



**Compliance  
Monitoring**

# AmeriCorps Seniors: Introduction to Monitoring

October 2024

# Agenda

## Introduction to Monitoring

- Who's Who of Monitoring and Compliance
- What is the Monitoring Process
- How to Find the Tools You Need
- How to Learn from Common Audit Findings
- How to Prepare with the Monitoring Self-Assessment



# AmeriCorps Seniors Grantee Resources



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Office of Regional Operations  
**AmeriCorps Seniors: Introduction to Monitoring**  
October 2024

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## GRANTEES AND SPONSORS Monitoring

< GRANTEES AND SPONSORS

- Criminal History Checks
- Evidence Readiness Resources
- Monitoring
- National Performance Measurement Core Curriculum

The Office of Monitoring independently monitors and tests AmeriCorps-funded grants, projects, and recipient organizations to ensure program activities are in compliance with Federal regulations and AmeriCorps policies. Our aim is to increase the capacity of both AmeriCorps and our funded organizations to comply with regulations and focus on what is important: serving communities across America.

This page hosts resources that our sponsors may need to access to comply with monitoring requests. While sponsors may access anything hosted on this page, we would like to emphasize that the development of our office means that future processes and resources may change.

Contact Information: [monitoring@americorps.gov](mailto:monitoring@americorps.gov)

### Resources

- [Office of Monitoring Public Report - 2020-2024](#) >
- [On-site Monitoring - At a Glance](#) >
- [Remote Monitoring - At a Glance](#) >
- [CAP At a Glance](#) >
- [Overview of Uniform Monitoring Package \(UMP\) \(Updated Annually\)](#) >
- [Office of Monitoring FAQ](#) >
- [FY24 UMP Grantee Resource](#) >

## Download Resources



[Presentation Slides](#)



[AmeriCorps Monitoring](#)



