



**Nevada Volunteers  
Program Director Handbook 2018-2019**



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## Important changes for 2018-2019 program year

- Addition of Data Collection Plan to Pre-Award Requirements on Page 11
- Removal of Service Year as required advertising of program and positions on Page 14
- Significant changes to Progress Reporting Requirements Page 15
- Reduction of number of required number of national service days from three to one on page 16
- Pre-Enrollment added to Member Enrollment and Retention on Page 21
- Changes to reporting requirements to Nevada Volunteers on page 36
- Noncompliance Policy Added on page 38

# **1: Welcome to AmeriCorps and Nevada Volunteers**

Congratulations on being funded as a Nevada AmeriCorps\* State program! Nevada Volunteers, the Governor's Commission on Service, will be working with you to ensure that your AmeriCorps State program is successful. We are here to provide guidance, oversight, and support to help you create a strong AmeriCorps program. Please use this manual as a place to start to understand the many moving parts of national service, your role as a program director, and the importance of understanding federal rules and regulations to ensure that your program is compliant. This manual is provided as a helpful resource to grantees; however, it does not relieve the grantees of their responsibility to operate within the regulations, guidelines, and Terms and Conditions. If there is a conflict between the contents of this manual and the federal guidance referenced above, the federal Terms and Conditions, regulations, etc. are the controlling authority. Still, AmeriCorps Program Directors should familiarize themselves with the information contained within this manual and are responsible for using the manual and related documents to obtain information necessary for the day-to-day operation of their programs.

Nevada Volunteers reserves the right to revise this manual as needed to comply with any applicable regulatory requirements and to incorporate best practices to improve program and financial management. Nevada Volunteers welcomes your input to strengthen the Program Director Handbook.

## **1a. Brief History of AmeriCorps and National Service**

### **AmeriCorps**

AmeriCorps, which is funded by the Corporation for National and Community Service (CNCS), engages more than 80,000 people in intensive service each year through more than 15,000 nonprofits, schools, public agencies, and community and faith-based groups across the country. Members help communities tackle pressing problems while mobilizing millions of volunteers for the organizations they serve. They gain valuable professional, educational, and life benefits, and the experience has a lasting impact on the members and communities they serve. AmeriCorps consists of three main programs: AmeriCorps State and National, whose members serve with national and local nonprofit and community groups; AmeriCorps VISTA, through which members serve full-time fighting poverty and the roots of poverty; and AmeriCorps National Civilian Community Corps (NCCC), a team-based residential program for young adults 18-24 who carry out projects in public safety, the environment, youth development, and disaster relief and preparedness.

### **National Service**

During the Great Depression, President Franklin D. Roosevelt created the Civilian Conservation Corps. Four million young people joined in response to his call to service, restoring the nation's parks, revitalizing the economy, and supporting their families.

During the 1940s, the GI Bill linked wartime service to educational benefits, offering returning World War II veterans the opportunity to pursue higher education in partial compensation for service to their country.

In the 1960s the call to service came from President John F. Kennedy, who challenged Americans in his inaugural address "Ask not what your country can do for you, ask what you can do for your country." In response to this challenge, the Peace Corps was born.

President Lyndon B. Johnson brought the spirit of the Peace Corps home to America by creating Volunteers in Service to America (VISTA) in 1964. VISTA, which is now part of AmeriCorps, continues

to fund programs under the sponsorship of local public agencies or nonprofit organizations to improve the condition of people living in under-served, low-income communities throughout America. Other initiatives such as the Retired and Senior Volunteer Corps (RSVP), the Foster Grandparent Program, and the Senior Companion Program were developed to engage older Americans in the work of improving the nation.

In 1970, Congress created the Youth Conservation Corps (YCC), a summer environmental employment program for youth ages 15-18. YCC no longer exists, but some components remain active in several states. In 1976, California became the first state to create its own youth conservation program, the California Conservation Corps. Now there are Conservation Corps programs in all 50 states and the District of Columbia. Private funders helped create additional youth corps programs during the seventies, including the Youth Volunteer Corps of America, City Year, and YouthBuild.

President George H. W. Bush revived interest in national service. In 1990 Congress passed the National and Community Service Act, which created a Commission on National and Community Service and sought to “renew the ethic of civic responsibility in the United States.” Full implementation began in 1992, when the commission awarded \$64 million in grants to support four broad types of state and local community service efforts.

President Bill Clinton sponsored the National and Community Service Trust Act, a revision of the National and Community Service Act of 1990, which was passed by a bipartisan coalition of Members of Congress and signed into law on September 21, 1993. The legislation created a new federal agency, the Corporation for National and Community Service (CNCS), to administer federally funded national service programs. The law created AmeriCorps, which was designed to support local, state, and national organizations across the nation that involve Americans in results-driven community service.

In his State of the Union address on January 29, 2002, President George W. Bush called on all Americans to serve their country for the equivalent of two years. A coordinating council housed at the White House and chaired by the President worked to expand and strengthen federal service programs like the Peace Corps, Citizen Corps, AmeriCorps, and Senior Corps, and to raise awareness of, and break down barriers, to service opportunities with all federal government agencies.

President Barack Obama also supported national service with the call “United We Serve.” He worked with Congress to pass the Edward M. Kennedy Serve America Act in 2009. In 2013, he created the Task Force for Expanding National Service to engage more Americans in results-driven service; expand economic and educational opportunities for those who serve; enhance federal agencies’ capacity to achieve their missions and more efficiently use tax dollars; and build the pipeline of Americans ready to enter public service. In total, more than \$194 million was invested in this approach resulting in 10,000 new AmeriCorps positions.

## 1b. Laws and Regulations Governing AmeriCorps

### Laws

[National and Community Service Act of 1990](#)

[National and Community Service Trust Act of 1993](#)

[Edward M. Kennedy Serve America Act](#)

[NSCHC Final Rule 2012](#)

## Regulations

[45 CFR](#) Parts 2500 – 2504 Corporation for National and Community Service Chapter XXV

### Terms and Conditions (Provisions)

[AmeriCorps General and Specific Terms and Conditions](#) updated annually

### Grant Agreement

Your AmeriCorps program is also governed by your subgrant agreement issued by Nevada Volunteers. This agreement includes all the special conditions applicable to operating your program; your AmeriCorps proposal (application), and modifications to it that may have been negotiated with you; and the budget for your program, which contains the maximum funds CNCS has provided for your program as well as your obligations to raise matching funds and/or in-kind contributions.

## 1c. Corporation for National and Community Service (CNCS)

Established in 1993, the Corporation for National and Community Service (CNCS) is a federal agency that engages more than 5 million Americans in service through its core programs: Senior Corps and AmeriCorps. As the nation's largest grant-maker for service and volunteering, CNCS plays a critical role in strengthening America's nonprofit sector and addressing our nation's challenges through service. CNCS's Board of Directors and Chief Executive Officer are appointed by the President and confirmed by the Senate. The Chief Executive Officer oversees the agency, which includes about 600 employees operating throughout the United States and its territories.

- [Executive Leadership](#)
- [CNCS State Offices](#)
- [CNCS Strategic Plan](#)

CNCS issues periodic and annual guidance to grantees to help with interpretation of the laws governing AmeriCorps. The following documents will answer many of your questions about grant management and member management.

- [AmeriCorps General and Specific Terms and Conditions](#)
- [CNCS Policy FAQ](#)
- [CNCS Living Allowance FAQ](#)
- [CNCS Branding and Messaging Guidance](#)
- [National Service Criminal History Check FAQ](#)

CNCS has an extensive collection of resources available on their website. You can find information on any topic and sample forms from other commissions. As these forms come from other commissions with other regulations, always make sure they meet Nevada Volunteers' expectations and follow your organizations internal policies and procedures.

- [Managing Grants Resource Page](#)
- [CNCS Knowledge Network](#)

## 1d. Nevada Volunteers

State Service Commissions, such as [Nevada Volunteers](#), oversee the annual grant competition ([NOFO process](#)) award funding to AmeriCorps State and other community service programs, determine social needs in their states, set policy and program priorities, provide training and assistance, support national days of service, and promote service and volunteering. All 50 States, plus the District of

Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands, are represented by a State Service Commission. These, governor appointed, State Service Commissions date back to the creation of the Corporation for National and Community Service with the passage of the National and Community Service Trust Act of 1993. While these State Service Commissions are appointed by the government, not all are state agencies. Nevada Volunteers is a nonprofit organization (501(c)3). State Service Commissions annually manage more than \$250 million in federal national service grants, along with more than \$100 million from local sources, to make citizen service a reality. More than 1,110 private citizens serve as state commissioners nationwide setting priorities for service and volunteerism at the state and local level. At Nevada Volunteers, we use many national service and volunteer acronyms. Here is our [Dictionary of Acronyms](#) to help you become accustomed with the national service language.

## 1e. Types of Grants and NOFO Process Overview

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 subgrantees. There are various pools of funding 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 and programmatic history of the applicant. 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 different.

### Competitive Funds

Competitive funds are awarded to AmeriCorps applicants who successfully compete at the national level. The Commission formally recommends selected AmeriCorps Grant Applications to CNCS for competitive consideration, and CNCS makes the final competitive awards decision. Congress determines the availability of funds, and CNCS establishes priorities annually.

