

Office of Monitoring

Overview of Uniform Monitoring Package

Grantee Resource Guide

February 26, 2024

Please refer to <https://americorps.gov/grantees-sponsors/monitoring> to ensure you have the most recent version of this document.

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

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

Crosswalk of UMP with Federal Regulations and Compliance Requirements

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

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

This resource will be updated, as needed. AmeriCorps has the right, at all reasonable times, to incorporate revisions to its monitoring tools and to include additional areas of assessment for compliance monitoring.

Monitoring Activity Types:

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

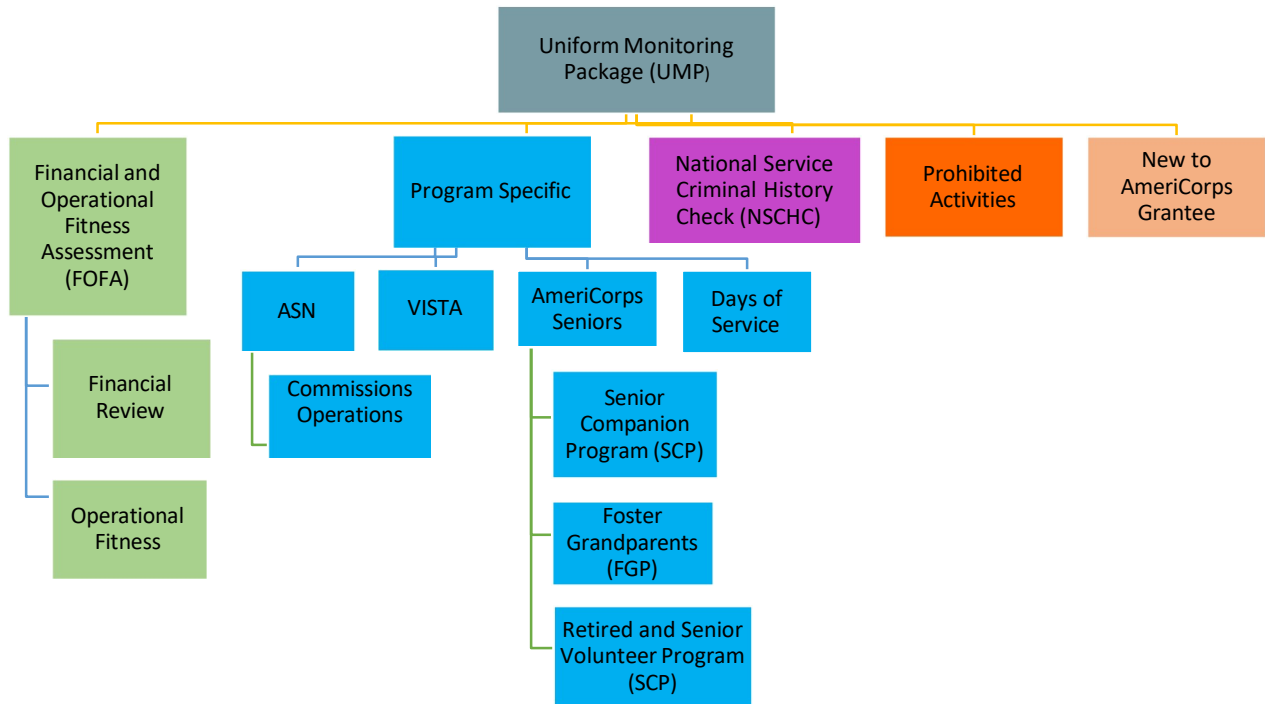


Figure 1: An image of the AmeriCorps Office of Monitoring Uniform Monitoring Package Activities.

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Monitoring Activity - Financial and Operational Fitness (FOFA)

Financial and Operational Fitness (FOFA)

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

01.01: REPORTING

01.01.01	Review the sponsor's/grantee's general ledger or other tracking sheet of grant expenses for the period in question. Does the amount reported in line E ("Federal share of expenditures") of the Federal Financial Report (FFR) for the review period reconcile with the sponsor's/grantee's financial records?	
References:	2 CFR 200.328, 2 CFR 200.302	
Notes:		
Recommendations for Improvement:		
01.01.02	Review the sponsor's/grantee's chart of accounts. Can the sponsor/grantee segregate revenue and expenses by project or grant?	
References:	2 CFR 200.328, 2 CFR 200.302	
Notes:		
Recommendations for Improvement:		
01.02: MATCH/RECIPIENT SHARE		
01.02.01	Does the sponsor/grantee have a written policy that addresses how it treats match?	
References:	2 CFR 200.306	
Notes:		
Recommendations for Improvement:		
01.02.02	If there is a written policy, does it include the following minimum elements?	
	• address how match is tracked and reported,	
	• specify that it comes from a non-federal source (or, if it is from another federal source, it follows AmeriCorps guidance and is approved by the funding agency),	
	• shows how in-kind donations are valued and recorded at fair market value.	
References:	2 CFR 200.306	
Notes:		

FOFA

Recommendations for Improvement:		
01.02.03	Review the sponsor's/grantee's general ledger or other tracking sheet of match expenses for the period in question. Does the amount reported in line J ("Recipient share of expenses") of the Federal Financial Report (FFR) for the review period reconcile with the sponsor's/grantee's financial records?	
References:	2 CFR 200.306	
Notes:		
Recommendations for Improvement:		
01.03: DIRECT COST ALLOCATION METHODOLOGY		
01.03.01	Does the sponsor/grantee have a written methodology that adequately describes how direct costs are allocated on a reasonable basis? If NO, note how costs are allocated below.	
References:	2 CFR 200.405, 2 CFR 200.413	
Notes:		
Recommendations for Improvement:		
01.03.02	If there is a plan, does it meet the following criteria?	
	• The plan is current.	
	• The plan has a method that is reasonable and not based on budgeted percentages.	
References:	2 CFR 200.405, 2 CFR 200.413	
Notes:		
Recommendations for Improvement:		
01.03.03	Does the sponsor/grantee have written procedures for determining the allowability of costs that are in alignment with Uniform Guidance and the Terms and Conditions of their grant?	
References:	2 CFR 200.302(b)(7), 2 CFR 200.403, 2 CFR 200.404, 2 CFR 200.405, AmeriCorps Annual General Terms and Conditions	
Notes:		
Recommendations for Improvement:		
01.04: INDIRECT COST RATE		

FOFA

01.04.01	Does the approved budget include indirect costs?	
References:	2 CFR 200.413, 2 CFR 200.414, 2 CFR 200.416, 2 CFR 200.418	
Notes:		
Recommendations for Improvement:		
01.04.02	If YES to question 01.04.01, review the approved negotiated rate or cost allocation plan (state and local governments can use a cost allocation plan).	
References:	2 CFR 200.413, 2 CFR 200.414, 2 CFR 200.416, 2CFR 200.418	
Notes:		
Recommendations for Improvement:		
01.04.03	Review the sponsor/grantee’s cost allocation plan, financial policies, and/or provided list of costs included as indirect costs and note which costs they consider indirect. Review the approved budget to ensure these costs are not included as direct cost line items. Costs cannot be simultaneously included in the direct budget and included in the indirect cost rate.	
References:	2 CFR 200.413, 2 CFR 200.414, 2 CFR 200.416, 2CFR 200.418	
Notes:		
Recommendations for Improvement:		
01.05: CASH MANAGEMENT		
01.05.01	Does the sponsor/grantee have a policy and procedure to manage Federal cash drawdowns?	
References:	2 CFR 200.305	
Notes:		
Recommendations for Improvement:		
01.05.02	If there is a policy and procedure to manage cash drawdowns, do they include the following minimum elements?	
	• Cash is drawn on a reimbursement or ‘as-needed’ basis, and note held in excess of three (3) working days	
	• Procedural steps that outline the approval and drawdown process, including who is responsible for each action	
References:	2 CFR 200.305, PMS Payment Certification	
Notes:		
Recommendations for		

FOFA

01.05.03	Does the grantee follow the policy or procedures established in their Federal Cash Management policy? Review the supporting documentation for the requested Payment Management System drawdown(s) to ensure that the calculations and process used are in alignment with the grantee's written policies.	
References:	2 CFR 200.305, PMS Payment Certification	
Notes:		
Recommendations for Improvement:		
01.05.04	When viewing the Payment Management System summary of payments for this grant and the associated supporting documentation for selected drawdown samples, do drawdowns appear to be made in an allowable manner? Specifically, did the tested costs demonstrate that drawdowns were based on actual expenses that -	
	<ul style="list-style-type: none"> • were incurred before or within three working days of the associated drawdowns; and, • were allocable, allowable, reasonable and adequately documented? 	
References:	2 CFR 200.305, PMS Payment Certification	
Notes:		
Recommendations for Improvement:		
01.06: Cost Testing		
01.06.01	Are the sampled costs free of issues/errors? If NO, document issues in the Cost Testing Worksheet.	
References:	2 CFR 200.303, 2 CFR 200.420 – 476 General Provisions for Selected Items of Cost	
Notes:		
Recommendations for Improvement:		
01.07: Internal Controls		
01.07.01	Review the Segregation of Duties Worksheet filled out by the sponsor/grantee and complete the required interviews with prime staff.	
References:	2 CFR 200.303	
Notes:		
Recommendations for Improvement:		
01.07.02	Do the sponsor's/grantee's written financial polices explicitly state the internal controls in place, consistent with the worksheet's results, required staff interviews and cost testing observations?	

FOFA

References:	2 CFR 200.303	
Notes:		
Recommendations for Improvement:		
01.07.03	Has at least one staff member completed the required Key Concepts of Financial Grants Management Training in the last year?	
References:	AmeriCorps Annual Program Specific Terms and Conditions	
Notes:		
Recommendations for Improvement:		
01.08: Record Retention		
01.08.01	Does the sponsor/grantee have a written policy for retention of financial records and supporting documentation for three years from the date of the submission of the final FFR, or when any final action is	
References:	2 CFR 200.334	
Notes:		
Recommendations for Improvement:		
01.09: Time Keeping		
01.09.01	Is the grantee compliant with the Standards for Documentation of Personnel Expenses (e.g. Timekeeping)?	
	<ul style="list-style-type: none"> Charges to the grant for salaries and wages are based on records (e.g. timesheets) that accurately reflect the work performed. These records must: <ul style="list-style-type: none"> Be supported by a system of internal control that provides reasonable assurance that charges are accurate, allowable, and properly allocated. Incorporated into the official records of the organization Reasonably reflects the total activity for which employee is compensated Comply with the grantee's accounting policies and practices For an employee who is billed less than 100% to the grant, salary or wages are allocated to specific activities or cost objectives 	
References:	2 CFR 200.430, 2 CFR 200.430(i), 2 CFR 200.431, 2 CFR 200.413(c), 2 CFR 200.416	
Notes:		

FOFA

Recommendations for Improvement:		
01.10: Procurement		
01.10.01	Does the sponsor/grantee have a procurement policy?	
References:	2 CFR 200.317-327	
Notes:		
Recommendations for		
01.10.02	If there is a policy, does it include the following minimum elements?	
	• Standards of conduct that cover at minimum conflicts of interest and disciplinary actions to be applied for violations of such standards	
	• Delineation of purchase thresholds, • Single source provisions, and	
	• Necessary affirmative steps to assure minority businesses, women's business enterprises, and labor surplus area firms are used when possible	
References:	2 CFR 200.317-327	
Notes:		
Recommendations for Improvement:		
Additional Monitoring Comments		

Monitoring Activity - ASN Programmatic

Program-Specific (ASN)

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

03.01: ASN MEMBER MANAGEMENT - ASN Programmatic

03.01.01	Is there evidence that Member eligibility documentation was reviewed and found satisfactory prior to enrollment?	
	• Proof of citizenship or allowable legal status;	
	• Proof of age;	
	• Member certification of GED or HS diploma or statement that Member agrees to earn one prior to using the Education Award.	
References:	45 CFR § 2520.40 Grant Program Specific Terms and Conditions	
Notes:		
Recommendations for Improvement:		
03.01.02	Is there evidence the grantee grant-funded activities are compliant with Non-Supplantation, Non-Duplication and Non-Displacement restrictions?	
	The commission/direct ensures grant-funded activities are compliant with;	
	• Non-supplantation	
	• Non-duplication	
References:	45 CFR § 2540.100	
Notes:		
Recommendations for Improvement:		
03.01.03	Member fundraising time is limited to 10% of the maximum allowable number of service hours, and member training is limited to 20% or less of the total aggregate agreed-upon member service hours in the program.	
	Does the program have a process for ensuring member hours are tracked and fundraising time does not exceed the 10% limit?	
	Does the program have a process for ensuring member hours are tracked and member education and training do not exceed the 20% limit?	
References:	45 CFR § 2520.45 45 CFR § 2520.50	
Notes:		

