



## **Nevada AmeriCorps Program Management Guidelines**

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## 1. INTRODUCTION TO PROGRAM MANAGEMENT GUIDELINES

The purpose of these policies and procedures is to provide Nevada Volunteers' staff with the basic operational framework to effectively select, monitor, and support Nevada's AmeriCorps programs. The federal legal and regulatory requirements that fortify AmeriCorps national service are extensive and serve as the basic foundation by which state commissions and AmeriCorps programs must operate. Nevada Volunteers is the Governor's Commission on Service. As such, it is Nevada Volunteers' responsibility to clearly communicate AmeriCorps program requirements and expectations to all sub grantees. These policies and procedures outline the policies, procedures, and technical assistance opportunities used to support quality and effective AmeriCorps programs. Although this document is primarily geared toward Nevada Volunteers' staff, local AmeriCorps program staff will find these procedures to be a valuable resource for understanding the basic expectations and requirements for operating an AmeriCorps program in Nevada.

Nevada Volunteers is a State Service Commission with legal authority to manage AmeriCorps programs. The Corporation for National and Community Service (CNCS) is the AmeriCorps grantor. Nevada Volunteers is the AmeriCorps grantee. AmeriCorps State programs are the AmeriCorps sub grantees. The nature of the relationship between CNCS, Nevada Volunteers and AmeriCorps State sub grantees is defined herein.

## 2. GRANT AND FUNDING INFORMATION

Nevada Volunteers recruits, reviews and selects quality program applicants that reflect the needs and priorities of the state as determined by the Commission and its constituents. In establishing state priorities, Nevada Volunteers consults with its national service partners including the CNCS State Office and the partners of the state service plan. The Commission's decision to seek new applicants is based primarily on the availability of funds from CNCS and the capacity of Nevada Volunteers to effectively monitor and support new AmeriCorps sub grantees. There are various pools of funds available to potential AmeriCorps program applicants beginning with competitive and formula funding. Within each of these pools there are several options for grants that change from year to year including, operational, education award, special initiative, and planning grants. In general these grants can be awarded as either cost-reimbursement or fixed price depending on the organizational/programmatic history. This list offers a basic description of each grant, but the Notice of Funding Opportunity (NOFO) for each grant outlines specific options and restrictions. The grant cycles for each grant type may be held at different times of the year.

### 2.1. Types of Funds

- 1) **Competitive Funds** - Competitive funds are awarded to AmeriCorps applicants who successfully compete at both the state and national levels. The Commission formally recommends selected competitive program proposals to CNCS and CNCS makes the final decision. Congress determines the availability of funds and CNCS establishes priorities annually.
- 2) **Formula Funds** – Formula funds are awarded to AmeriCorps applicants who successfully compete solely at the state level. Nevada Volunteers formally approves programs for formula funding and informs CNCS of its decisions. Fund availability is determined by Congress and allocated to Nevada Volunteers on a formula basis.

## 2.2. Types of Grants

- 1) **Operational Grants** – Operational grants include funds that are awarded to programs to support a portion of both program administration and costs associated with members. These can include costs for staffing, travel, operations, member living allowances, member benefits, and more.
- 2) **Education Award (EAP) Grants** – EAP grants include a small amount of funds to support basic grant administration, but all other costs must be covered by the grantee. EAP grants do not provide funds to cover staffing, travel, operations, and member costs as noted above for operational grants. In general, these grants include the ability to provide members who successfully complete service with a Segal AmeriCorps Education Award, but the funds associated with the awards are managed through the National Service Trust, not the grantee.
- 3) **Planning Grants** – Planning grants include funds to support a program in successfully planning to host a full operational grant. During the period of the planning grant, funds are available to support staffing, travel, training, and other tasks deemed necessary to eventually host AmeriCorps members. These grants do not include funds to pay for member living allowances or other benefits as planning grantees do not host members during the planning period. If awarded, the expectation is that planning grantees will apply for an operational grant during the next award cycle.
- 4) **Special Initiative Grants** – From time to time, CNCS will release special initiative grants that have a specific focus. Often these grants are connected to a specific funding source such as a private foundation or another federal agency. Depending on the initiative these grants can be awarded through the Commission or directly from CNCS.

## 2.3. Grant Reimbursement

- 1) **Cost Reimbursement** – Cost Reimbursement grants fund a portion of program operating costs and member living allowances with flexibility to use all of the funds for allowable costs regardless of whether or not the program recruits and retains all AmeriCorps members. Cost reimbursement grants include a formal matching requirement and require the submission of a budget and financial reports.
- 2) **Fixed Price** – Fixed Price grants provide a fixed amount of funding per Member Service Year (MSY) that is substantially lower than the amount required to operate the program. Organizations use their own or other resources to cover the remaining costs. Programs are not required to submit budgets or financial reports, there is no specific match requirement, and programs are not required to track and maintain documentation of match. Nevada Volunteers only awards fixed price grants to organizations that have a strong track record in managing a cost-reimbursement AmeriCorps grant.

