# **Nevada Volunteers**

# AmeriCorps Program Director Handbook 2024-2025



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#### 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 and run 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 successful and 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 federal regulations, guidelines, and grant 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. 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 your 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 sends people power and funding to communities across the country. Every year, AmeriCorps places more than 200,000 AmeriCorps members and AmeriCorps Seniors volunteers with more than 30,000 nonprofits, schools, public agencies, and community and faith-based groups across the country. Members help communities tackle their toughest challenges 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 four 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; AmeriCorps Seniors for individuals 55+ who want to give back and make a positive difference in their community; and AmeriCorps National Civilian Community Corps (NCCC), a team-based residential program for young adults 18-26 who carry out projects in public safety, the environment, youth development, and disaster relief and preparedness.

AmeriCorps is the federal agency that funds organizations to make positive impact in communities. AmeriCorps provides more than \$800 million in grants every year to support placement of AmeriCorps members and AmeriCorps Seniors volunteers in communities.

#### **National Service History**

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.

**1964:** President Lyndon B. Johnson brought the spirit of the Peace Corps home to America by creating Volunteers in Service to America (VISTA). 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. In 1974, the Retired Senior Volunteer Program (RSVP), the Foster Grandparents Program, and the Senior Companions Program were developed to engage older Americans in the work of improving the nation.

**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. In 1992, The National Civilian Community Corps (NCCC) was created to help communities recover from disaster and other critical needs.

**1993:** 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.

**1994:** The first class of AmeriCorps members including 20,000 individuals from across the county took the pledge to "Get Things Done for America."

**2002**: President George W. Bush called on all Americans to serve their country for the equivalent of two years in his State of the Union address on January 29, 2002. 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 AmeriCorps Seniors, and to raise awareness of, and break down barriers, to service opportunities with all federal government agencies.

**2009**: 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.

**2013:** President Obama 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.

**2016**: AmeriCorps reaches 1 million members who have chosen to serve their communities through national service.

**2024:** AmeriCorps celebrates its 30<sup>th</sup> anniversary.

## **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

Regulations

45 CFR XII 45 CFR XXV

#### **Terms and Conditions (Provisions)**

<u>AmeriCorps State and National Specific Terms and Conditions</u> updated annually <u>AmeriCorps State and National General Terms and Conditions</u> 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 AmeriCorps has provided for your program as well as your obligations to raise matching funds and/or in-kind contributions.

#### 1c. AmeriCorps

Established in 1993, AmeriCorps, formerly known as 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: AmeriCorps and AmeriCorps Seniors. As the nation's largest grant-maker for service and volunteering, AmeriCorps plays a critical role in strengthening America's nonprofit sector and addressing our nation's challenges through service. The AmeriCorps 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.

- <u>Executive Leadership</u>
- <u>AmeriCorps Region Offices</u>
- <u>AmeriCorps Strategic Plan</u>

AmeriCorps issues periodic and annual guidance to grantees to help with interpretation of the laws governing AmeriCorps. In addition, AmeriCorps has an extensive collection of resources available on their website. You can find information on many topics 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 organization's internal policies and procedures.

AmeriCorps Manage Your Grant Page

#### 1d. Nevada Volunteers

State Service Commissions, such as <u>Nevada Volunteers</u>, oversee the annual grant competition (<u>NOFO process</u>), 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. Most states, plus the District of Columbia, Guam, and Puerto Rico, 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.

## 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 AmeriCorps Regional 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 AmeriCorps 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 AmeriCorps for competitive consideration, and AmeriCorps makes the final competitive awards decision. Congress determines the availability of funds, and AmeriCorps 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 AmeriCorps 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, AmeriCorps 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 AmeriCorps.

#### **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 expense 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 AmeriCorps. 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 Notice 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 AmeriCorps

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 non-compliance 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 Executive 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. AmeriCorps always has final approval rights for all Nevada Volunteers' competitive grant awards, thus competitive decisions cannot be overturned by Nevada Volunteers.

# 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.

<u>Nevada State Service Plan 2020-2023</u>

#### 1g. America's Service Commissions

<u>America's Service Commissions</u> (ASC) is a nonpartisan, nonprofit organization representing and promoting state service commissions across the United States and territories. ASC is a peer network of governor-appointed commissioners and state service commission professional staff. They organize the annual National Training Conference that Program Directors attend each year and provide the Member Assistance Program (MAP) that all Operational subgrantees are required to budget for, providing members 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. Evaluating a program's risk level includes but is not limited to an assessment of the following factors:

- Audit results
- Legal applicant experience managing AmeriCorps grants
- Staff experience with AmeriCorps State program administration
- Results of federal awarding agency or OIG monitoring
- Financial reporting
- Match requirement
- Spend down of previous grants
- Participation in trainings/meetings

- Results of prior program year site visit Implementation of corrective action
- findings from prior year site visit
- **Progress** reporting
- Performance measure attainment
- Organization or system changes
- . Member enrollment timeline
- Member retention
- Member exit timeline
- NSCHC compliance

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. Nevada Volunteers 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 performing work and may not incur costs prior to the actual start date of the approved grant period as listed in the subgrant agreement. If preaward 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 AmeriCorps, 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
- Host Site Agreement
- AmeriCorps Online Trainings:
  - <u>Key Concepts of Grants and Financial</u> Management Online Training Course
  - <u>National Service Criminal History Check Online</u> <u>Training Course</u>
  - o Fraud Awareness Training Course
  - <u>Developing Policies and Procedures Training</u> <u>Course</u>
- Member Position Descriptions

- Programmatic Information Sheet
- 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
- Set-up of Truescreen and Fieldprint accounts
- Data Collection Plan
- Organizational Chart
- Start-up Institute attendance

#### **2c.** Performance Measures

<u>Performance Measures</u> (45 CFR 2422.530-45 and 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 AmeriCorps approve, national performance measures and/or program-identified performance measures to be reported to AmeriCorps. 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 AmeriCorps are incorrect. Please make sure to enter the Performance Measure data according to the tutorial in OnCorps under the help menu.