ASN

Recommendations for Improvement:		
03.01.04	Are all activities included in the Member Position Description compliant?	
References:	General Grant Terms and Conditions; 45 CFR 2520.65, 45 CFR 2520.40, 45 CFR 2520.45	
Notes:		
Recommendations for Improvement:		
03.01.05	Do the service activities of the member align with the position description?	
References:	Grant Program Specific Terms and Conditions (AC V A)	
Notes:		
Recommendations for Improvement:		
03.01.06	Is there a designated supervisor providing regular and consistent support and supervision for each Member?	
References:	Grant Program Specific Terms and Conditions (AC V D)	
Notes:		
Recommendations for Improvement:		
03.01.07	Have supervisors completed member management training to effectively manage AmeriCorps Members?	
References:	Grant Program Specific Terms and Conditions (AC V D)	
Notes:		
Recommendations for Improvement:		
03.01.08	Does the grantee recognize AmeriCorps support?	
	<ul style="list-style-type: none"> • Are projects visually identified as AmeriCorps (including, but not limited to logos, websites, social media, service gear and clothing) and following AmeriCorps brand guidelines? • Are members provided information that projects are part of AmeriCorps? • Are there alterations to AmeriCorps logos or other brand identities? If yes, did the grantee receive prior written approval from AmeriCorps? • If applicable, do agreements with subsites explicitly state the program is an AmeriCorps program? 	
References:	General Terms and Conditions	
Notes:		

ASN

Recommendations for Improvement:		
03.01.09	Does the progress report raw/source Documentation provided demonstrate accuracy and validity of performance measure progress reported? If NO, write a brief explanation in the notes section below.	
References:		
Notes:		
Recommendations for Improvement:		
03.02: ASN Program Financial Review		
03.02.01	If the grant is a fixed price award, (Professional Corps, Full-time, or EAP) does the grantee have a policy to manage the calculation and drawdown of fixed price awards?	
References:	Fixed Amount Grant Financial and Administrative Process Guide (Edition 2.10, September 13, 2018).	
Notes:		
Recommendations for Improvement:		
03.02.02	If there is a policy, does it include the following elements in line with the 2018 Fixed Price Financial Process Guide provided by AmeriCorps? <ul style="list-style-type: none"> • Advances of fixed amount grant funds are not permitted outside of express written approval from AmeriCorps • Show drawdowns are determined for the type of fixed amount award in use: <ul style="list-style-type: none"> o For Professional Corps and Full-time awards: Earned funds are based on the hours served by enrolled members o For EAP awards: Earned funds are based on the number of members enrolled, adjusted by slot type. 	
References:	Fixed Amount Grant Financial and Administrative Process Guide (Edition 2.10, September 13, 2018).	
Notes:		
Recommendations for Improvement:		
03.03: Verification of Terms and Conditions		
03.03.01	Is there documentation to show that the recipient maintains a procedure for the filing and adjudication of grievances in alignment with 45 CFR § 1225? Documentation should outline the following at minimum: <ul style="list-style-type: none"> • Time frames for filing and response • Person who receives and responds to the complaints both informal (grantee personnel) and formal (EEO Director of AmeriCorps or AmeriCorps designee) • Documentation required • Legal representation is allowed 	

ASN

	<ul style="list-style-type: none"> • Freedom from retaliation/reprisal • The process involved from initial filing, review, decisions made, corrective action, through close out 	
References:	45 CFR 1225	
Notes:		
Recommendations for Improvement:		
03.03.02	<p>Does the organization have a non-discrimination policy that includes all the federally required protected classes as listed below?</p> <p>*NOTE: Updated in the AmeriCorps Program Civil Rights and Non-Harassment Policy 11/7/23. Compliance should be determined based on grant award requirements.</p>	
	<ul style="list-style-type: none"> • Race • Color • National origin • Gender/gender identity or expression/sex • Age • Religion • Sexual orientation • Disability • Political affiliation • Marital or parental status • Reprisal* • Genetic information • Military service • Pregnancy* • Submission of a complaint* 	
References:	AmeriCorps Annual General Terms and Conditions	
Notes:		
Recommendations for Improvement:		
03.03.03	<p>Based on information available to AmeriCorps, in the last two years, did the grantee document grievances and/or discrimination/harassment complaints and the corresponding follow up/response in compliance with applicable federal statutes as embodied in the program regulations?</p> <p>Has the sponsor or any of the service sites/volunteer stations had grievances and/or discrimination/harassment complaints filed against them regarding services provided under this grant or had civil rights compliance reviews regarding services conducted?</p> <p>Has the grantee or any service site had grievances and/or /discrimination/harassment complaints filed against them?</p>	
	<ul style="list-style-type: none"> • Was the grievance and/or discrimination/harassment complaint or non-compliance substantiated? • Was relief or remedial action taken? (Please describe) 	

ASN

References:	45 CFR 1225, AmeriCorps Annual General Terms and Conditions, 45 CFR 2540	
Notes:		
Recommendations for Improvement:		
03.03.04	Does the grantee/sponsor have a policy and procedure in place regarding the provision of reasonable accommodation for members and staff to ensure accessibility as per the federal requirements?	
References:	45 CFR 1203/1214/1232, Rehabilitation Act of 1973: Sections 504, 508	
Notes:		
Recommendations for Improvement:		
03.03.05	Does the sponsor/grantee have a system (a plan or process) in place for ensuring accessibility to persons with Limited English Proficiency?	
References:	AmeriCorps Annual General Terms and Conditions, Executive Order 13166, 67 FR 64604, Title VI, Civil Rights Act 1964: Prohibition Against National Origin Discrimination Affecting Limited English Proficient	
Notes:		
Recommendations for Improvement:		
03.03.06	Does the grantee notify members, community beneficiaries, applicants, program staff, and the public, including those with impaired vision or hearing, that it operates in accordance with federal and program requirements on non-discrimination and non-harassment?	
	a. Does the policy summarize the requirements, note the availability of compliance history information, and explain the procedures for filing discrimination complaints with AmeriCorps?	
	b. Does the policy include information on civil rights and non-harassment requirements, complaint procedures and the rights of beneficiaries in member/volunteer service agreements, handbooks, manuals, pamphlets, and posted in prominent locations, as appropriate?	
	c. Does the sponsor/grantee notify the public in recruitment material and application forms that it operates its program or activity subject to nondiscrimination requirements?	
References:	AmeriCorps Annual General Terms and Conditions, 45 CFR Parts 2540	
Notes:		
Recommendations for Improvement:		
Additional Monitoring Comments		

Monitoring Activity - Commission Operations

Commission Operations

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

13.01: Subrecipient Foundations

13.01.01	Does the Commission have current, completed subrecipient agreements on file for the sampled subrecipients?	
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References:	2 CFR §200.332	
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Notes:		
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Recommendations for Improvement:		
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13.01.02	Does the agreement contain all required elements listed below?	
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• Federal award identification	
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• Subrecipient name (which must match the name associated with its unique entity identifier);	
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• Subaward Period of Performance Start and End Date;	
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• Subaward Budget Period Start and End Date (if different from performance period)	
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• Total amount of federal funds obligated and committed to the subrecipient by the pass-through entity including the current financial obligation	
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• Federal award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA)	
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• Name of Federal awarding agency, pass-through entity, and contact information for awarding official of the Pass-through entity	
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• Indirect cost rate for the Federal award (including if the de minimis rate is charged) per § 200.414	
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• Description of requirements imposed by the pass-through entity on the subrecipient so that the award is used in accordance with Federal statutes, regulations and the T&C's of the Federal award;	
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• The approved federally recognized indirect cost rate negotiated between the subrecipient and the Federal Government. If no approved rate exists, the pass-through entity must determine the appropriate rate in collaboration with the subrecipient	
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• Description of the requirement that the subrecipient permit the pass-through entity and auditors to have access to the subrecipient's records and financial statements as necessary for the pass-through entity to meet the requirements of this part	
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• Description of the appropriate terms and conditions concerning closeout of the subaward (or if not explicitly listed in agreement, is the instruction clearly listed elsewhere? MO should identify the documentation where this is found, if not in agreement)	
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References:	2 CFR §200.332 (a), 2 CFR §200.344	
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Notes:		
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Recommendations for Improvement:		
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13.01.03	Does the Commission assess each subrecipient's risk of noncompliance for the purpose of determining the appropriate subrecipient monitoring?	
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Has the Commission completed risk assessment packages for the sampled subrecipients?	
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Commission Operations

	Has the Commission identified a way to tailor monitoring for subrecipients based on their risk assessments?	
References:	2 CFR 200.332 (b)	
Notes:		
Recommendations for Improvement:		
13.01.04	Is there evidence in the Commission's monitoring materials (monitoring policy, plan, packages, tools) that they monitor the following items and topics?	
	Required financial and performance reports (does the commission monitor for subrecipients' accuracy and validity in FFR data?)	
	Subrecipients' resolution of any findings or issues uncovered during an audit, site visit, or by other means	
	NSCHC records, if NSCHC's are conducted at the subrecipient level	
	Expenditures (does the Commission regularly review source documentation for expenditures to ensure they are allowable, allocable, and reasonable?)	
References:	2 CFR 200.332(d)	
Notes:		
Recommendations for Improvement:		
13.01.05	Does the Commission track its subrecipients' audit requirements?	
References:	2 CFR §200.332 (f), 2 CFR § 200.501(a)	
Notes:		
Recommendations for Improvement:		
13.01.06	If any subrecipients had any findings with financial implications in their audit or during the course of subrecipient monitoring by the Commission, did the Commission adjust its internal records to reflect the	
References:	2 CFR 200.332(g)	
Notes:		
Recommendations for Improvement:		
13.01.07	Does the recipient make individual subawards in amounts greater than \$30,000?	
References:	AmeriCorps General Terms and Conditions	
Notes:		
Recommendations for Improvement:		

Commission Operations

13.01.08	If subawards are made in amounts greater or equal to \$30,000, is each subaward reported through http://www.fsrs.gov?	
References:	AmeriCorps General Terms and Conditions	
Notes:		
Recommendations for Improvement:		
13.02: Selection and Post Award		
13.02.01	Does the Commission administer a competitive process to select national service programs for funding?	
References:	45 CFR 2550.80(b)(2)	
Notes:		
Recommendations for Improvement:		
13.02.02	Does the Commission use all the required criteria when selecting formula programs?	
	The quality of national service program proposed to be carried out directly by the applicant or supported by a grant from the applicant	
	The sustainability of the national service program	
	The quality of the leadership of the national service program, the past performance of the program, and	
	The extent to which participants of the national service program are recruited from among residents of	
	The extent to which projects would be conducted in distressed communities, specifically in one of the areas listed in 45 CFR 2522.450 (c)(1) through (5)	
References:	45 CFR 2522.475	
Notes:		
Recommendations for Improvement:		
13.02.03	Does the Commission make a reasonable effort to fulfill its responsibility to develop mechanisms for recruitment and placement of people interested in participating in national service programs (as required by 45 CFR 2550.80 (h))?	
References:	45 CFR 2550.80 (h)	
Notes:		
Recommendations for Improvement:		
13.02.04	Does the Commission provide guidance to subrecipients around member supervision requirements -- in particular that each member is assigned a supervisor to provide consistent support? If yes, describe where this guidance is outlined.	
References:	Grant-Specific Terms and Conditions section (V)(D)	

Commission Operations

Notes:		
Recommendations for Improvement:		
13.02.05	Does the Commission ensure that supervisors of AmeriCorps members in the field complete training specific to overseeing AmeriCorps members? If yes, specify the documentation that supports the finding in the notes section.	
References:	Grant-Specific Terms and Conditions section (V)(D)	
Notes:		
Recommendations for Improvement:		
13.02.06	Does the Commission recognize AmeriCorps support by visually identifying projects as AmeriCorps (including some combination of, but not limited to logos, websites, social media, service gear and clothing) in accordance with AmeriCorps brand guidelines?	
References:	General Terms and Conditions – “Acknowledgment of Support” , Branding Guidelines	
Notes:		
Recommendations for Improvement:		
13.03: Portfolio Management		
13.03.01	Is there evidence of duplication, supplantation, or displacement within the Commission or its subgrantees, observable through document reviews or interviews?	
	Evidence of duplication?	
	Evidence of supplantation?	
	Evidence of displacement?	
References:	45 CFR §2540.100	
Notes:		
Recommendations for Improvement:		
13.03.03	Are all activities included in the sampled member position descriptions allowable?	
References:	45 CFR 2520.65, 45 CFR 2520.10 through 2520.30	
Notes:		

Commission Operations

Recommendations for Improvement:		
13.03.04	Do the service activities of the member align with the position description, based on member and supervisor interviews?	
References:	Grant-Specific Terms and Conditions (V)(A)	
Notes:		
Recommendations for Improvement:		
13.03.05	Is there a designated supervisor providing regular and consistent support and supervision for each member (based on member file documents and interviews)?	
References:	Grant-Specific Terms and Conditions (V)(A)	
Notes:		
Recommendations for Improvement:		
13.03.06	Does the Commission take reasonable steps to ensure PPR data are valid and accurate?	
	Does the Commission provide tools to subrecipients to ensure accurate reporting?	
	Does the Commission take reasonable steps to ensure subrecipient data are valid?	
	Does the reported figure for the selected PM match the organization's internal records? (Is the data accurate?)	
	Does the selected source documentation sample support the validity of the PM data reported in the PPR?	
References:	FY22 General Terms and Conditions B. Other Applicable Terms and Conditions, 2 CFR 200.301, AmeriCorps Performance Measures Instructions 2023	
Notes:		
Recommendations for Improvement:		
13.03.07	Are members, site supervisors, and prime staff aware of prohibited activities?	
References:	45 CFR 2520.65	
Notes:		
Recommendations for Improvement:		
13.03.08	Do interviews indicate that members, supervisors, and Commission staff do NOT engage in prohibited activities?	