# Role and Responsibilities

*Who's Who of Monitoring and Compliance*

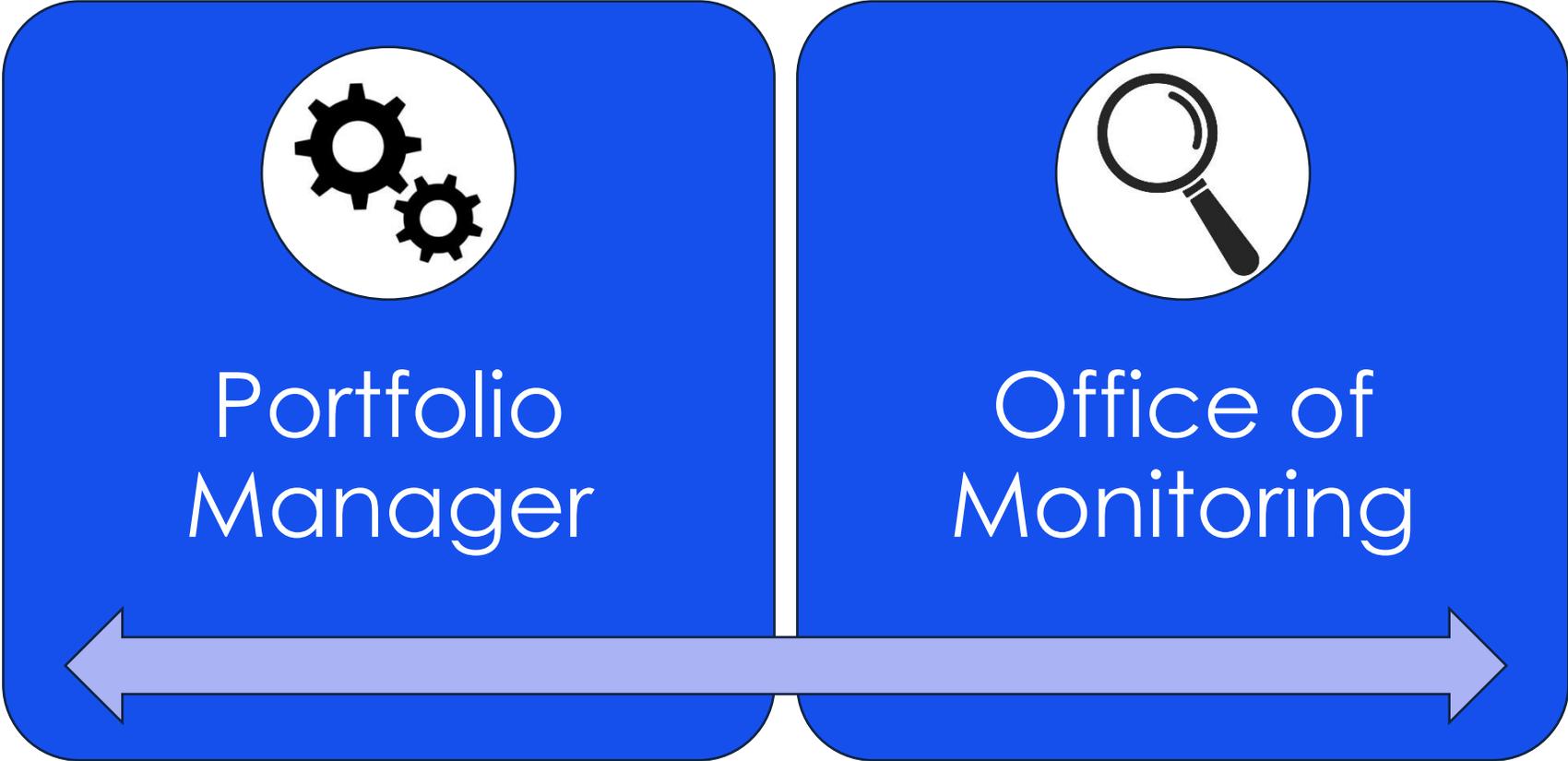


**AmeriCorps**  
**Seniors**

# Transformation & Sustainability Plan



## Introduction to Monitoring



# Roles and Responsibilities



## Introduction to Monitoring

**AmeriCorps  
Seniors HQ**

**Office of  
Regional  
Operations  
(ORO)**

**Office of Grant  
Administration  
(OGA)**

**Office of Chief  
Risk Officer  
(OCRO)**

**Office of  
Monitoring (OM)**

# Roles and Responsibilities



## Introduction to Monitoring

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AmeriCorps  
Seniors HQ

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Office of Regional  
Operations (ORO)

---

Office of Grant  
Administration  
(OGA)

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Office of Chief Risk  
Officer (OCRO)

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Office of  
Monitoring (OM)

# Roles and Responsibilities



## Introduction to Monitoring

### AmeriCorps Seniors HQ

- Informs the **development of policies and procedures for monitoring and oversight** of portfolio risk management in collaboration with OCRO, ORO, and OGA

Office of Regional  
Operations (ORO)

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Office of Grant  
Administration  
(OGA)

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Office of Chief Risk  
Officer (OCRO)

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Office of  
Monitoring (OM)

# Roles and Responsibilities



## Introduction to Monitoring

AmeriCorps  
Seniors HQ

**Office of Regional  
Operations (ORO)**

Office of Grant  
Administration  
(OGA)

Office of Chief  
Risk Officer  
(OCRO)

Office of  
Monitoring (OM)

- **Reviews submitted reports** such as Progress Reports, Progress Report Supplements, and Federal Financial Reports (FFR)
- Informs the **development of policies and procedures** for monitoring and oversight of portfolio risk management in collaboration with AmeriCorps Seniors HQ and OCRO

# Roles and Responsibilities



## Introduction to Monitoring

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AmeriCorps  
Seniors HQ

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- Performs **FFR cost reconciliation** during grant closeout

Office of Regional  
Operations (ORO)

**Office of Grant  
Administration  
(OGA)**

Office of Chief Risk  
Officer (OCRO)

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Office of  
Monitoring (OM)

# Roles and Responsibilities



## Introduction to Monitoring

AmeriCorps  
Seniors HQ

Office of Regional  
Operations (ORO)

Office of Grant  
Administration  
(OGA)

**Office of Chief Risk  
Officer (OCRO)**

Office of  
Monitoring (OM)

- Serves as **subject-matter experts in oversight and compliance** for AmeriCorps Seniors HQ and OGA
- **Establishes the policies and practices** related to award oversight and monitoring in collaboration with AmeriCorps Seniors HQ and OGA
- Develops and manages the **risk assessment tool, and issues instructions** to AmeriCorps staff for conducting risk assessment for all grants
- Ensures AmeriCorps policies, procedures, and support structures **provide the critical tools and guidance** necessary to facilitate a high quality, comprehensive, and consistent approach to monitoring AmeriCorps federal assistance awards (e.g., grants, cooperative agreements, sponsor agreements)
- Ensures that progress on the activities in the assessment timeline is tracked and communicated to staff through reports and other forms of **tracking and communication.**

# Roles and Responsibilities



## Introduction to Monitoring

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AmeriCorps  
Seniors HQ

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Office of Regional  
Operations (ORO)

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Office of Grant  
Administration  
(OGA)

---

Office of Chief Risk  
Officer (OCRO)

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**Office of  
Monitoring (OM)**