### Formula Funds

Formula funds are awarded to AmeriCorps applicants who successfully compete 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.

### Types of Grants

- 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.
- 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.
- 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 funding cycle.

- 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.

### Grant Reimbursement

There are two types of grant reimbursements: Cost Reimbursement and Fixed Price. Cost Reimbursement grants fund a portion of program operating costs and member living allowances with flexibility to use funds for allowable costs regardless of whether the program recruits and retains all AmeriCorps members or not. Cost reimbursement grants include a formal matching requirement and require the submission of a budget and periodic financial reports.

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 resources to cover the remaining costs. Programs are not required to submit a budget 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 of managing a cost-reimbursement AmeriCorps grant.

### Grant Application Review and Selection

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 programs, both competitive and formula, that best reflect the diversity in program type and geographic representation outlined in the State Service Plan and other priority areas identified by the Commission.

Nevada Volunteers develops a grant review schedule prior to release of a Notices Of Funding Opportunity (NOFO) 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 webinar
- Question and answer period
- 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 depend on the type of funds and type of grants available, as a result 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 the specific grant type or if fewer than two applications are received.

### Appeals Process

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. 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:

- Describe the factors concerning bias, discrimination, conflict of interest or noncompliance that cause the applicant to conclude that the application should have been approved.
- Outline the specific areas in the proposal that applicant believes significantly addresses the NOFO requirements.
- Identify specific information in the application that the applicant believes Nevada Volunteers overlooked or misinterpreted.

Nevada Volunteers' Executive Director and/or other designated staff will review the appeal request within 5 business days of its receipt to ensure that it is compliant with this policy and merits further review. If it is determined that 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.

### Basis for Cost per MSY Policy

It is the policy of Nevada Volunteers to consider applications from individual Nevada AmeriCorps programs that exceed the Corporation's yearly average established for all AmeriCorps programs awarded by Nevada Volunteers. In order to consider cost per MSYs above the average, Nevada Volunteers must first assess its full portfolio of existing programs and the individual cost per MSYs including any programs under the average. This will assist in determining the latitude of Nevada Volunteers to consider programs and number of positions above the average and the degree of costs per MSY above the average. This policy is reviewed annually as Nevada Volunteers prepares its Notice of Funding Opportunity.

### 1f. State Service Plan

As stated in the Serve America Act, each State Service Commission must prepare a national service plan for their state that covers a three-year period, developed through an open and public process that includes measurable goals and outcomes for the state's national service programs and is updated annually. It must also ensure outreach to diverse community-based agencies that serve underrepresented populations; provide for effective coordination of funding applications submitted by

the state; ensure outreach to, and coordination with, municipalities and county governments; and contain information that the State Commission considers to be appropriate.

- [Nevada State Service Plan 2016-2019](#)

*“National Service is an essential part of the solution to many of the challenges facing our state. These AmeriCorps members will meet pressing local needs and strengthen our communities as they develop civic and leadership skills to last a lifetime. I congratulate these outstanding organizations and thank all those who serve their communities through AmeriCorps.”*

*- Nevada Governor Brian Sandoval announcing AmeriCorps grants to Nevada organizations*

## 1g. America’s Service Commissions

The [American Association of State Service Commissions](#) (ASC) is a nonpartisan, nonprofit organization representing and promoting state service commissions across the United States. ASC is a peer network of governor-appointed commissioners and staff of the State Commissions committed to working on national representation and advocacy of national service and volunteerism, and peer-to-peer support. They organize the annual Southwestern Pacific National Training Conference Program Directors attend each year and provide the Member Assistance Program (MAP) that can be made available to members providing them with on-demand counseling services.

## 2: Getting Started

### 2a. Risk and Performance Assessment

Prior to issuing the subgrant agreement for an award, Nevada Volunteers conducts a pre-award [Risk and Performance Assessment](#), to ensure financial and organizational capacity to effectively administer federal funding, for each AmeriCorps grantee. For new grantees, this includes a review of the Organizational Readiness Assessment survey that is a requirement for all new programs. For all continuing or re-competing programs the risk and performance assessment considers the performance of the program to date. Recurring issues and problems with compliance are included in this report.

Nevada Volunteers uses the Risk and Performance Assessment to determine if it will conduct desk audits; program and financial site visits; and staff, host site supervisor and member interviews. If a program is rated as low-risk, Nevada Volunteers reserves the right to waive certain program and financial monitoring requirements but must ensure that at a minimum a complete program and financial site visit occurs at least every three years. In evaluating a program’s risk level, the following factors are considered:

- Member Enrollment
- Program Management Practices
- 30-day enrollment and exit compliance
- NSCHC compliance
- Prohibited activities
- Member timesheets
- Member change of status documentation
- Days of Service
- Quality of member experience
- Participation in key trainings
- Program Monitoring Site Visit
- Operational management
- Program Experience/Knowledge

- High quality results
- Financial reporting
- Program’s ability to meet matching requirements
- Financial Site Visit

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

## 2b. Subgrant Agreements and Pre-Award Requirements

Your Subgrant Agreement is the formal agreement between Nevada Volunteers and your organization that outlines the expectations and requirements for both parties. It provides you with a thorough list of your financial, reporting, and programmatic requirements as a grantee. It is essential that you have read and understood this document and worked with your financial program representative to ensure that all compliance requirements are met. Funds are available based on the dates in the subgrant agreement and after the agreement is executed with signatures of both parties. Programs may not start prior to the actual start date of the approved grant period as listed in the subgrant agreement. If pre-award costs are needed for a grantee to begin preparing to launch their program, a request for approval must be submitted in writing to Nevada Volunteers for approval of these costs prior to incurring such costs.

After funding recommendations have been made to CNCS, Nevada Volunteers works closely with subgrantees to ensure that all pre-award requirements are completed prior to your grant start date. The pre-award grant phase is an interactive process in which subgrantees develop and submit key grant documents which are reviewed and approved, where required, by Nevada Volunteers. Some pre-award grant deliverables may need to be entered into the OnCorps system as noted below. Nevada Volunteers typically updates this process each year to incorporate any new grant requirements and best practices. Pre-award grant requirements, at a minimum include:

- Member Service Agreement/ Contract
- [Host Site Agreement](#)
- [Key Concepts of Grants and Financial Management](#)
- [Member Position Descriptions](#)
- [NSCHC On-line Training](#)
- Program Contact Information
- Member Timesheets created in the OnCorps system
- Service Sites entered into the OnCorps system
- Grant Budget entered into the OnCorps system
- Performance Measures entered in the OnCorps system
- [Data Collection Plan](#)
- Organizational Chart
- Start-up Institute attendance
- [Slot Enrollment Worksheet](#)

## 2c. New Program Director Resources

Nevada Volunteers provides an orientation for new program directors to provide them with training on program and grant management and give them an opportunity to share best practices. This training may be provided at the Start-Up Institute with a group of new program directors, or may be provided

individually if a program director starts mid-year. Nevada Volunteers also provide resources to help you understand your new role.

- [Program Director Core-Competencies](#)
- [Checklist for new AmeriCorps Program Staff](#)

## 2d. Program Start-Up Resources

CNCS provides resources to help with program design. We recommend reviewing these documents to help you think about building a high-quality AmeriCorps program.

- [CNCS New Program Start-Up Guide](#)
- [CNCS Learning Pathways for Program Start-Up](#)

## 2e. Performance Measures

[Performance Measures](#) (PMs) (45 CFR 2422.530-45 and CRF 2522.650) are used to report AmeriCorps achievements during the program year. During the grant application and contract approval process, the program develops, and Nevada Volunteers and CNCS approve, national performance measures and/or program-identified performance measures to be reported to CNCS. You will report quarterly on your progress in OnCorps. Performance Measures must be entered correctly in OnCorps or reports pulled by Nevada Volunteers for reporting to CNCS are incorrect. Please make sure to enter the Performance Measure data according to the tutorial in OnCorps under the help menu ribbon. It is essential that data reported to Nevada Volunteers and CNCS be of high quality and we encourage you to take the [CNCS Data Quality Self-Assessment](#).

## 2f. eGrants and OnCorps

### eGrants

[eGrants](#) is the grants management system used by CNCS. It is also called the My AmeriCorps Portal when used by members. Grant proposal and amendments are submitted in eGrants. [Member Assignment Listings](#) must be entered in eGrants for all member positions. Members must be enrolled and exited through eGrants within 30 days. CNCS has developed a comprehensive [eGrants FAQ](#). Here is a tutorial on [Entering Service Locations](#) and [Enrolling, Exiting and Suspending Members](#). Issues with eGrants should be directed to the [help desk](#).

### OnCorps

[OnCorps](#) is the online software used by Nevada Volunteers for grant reporting, member [timesheet](#) tracking, and data collection. It is Nevada Volunteers' system of record management and all [Member Position Descriptions](#), financial and programmatic reporting and time keeping should be stored in this system. Nevada Volunteers will provide you with a username and password to access this OnCorps. To request an OnCorps account for a staff member please email your Nevada Volunteers Program contact with the staff member's name, title, contact information including address, email address, and phone number. Also include if the staff member needs programmatic and/or financial access.