Commission Operations

References:	45 CFR 2520.65	
Notes:		
Recommendations for Improvement:		
13.03.08	Do interviews indicate that members, supervisors, and Commission staff do NOT engage in prohibited activities?	
References:	45 CFR 2520.65	
Notes:		
Recommendations for Improvement:		
13.03.09	Does the Commission provide written policies, guidance, and / or training to subrecipients regarding Prohibited Activities? Cite the document that supports the finding in the notes.	
References:	45 CFR 2520.65	
Notes:		
Recommendations for Improvement:		
13.04: Policies and Procedures		
13.04.01	Does the Commission maintain a set of policies that support internal controls in accordance with 2 CFR 200.303, in order to adequately oversee subrecipients?	
	Policy or procedure for evaluating subrecipients' risk of noncompliance and tailoring monitoring accordingly?	
	Policy or procedure for monitoring subrecipients to ensure compliance with AmeriCorps and grant regulations?	
	Policy or procedure outlining possible enforcement actions for instances of noncompliance?	
	A practice for considering specific conditions (according to their notice of funding, application review process, risk assessment policy / procedure, subrecipient agreement, or other document)?	
	Adequate policies or procedures, and / or training materials to subgrantees regarding tracking member hours? Adequate materials will be easily accessible, and inform subrecipients of the need to track training and fundraising hours.	
References:	2 CFR 200.303	
Notes:		
Recommendations for Improvement:		
Additional Monitoring Comments		

Monitoring Activity - VISTA Programmatic

Program-Specific (VISTA)

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

05.01: VISTA MEMBER MANAGEMENT - VISTA Programmatic

05.01.01	Is there evidence that VISTAs, Summer Associates, or Leaders are serving full-time as defined by the host site?	
References:	DVSA Sec. 104, 42 U.S.C. §4954 (a), 45 CFR 2556.205, VISTA Member Handbook Chapter 1	
Notes:		
Recommendations for Improvement:		
05.01.02	Is there documentation to show that the sponsor is documenting member leave, and is leave in allowable amounts?	
References:	Memorandum of Agreement, DVSA Sec. 105 (b), 42 U.S.C. § 4955 (b), VISTA Member Handbook Chapter 9	
Notes:		
Recommendations for Improvement:		
05.01.03	Does the organization have a policy for VISTA member leave? If so, is the policy compliant with VISTA requirements?	
References:	Memorandum of Agreement, DVSA Sec. 105 (b), 42 U.S.C. § 4955 (b), VISTA Member Handbook Chapter 9	
Notes:		
Recommendations for Improvement:		
05.01.04	Is there a designated supervisor for each VISTA member, Leader, or Summer Associate?	
References:	VISTA Sponsor Handbook - Supporting and Supervising Members; VISTA Member Handbook Chapter 3; Memorandum of Agreement	
Notes:		

VISTA

Recommendations for Improvement:		
05.01.05	Has the VISTA Project Director completed the VISTA Sponsor Orientation and have site supervisors been adequately trained to manage members by the sponsor?	
References:	Memorandum of Agreement	
Notes:		
Recommendations for Improvement:		
05.01.06	Are all activities in the VISTA Assignment Description (VAD) compliant?	
References:	Memorandum of Agreement; VISTA Member Handbook Chapter 1; VISTA Sponsor Handbook - Preparing for New Members	
Notes:		
Recommendations for Improvement:		
05.01.07	Do the performed service activities of the member align with the VISTA Assignment Description (VAD)?	
References:	Memorandum of Agreement; VISTA Member Handbook Chapter 1;	
Notes:		
Recommendations for Improvement:		
05.01.08	Is the designated supervisor providing regular and consistent support for each member?	
References:	Memorandum of Agreement; 45 CFR § 2556.310; VISTA Member Handbook Chapters 2 and 3; VISTA Sponsor Handbook - Supporting and Supervising Members	
Notes:		
Recommendations for Improvement:		
05.01.10	Are members provided work space and any other materials necessary to operate and complete members' assignments?	
References:	Memorandum of Agreement; 45 CFR 2556.115(b); VISTA Sponsor Handbook - Supporting and Supervising Members; VISTA Member Handbook Chapter 14	
Notes:		
Recommendations for Improvement:		

VISTA

05.01.11	If applicable, are members reimbursed for service-related transportation or provided other means of transport?	
References:	45 CFR 2556.115(b); Memorandum of Agreement; VISTA Sponsor Handbook - Supporting and Supervising Members; VISTA Member Handbook Chapter 7	
Notes:		
Recommendations for Improvement:		
05.01.12	If applicable, are optional benefits given to the members appropriate?	
References:	Memorandum of Agreement; 45 CFR 2556.205; 45 CFR 2556.320; 45 CFR 2556.505; VISTA Sponsor Handbook - Supporting and Supervising Members; VISTA Member Handbook Chapters 5 and 11	
Notes:		
Recommendations for Improvement:		
05.01.13	Is there evidence that members:	
	• perform activities that would otherwise be performed by employed workers or volunteers?	
	• supplant the hiring of or result in the displacement of employed workers or other volunteers?	
	• engage in activities that impair existing contracts for service?	
References:	45 CFR 2556.150	
Notes:		
Recommendations for Improvement:		
05.01.14	Does the sponsor offer a site orientation and training at the beginning of each members' service, as well as other training opportunities throughout their service year?	
References:	Memorandum of Agreement; VISTA Sponsor Handbook - Supporting and Supervising Members; VISTA Member Handbook Chapter 4	
Notes:		
Recommendations for Improvement:		
05.01.15	If applicable, do members' outside employment meet requirements and is it documented?	
	• Are outside employment forms approved and on file?	
	• Is members' outside employment part-time?	
	• Is members' outside employment hours not in conflict with VISTA service hours?	
	• Members' outside employers are not the sponsor, sub-site, contractor for the sponsor, or other project-related organization?	
References:	VISTA Member Terms and Conditions; VISTA Sponsor Handbook - Supporting and Supervising Members; VISTA Member Handbook Chapter 14	

VISTA

Notes:	
Recommendations for Improvement:	
05.01.16	If applicable, are teleservice forms complete and approved by the supervisor in eGrants?
References:	VISTA Member Terms and Conditions; VISTA Sponsor Handbook - Supporting and Supervising Members; VISTA Member Handbook Chapter 14
Notes:	
Recommendations for Improvement:	
05.01.17	Does the sponsor recognize AmeriCorps support?
	<ul style="list-style-type: none"> • Are projects visually identified as AmeriCorps (including, but not limited to logos, websites, social media, service gear and clothing) and following AmeriCorps brand guidelines? • Are members provided information that projects are part of AmeriCorps? • Are there alterations to AmeriCorps logos or other brand identities? If yes, did the grantee receive prior written approval from AmeriCorps? • If applicable, do agreements with subsites explicitly state that the program is an AmeriCorps program?
References:	General Terms and Conditions
Notes:	
Recommendations for Improvement:	
05.01.18	Does the progress report raw/source documentation provided demonstrate accuracy and validity of performance measure progress reported?
	If NO, write a brief explanation in the notes section below.
References:	Post Federal Award Requirements: Performance Measurement; FY22 General Terms and Conditions B. Other Applicable Terms and Conditions
Notes:	
Recommendations for Improvement:	
05.02: SUB-SITE OVERSIGHT [Multi-site Projects Only]	
05.02.01	Has the sponsor provided information to current subsites on the conditions of VISTA service?
References:	Memorandum of Agreement
Notes:	
Recommendations for Improvement:	
05.02.02	Has the sponsor entered into a subsite agreement with each subsite?

VISTA

References:	Memorandum of Agreement	
Notes:		
Recommendations for Improvement:		
05.02.03	Does each subsite agreement or Memorandum of Understanding (MOU) contain at least the following elements?	
	<ul style="list-style-type: none"> • Written understanding and agreement that the Site is required to properly ensure that all VISTA resources are used to carry out the VISTA project in conformity with all applicable AmeriCorps laws, regulations, policies, procedures, program guidance and the MA Provisions • Responsibilities of the parties and other program requirements • Policies and procedures regarding requesting removal of members • Records to be kept and reports on project and member progress to be submitted • Written understanding and agreement that while the Sponsor maintains responsibility for the Site's proper use of members, the Site may be held financially responsible to AmeriCorps for the inappropriate use of all such VISTA resources by the Site. • If applicable site support payments. 	
References:	Memorandum of Agreement; 45 CFR § 2556.155	
Notes:		
Recommendations for Improvement:		
05.02.04	Are all subsites eligible to receive VISTA members?	
References:	VISTA Member Handbook Chapter 1, VISTA 556.155 (VISTA 556.155)	
Notes:		
Recommendations for Improvement:		
05.02.05	Does the sponsor require or accept application fees from potential subsites or require subsites to contribute financially to the project beyond Site Support Payment, cost share, or reimbursement (which includes reasonable and actual costs incurred for project administration provided by the sponsor).	
References:	Memorandum of Agreement; 45 CFR 2556.155	
Notes:		
Recommendations for Improvement:		
05.02.06	Does the sponsor monitor subsites to ensure compliance with grant requirements?	
References:	Memorandum of Agreement; General Terms and Conditions; 2 CFR 200.303(c); 2 CFR 200.329(a)	
Notes:		
Recommendations for Improvement:		
05.03: Verification of Terms and Conditions		

VISTA

<p>05.03.01</p>	<p>Is there documentation to show that the recipient maintains a procedure for the filing and adjudication of grievances in alignment with 45 CFR § 1225?</p> <ul style="list-style-type: none"> • Time frames for filing and response • Person who receives and responds to the complaints both informal (grantee personnel) and formal • Documentation required • Legal representation is allowed • Freedom from retaliation/reprisal • The process involved from initial filing, review, decisions made, corrective action, through close out 	
<p>References:</p>	<p>45 CFR 1225</p>	
<p>Notes:</p>		
<p>Recommendations for Improvement:</p>		
<p>05.03.02</p>	<p>Does the organization have a non-discrimination policy that includes all the federally required protected classes as listed below?</p> <p>*NOTE: Updated in the AmeriCorps Program Civil Rights and Non-Harassment Policy 11/7/23. Compliance should be determined based on grant award requirements.</p> <ul style="list-style-type: none"> • Race • Color • National origin • Gender/gender identity or expression/sex • Age • Religion • Sexual orientation • Disability • Political affiliation • Marital or parental status • Reprisal* • Genetic information • Military service • Pregnancy* • Submission of a complaint* 	
<p>References:</p>	<p>AmeriCorps Annual General Terms and Conditions</p>	
<p>Notes:</p>		
<p>Recommendations for Improvement:</p>		
<p>05.03.03</p>	<p>Based on information available to AmeriCorps, in the last two years, did the grantee document grievances and/or discrimination/harassment complaints and the corresponding follow up/response in compliance with applicable federal statutes as embodied in the program regulations?</p> <p>Has the sponsor or any of the service sites/volunteer stations had grievances and/or discrimination/harassment complaints filed against them regarding services provided under this grant or had civil rights compliance reviews regarding services conducted?</p> <p>Has the grantee or any service site had grievances and/or /discrimination/harassment complaints filed against them?</p>	