- **Conducts virtual and on-site monitoring** activities designed to ensure projects are in compliance with Federal regulations and AmeriCorps policies
- Coordinates with OCRO to apply a grant portfolio risk assessment that captures the varying levels of risk a recipient may pose to AmeriCorps in the areas of compliance, financial, organizational, and programmatic risk, which informs the **monitoring activities to be assigned to awards**.
- **Develops monitoring plans** in close collaboration with Program Offices and Office of Regional Operations (ORO) leadership
- Coordinates with ORO and other AmeriCorps offices to **ensure compliance issues are resolved**, including the assignment, review and approval of grantee corrective action plans when monitoring activities result in findings of noncompliance
- **Develops and provides summary information related to monitoring** activities to inform project decisions at the grantee, regional, and national level
- **Informs the development of policies and procedures** for monitoring and oversight of portfolio risk management in collaboration with AmeriCorps Seniors HQ and OCRO
- Develops and **manages the Uniform Monitoring Package (UMP), or Monitoring Toolkit**, consisting of monitoring tools for assessing grant compliance.



# The Process

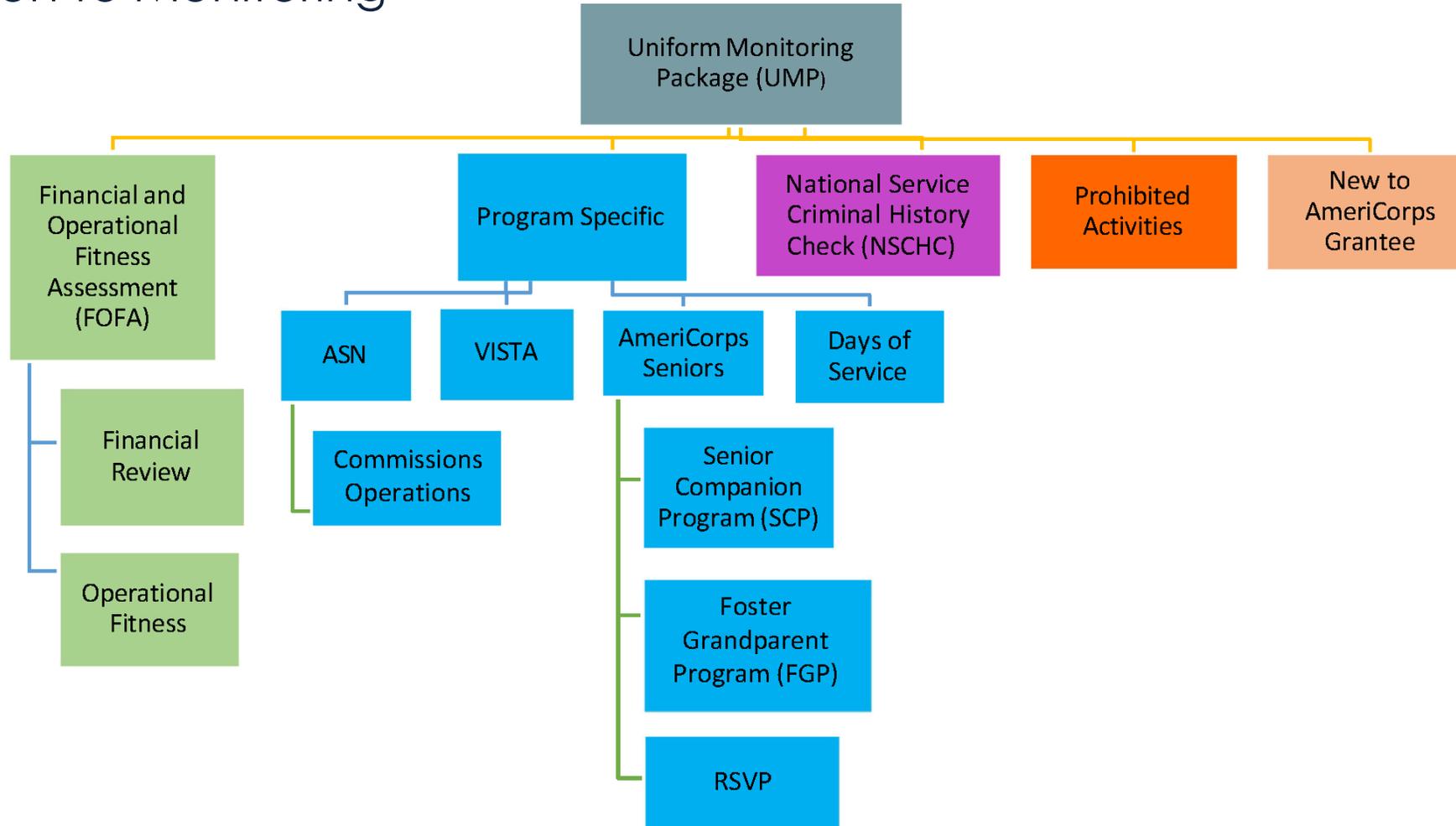
*How Oversight and Monitoring Works*



# Uniformed Monitoring Package



## Introduction to Monitoring



# Monitoring Process



## Introduction to Monitoring



# Monitoring Process

## Introduction to Monitoring



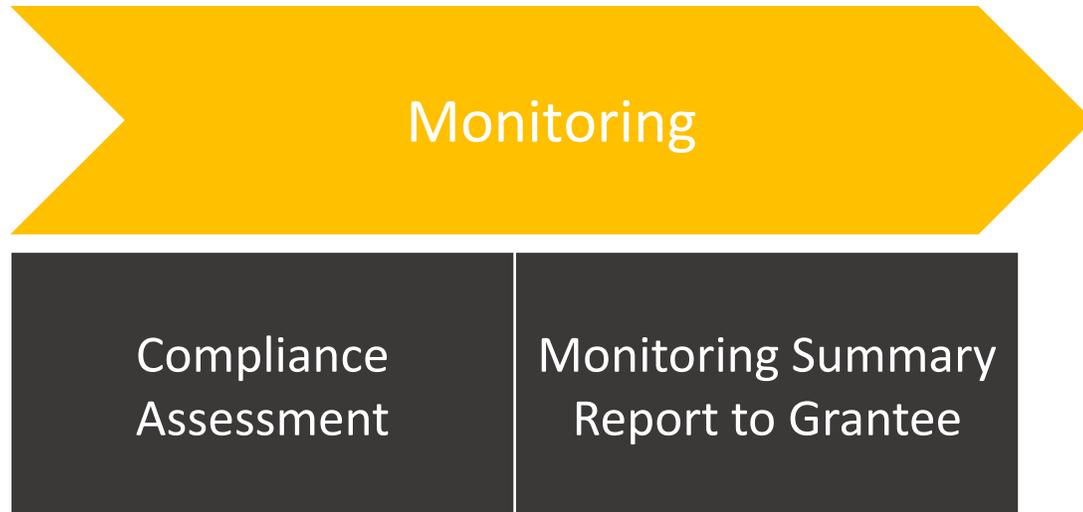
### Pre-Monitoring

Monitoring Activity Assignments	Grantee Notifications	Grantee Document Submission to OM	Document Review & Grantee Notification of Sample Selections
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- **Initial Notifications to Awardee**
- **Initial Document Submission from Awardee – 15 business days**  