OnCorps has many great tutorials under the help tab in the top ribbon once you have logged-in including:

- [Member Position Descriptions](#)
- [Budget and Financial Tutorial](#)

## 2g. Host Site Recruitment

Programs that utilize host sites for placement of AmeriCorps members are expected to monitor host sites for compliance and to ensure a high-quality member experience. Effective host site management policies can include written site agreements in which both parties attest to their roles and responsibilities in the partnership. Agreement should cover the responsibilities of the site supervisor

related to member oversight; evaluation and training; the member activities that are prohibited; the disciplinary procedures and the role of the supervisor in member discipline and termination; and financial and performance obligations on the part of the site, including when and under what circumstances these obligations would terminate or be reduced. These agreements should be reviewed and reissued on at least an annual basis and revised as needed. Depending on the scope and nature of the project, additional items may be covered in the written site agreement. Here is a [sample Host Site Agreement](#) for your reference.

AmeriCorps programs are encouraged to utilize a written site selection process (45 CFR 2522.450-.475) for continuous improvement and to maximize the mutually beneficial relationship between the organization and its sites. Programs must ensure that the site selection plan incorporates the criteria required by regulations (quality, innovation, sustainability, quality of leadership, past performance and community involvement).

## 2h. Member Recruitment and Member Positions Descriptions

As an AmeriCorps program, you must ensure a fair and equitable recruitment process (45 CFR 2522.210). This process should actively seek to recruit a diverse corps and include a plan to recruit locally. Programs cannot violate the nondiscrimination and non-displacement rules governing participant selection. Nationally, recruitment must be conducted through eGrants/My AmeriCorps Portal. Before a program can recruit for a position, the Member Position Description must be uploaded into OnCorps and approved by Nevada Volunteers and the Member Assignment Listing must be approved by CNCS in eGrants. CNCS has resources on their website to assist with [member recruitment](#). In addition to these requirements, member positions descriptions can be listed anywhere your organization would typically post a position such as with colleges and universities, local job boards, groups affiliated with your mission such as conservation job boards, [Idealist.org](#), and [handshake](#).

As an AmeriCorps program, you must also ensure an equitable member selection process. You must have completed and signed member applications; have a uniform selection documentation; guarantee members are chosen based on essential functions listed in position descriptions; and assess a member's ability to complete the essential functions of the position with or without reasonable accommodation.

## 2i. Member Eligibility

To be eligible to enroll in AmeriCorps, individuals must meet the following requirements: Be a United States citizen, U.S. national, or a lawful permanent resident alien of the United States; Be at least 17 years of age; and Have a high school diploma or GED or work towards obtaining one while in the program (45 CFR 2522.220, Policy FAQ Part B). It is a requirement to obtain a high school diploma or GED before one is eligible to use the Education Award. Member eligibility must be confirmed and documented in the member file.

## 2j. AmeriCorps Program Identification

As a program that is part of the AmeriCorps National Service Network, AmeriCorps Program identification must comply with the [AmeriCorps Branding and Messaging Guidance](#) issued by CNCS and the AmeriCorps Logo requirements in the AmeriCorps Grants Terms and Conditions (45 CFR 2522.100). Programs must provide each of their AmeriCorps members with a basic AmeriCorps service gear package of the program's choosing, because it is required that members always wear some type of AmeriCorps identification during their service hours. Programs may design and provide program-specific member gear and include this in the program's budget. An item with the AmeriCorps logo is a required budget expense. AmeriCorps service sites are required to be clearly identified as AmeriCorps service sites with the appropriate AmeriCorps signs, including, at a minimum, the AmeriCorps logo.

## 2k. Disability Inclusion

Upon request, programs are required to provide reasonable accommodations for qualified candidates and members with disabilities (Terms and Conditions and 45 CFR 2522.100). Qualified candidates and members may request an accommodation at any time during their consideration and/or term of service. Programs need to be proactive to ensure that everyone, including individuals with disabilities, have the opportunity to serve as an AmeriCorps Member. There is funding available through CNCS to support members with reasonable accommodations. For more information regarding requests for accommodations, please contact your Nevada Volunteers program contact. There are many resources available to help ensure that your program is inclusive:

- [Creating an Inclusive Environment](#)
- [Disability Inclusion Resource Guide](#)
- [Glossary of Disability and National Service Terms](#)
- [Effective Practice Guide](#)

## 3: Program Management

### 3a. Host Site Monitoring

AmeriCorps programs must have and implement a plan for oversight and monitoring to ensure that each subrecipient and/or service site has agreed to comply, and is complying, with award requirements. (See the [Terms and Conditions](#))

### 3b. Progress Reporting

AmeriCorps programs are required to submit either four quarterly progress reports (for new and high-risk programs) or two biannual progress reports (for low or mid-risk programs) to Nevada Volunteers annually. Please download your reporting requirements sheet here:

- [Reporting Requirements for New and High-Risk Programs](#)
- [Reporting Requirements for Low and Mid-Risk Programs](#)

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 technical assistance. Nevada Volunteers uses this information not only to report to CNCS, but also to the Commissioners, our communities and government leaders. 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. 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 in OnCorps or by 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 source documents for performance measures are valid and reliable
- All questions are accurately answered
- Challenges are honestly outlined
- Measures to address challenges, improve the program, and comply with federal rules and provisions are clearly identified

- Any clarifications that are requested through progress report feedback are completed on time in either OnCorps or by email

Progress Reports are due to Nevada Volunteers quarterly or biannually according to the forms above on the following dates.

### 3c. Program Evaluation

The first time a program re-competes at the competitive or formula level, after its first three-year cycle, an evaluation plan must be submitted with the grant application. After a second three-year grant cycle, a program re-competing would need to submit a completed evaluation with the grant application (45 CFR 2522.500-540 and 45 CFR 2522.700-810). CNCS has prepared the following resources on the evaluation process:

- [Evaluation FAQs](#)
- [Evaluation Resources](#)

### 3d. National Days of Service

Programs must plan and implement at least one special community service projects. It must coincide with another approved National Service day unless prior written permission is provided by Nevada Volunteers. These media-worthy events should have significant impact on one of the AmeriCorps service focus areas and meet a local community need. Members are encouraged to recruit, train and supervise a substantial number of community volunteers to implement the projects. Notify your Nevada Volunteers contact about these events in advance so that we can share these events with our network. Programs are encouraged to collaborate regionally with other AmeriCorps or CNCS programs (e.g. Senior Corps, VISTA). National Service Days include the following: [September 11 National Day of Service and Remembrance](#), [Martin Luther King, Jr. Holiday](#), [National Volunteer Week](#), and [AmeriCorps Week](#).

### 3e. Documentation and Records Retention

AmeriCorps programs are required by accepting federal funds to carefully document the “who, what, when, where how and why” of the AmeriCorps grant to show that:

- Service activities in the scope of the grant occur
- Member training is planned and delivered
- Volunteers are recruited, trained and supervised by members
- All data is appropriately collected, organized, aggregated and stored
- Data is valid and reliable
- Performance measurement targets are accurate and realistic
- Source documents for Performance Measures are valid and reliable
- Members are appropriately supervised
- Program complies with AmeriCorps Terms and Conditions
- Program plans and implement National Days of Service projects
- Program complies with Subgrant Agreement
- Program has policies and procedures which are consistently followed
- Data reported matches the data in the program’s files

Programmatic and financial records for AmeriCorps programs must be retained for three years beyond the date of final closeout of the Nevada Volunteers Prime application under which programs were funded (45 CFR 2541.420). If you are unsure about how long records should be retained, please contact your Nevada Volunteers contact.



### 3f. Required Nevada Volunteers Training

Nevada Volunteers provides training to staff and members of AmeriCorps programs. Staff and members are encouraged to take advantage of these opportunities to strengthen their program and make continuous improvements. A schedule of training events will be provided to the AmeriCorps Programs as far in advance as possible. For required program director trainings, each program *must* be represented by the program director or appropriate representative. There is a monthly, required, conference call for all program directors and at the beginning of each grant year, Nevada Volunteers provides a mandatory two-day Start-Up Institute to review program requirements and changes to regulations for the program year.

### 3g. Required ASC Regional Training

Nevada Volunteers requires that program directors attend the annual ASC Southwestern Pacific National Training Conference. Programs are required to include travel and conference fees in their budget. This conference is a great opportunity to connect with other program directors and stay up to date with changing national service regulations and trends.

### 3h. No-Cost Extension

No individual member contract may exceed 12 months. All members (including FT, HT, RHT, QT, and MT) must complete their terms of service within 12 months from the program start date. With approval from Nevada Volunteers, programs with members who have been suspended or started late in the grant year may receive a no-cost extension. No-cost extension requests should be made as soon as possible but no later than 30 days prior to the end date of the grant contract. Please complete the [No-Cost Extension Form](#) and submit by email to your Nevada Volunteers Program Contact.

## 4: Member Management

### 4a. National Service Criminal History Checks, NSCHC

Programs must conduct and document a compliant NSCHC (45 CFR 2540.200-.207, [NSCHC Final Rule](#), [Background Check FAQ](#)) before any member or staff funded by the AmeriCorps grant begins service. Each AmeriCorps program should develop a written policy about how criminal history checks will be handled at their agency, including the timeframe in which checks will be conducted. Nevada Volunteers can provide technical assistance to help develop and evaluate this policy. CNCS has many additional resources on their [NSCHC Resources Page](#).

