



AmeriCorps Program Monitoring Process

OVERVIEW

ServeNebraska – the Nebraska Volunteer Service Commission - monitors applicants and sub-grantees (“programs”) to promote the highest standards of quality and efficiency in providing AmeriCorps programming to Nebraskans. Our review maximizes compliance with applicable federal, state, and Commission policies, evaluates the quality of the community service provided, and gauges the member experience while serving in AmeriCorps. We value our partnerships with community-based service providers, and view the monitoring process as a means of fostering continual improvement.

ServeNebraska is committed to communicating clear expectations to programs; providing timely guidance focused on compliance, performance, and quality issues; and helping programs continuously improve their operations and impact. A “risk-based” monitoring approach helps ServeNebraska monitor programs in an efficient and strategic way.

Risk Based Monitoring

ServeNebraska staff uses a variety of methods to monitor AmeriCorps programs. A risk-based approach determines the appropriate strategy for – and level of -- program monitoring that is needed for each program. In evaluating a program’s risk level, the following factors are considered:

- Experience as a subgrantee
- Experience in managing federal or state awards
- Past and current monitoring/compliance issues
- Size and/or complexity of grant
- Program history in meeting performance measures / objectives
- A-133 Audit findings
- Financial management issues
- Staff tenure
- Agency infrastructure and support
- Prior site visits and findings
- Adequacy and timeliness of program and financial reports
- Responsiveness to ServeNebraska staff
- Member retention and enrollment rates
- Rate of participation in ServeNebraska training and other events

A risk assessment – by Program and Fiscal/Operations Officers – is conducted for each program prior to determination of funding for the subsequent year as part of the Pre-Award process during the grant application process. In 2012-2013, a risk assessment will also be conducted following the

completion of on-site or desk audits of programmatic and financial records. The numerical result of the assessment of the risk factors result in categorizing AmeriCorps programs into one of three risk levels: High Risk, Medium Risk, or Low Risk. All programs that are first time applicants or in their initial year of operation are considered High Risk since there is no organizational history with AmeriCorps.

The table below serves as a basic guide for the level of Program Monitoring based on risk. The intensity of review for each action may vary based upon risk level.

Action	Low Risk	Medium Risk	High Risk
Pre-award Risk Assessment	√	√	√
Start-Up Document Review	√	√	√
A-133 Audit Review	√	√	√
Quarterly Progress Reports	√	√	√
Monthly Periodic Expense Reports	√	√	√
Quarterly Federal Financial Reports	√	√	√
Annual Program Evaluation	√	√	√
Start-Up Orientation & Review	√	√	√
Staff Launch Training Attendance	√	√	√
Statewide AmeriCorps Member Kick-Off Attendance	√	√	√
Onsite Programmatic Site Visit	√	√	√
Member File Review	√	√	√
Programmatic Site Visit Follow-Up		√	√
Program Leader Surveying	√	√	√
Site Supervisor Survey	√	√	√
Member Survey	√	√	√
Fiscal Officer Orientation & Interview	√	√	√
Fiscal File Review	√	√	√
Onsite Fiscal Site Visit	√	√	√
Fiscal Desk Audit (in lieu of onsite visit) *	√		
Technical Assistance to Maximize Compliance		√	√

* This option will be available to Low Risk programs which had no identified concerns in the prior year financial review. In no cases will any program go more than 2 years without an onsite fiscal site visit.

NOTE: ServeNebraska may, based on an individual program’s dynamics, opt to perform additional compliance checks beyond the oversight listed above for the risk-assessment rating. ServeNebraska may also request additional oversight or technical assistance if risk management or compliance issues are considerable and/or recurring.

SERVENEBRASKA STAFF ROLES

All AmeriCorps programs are aided and monitored by the ServeNebraska Program Officers, who serve as the primary liaison between ServeNebraska and Nebraska’s AmeriCorps State & National programs. The Senior Program Officer is Greg Donovan (402-471-6249 or greg.donovan@nebraska.gov). The AmeriCorps/Disability Officer is Cathy Plager (402-471-6226 or cathleen.plager@nebraska.gov). The Training Officer is Kimberle Hall (402-471-6228 or kim.hall@nebraska.gov).

