or discrimination complaints and the corresponding follow up/response in compliance with applicable federal statutes as embodied in the program regulations?</p> <ul style="list-style-type: none"> • Was the grievance/discrimination complaint or non-compliance substantiated? • Was relief or remedial action taken? (Please describe.)
References:	45 CFR 1225, AmeriCorps Annual General Terms and Conditions, 45 CFR 2556
05.03.04	Does the grantee/sponsor have a policy and procedure in place regarding the provision of reasonable accommodation to ensure accessibility as per the federal requirements?
References:	45 CFR 1203/1214/1232, Rehabilitation Act of 1973: Sections 504, 508
05.03.05	Does the sponsor/grantee have a policy and procedure in place for ensuring accessibility to persons with Limited English Proficiency?
References:	AmeriCorps Annual General Terms and Conditions, Executive Order 13166, 67 FR 64604, Title VI, Civil Rights Act 1964: Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons
05.03.06	<p>Does the grantee notify members, community beneficiaries, applicants, program staff, and the public, including those with impaired vision or hearing, that it operates in accordance with federal and program requirements on non-discrimination?</p> <p>a. Does the policy summarize the requirements, note the availability of compliance history information, and explain the procedures for filing discrimination complaints with AmeriCorps?</p> <p>b. Does the policy include information on civil rights requirements, complaint procedures and the rights of beneficiaries in member/volunteer service agreements, handbooks, manuals, pamphlets, and posted in prominent locations, as appropriate?</p> <p>c. Does the sponsor/grantee notify the public in recruitment material and application forms that it operates its program or activity subject to nondiscrimination requirements?</p>
References:	AmeriCorps Annual General Terms and Conditions, 45 CFR 2556

Monitoring Activity - SCP Programmatic

Purpose and Approach	The Senior Companion Program (SCP) review assesses the soundness of grantee policies, procedures and adherence to regulations in 45 CFR 2551, 45 CFR 2450, and other assurances, certifications, prohibitions, and regulatory requirements. The Monitoring Officer will request documents and conduct interviews to identify the program's capacity to execute federal funds to ensure compliance with the Code of Federal Regulations.
-----------------------------	---

Program-Specific (SCP)

06: SCP VOLUNTEER MANAGEMENT - SCP Programmatic

06.01.01	Do all volunteers meet the minimum age requirement at the time of enrollment?
References:	SCP Regulation: 45 CFR § 2551.41 (a)(1)
06.01.02	Are stipend volunteers all income eligible?
References:	45 § 2551.41(a)(2), 45 CFR 2551.43, 45 CFR § 2551.44
06.01.04	Review the volunteer assignment plans and complete the required interviews. Do the volunteer's service activities align with their plan?
References:	45 CFR §2551.71, 45 CFR § 2551.72, 45 CFR § 2551.73
06.01.05	Is there a designated supervisor providing regular and consistent support for each volunteer?
References:	SCP Regulation: 45 CFR §2551.62(f); §2551.71(a)(4)
06.01.06	Are supervisors adequately trained by the grantee to manage volunteers?
References:	SCP Regulation: 45 CFR §2551.62(f); §2551.71(a)(4),
06.01.07	Review Volunteer Assignment Plans and respond to these questions: Select NO if any of the above criteria are not met. a. Are all Senior Companions performing direct services to individual clients provided written volunteer assignment plans? b. Do records show that the plans are approved by the sponsor and accepted by the volunteer? c. Do the plans identify the client(s) to be served? d. Do the plans address the period the client(s) will receive the volunteer's services? e. Do the plans identify the roles and activities of the volunteer and the expected outcomes? f. Are all activities included in the assignment plan compliant?
References:	45 CFR § 2551.72, § 2551.73, §2551.71(a) and (b)
06.01.08	For SCP, do Senior Companions who directly serve clients serve one or more eligible adults in a manner that: results in person-to-person supportive relationships with each client served and that supports the achievement and maintenance of the highest level of independent living for their clients?
References:	SCP Regulation: 45 CFR §2551.71(a)
06.01.09	For SCP, does the project ensure that Senior Companions do not provide services such as those performed by medical personnel, services to large numbers of clients, custodial services, administrative support services, or other services that would detract from their assignment?
References:	45 CFR § 2551.71(b)
06.01.10	Does the grantee recognize AmeriCorps support? • Are projects visually identified as AmeriCorps (including, but not limited to logos, websites, social media, service gear and clothing) and following AmeriCorps brand guidelines? • Are volunteers provided information that projects are part of AmeriCorps? • Are there alterations to AmeriCorps logos or other brand identities? If yes, did the grantee receive prior written approval from AmeriCorps? • If applicable, do agreements with subsites explicitly state that the program is an AmeriCorps program?
References:	General Terms and Conditions

06.01.11	Does the progress report raw/source documentation provided demonstrate accuracy and validity of performance measure progress reported? If NO, write a brief explanation in the notes section below.
References:	Post Federal Award Requirements: Performance Measurement; FY22 General Terms and Conditions B. Other Applicable Terms and Conditions
06.02: SCP STATION OVERSIGHT	
06.02.01	Is there a current MOU for all volunteer stations, where volunteers are currently serving, signed within the past 3 years?
References:	SCP Regulation: 45 CFR §2551.23(c)(2)
06.02.02	Do MOUs meet the basic requirements as stated in the regulations, i.e.: a. Negotiated prior to volunteer placement; b. Specifies the mutual responsibilities of the station and sponsor; c. Renegotiated every 3 years; d. Contains the required non-discrimination commitment; e. Contains the required reasonable accommodation language?
References:	SCP Regulation: 45 CFR §2551.23(c)(2)
06.02.03	Does the project document that the volunteer stations are public or private non-profit agencies or organizations, with the exception of proprietary health care facilities? What is the grantees method for ensuring that volunteer station sites are appropriate per the regulations?
References:	SCP Regulation: 45 CFR §2551.23(e)(1)
06.02.04	Does the grantee monitor service site(s) to ensure compliance with grant requirements?
References:	Memorandum of Agreement; General Terms and Conditions; 2 CFR 200.303(c); 2 CFR 200.329(a)
06.03: Verification of Terms and Conditions	
06.03.01	Is there documentation to show that the recipient maintains a procedure for the filing and adjudication of grievances in alignment with 45 CFR § 1225? Documentation should outline the following at minimum: • Time frames for filing and response • Person who receives and responds to the complaints both informal (grantee personnel) and formal (EEOP Director of AmeriCorps or AmeriCorps designee) • Documentation required • Legal representation is allowed • Freedom from retaliation/reprisal • The process involved from initial filing, review, decisions made, corrective action, through close out
References:	45 CFR 1225
06.03.02	Does the grantee/sponsor organization have a non-discrimination policy that includes all of the federally required protected classes as listed below? • Race • Color • National origin • Gender/gender identity or expression • Age • Religion • Sexual orientation • Disability • Political affiliation • Marital or parental status • Genetic information • Military service
References:	AmeriCorps Annual General Terms and Conditions