A compliant check includes the following actions and maintaining documentation of described action:

- Verification of identity through government-issued photo identification.
- Obtaining written consent from candidates to perform checks.
- Documentation of candidate's understanding that his or her position is contingent on eligibility determined by the results of the NSCHC.
- Perform a free, nationwide National Sex Offender Public Registry check (NSOPR/NSOPW) before each candidate begins work or service. Records verifying this check must include an electronic date stamp and document any hits which are not a match.
- Determine if the position will have access to vulnerable populations and, if so, initiate and pay for a Resident State, Service State, and FBI checks based on that determination before candidate begins work or service.
- Document initiation of all required checks to include dates of initiation.

- Provide and document accompaniment for members with recurring access to vulnerable populations while background checks are pending when service or work involves vulnerable populations.
- Document receipt date when background check results arrive.
- Document that background check results were considered.
- Document the approval to cease accompaniment once a candidate has been cleared by either the state checks or the FBI check.
- Provide the member an opportunity to review findings, being mindful of Civil Rights laws and particularly when negative results surface.
- Maintain records and documentation of background check results, while maintaining confidentiality, for a period of three years after the expiration of the grant.

CNCS takes the NSCHC seriously and there are significant financial ramifications for noncompliance. Please review the [Enforcement Guide](#) to ensure you understand the implications of noncompliance.

CNCS policies explicitly exclude prospective members/staff from service/work for the following reasons. If the prospective member/staff:

- Is registered, or required to be registered, on a sex offender registry
- Has been convicted of murder, as defined in section 1111 of title 18, United States Code
- Refuses to consent to the National Service Criminal History Check, or
- Makes a false statement in connection with a grantee's inquiry concerning the individual's criminal history

In all other cases, it is the responsibility of the programs to establish guidelines, other disqualifying offenses, and restrictions for consideration of criminal findings that fit with their program design.

Members who serve consecutive terms in a single program with a break of less than 120 days between terms do not require another criminal history check for the additional term. However, if the member will have recurring access to vulnerable populations during his/her consecutive term and did not receive all components for individuals with recurring access to vulnerable populations during the previous term, he/she is required to receive a heightened criminal history check prior to the consecutive term, regardless of the amount of time between terms. A program enrolling a member who has served previously with another AmeriCorps program must complete its own national service criminal history check on the member.

## 4b. Prohibited Activities

The Corporation has placed a strong emphasis on monitoring for prohibited activities (Terms and Conditions and 45 CFR 2520.65). All programs should make note of the prohibited activities and ensure that members, site supervisors, and other staff are well-versed in the prohibited activities. It is required that prohibited activities are covered in the Member and Site Supervisor Orientation, as well as specifically detailed in the member contract. These prohibited activities include:

- i. Attempting to influence legislation;
- ii. Organizing or engaging in protests, petitions, boycotts, or strikes;
- iii. Assisting, promoting, or deterring union organizing;
- iv. Impairing existing contracts for services or collective bargaining agreements;
- v. Engaging in partisan political activities, or other activities designed to influence the outcome of an election to any public office;
- vi. Participating in, or endorsing, events or activities that are likely to include advocacy for or against political parties, political platforms, political candidates, proposed legislation, or

- elected officials;
- vii. Engaging in religious instruction, conducting worship services, providing instruction as part of a program that includes mandatory religious instruction or worship, constructing or operating facilities devoted to religious instruction or worship, maintaining facilities primarily or inherently devoted to religious instruction or worship, or engaging in any form of religious proselytization;
- viii. Providing a direct benefit to –
  - a) a business organized for profit;
  - b) a labor union;
  - c) a partisan political organization;
  - d) a nonprofit organization that fails to comply with the restrictions contained in section 501(c)(3) of the Internal Revenue Code of 1986 except that nothing in this section shall be construed to prevent participants from engaging in advocacy activities undertaken at their own initiative; and
  - e) an organization engaged in the religious activities described in paragraph vii of this section, unless Corporation assistance is not used to support those religious activities;
- ix. Conducting a voter registration drive or using Corporation funds to conduct a voter registration drive;
- x. Providing abortion services or referrals for receipt of such services; and
- xi. Such other activities as the Corporation may prohibit (see Additional Prohibited Activities)

Other prohibited activities (45 CFR 2520.40) include:

- i. Members raising funds for their living allowance
- ii. Raising funds for program operating expenses or endowment
- iii. Writing grant applications for CNCS grants, including AmeriCorps
- iv. Writing grant applications for funding provided by other federal agencies
- v. Recruiting volunteers to perform prohibited activities or distributing materials related to prohibited activities (i.e. activities in support of the Prohibited Activities are not allowed. For example, it is not allowable for an AmeriCorps member to recruit community volunteers to perform a prohibited activity, such as voter registration drives, nor is it allowable for an AmeriCorps member to distribute materials related to a prohibited activity, such as registration information for religious instruction.)

Information on needle exchange program:

Referrals to needle exchange are allowable so long as CNCS is not funding the needle exchange operations. Referrals to needle exchange is a more risky area that is likely to put members in closer proximity to other prohibited activities and will require increased mitigation/monitoring. The federal appropriation bill for 2017 currently regulates these program.

SEC. 520. Notwithstanding any other provision of this Act, no funds appropriated in this Act shall be used to purchase sterile needles or syringes for the hypodermic injection of any illegal drug: *Provided*, that such limitation does not apply to the use of funds for elements of a program other than making such purchases if

the relevant State or local health department, in consultation with the Centers for Disease Control and Prevention, determines that the State or local jurisdiction, as applicable, is experiencing, or is at risk for, a significant increase in hepatitis infections or an HIV outbreak due to injection drug use, and such program is operating in accordance with State and local law.

SEC. 807. None of the Federal funds contained in this Act may be used to distribute any needle or syringe for the purpose of preventing the spread of blood borne pathogens in any location that has been determined by the local public health or local law enforcement authorities to be inappropriate for such distribution.

#### 4c. Member Service Agreements (Member Contracts)

As described in the AmeriCorps Terms and Conditions, programs are required to have members sign a member service agreement, or contract, that, at a minimum, stipulates the following:

- Member position description
- The minimum number of service hours and other requirements 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 grantee or subgrantee
- List of prohibited activities
- Requirements under the Drug-Free Workplace Act (41 U.S.C. 701 et seq.)
- Suspension and termination rules
- The specific circumstances under which a member may be released for cause
- Internal Grievance Procedure (note that the Member Service Agreement must include the Internal Grievance Procedure developed by the subgrantee and approved by Nevada Volunteers)
- Other requirements as established by the grantee

Programs should ensure that the service agreement is signed before commencement of service so that members are fully aware of their rights and responsibilities. Nevada Volunteers has a [Member Service Agreement Template](#) for your use.

#### 4d. Member Files

Member File should follow Nevada Volunteers [Member File Checklist](#). Member files must have good documentation that collects, synthesizes or codes printed information for future reference. Documentation supplies supporting evidence and confirms that a fact or statement is true.

##### Why Document?

- Quality record keeping is an integral part of effective grant management.
- Documentation provides authentic accountability for the service activities and program outcomes of the AmeriCorps grant.
- It's a requirement of accepting federal funds and is subject to federal audit.
- Documentation that is timely, accurate, and professional, establishes a reliable record of what happened, and can provide proof of compliance.
- Good records establish a paper trail that others can follow to understand why you did what you did and when it was done.
- Documentation helps assure that agency policies and procedures are consistently applied, regardless of funding source; consistently followed; and maintained in writing.

- Careful documentation justifies human resource decisions that can have legal and financial implications.
- AmeriCorps program directors are certifying officials for proof of member eligibility, and assuring that members fulfill all requirements for an education award.

Good documentation is completed in a timely, and professional manner; and contains all the relevant information.

- It is specific, written out, and well labeled.
- It includes auditing of your own records issuing up to date and accurate checklists.
- Meeting or training documentation includes complete agendas and sign-in sheets.
- It retains and updates records to assure accuracy, relevancy, timelines, and completeness.
- Written documentation must be in ink not pencil. All errors must be marked as such and initialed by the person making the correction. No erasures. No cross-outs without initials. No white out.
- It includes the who, what, why when, where, and result or outcome.

AmeriCorps member files must maintain a complete record of service that shows:

- Members are appropriately interviewed and hired
- Eligibility criteria are in file
- Members are correctly enrolled in national service
- Background check results are in file
- Members have a national service contract
- Supervision happens
- Performance is evaluated mid-term and end of service, including end of service performance evaluations for members who exit early
- Members are appropriately terminated
- Members are correctly exited from national service
- If the member is eligible for an education award
- Members performed national service tied to the grant
- Member issues should be documented in writing, including dates and times of conversations, incidents, etc.

#### 4e. Breaches of Personally Identifiable Information

Subgrantees need to be prepared for potential breaches of Personally Identifiable Information, PII. OMB defines PII as any information about an individual, including but not limited to, education, financial transactions, medical history, and criminal or employment history which can be used to distinguish or trace an individual's identity, such as their name Social Security Number, date and place of birth, mother's maiden name, biometric records, etc., including any other personal information which is linked or linkable to an individual. All subgrantees must ensure that they have procedures in place to prepare for and respond to breaches of PII, and notify the CNCS in the event of a breach. Subgrantees must establish procedures to prepare for and respond to a potential breach of PII, including notice of breach to Nevada Volunteers and to CNCS. Subgrantees should immediately notify CNCS' Office of Information Technology, your Nevada Volunteers Program Contact, and CNCS' Office of Inspector General. Here is a [sample PII Policy](#) for your use.