VISTA

	<ul style="list-style-type: none"> • Was the grievance and/or discrimination/harassment complaint or non-compliance substantiated? 	
	<ul style="list-style-type: none"> • Was relief or remedial action taken? (Please describe) 	
References:	45 CFR 1225, AmeriCorps Annual General Terms and Conditions, 45 CFR 2556	
Notes:		
Recommendations for Improvement:		
05.03.04	Does the grantee/sponsor have a policy and procedure in place regarding the provision of reasonable accommodation to ensure accessibility as per the federal requirements?	
References:	45 CFR 1203/1214/1232, Rehabilitation Act of 1973: Sections 504, 508	
Notes:		
Recommendations for Improvement:		
05.03.05	Does the sponsor/grantee have a system (a plan or process) in place for ensuring accessibility to persons with Limited English Proficiency?	
References:	AmeriCorps Annual General Terms and Conditions, Executive Order 13166, 67 FR 64604, Title VI, Civil Rights Act 1964: Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons	
Notes:		
Recommendations for Improvement:		
05.03.06	Does the grantee notify members, community beneficiaries, applicants, program staff, and the public, including those with impaired vision or hearing, that it operates in accordance with federal and program requirements on non-discrimination and non-harassment?	
	a. Does the policy summarize the requirements, note the availability of compliance history information, and explain the procedures for filing discrimination complaints with AmeriCorps?	
	b. Does the policy include information on civil rights and non-harassment requirements, complaint procedures and the rights of beneficiaries in member/volunteer service agreements, handbooks, manuals, pamphlets, and posted in prominent locations, as appropriate?	
	c. Does the sponsor/grantee notify the public in recruitment material and application forms that it operates its program or activity subject to nondiscrimination requirements?	
References:	AmeriCorps Annual General Terms and Conditions, 45 CFR 2556	
Notes:		
Recommendations for Improvement:		
Additional Monitoring Comments		

Monitoring Activity - SCP Programmatic

Program-Specific (SCP)

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

06: SCP VOLUNTEER MANAGEMENT - SCP Programmatic

06.01.01	Do all volunteers meet the minimum age requirement at the time of enrollment?	
References:	SCP Regulation: 45 CFR § 2551.41 (a)(1)	
Notes:		
Recommendations for Improvement:		
06.01.02	Are stipend volunteers all income eligible?	
References:	45 § 2551.41(a)(2), 45 CFR 2551.43, 45 CFR § 2551.44	
Notes:		
Recommendations for Improvement:		
06.01.04	Review the volunteer assignment plans and complete the required interviews. Do the volunteer's service activities align with their plan?	
References:	45 CFR §2551.71, 45 CFR § 2551.72, 45 CFR § 2551.73	
Notes:		
Recommendations for Improvement:		
06.01.05	Is there a designated supervisor providing regular and consistent support for each volunteer?	
References:	SCP Regulation: 45 CFR §2551.62(f); §2551.71(a)(4)	
Notes:		
Recommendations for Improvement:		
06.01.06	Are supervisors adequately trained by the grantee to manage volunteers?	
References:	SCP Regulation: 45 CFR §2551.62(f); §2551.71(a)(4),	
Notes:		

SCP

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

SCP

References:	General Terms and Conditions	
Notes:		
Recommendations for Improvement:		
06.01.11	Does the progress report raw/source documentation provided demonstrate accuracy and validity of performance measure progress reported? If NO, write a brief explanation in the notes section below.	
References:	Post Federal Award Requirements: Performance Measurement; FY22 General Terms and Conditions B. Other Applicable Terms and Conditions	
Notes:		
Recommendations for Improvement:		
06.02: SCP STATION OVERSIGHT		
06.02.01	Is there a current MOU for all volunteer stations, where volunteers are currently serving, signed within the past 3 years?	
References:	SCP Regulation: 45 CFR §2551.23(c)(2)	
Notes:		
Recommendations for Improvement:		
06.02.02	Do MOUs meet the basic requirements as stated in the regulations, i.e.:	
	a. Negotiated prior to volunteer placement;	
	b. Specifies the mutual responsibilities of the station and sponsor;	
	c. Renegotiated every 3 years;	
	d. Contains the required non-discrimination commitment;	
	e. Contains the required reasonable accommodation language?	
References:	SCP Regulation: 45 CFR §2551.23(c)(2)	
Notes:		
Recommendations for Improvement:		
06.02.03	Does the project document that the volunteer stations are public or private non-profit agencies or organizations, with the exception of proprietary health care facilities? What is the grantees method for ensuring that volunteer station sites are appropriate per the regulations?	
References:	SCP Regulation: 45 CFR §2551.23(c)(1)	
Notes:		

SCP

Recommendations for Improvement:		
06.02.04	Does the grantee monitor service site(s) to ensure compliance with grant requirements?	
References:	Memorandum of Agreement; General Terms and Conditions; 2 CFR 200.303(c); 2 CFR 200.329(a)	
Notes:		
Recommendations for Improvement:		
06.03: Verification of Terms and Conditions		
06.03.01	<p>Is there documentation to show that the recipient maintains a procedure for the filing and adjudication of grievances in alignment with 45 CFR § 1225?</p> <p>Documentation should outline the following at minimum:</p> <ul style="list-style-type: none"> • Time frames for filing and response • Person who receives and responds to the complaints both informal (grantee personnel) and formal • Documentation required • Legal representation is allowed • Freedom from retaliation/reprisal • The process involved from initial filing, review, decisions made, corrective action, through close out 	
References:	45 CFR 1225	
Notes:		
Recommendations for Improvement:		
06.03.02	<p>Does the organization have a non-discrimination policy that includes all the federally required protected classes as listed below?</p> <p>*NOTE: Updated in the AmeriCorps Program Civil Rights and Non-Harassment Policy 11/7/23. Compliance should be determined based on grant award requirements.</p> <ul style="list-style-type: none"> • Race • Color • National origin • Gender/gender identity or expression/sex • Age • Religion • Sexual orientation • Disability • Political affiliation • Marital or parental status • Reprisal* • Genetic information • Military service 	

SCP

	<ul style="list-style-type: none"> • Pregnancy* 	
	<ul style="list-style-type: none"> • Submission of a complaint* 	
References:	AmeriCorps Annual General Terms and Conditions	
Notes:		
Recommendations for Improvement:		
06.03.03	<p>Based on information available to AmeriCorps, in the last two years, did the grantee document grievances and/or discrimination/harassment complaints and the corresponding follow up/response in compliance with applicable federal statutes as embodied in the program regulations?</p> <p>Has the sponsor or any of the service sites/volunteer stations had grievances and/or discrimination/harassment complaints filed against them regarding services provided under this grant or had civil rights compliance reviews regarding services conducted?</p> <p>Has the grantee or any service site had grievances and/or /discrimination/harassment complaints filed against them?</p>	
	<ul style="list-style-type: none"> • Was the grievance and/or discrimination/harassment complaint or non-compliance substantiated? 	
	<ul style="list-style-type: none"> • Was relief or remedial action taken? (Please describe) 	
References:	45 CFR 1225, AmeriCorps Annual General Terms and Conditions, 45 CFR 2551	
Notes:		
Recommendations for Improvement:		
06.03.04	Does the grantee/sponsor have a policy and procedure in place regarding the provision of reasonable accommodation to ensure accessibility as per the federal requirements?	
References:	45 CFR 1203/1214/1232, Rehabilitation Act of 1973: Sections 504, 508	
Notes:		
Recommendations for Improvement:		
06.03.05	Does the sponsor/grantee have a system (a plan or process) in place for ensuring accessibility to persons with Limited English Proficiency?	
References:	AmeriCorps Annual General Terms and Conditions, Executive Order 13166, 67 FR 64604, Title VI, Civil Rights Act 1964: Prohibition Against National Origin Discrimination Affecting Limited English Proficient	
Notes:		
Recommendations for Improvement:		

SCP

06.03.06	Does the grantee notify members, community beneficiaries, applicants, program staff, and the public, including those with impaired vision or hearing, that it operates in accordance with federal and program requirements on non-discrimination and non-harassment?	
	a. Does the policy summarize the requirements, note the availability of compliance history information, and explain the procedures for filing discrimination complaints with AmeriCorps?	
	b. Does the policy include information on civil rights and non-harassment requirements, complaint procedures and the rights of beneficiaries in member/volunteer service agreements, handbooks, manuals,	
	c. Does the sponsor/grantee notify the public in recruitment material and application forms that it operates its program or activity subject to nondiscrimination requirements?	
References:	AmeriCorps Annual General Terms and Conditions, 45 CFR 2551	
Notes:		
Recommendations for Improvement:		
Additional Monitoring Comments		

Monitoring Activity - FGP Programmatic



Program-Specific (FGP)

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

07.01: FGP VOLUNTEER MANAGEMENT - FGP Programmatic

07.01.01	Eligibility: Do volunteers meet the minimum age requirement at the time of enrollment?	
References:	FGP Regulation: 45 CFR § 2552.41 (a)(1)	
Notes:		
Recommendations for Improvement:		
07.01.02	Are stipended volunteers all income eligible?	
References:	FGP Regulation: 45 CFR § 2552.41 (2); 45 CFR § 2552.44	
Notes:		
Recommendations for Improvement:		
07.01.04	Review the volunteer service agreements and complete the required interviews. Do the service activities of the volunteer align with the agreement?	
References:	45 CFR §2552.72 and 45 CFR §2552.71	
Notes:		
Recommendations for Improvement:		
07.01.05	Is there a designated supervisor providing regular and consistent support for each volunteer?	
References:	FGP Regulation: 45 CFR §2552.62(f); 45 CFR §2552.71(e)	
Notes:		
Recommendations for Improvement:		
07.01.06	Are supervisors adequately trained by the grantee to manage volunteers?	
References:	FGP Regulation: 45 CFR §2552.62(f); 45 CFR §2552.71(e)	
Notes:		

FGP

Recommendations for Improvement:		
07.01.07	Review volunteer assignment plans and respond to these questions:	
	(a) Are all Foster Grandparents provided written volunteer assignment plans?	
	(b) Do records show that the plans are approved by the sponsor and accepted by the Foster Grandparent?	
	(c) Do the plans identify the individual child(ren) to be served?	
	(d) Do the plans address the period the child(ren) will receive the volunteer's services?	
	(e) Do the plans identify the roles and activities of the volunteer and the expected outcomes for the child(ren)?	
	(f) Are all activities included in the volunteer assignment plan compliant?	
References:	FGP Regulation: 45 CFR § 2552.72	
Notes:		
Recommendations for Improvement:		
07.01.08	Approved activities: Complete the required volunteer interviews. For FGP, do all Foster Grandparents provide direct services to one or more eligible children that result in person-to-person supportive relationships with each child served and that support the development and growth of each child served?	
References:	FGP: Regulation: 45 CFR § 2552.71 (a)-(c)	
Notes:		
Recommendations for Improvement:		
07.01.09	Approved activities: Complete the required volunteer interviews. For FGP, does the project ensure that Foster Grandparents are not assigned to roles such as teacher's aides, group leaders or other similar positions that would detract from the person-to-person relationship?	
References:	FGP Regulation: 45 CFR §2552.71(a)-(c)	
Notes:		
Recommendations for Improvement:		
07.01.10	Does the grantee recognize AmeriCorps support?	
	• Are projects visually identified as AmeriCorps (including, but not limited to logos, websites, social media, service gear and clothing) and following AmeriCorps brand guidelines?	
	• Are volunteers provided information that projects are part of AmeriCorps?	
	• Are there alterations to AmeriCorps logos or other brand identities? If yes, did the grantee receive prior written approval from AmeriCorps?	
	• If applicable, do agreements with subsites explicitly state that the program is an AmeriCorps program?	
References:	General Terms and Conditions	

FGP

Notes:		
Recommendations for Improvement:		
07.01.11	Does the progress report raw/source documentation provided demonstrate accuracy and validity of performance measure progress reported?	
References:	2 CFR 200.301; General Terms and Conditions	
Notes:		
Recommendations for Improvement:		
07.02: FGP STATION OVERSIGHT		
07.02.01	Is there a current MOU for all volunteer stations, where volunteers are currently serving, signed within the past 3 years?	
References:	FGP Regulation: 45 CFR §2552.23(c)(2)	
Notes:		
Recommendations for Improvement:		
07.02.02	Do MOUs meet the basic requirements as stated in the regulations, i.e.:	
	a. Negotiated prior to volunteer placement;	
	b. Specifies the mutual responsibilities of the station and sponsor;	
	c. Renegotiated every 3 years;	
	d. Contains the required non-discrimination commitment;	
	e. Contains the required reasonable accommodation language?	
References:	FGP Regulation: 45 CFR §2552.23(c)(2)	
Notes:		
Recommendations for Improvement:		
07.02.03	1) Does the project document that the volunteer stations are public or private non-profit agencies or organizations, with the exception of proprietary health care facilities? 2) What is your method for ensuring that volunteer stations are appropriate per the regulations?	
References:	FGP Regulation: 45 CFR § 2552.23(c)(1)	
Notes:		
Recommendations for Improvement:		
07.02.04	Does the grantee monitor service site(s) to ensure compliance with grant requirements?	