# 2d. eGrants and OnCorps

#### eGrants

<u>eGrants</u> is the grants management system used by AmeriCorps. It is also called the My AmeriCorps Portal when used by members. Grant proposals and amendments are submitted in eGrants. <u>Member Service Opportunity</u> <u>Listings</u> must be entered in eGrants for all member positions. Members must be enrolled in eGrants within 8 days and exited through eGrants within 30 days. Here is the <u>AmeriCorps Member Enrollment Policy</u> and <u>Member Enrollment Guide</u>. Issues with eGrants should be directed to the <u>help desk</u>.

#### OnCorps

<u>OnCorps</u> is the online software used by Nevada Volunteers for grant reporting, member <u>timesheet</u> tracking, and data collection. It is Nevada Volunteers' system of record management and all <u>Member Position Descriptions</u>, financial and programmatic reporting and time keeping should be stored in this system. Timesheet review and approval also occurs in OnCorps. Nevada Volunteers will provide you with a username and password to access 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.

# 2e. 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. Agreements 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 <u>sample Host Site Agreement</u> for your reference.

AmeriCorps programs are encouraged to utilize a written site selection process 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).

## 2f. 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 Service Opportunity Listing must be approved by AmeriCorps in eGrants. Member position descriptions can be listed anywhere your organization would typically post a position such as with colleges and universities, local or national job boards, or other groups affiliated with your organization mission.

As an AmeriCorps program, you must also ensure an equitable member selection process. You must have completed and signed member applications; have documentation of a uniform selection process; 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.

# 2g. Member Eligibility

To be eligible to enroll in AmeriCorps, individuals must meet the eligibility requirements outlined in <u>45 CFR</u> <u>2522.200</u>: 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; satisfy the National Service Criminal History Check eligibility criteria (45 CFR 2540.202) 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.

# 2h. AmeriCorps Program Identification

As a program that is part of the AmeriCorps National Service Network, AmeriCorps Program identification must comply with the <u>AmeriCorps Branding and Messaging Guidance</u> issued by AmeriCorps and the AmeriCorps Logo requirements in the AmeriCorps Grants Terms and Conditions and outlined in 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. Only gear with the AmeriCorps log may be charged to the AmeriCorps/CNCS Share of the budget.

#### 2i. Disability and Accessibility

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 AmeriCorps to support members with reasonable accommodations. For more information regarding requests for accommodations, please contact your Nevada Volunteers program contact. Additional resources are available on the <u>Disability and Accessibility</u> section of the AmeriCorps website.

# 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 <u>General</u> and <u>Specific</u> Terms and Conditions)

# **3b.** Progress Reporting

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

- <u>Reporting Requirements for New and High-Risk Programs</u>
- <u>Reporting Requirements for Low and Mid-Risk Programs</u>

Progress Reports monitor a program's progress toward meeting annual performance measure targets, assess program strengths and challenges, highlight unique program achievements and identify opportunities for further training and technical assistance. Nevada Volunteers uses this information not only to report to AmeriCorps, 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 Grant Progress Reports submitted to AmeriCorps 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

# **3c. Program Evaluation**

The first time a program re-competes at the competitive 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). Please note that formula programs should have evaluation plans but do not need to meet the requirements below from AmeriCorps. AmeriCorps has a number of resources on the evaluation process on their website <u>here</u>, including an <u>Evaluation Plan Template</u>.

# **3d.** National Days of Service

Programs must plan and implement at least one special community service project. 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 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 implements a National Day of Service project
- 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 (2 CFR 200.334). 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. At the beginning of each grant year, Nevada Volunteers provides a mandatory Start-Up Institute to review program requirements and changes to regulations for the upcoming program year. In addition, Program Directors are required to attend monthly or quarterly conference calls throughout the grant year.

# 3g. Required ASC Regional Training

Nevada Volunteers requires that program directors attend the annual ASC National Service 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, TQT, 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 90 days prior to the end date of the grant contract. Please complete the <u>No-Cost Extension Form</u> and notify your program contact that you are requesting a no-cost extension.

# 4: Member Management

# 4a. National Service Criminal History Checks, NSCHC

Programs must conduct and document a compliant National Service Criminal History Check NSCHC (<u>45 CFR</u> <u>2540.200-.207</u>, <u>NSCHC Manual</u>, (<u>NSCHC FAQ</u>) for all individuals in covered positions under AmeriCorps State and National operational grants (45CFR 2540.201). This check must be completed using the AmeriCorps approved vendors, Fieldprint and Truescreen, and approved by Nevada Volunteers before any member or staff funded by the AmeriCorps grant (CNCS share or match) begins work or service. Nevada Volunteers requires the use of the vendors Truescreen and Fieldprint for completion of these checks. For information on how to set-up your accounts with Truescreen and Fieldprint please reference the (<u>Using Truescreen and Fieldprint Manual</u>) found on the AmeriCorps website.

Each AmeriCorps program should develop a written policy about how criminal history checks will be handled at their agency, including any additional checks that may be run outside of the required checks below and the timeframe in which checks will be conducted. AmeriCorps provides <u>Recommendations for Effective NSCHC</u> <u>Policies and Procedures</u> and Nevada Volunteers can provide technical assistance to help develop and evaluate this policy. AmeriCorps has many additional resources on their <u>NSCHC Resources Page</u>.