06.03.03	<p>Based on information available to AmeriCorps, in the last two years, did the grantee document grievances and/or discrimination complaints and the corresponding follow up/response in compliance with applicable federal statutes as embodied in the program regulations?</p> <p>Has the sponsor or any of the volunteer stations had discrimination complaints filed against them regarding services provided under this grant or had civil rights compliance reviews regarding services conducted? Has the grantee or any service site had grievances/discrimination complaints filed against them?</p> <p>If the answer to any of the above questions is YES, review the following:</p>
	<ul style="list-style-type: none"> • Was the grievance/discrimination complaint or non-compliance substantiated?
	<ul style="list-style-type: none"> • Was relief or remedial action taken? (Please describe.)
References:	45 CFR 1225, AmeriCorps Annual General Terms and Conditions, 45 CFR 2551
06.03.04	Does the grantee/sponsor have a policy and procedure in place regarding the provision of reasonable accommodation to ensure accessibility as per the federal requirements?
References:	45 CFR 1203/1214/1232, Rehabilitation Act of 1973: Sections 504, 508
06.03.05	Does the sponsor/grantee have a policy and procedure in place for ensuring accessibility to persons with Limited English Proficiency?
References:	AmeriCorps Annual General Terms and Conditions, Executive Order 13166, 67 FR 64604, Title VI, Civil Rights Act 1964: Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons
06.03.06	<p>Does the grantee notify members, community beneficiaries, applicants, program staff, and the public, including those with impaired vision or hearing, that it operates in accordance with federal and program requirements on non-discrimination?</p> <p>a. Does the policy summarize the requirements, note the availability of compliance history information, and explain the procedures for filing discrimination complaints with AmeriCorps?</p> <p>b. Does the policy include information on civil rights requirements, complaint procedures and the rights of beneficiaries in member/volunteer service agreements, handbooks, manuals, pamphlets, and posted in prominent locations, as appropriate?</p> <p>c. Does the sponsor/grantee notify the public in recruitment material and application forms that it operates its program or activity subject to nondiscrimination requirements?</p>
References:	AmeriCorps Annual General Terms and Conditions, 45 CFR 2551

Monitoring Activity - FGP Programmatic	
Purpose and Approach	The Foster Grandparents Program (FGP) review assesses the soundness of grantee policies, procedures and adherence to regulations in 45 CFR 2552, 45 CFR 2450, and other assurances, certifications, prohibitions, and regulatory requirements. The Monitoring Officer will request documents and conduct interviews to identify the program's capacity to execute federal funds to ensure compliance with the Code of Federal Regulations.
Program-Specific (FGP)	
07.01: FGP VOLUNTEER MANAGEMENT - FGP Programmatic	
07.01.01	Eligibility: Do volunteers meet the minimum age requirement at the time of enrollment?
References:	FGP Regulation: 45 CFR § 2552.41 (a)(1)
07.01.02	Are stipended volunteers all income eligible?
References:	FGP Regulation: 45 CFR § 2552.41 (2); 45 CFR § 2552.44
07.01.04	Review the volunteer service agreements and complete the required interviews. Do the service activities of the volunteer align with the agreement?
References:	45 CFR §2552.72 and 45 CFR §2552.71
07.01.05	Is there a designated supervisor providing regular and consistent support for each volunteer?
References:	FGP Regulation: 45 CFR §2552.62(f); 45 CFR §2552.71(e)
07.01.06	Are supervisors adequately trained by the grantee to manage volunteers?
References:	FGP Regulation: 45 CFR §2552.62(f); 45 CFR §2552.71(e)
07.01.07	Review volunteer assignment plans and respond to these questions: (a) Are all Foster Grandparents provided written volunteer assignment plans? (b) Do records show that the plans are approved by the sponsor and accepted by the Foster Grandparent? (c) Do the plans identify the individual child(ren) to be served? (d) Do the plans address the period the child(ren) will receive the volunteer's services? (e) Do the plans identify the roles and activities of the volunteer and the expected outcomes for the child(ren)? (f) Are all activities included in the volunteer assignment plan compliant?
References:	FGP Regulation: 45 CFR § 2552.72
07.01.08	Approved activities: Complete the required volunteer interviews. For FGP, do all Foster Grandparents provide direct services to one or more eligible children that result in person-to-person supportive relationships with each child served and that support the development and growth of each child served?
References:	FGP: Regulation: 45 CFR § 2552.71 (a)-(c)
07.01.09	Approved activities: Complete the required volunteer interviews. For FGP, does the project ensure that Foster Grandparents are not assigned to roles such as teacher's aides, group leaders or other similar positions that would detract from the person-to-person relationship?
References:	FGP Regulation: 45 CFR §2552.71(a)-(c)
07.01.10	Does the grantee recognize AmeriCorps support? • Are projects visually identified as AmeriCorps (including, but not limited to logos, websites, social media, service gear and clothing) and following AmeriCorps brand guidelines? • Are volunteers provided information that projects are part of AmeriCorps? • Are there alterations to AmeriCorps logos or other brand identities? If yes, did the grantee receive prior written approval from AmeriCorps? • If applicable, do agreements with subsites explicitly state that the program is an AmeriCorps program?
References:	General Terms and Conditions