These Program Officers are responsible for the development of AmeriCorps programming. Regarding monitoring, the Senior Program Officer coordinates programmatic oversight and strives to ensure adherence to AmeriCorps Provisions, federal regulations, Nebraska State law, and ServeNebraska policies and expectations. To this end, the Program Officers monitor member service, progress towards outcomes, and use of AmeriCorps funds. The Program Officers also provide technical assistance and mentoring to program staff -- working with programs to implement continuous improvement and pursue programmatic excellence.

The ServeNebraska Program Officers proactively share information and developments with sub-grantees. Additionally, sub-grantee AmeriCorps Program Directors are expected to subscribe to relevant Corporation for National & Community Service e-mail discussion lists and contact the ServeNebraska Program Officers with programmatic questions and concerns. Ongoing communications include regular contact by phone, e-mail, in person, and by standard mail.

For financial and budgetary concerns, the primary liaison between ServeNebraska and AmeriCorps applicants and subgrantees is the ServeNebraska Fiscal/Operations Officer. The Fiscal/Operations Officer is also the liaison between ServeNebraska, AmeriCorps subgrantees and the ServeNebraska fiscal agent -- State of Nebraska Department of Health & Human Services Accounting. The ServeNebraska Fiscal/Operations Officer is Janet Schmidt (402-471-6212 or janet.schmidt@nebraska.gov).

The Fiscal/Operations Officer provides financial guidance to ensure proper stewardship of federal funds as outlined by AmeriCorps Provisions, federal regulations, Nebraska State law, and ServeNebraska fiscal policies and procedures. The Fiscal/Operations Officer also provides technical assistance to programs & their program fiscal directors, conducts fiscal on-site visits and desk audits, monitors program expenditures and match percentages through the Federal Financial Reports (FFRs) and reimbursement requests [Periodic Expense Reports (PERs)], processes program PERs, and facilitates end-of-year grant closeouts.

PRE-AWARD MONITORING

Prior to the grant award, ServeNebraska takes measures to assess the grant applicant's capacity to manage an AmeriCorps program. In order to assist an organization's capacity to operate an AmeriCorps program, ServeNebraska posts "Is My Organization Ready for AmeriCorps: A READINESS ASSESSMENT" on its website. This self assessment is designed to let organizational staff honestly evaluate the ability to successfully administer a national service program.

Once an application for funding is received, the following steps are completed:

- ➔ ServeNebraska staff will verify the application is complete and compliant with the terms of the Request for Applications
- ➔ All new applicant agencies will complete and submit to the ServeNebraska Fiscal/Operations Officer a "Financial Assessment Survey" prior to determination of funding. This survey is structured to measure the degree of financial risk that could be incurred by ServeNebraska.

- ➔ Each program's level of risk will be assessed using a standard "risk assessment" tool that takes into account the performance of the program to date. Recurring issues and compliance citations are included in this report, which is prepared by the Program and Fiscal/Operations Officers. All programs that are first time applicants or in their initial year of operation are considered High Risk since there is no organizational history with AmeriCorps.

These assessments will be available for reference and consideration as ServeNebraska – through its committees and action as a whole – conducts grant reviews and makes funding recommendations.

After funding has been confirmed by the Corporation for National & Community Service, the ServeNebraska Program Officers will take the following actions to ensure that programs are adequately prepared for the grant year:

- 1. Distribution of standard AmeriCorps Member and Host Site Agreements:** For consistency and enhanced compliance, ServeNebraska has developed standardized AmeriCorps Member Contracts and AmeriCorps Host Site Agreements for use by AmeriCorps*State programs within Nebraska.
- 2. Document Review:** The Program Officer will solicit and analyze documents that are vital for successful program administration. Input may be sent to the Program Director and changes may be required prior to or shortly after the enrollment of members.
- 3. Distribution of Policies & Procedures:** All programs will be made aware of the AmeriCorps Provisions and the Corporation for National & Community Service regulations and rules. Additionally, all Program Directors – or designee – will be expected to subscribe to the AmeriCorps E-mail Discussion List. Relevant ServeNebraska policies will be made available to all operating AmeriCorps programs. As policy changes and other developments occur, the Program Officer will send updates to all Program Directors.
- 4. Distribution of Reporting Requirements & Expectations:** Reporting requirements and other expectations' will be clearly outlined in the subgrant agreement between ServeNebraska and the operating AmeriCorps program.
- 5. Pre-Service Training:** ServeNebraska will conduct a pre-service orientation and training for Program Directors, Site Supervisors and financial staff. Each AmeriCorps*State program should be represented at this session. Expanded technical assistance will be offered to new programming.

ONGOING MONITORING

1. Programmatic Progress & Financial Reporting

In accord with Corporation for National & Community Service expectations, and applicable law, the following items will be among those reviewed:

- Separate financial reviews to include sampling of source documentation
- Review of examples of sub-grantee source documentation for match submitted to commission
- Verification of member eligibility (*Source: 45 CFR § 2522.200*)
- Verification of member service activities (*Source: 45 CFR § 2520.20, 2520.25, 2520.30 & 2520.40*)
- Assurance that sub-grantees have completed the National Service Criminal History Check process and sub-grantees do not include individuals who are prohibited by regulation or law
- Evidence that prohibited activities are identified for members and not evident in service activities (*Source: 45 CFR § 2520.65*)
- Fund raising not to exceed 10% of contracted service hours per member (*Source: 45 CFR §2520.45*)
- Service-hour records are signed by member and supervisor (*Source: AmeriCorps Special Provision Section IV C.5*)
- Final Total Hours Certified in My AmeriCorps portal or in the prior web-based data system are supported by paper or appropriate electronic documentation (*Source: 45 CFR §2526.70*)
- Member slots are only refilled when prior member did not receive an education award and completed only 30% or less of term of service (online policy FAQs)
- Signed Member contracts containing at a minimum required provisions and the specific amount of the education award to be provided to each member upon successful completion (*Source: AmeriCorps Special Provisions Section IV. D.2 and 45 CFR 2526.50 and §2527.10*).
- Members are required to read and sign a copy of a contract containing grievance procedures
- Member training is 20% or less of aggregate contracted member service hours (*Source: 45 CFR §2520.50*)
- Performance reviews are conducted (*Source: 45 CFR §2522.220(d) & 45 CFR § 2526.15*)
- Support services are provided to members earning a GED, and to those completing their service (*Source: 45 CFR § 2522.100 (k) (1) & (2)*)
- Member enrollment, suspension, change of status, and exit is entered into the appropriate system within 30 days of the event.
- Member living allowance, if charged to the grant as federal or matching funds, is paid on a basis other than hourly. (*Source: 2011 IV AmeriCorps Special Provision F. 1*)
- Tax and insurance requirements are followed including general liability, FICA, income tax, worker's compensation (*Source: 2011 IV AmeriCorps Special Provision F. 3*)
- Sub-grantees provide a health care policy to fulltime members not otherwise covered (*Source: 2011 IV AmeriCorps Special Provision F. 4.*)
- Sub-grantees ensure that childcare is provided to eligible full-time members who need such assistance in order to participate. (*Source: 2011 IV AmeriCorps Special Provision F. 5.& .6*)
- Sub-grantees adhere to the drug-free workplace requirements (*Source: 45 CFR § 2522, Subpart B*) and the *2011 Grant Program Civil Rights and Non-Harassment Policy (Source: 2011 AmeriCorps Grant Provisions Attachment)*

ServeNebraska will utilize consistent reporting and monitoring methodologies with its AmeriCorps sub-grantees to track programmatic progress and financial activity.