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

- Documentation that the individual's identity was verified using a government-issued photo identification. (§2540.206)
- Obtaining written consent from candidates to perform all checks and share results (§2540.205), including
  - Documentation of candidate's understanding that his or her position is contingent on eligibility determined by the results of the NSCHC (§2540.205)
  - Documentation that the candidate understands his or her ability to review and challenge the factual accuracy of the result before action is taken to exclude the candidate from the position (§2540.205).

Nevada Volunteers has a <u>NSCHC Consent Form Template</u> you may use for this purpose.

- Using Truescreen to perform a nationwide name-based National Sex Offender Public Website check (NSOPW). This check must be complete and adjudicated the day before each candidate begins work or service. Records verifying this check must include verification that the government-issued photo ID matches the first and last name on the NSOPW, documentation that the results were reviewed and documentation of an eligibility determination made based on review of the results (adjudication) including name, timestamp and adjudication decision.
- Using Truescreen to perform a name-based search of the statewide criminal history registry in the candidate's state of residence if other than Nevada. This check must be complete and adjudicated the day before each candidate begins work or service. Records verifying this check must include documentation that the results were reviewed, and documentation of an eligibility determination made based on review of the results (adjudication) including name, timestamp and adjudication decision.
- Using Fieldprint to perform a fingerprint-based FBI check. This check must be complete and adjudicated the day before each candidate begins work or service. Records verifying this check must include documentation that the results were reviewed and an eligibility determination made (adjudication) including name, date, and adjudication decision.

- Filling out the <u>National Service Criminal History Check Verification Form</u> to document your NSCHC process for each individual (new and returning) and submitting to Nevada Volunteers, along with required attachments, for review and approval before an individual may start.
- Providing a reasonable opportunity for the person to review and challenge the factual accuracy of a result before action is taken to exclude the person from the position.
- Obtaining and maintaining documentation that the candidate is eligible to serve/work if a vendor check's adjudication recommendation does not endorse the candidate for service following the AmeriCorps Challenging a Not Cleared Recommendation guidance (45 CFR §2540.205). Documentation for Challenging the factual accuracy of a Not Cleared Recommendation:
  - Obtain a full fingerprint-based FBI criminal history report (via Agency approved source)
  - Review the full FBI criminal history information and any court or other additional documentation.
  - Contemporaneously dated memo to member file documenting the determination of individual's eligibility based on review of the above documents.
  - Filling out the National Service Criminal History Check Verification Form Not Cleared Recommendation.
- Taking reasonable steps to protect the confidentiality of any information relating to the criminal history check, consistent with authorization provided by the applicant.
- Maintain records and documentation of background check results, while maintaining confidentiality, for a period of 7 years (three years beyond the date of final closeout of the Nevada Volunteers Prime application under which programs were funded (45 CFR 2541.420)).

AmeriCorps takes NSCHC seriously and there are significant financial ramifications for noncompliance. Noncompliance with NSCHC may result in corrective action, cost-based disallowance, and manual hold of grant funds. NSCHC noncompliance may be considered as a factor in the agency's funding determinations and may impact an organization's future grant awards. In applicable cases, based on facts and circumstances, AmeriCorps may suspend or terminate the grant in response to NSCHC noncompliance.

AmeriCorps 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 180 days between terms do not require another criminal history check for the additional term. While additional criminal history checks for consecutive terms is not required, Nevada Volunteers does require programs to resubmit check components along with a new NSCHC verification form prior to member start in the consecutive term. 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.

A NSCHC is not required for individuals who are under the age of 18 on the first day of work or service in a covered position, or those whose activity is entirely included in the grant recipient's indirect cost rate. For

individuals under the age of 18 on the first day of service, Nevada Volunteers still requires a NSCHC Verification form to be submitted prior to member start.

# 4b. Prohibited Activities

AmeriCorps has placed a strong emphasis on monitoring for prohibited activities (Terms and Conditions and <u>45</u> <u>CFR 2520.65</u>). 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;
  - 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 AmeriCorps may prohibit.

In addition to the above activities, the below activities are additionally prohibited:

• Census Activities: AmeriCorps members and volunteers associated with AmeriCorps grants may not engage in census activities during service hours. Being a census taker during service hours is categorically prohibited. Census-related activities (e.g., promotion of the Census, education about the importance of the Census) do not align with AmeriCorps State and National objectives. What members

and volunteers do on their own time is up to them, consistent with program policies about outside employment and activities.

• Election and Polling Activities: AmeriCorps members may not provide services for election or polling locations or in support of such activities.

AmeriCorps members may not engage in the above activities directly or indirectly by recruiting, training, or managing others for the primary purpose of engaging in one of the activities listed above. Individuals may exercise their rights as private citizens and may participate in the activities listed above on their initiative, on non-AmeriCorps time, and using non- AmeriCorps funds. Individuals should not wear the AmeriCorps logo while doing engaging in any of the above activities on their personal time.

All locations where members serve should post a list of the prohibited activities, when possible.

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 AmeriCorps grants
- iv. Writing grant applications for funding provided by other federal agencies

## **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 recipient or sub recipient;
- The list of prohibited activities, including those specified in the regulations at 45 CFR § 2520.65;
- The text of 45 CFR §§ 2540.100(e)-(f), which relates to Nonduplication and Nondisplacement;
- The text of 45 CFR §§ 2520.40 and 45 CFR §§ 2520.45, which relates to fundraising by members;
- Requirements under the Drug-Free Workplace Act (41 U.S.C. §701 et seq.);
- Civil rights requirements, complaint procedures, and rights of beneficiaries;
- Suspension and termination rules;
- The specific circumstances under which a member may be released for cause;
- Internal Grievance procedures (note that the Member Service Agreement must include the Internal Grievance Procedure developed by the subgrantee and approved by Nevada Volunteers); and
- Other requirements established by the recipient.