References:	Memorandum of Agreement; General Terms and Conditions; 2 CFR 200.303(c); 2 CFR 200.329(a)	
Notes:		
Recommendations for Improvement:		
07.03: Verification of Terms and Conditions		
07.03.01	<p>Is there documentation to show that the recipient maintains a procedure for the filing and adjudication of grievances in alignment with 45 CFR § 1225?</p> <p>Documentation should outline the following at minimum:</p> <ul style="list-style-type: none"> • Time frames for filing and response • Person who receives and responds to the complaints both informal (grantee personnel) and formal • Documentation required • Legal representation is allowed • Freedom from retaliation/reprisal • The process involved from initial filing, review, decisions made, corrective action, through close out 	
References:	45 CFR 1225 [These additional references are related to this question however are no longer maintained within the question/compliance determination. They are here to provide additional background information and context and for archival purposes. AmeriCorps Annual General Terms and Conditions, NCSA § 175, 176f or § 417 of the DVSA, 2 CFR § 3187.12, 45 CFR 2540.210, 45 CFR 4552]	
Notes:		
Recommendations for Improvement:		
07.03.02	<p>Does the organization have a non-discrimination policy that includes all the federally required protected classes as listed below?</p> <p>*NOTE: Updated in the AmeriCorps Program Civil Rights and Non-Harassment Policy 11/7/23. Compliance should be determined based on grant award requirements.</p> <ul style="list-style-type: none"> • Race • Color • National origin • Gender/gender identity or expression/sex • Age • Religion • Sexual orientation • Disability • Political affiliation • Marital or parental status • Reprisal* • Genetic information • Military service • Pregnancy* • Submission of a complaint* 	
References:	General Terms and Conditions These additional references are related to this question however are no longer maintained within the question/compliance determination. They are here to provide additional background information and context and for archival purposes. NCSA § 175, 176f or § 417 of the DVSA, 2 CFR § 3187.12, 45 CFR 2540.210, 45 CFR 4552	

Notes:		
Recommendations for Improvement:		
07.03.03	<p>Based on information available to AmeriCorps, in the last two years, did the grantee document grievances and/or discrimination/harassment complaints and the corresponding follow up/response in compliance with applicable federal statutes as embodied in the program regulations?</p> <p>Has the sponsor or any of the service sites/volunteer stations had grievances and/or discrimination/harassment complaints filed against them regarding services provided under this grant or had civil rights compliance reviews regarding services conducted?</p> <p>Has the grantee or any service site had grievances and/or /discrimination/harassment complaints filed against them?</p>	
	<ul style="list-style-type: none"> • Was the grievance and/or discrimination/harassment complaint or non-compliance substantiated? 	
	<ul style="list-style-type: none"> • Was relief or remedial action taken? (Please describe) 	
References:	<p>45 CFR 1225, General Terms and Conditions, 45 CFR 4552 These additional references are related to this question however are no longer maintained within the question/compliance determination. They are here to provide additional background information and context and for archival purposes. NCSA § 175, 176f or § 417 of the DVSA, 2 CFR § 3187.12, 45 CFR 2540.210</p>	
Notes:		
Recommendations for Improvement:		
07.03.04	<p>Does the grantee/sponsor have a policy and procedure in place regarding the provision of reasonable accommodation for staff and volunteers to ensure accessibility as per the federal requirements?</p>	
References:	<p>45 CFR 1203/1214/1232, Rehabilitation Act of 1973: Sections 504, 508</p>	
Notes:		
Recommendations for Improvement:		
07.03.05	<p>Does the sponsor/grantee have a system (a plan or process) in place for ensuring accessibility to persons with Limited English Proficiency?</p>	
References:	<p>AmeriCorps Annual General Terms and Conditions, Executive Order 13166, 67 FR 64604, Title VI, Civil Rights Act 1964: Prohibition Against National Origin Discrimination Affecting Limited English Proficient</p>	
Notes:		
Recommendations for Improvement:		

FGP

07.03.06	Does the grantee notify members, community beneficiaries, applicants, program staff, and the public, including those with impaired vision or hearing, that it operates in accordance with federal and program requirements on non-discrimination and non-harassment?	
	a. Does the policy summarize the requirements, note the availability of compliance history information, and explain the procedures for filing discrimination complaints with AmeriCorps?	
	b. Does the policy include information on civil rights and non-harassment requirements, complaint procedures and the rights of beneficiaries in member/volunteer service agreements, handbooks, manuals, pamphlets, and posted in prominent locations, as appropriate?	
	c. Does the sponsor/grantee notify the public in recruitment material and application forms that it operates its program or activity subject to nondiscrimination requirements?	
References:	AmeriCorps Annual General Terms and Conditions, 45 CFR 2552	
Notes:		
Recommendations for Improvement:		
Additional Monitoring Comments		

Monitoring Activity - RSVP Programmatic

Program-Specific (RSVP)

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

08.01: RSVP VOLUNTEER MANAGEMENT - RSVP Programmatic

08.01.01	Do volunteers meet the minimum age requirement at the time of enrollment?	
References:	RSVP Regulation: 45 CFR § 2553.41 (a)(1)	
Notes:		
Recommendations for Improvement:		
08.01.02	Are all activities included in the description/assignment compliant?	
References:	RSVP Regulation: 45 CFR §2553.12	
Notes:		
Recommendations for Improvement:		
08.01.03	Review the volunteer service agreements and complete the required interviews. Do the service activities of the volunteer align with the agreement?	
References:	RSVP Regulation: 45 CFR §2553.12	
Notes:		
Recommendations for Improvement:		
08.01.04	Is there a designated supervisor providing regular and consistent support for each volunteer?	
References:	RSVP Regulation: 45 CFR §2553.62(b); §2553.62(f)(3)	
Notes:		
Recommendations for Improvement:		
08.01.05	Are supervisors adequately trained by the grantee to manage volunteers?	
References:	RSVP Regulation: 45 CFR §2553.62(b); §2553.62(f)(3)	

RSVP

Notes:													
Recommendations for Improvement:													
08.01.07	<table border="1"> <tr> <td>Does the grantee recognize AmeriCorps support?</td> <td></td> </tr> <tr> <td>• Are projects visually identified as AmeriCorps (including, but not limited to logos, websites, social media, service gear and clothing) and following AmeriCorps brand guidelines?</td> <td></td> </tr> <tr> <td>• Are volunteers provided information that projects are part of AmeriCorps?</td> <td></td> </tr> <tr> <td>• Are there alterations to AmeriCorps logos or other brand identities? If yes, did the grantee receive prior written approval from AmeriCorps?</td> <td></td> </tr> <tr> <td>• If applicable, do agreements with subsites explicitly state that the program is an AmeriCorps program?</td> <td></td> </tr> </table>	Does the grantee recognize AmeriCorps support?		• Are projects visually identified as AmeriCorps (including, but not limited to logos, websites, social media, service gear and clothing) and following AmeriCorps brand guidelines?		• Are volunteers provided information that projects are part of AmeriCorps?		• Are there alterations to AmeriCorps logos or other brand identities? If yes, did the grantee receive prior written approval from AmeriCorps?		• If applicable, do agreements with subsites explicitly state that the program is an AmeriCorps program?			
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• If applicable, do agreements with subsites explicitly state that the program is an AmeriCorps program?													
References:	General Terms and Conditions												
Notes:													
Recommendations for Improvement:													
08.01.08	Does the progress report raw/source documentation provided demonstrate accuracy and validity of performance measure progress reported?												
References:	Post Federal Award Requirements: Performance Measurement; FY22 General Terms and Conditions B. Other Applicable Terms and Conditions												
Notes:													
Recommendations for Improvement:													
08.02: RSVP STATION OVERSIGHT													
08.02.01	Is there a current MOU for all volunteer stations, where volunteers are currently serving, signed within the past 3 years?												
References:	RSVP Regulation: 45 CFR §2553.23(c)(2)												
Notes:													
Recommendations for Improvement:													
08.02.02	<table border="1"> <tr> <td>Do MOUs meet the basic requirements as stated in the regulations, i.e.:</td> <td></td> </tr> <tr> <td>a. Negotiated prior to volunteer placement;</td> <td></td> </tr> <tr> <td>b. Specifies the mutual responsibilities of the station and sponsor;</td> <td></td> </tr> <tr> <td>c. Renegotiated every 3 years;</td> <td></td> </tr> <tr> <td>d. Contains the required non-discrimination commitment;</td> <td></td> </tr> <tr> <td>e. Contains the required reasonable accommodation language?</td> <td></td> </tr> </table>	Do MOUs meet the basic requirements as stated in the regulations, i.e.:		a. Negotiated prior to volunteer placement;		b. Specifies the mutual responsibilities of the station and sponsor;		c. Renegotiated every 3 years;		d. Contains the required non-discrimination commitment;		e. Contains the required reasonable accommodation language?	
Do MOUs meet the basic requirements as stated in the regulations, i.e.:													
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b. Specifies the mutual responsibilities of the station and sponsor;													
c. Renegotiated every 3 years;													
d. Contains the required non-discrimination commitment;													
e. Contains the required reasonable accommodation language?													
References:	RSVP Regulation: 45 CFR §2553.23(c)(2)												

RSVP

Notes:		
Recommendations for Improvement:		
08.02.03	1) Does the project document that the volunteer stations are public or private non-profit agencies or organizations, with the exception of proprietary health care facilities? 2) What is your method for ensuring that volunteer stations are appropriate per the regs?	
References:	RSVP Regulation: 45 CFR §2553.23(c)(1)	
Notes:		
Recommendations for Improvement:		
08.02.04	Does the grantee monitor service site(s) to ensure compliance with grant requirements?	
References:	Memorandum of Agreement; General Terms and Conditions; 2 CFR 200.303(c); 2 CFR 200.329(a)	
Notes:		
Recommendations for Improvement:		
08.03: Verification of Terms and Conditions		
08.03.01	Is there documentation to show that the recipient maintains a procedure for the filing and adjudication of grievances in alignment with 45 CFR § 1225? Documentation should outline the following at minimum: <ul style="list-style-type: none"> • Time frames for filing and response • Person who receives and responds to the complaints both informal (grantee personnel) and formal (EEO Director of AmeriCorps or AmeriCorps designee) • Documentation required • Legal representation is allowed • Freedom from retaliation/reprisal • The process involved from initial filing, review, decisions made, corrective action, through close out 	
References:	45 CFR 1225	
Notes:		
Recommendations for Improvement:		
08.03.02	Does the organization have a non-discrimination policy that includes all the federally required protected classes as listed below? *NOTE: Updated in the AmeriCorps Program Civil Rights and Non-Harassment Policy 11/7/23. Compliance should be determined based on grant award requirements. <ul style="list-style-type: none"> • Race • Color 	

RSVP

	<ul style="list-style-type: none"> • National origin • Gender/gender identity or expression/sex • Age • Religion • Sexual orientation • Disability • Political affiliation • Marital or parental status • Reprisal* • Genetic information • Military service • Pregnancy* • Submission of a complaint* 	
References:	AmeriCorps Annual General Terms and Conditions	
Notes:		
Recommendations for Improvement:		
08.03.03	<p>Based on information available to AmeriCorps, in the last two years, did the grantee document grievances and/or discrimination/harassment complaints and the corresponding follow up/response in compliance with applicable federal statutes as embodied in the program regulations?</p> <p>Has the sponsor or any of the service sites/volunteer stations had grievances and/or discrimination/harassment complaints filed against them regarding services provided under this grant or had civil rights compliance reviews regarding services conducted?</p> <p>Has the grantee or any service site had grievances and/or /discrimination/harassment complaints filed against them?</p>	
	<ul style="list-style-type: none"> • Was the grievance and/or discrimination/harassment complaint or non-compliance substantiated? • Was relief or remedial action taken? (Please describe) 	
References:	45 CFR 1225, AmeriCorps Annual General Terms and Conditions, 45 CFR 2553	
Notes:		
Recommendations for Improvement:		
08.03.04	Does the grantee/sponsor have a policy and procedure in place regarding the provision of reasonable accommodation to ensure accessibility as per the federal requirements?	
References:	45 CFR 1203/1214/1232, Rehabilitation Act of 1973: Sections 504, 508	
Notes:		
Recommendations for Improvement:		
08.03.05	Does the sponsor/grantee have a system (a plan or process) in place for ensuring accessibility to persons with Limited English Proficiency?	