Report Deadlines: Programs are required to submit program progress reports and financial reports by deadlines specified in sub-grant agreements. Cumulative progress reports delineating effort towards meeting grant objectives shall be submitted quarterly. In 2012-2013, ServeNebraska will require all programs to submit Program Progress Reports and Periodic Expense Reports in My Service Log, an online platform.

Member Information: All member information (commitments, enrollments, change of status, and exits) are expected to be registered in My AmeriCorps, a system designated by the Corporation for National & Community Service, within 30 days of the event.

Member Hours: Programs must develop and implement systems to track member service, delineating between training, fundraising and service provision. Members should be provided with periodic updates on their progress and the numbers of hours remaining to be served in order to successfully qualify for an educational award. In 2011-2012, ServeNebraska will require all programs to record member hours in My Service Log, an online platform.

Progress Reports: Programs will receive input on the quarterly Program Progress Reports from the ServeNebraska AmeriCorps Program Officer. Input may require corrective action by the program.

Financial Information: The program may receive input from the the Fiscal/Operations Officer about Periodic Expense Reports, match percentage rates or Match Reports. Program payment may be delayed or withheld if:

- Match appears to be insufficient;
- Calculations are incorrect;
- Variations from the original budget total more than 10% of the total grant amount;
- An expenditure appears to be non-allowable and requires investigation;
- Two or more fiscal report due dates are not met; or
- Program close out documents are not received by due date

Program payment WILL be withheld if a program is considered to be in non-compliant status.

SCHEDULED PROGRAM MONITORING PROCEDURES

ON-SITE MONITORING VISITS

On-site visits are comprehensive monitoring efforts focused on compliance. Site visits are a means of assessing program compliance status, gauging the quality of programming and addressing continual improvement issues. On-site visits will be conducted by the ServeNebraska Program and Fiscal/Operations Officers, who may be accompanied by other Commission personnel. It is anticipated that each program will receive multiple monitoring visits in order to more fully assure understanding and compliance with expectations and requirements.

Before the Visit:

- In advance of the agreed on-site visit date, ServeNebraska sends the sub-grantee Program Director and (if applicable) Financial Director pre-visit communication informing him/her of the monitoring visit process. The pre-visit email or letter includes copies of the tools that will be used in the Site Visit.

- The subgrantee AmeriCorps Program Director is to ensure that appropriate program staff and/or members are available for the on-site visit and determines that resources essential to successful implementation of the on-site visit are available.
- ServeNebraska will conduct a pre-visit review of compliance/risk concerns. Communication to-date with the program will be factored into this assessment. Any findings resulting from this pre-visit Assessment will be incorporated into the on-site visit agenda.
- ServeNebraska personnel will gather any relevant documents for the visit.
- Subgrantee Surveying: The Program Officers shall initiate surveying of all Nebraska AmeriCorps*State Program Directors, supervisors, and members. Member responses are kept confidential unless a member raises an issue that needs the immediate attention of the sub-grantee AmeriCorps Program Director (e.g., members are participating in prohibited activities). Results will be shared – in aggregate – with the sub-grantee AmeriCorps Program Director to assure compliance and maximize programmatic functioning.

During the Visit

The site visit may include any of the following components, based on the program's risk assessment:

1. Program Director Interview
 2. Member File Review (100% review for all programs)
 3. Source Documentation Review
 4. Fiscal Director Interview
 5. Fiscal Source Documentation Review
 6. Match Source Documentation Review
- 1) **Program Director Interview:** Conducted by a Program Officer, this interview serves as a follow up on any outstanding issues or compliance citations and provides the program an opportunity to provide information and update ServeNebraska staff.
 - 2) **Member File Review:** All member files of enrolled AmeriCorps members for the program will be reviewed to ensure compliance with grant requirements and to provide constructive input. Member files from the previous year will be reviewed to ensure compliance with end-of-term evaluations and exit requirements. The Program Officer may request hard copies of information from any or all files reviewed.
 - 3) **Source Documentation Review:** At least annually, each sub-grantee AmeriCorps program will be asked to provide source documentation for review that supports the data submitted in Progress Reports.
 - 4) **Financial Director Interview:** Conducted by the Fiscal/Operations Officer, this interview assesses the financial management of the program by examining:
 - Fiscal policies and procedures,
 - a detailed general ledger/expenditure report over a five to six months period,
 - random sample of member and staff payroll with corresponding time sheets,