Programs should ensure that the member service agreement is complete and signed on or before commencement of service, however the effective date will not be before the member is enrolled in the AmeriCorps Portal. Nevada Volunteers encourages all subgrantees to use our <u>MSA Template</u> to ensure Member Service Agreements include all required content.

### 4d. Member Files

Member files should follow the Nevada Volunteers <u>Member File Checklist</u>. Subgrantees must maintain records, including the position description, sufficient to establish that each member was eligible to participate, and that the member successfully completed all program requirements. A program may store member files electronically and use electronic signatures if the program can ensure the validity and integrity of the record and signature is maintained.

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 / Member Service Agreement
- 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 (PII)

#### **PII Definition**

The Federal Office of Management and Budget defines Personally Identifiable Information (PII) as any information about an individual, including, but not limited to, education, financial transactions, medical history, and criminal or employment history and information 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.

The State of Nevada defines Personal Information as a natural person's first name or first initial and last name in combination with any one or more of the following data elements, when the name and data elements are not encrypted:

- (a) Social security number
- (b) Driver's license number, driver authorization card number or identification card number

(c) Account number, credit card number or debit card number, in combination with any required security code, access code or password that would permit access to the person's financial account

(d) A medical identification number or a health insurance identification number

(e) A username, unique identifier or electronic mail address in combination with a password, access code or security question and answer that would permit access to an online account

Some information that is considered PII is available in public sources such as telephone books, public websites and university listings. This type of information is considered to be Public PII and as a stand-alone is not subject to the same protection and policy requirements. Public PII includes:

- 1. First and Last name
- 2. Address
- 3. Work telephone number

- 5. Home telephone number
- 6. General educational credentials
- Photos and video

4. Work e-mail address

It is important to remember that Non-PII can become <u>PII</u> whenever additional information is made publicly available, in any medium and from any source, that, when combined with other available information, could be used to identify an individual.

#### **PII Breach**

A breach of PII is the loss of control, compromise, unauthorized disclosure, unauthorized acquisition, or any similar occurrence where (1) a person other than an authorized user accesses or potentially accesses personally identifiable information or (2) an authorized user accesses or potentially accesses personally identifiable information for an other than authorized purpose. A breach is not limited to an occurrence where a person other than an authorized user soft a network intrusion, a targeted attack that exploits website vulnerabilities, or an attack executed through an email message or attachment. A breach may also include the loss or theft of physical documents that include PII and portable electronic storage media that store PII, the inadvertent disclosure of PII on a public website or via an insecure electronic communication (i.e., email), or an oral disclosure of PII to a person who is not authorized to receive that information.

**Breaches of PII must be reported to Nevada Volunteers as well as to the affected individual(s).** Types of breaches that must be reported include, but are not limited to the following: a. loss of control of employee or member information consisting of names and Social Security numbers; b. loss of control of PII pertaining to the

public; c. loss of control of security information (e.g., logons, passwords, etc.); d. incorrect delivery of PII; e. theft of PII, and f. unauthorized access to PII.

All subgrantees must have a PII policy in place as well as a process to prepare for and respond to breaches of PII. All electronic files that contain Protected PII must reside within a protected information system location. All physical files that contain Protected PII must reside within a locked file cabinet or room when not being actively viewed or modified. Protected PII is not to be downloaded to personal or organization owned employee, AmeriCorps service member, volunteer, or contractor workstations or mobile devices (such as laptops, personal digital assistants, mobile phones, tablets or removable media). PII cannot be sent through any form of insecure electronic communication E.g. E-mail or instant messaging systems. Significant security risks emerge when PII is transferred from a secure location to a less secure location or is disposed of improperly. When disposing of PII the physical or electronic file must be shredded or securely deleted. Nevada Volunteers has a <u>sample PII Policy</u> available for your use.

In the event of a breach of PII, AmeriCorps requires Nevada Volunteers to immediately notify our AmeriCorps Portfolio Manager and the AmeriCorps Office of Information Technology.

## 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 initiates the NSCHC including the NSOPW and FBI/State checks. Once the SSA has verified that the member is eligible, you must review the NSCHC results and determine if the member is eligible to serve. Once you have determined that the applicant has passed the NSCHC, fill out the <u>National Service Criminal History Check</u> <u>Verification Form</u> to document your NSCHC process for each individual and submit it to Nevada Volunteers, along with required attachments, for review and approval. Once Nevada Volunteers has approved your NSCHC, you can complete the enrollment form and the member can start service. Please see the <u>Pre-Enrollment</u> <u>Flowchart</u> for a step-by-step overview of this process.

To enroll members in eGrants, please refer to the <u>eGrants User Guide</u>, particularly the <u>Member Enrollment</u> <u>Guide</u>, for step-by-step instructions for this process in eGrants. Programs must document in the eGrants/My AmeriCorps Portal a member's enrollment within 8 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.

# 4g. Member Orientation

Programs must conduct a <u>member orientation</u> (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 AmeriCorps. 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 / Member Service Agreements (MSAs)
- 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. 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 amount of education awards. Programs should check the NOFO/RFP they applied to and associated with the program year for corresponding education award amounts. More information about the Segal AmeriCorps Education Award can be found <u>here.</u>

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, five years in AmeriCorps VISTA , and unlimited terms with AmeriCorps NCCC (although no more than 2 consecutive terms may be served before a required 10 month break).