## 3. GRANT APPLICATION REVIEW, SELECTION, AND APPEAL

Nevada Volunteers utilizes a standardized grant review process designed to ensure that only the highest quality proposals in compliance with national service rules, provisions and guidelines are presented to the full Commission to vote on recommendations for funding to be forwarded to CNCS. Nevada Volunteers reserves the right to select and recommend a compendium of programs, both competitive and formula, that best reflect the diversity in program type and geographic representation befitting the State Service Plan and other priority areas identified by the Commission.

**3.1. Grant Application Process Overview** - Nevada Volunteers develops a grant review schedule prior to release of all NOFO's that outlines grant review activities related to each NOFO. The grant review schedule includes submission deadlines for all applicant activities and proposed time frames for staff and review committee functions. The standard grant review process consists of the following steps:

- Preparation of the Notice of Funding Opportunity (NOFO);
- Announcement, posting, and advertisement of the NOFO;
- Technical assistance and training conducted either in-person or via virtual learning;
- Question and Answer period (written questions/answers are posted alongside NOFO);
- Receipt of grant applications;
- Initial staff review for compliance with application instructions;
- Commission Program/Peer Review Committee review and scoring of grant applications;
- Staff program and financial review of grant applications ;
- Grant clarification/negotiation with applicants;
- Recommendation to Commission for approval
- Commission approval of annual AmeriCorps program portfolio
- Submission of approved applications to CNCS
- Award Announcements

Depending on the type of funds and type of grant this process can occur at different times of the year. Some components of the grant review process may be omitted if Nevada Volunteers does not seek new applicants for grant type or if fewer than 2 applications are received.

**3.2. Notice of Funding Opportunity (NOFO)** - When funds are available and as capacity allows, Nevada Volunteers formally notifies the public of AmeriCorps fund availability, which can occur at multiple times throughout the year. This is accomplished through press, and digital media announcements. The NOFO highlights the dates for AmeriCorps application deadlines, dates of technical assistance and introduces the grant application process to interested potential applicants.

**3.3. Training/Technical Assistance** - Nevada Volunteers conducts statewide training and technical assistance for all new and continuing program applicants following the NOFO announcement. The primary purpose of the training and technical assistance is to provide potential applicants with basic information on AmeriCorps/National Service as well as specific information contained in the NOFO including programmatic requirements and grant review criteria. Technical Assistance is provided either in-person or through statewide webinars and all presentation materials are posted online and available to the general public following each technical assistance session. Each NOFO timeline includes a question and answer period during which written questions can be submitted and written answers will be posted alongside the NOFO for interested applicants to review.

**3.4. Initial Staff Review** - Staff conduct an initial assessment of all submitted proposals that primarily checks the application for submission accuracy and basic compliance issues related to the NOFO instructions. Proposals may be disqualified if required portions of the application are missing or incomplete. Staff may also negotiate the proposal with applicants or request immediate revisions to bring applications into compliance before further review and/or scoring is initiated.

- 3.5. Program Review Committee** - Nevada Volunteers utilizes a review process that engages staff, Commission members, and, in some cases, external peer reviewers to evaluate AmeriCorps proposals for both competitive and formula grants. Review groups are normally comprised of 3-6 grant readers who evaluate and score each proposal. Reviewers are selected by staff and/or the Program Review Committee Chair based on having the skills necessary to review the grant proposals. Participants who serve on review committees are required to sign a "Conflict of Interest" form to ensure unbiased evaluation of all proposals. All proposals are scored using a standard rubric that follows the application instructions outlined in each NOFO. Once all proposals have been read and scored, the review committee and staff convenes to discuss results and determine final scores/ranking. The Program Review Committee then makes a recommendation to the full Commission for funding proposals, denying proposals, or developing plans to negotiate with applicants that have potential but may need additional training or resources to be successful. The full Commission votes to finalize the funding decisions and any negotiations that will take place.
- 3.6. Staff Program/Financial Review** - Staff conducts an additional review of all proposals that considers items such as programmatic and budget strengths or weaknesses as well as compliance with additional regulations. For new proposals, staff analyzes the results of the review committee and further scrutinizes the strengths and weaknesses of all proposals. For continuation proposals, staff conducts formal reviews of both past performance and future plans.
- 3.7. Initial Grant Clarification** – Following the staff review, applicants that have been ranked for funding are given an opportunity to provide clarifying information based on questions from the review committee and staff reviews. Each applicants receives a clarification letter with instructions for how to address questions, gaps in information, or possible errors. Part of clarification, can include negotiations for programmatic and/or budget amendments based on available funds and a desire to reflect a diverse portfolio.
- 3.8. Commission Recommendations** - Commissioners review committee/staff recommendations and for all proposals during a quarterly Commission meeting. At this meeting, Commissioners may request additional information from staff and/or applicants. Although Commissioners may recommend a proposal for funding, areas may be identified that must be addressed by the applicant prior to awarding a grant. Commissioners conclude the meeting with formal grant recommendations and/or approval. Based on Commissioner decisions, staff may also prepare an additional clarification letter that requires a response before submitting the final recommendation to CNCS. CNCS deadlines vary depending on the NOFO that applicants apply to.
- 3.9. Negotiations** - For competitive applicants, upon receipt of the Grant Award Review Process (GARP) reports from the Corporation, staff confers with the Program Officer at the Corporation to discuss the results of GARP and clarify any issues, concerns, or non-compliance elements identified in the report. Staff, in turn, conduct negotiations with successful competitive applicants, as well as conduct any required negotiations with formula-based applicants. In some cases, applicants may be required to respond in writing to any issues or concerns identified at either the state or national levels. Performance measures and/or budgets may be modified through this process. Negotiations continue until Nevada Volunteers and the Corporation determine that all non-compliance issues and/or other programmatic or budget concerns have been successfully resolved.