07.01.11	Does the progress report raw/source documentation provided demonstrate accuracy and validity of performance measure progress reported? If NO, write a brief explanation in the notes section below.
References:	2 CFR 200.301; General Terms and Conditions
07.02: FGP STATION OVERSIGHT	
07.02.01	Is there a current MOU for all volunteer stations, where volunteers are currently serving, signed within the past 3 years?
References:	FGP Regulation: 45 CFR §2552.23(c)(2)
07.02.02	Do MOUs meet the basic requirements as stated in the regulations, i.e.: a. Negotiated prior to volunteer placement; b. Specifies the mutual responsibilities of the station and sponsor; c. Renegotiated every 3 years; d. Contains the required non-discrimination commitment; e. Contains the required reasonable accommodation language?
References:	FGP Regulation: 45 CFR §2552.23(c)(2)
07.02.03	1) Does the project document that the volunteer stations are public or private non-profit agencies or organizations, with the exception of proprietary health care facilities? 2) What is your method for ensuring that volunteer stations are appropriate per the regulations?
References:	FGP Regulation: 45 CFR § 2552.23(c)(1)
07.02.04	Does the grantee monitor service site(s) to ensure compliance with grant requirements?
References:	Memorandum of Agreement; General Terms and Conditions; 2 CFR 200.303(c); 2 CFR 200.329(a)
07.03: Verification of Terms and Conditions	
07.03.01	Is there documentation to show that the recipient maintains a procedure for the filing and adjudication of grievances in alignment with 45 CFR § 1225? Documentation should outline the following at minimum: • Time frames for filing and response • Person who receives and responds to the complaints both informal (grantee personnel) and formal (EEOP Director of AmeriCorps or AmeriCorps designee) • Documentation required • Legal representation is allowed • Freedom from retaliation/reprisal • The process involved from initial filing, review, decisions made, corrective action, through close out
References:	45 CFR 1225 [These additional references are related to this question however are no longer maintained within the question/compliance determination. They are here to provide additional background information and context and for archival purposes. AmeriCorps Annual General Terms and Conditions, NCSA § 175, 176f or § 417 of the DVSA, 2 CFR § 3187.12, 45 CFR 2540.210, 45 CFR 4552]
07.03.02	Does the grantee/sponsor organization have a non-discrimination policy that includes all of the federally required protected classes as listed below? • Race • Color • National origin • Gender/gender identity or expression • Age • Religion • Sexual orientation • Disability • Political affiliation • Marital or parental status • Genetic information • Military service
References:	General Terms and Conditions These additional references are related to this question however are no longer maintained within the question/compliance determination. They are here to provide additional background information and context and for archival purposes. NCSA § 175, 176f or § 417 of the DVSA, 2 CFR § 3187.12, 45 CFR 2540.210, 45 CFR 4552

07.03.03	<p>Based on information available to AmeriCorps, in the last two years, did the grantee document grievances and/or discrimination complaints and the corresponding follow up/response in compliance with applicable federal statutes as embodied in the program regulations?</p> <p>Has the sponsor or have any of the service sites/volunteer stations had grievances and/or discrimination complaints filed against them regarding services provided under this grant or had civil rights compliance reviews regarding services conducted? Has the grantee or any service site had grievances/discrimination complaints filed against them?</p> <p>If the answer to any of the above questions is YES, review the following:</p> <ul style="list-style-type: none"> • Was the grievance/discrimination complaint or non-compliance substantiated? • Was relief or remedial action taken? (Please describe.)
References:	45 CFR 1225, General Terms and Conditions, 45 CFR 4552 These additional references are related to this question however are no longer maintained within the question/compliance determination. They are here to provide additional background information and context and for archival purposes. NCSA § 175, 176f or § 417 of the DVSA, 2 CFR § 3187.12, 45 CFR 2540.210
07.03.04	Does the grantee/sponsor have a policy and procedure in place regarding the provision of reasonable accommodation for staff and volunteers to ensure accessibility as per the federal requirements?
References:	45 CFR 1203/1214/1232, Rehabilitation Act of 1973: Sections 504, 508
07.03.05	Does the sponsor/grantee have a policy and procedure in place for ensuring accessibility to persons with Limited English Proficiency?
References:	AmeriCorps Annual General Terms and Conditions, Executive Order 13166, 67 FR 64604, Title VI, Civil Rights Act 1964: Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons
07.03.06	<p>Does the grantee notify members, community beneficiaries, applicants, program staff, and the public, including those with impaired vision or hearing, that it operates in accordance with federal and program requirements on non-discrimination?</p> <p>a. Does the policy summarize the requirements, note the availability of compliance history information, and explain the procedures for filing discrimination complaints with AmeriCorps?</p> <p>b. Does the policy include information on civil rights requirements, complaint procedures and the rights of beneficiaries in member/volunteer service agreements, handbooks, manuals, pamphlets, and posted in prominent locations, as appropriate?</p> <p>c. Does the sponsor/grantee notify the public in recruitment material and application forms that it operates its program or activity subject to nondiscrimination requirements?</p>
References:	AmeriCorps Annual General Terms and Conditions, 45 CFR 2552

Monitoring Activity - RSVP Programmatic

Purpose and Approach	The Retired Senior Volunteer Program (RSVP) review assesses the soundness of grantee policies, procedures and adherence to regulations in 45 CFR 2553, 45 CFR 2450, and other assurances, certifications, prohibitions, and regulatory requirements. The Monitoring Officer will request documents and conduct interviews to identify the program's capacity to execute federal funds to ensure compliance with the Code of Federal Regulations.
-----------------------------	--

Program-Specific (RSVP)

08.01: RSVP VOLUNTEER MANAGEMENT - RSVP Programmatic

08.01.01	Do volunteers meet the minimum age requirement at the time of enrollment?
References:	RSVP Regulation: 45 CFR § 2553.41 (a)(1)
08.01.02	Are all activities included in the description/assignment compliant?
References:	RSVP Regulation: 45 CFR §2553.12
08.01.03	Review the volunteer service agreements and complete the required interviews. Do the service activities of the volunteer align with the agreement?
References:	RSVP Regulation: 45 CFR §2553.12
08.01.04	Is there a designated supervisor providing regular and consistent support for each volunteer?
References:	RSVP Regulation: 45 CFR §2553.62(b); §2553.62(f)(3)
08.01.05	Are supervisors adequately trained by the grantee to manage volunteers?
References:	RSVP Regulation: 45 CFR §2553.62(b); §2553.62(f)(3)
08.01.07	Does the grantee recognize AmeriCorps support? <ul style="list-style-type: none"> • Are projects visually identified as AmeriCorps (including, but not limited to logos, websites, social media, service gear and clothing) and following AmeriCorps brand guidelines? • Are volunteers provided information that projects are part of AmeriCorps? • Are there alterations to AmeriCorps logos or other brand identities? If yes, did the grantee receive prior written approval from AmeriCorps? • If applicable, do agreements with subsites explicitly state that the program is an AmeriCorps program?
References:	General Terms and Conditions
08.01.08	Does the progress report raw/source documentation provided demonstrate accuracy and validity of performance measure progress reported?
References:	Post Federal Award Requirements: Performance Measurement; FY22 General Terms and Conditions B. Other Applicable Terms and Conditions

08.02: RSVP STATION OVERSIGHT

08.02.01	Is there a current MOU for all volunteer stations, where volunteers are currently serving, signed within the past 3 years?
References:	RSVP Regulation: 45 CFR §2553.23(c)(2)
08.02.02	Do MOUs meet the basic requirements as stated in the regulations, i.e.: <ul style="list-style-type: none"> a. Negotiated prior to volunteer placement; b. Specifies the mutual responsibilities of the station and sponsor; c. Renegotiated every 3 years; d. Contains the required non-discrimination commitment; e. Contains the required reasonable accommodation language?
References:	RSVP Regulation: 45 CFR §2553.23(c)(2)
08.02.03	1) Does the project document that the volunteer stations are public or private non-profit agencies or organizations, with the exception of proprietary health care facilities? 2) What is your method for ensuring that volunteer stations are appropriate per the regs?
References:	RSVP Regulation: 45 CFR §2553.23(c)(1)
08.02.04	Does the grantee monitor service site(s) to ensure compliance with grant requirements?
References:	Memorandum of Agreement; General Terms and Conditions; 2 CFR 200.303(c); 2 CFR 200.329(a)