- random sample of source documentation for expenditures and sub-grantee match contribution;
- appropriate documentation of Workman's Compensation or Occupational Accidental Death Insurance
- appropriate documentation of general liability insurance and
- audit findings in the sub-grantee's audit report will also be discussed during the interview, if appropriate.

- 5) **Fiscal File Sampling:** Conducted by the Fiscal/Operations Officer, this assessment reviews the program's general ledger/expenditure report. Random samples of fiscal transactions from the general ledger/expenditure report are examined to ensure that:
- Grant expenditures correspond directly to a line item in the budget.
 - Transactions adhere to program procurement and cost allocation procedures.
 - Transactions demonstrate segregation of duties within the organization.
 - Receipts or disbursements are clearly attributable to the grant and are allowable costs.
 - Member living allowances claimed for reimbursement are distributed appropriately in equal payments and that personal income tax and FICA are withheld.

After the Visit:

- Within 30 Days of the on-site visit, ServeNebraska shall send a site visit findings letter to the sub-grantee AmeriCorps Program Director. This letter will include a list of compliance issues identified during the visit that require corrective action and risk management issues which may also require corrective action. The compliance letter may contain input from both the Program and Fiscal/Operations Officers.
- The program is expected to respond in writing within four weeks (or 30 days) of receipt of the compliance letter. Written response typically includes the corrective actions the program will take, or has taken to reach compliance.
- Once ServeNebraska has received the program's written response, the Program Officer will ascertain the new compliance status of the program.

DESK AUDITS

Desk audits may be used by ServeNebraska to address emerging concerns, to follow-up on issues identified during the program year, as a monitoring tool for very low-risk programs, or to serve as "spot checks" to ensure that proper program documentation is retained.

Desk Audits will be facilitated by the Program Officers and/or the Fiscal/Operations Officer dependent on the scope and nature of the items to be reviewed. All expectations outlined in policy, procedures, regulations, and provisions and the AmeriCorps contract may be subject to review through a desk audit. These audits may be conducted in a manner deemed appropriate by the Program Officers and/or Fiscal/Operations Officer and may include:

Programmatic Documents

- Member Eligibility
- Member Time Sheets
- Training Plans & Agendas

Financial Systems Review

- Financial Policies and Procedures Manual
- Program Staff Segregation of Duties Checklist
- Employee/Staff Manual
- Cost Allocation Plan & Approval Letter from largest funding source
- Blank and completed Staff Time Sheet
- Copy of the General Ledger/Expenditure Report with account code key
- Match Documentation Procedures/Forms

Fiscal Source Documentation

- Copies of receipts, invoices and/or source documents for expenditures
- Copies of member and staff payroll with corresponding timesheets
- Match documentation and forms

Before the Desk Audit:

In advance of the desk audit, ServeNebraska will send the sub-grantee AmeriCorps Program Director a list of the areas to be sampled (i.e. Member files or fiscal documentation).

The subgrantee AmeriCorps Program Director will ensure that the requested documents are submitted to ServeNebraska by the requested deadline.

During the Desk Audit:

ServeNebraska will review submitted information, request supplemental information as needed, and draft a summary of findings.

After the Desk Audit:

- Within 30 Days of the desk audit, ServeNebraska shall send a summary Desk Audit feedback letter to the subgrantee AmeriCorps Program Director. This letter will include a list of compliance issues identified during the desk audit that require corrective action and risk management issues which may also require corrective action. The compliance letter may contain input from both the Program and Fiscal/Operations Officers.
 - The program is expected to respond in writing within four weeks (or 30 days) of receipt of the compliance letter. Written response typically includes the corrective actions the program will take, or has taken to reach compliance.
 - Once ServeNebraska has received the program's written response, the AmeriCorps Program Officer will ascertain the new compliance status of the program.
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COMPLIANCE STATUS & IMPACT ON PROGRAMS

Official on-site visits, desk audits, informal visits, and ongoing monitoring might reveal areas of non-compliance, areas for improvement, or areas of risk. As a result, the Commission may determine program status to be one of two possibilities: "Non-compliant" or "Compliant."