**3.10. Pre-Award Risk Assessments** - Prior to issuing the sub-grant agreement for an award, staff conducts a pre-award risk assessment regarding financial and organizational capacity to effectively administer federal funding with each AmeriCorps applicant. For new applicants this includes a review of the Organizational Readiness Assessment survey that is a requirement for all new programs. Staff may also require copies of relevant documents such as the applicant's most recent audit (or audited financial statements), strategic plan, or other relevant documents. The information contained in the assessment is intended to help staff understand an applicant's agency/organization and evaluate its overall operational capacity and financial controls. Staff reviews all assessments prior to making a grant award and develops a training and technical assistance plan based on the assessment.

**3.11. Sub-Grant Agreement** – The sub-grant agreement is the formal agreement between Nevada Volunteers and all sub-grantees that outlines the expectations and requirements for both parties. This document is sent to the sub-grantee for signature as soon as possible after Nevada Volunteers receives formal award notification CNCS. Within the Sub-grant Agreement all requirements and expectations for AmeriCorps programs are clearly defined for each grant period. Funds are available based on the dates in the sub-grant agreement and after the agreement is executed with signature of both parties. Programs may not start prior to the actual start date of the approved grant period as listed in the sub-grant agreement. If pre-award costs are needed for a grantee to begin preparing to launch their program, a request for approval must be submitted to Nevada Volunteers for approval of these costs.

**3.12. Appeal Process for Grant Applications** - Nevada Volunteers offers an appeal process for AmeriCorps grant applicants whose request for funding has been denied. This process offers dissatisfied grant applicants an avenue to appeal an award decision and assures that the Program Committee's review process and subsequent grant award decisions are accurate, fair and reasonable. Such a process supports applicants' confidence in Nevada Volunteers' policies and procedures for soliciting and awarding AmeriCorps grants.

The Commission endeavors to assure that all grant awards fully reflect sound judgment and compliance with all NOFO terms and conditions and all appropriate AmeriCorps federal, state and state commission regulations. The Commission considers an award appeal for substantive issues of fact concerning bias, discrimination or conflict of interest and/or non-compliance with procedures described in the NOFO document. If the grant applicant has substantive objections to the results of the peer review process, the applicant may request reconsideration. A request for reconsideration must be made by the applicant in writing within 14 business days after formal notice that an application was denied. A letter of appeal must be submitted to the Executive Director of Nevada Volunteers. The letter must:

1. Describe the factor(s) or fact(s) concerning bias, discrimination, conflict of interest or non-compliance that cause the applicant to conclude that the application should have been approved;
2. Outline the specific area(s) in the proposal that applicant believes significantly addresses the NOFO requirements;
3. Identify specific information in the application that the applicant believes Nevada Volunteers overlooked or misinterpreted.

Nevada Volunteers' Executive Director and/or other designated staff person(s) will review the appeal request within 5 business days of its receipt to ensure that it is in compliance with this

policy and merits further review. If the Executive Director or his/her designee(s) determines the appeal letter substantiates that there are material issues concerning bias, discrimination, conflict of interest, or non-compliance with procedures set forth in the NOFO, a Commissioner panel consisting of the Commission's Program Committee, Executive Director, and the Commission Chair will re-review the application.

Nevada Volunteers will respond in writing with the final decision on any outcomes of the appeal review within 14 business days after the decision is made by the Commissioner panel. The Corporation for National and Community Service always has final approval rights for all Nevada Volunteers' competitive grant awards, thus competitive decisions cannot be overturned by Nevada Volunteers.