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 and entered into the Portal must match the total approved hours in OnCorps and are 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 and member position description. If any member waives a program benefit, the program must maintain proper documentation of the waiver in the member file.

**Living Allowance:** 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. Living allowances must be distributed in equal amounts over the term of service regardless of time served or absences unless specified in the member service agreement. A living allowance distribution schedule must be determined by the program and specified in the member service agreement fulfilling the above requirements. For example, if full-time members are required to serve their terms in 10 months, the program must pay at least the minimum living allowance (e.g. \$12,630) over ten months (<u>Nevada Volunteers Living Allowance Distribution Policy</u>). 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 their term of service within the amount of time designated, and the program extends the member's term, the member must complete their service hours with no additional living allowance payments. All programs must develop a living allowance distribution policy and submit it to Nevada Volunteers each year during pre-award for review.

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).

**Healthcare:** 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 their 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 their 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 the AmeriCorps designated agents, in writing, when a member's status changes in a manner that affects their eligibility for healthcare. All full-time members must sign a waiver of this benefit if they decide not to utilize it.

**Childcare:** 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 childcare 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 AmeriCorps 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 <a href="https://www.americorpschildcare.com/">https://www.americorpschildcare.com/</a> 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 <a href="https://www.americorpschildcare.com/">Nevada</a>. More

Loan Deferment and Interest Forbearance: 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 <a href="https://my.americorps.gov/mp/login.do">https://my.americorps.gov/mp/login.do</a>. 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 their lending institution to determine whether they qualify.

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, AmeriCorps 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.

**Public Benefits:** In addition to the benefits outlined above, AmeriCorps members may be eligible for other public benefits including Food Assistance, WIC, TANF, HUD Housing Programs and more. Nevada Volunteers has developed a <u>Member Benefits Guide</u> that outlines many of these benefits and how eligibility for these benefits may or may not be impacted by participation in an AmeriCorps term of service.

# 4j. Member Timesheets

Nevada Volunteers requires that all programs use OnCorps as the official timekeeping system for members. 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.

Programs are required to ensure that time and attendance recordkeeping is conducted by AmeriCorps members. Time logs must be completed by members on a regular basis and submitted to both host site supervisors as well as program directors for approval in the OnCorps online timekeeping system. Once approved by Site Supervisors, **Program Directors must then review all timesheets and provide final approval of timesheets within 30 days of the end of the pay period.** 

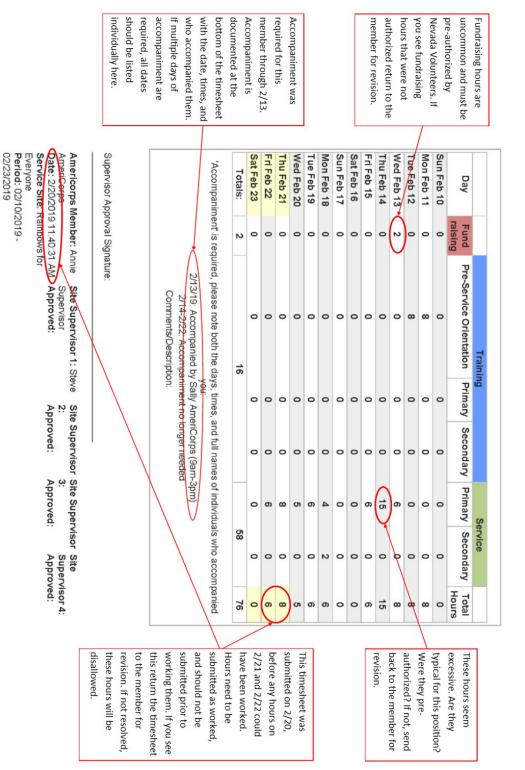
When reviewing timesheets it is important to look for the following warning signs and return to the member for revision as necessary:

- Time that is recorded based on scheduled amount vs actual time served
- Recorded hours that were not served
- Augmenting hours (i.e., showing 5 hours on a day they only served 3)
- Excessive hours that are above and beyond normal
- Same number of hours every day if that is not typical
- Hours not broken down into primary duties, secondary duties, training and fundraising (if hours were known to span multiple areas in the pay period)
- Hours submitted before they were served

Program directors are expected to review and approve all timesheets in OnCorps within 30 days of the end of the pay period. The first time a program's timesheets are not approved within 30 days of the end of the pay period, the program director will receive an email warning, outlining the outstanding approvals that need to be addressed. Repeated inability to approve timesheets on time and within 30 days of the end of the pay period may result in a letter of noncompliance or a site visit finding.

Notices of Noncompliance are sent to programs for repeated failure to meet expectations outlined in the subgrant agreement, including ensuring that member timesheets are approved 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.





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#### 4k. 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.

# 4I. Public Assistance Programs

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 for Needy Families (TANF). Nevada Volunteers has developed a <u>Member Benefits Guide</u> that outlines many of these benefits and how eligibility for these benefits may not be impacted by participation in an AmeriCorps term of service.

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 <u>CNCS Memo Regarding Eligibility</u> 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 (HHS) recognizes that AmeriCorps members, who will receive AmeriCorps healthcare coverage, may be receiving Medicaid coverage also. HHS 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

#### 4m. 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.

#### 4n. 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. Resources for supporting members with disabilities are available on the <u>Disability and Accessibility</u> section of the AmeriCorps website.

### 40. 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, they 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 that help them develop skills for life after AmeriCorps. This should include information such as including national service on resumes, interview training, and connecting members with AmeriCorps Alums.