08.03: Verification of Terms and Conditions	
08.03.01	<p>Is there documentation to show that the recipient maintains a procedure for the filing and adjudication of grievances in alignment with 45 CFR § 1225?</p> <p>Documentation should outline the following at minimum:</p> <ul style="list-style-type: none"> • Time frames for filing and response • Person who receives and responds to the complaints both informal (grantee personnel) and formal (EEOP Director of AmeriCorps or AmeriCorps designee) • Documentation required • Legal representation is allowed • Freedom from retaliation/reprisal • The process involved from initial filing, review, decisions made, corrective action, through close out
References:	45 CFR 1225
08.03.02	<p>Does the grantee/sponsor organization have a non-discrimination policy that includes all of the federally required protected classes as listed below?</p> <ul style="list-style-type: none"> • Race • Color • National origin • Gender/gender identity or expression • Age • Religion • Sexual orientation • Disability • Political affiliation • Marital or parental status • Genetic information • Military service
References:	AmeriCorps Annual General Terms and Conditions
08.03.03	<p>Based on information available to AmeriCorps, in the last two years, did the grantee document grievances and/or discrimination complaints and the corresponding follow up/response in compliance with applicable federal statutes as embodied in the program regulations?</p> <p>Has the sponsor or have any of the service sites/volunteer stations had grievances and/or discrimination complaints filed against them regarding services provided under this grant or had civil rights compliance reviews regarding services conducted? Has the grantee or any service site had grievances/discrimination complaints filed against them?</p> <p>If the answer to any of the above questions is YES, review the following:</p> <ul style="list-style-type: none"> • Was the grievance/discrimination complaint or non-compliance substantiated? • Was relief or remedial action taken? (Please describe.)
References:	45 CFR 1225, AmeriCorps Annual General Terms and Conditions, 45 CFR 2553
08.03.04	<p>Does the grantee/sponsor have a policy and procedure in place regarding the provision of reasonable accommodation to ensure accessibility as per the federal requirements?</p>
References:	45 CFR 1203/1214/1232, Rehabilitation Act of 1973: Sections 504, 508
08.03.05	<p>Does the sponsor/grantee have a policy and procedure in place for ensuring accessibility to persons with Limited English Proficiency?</p>
References:	AmeriCorps Annual General Terms and Conditions, Executive Order 13166, 67 FR 64604, Title VI, Civil Rights Act 1964: Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons
08.03.06	<p>Does the grantee notify members, community beneficiaries, applicants, program staff, and the public, including those with impaired vision or hearing, that it operates in accordance with federal and program requirements on non-discrimination?</p> <p>a. Does the policy summarize the requirements, note the availability of compliance history information, and explain the procedures for filing discrimination complaints with AmeriCorps?</p> <p>b. Does the policy include information on civil rights requirements, complaint procedures and the rights of beneficiaries in member/volunteer service agreements, handbooks, manuals, pamphlets, and posted in prominent locations, as appropriate?</p> <p>c. Does the sponsor/grantee notify the public in recruitment material and application forms that it operates its program or activity subject to nondiscrimination requirements?</p>
References:	AmeriCorps Annual General Terms and Conditions, 45 CFR 2553

Monitoring Activity - Days of Service Programmatic

Purpose and Approach

The Day of Service (DoS) review assesses September 11th and Martin Luther King, Jr. DoS projects to ensure consistency with project application, grant purpose, subaward oversight, and performance measure progress.

Program-Specific (Days of Service)

12.01: Activities - Days of Service Programmatic

12.01.01	Are service activities consistent with the approved project application?
References:	General Terms and Conditions
12.01.02	Are service activities consistent with the grant purpose as described in 42 U.S. Code § 12653 (i) Martin Luther King, Jr., Service Day or 42 U.S. Code § 12653 (k) September 11th Day of Service as applicable? (For MLK Day service activities shall consist of activities reflecting the life and teachings of MLK, Jr., and for 9/11 service activities include charitable and remembrance opportunities.)
References:	42 US Code § 12653 Additional Corporation activities to support national service DoS NOFO Section A.1. General Terms and Conditions
12.01.03	Were service activities carried out at a minimum of ten service sites?
References:	Day of Service Notice of Funding Opportunity; General Terms and Conditions
12.01.04	Did service activities occur either on September 11th or MLK Day as applicable or in close proximity to that date?
References:	42 U.S.C. § 12653; Day of Service Notice of Funding Opportunity; General Terms and Conditions
12.01.05	Does the grantee recognize AmeriCorps support?
	<ul style="list-style-type: none"> • Are projects visually identified as AmeriCorps (including, but not limited to logos, websites, social media, service gear and clothing) and following AmeriCorps brand guidelines? • Are volunteers provided information that projects are part of AmeriCorps? • Are there alterations to AmeriCorps logos or other brand identities? If yes, did the grantee receive prior written approval from AmeriCorps? • If applicable, do agreements with subrecipients or service locations explicitly state that the program is an AmeriCorps program?
References:	General Terms and Conditions, AmeriCorps Branding Page
12.01.06	Does the raw/source data provided demonstrate accuracy and validity of performance measure progress reported?
References:	Day of Service Notice of Funding Opportunity; General Terms and Conditions

12.02: DoS Subaward Competition

12.02.01	If applicable, are subawards made competitively?
References:	Day of Service Notice of Funding Opportunity; General Terms and Conditions
12.02.02	If applicable, is each subaward greater or equal to \$1,000 annually per subaward?
References:	Day of Service Notice of Funding Opportunity; General Terms and Conditions

12.03: Verification of Terms and Conditions

12.03.01	Is there documentation to show that the recipient maintains a procedure for the filing and adjudication of grievances in alignment with 45 CFR § 1225?
	Documentation should outline the following at minimum:
	<ul style="list-style-type: none"> • Time frames for filing and response • Person who receives and responds to the complaints both informal (grantee personnel) and formal (EEOP Director of AmeriCorps or AmeriCorps designee) • Documentation required • Legal representation is allowed • Freedom from retaliation/reprisal • The process involved from initial filing, review, decisions made, corrective action, through close out