#### 4f. Member Pre-Enrollment, Enrollment and Retention

Before applicants can be enrolled as members in an AmeriCorps program they must be pre-enrolled. Programs must invite applicants in eGrants/MyAmeriCorps Portal and the applicant must accept and complete the Enrollment Form. Once the applicant has completed the Enrollment Form and submitted it, the Social Security Administration verifies that the applicant is eligible to serve within 3 business

days. During this time the program initiation the NSCHC including the NSOPW and FBI/State checks. Once the SSA has verified that the member is eligible, the program can complete the enrollment form and the member can start service. Please see the [Pre-Enrollment Flowchart](#) for a step-by-step overview of this process.

To enroll members in eGrants, please refer to the [tutorials on the Knowledge Network](#), particularly the [Member Enrollment PowerPoint](#) at the bottom of the page, for step-by-step instructions for this process in eGrants. Programs must document in the eGrants/My AmeriCorps Portal a member's enrollment within 5 days of the start of service date and within 30 days of the end of service date. To determine compliance with the enrollment and exit requirements, use the Enrollment Approval Cycle Time Report and Exit Approval Cycle Time Reports, which are available from the Reports menu in the eGrants Portal. Please note, due to a discrepancy in time keeping, 6 days and 31 one days is considered acceptable on the eGrants reports.

#### 4g. Member Orientation

Programs must conduct a [member orientation](#) (45 CFR 2522.100 and National Policy FAQs) designed to enhance member sensitivity to the community and comply with any pre-service orientation or training required by the Corporation. At a minimum, these items should be covered during orientation and explicitly listed on the member orientation agenda:

- Member rights and responsibilities, including the Program's code of conduct
- Prohibited activities (including those specified in the regulations)
- Requirements under the Drug-Free Workplace Act (41 U.S.C. 701 *et seq.* & 2 CFR 182)
- Suspension and termination from service
- Member contracts
- Grievance procedures
- Sexual harassment, other non-discrimination issues, and other topics as necessary
- National Service
- Host site/service partners if applicable
- Communities where the members will serve

#### 4h. Accompaniment

Programs are responsible for ensuring that an individual (service member or staff member), for whom the results of the statewide and FBI criminal registry checks are initiated and pending completion, is not permitted to have access to vulnerable populations (children age 17 and younger, persons age 60 and older, or individuals with disabilities) without being accompanied by either an authorized program representative who has previously been cleared for such access; a family member or legal guardian of the individual; or an individual authorized by the nature of his/her profession to have recurring access to the vulnerable individuals, such as an education or medical professional. Accompanied means that the member must be in the direct line of site of the person supervising them. Accompaniment may cease when both the FBI and state checks have cleared. Please keep in mind that in-state and state of residence at time of application checks are required. Each instance of accompaniment must be documented, including the date, time, location, and name of person who provided accompaniment on the member timesheet in OnCorps. Regardless of supervision, programs shall ensure that no member or employee serve hours prior to completion of the National Sex Offender Public Website (NSOPR), and initiation of the FBI and state checks.

#### 4i. Member Status

If you need to suspend or exit a member early, please notify your AmeriCorps Program contact before changing the member status. If your program suspends or exits a member early, whether for cause or for compelling personal circumstances, the reason for the suspension or exit must be documented in the member file. Regardless of the sensitivity of the issue, programs are required to maintain acceptable supporting documentation of this information in the member files, or separate medical file, which should be secured and confidential. Nevada Volunteers has created a [Member Change of Status Form](#) for your use to help ensure all step of member status changes are documented. This form should be placed in the member's file while whenever a member changes status. For information on changing a member's status in eGrants, see the [tutorials on the Knowledge Network](#). For members who are serving in the Armed Services Reserves please review this [policy](#) on member status while serving.

#### 4j. Changing Member Terms of Service and Refilling Slots

Requests for changing member term of service (filled or unfilled AmeriCorps positions) must occur through your AmeriCorps Program contact. Please contact them immediately if you believe you will need to change the term of service for a position. Programs may not change a member's term of service without prior authorization from Nevada Volunteers.

The following conditions, established by the Corporation, must be adhered to by all AmeriCorps programs regarding refilling of member positions (National Policy FAQ part D):

- Programs may replace any member who terminates service before completing 30% of his/her term provided that the member who terminates is not eligible for, and does not receive, a pro-rated education award.
- Only fully enrolled member service categories may be refilled. For example, you may only refill a full-time position if all of your other full-time positions are filled.
- Programs may not refill the same position more than once.

#### 4k. Education Award Eligibility

Members who successfully complete their terms of service are eligible for an education award; members who exit early for compelling personal circumstances may be eligible for a pro-rated education award if they complete at least 15% of their term of service (45 CFR 2526 and National Policy FAQ parts B and C). The amount of the Segal AmeriCorps Education Award is tied to the maximum amount of the U.S. Department of Education's Pell Grant. Since the maximum amount of Pell Grants can change from year to year, so can the dollar amounts of education awards. Programs should check the NOFO/RFP that applied to that program year for corresponding education award amounts. More information about the Segal AmeriCorps Education Award can be found at <http://www.nationalservice.gov/programs/americorps/segal-ameri-corps-education-award>.

Members may not receive more than an amount equal to the aggregate value of two full-time education awards. The value of an education award received is calculated based on its proportion to the full education award in the year the award was approved. An individual who, based upon the aggregate value of education awards previously received, is not eligible to receive the entire award amount offered for a term of service, will instead receive the portion of the education award that he or she is eligible to receive.

Individuals who have received a transferred education award must count the value of that education award when determining the amount of the education award they are eligible to earn through their own service (i.e. a member whose grandmother transferred to him/her a 0.5 value education award can only

earn up to 1.5 education awards through his own service). Members may serve additional terms of service even if they have reached the limit of two full-time education awards. Members may serve up to four terms in AmeriCorps State & National, three terms in AmeriCorps VISTA (including VISTA Summer Associates), and two terms in AmeriCorps NCCC.

The education award can be used to pay education costs at qualified institutions of higher education (i.e. tuition, fees, etc.), to pay for educational training (i.e. non-degree programs such as technical or vocational training), and to repay qualified student loans (generally federal student loans, NOT private loans). Members can make payments from their award in full or in part and can take up to seven years after their term of service has ended to use their award. Individuals who receive a transferred award have up to 10 years from the date in which the transferring individual earned the award to use it. Members will manage their education awards through the eGrants/MyAmeriCorps Portal.

Some institutions will match the education award if it is redeemed at their school, but claiming the education award up front may also affect a member's eligibility for other financial assistance. Members should research the best option for their individual circumstances.

AmeriCorps Segal Education Award payments (interest and award disbursements) are taxable as federal income in the year they are redeemed. Members should anticipate this when choosing when and how much of their education award to redeem.

Members agree to serve for a certain period of time and to complete a minimum number of hours during that time period. Members who fulfill these requirements, serving satisfactorily, are exited from the program with a full education award. Members must receive a final evaluation certifying that they meet the requirements for a successful exit with a full award. Programs must change the member status to Exited in OnCorps and need to exit the member in the eGrants/MyAmeriCorps Portal within the 30-day deadline, and must maintain records documenting satisfactory completion of program requirements. The total hours completed entered into the Portal must match the total approved hours in OnCorps, always rounded down to a whole number. No prior approval is required to exit members who successfully complete their term.

#### 4I. Member Benefits

All members should be informed of their eligibility for AmeriCorps benefits such as the living allowance, healthcare, student loan forbearance, and childcare (45 CFR 2522.240-.250). Information about member benefits should be included in the member contract. If any member waives a program benefit, the program must maintain proper documentation of the waiver in the member file.

Programs must provide members a living allowance that falls within the minimum and maximum amounts established each program year and announced in the federal Notice of Funding Opportunity (NOFO). Member living allowances are distributed to members evenly throughout their term based on the program design. All member living allowance payments must be recorded in the program's general ledger. Living allowances are not an hourly wage. Distributions for members will vary depending on the length of their service agreed upon in their Member Service Agreement. For example, if full-time members are required to serve their terms in 10 months, the program must pay at least minimum living allowance (e.g. \$12,630) over ten months ([Nevada Volunteers Living Allowance Payment Schedule Policy](#)). If a program's 300-hour members are required to complete their terms in 3 months, the program must disburse the full living allowance over three months. If a member does not complete his/her term of service within the amount of time designated, and the program extends the member's



term, the member must complete his/her service hours with no additional living allowance payments. See table below for more situational examples.

Member Situation	Length of Service	Amount per Month	Total Living Allowance Provided
Member A starts and finishes on time	10 months	\$1,210	\$12,100
Member B starts on time and finishes one month early	9 months	\$1,210	\$10,890
Member C starts late and finishes late	10 months	\$1,210	\$12,100
Member D starts on time and finishes one month late	11 months	\$1,210	\$12,100
Member E starts one month late and finishes on time	9 months	\$1,210	\$10,890

Source: Financial and Grants Management Institute. (2012). *Round Robin: AmeriCorps: Living Allowance Distributions, Handout 1*.