#### **4. PROGRAM PROGRESS REPORTING**

Nevada Volunteers uses a variety of reporting methods to monitor programmatic developments including quarterly progress reports, the annual Grantee Progress Report, and National Service Trust forms. Copies of all reports and forms are stored digitally through either Nevada Volunteers network drive, the OnCorps System, or CNCS eGrants.

**4.1. Progress Reports** - AmeriCorps programs are required to submit four (4) progress reports to Nevada Volunteers annually. Progress reports monitor a program's progress toward meeting annual performance measure targets, assess program strengths and challenges, highlight unique program achievements and identify opportunities for further training and/or technical assistance. Progress reports are submitted through the OnCorps system and a set of instructions is provided to give guidance for each report that is required in the system and what information is expected for each report. Progress reports are due quarterly on the 15<sup>th</sup> of January, April, July and October. Reports are reviewed by Nevada Volunteers staff who provide feedback to each program within 30 days of submission. This feedback may include requests for additional information to be submitted via OnCorps or email. Quarterly Progress Reports are aggregated into mid-year and final Grant Progress Reports submitted to CNCS through eGrants.

Nevada Volunteers expects all progress reports to be thoughtfully constructed to provide an accurate reflection of the program's accomplishments and challenges for the reporting period. At a minimum, programs must ensure that:

- All reports are completed;
- All questions are accurately answered;
- Challenges are honestly outlined ;
- Measures to address challenges, improve the program, and/or comply with federal rules and provisions are clearly identified;
- Any requested clarifications that are requested through progress report feedback are completed on time in either OnCorps or via email depending on the request.

**4.2. National Service Trust Forms** - The required National Service Trust forms include the member enrollment, exit and change of status forms. All forms must be completed and submitted according to the timeframes identified in the sub grantee agreement and the annual AmeriCorps Terms and Conditions (formerly called Provisions). In general, enrollment forms must be

processed within 30 days of a member's enrollment, exit forms must be processed within 30 days of a member's exit, and change of status forms must be submitted immediately following a member's change in status. Nevada Volunteers monitors the processing of all required Trust Forms through eGrants and during site visits. Nevada Volunteers and the Corporation will use enrollment and end-of-term forms to compile demographic and descriptive data regarding the AmeriCorps member experience, thus programs are now required to use the electronic forms through eGrants in place of the paper forms used in the past.

- 4.3. Slot Conversions** - During the course of a program year, programs may find it necessary to convert awarded or refill AmeriCorps slots from full to part-time positions or vice versa. All slot conversions require prior approval by Nevada Volunteers staff. With any changes, a full explanation must be provided in writing which includes reasons for the requested changes and what the adverse consequences would be if the request were denied. Commission staff will determine if slot conversion is approved or disapproved and provide the program permission to convert slots as necessary.

## **5. PROGRAM FINANCIAL REPORTING**

- 5.1. Periodic Expense Reports and Aggregate Financial Reports** - All AFR's and PER's are available for submission and review through the OnCorps system. Once approved, neither an AFR nor a PER can be changed without a written request to Nevada Volunteers. Nevada Volunteers staff are the only individuals that can unlock an approved AFR or PER for revision in the OnCorps system. Programs are required to upload back-up documentation for each PER through the OnCorps system, including statements of revenue/expenses and balance sheets. Further documentation may be requested for AFR's or PER's as deemed appropriate by staff. Due dates for AFR's and PER's are outlined each year through the sub-grant agreement.

The Periodic Expense Reports (PER) are reviewed in the OnCorps system and approved or rejected by Nevada Volunteers staff. Particular attention is paid to match requirements and comparison of year-to-date expenditures to approved budgets.

Aggregate Financial Reports (AFR's) are reviewed by Nevada Volunteers staff and/or designated consultants and may result in requests for clarification or revision as appropriate. Nevada Volunteers uses these reports to monitor grant expenditures and matching fund requirements. The AFR contains the required information for each program that Nevada Volunteers must submit to CNCS through eGrants and the Health and Human Services (HHS) systems on the Federal Financial Report (FFR). The FFR includes aggregate information for all Nevada Volunteers funded AmeriCorps programs.

- 1) Supporting Documentation** – Programs are required to submit backup documentation with each PER request that can include but is not limited to statements of revenue/expenses and balance sheets. These documents must be uploaded into OnCorps and will be reviewed by Nevada Volunteers prior to approval of the PER and corresponding reimbursement. Nevada Volunteers reserves the right to request additional backup documentation related to a PER if necessary, especially for programs that may be in their first 3-year grant cycle.