References:	45 CFR 1225
12.03.02	<p>Does the grantee/sponsor organization have a non-discrimination policy that includes all of the federally required protected classes as listed below?</p> <ul style="list-style-type: none"> • Race • Color • National origin • Gender/gender identity or expression • Age • Religion • Sexual orientation • Disability • Political affiliation • Marital or parental status • Genetic information • Military service
References:	AmeriCorps Annual General Terms and Conditions
12.03.03	<p>Based on information available to AmeriCorps, in the last two years, did the grantee document grievances and/or discrimination complaints and the corresponding follow up/response in compliance with applicable federal statutes as embodied in the program regulations?</p> <p>Has the sponsor or have any of the service sites/volunteer stations had grievances and/or discrimination complaints filed against them regarding services provided under this grant or had civil rights compliance reviews regarding services conducted?</p> <p>Has the grantee or any service site had grievances/discrimination complaints filed against them?</p> <p>If the answer to any of the above questions is YES, review the following:</p> <ul style="list-style-type: none"> • Was the grievance/discrimination complaint or non-compliance substantiated? • Was relief or remedial action taken? (Please describe.)
References:	45 CFR 1225, AmeriCorps Annual General Terms and Conditions
12.03.04	Does the grantee/sponsor have a policy and procedure in place regarding the provision of reasonable accommodation for staff and volunteers to ensure accessibility as per the federal requirements?
References:	45 CFR 1203/1214/1232, Rehabilitation Act of 1973: Sections 504, 508
12.03.05	Does the sponsor/grantee have a policy and procedure in place for ensuring accessibility to persons with Limited English Proficiency?
References:	AmeriCorps Annual General Terms and Conditions, Executive Order 13166, 67 FR 64604, Title VI, Civil Rights Act 1964: Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons
12.03.06	<p>Does the grantee notify members, community beneficiaries, applicants, program staff, and the public, including those with impaired vision or hearing, that it operates in accordance with federal and program requirements on non-discrimination?</p> <p>a. Does the policy summarize the requirements, note the availability of compliance history information, and explain the procedures for filing discrimination complaints with AmeriCorps?</p> <p>b. Does the policy include information on civil rights requirements, complaint procedures and the rights of beneficiaries in member/volunteer service agreements, handbooks, manuals, pamphlets, and posted in prominent locations, as appropriate?</p> <p>c. Does the sponsor/grantee notify the public in recruitment material and application forms that it operates its program or activity subject to nondiscrimination requirements?</p>
References:	AmeriCorps Annual General Terms and Conditions, relevant program regulations: 45 CFR Parts 2540 (ASN), 45 CFR 2551 (SCP), 45 CFR 2552 (FGP), 45 CFR 2553 (RSVP), and 45 CFR 2556 (VISTA).
12.04.01	<p>Does the grantee have a policy on Prohibited Activities?</p> <p>Are members/volunteers, site supervisors, and prime staff aware of prohibited activities applicable to their respective programs? (Able to name at least two)</p> <p>b. Does the policy include information on civil rights requirements, complaint procedures and the rights of beneficiaries in member/volunteer service agreements, handbooks, manuals, pamphlets, and posted in prominent locations, as appropriate?</p>
References:	

Monitoring Activity - National Service Criminal History Check (NSCHC)

Purpose and Approach	The NSCHC monitoring activity consists of three components: 1) Review of NSCHC policy or procedure to provide recommendations for improvement (not for compliance); 2) Review of e-course training certificate for compliance with grant specific terms and conditions; 3) Review of check records for covered individuals for compliance with 45 CFR §2540.200-207.
-----------------------------	--

NATIONAL SERVICE CRIMINAL HISTORY CHECK (NSCHC)

OM Staff should include reasoning (e.g. examples, document references, interview responses, etc.) for all compliance determinations in the notes box below each question.

09.01: NSCHC Policy

09.01.01	Does the organization have a policy or procedure describing the internal process for conducting NSCHC?
References:	
09.01.02	Does the NSCHC policy or procedure cover all recommended topics, as applicable?
Sub Reference:	Covered Positions (45 CFR §2540.201)
	<ul style="list-style-type: none"> • The policy correctly explains who is subject to the NSCHC process (as applicable to the grant/program).
Sub Reference:	Eligibility (45 CFR §2540.202)
	<ul style="list-style-type: none"> • The policy correctly outlines the eligibility criteria / describes ineligible individuals as listed in 45 CFR § 2540.202.
Sub Reference:	Nondiscriminatory Screening Criteria (45 CFR §2540.203)
	<ul style="list-style-type: none"> • Grantees may establish screening criteria beyond the NSCHC eligibility requirements specified in 45 CFR § 2540.202. If establishing screening criteria beyond the NSCHC eligibility requirements, the policy requires that the program ensure suitability criteria are consistent with state and Federal Civil Rights and nondiscrimination laws.
Sub Reference:	Check Components (45 CFR §2540.204)
	<ul style="list-style-type: none"> • The policy correctly specifies what NSCHC components are required: (1) a nationwide check of the NSOPW.gov, (2) a check of the individual's state of residence and state of service, and (3) a fingerprint-based check of the FBI. • The policy identifies which AmeriCorps-approved sources will be used for all levels of NSCHC as listed in 45 CFR § 2540.204. • The policy explains the process used to determine the current first and last name used on a name-based check. • The policy describes how the program determines the applicant's state of residence. • If not using Truescreen, the policy includes a requirement to conduct a subsequent NSOPW.gov check if states/territories are not
Sub Reference:	Timing (45 CFR §2540.205)
	<ul style="list-style-type: none"> • The policy explains the timing requirement: that all checks are conducted, reviewed, and an eligibility determination made by the recipient no later than the day before the start date of work or service. • The policy requires the full NSCHC to be conducted again if an individual's relationship with the organization is terminated (break in work or service) for a period of more than 180 days.
Sub Reference:	Review and Eligibility Determination / Adjudication (45 CFR §2540.205)
	<ul style="list-style-type: none"> • The policy describes the process for staff to review results and make an eligibility determination, including documenting when this takes place. • The policy ensures that staff requiring NSCHC are not responsible for reviewing and adjudicating their own check results. • If using the AmeriCorps-approved vendors, the policy describes the process to determine eligibility if a vendor's adjudication recommendation is 'not to recommend'. • If not using Truescreen, the policy describes the process for resolving any hits that have the same name as the applicant on the NSOPW.gov check.
Sub Reference:	Procedures and Documentation (45 CFR §2540.206)
	<ul style="list-style-type: none"> • The policy requires the program to obtain a person's consent before conducting the state and FBI components of the National Service Criminal History Check. • The policy describes how notice is provided to the individual that selection into the program is contingent upon the organization's review of the individual's NSCHC results. • The policy requires that a program provide a reasonable opportunity for the individual to review and challenge the factual accuracy of a result before action is taken to exclude the individual from the position. • The policy requires the program to provide safeguards to ensure the confidentiality of any information relating to the criminal history check, consistent with authorization provided by the applicant. • The policy requires the program to maintain documentation of the NSCHC as grant records. • The policy ensures that the individual is not charged for the cost of any component of a NSCHC, unless specifically approved by AmeriCorps.
Sub Reference:	Waivers (45 CFR §2540.207)
	<ul style="list-style-type: none"> • If the program uses any AmeriCorps' pre-approved NSCHC waivers (as listed in the NSCHC Manual, effective May 1, 2021), the policy correctly describes the terms of the pre-approved waivers used, and are the references current.