#### **4p. Member Evaluations**

All full-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 full-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. In addition, end-of-term evaluations must document whether the participant successfully completed their term of service, was released for Compelling Personal Circumstances (CPC), or was released for cause (45 CFR 2522.220).

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.

# 4q. 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 AmeriCorps, must be adhered to by all AmeriCorps programs regarding refilling of member positions:

Programs may replace any member who terminates service before completing 30% of their 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 fulltime position if all of your other full-time positions are filled.
- Programs may not refill the same position more than once.

#### 4r. Member Status, Suspension and Early Release from Service

#### **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 <u>Member Change of Status Form</u> for your use to help ensure all steps of member status changes are documented. This form should be placed in the member's file and updated whenever a member change status.

#### Suspension

Suspension of service is defined as an extended period during which the member is not serving, nor accumulating service hours or receiving AmeriCorps benefits.

Members may be suspended for criminal charges, grievance, disciplinary reasons and compelling personal circumstances including temporary leave for reasons allowed under the Family Medical Leave Act. The same requirements pertain to suspension as they do for early member exit, for example, members cannot be suspended to serve a summer internship or study abroad. **Programs must have a suspension policy in place and terms related to suspensions should be outlined in member service agreements.** Suspensions should have a clear end date and programs should communicate to members regarding the terms of their suspension.

Suspended members are not eligible to receive any living allowance or AmeriCorps benefits while in suspension. Under no circumstances may any members under suspension receive hours toward their term of service.

#### Suspension for Disciplinary Reasons

A member may be temporarily suspended for minor disciplinary reasons, for failing to uphold the service requirements and standards of conduct agreed upon in the member service agreement. The period of suspension does not count toward a member's required service hours. Further, members who are suspended for minor disciplinary reasons may not receive a living allowance for the suspension period. In these cases, the program should specify the terms of the suspension, including the length of suspension and action steps that the member must take to be reinstated.

#### Suspension for Criminal Charges or Conviction

A member who is officially charged with a violent felony, or with the sale or distribution of a controlled substance during a term of service must have their service suspended without a living allowance and without receiving credit for hours missed. The member may be reinstated into AmeriCorps service only if they are found not guilty or if the charge is dismissed. If an AmeriCorps member who has been cleared of such charges is 17 and

unable to complete their term of service within one year, they may accept a pro-rated education award as long as they have completed at least 15% of their service. An AmeriCorps member who is convicted of a criminal charge as described above must be terminated for cause from the program, and they are not eligible for any portion of an education award.

#### Suspension for Compelling Personal Circumstances

As an alternative to releasing a member, a program may, after determining that compelling personal circumstances exist, suspend the member's term of service. Members may be suspended temporarily for compelling personal circumstances as outlined in <u>45 CFR 2522.230</u>, such as an accident or serious illness. The length of a suspension in this case must be balanced by the individual circumstances and the impact of the absence on the overall program and the member experience. If the anticipated period of suspension may seriously compromise the member's experience or the overall program quality, the program should consider offering the member the option of exiting for compelling personal circumstances. If suspension is authorized for reasons allowed under the Family Medical leave ACT (FMLA) continuation of health care benefits may be an allowable grant cost. If your organization has more than 50 employees and is eligible for FMLA, please contact your AmeriCorps program contact at Nevada Volunteers to ensure your policy is FMLA compliant.

#### Suspension Related to Grievance

Members released for cause may contest the program's decision by filing a grievance. Pending the resolution of a grievance procedure filed by an individual to contest a determination by a program to release the individual for cause, the individual's service should be suspended. For this type of grievance, a program may not—while the grievance is pending or as part of its resolution—provide a participant with federally-funded benefits (including payments from the National Service Trust) beyond those attributable to service actually performed, without the program receiving written approval from AmeriCorps.

#### Documentation of Suspension

If programs suspend a member's service, whether for cause or for compelling personal circumstances, the reason for the suspension 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 member files (which should be secured and confidential). If the documentation is medical in nature, it must be stored separately in a secure medical file and not in the member file. Notification of anticipated member suspensions and returns to service following suspension should be documented on the Member Change of Status Form and communicated to Nevada Volunteers.

#### **Early Release from Service**

Members may be released early from their term of service for compelling personal circumstances or for cause.

#### **Compelling Personal Circumstances**

Members are released for compelling personal circumstances if they have completed at least 15% of their term of service, have otherwise performed satisfactorily, and are unable to complete the term of service because of compelling personal circumstances as outlined in 45 CFR 2522.230. Members released for compelling personal circumstances qualify for a pro-rated education award, and the position <u>is not</u> available to be refilled. 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. AmeriCorps and its auditors may review these circumstances as part of their oversight and monitoring responsibilities.

#### Cause

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. Additionally, 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, and their slot can be refilled if the program is otherwise fully enrolled and the exiting member has served less than 30% of their term of service.

It is possible for a member to be released 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 they performed satisfactorily during the term of service from which they were 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.