**5.2. Budget Modifications** - During the course of a budget year, programs may find it necessary to make changes to approved budget line items. Grantees may make budget revisions without approval if the total change is less than 10% of the entire budget. Budget revisions that exceed 10% of the entire budget require a budget modification request that is initially submitted through OnCorps. If approved, the grantee may be required to complete a grant amendment in eGrants. For any requested budget modifications in OnCorps, a corresponding written explanation must be provided via email, which includes the reason for the change and what the adverse consequences would be if the request were denied. Nevada Volunteers staff determines whether or not additional approval from CNCS is required. If CNCS approval is required, staff drafts CNCS approval request and sends request to CNCS grants officer for review of budget modifications.

1) **Programs must obtain the prior written approval of Nevada Volunteers and the Corporation before making the following budget modifications:**

- Specific Costs Requiring Prior Approval before Incurrence under the OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (also known as the Omni-Circular). For certain cost items, the cost circulars require approval of the awarding agency for the cost to be allowable. Examples of these costs are overtime pay, rearrangement and alteration costs and pre-award costs.
- Entering into sub-grants or contracting out any program activities funded by the grant that have not been specifically identified in the approved application and grant.
- Transferring funds among cost categories, which exceed the total overall budget by more than 10 percent. Administrative cost limits cannot be exceeded.
- Purchasing of equipment over \$1000 using grant funds, unless specified in the approved application and budget.
- Change in or absence of program director or other key agency personnel.

**5.3. Audits** - Programs may be audited and/or reviewed by Nevada Volunteers' staff and/or an independent agency to determine whether financial operations are properly conducted, financial reports are fairly represented, and the program is complying with all applicable laws, regulations and administrative requirements that affect the expenditure of program funds. Nevada Volunteers financial auditing will be conducted according to the site visit procedures outlined in this manual. If applicable, independent auditing will be conducted according to the OMB Omni Circular.

Section 200.501 of the OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards requires all grantees of federal funds who expend \$750,000 or more in a year of federal awards to conduct a Single Audit annually. Qualifying AmeriCorps programs must submit their Single Audit Report to the Commission within nine (9) months of the end of the program fiscal year.

**5.4. Audit Report Procedures**

- 1) Staff receives program audit report, management letter and supporting documents by due date.
- 2) Staff reviews audit report for any identified weaknesses or findings.

- If audit report does not identify weaknesses or findings, staff places a digital copy in the program's grant file on the Nevada Volunteers network drive.
  - If audit report identifies weaknesses or findings, staff sends letter to organization's executive director requesting a written plan for remedial action. Letter also requests follow-up documentation when remedial action is completed. Staff places one copy of letter and report in program's digital grant file.
- 3) Staff documents receipt of written plan for remedial action and places copy in grant file.
  - 4) Staff monitors written plan for appropriate remedial action.

## 6. PROGRAM AND FINANCIAL MONITORING

Nevada Volunteers monitors sub grantees to ensure compliance with all applicable federal, state, and Commission policies and procedures. Monitoring also seeks to evaluate the quality of service activities and the AmeriCorps members' experience. Nevada Volunteers' staff is committed to providing clear expectations, timely guidance, and assisting programs in their continuous improvement. Nevada Volunteers provides programmatic and fiscal oversight to ensure proper stewardship of Federal funds, as outlined by federal rules, provisions, administrative regulations, state law, and Nevada Volunteers policies.

**6.1. Nevada Volunteers Oversight Staff** - The AmeriCorps Program Director is expected to contact the Nevada Volunteers Program Officer with program questions and concerns. On-going communication includes regular contact by phone, e-mail, in person, and by standard mail. Copies of correspondence are maintained in the sub grantee's digital Program' File for each program year.

The Nevada Volunteers Program Officer is responsible for programmatic oversight and ensuring adherence to AmeriCorps Rules, Provisions, federal regulations, state laws, and Commission policies and expectations. To this end, the Program Officer monitors member service documentation, progress towards the grant's performance outcomes, and appropriate use of AmeriCorps funds. The Program Officer also provides technical assistance and mentoring to program staff, and works with programs towards continuous quality improvement and program excellence.

The Nevada Volunteers Executive Director or designated consultant provides technical assistance to program fiscal directors, conducts fiscal site visits/desk audits, monitors program expenditures and match claims through AFR's and PER's, prepares program reimbursements, and facilitates grant closeouts.