If a sub-grantee demonstrates non-compliance in relation to AmeriCorps Provisions or does not remedy pending compliance issues or areas of risk* by due dates specified by ServeNebraska, future funding and/or pending requests may be withheld until all issues are adequately addressed. Issues of non-compliance will generally require corrective action by the program within two weeks. Programmatic deficiencies will have a longer timeframe to be addressed; however, if a deficiency is not addressed by the deadline indicated in the on-site visit or desk audit feedback letter, the program will be considered non-compliant.

* “Areas of risk,” although not issues of non-compliance, must be corrected by the program to fulfill the Commission’s | risk-based monitoring strategy, and to ensure full compliance in future reviews. “Areas of risk” can include, but are not limited to:

- Sub-standard member retention rates (below 85%)
- Lack of responsiveness to ServeNebraska staff
- Program staff turnover
- Adequacy and timeliness of reports
- Inability to demonstrate progress towards program objectives
- The severity or chronic nature of deficiencies discussed during the pre-award assessment period, or during on-site visits or desk audits
- Issues discussed during email or phone correspondence with the program – including all items relating to program policies

Any non-compliant program is in a position to lose current funding, to have reimbursements delayed, or to have the program eliminated. All compliance issues will be considered cumulatively as grants are reviewed in the “resubmit” process.

RESOURCES FOR PROGRAMS

To assist programs in efforts to be fully compliant and effective, ServeNebraska offers the following types of assistance:

Pre-Service Training: The Commission will conduct a pre-service orientation and training for sub-grantee AmeriCorps Program Directors, and Site Supervisors. Each AmeriCorps*State & National program must be represented at this orientation and training. Additionally, fiscal directors shall receive an orientation from the Commission’s Fiscal/Operations Officer.

Program Leaders Meetings: To facilitate information sharing, teambuilding, and programmatic excellence; meetings of the AmeriCorps Program Leaders (Program Directors and Coordinators) are held periodically during the course of the program year.

Online Resources: The Commission’s website www.serve.nebraska.gov is structured to be a convenient and readily accessible source of key information and resources. Of particular benefit is the Grantee Central section.

Training Sessions: The Commission provides AmeriCorps State program staff and members with training related to relevant topics. ServeNebraska coordinates training based upon demand, trends and use of a “needs assessment” of AmeriCorps*State & National AmeriCorps programs and other input. Attendance at these trainings is strongly encouraged.

Resources for training and professional development activities are supported largely through Program Development & Training (PDAT) funds allocated by the Corporation for National & Community Service. The Training Officer has primary responsibility for facilitating or arranging relevant activities based on various assessments, including formal needs assessments, training evaluations, input from Commission staff, risk assessments, and direct requests from program staff and members. Programs that wish to request training should contact the Training Officer, Kimberle Hall (402-471-6228 or kim.hall@nebraska.gov).

The Training Officer is responsible for training oversight, including the monitoring of program training plans and following up on any compliance or risk issues noted by Program or Fiscal/Operations Officers that relate to training/development. Areas of risk associated with training include, but are not limited to:

- Insufficient member orientation;
- Inadequate preparation of members to perform assigned duties;
- Lack of “esprit de corps” among operating sites;
- Substandard staff training; and
- Compliance concerns that may have resulted from lack of training

Disability Inclusion: The AmeriCorps/Disability Officer provides technical assistance and administers funds to assist in maximizing the involvement of individuals with disabilities in community and national service. The AmeriCorps/Disability Officer is Cathy Plager (402-471-6226 or cathleen.plager@nebraska.gov).