RSVP

References:	AmeriCorps Annual General Terms and Conditions, Executive Order 13166, 67 FR 64604, Title VI, Civil Rights Act 1964: Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons	
Notes:		
Recommendations for Improvement:		
08.03.06	Does the grantee notify members, community beneficiaries, applicants, program staff, and the public, including those with impaired vision or hearing, that it operates in accordance with federal and program requirements on non-discrimination and non-harassment?	
	a. Does the policy summarize the requirements, note the availability of compliance history information, and explain the procedures for filing discrimination complaints with AmeriCorps?	
	b. Does the policy include information on civil rights and non-harassment requirements, complaint procedures and the rights of beneficiaries in member/volunteer service agreements, handbooks, manuals, pamphlets, and posted in prominent locations, as appropriate?	
	c. Does the sponsor/grantee notify the public in recruitment material and application forms that it operates its program or activity subject to nondiscrimination requirements?	
References:	AmeriCorps Annual General Terms and Conditions, 45 CFR 2553	
Notes:		
Recommendations for Improvement:		
Additional Monitoring Comments		

Monitoring Activity - Days of Service Programmatic

Program-Specific (Days of Service)

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

12.01: Activities - Days of Service Programmatic

12.01.01	Are service activities consistent with the approved project application?	
References:	General Terms and Conditions	
Notes:		
Recommendations for Improvement:		
12.01.02	Are service activities consistent with the grant purpose as described in 42 U.S. Code § 12653 (i) Martin Luther King, Jr., Service Day or 42 U.S. Code § 12653 (k) September 11th Day of Service as applicable? (For MLK Day service activities shall consist of activities reflecting the life and teachings of MLK, Jr., and for 9/11 service activities include charitable and remembrance opportunities.)	
References:	42 US Code § 12653 Additional Corporation activities to support national service DoS NOFO Section A.1. General Terms and Conditions	
Notes:		
Recommendations for Improvement:		
12.01.03	Were service activities carried out at a minimum of ten service sites?	
References:	Day of Service Notice of Funding Opportunity; General Terms and Conditions	
Notes:		
Recommendations for Improvement:		
12.01.04	Did service activities occur either on September 11th or MLK Day as applicable or in close proximity to that date?	
References:	42 U.S.C. § 12653; Day of Service Notice of Funding Opportunity; General Terms and Conditions	
Notes:		
Recommendations for Improvement:		
12.01.05	Does the grantee recognize AmeriCorps support?	

Days of Service

	<ul style="list-style-type: none"> • Are projects visually identified as AmeriCorps (including, but not limited to logos, websites, social media, service gear and clothing) and following AmeriCorps brand guidelines? • Are volunteers provided information that projects are part of AmeriCorps? • Are there alterations to AmeriCorps logos or other brand identities? If yes, did the grantee receive prior written approval from AmeriCorps? • If applicable, do agreements with subrecipients or service locations explicitly state that the program is an AmeriCorps program? 	
References:	General Terms and Conditions, AmeriCorps Branding Page	
Notes:		
Recommendations for Improvement:		
12.01.06	Does the raw/source data provided demonstrate accuracy and validity of performance measure progress reported?	
References:	Day of Service Notice of Funding Opportunity; General Terms and Conditions	
Notes:		
Recommendations for Improvement:		
12.02: DoS Subaward Competition		
12.02.01	If applicable, are subawards made competitively?	
References:	Day of Service Notice of Funding Opportunity; General Terms and Conditions	
Notes:		
Recommendations for Improvement:		
12.02.02	If applicable, is each subaward greater or equal to \$1,000 annually per subaward?	
References:	Day of Service Notice of Funding Opportunity; General Terms and Conditions	
Notes:		
Recommendations for Improvement:		
12.03: Verification of Terms and Conditions		
12.03.01	Is there documentation to show that the recipient maintains a procedure for the filing and adjudication of grievances in alignment with 45 CFR § 1225?	
	Documentation should outline the following at minimum:	
	<ul style="list-style-type: none"> • Time frames for filing and response • Person who receives and responds to the complaints both informal (grantee personnel) and formal (EEO Director of AmeriCorps or AmeriCorps designee) • Documentation required 	

Days of Service

	<ul style="list-style-type: none"> • Legal representation is allowed • Freedom from retaliation/reprisal • The process involved from initial filing, review, decisions made, corrective action, through close out 	
References:	45 CFR 1225	
Notes:		
Recommendations for Improvement:		
12.03.02	<p>Does the organization have a non-discrimination policy that includes all the federally required protected classes as listed below?</p> <p>*NOTE: Updated in the AmeriCorps Program Civil Rights and Non-Harassment Policy 11/7/23. Compliance should be determined based on grant award requirements.</p> <ul style="list-style-type: none"> • Race • Color • National origin • Gender/gender identity or expression/sex • Age • Religion • Sexual orientation • Disability • Political affiliation • Marital or parental status • Reprisal* • Genetic information • Military service • Pregnancy* • Submission of a complaint* 	
References:	AmeriCorps Annual General Terms and Conditions	
Notes:		
Recommendations for Improvement:		
12.03.03	<p>Based on information available to AmeriCorps, in the last two years, did the grantee document grievances and/or discrimination/harassment complaints and the corresponding follow up/response in compliance with applicable federal statutes as embodied in the program regulations?</p> <p>Has the sponsor or any of the service sites/volunteer stations had grievances and/or discrimination/harassment complaints filed against them regarding services provided under this grant or had civil rights compliance reviews regarding services conducted? Yes/No</p> <p>Has the grantee or any service site had grievances and/or /discrimination/harassment complaints filed against them? Yes/No</p> <p>If the answer to any of the above questions is YES, review the following:</p> <ul style="list-style-type: none"> • Was the grievance and/or discrimination/harassment complaint or non-compliance substantiated? • Was relief or remedial action taken? (Please describe) 	
References:	45 CFR 1225, AmeriCorps Annual General Terms and Conditions	

Days of Service

Notes:		
Recommendations for Improvement:		
12.03.04	Does the grantee/sponsor have a policy and procedure in place regarding the provision of reasonable accommodation for staff and volunteers to ensure accessibility as per the federal requirements?	
References:	45 CFR 1203/1214/1232, Rehabilitation Act of 1973: Sections 504, 508	
Notes:		
Recommendations for Improvement:		
12.03.05	Does the sponsor/grantee have a system (a plan or process) in place for ensuring accessibility to persons with Limited English Proficiency?	
References:	AmeriCorps Annual General Terms and Conditions, Executive Order 13166, 67 FR 64604, Title VI, Civil Rights Act 1964: Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons	
Notes:		
Recommendations for Improvement:		
12.03.06	Does the grantee notify members, community beneficiaries, applicants, program staff, and the public, including those with impaired vision or hearing, that it operates in accordance with federal and program requirements on non-discrimination?	
	a. Does the policy summarize the requirements, note the availability of compliance history information, and explain the procedures for filing discrimination complaints with AmeriCorps?	
	b. Does the policy include information on civil rights requirements, complaint procedures and the rights of beneficiaries in member/volunteer service agreements, handbooks, manuals, pamphlets, and posted in prominent locations, as appropriate?	
	c. Does the sponsor/grantee notify the public in recruitment material and application forms that it operates its program or activity subject to nondiscrimination requirements?	
References:	AmeriCorps Annual General Terms and Conditions, relevant program regulations: 45 CFR Parts 2540 (ASN), 45 CFR 2551 (SCP), 45 CFR 2552 (FGP), 45 CFR 2553 (RSVP), and 45 CFR 2556 (VISTA).	
Notes:		
Recommendations for Improvement:		
12.04: Prohibited Activities		
12.04.01	Does the grantee have a policy on Prohibited Activities?	
	a. Are members/volunteers, site supervisors, and prime staff aware of prohibited activities applicable to their respective programs? (Able to name at least two)	
	b. Does the grantee provide appropriate oversight of the staff/volunteers with regard to Prohibited Activities? (Please Describe)	

Days of Service

References:	
Notes:	
Recommendations for Improvement:	
Additional Monitoring Comments	

Monitoring Activity - National Service Criminal History Check (NSCHC)

NATIONAL SERVICE CRIMINAL HISTORY CHECK (NSCHC)

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

09.01: NSCHC Policy

09.01.01	Does the organization have a policy or procedure describing the internal process for conducting NSCHC?	
References:		
Notes:		
Recommendations for Improvement:		
09.01.02	Does the NSCHC policy or procedure cover all recommended topics, as applicable?	
Sub Reference:	Covered Positions (45 CFR §2540.201)	
	<ul style="list-style-type: none"> The policy correctly explains who is subject to the NSCHC process (as applicable to the grant/program). 	
Sub Reference:	Eligibility (45 CFR §2540.202)	
	<ul style="list-style-type: none"> The policy correctly outlines the eligibility criteria / describes ineligible individuals as listed in 45 CFR § 2540.202. 	
Sub Reference:	Nondiscriminatory Screening Criteria (45 CFR §2540.203)	
	<ul style="list-style-type: none"> Grantees may establish screening criteria beyond the NSCHC eligibility requirements specified in 45 CFR § 2540.202. If establishing screening criteria beyond the NSCHC eligibility requirements, the policy requires that the program ensure suitability criteria are consistent with state and Federal Civil Rights and nondiscrimination laws. 	
Sub Reference:	Check Components (45 CFR §2540.204)	

	<ul style="list-style-type: none"> The policy correctly specifies what NSCHC components are required: (1) a nationwide check of the NSOPW.gov, (2) a check of the individual's state of residence and state of service, and (3) a fingerprint-based check of the FBI. 	
	<ul style="list-style-type: none"> The policy identifies which AmeriCorps-approved sources will be used for all levels of NSCHC as listed in 45 CFR § 2540.204. 	
	<ul style="list-style-type: none"> The policy explains the process used to determine the current first and last name used on a name-based check. 	
	<ul style="list-style-type: none"> The policy describes how the program determines the applicant's state of residence. 	
	<ul style="list-style-type: none"> If not using Truescreen, the policy includes a requirement to conduct a subsequent NSOPW.gov check if states/territories are not reporting when the initial check is run, OR a requirement to run statewide sex offender checks in the states/territories not reporting. 	
Sub Reference:	Timing (45 CFR §2540.205)	
	<ul style="list-style-type: none"> The policy explains the timing requirement: that all checks are conducted, reviewed, and an eligibility determination made by the recipient no later than the day before the start date of work or service. 	
	<ul style="list-style-type: none"> The policy requires the full NSCHC to be conducted again if an individual's relationship with the organization is terminated (break in work or service) for a period of more than 180 days. 	
Sub Reference:	Review and Eligibility Determination / Adjudication (45 CFR §2540.205)	
	<ul style="list-style-type: none"> The policy describes the process for staff to review results and make an eligibility determination, including documenting when this takes place. 	
	<ul style="list-style-type: none"> The policy ensures that staff requiring NSCHC are not responsible for reviewing and adjudicating their own check results. 	
	<ul style="list-style-type: none"> If using the AmeriCorps-approved vendors, the policy describes the process to determine eligibility if a vendor's adjudication recommendation is 'not to recommend'. 	
	<ul style="list-style-type: none"> If not using Truescreen, the policy describes the process for resolving any hits that have the same name as the applicant on the NSOPW.gov check. 	
Sub Reference:	Procedures and Documentation (45 CFR §2540.206)	
	<ul style="list-style-type: none"> The policy requires the program to obtain a person's consent before conducting the state and FBI components of the National Service Criminal History Check. 	
	<ul style="list-style-type: none"> The policy describes how notice is provided to the individual that selection into the program is contingent upon the organization's review of the individual's NSCHC results. 	
	<ul style="list-style-type: none"> The policy requires that a program provide a reasonable opportunity for the individual to review and challenge the factual accuracy of a result before action is taken to exclude the individual from the position. 	