**6.2. Risk Assessment** - A Risk Assessment Review Form is completed for all applicants prior to finalizing a grant award. The assessment measures the degree of financial risk that could be incurred by Nevada Volunteers if the agency is funded. For all continuing or re-competing programs the risk assessment takes into account the performance of the program to date. Recurring issues and problems with compliance are included in this report. Nevada Volunteers uses the assessment to determine if it will conduct desk audits, program/financial site visits, staff/member interviews, etc. If a program is rated as low-risk, Nevada Volunteers reserves the right to waive certain program/financial monitoring requirements but must ensure that at a

minimum a complete program/financial site visit occurs at least every three years. In evaluating a program's risk level, the following factors are considered:

- Previous experience as a sub grantee;
- Previous experience in managing federal or state grants ;
- Previous monitoring/compliance issues and how they were resolved;
- Size and/or scope of the grant;
- History of meeting performance measures;
- Previous independent audit findings;
- Program staff tenure/turnover;
- Agency infrastructure and support;
- Prior program and financial site visit reports;
- Adequacy and timeliness of program and financial reports;
- Level of responsiveness to Nevada Volunteers' staff;
- Program Member enrollment and retention rates;
- Participation in teleconferences, meetings and training events.

The numerical assessment of the above risk factors will categorize programs as either High Risk, Medium Risk, or Low Risk.

**6.3. Pre-Award Monitoring and Orientation** - After funding recommendations have been made to CNCS, the Program Officer takes the following actions to ensure that programs are adequately prepared for the grant year prior to the start of the grant year:

- 1) **Application Review for Additional Documents Required** - Each year the NOFO outlines any additional documents that are required for submission to complete the application package. This can include but is not limited to indirect cost rate approval, letters of support, and evaluation plans/reports.
- 2) **Document/OnCorps Review** - The Program Officer analyzes all documents that are vital for successful program administration including certain required information that must be entered into OnCorps as part of the pre-award requirements. Feedback is sent to the Program Director; changes may be required prior to the grant period start date. The document/OnCorps review focuses on proactive member and site monitoring systems, and quantitative data collection systems. These may include, but are not limited to:
  - Member Contract;
  - Performance measures entered into OnCorps for approval;
  - Service Sites entered into OnCorps;
  - Budgets entered into OnCorps for approval;
  - Program Contact Information;
  - Slot Enrollment Worksheet;
  - Host site agreements and/or Memoranda of Understanding with host sites;
  - Member service position descriptions entered into OnCorps for approval.

- 3) **Pre-award Orientation and Training** - Fiscal and programmatic reporting deadlines, site visit requirements and closeout procedures, and other relevant information are communicated to programs before the start of the grant year. Program Directors and other staff may be required to attend an annual training prior to the start of the grant year that provides technical assistance focused on start-up issues and AmeriCorps grant management requirements. This training may be delivered in-person or via webinar depending on timing and resources available for travel.

**6.4. Ongoing Monitoring** – Monitoring throughout the program year can occur through formal and informal mechanisms. To alleviate the burden on programs, formal monitoring is conducted both in-person and via desk audits and is spread out over the course of the year. Each year Nevada Volunteers develops an annual monitoring plan that is distributed to all programs outlining the planned monitoring aspects and timeline. Additional monitoring may occur if Nevada Volunteers determines that this is needed based on risk and monitoring findings. At a minimum monitoring consists of reviews of documentation submitted via eGrants, OnCorps, or email.

- 1) **Monitoring Topics** - Formal program and financial monitoring includes a review of compliance with, at a minimum, the following topics:
  - Program and financial deadlines
  - Participation in required meetings/events
  - Budgeted and regulatory match requirements
  - Enrollment/Retention/Exit requirements
  - Performance Measurement targets
  - Member eligibility requirements
  - Member evaluation requirements
  - Member file/documentation requirements
  - Member service log requirements
  - Criminal History Background check requirements
  - PER reporting and supplemental documentation requirements
  - AFR reporting requirements
- 2) **Site Visits** - Nevada Volunteers staff or designated contractors make, at a minimum, an annual site visit to every program for the purpose of strengthening communication, providing technical assistance, attending recognition events, and monitoring compliance. Formal site visits are scheduled at a mutually agreed upon time. Nevada Volunteers reserves the right to require additional visits as it deems necessary. In this case, the program will be notified in writing why the additional site visits are warranted. The program agrees that Nevada Volunteers has full access at any time and the right to examine, audit, and copy on the program’s premises any directly pertinent records and computer files involving transactions relating to the Sub grant Agreement.
- 3) **Compliance Monitoring** - Compliance monitoring can occur through formal site visits, desk audits, or a combination of these two approaches. Nevada Volunteers conducts a formal compliance monitoring process for both the programmatic and fiscal compliance requirements. These processes can occur simultaneously or separately and include the use of a standardized monitoring tool for each. At minimum, the following records must be

available for the compliance monitoring review either provided in-person or via desk-audit:

- AmeriCorps member files (including documentation of member)
- Documentation of member eligibility
- Documentation of members' time (service logs)
- Documentation of member Pre-Service Orientation
- Documentation of ongoing member training
- Documentation of all performance measurement data
- Documentation of staff time (time sheets)
- Documentation of all equipment, materials, supplies, and travel expenses
- Documentation of in-kind contributions
- Rationale and documentation of any indirect costs
- Any other records which support charges to project funds

**4) Compliance Monitoring Notification** - Program and fiscal staff are notified in writing by Nevada Volunteers staff regarding upcoming compliance monitoring processes no fewer than two weeks in advance of any monitoring activity. Because monitoring can occur in-person, via desk audit, or a combination of the two the written notification will include details of what documentation will be reviewed during each phase of the monitoring process. This means that several notifications may be sent throughout the year for different phases of the compliance monitoring process that are necessary to complete the standardized review tool.