The living allowance is taxable as income. Programs are responsible for setting up their payroll systems to account for FICA. Although under federal law members are not considered “employees” for purposes of the program, federal law appears to provide an exception for workers’ compensation purposes. Nevada requires that all AmeriCorps members are covered by the agency workers’ compensation plan for service-related injuries. Costs incurred providing workers’ compensation for members is an allowable cost to the grant. AmeriCorps members are not, however, considered employees for the purposes of unemployment insurance coverage ([State of Nevada Unemployment Insurance Determination](#)).

AmeriCorps programs must provide, or make available, a health plan to 1700-hour full-time members who are not otherwise covered by a healthcare policy at the time the member begins his/her term of service. The program must also provide, or make available, healthcare insurance to members serving a 1700-hour full-time term who lose coverage during their term of service as a result of service or through no deliberate act of their own. Programs may offer health insurance to less-than-full-time members serving in a full-time capacity. For purposes of this provision, a member is serving in a full-time capacity when his/her regular term of service will involve performing service on a normal full-time schedule for a period of six weeks or more. The plan must meet the AmeriCorps health care standards detailed in the Terms and Conditions. Subgrantees must immediately notify CNCS’s designated agents, in writing, when a member’s status changes in a manner that affects their eligibility for healthcare.

The grantee must ensure that childcare assistance is made available to those full-time members who need such assistance in order to participate. Members are eligible if, at the time of acceptance into the program, the member is not currently receiving child care assistance from another source, including a parent or guardian, which would continue to be provided while the participant serves in the program. This benefit is provided through the Corporation and the state of Nevada, meaning it does not come out of the program’s budget. If a member decides to utilize this benefit, the program must maintain all documentation in the member’s file. All full-time members must sign a waiver of this benefit if they decide not to utilize it. A copy of this enrollment or waiver must be included in each full-time member’s file. Visit [www.americorpschildcare.com](http://www.americorpschildcare.com) for more information. This program is administered through a block grant provided to the state of Nevada. More information on Nevada childcare policies can be found on the [Nevada Division of Welfare and Support Services website](#).

National service members have options for how to deal with their student loan payments during service. Members request deferment and/or forbearance through the eGrants/My AmeriCorps Portal. To access

and complete forms for forbearance or interest accrual payment, the member must be registered at <https://my.americorps.gov/mp/login.do>. Program directors should be cautious about promising these benefits to members because lending institutions have latitude in deciding whether they will grant these statuses depending on the type of loan, whether it has been consolidated, and a number of other factors. Loans already in forbearance cannot be switched to forbearance due to AmeriCorps service, and are not eligible for the interest accrual payment option. If there are questions, the member should work directly with his/her lending institution to determine whether he/she qualifies.

Under the National and Community Service Trust Act of 1993, borrowers serving in approved national service positions qualify for mandatory forbearance during their terms of service. This mandatory forbearance allows borrowers to delay payments temporarily. Mandatory forbearance for approved national service positions is available for the following educational loans: Federal Family Education Loans (Subsidized and Unsubsidized Stafford Loans, Supplemental Loans To Students (SLS), Consolidation Loans), William D. Ford Federal Direct Student Loans (Direct Subsidized and Unsubsidized Stafford/Ford Loans, and Direct Consolidation Loans), Federally Insured Student Loans (FISL), Health Education Assistance Loans (HEAL), Health Professions Student Loans (HPSL), Loans for Disadvantaged Students (LDS), Nursing Student Loans (NSL), and Primary Care Loans (PCL). During the time members are serving in a national service position, interest will continue to accrue on their loans. Upon successful completion of their national service term, CNCS will pay all or a portion of the interest that accrued during the time period served. If members leave for reasons other than compelling personal circumstances, they will be responsible for payment of interest and, if not paid, it may be capitalized depending on the type of loan.

#### **4m. Member Timesheets**

Nevada Volunteers requires that all programs use OnCorps as the official timekeeping system for members. Programs are required to ensure that time and attendance recordkeeping is conducted by AmeriCorps members. Time logs must be completed by members and approved by host site supervisors and/or program directors in the OnCorps online timekeeping system on a regular basis. Program directors must set up the OnCorps time tracking system and instruct members so that they separately record time spent on service, fundraising, and training correctly. OnCorps regularly offers training webinars and tutorials can be found on the website under the *Help* menu tab. Members must maintain their own timekeeping account and password and enter their hours directly. Site supervisors must also have an OnCorps account so that the individual directly overseeing the member's service is the one to approve the timesheets in OnCorps. Program Directors must then review all timesheets and provide final approval of timesheets within 30 days.

#### **4n. Member Supervision**

Nevada Volunteers recommends having clear disciplinary policies for AmeriCorps members. Member concerns should be well documented in member files. Any serious member disciplinary actions should be discussed with your AmeriCorps program contact. Nevada Volunteers recommends having clear Corrective Action Plans for members who are not in compliance with their Member Service Agreement and addressing issues promptly. Many programs express frustration with member supervision during the middle and end of the program year. Clear policies that are consistently followed will help to prevent these issues.

#### **4o. Public Assistance Program**

AmeriCorps Service has varying effects on public assistance programs. It is always important to check current regulations regarding various programs before promising specific benefits to members. The

most common public assistance programs that members may have questions about are the Supplemental Nutrition Assistance Program (SNAP), housing assistance, Medicaid and Temporary Assistance to Needy Families (TANF).

If the benefits program is federally-funded and is based on need, and is not provided under the Social Security Act (other than SSI), AmeriCorps State and National benefits should not affect an AmeriCorps member's eligibility for such assistance (National Policy FAQ part C). Generally receiving the living allowance does not affect a member's eligibility for federal, need-based housing assistance, such as Section 8 housing and other federally subsidized housing, and SNAP benefits. See the [CNCS Memo Regarding Eligibility](#) for more information about SNAP benefits. AmeriCorps members can lose their TANF benefits when they begin receiving a living allowance because it is funded under SSI. The living allowance amount is taken into account in determining eligibility for TANF benefits.

The U.S. Department of Health and Human Services (DHHS) recognizes that AmeriCorps members, who will receive AmeriCorps healthcare coverage, may be receiving Medicaid coverage also. DHHS has stated that AmeriCorps Medicaid recipients are not waived from AmeriCorps health care coverage. Because Medicaid "wraps around" other available health care coverage, Medicaid will only pick up the costs that are not covered under the primary AmeriCorps policy (National Policy FAQ part C). Medicaid is always a secondary form of coverage when there is another health care policy in place. Members who remain on TANF will continue to receive Medicaid for their dependents. Members who lose TANF due to the living allowance may still qualify for Medicaid or Family Health Plan. For general questions about SSI go to: <http://www.socialsecurity.gov/ssi/index.htm>

#### 4p. Grievance Procedure

Programs must develop an internal grievance procedure that conforms with the requirements set forth in 42 U.S.C. §12636 and 45 CFR §2540.230. The Member Service Agreement must include the internal grievance procedure developed by the subgrantee and approved by Nevada Volunteers during the pre-award grant process. Programs must maintain documentation of grievances filed and the program's response.

#### 4q. Supporting Members with Disabilities

Including people with disabilities in National Service is a priority for Nevada Volunteers. Nevada programs should always seek to be inclusive in their program design and make reasonable accommodations for members. Please see the following resources for more information on creating an inclusive program:

- [National Service Inclusions Project Handbook](#)
- [Disability Inclusion Resource Guide](#)
- [Glossary of Disability and National Service Related Terms](#)
- [Effective Practice Guide for Inclusion](#)

#### 4r. Member Training

Members are required to receive certain trainings (45 CFR 2520.50 and 2522.100). Since all members are required to receive training, members with zero training hours listed will raise concerns in member monitoring. No more than 20 percent of an AmeriCorps member's service hours in your program may be spent in education and training activities. Capacity-building activities and direct service activities do not count towards the 20 percent cap on education and training activities. Additionally, on-the-job training should not be considered training hours on member timesheets. On-the-job training should be considered service hours.

Programs should use sign-in sheets, webinar attendance logs, or other methods to document member attendance at, and completion of, program-provided member trainings. If a member attends an outside training to fulfill specific AmeriCorps program requirements, he/she should turn in to the program director an agenda or confirmation notice signed and dated by the training facilitator for retention in the member file. In instances of virtual trainings, a member should print a screenshot to sign and date for documentation, or print/sign/date the post-training follow-up notice and materials.

Members should participate in trainings on [Life After AmeriCorps](#). This should include information like including national service on resumes, interview training and connecting members with AmeriCorps Alums.

#### 4s. Member Evaluations

All full-time and all half-time members must have a mid-term and end-of-term written evaluation (45 CFR 2522.220 and 45 CFR 2526.15) Mid-term evaluations are not required for members who exit before the mid-point of their terms, or for members serving less than half-time. All members, regardless of term of service or successful completion, must have a written end-of-term evaluation. Member evaluations should contain both the member's and supervisor's signatures and be dated by both parties. The end-of-term evaluation should address at a minimum: whether the member has completed the required number of hours, whether the member has satisfactorily completed assignments, and whether the member has met other performance criteria that were clearly communicated at the beginning of the term of service.

All members who exit early must have a member end-of-term evaluation completed at the time of their exit and the evaluation must be maintained in the member file. They are not required to have a mid-term evaluation if exited before the mid-point of their service. Completing the exit form in the eGrants/My AmeriCorps Portal is not sufficient to meet the evaluation requirement.