	<ul style="list-style-type: none"> The policy requires the program to provide safeguards to ensure the confidentiality of any information relating to the criminal history check, consistent with authorization provided by the applicant. 	
	<ul style="list-style-type: none"> The policy requires the program to maintain documentation of the NSCHC as grant records. 	
	<ul style="list-style-type: none"> The policy ensures that the individual is not charged for the cost of any component of a NSCHC, unless specifically approved by AmeriCorps. 	
Sub Reference:	Waivers (45 CFR §2540.207)	
	<ul style="list-style-type: none"> If the program uses any AmeriCorps' pre-approved NSCHC waivers (as listed in the NSCHC Manual, effective May 1, 2021), the policy correctly describes the terms of the pre-approved waivers used, and are the references current. 	
	<ul style="list-style-type: none"> If the program has any individual- or program-level waivers approved by AmeriCorps, whether expired or current, the policy references such waivers and requires that appropriate documentation be retained. 	
Sub Reference:	Training (Program-Specific Terms and Conditions)	
	<ul style="list-style-type: none"> The policy requires that at minimum one staff person who has some responsibility for NSCHC compliance take the AmeriCorps-designated e-Course annually on behalf of the organization and retain documentation of e-Course completion. 	
	<ul style="list-style-type: none"> The policy identifies staff position(s) with responsibility for the NSCHC process. 	
Sub Reference:	AmeriCorps-Approved Vendor Accounts	
	<ul style="list-style-type: none"> If using an AmeriCorps-approved vendor Truescreen or Fieldprint, the policy supports management and continuity of the account(s), i.e. lists the individuals with account access, ensures access is transferred from exiting employees, references vendor contact information, etc. 	
Sub Reference:	Monitoring	
	<ul style="list-style-type: none"> If applicable, the policy includes a process for monitoring sub-recipients and/or service locations if they are responsible for any part of the NSCHC process. 	
Sub Reference:	Policy Maintenance	
	<ul style="list-style-type: none"> The policy includes a process for being updated to ensure it reflects current regulations, guidance, and program practices, including the staff position(s) responsible. 	
References:		
Notes:		

Recommendations for Improvement:		
09.02 NSCHC Training		
09.02.01	Has at least one staff member completed the required NSCHC e-course training within the past year?	
References:	Grant Specific Terms and Conditions: Section on National Service Criminal History Check Training	
Notes:	The Certificate of Completion submitted is not dated within one day prior to the date of this request or within the past year of this request.	
Recommendations for Improvement:		
09.03 NSCHC Records		
09.03.01	Were all NSCHC records compliant? Enter the number of issues found for each issue below.	
References:	45 CFR 2540.200-207	
	Total number of records with noncompliance.	
Sub Reference:	Check components (45 CFR § 2540.204)	
	• Missing NSOPW check	
	• Missing state of service check	
	• Missing state of residence check	
	• Missing FBI check	
Sub Reference:	Check sources (45 CFR § 2540.204)	
	• NSOPW check not from approved source	
	• State check not from approved source	
	• FBI check not from approved source	
Sub Reference:	NSOPW nationwide (45 CFR § 2540.204)	
	• NSOPW check missing reporting jurisdictions	
Sub Reference:	Name-based checks (45 CFR § 2540.204)	
	• Missing valid name documentation	

	<ul style="list-style-type: none"> • NSOPW check name does not match name documentation 	
	<ul style="list-style-type: none"> • Name-based state check name does not match name documentation 	
	<ul style="list-style-type: none"> • Name-based FBI check name does not match name documentation 	
Sub Reference:	Timing (45 CFR § 2540.205)	
	<ul style="list-style-type: none"> • NSOPW check not adjudicated on time 	
	<ul style="list-style-type: none"> • State check not adjudicated on time 	
	<ul style="list-style-type: none"> • FBI check not adjudicated on time 	
Sub Reference:	Review and eligibility determination / adjudication (45 CFR §2540.205)	
	<ul style="list-style-type: none"> • NSOPW check not adjudicated 	
	<ul style="list-style-type: none"> • State check not adjudicated 	
	<ul style="list-style-type: none"> • FBI check not adjudicated 	
	<ul style="list-style-type: none"> • Fieldprint adjudicated without viewing results 	
Sub Reference:	Consent (45 CFR § 2540.206)	
	<ul style="list-style-type: none"> • Missing consent documentation 	
	<ul style="list-style-type: none"> • Consent form not signed before state/FBI checks conducted 	
Sub Reference:	Notice that selection contingent upon review of NSCHC results (45 CFR § 2540.206)	
	<ul style="list-style-type: none"> • Missing documentation of notice that selection is contingent on NSCHC results 	
Sub Reference:	Documentation of eligibility if vendor's adjudication recommendation does not endorse the candidate (45 CFR § 2540.202; 45 CFR § 2540.205)	
	<ul style="list-style-type: none"> • Truescreen NSOPW not in pass status and missing documentation candidate is eligible to serve/work 	
	<ul style="list-style-type: none"> • Truescreen state check not in pass status and missing documentation candidate is eligible to serve/work 	
	<ul style="list-style-type: none"> • Fieldprint check not cleared and missing documentation candidate is eligible to serve/work 	
Sub Reference:	Waiver (45 CFR § 2540.207)	
	<ul style="list-style-type: none"> • Noncompliant with terms of approved NSCHC waiver 	
Sub Reference:	Eligibility (45 CFR § 2540.202)	
	<ul style="list-style-type: none"> • Individual appears ineligible from NSCHC results 	
Sub Reference:	Other	
	Other	
Notes:		
Recommendations for Improvement:		

Additional Monitoring Comments

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Prohibited Activities

Monitoring Activity - Prohibited Activities

Prohibited Activities

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

10.01. PROHIBITED ACTIVITIES

10.01.01	Do member/volunteer service activities align with their position descriptions/assignment plans?	
References:	General Prohibited Activities References General: 45 CFR 2540.100; 45 CFR 1226.8; 45 CFR 1226.10 Exceptions: 45 CFR 1226.9	
Notes:		
Recommendations for Improvement:		
10.01.02	Are members/volunteers, site supervisors, and prime staff aware of prohibited activities applicable to their respective programs?	
References:	General Prohibited Activities References General: 45 CFR 2540.100; 45 CFR 1226.8; 45 CFR 1226.10 Exceptions: 45 CFR 1226.9	
Notes:		
Recommendations for Improvement:		
10.01.03	Do prime staff provide appropriate training to members/volunteers on prohibited activities?	
References:	General Prohibited Activities References General: 45 CFR 2540.100; 45 CFR 1226.8; 45 CFR 1226.10 Exceptions: 45 CFR 1226.9	
Notes:		
Recommendations for Improvement:		
10.01.04	Do prime staff provide appropriate training to site supervisors on prohibited activities?	
References:	General Prohibited Activities References General: 45 CFR 2540.100; 45 CFR 1226.8; 45 CFR 1226.10 Exceptions: 45 CFR 1226.9	
Notes:		
Recommendations for Improvement:		
10.01.05	Do site supervisors provide appropriate oversight of the members/volunteers with regard to prohibited activities?	

Prohibited Activities

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

Prohibited Activities

Notes:	
Recommendations for Improvement:	
Additional Monitoring Comments	

Monitoring Activity - New to AmeriCorps Grantee

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

11.01: REPORTING

11.01.01	Review the sponsor's/grantee's chart of accounts. Can the sponsor/grantee segregate revenue and expenses by project or grant? If NO, describe the deficiency in the notes section below.	
References:	2 CFR 200.302; 2 CFR 200.328	
Notes:		
Recommendations for Improvement:		
11.01.02	Does the sponsor/grantee have a policy and procedure to manage Federal cash drawdowns?	
References:	2 CFR 200.305	
Notes:		
Recommendations for Improvement:		
11.01.03	If there is a policy and procedure to manage cash drawdowns, do they include the following minimum elements? <ul style="list-style-type: none"> • Cash is drawn on a reimbursement or 'as-needed' basis, and not drawn in advance of need • The Non-Federal entity minimizes the time between drawing down and dispersal of cash • Procedural steps that outline the approval and drawdown process, including who is responsible for each action 	
References:	2 CFR 200.305	
Notes:		
Recommendations for Improvement:		
11.01.04	Review the Segregation of Duties Worksheet filled out by the sponsor/grantee. Does there appear to be adequate segregation of duties amongst staff for key financial functions?	
References:	2 CFR 200.303	
Notes:		

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Recommendations for Improvement:		
11.01.05	Does the sponsor's/grantee's written financial policies explicitly state the internal controls in place, consistent with the workbook's results?	
References:	2 CFR 200.303	
Notes:		
Recommendations for Improvement:		
11.01.06	<p>Is the grantee compliant with the Standards for Documentation of Personnel Expenses (e.g. Timekeeping)?</p> <p>Consider the sponsor's/grantee's policies around documentation of personnel expenses and sample timesheet. Does the combination of the provided information reflect the necessary components for documentation of personnel expenses as outlined below?</p> <ul style="list-style-type: none"> • Charges to the grant for salaries and wages are based on records (e.g. timesheets) that accurately reflect the work performed. These records must: <ul style="list-style-type: none"> o Be supported by a system of internal control that provides reasonable assurance that charges are accurate, allowable, and properly allocated. o Incorporated into the official records of the organization o Reasonably reflects the total activity for which employee is compensated o Comply with the grantee's accounting policies and practices • For an employee who is billed less than 100% to the grant, salary or wages are allocated to specific activities or cost objectives 	
References:	2 CFR 200.430, 2 CFR 200.431, 2 CFR 200.413(c), 2 CFR 200.416, 2 CFR 200.430(i)	
Notes:		
Recommendations for Improvement:		
11.01.07	Does the sponsor/grantee have a procurement policy?	
References:	2 CFR 200.317-327	
Notes:		
Recommendations for Improvement:		
11.01.08	<p>If there is a policy, does it include the following minimum elements?</p> <ul style="list-style-type: none"> • Standards of conduct that cover at minimum conflicts of interest and disciplinary actions to be applied for violations of such standards • Delineation of purchase thresholds, • Single source provisions, and • Necessary affirmative steps to assure minority businesses, women's business enterprises, and labor surplus area firms are used when possible 	

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References:	2 CFR 200.317-327	
Notes:		
Recommendations for Improvement:		
11.01.09	Does the grantee have a policy or procedure on how they will monitor their sites (subrecipients, host sites, service locations, operating sites, etc.) to ensure compliance with AmeriCorps and grant	
References:	2 CFR 200.332 (b, d, g-h)	
Notes:		
Recommendations for Improvement:		
11.01.10	Does the policy describe:	
	<ul style="list-style-type: none"> • The reports, both financial and programmatic, that will be collected and reviewed by the grantee; • How the grantee will follow-up and ensure that any findings or issues uncovered during an audit, site visit, or by other means are resolved; and • How management decisions are issued for audit findings pertaining to the Federal award provided to the subrecipient from the pass-through entity. 	
References:	2 CFR §200.332 (d);2 CFR §200.521	
Notes:		
Recommendations for Improvement:		
11.02: Program Specific		
11.02.01	Is there documentation to show that the recipient maintains a procedure for the filing and adjudication of grievances in alignment with 45 CFR § 1225? Documentation should outline the following at minimum:	
	<ul style="list-style-type: none"> • Time frames for filing and response • Person who receives and responds to the complaints both informal (grantee personnel) and formal (EEO Director of AmeriCorps or AmeriCorps designee) • Documentation required • Legal representation is allowed • Freedom from retaliation/reprisal • The process involved from initial filing, review, decisions made, corrective action, through close out 	
References:	45 CFR 1225	
Notes:		
Recommendations for Improvement:		
11.02.02	Does the organization have a non-discrimination policy that includes all of the federally required protected classes as listed below? *NOTE: Updated in the AmeriCorps Program Civil Rights and Non-Harassment Policy 11/7/23. Compliance should be determined based on grant award requirements.	
	<ul style="list-style-type: none"> • Race 	

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	<ul style="list-style-type: none"> • Color • National origin • Gender/gender identity or expression/sex • Age • Religion • Sexual orientation • Disability • Political affiliation • Marital or parental status • Reprisal* • Genetic information • Military service • Pregnancy* • Submission of a complaint* 	
References:	AmeriCorps Annual General Terms and Conditions	
Notes:		
Recommendations for Improvement:		
11.02.03	Does the grantee notify members, community beneficiaries, applicants, program staff, and the public, including those with impaired vision or hearing, that it operates in accordance with federal and program requirements on non-discrimination?	
	Does the policy summarize the requirements, note the availability of compliance history information, and explain the procedures for filing discrimination complaints with AmeriCorps?	
	Does the policy include information on civil rights requirements, complaint procedures and the rights of beneficiaries in member/volunteer service agreements, handbooks, manuals, pamphlets, and post it in prominent locations, as appropriate?	
	Does the sponsor/grantee notify the public in recruitment material and application forms that it operates its program or activity subject to nondiscrimination requirements?	
References:	AmeriCorps Annual General Terms and Conditions, relevant program regulations: 45 CFR Parts 2540 (ASN), 45 CFR 2551 (SCP), 45 CFR 2552 (FGP), 45 CFR 2553 (RSVP), and 45 CFR 2556 (VISTA).	
Notes:		
Recommendations for Improvement:		
11.02.04	Does the grantee have a system to follow required timekeeping practices for their members/volunteers?	
	For ASN: Member fundraising time is limited to 10% of the maximum allowable number of service hours, and member training is limited to 20% or less of the total aggregate agreed-upon member service hours in the program. Does the program have a process and corresponding timekeeping documentation for ensuring member hours are tracked and do not exceed the percentage limits for:	
	o Fundraising	
	o Member education and training	
	• For VISTA: <ul style="list-style-type: none"> • Is there evidence that VISTAs, Summer Associates, and/or VISTA Leaders are serving full-time, as defined by the host site? (Does the sponsor define full-time service? Does timekeeping documentation reflect full-time service of members?) 	