**5) Compliance Monitoring Components** - Based on the program risk assessment, the compliance monitoring will consist of the following components outlined below. Nevada Volunteers may alter a program's risk assessment during the program year if there are changes that would warrant this such as staff turnover. This change will be documented in writing for the program and the compliance monitoring components will be re-aligned with the risk category noted below. Planning Grant monitoring will utilize a different set of components given that many of the items listed below are not applicable for a planning grant.

	LOW	MEDIUM	HIGH
Progress Reports	Quarterly or bi-annually	Quarterly	Quarterly
Aggregate Financial Reports	Quarterly	Quarterly	Quarterly
Pre-Award Document Review	X	X	X
Pre-Award Risk Assessment	X	X	X
Site Visit or Desk Audit: Fiscal Director Interview	As needed	X	X
Site Visit or Desk Audit: Fiscal File Sampling	As needed	1 PER	2 PER
Site Visit or Desk Audit: Program Director Interview	X	X	X
Site Visit or Desk Audit: Member File Sampling minimum	25%	50%	75%
Site Visit or Desk Audit: Member Interviews	As needed	1 Interview	2 Interviews
Site Visit or Desk Audit: Host Site Interviews	As needed	1 Interview	2 Interviews
Site Visit or Desk Audit: Performance Measure Documentation	As needed	1 PM	2 PM
Site Visit or Desk Audit: Fiscal Review	As needed	X	X
Site Visit or Desk Audit: Fiscal File Sampling	As needed	X	X
Individualized Technical Assistance Sessions	As needed	As needed	As needed
Program Closeout Certification	X	X	X

- 6) **Compliance Monitoring Follow-up** - Once the compliance monitoring process has been completed (including all components reviewed during desk audits and site visits) staff sends a detailed site visit summary letter to the Executive Director and AmeriCorps Program Director and/or Fiscal Director. The letter should be sent within 30 days of the completion of the compliance monitoring and includes a list of all compliance issues identified during the visit that require corrective action and risk management issues which may also require attention. The letter may also include general feedback from Nevada Volunteers staff and a request for a written response and corrective action plan within 30 days. Written responses must include the corrective actions the program has taken and any corresponding documentation to demonstrate compliance as instructed. Once Nevada Volunteers receives the program's written response, the Program Officer will log the date it arrived, and ascertain the new compliance status of the program. Confirmation of the program's compliance status, or a request for further information may be sent in writing (e-mail or via letter). A final notification of compliance and closeout notice will be provided to the sub-grantee once all matters have been addressed.

## 7. PROGRAM REIMBURSEMENT

Nevada Volunteers reimburses programs for approved and budgeted expenditures that have already been incurred. Programs are required to submit payment requests to the Commission on at least a quarterly basis but no more than monthly. In some cases, Nevada Volunteers may approve up to one month of advance for start-up funds. Under no circumstances will Nevada Volunteers advance funds or reimburse programs for unauthorized or unallowable expenses.

Payment requests are made through submission of the PER in OnCorps. Once a PER is approved, payments are processed by Nevada Volunteers. Typically, programs can expect to receive payments within two weeks of the regularly scheduled accounts payable run days of the 5<sup>th</sup> or 20<sup>th</sup> of each month. All programs must pay special attention to this timetable to avoid potential cash flow problems. PER's are due by either the 2<sup>nd</sup> or 17<sup>th</sup> of each month for processing on the corresponding accounts payable run noted above. Programs anticipating cash flow problems should contact Nevada Volunteers as soon as possible.

## 8. TECHNICAL ASSISTANCE, POLICY, AND PROGRAM RESOURCES

**8.1. Commission Policies, Grantee Resources, and Correspondence** - Current policies and requirements are distributed to all programs (and discussed during the pre-award orientation) prior to the start of the grant year. This includes policies within the sub-grant agreement as well as attachments that are distributed with the sub-grant agreement including items such as AmeriCorps Terms and Conditions, reporting requirements, and other relevant policies that may vary from year to year. In addition programs have access to the Nevada AmeriCorps Grantee Resource Manual which is updated annually on the Nevada Volunteers website. As policy changes occur, the Program Officer sends updates to all Program Directors via email and provides explanations during required Program Director update webinars that take place every other month.