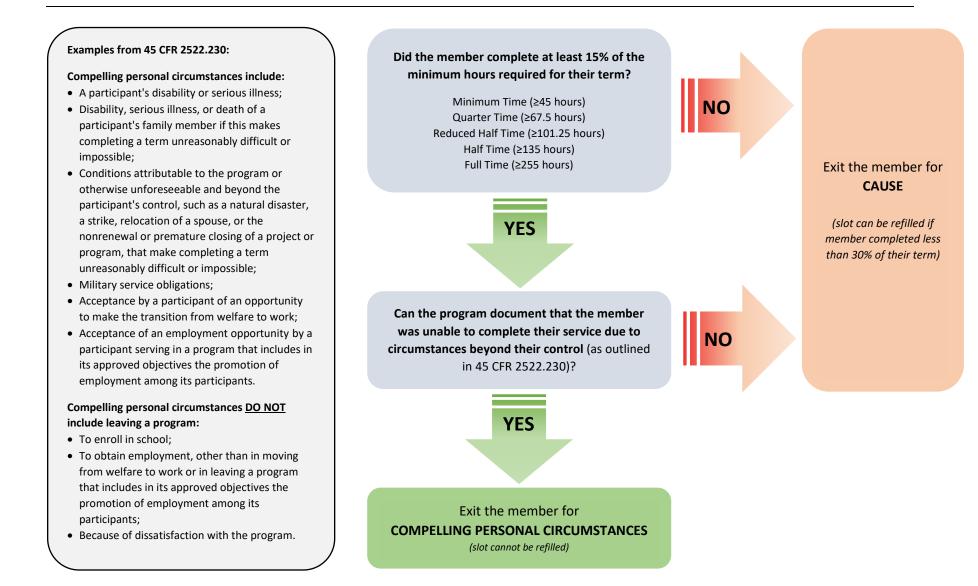
# Prior to exiting a member early in eGrants/MyAmeriCorps Portal for Compelling Personal Circumstance or for Cause please do the following:

- Review <u>45 CFR 2522.230</u>
- Review the Compelling Personal Circumstances Flowchart on the following page
- Determine if you will be exiting the member for Compelling Personal Circumstances or for Cause
- Fill out a Member Change of Status Form
- If suspending a member or exiting a member early for Compelling Personal Circumstances, email a copy of the change of status form to Nevada Volunteers
- Call Nevada Volunteers at any time if you have questions!

**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.

# **Compelling Personal Circumstances**

How to determine if an AmeriCorps Member can be released for compelling personal circumstances



# 4s. 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 they earn an education award and may affect their 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	Ν	Y	Cause	Not Eligible for Award	Eligible- Must Disclose Prior Release for Cause
N	Ν	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 AmeriCorps. As the program is managing the member exit process, they should be mindful of AmeriCorps 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.

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. If exiting a member from suspension, the member must be reinstated and exited on the day in which the decision to exit was made.

If exiting a member early, please follow the steps under 4t. Early Exit prior to initiating the exit in eGrants. If unsure what to do, a member can be placed in suspension until a final exit decision is made.

# 5: Financial Management

The grantee has full fiscal and programmatic responsibility for managing all aspects of grant and grantsupported 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 <u>Title 2 of the Code of Federal Regulations</u>. This Uniform Guidance took effect on December 26, 2014. AmeriCorps grants are also subject to the <u>General</u> and <u>Specific</u> Terms and Conditions, state and local regulations, the NOFO and your AmeriCorps Subgrant Agreement. Terms and Conditions are the guiding principles for AmeriCorps-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 AmeriCorps, 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 third party in-kind donations from partners (including goods, services, and use of goods or building space, as stipulated in 2 CFR 200.306) as well as costs covered by your organization. Note that cash salaries cost incurred by your organization must be documented as noted in 2 CFR 200.430(i).
- A system must be developed to track your cash match.

- A policy must be developed to ensure that member living allowances are paid as a stipend with the same increments being paid to each member of the same service term and position each pay period. Living allowances can be pro-rated at the start and end of a term of service but pro-rated policies must be approved by Nevada Volunteers. Please reference the <u>Nevada Volunteers Living Allowance</u> <u>Distribution Policy</u> when developing your policy.
- AmeriCorps staff members' time and related expenses may not be charged to the AmeriCorps (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:
      - o 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 or be an allowable budget change
  - be given consistent treatment as direct or indirect, in accordance with 2 CFR 200.412
  - 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 (see 2 CFR 200.407).

It is 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 AmeriCorps is required. If AmeriCorps approval is required, Nevada Volunteers will draft an AmeriCorps approval request and will send it to our AmeriCorps Portfolio Manager for review of budget modifications.

Programs must obtain the prior written approval of Nevada Volunteers and AmeriCorps 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 \$5000 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.

	Year									
	1	2	3	4	5	6	7	8	9	10 (+)
Minimum Overall Share	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, AmeriCorps 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, AmeriCorps will consider the following list of county-level characteristics.

- The county-level per capita The county-level poverty rate
- The county-level unemployment rate, and
- The areas served by the program lack basic infrastructure such as water or electricity

If your program is located in one of these areas, please contact your AmeriCorps program contact. A request will need to be sent to AmeriCorps through Nevada Volunteers 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 AmeriCorps 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 with prior approval from Nevada Volunteers). 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 yearto-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 AmeriCorps through eGrants and the Health and Human Services (HHS) systems on the Federal Financial Report (FFR). The FFR includes aggregate information for all Nevada Volunteers funded AmeriCorps programs. Aggregate Financial Reports (AFRs) 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. For grants under a no cost extension, a final AFR 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, AmeriCorps sends Nevada Volunteers requests for estimates of unexpended funds. AmeriCorps uses this information to determine if Nevada Volunteers has any anticipated unexpended funds to be returned to AmeriCorps or reallocated. To obtain the necessary information to report to AmeriCorps, Nevada Volunteers requires every program to complete an <u>Unexpended</u> <u>Funds Report</u> with their Q2 reporting. Programs should report as accurately as possible anticipated unexpended funds at the time the report is due. Funds reported to be unexpended will be deobligated.