	<ul style="list-style-type: none"> If the program has any individual- or program-level waivers approved by AmeriCorps, whether expired or current, the policy references such waivers and requires that appropriate documentation be retained.
Sub Reference:	Training (Program-Specific Terms and Conditions)
	<ul style="list-style-type: none"> The policy requires that at minimum one staff person who has some responsibility for NSCHC compliance take the AmeriCorps-designated e-Course annually on behalf of the organization and retain documentation of e-Course completion. The policy identifies staff position(s) with responsibility for the NSCHC process.
Sub Reference:	AmeriCorps-Approved Vendor Accounts
	<ul style="list-style-type: none"> If using an AmeriCorps-approved vendor Truescreen or Fieldprint, the policy supports management and continuity of the account(s), i.e. lists the individuals with account access, ensures access is transferred from exiting employees, references vendor contact information, etc.
Sub Reference:	Monitoring
	<ul style="list-style-type: none"> If applicable, the policy includes a process for monitoring sub-recipients and/or service locations if they are responsible for any part of the NSCHC process.
Sub Reference:	Policy Maintenance
	<ul style="list-style-type: none"> The policy includes a process for being updated to ensure it reflects current regulations, guidance, and program practices, including the staff position(s) responsible.
References:	Grant Specific Terms and Conditions: Section on National Service Criminal History Check Training
09.02 NSCHC Training	
09.02.01	Has at least one staff member completed the required NSCHC e-course training within the past year?
References:	Grant Specific Terms and Conditions: Section on National Service Criminal History Check Training
09.03. NSCHC Records	
09.03.01	<p>Were all NSCHC records compliant?</p> <p>Enter the number of issues found for each issue below.</p>
References:	45 CFR 2540.200-207
	Total number of records with noncompliance.
Sub Reference:	Check components (45 CFR § 2540.204)
	<ul style="list-style-type: none"> Missing NSOPW check Missing state of service check Missing state of residence check Missing FBI check
Sub Reference:	Check sources (45 CFR § 2540.204)
	<ul style="list-style-type: none"> NSOPW check not from approved source State check not from approved source FBI check not from approved source
Sub Reference:	NSOPW nationwide (45 CFR § 2540.204)
	<ul style="list-style-type: none"> NSOPW check missing reporting jurisdictions
Sub Reference:	Name-based checks (45 CFR § 2540.204)
	<ul style="list-style-type: none"> Missing valid name documentation NSOPW check name does not match name documentation Name-based state check name does not match name documentation Name-based FBI check name does not match name documentation
Sub Reference:	Timing (45 CFR § 2540.205)
	<ul style="list-style-type: none"> NSOPW check not adjudicated on time State check not adjudicated on time FBI check not adjudicated on time
Sub Reference:	Review and eligibility determination / adjudication (45 CFR §2540.205)
	<ul style="list-style-type: none"> NSOPW check not adjudicated State check not adjudicated FBI check not adjudicated Fieldprint adjudicated without viewing results
Sub Reference:	Consent (45 CFR § 2540.206)
	<ul style="list-style-type: none"> Missing consent documentation Consent form not signed before state/FBI checks conducted
Sub Reference:	Notice that selection contingent upon review of NSCHC results (45 CFR § 2540.206)
	<ul style="list-style-type: none"> Missing documentation of notice that selection is contingent on NSCHC results
Sub Reference:	Documentation of eligibility if vendor's adjudication recommendation does not endorse the candidate (45 CFR § 2540.202; 45 CFR § 2540.205)
	<ul style="list-style-type: none"> Truescreen NSOPW not in pass status and missing documentation candidate is eligible to serve/work Truescreen state check not in pass status and missing documentation candidate is eligible to serve/work

	• Fieldprint check not cleared and missing documentation candidate is eligible to serve/work
Sub Reference:	Waiver (45 CFR § 2540.207)
	• Noncompliant with terms of approved NSCHC waiver
Sub Reference:	Eligibility (45 CFR § 2540.202)
	• Individual appears ineligible from NSCHC results
Sub Reference:	Other
	Other

Monitoring Activity - Prohibited Activities

Purpose and Approach	The Prohibited Activities monitoring review determines compliance regarding activities which are restricted, prohibited, must be adhered to for non-Federal entities receiving grant funds per 2 CFR 200 or AmeriCorps grants per 45 CFR 2520.65. This monitoring review is completed mainly through responses received via interviews (prime grantee staff, site supervisors, and members/volunteers), but also prohibited activity policies, evidence of training, and review of assignment descriptions. The Monitoring Officer will request documents and conduct interviews to identify the program's capacity to compliantly implement allowable grant-funded activities.
-----------------------------	---

Prohibited Activities

10.01. PROHIBITED ACTIVITIES

10.01.01	Do member/volunteer service activities align with their position descriptions/assignment plans?
References:	General Prohibited Activities References General: 45 CFR 2540.100; 45 CFR 1226.8; 45 CFR 1226.10 Exceptions: 45 CFR 1226.9
10.01.02	Are members/volunteers, site supervisors, and prime staff aware of prohibited activities applicable to their respective programs?
References:	General Prohibited Activities References General: 45 CFR 2540.100; 45 CFR 1226.8; 45 CFR 1226.10 Exceptions: 45 CFR 1226.9
10.01.03	Do prime staff provide appropriate training to members/volunteers on prohibited activities?
References:	General Prohibited Activities References General: 45 CFR 2540.100; 45 CFR 1226.8; 45 CFR 1226.10 Exceptions: 45 CFR 1226.9
10.01.04	Do prime staff provide appropriate training to site supervisors on prohibited activities?
References:	General Prohibited Activities References General: 45 CFR 2540.100; 45 CFR 1226.8; 45 CFR 1226.10 Exceptions: 45 CFR 1226.9
10.01.05	Do site supervisors provide appropriate oversight of the members/volunteers with regard to prohibited activities?
References:	General Prohibited Activities References General: 45 CFR 2540.100; 45 CFR 1226.8; 45 CFR 1226.10 Exceptions: 45 CFR 1226.9
10.01.06	Do prime staff provide appropriate monitoring and oversight of service sites with regard to prohibited activities?
References:	General Prohibited Activities References General: 45 CFR 2540.100; 45 CFR 1226.8; 45 CFR 1226.10 Exceptions: 45 CFR 1226.9
10.01.07	Do interviews indicate that members/volunteers and prime staff do NOT engage in prohibited activities?
References:	General Prohibited Activities References General: 45 CFR 2540.100; 45 CFR 1226.8; 45 CFR 1226.10 Exceptions: 45 CFR 1226.9
10.01.08	Does the prime grantee or sponsor have a policy on Prohibited Activities?
References:	General Prohibited Activities References General: 45 CFR 2540.100; 45 CFR 1226.8; 45 CFR 1226.10 Exceptions: 45 CFR 1226.9
10.01.09	Is there any evidence that individuals involved in the project misuse authority or their position for personal financial gain or the gain of an immediate or close family member or business associate?
References:	Annual General Terms and Conditions, 2 CFR 200.318(c)(1), FGP and SCP Terms and Conditions, RSVP Terms and Conditions, 45 CFR 2551.121, 45 CFR 2552.121, 45 CFR 2553.91, VISTA Memorandum of Agreement
10.01.10	Is there evidence the grantee is falsely enrolling service members?
References:	AmeriCorps Annual General Terms and Conditions; Agency Fraud Risk Priority based on risk assessment