#### 4t. Early Termination

Members may be released early from their term of service for compelling personal circumstances or for cause. The grantee is responsible for determining and documenting compelling personal circumstances (45 CFR 2522.230). Please review 45 CFR 2522.230 to determine if the member has a compelling personal circumstance and contact your Nevada Volunteers Program Contact. The Corporation and its auditors may review these circumstances as part of their oversight and monitoring responsibilities. Members released for compelling personal circumstances qualify for a pro-rated education award if they have served at least 15 percent of the service term, and the position is not available to be refilled.

Members are released for cause if they do not successfully complete their term of service, for any reason that does not qualify as a compelling personal circumstance. Also, all members who complete less than 15% of their term of service must be released for cause in eGrants/MyAmeriCorps Portal. Members exited early for cause are not eligible for an education award.

It is possible for a member to be terminated from the program for cause and still receive a satisfactory performance evaluation. In these cases, the member would be eligible for subsequent AmeriCorps term(s) of service, as long as he/she performed satisfactorily during the term of service from which he/she was released for cause. Any individual released for cause is required to disclose the release when applying for any subsequent term of service. Failure to disclose past exits for cause will render an individual ineligible to receive the AmeriCorps education award, whether or not that individual successfully completes the subsequent term of service. Members released early from service for disciplinary action are not eligible for future terms of service.

Full documentation of the reasons for any early exit must be maintained in the member’s file. Programs must ensure that member timesheets are up to date and that an End-of-Term Evaluation is completed prior to terminating a member.

#### 4u. Exiting Members

AmeriCorps members may be exited from the program because they have successfully completed their term, because they must terminate their service early due to a compelling personal circumstance, or because they terminate their service early for cause (45 CFR 2522.230). The exit status of a member determines whether he or she earns an education award and may affect his/her eligibility for future AmeriCorps service.

Did the member serve through the contract end date?	Did the member meet the minimum hours’ requirement ?	Did the member perform satisfactorily ?	Exit Type	Education Award Eligibility	Future Service Eligibility (Subject to Term Limits)
Y	Y	Y	Successful Completion	Eligible for Full Award	Eligible
Y	N	Y	Cause	Not Eligible for Award	Eligible- Must Disclose Prior Release for Cause
N	N	Y	Compelling Personal Circumstances	Eligible for Partial Award*	Eligible
N	N	Y	Cause	Not Eligible for Award	Eligible- Must Disclose Prior Release for Cause
N	N	N	Cause	Not Eligible for Award	Not Eligible

\* Eligible if the member served at least 15% of the minimum service hours

All members must be exited in eGrants as this is the official system of record for the Corporation. As the program is managing the member exit process, they should be mindful of the Corporation’s 30-day exit requirement between the member’s exit date and the completion of the eGrants exit process and allow adequate time to collect information and record it in the Portal as needed. If you need assistance with this process in eGrants, there are [tutorials on the Knowledge Network](#).

Prior to exiting a member, the program must verify the number of approved hours served by the member in OnCorps. The program will enter this number of approved hours in eGrants, rounded down to the next whole number. It is also highly recommended that the program director ensure that all required documents are included in the member’s file. That will enable the program director to attempt to obtain any missing documents prior to exiting the member.

## 5: Financial Management

The grantee has full fiscal and programmatic responsibility for managing all aspects of grant and grant-supported activities, subject to the oversight of Nevada Volunteers. It is important for there to be a clear understanding that grant and financial management are inextricably linked. Poor member and program management have negative impacts on financial management because compliance issues often result in disallowed costs. It is the responsibility of all staff to be aware of effective grants and financial management standards, be good stewards of federal resources by practicing strong financial, grant, program and member management, and to work to continually improve the systems and practices used in these areas.

### 5a. Regulations

To deliver on the promise of a 21st-Century government that is more efficient, effective and transparent, the Office of Management and Budget (OMB) streamlined financial management guidance with [Title 2 of the Code of Federal Regulations](#). This Uniform Guidance took effect on December 26, 2014. AmeriCorps grants are also subject to the [Grant Terms and Conditions](#), state and local regulations, the NOFO and your AmeriCorps Subgrant Agreement. Terms and Conditions are the guiding principles for CNCS-funded grants.

### 5b. Financial Management Systems and Policies

Below is a list of systems and activities that are important for strong financial management of AmeriCorps funding.

- Maximize segregation of financial duties to serve as a checks and balances system. System should be appropriate to the size of the organization's financial and human resources. The system should ensure adequate documentation is kept and organized.
- Adopt written financial procedures to monitor major expenses.
- Organizations whose federal expenditures for the organization's fiscal year exceed \$750,000 must have a single or program-specific audit conducted for that year.
- All programs should operate under a set of written financial management procedures. Upon request, these policies should be available for review by the CNCS, Nevada Volunteers, or other party acting on Nevada Volunteer's behalf.
- The AmeriCorps account must be a separate account or have a separate account number. All Corporation grant awards must be tracked separately.
- Members must receive their stipends in equal installments over the term of service. The stipend is not dependent on the number of hours worked in any service period. Remember that the stipend is taxable.
- Programs must have sufficient liability insurance to protect the organization, employees, members and volunteers. Members engaged in both on- and off-site project activities must be covered. You should review your current policies to ensure they cover non-employees in special statuses, such as members and volunteers.
- You are responsible for tracking in-kind services from partners and from your own agency. This includes donated items as well as staff time, and requires time and effort reporting.
- A system must be developed to track your cash match.
- AmeriCorps staff members' time and related expenses may not be charged to the CNCS (federal) or Grantee share (match) while engaged in organized fundraising, including financial campaigns, endowment drives, general solicitation of gifts and bequests, door-to-door

solicitations, direct mail or similar activities for which the sole purpose is raising capital or obtaining contributions for the organization.

- Procedures must be established for determining reasonableness, allocability, and allowability of costs, in accordance with applicable cost principles and terms of the grant. Procedures shall be applied consistently across all programs.
  - i. Reasonable:** To be reasonable, a cost must meet the following criteria:
    - Is consistent with the judgment of any prudent person under the circumstances prevailing at the time the cost is incurred or allocated
    - Is generally recognized as ordinary and necessary for the operation of the grant or program, or cost objective being charged
    - Is consistent with sound business practices, established laws and regulations, and terms of the program being charged
    - Is consistent with the market price for comparable goods or services
    - Any deviation from established practices by the entity is explained and justified
    - Be authorized, or not prohibited, under state or local laws or regulations
    - Conform to any limitations or exclusions set forth in these principles, federal laws, or other governing limitations to type or amount of cost items
    - Be accorded consistent treatment through application of generally accepted accounting principles appropriate to the circumstances
    - Not be allocable to or included as a cost of any other program in either the current or a prior period
    - Be net of all applicable credits
    - Be adequately documented
  - ii. Allocable:** A cost that can be assigned or charged to one or more activities or items (cost objects) based on benefits received or other such equitable or logical association, although a direct relationship may not be established. A shared cost that is allocable to a specific program may not be shifted to another program to avoid a funding deficiency, restriction imposed by regulation, rule or contract, or for any other reason not reflective of benefit received. A shared cost is allocable:
    - Based on its relative benefits received
    - If it is treated consistently with other costs incurred for the same purpose in like circumstances and if it:
      - Is incurred specifically for the award
      - Benefits both the award and other work and can be distributed in a reasonable proportion to the benefits received
      - Is necessary to the overall operation of the organization
  - iii. Allowable:** To be allowable, costs must:
    - be necessary and reasonable for the proper and efficient administration of the AmeriCorps Program,
    - conform to grant award limitations or cost principles
    - be consistent with policies and procedures that apply to the federal and non-federal activities of the organization
    - be included in the approved program budget
    - be given consistent treatment
    - be in accordance with Generally Accepted Accounting Principles (GAAP)
    - not be included as a cost or used to meet cost sharing or matching requirements of

- any other federally-financed program
- be adequately documented

Unallowable costs are detailed in the relevant federal regulations. Please note: In some cases, writing of the AmeriCorps grant may not be an allowable activity that can be charged as an expense or match to the AmeriCorps grant. Program officials should review the appropriate section of 2 CFR referenced above to determine whether the cost is allowable.

It essential to keep these principals in mind.

- [OIG Fraud Red Flags](#)
- [OIG Corrective Actions](#)

## 5c. Budget

During the 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 be sent to Nevada Volunteers by email. 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 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.

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. 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 subgrants 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.

## 5d. Match

All cost reimbursement grant programs are expected to meet the matching requirements as outlined in the approved budget (45 CFR 2521.35-45 and 45 CFR 2521.90). (Please note: there is no match requirement for fixed amount grant programs.) The chart below details the minimum matching requirements, which are based on the grant year cycle.



	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Year 4</b>	<b>Year 5</b>	<b>Year 6</b>	<b>Year 7</b>	<b>Year 8</b>	<b>Year 9</b>	<b>Year 10 (+)</b>
<b>Minimum Overall Share</b>	24%	24%	24%	26%	30%	34%	38%	42%	46%	50%

[CNCS Memo Regarding Use of Federal Funds for Match](#)

Under certain circumstances, applicants may qualify to meet alternative matching requirements that increase over the years to 35% instead of 50% as specified in the regulations at §2521.60(b). To qualify, you must demonstrate that your program is either located in a rural county or in a severely economically distressed community.