# 5g. Grant Closeout

Nevada Volunteers requires all subgrantees to complete the <u>Closeout Checklist and Certification Form</u> each year within 60 days of the close of the budget period. 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 Residual and Unused 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. (2 CFR 200.314)

Unexpended Funds - If a program has drawn funds under the grant but not expended them, the program will need to return the funds to AmeriCorps. 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 AmeriCorps, 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 AmeriCorps 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 AmeriCorps 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 their new grant application annually.

# 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: <u>New and High-Risk Programs</u>, <u>Low and Mid-Risk Programs</u>, for a comprehensive list 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, 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
- National Service Criminal History Check requirements
- PER reporting and supplemental documentation requirements
- AFR reporting requirements
- Cost allowability

- Fiscal policies
- Fiscal practices

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

Nevada Volunteers staff, at a minimum, make a site visit to every program once every three years 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.

- Programmatic Monitoring Tool
- Financial Monitoring 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.

	Low/Mid Risk	High-Risk/New
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 or Desk Review	As needed	Annually
Programmatic Monitoring Site Visit	Every 3 years	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. 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. See section 5e., Fiscal Reporting for more detailed information and deadlines for submission of reimbursement requests.

#### **6d. Travel Reimbursement**

Nevada Volunteers provides travel reimbursement for AmeriCorps subgrantees when participating in grant related pre-approved travel. The below steps must be followed when requesting a travel reimbursement.

- 1) Fill out a travel request/authorization form
- 2) Submit your travel request/authorization form to Nevada Volunteers **at least 2 months prior** to your requested travel.
- 3) Nevada Volunteers will return your travel request within two weeks
- 4) Book your travel. Travel should be booked at least 6 weeks prior to the training, conference or event you plan to attend.
- 5) After your travel, fill out your travel reimbursement form and submit to Nevada Volunteers
- 6) Reimbursement for travel will be paid by Nevada Volunteers on the 10<sup>th</sup> or the 25<sup>th</sup> following the submission and approval of your travel reimbursement.

#### **Travel Request/Authorization**

Prior to your travel you must submit a <u>Travel Request/Authorization Form</u> to Nevada Volunteers. This form requires you to identify the purpose of your travel and estimate all fees associated with your travel from airfare and lodging to conference/event fees, meals, and transportation. When filling out your travel request please do your best to accurately reflect expected costs by researching expenses and using Federal per diem rates set by the General Service Administration (GSA rates) where applicable. Current GSA rates can be found at <u>https://www.gsa.gov/travel/plan-book/per-diem-rates</u>. Please ensure you are using the GSA rate for the year in which your travel takes place, and for the city/state where you will be traveling to. Expenses that are above GSA rates require written explanation and prior approval.

# Travel Request/Authorization forms should be submitted to Nevada Volunteers at least 2 months prior to your requested travel.

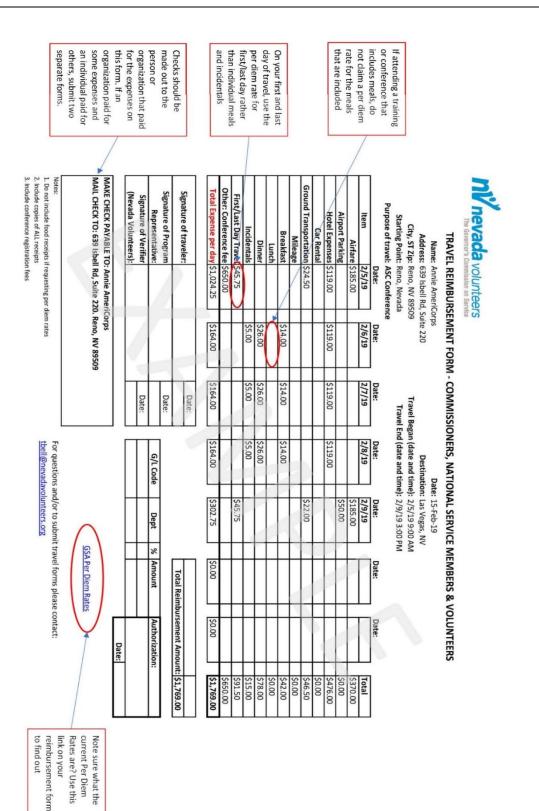
Nevada Volunteers will review and return your travel request within 2 weeks. Please make sure you submit your travel request early enough to allow adequate time to book your travel.

#### **Travel Reimbursement Form**

After your travel is complete, fill out your <u>Travel Reimbursement Form</u> with the actual costs and/or per diem rates for the expenses that were incurred for your travel (Airfare, parking, hotel, rental car, ground transportation, mileage, meals). Per diem rates should be used in lieu of actual expenses for all meals and incidentals. On the first and last day of travel, the per diem rate for first/last day of travel should be used in place of any meal or incidental per diems. If your trip includes any meals already paid for by conference and/or registration fees, these meals must not be included on your reimbursement request. All expenses other than those where a per diem rate was used must be verified with a receipt. If expenses are paid by more than one party (for example, your organization pays for your airfare, but you pay for your ground transportation and meals) a separate reimbursement form should be filled out for each party with the expenses they incurred. Once a travel reimbursement form is complete, please submit to Nevada Volunteers along with accompanying receipts for reimbursement. Reimbursement requests will be reviewed and paid by the 10<sup>th</sup> or the 25<sup>th</sup> following receipt and approval of the request. An example of a completed travel reimbursement form is available on the next page.

#### **Mileage Reimbursement**

Mileage reimbursement can be included on your travel reimbursement form. Please use the <u>current GSA</u> <u>mileage reimbursement rate</u> and attach a google map indicating the starting point, ending point, and total mileage.



# **Example Travel Reimbursement Form**

# 6e. 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 or quarterly. 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 Basecamp 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.

## **6f. 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.