Monitoring Activity - New to AmeriCorps Grantee

Purpose and Approach	The New to AmeriCorps monitoring review is intended to assist grantees that have recently received AmeriCorps funding in setting their organizations up for successful and compliant program administration. Generally, grantees assigned this activity are organizations that have entered the AmeriCorps portfolio within the last calendar year. The activity is comprised of select questions from previously existing Monitoring Activities in the Uniform Monitoring Package including the Financial and Operational Fitness Assessment, Program Specific Activities, Prohibited Activities review, Subrecipient Activity, and National Service Criminal History Check review. Monitoring is completed in the same manner as the associated activities mentioned, however, is limited in scope to the review of policies, procedures, and select records only. Monitoring Staff requests documents and conducts follow up conversations with grantees as needed to assess the compliance in the initial set up of the program respective of regulations and requirements.
-----------------------------	---

New to AmeriCorps Grantee

11.01: REPORTING

11.01.01	Review the sponsor's/grantee's chart of accounts. Can the sponsor/grantee segregate revenue and expenses by project or grant? If NO, describe the deficiency in the notes section below.
References:	2 CFR 200.302; 2 CFR 200.328
11.01.02	Does the sponsor/grantee have a policy and procedure to manage Federal cash drawdowns? If NO, briefly describe in the notes section below.
References:	2 CFR 200.305
11.01.03	If there is a policy and procedure to manage cash drawdowns, do they include the following minimum elements? <ul style="list-style-type: none"> • Cash is drawn on a reimbursement or 'as-needed' basis, and not drawn in advance of need • The Non-Federal entity minimizes the time between drawing down and dispersal of cash • Procedural steps that outline the approval and drawdown process, including who is responsible for each action
References:	2 CFR 200.305
11.01.04	Review the Segregation of Duties Worksheet filled out by the sponsor/grantee. Does there appear to be adequate segregation of duties amongst staff for key financial functions?
References:	2 CFR 200.303
11.01.05	Does the sponsor's/grantee's written financial policies explicitly state the internal controls in place, consistent with the workbook's results?
References:	2 CFR 200.303
11.01.06	Is the grantee compliant with the Standards for Documentation of Personnel Expenses (e.g. Timekeeping)? Consider the sponsor's/grantee's policies around documentation of personnel expenses, sample timesheets, and information provided during the FOIA interview. Does the provided information reflect the necessary components for documentation of personnel expenses as outlined below? <ul style="list-style-type: none"> • Charges to the grant for salaries and wages are based on records (e.g. timesheets) that accurately reflect the work performed. These records must: <ul style="list-style-type: none"> o Be supported by a system of internal control that provides reasonable assurance that charges are accurate, allowable, and properly allocated. o Incorporated into the official records of the organization o Reasonably reflects the total activity for which employee is compensated o Comply with the grantee's accounting policies and practices • For an employee who is billed less than 100% to the grant, salary or wages are allocated to specific activities or cost objectives
	If NO, briefly describe the deficiencies in the notes section below. Note: For state, local governments and Indian tribes: Other processes or systems for allocating salaries and wages to Federal awards may be used in place of or in addition to the records described above if approved by the cognizant agency for indirect cost. Such systems may include, but are not limited to, random moment sampling, "rolling" time studies, case counts, or other quantifiable measures of work performed.
References:	2 CFR 200.430, 2 CFR 200.431, 2 CFR 200.413(c), 2 CFR 200.416, 2 CFR 200.430(i)

11.01.07	Does the sponsor/grantee have a procurement policy?
References:	2 CFR 200.317-327
11.01.08	If there is a policy, does it include the following minimum elements?
	<ul style="list-style-type: none"> Standards of conduct that cover at minimum conflicts of interest and disciplinary actions to be applied for violations of such standards Delineation of purchase thresholds, Single source provisions, and Necessary affirmative steps to assure minority businesses, women's business enterprises, and labor surplus area firms are used when possible
References:	2 CFR 200.317-327
11.01.09	Does the grantee have a policy or procedure on how they will monitor their subrecipients to ensure compliance with AmeriCorps and grant regulations?
References:	2 CFR 200.332 (b, d, g-h)
11.01.10	Does the policy describe:
	<ul style="list-style-type: none"> The reports, both financial and programmatic, that will be collected and reviewed by the grantee; How the grantee will follow-up and ensure that any findings or issues uncovered during an audit, site visit, or by other means are resolved; and How management decision are issued for audit findings pertaining to the Federal award provided to the subrecipient from the pass-through entity.
References:	2 CFR §200.332 (d);2 CFR §200.521
11.02: Program Specific	
11.02.01	Is there documentation to show that the recipient maintains a procedure for the filing and adjudication of grievances in alignment with 45 CFR § 1225? Documentation should outline the following at minimum:
	<ul style="list-style-type: none"> Time frames for filing and response Person who receives and responds to the complaints both informal (grantee personnel) and formal (EEOP Director of AmeriCorps or AmeriCorps designee) Documentation required Legal representation is allowed Freedom from retaliation/reprisal The process involved from initial filing, review, decisions made, corrective action, through close out
References:	45 CFR 1225
11.02.02	Does the organization have a non-discrimination policy that includes all of the federally required protected classes as listed below?
	<ul style="list-style-type: none"> Race Color National origin Gender/gender identity or expression Age Religion Sexual orientation Disability Political affiliation Marital or parental status Genetic information Military service
References:	AmeriCorps Annual General Terms and Conditions
11.02.03	Does the grantee notify members, community beneficiaries, applicants, program staff, and the public, including those with impaired vision or hearing, that it operates in accordance with federal and program requirements on non-discrimination?
	Does the grantee notify members, community beneficiaries, applicants, program staff, and the public, including those with impaired vision or hearing, that it operates in accordance with federal and program requirements on non-discrimination?
	Does the policy summarize the requirements, note the availability of compliance history information, and explain the procedures for filing discrimination complaints with AmeriCorps?
	Does the policy include information on civil rights requirements, complaint procedures and the rights of beneficiaries in member/volunteer service agreements, handbooks, manuals, pamphlets, and post it in prominent locations, as appropriate?
	Does the sponsor/grantee notify the public in recruitment material and application forms that it operates its program or activity subject to nondiscrimination requirements?
References:	AmeriCorps Annual General Terms and Conditions, relevant program regulations: 45 CFR Parts 2540 (ASN), 45 CFR 2551 (SCP), 45 CFR 2552 (FGP), 45 CFR 2553 (RSVP), and 45 CFR 2556 (VISTA).