In determining whether a program is rural, CNCS will consider the most recent Beale code rating published by the U.S. Department of Agriculture for the county in which the program is located. Any program located in a county with a Beale code of 4,5,6, 7, 8 or 9 is eligible to apply for the alternative match requirement.

In determining whether a program is located in a severely economically distressed county, CNCS will consider the following list of county-level characteristics.

- The county-level per capita income is less than or equal to 75 percent of the national average for all counties using the most recent census data or Bureau of Economic Analysis data
- The county-level poverty rate is equal to or greater than 125 percent of the national average for all counties using the most recent census data
- The county-level unemployment is above the national average for all counties for the previous 12 months using the most recently available Bureau of Labor Statistics data
- The areas served by the program lack basic infrastructure such as water or electricity

Except when approved otherwise, CNCS will determine the location of your program based on the legal applicant’s address. If you believe that the legal applicant’s address is not the appropriate way to consider the location of your program, you must provide relevant facts about your program location in your request. CNCS will, in its sole discretion, determine whether some other address is more appropriate for determining a program’s location. If your program is located in one of these areas, please contact your AmeriCorps program contact. A request will need to be sent to CNCS for an alternate match. You must submit your request to the alternative schedule per the information contained in the Notice.

**5e. Fiscal Reporting**

Nevada Volunteers and CNCS require two types of financial reports: Periodic Expense Reports (PER) and Aggregate Financial Reports (AFR). All AFRs and PERs 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. Due dates for AFR’s and PER’s are outlined each year through the subgrant agreement.

## Periodic Expense Report

Programs submit PERs to request reimbursements monthly in OnCorps (longer running programs can submit less frequently). Nevada Volunteers processes invoices twice monthly and must be in receipt of all invoices by 5 p.m. on the 10th day and the 25th day of each month. If the 10th or the 25th falls on a weekend or holiday, the invoices must be received by 5 p.m. the next business day. Programs are required to upload back-up documentation for each PER through the OnCorps system, including a general ledger, statements of revenue/expenses, and balance sheets. Further documentation may be requested for AFRs or PERs as deemed appropriate by staff. PERs 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 Report/Federal Financial Report

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) [Federal Financial Report FAQ](#). The FFR includes aggregate information for all Nevada Volunteers funded AmeriCorps programs. Aggregate Financial Reports (AFR/FFR) provide aggregate funding information, due with Q2 and Q4 reports in OnCorps. AFRs 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. A final FFR is due within 60 days of the end of a program year.

## 5f. Estimated Unexpended Funds Reports

Prior to issuing annual Competitive and Formula grant awards, CNCS sends Nevada Volunteers requests for estimates of unexpended funds. CNCS uses this information to determine if Nevada Volunteers has any anticipated unexpended funds to be returned to CNCS. To obtain the necessary information to report to CNCS, Nevada Volunteers will send an email to each program and ask them to complete an Unexpended Funds Report. Programs should report as accurately as possible anticipated unexpended funds at the time the email is received.

## 5g. Grant Closeout

Nevada Volunteers requires all subgrantees 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 closeouts for all grants that have operated for a three-year period and the annual closeout forms from subgrantees are used to complete this requirement since prime and subgrants can run on different timelines.

The annual closeout process includes completion of the following:

- Closeout Tasks Checklist - Includes certification that all members have been exited, progress reports have been completed, and the program is in full compliance.
- AFR/FFR - All programs must submit semi-annual Aggregate Financial Reports (AFRs) through the OnCorps system as instructed in the subgrant agreement. In addition, at the end of a three-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 three years). The report must also reflect the required percentage of matching funds that the subgrantee has agreed to contribute under the terms of the grant.
- 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.

- 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.

Unexpended Funds - If a program has drawn funds under the grant but not expended them, the program will need to return the funds to CNCS. Funds are returned by a check made payable to the Department of Health and Human Services.

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.

Disposition of Equipment - When original or replacement equipment acquired under a subgrant 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:

- 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.
- 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.
- In the case where a subgrantee fails to take appropriate disposition actions, the awarding agency may direct the subgrantee to take excess and disposition actions.

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:

- The requirement to retain records pursuant to the grant provisions
- The requirement and right for audit pursuant to the grant provisions
- The right of the Corporation to disallow costs and recover funds on the basis of Single Audit, other audit, or other review
- 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

## 5h. Audit Requirements

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 per the site visit procedures outlined in this manual. Qualifying AmeriCorps programs must submit their Single Audit Report to the Commission within nine months of the end of the program fiscal year.

## 6: What to Expect from Nevada Volunteers

Nevada Volunteers monitors subgrantees 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. Nevada Volunteers also provides technical assistance and training to subgrantees.

AmeriCorps Program Directors are expected to contact their Nevada Volunteers Program Contact with program questions and concerns. Please see your reporting requirements document: [New and High-Risk Programs](#), [Low and Mid-Risk Programs](#), for a comprehensive lists of when you should contact your AmeriCorps Program Contact.

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. 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, [2018 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.

## 6a. On-Going Monitoring

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
- Member Assignment Listings
- Healthcare and childcare exit, as applicable
- Criminal History Background check requirements
- PER reporting and supplemental documentation requirements
- AFR reporting requirements

## 6b. Program Monitoring Site Review and Financial Site Review

Nevada Volunteers staff 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 Subgrant Agreement. At minimum, the following records must be available for the compliance monitoring review either provided in-person or via desk-audit:

- AmeriCorps member files

- Documentation of member eligibility
- Documentation of members' time by review of member's timesheets
- 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

Program and fiscal staff are notified in writing by Nevada Volunteers staff regarding upcoming compliance monitoring processes 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 Program Monitoring Site Review and Financial Site Review processes that are necessary to complete the standardized review tools.

- [Program Monitoring Site Review Tool](#)
- [Financial Site Review Tool](#)

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.

	<b>Low/Mid Risk</b>	<b>High-Risk/New</b>
Progress Reports	Bi-annually	Quarterly
Financial Report	Bi-annually	Bi-annually
Pre-Award Document Review	Annually	Annually
Pre-Award Risk Assessment	Annually	Annually
Fiscal Site Visit	Annually	Annually
Monitoring Site Visit	Annually	Annually
TTA	As needed	As needed
Close-out Certification	Annually	Annually

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 calendar 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 has closed the site review, a final

notification of compliance and closeout notice will be provided to the subgrantee once all matters have been addressed.

## 6c. 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 monthly and on at least a quarterly basis. 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 the OnCorps system. 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 5th or 20th of each month. All programs must pay special attention to this timetable to avoid potential cash flow problems.

## 6d. Training and Technical Assistance

Programs have access to this Nevada AmeriCorps Program Director Handbook, which is updated annually on the Nevada Volunteers website. As policy changes occur, Nevada Volunteers sends updates to all Program Directors via email and provides explanations during required Program Director update webinars that take place monthly. Subgrantees will have scheduled monthly conference calls with their Nevada Volunteers Program Contact. Nevada Volunteers develops an annual training calendar for AmeriCorps subgrantees based on challenges and needs that have been identified by Nevada Volunteers staff or input provided by subgrantees. Feedback from subgrantees is sought through formal and informal surveys and discussions. The training calendar is posted in OnCorps and on the Nevada Volunteers website. In addition to these regularly scheduled meetings, Nevada Volunteers staff is readily available by phone or email to answer questions, offer solutions, and support subgrantees as needed. Throughout the grant period, your Nevada Volunteers Program Contact will document 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. 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, Nevada Volunteers may send an official letter of non-compliance outlining deadlines for the program to complete appropriate corrective actions.

## 6e. Noncompliance Policy

Notices of Noncompliance are sent to programs for repeated failure to meet expectations outlined in the subgrant agreement, including ensuring that member time sheets are approved on time, submitting reports late, and for failure to submit Periodic Expense Reports (PERs) on time. Notices of Noncompliance will result in a higher risk rating for programs. Accumulation of multiple Notices of Noncompliance may result in loss of funding if corrective actions are not taken.

Program directors are expected to review and approve all time sheets in OnCorps within 30 days of the end of the pay period. The first time a program's time sheets are not approved, the program director will receive a verbal warning during the monthly individual check-in call. If the issue is not resolved within 30 days, they will receive a written notice by email. If the time sheets are not brought into compliance within 14 days, a Notice of Noncompliance will be sent to the program director and the executive director of the organization.

Fiscal contacts are expected to submit PERs monthly unless they have permission from Nevada Volunteers to submit quarterly. If fiscal contacts do not submit PERs by the deadline, they will receive a verbal warning from the director of AmeriCorps. A second incidence of noncompliance will result in a written warning to the fiscal contact. If the issue is not resolved by the next AP due date, the executive director of the organization and the fiscal contact will receive a Notice of Noncompliance. If there is a consistent pattern of incorrect PER submissions (two consecutive months as defined by requiring more than three PER submissions prior to approval) the director of AmeriCorps will issue a Notice of Noncompliance to the fiscal contact, the program director, and the executive director of the organization.

Late reporting including GPRs, AFRs/FFRs, Unexpended Funds Report, and grant closeout documents will also result in a Notice of Noncompliance.