- 1) **Annual Training Plan** - Annually Nevada Volunteers develops a training calendar for AmeriCorps grantees based on challenges and needs that have been identified by Nevada

Volunteers staff or input provided by grantees. Feedback from grantees is sought through formal and informal surveys and discussions. The training calendar is posted in OnCorps and on the Nevada Volunteers website.

- 2) **Grantee Resource Manual (online)** - Programs have access to the Nevada AmeriCorps Grantee Resource Manual which is updated annually on the Nevada Volunteers website. This manual includes up-to-date policies, best practices, and other relevant resources to assist programs in successfully managing their grants.
- 3) **Policy Updates and Ongoing Communications** - Webinars are offered to Program Directors at a minimum every other month throughout the program year. These communication sessions are used to provide updates on topics such as policies, Nevada Volunteers events, ongoing program/fiscal challenges, CNCS updates, and other relevant topics. The webinars typically include some element of technical assistance applicable to programs as well. In addition to these regularly scheduled meetings, Nevada Volunteers staff is readily available by phone or email to answer questions, offer solutions, and support the grantees as needed. Throughout the grant period, the Program Officer documents calls, meetings and correspondence with programs including communications that require a response from programs. Important telephone conversations are followed up with emails to document conversations and other substantive written communications are archived on the Nevada Volunteers network drive. Issues raised in such correspondence may be considered in future funding decisions, and/or addressed in-depth during site visits. If such correspondence evidences areas of risk or non-compliance, the Program Officer may send an official letter of non-compliance outlining deadlines for the program to complete appropriate corrective actions.

## 9. GRANT CLOSEOUT PROCEDURES

9.1. **Annual Grant Closeout** - Nevada Volunteers requires all sub-grantees to complete the [Closeout Checklist and Certification Form](#) each year within 60 days of the close of the budget period. The Corporation requires complete grant close-outs for all grants that have operated for a three year period and the annual closeout forms from sub-grantees are used to complete this requirement since prime and sub-grants can run on different timelines. The annual closeout process includes completion of the following:

- 1) **Closeout Tasks Checklist** - Includes certification that all members have been exited, progress reports have been completed, and the program is in full compliance.
- 2) **AFR/FFR** - All programs must twice-a-year submit an Aggregate Financial Report (AFR) through the OnCorps system as instructed in the sub-grant agreement. In addition at the end of a 3- year project period, a final Federal Financial Report (FFR) MUST be submitted to Nevada Volunteers and should be cumulative for the entire project period (typically 3-years). The report must also reflect the required percentage of matching funds that the sub-grantee has agreed to contribute under the terms of the grant.
- 3) **Equipment Inventory** - Includes items purchased with Federal grant funds with a current per unit fair market value of \$5,000 or more, or a written statement that there are no such items.
- 4) **Inventory of Unused or Residual Supplies** - Includes items purchased with Federal grant funds which in the aggregate exceed \$5,000, or a written statement that such supplies (if any) do not exceed \$5,000.

- 9.2. Unexpended Funds** - If a program has drawn funds under the grant but not expended them, the program will need to return the funds to Nevada Volunteers.
- 9.3. Copyrighted or Patented Material** - If the agency secured a copyright or patent on any material or device paid for with funds awarded under this grant, the program must provide the Commission with a written confirmation describing the specific nature of the copyright or patent obtained.
- 9.4. Disposition of Equipment** - When original or replacement equipment acquired under a sub grant is no longer needed for the original project or program or for other activities currently or previously supported by a Federal agency, the disposition of the equipment will be made as follows:
- 1) Items of equipment with a current per-unit fair market value of less than \$5,000 may be retained, sold or otherwise disposed of with no further obligation to the awarding agency.
  - 2) Items of equipment with a current per unit fair market value in excess of \$5,000 may be retained or sold and the awarding agency shall have a right to an amount calculated by multiplying the current market value or proceeds from sale by the awarding agency's share of the equipment.
  - 3) In the case where a sub grantee fails to take appropriate disposition actions, the awarding agency may direct the sub grantee to take excess and disposition actions.
- 9.5. Final Notice of Closeout** - After Nevada Volunteers forwards the required documents to the Corporation, staff will advise the program, in writing, that the grant award is closed. The closeout of a grant does not affect:
- 1) The requirement to retain records pursuant to the grant provisions;
  - 2) The requirement and right for audit pursuant to the grant provisions;
  - 3) The right of the Corporation to disallow costs and recover funds on the basis of Single Audit, other audit, or other review; and
  - 4) The obligation of the grantee to return any funds due Nevada Volunteers or the Corporation as a result of later refunds, corrections, cost disallowance or other actions