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	<ul style="list-style-type: none"> • Is there evidence that the grantee is documenting time attendance in relation to all variations of allowed Leave benefits for VISTA members? (Does timekeeping documentation show a way to document all variations of leave?) 	
	•For AmeriCorps Seniors: Does the grantee maintain timesheets or electronic time and attendance records that:	
	o Display the actual hours served by each volunteer	
	o Are signed or validated by the individual volunteer and the responsible volunteer station supervisor (on the template, is there a place for signatures / certification?)	
References:	ASN - 45 CFR 2520.45 and 45 CFR 2530.50 ACS: 45 CFR 2552.51 VISTA: DVSA Sec. 104, 42 U.S.C. § 4954 (a), 45 CFR 2556.205, VISTA Member Handbook Chapter 1	
Notes:		
Recommendations for Improvement:		
11.02.05	Do prime staff provide appropriate training to site supervisors on prohibited activities?	
References:	General: 45 CFR 2540.100/45 CFR 1226.8; 45 CFR 1226.10; 45 CFR 1226.11 (training); 2 CFR 200.303(c), 2 CFR 200.329(a) Exceptions: 45 CFR 1226.9	
Notes:		
Recommendations for Improvement:		
11.02.06	If applicable, does the grantee/sponsor have a finalized template for subrecipient agreements?	
References:	2 CFR 200.332	
Notes:		
Recommendations for Improvement:		
11.02.07	Does the subrecipient agreement template contain all the required elements:	
	• Clear identification as a subaward	
	• Federal Award Identification	
	• All requirements imposed by the pass-through entity on the subrecipient so that the Federal award is used in accordance with Federal statutes, regulations and the terms and conditions of the Federal award	
	• Any additional requirements that the pass-through entity imposes on the subrecipient in order for the pass-through entity to meet its own responsibility to the Federal awarding agency including identification of any required financial and performance reports	
	• An approved federally recognized indirect cost rate negotiated between the subrecipient and the Federal Government or, if no such rate exists, either a rate negotiated between the pass-through entity and the subrecipient (in compliance with this part), or a de minimis indirect cost rate as defined in 200.414 Indirect (F&A) costs, paragraph (f)	

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	<ul style="list-style-type: none"> • A requirement that the subrecipient permit the pass-through entity and auditors to have access to the subrecipient's records and financial statements as necessary for the pass-through entity to meet the requirements of this part; and • Appropriate terms and conditions concerning closeout of the subaward. 	
References:	2 CFR §200.332 (a); 2 CFR § 200.344	
Notes:		
Recommendations for Improvement:		
11.02.08	If applicable, does the grantee/sponsor have a finalized template for service site/volunteer station agreements/MOU's? (For ASN select Compliant; if there is no template, select Compliant and write in a Recommendation for Improvement.)	
References:	45 CFR 2551.23 45 CFR 2552.23 45 CFR 2553.23	
Notes:		
Recommendations for Improvement:		
11.02.09	Does the service site agreement template contain all the required elements (compliant and recommendation for improvement for ASN if no)?	
References:	45 CFR §2551.23(c)(2) 45 CFR 2552.23 45 CFR 2553.23	
Notes:		
Recommendations for Improvement:		
11.02.10	(ASN Only) Does the grantee have a template for member service agreements?	
References:	ASN Terms and Conditions	
Notes:		
Recommendations for Improvement:		
11.02.11	Does the service agreement template contain all the required elements as follows (ASN only - N/A for VISTA and ACS)?	
	<ul style="list-style-type: none"> • Description of the member's role 	
	<ul style="list-style-type: none"> • The minimum number of service hours (as required by statute) and other requirements (as developed by the recipient) necessary to successfully complete the term of service and to be eligible for the education award 	

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	<ul style="list-style-type: none"> • The amount of the education award being offered for successful completion of the terms of service in which the individual is enrolling 	
	<ul style="list-style-type: none"> • Standards of conduct, as developed by the recipient or sub recipient 	
	<ul style="list-style-type: none"> • The list of prohibited activities, including those specified in the regulations at 45 CFR § 2520.65 	
	<ul style="list-style-type: none"> • The text of 45 CFR §§ 2540.100(e)-(f), which relates to Nonduplication and Nondisplacement 	
	<ul style="list-style-type: none"> • The text of 45 CFR §§ 2520.40-.45, which relates to fundraising by members; 	
	<ul style="list-style-type: none"> • Requirements under the Drug-Free Workplace Act (41 U.S.C. § 701 et seq.) 	
	<ul style="list-style-type: none"> • Civil rights requirements, complaint procedures, and rights of beneficiaries 	
	<ul style="list-style-type: none"> • Suspension and termination rules 	
	<ul style="list-style-type: none"> • The specific circumstances under which a member may be released for cause 	
	<ul style="list-style-type: none"> • Grievance procedures; and 	
	<ul style="list-style-type: none"> • Other requirements established by the recipient. 	
References:	ASN Terms and Conditions	
Notes:		
Recommendations for Improvement:		
11.02.12	Does the grantee recognize AmeriCorps support?	
	<ul style="list-style-type: none"> • Are projects visually identified as AmeriCorps (including, but not limited to logos, websites, social media, service gear and clothing) and following AmeriCorps brand guidelines? 	
	<ul style="list-style-type: none"> • Are members provided information that projects are part of AmeriCorps? 	
	<ul style="list-style-type: none"> • Are there alterations to AmeriCorps logos or other brand identities? If yes, did the grantee receive prior written approval from AmeriCorps? 	
	<ul style="list-style-type: none"> • If applicable, do agreements with subsites explicitly state the program is an AmeriCorps program? 	
References:	General Terms and Conditions	
Notes:		
Recommendations for Improvement:		
11.02.13	Has the VISTA Project Director completed the VISTA Sponsor Orientation and have site supervisors been adequately trained to manage members by the sponsor?	
References:	Memorandum of Agreement	
Notes:		
Recommendations for Improvement:		
11.02.14	Does the grantee/sponsor have a policy and procedure in place regarding the provision of reasonable accommodation for members and staff to ensure accessibility as per the federal requirements?	

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References:	45 CFR 1203, 45 CFR 1214, 45 CFR 1232, Rehabilitation Act of 1973: Sections 504, 508, Program Specific Terms and Conditions, Americans with Disabilities Act of 1990	
Notes:		
Recommendations for Improvement:		
11.02.15	Does the sponsor/grantee have a system (a plan or process) in place for ensuring accessibility to persons with Limited English Proficiency?	
References:	General Terms and Conditions, Executive Order 13166, 67 FR 64604, Title VI, Civil Rights Act 1964: Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons	
Notes:		
Recommendations for Improvement:		
11.03: NSCHC		
11.03.01	Does the organization have a policy or procedure describing the internal process for conducting NSCHC?	
References:		
Notes:		
Recommendations for Improvement:		
11.03.02	Does the NSCHC policy or procedure cover all recommended topics, as applicable?	
	The policy correctly explains who is subject to the NSCHC process (as applicable to the grant/program).	
	The policy correctly outlines the eligibility criteria / describes ineligible individuals as listed in 45 CFR § 2540.202.	
	Grantees may establish screening criteria beyond the NSCHC eligibility requirements specified in 45 CFR § 2540.202. If establishing screening criteria beyond the NSCHC eligibility requirements, the policy requires that the program ensure suitability criteria are consistent with state and Federal Civil Rights and nondiscrimination laws.	
	The policy correctly specifies what NSCHC components are required: (1) a nationwide check of the NSOPW.gov, (2) a check of the individual's state of residence and state of service, and (3) a fingerprint-based check of the FBI.	
	The policy identifies which AmeriCorps-approved sources will be used for all levels of NSCHC as listed in 45 CFR § 2540.204.	
	The policy explains the process used to determine the current first and last name used on a name-based check.	
	The policy describes how the program determines the applicant's state of residence.	
	If not using Truescreen, the policy includes a requirement to conduct a subsequent NSOPW.gov check if states/territories are not reporting when the initial check is run, OR a requirement to run statewide sex offender checks in the states/territories not reporting.	
	The policy explains the timing requirement: that all checks are conducted, reviewed, and an eligibility determination made by the recipient no later than the day before the start date of work or service.	
The policy requires the full NSCHC to be conducted again if an individual's relationship with the organization is terminated (break in work or service) for a period of more than 180 days.		

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	The policy describes the process for staff to review results and make an eligibility determination, including documenting when this takes place.	
	The policy ensures that staff requiring NSCHC are not responsible for reviewing and adjudicating their own check results.	
	If using the AmeriCorps-approved vendors, the policy describes the process to determine eligibility if a vendor's adjudication recommendation is 'not to recommend'.	
	If not using Truescreen, the policy describes the process for resolving any hits that have the same name as the applicant on the NSOPW.gov check.	
	The policy requires the program to obtain a person's consent before conducting the state and FBI components of the National Service Criminal History Check.	
	The policy describes how notice is provided to the individual that selection into the program is contingent upon the organization's review of the individual's NSCHC results.	
	The policy requires that a program provide a reasonable opportunity for the individual to review and challenge the factual accuracy of a result before action is taken to exclude the individual from the position.	
	The policy requires the program to provide safeguards to ensure the confidentiality of any information relating to the criminal history check, consistent with authorization provided by the applicant.	
	The policy requires the program to maintain documentation of the NSCHC as grant records.	
	The policy ensures that the individual is not charged for the cost of any component of a NSCHC, unless specifically approved by AmeriCorps.	
	If the program uses any AmeriCorps' pre-approved NSCHC waivers (as listed in the NSCHC Manual, effective May 1, 2021), the policy correctly describes the terms of the pre-approved waivers used, and are the references current.	
	If the program has any individual- or program-level waivers approved by AmeriCorps, whether expired or current, the policy references such waivers and requires that appropriate documentation be retained.	
	The policy requires that at minimum one staff person who has some responsibility for NSCHC compliance take the AmeriCorps-designated e-Course annually on behalf of the organization and retain documentation of e-Course completion.	
	The policy identifies staff position(s) with responsibility for the NSCHC process.	
	If using an AmeriCorps-approved vendor Truescreen or Fieldprint, the policy supports management and continuity of the account(s), i.e. lists the individuals with account access, ensures access is transferred from exiting employees, references vendor contact information, etc.	
	If applicable, the policy includes a process for monitoring sub-recipients and/or service locations if they are responsible for any part of the NSCHC process.	
	The policy includes a process for being updated to ensure it reflects current regulations, guidance, and program practices, including the staff position(s) responsible.	
References:		
Notes:		
Recommendations for Improvement:		
11.03.03	Do the grantee's responses to the NSCHC Record Review Form align with the submitted NSCHC policy when it comes to the following NSCHC components?	
	<ul style="list-style-type: none"> • Process for obtaining consent 	

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	<ul style="list-style-type: none"> • Process for running each check (vendor / repository) 	
	<ul style="list-style-type: none"> • Process for documenting adjudication 	
References:		
Notes:		
Recommendations for Improvement:		
11.03.04	Does the submitted NSCHC record demonstrate implementation of the organization’s NSCHC policy when it comes to the following NSCHC components?	
	<ul style="list-style-type: none"> • Process for obtaining consent 	
	<ul style="list-style-type: none"> • Process for running each check (vendor / repository) 	
	<ul style="list-style-type: none"> • Process for documenting adjudication 	
References:		
Notes:		
Recommendations for Improvement:		
11.03.05	Are all components of the submitted NSCHC record compliant?	
	Missing NSOPW check	
	Missing state of service check	
	Missing state of residence check	
	Missing FBI check	
	NSOPW check not from approved source	
	State check not from approved source	
	FBI check not from approved source	
	NSOPW check missing reporting jurisdictions	
	Missing valid name documentation	
	NSOPW check name does not match name documentation	
	Name-based state check name does not match name documentation	
	Name-based FBI check name does not match name documentation	
	NSOPW check not adjudicated on time	
	State check not adjudicated on time	
	FBI check not adjudicated on time	
	NSOPW check not adjudicated	
	State check not adjudicated	

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	FBI check not adjudicated	
	Fieldprint adjudicated without viewing results	
	Missing consent documentation	
	Consent form not signed before state/FBI checks conducted	
	Missing documentation of notice that selection is contingent on NSCHC results	
	Truescreen NSOPW not in pass status and missing documentation candidate is eligible to serve/work	
	Truescreen state check not in pass status and missing documentation candidate is eligible to serve/work	
	Fieldprint check not cleared and missing documentation candidate is eligible to serve/work	
	Noncompliant with terms of approved NSCHC waiver	
	Individual appears ineligible from NSCHC results	
	Other	
References:	45 CFR 2540 200-207	
Notes:		
Recommendations for Improvement:		
11.03.06	Has at least one staff member completed the required NSCHC e-course training within the past year?	
References:	Grant Specific Terms and Conditions: National Service Criminal History Check Training	
Notes:		
Recommendations for Improvement:		
11.03.07	Does the grantee utilize the AmeriCorps approved vendors Fieldprint and TrueScreen?	
References:		
Notes:		
Recommendations for Improvement:		
Additional Monitoring Comments		