11.02.04	<p>Does the grantee have a system to follow required timekeeping practices for their members/volunteers?</p> <ul style="list-style-type: none"> • For ASN: Member fundraising time is limited to 10% of the maximum allowable number of service hours, and member training is limited to 20% or less of the total aggregate agreed-upon member service hours in the program. Does the program have a process for ensuring member hours are tracked and do not exceed the percentage limit for: <ul style="list-style-type: none"> o Fundraising o Member education and training • For VISTA: <ul style="list-style-type: none"> o Is there evidence that VISTAs, Summer Associates, and/or VISTA Leaders are serving full-time? (Does the template show a way to count weekly hours?) o Is there evidence that the grantee is documenting time attendance in relation to allowed Leave benefits for VISTA Volunteers? (Does the • For AmeriCorps Seniors: Does the grantee maintain timesheets or electronic time and attendance records that: <ul style="list-style-type: none"> o Display the actual hours served by each volunteer o Are signed or validated by the individual volunteer and the responsible volunteer station supervisor (on the template, is there a place for signatures / certification?)
References:	<p>ASN - 45 CFR 2520.45 and 45 CFR 2530.50 ACS: 45 CFR 2552.51 VISTA: DVSA Sec. 104, 42 U.S.C. § 4954 (a), 45 CFR 2556.205, VISTA Member Handbook Chapter 1</p>
11.02.05	<p>Do prime staff provide appropriate training to site supervisors on prohibited activities?</p>
References:	<p>General: 45 CFR 2540.100/45 CFR 1226.8; 45 CFR 1226.10; 45 CFR 1226.11 (training); 2 CFR 200.303(c), 2 CFR 200.329(a) Exceptions: 45 CFR 1226.9</p>
11.02.06	<p>If applicable, does the grantee/sponsor have a finalized template for subrecipient agreements?</p>
References:	<p>2 CFR 200.332</p>
11.02.07	<p>Does the subrecipient agreement template contain all the required elements:</p> <ul style="list-style-type: none"> • Clear identification as a subaward • Federal Award Identification • All requirements imposed by the pass-through entity on the subrecipient so that the Federal award is used in accordance with Federal statutes, regulations and the terms and conditions of the Federal award • Any additional requirements that the pass-through entity imposes on the subrecipient in order for the pass-through entity to meet its own responsibility to the Federal awarding agency including identification of any required financial and performance reports • An approved federally recognized indirect cost rate negotiated between the subrecipient and the Federal Government or, if no such rate exists, either a rate negotiated between the pass-through entity and the subrecipient (in compliance with this part), or a de minimis indirect cost rate as defined in Â§200.414 Indirect (F&A) costs, paragraph (f) • A requirement that the subrecipient permit the pass-through entity and auditors to have access to the subrecipient's records and financial statements as necessary for the pass-through entity to meet the requirements of this part; and • Appropriate terms and conditions concerning closeout of the subaward.
References:	<p>2 CFR §200.332 (a); 2 CFR § 200.344</p>
11.02.08	<p>If applicable, does the grantee/sponsor have a finalized template for service site/volunteer station agreements/MOU's? (For ASN select Compliant; if there is no template, select Compliant and write in a Recommendation for Improvement.)</p>
References:	<p>45 CFR 2551.23 45 CFR 2552.23 45 CFR 2553.23</p>
11.02.09	<p>Does the service site agreement template contain all the required elements (compliant and recommendation for improvement for ASN if no)?</p>
References:	<p>45 CFR §2551.23(c)(2) 45 CFR 2552.23 45 CFR 2553.23</p>
11.02.10	<p>(ASN Only) Does the grantee have a template for member service agreements?</p>
References:	<p>ASN Terms and Conditions</p>
11.02.11	<p>Does the service agreement template contain all the required elements as follows (ASN only - N/A for VISTA and ACS)?</p> <ul style="list-style-type: none"> • Description of the member's role • The minimum number of service hours (as required by statute) and other requirements (as developed by the recipient) necessary to successfully complete the term of service and to be eligible for the education award

- The amount of the education award being offered for successful completion of the terms of service in which the individual is enrolling
- Standards of conduct, as developed by the recipient or sub recipient
- The list of prohibited activities, including those specified in the regulations at 45 CFR § 2520.65
- The text of 45 CFR §§ 2540.100(e)-(f), which relates to Nonduplication and Nondisplacement
- The text of 45 CFR §§ 2520.40-.45, which relates to fundraising by members;
- Requirements under the Drug-Free Workplace Act (41 U.S.C. § 701 et seq.)
- Civil rights requirements, complaint procedures, and rights of beneficiaries
- Suspension and termination rules
- The specific circumstances under which a member may be released for cause
- Grievance procedures; and
- Other requirements established by the recipient.

References: ASN Terms and Conditions

11.03: NSCHC

11.03.01 Does the organization have a policy or procedure describing the internal process for conducting NSCHC?

References:

11.03.02 Does the NSCHC policy or procedure cover all recommended topics, as applicable?

References:

11.03.03 Do the grantee's responses to the NSCHC Record Review Form align with the submitted NSCHC policy when it comes to the following NSCHC components?

- Process for obtaining consent
- Process for running each check (vendor / repository)
- Process for documenting adjudication

References:

11.03.04 Does the submitted NSCHC record demonstrate implementation of the organization's NSCHC policy when it comes to the following NSCHC components?

- Process for obtaining consent
- Process for running each check (vendor / repository)
- Process for documenting adjudication

References:

11.03.05 Are all components of the submitted NSCHC record compliant?

References: 45 CFR 2540 200-207