**Document Review by Office of Monitoring – 15-20 day review timeline**
- **Supplemental Document Request to Awardee – 15 business days**
- **Interviews and Monitoring Assessment**

# Monitoring Process

## Introduction to Monitoring



- **Interviews and Monitoring Assessment**  
- 20-25 business days
- **Monitoring Report Submitted to Awardee**

# Monitoring Process

## Introduction to Monitoring



### Post-Monitoring & Closeout

If applicable, Grantee Corrective Action Planning	Grantee CAP Submission to OM	CAP Review & Approval	Grantee Notifications
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- **Corrective Action Planning (CAP)**  
**Submission from Awardee** – 20  
business days
- **CAP Review by Office of Monitoring** –  
10 business days
- **CAP Approval by Office of Monitoring**  
– within 3 months



# Tools and Resources

*How to Find the Tools You Need*



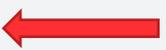
# Uniform Monitoring Package



## Introduction to Monitoring

### How do you access the Monitoring Self-Assessment:

1. Visit: [americorps.gov/grantees-sponsors/monitoring](https://americorps.gov/grantees-sponsors/monitoring)
2. Scroll down to the “Resources” section
3. Download the “[Overview of Uniform Monitoring Package \(UMP\)](#)”



GRANTEES & SPONSORS

# Monitoring

< GRANTEES & SPONSORS

Criminal History Checks

The Office of Monitoring independently monitors and tests AmeriCorps projects, and recipient organizations to ensure program activities align with Federal regulations and AmeriCorps policies. Our aim is to ensure AmeriCorps and our funded organizations to comply with regulations.

# Resources



- [On-Site Monitoring - At a Glance](#) >
- [Remote Monitoring - At a Glance](#) >
- [Overview of Uniform Monitoring Package \(UMP\)](#) >
- [Office of Monitoring FAQ](#) >
- [WebGrants Training](#) >

## Document Requests and Forms

- [Document Request Grantee Resource](#) >
- [Segregation of Duties Worksheet](#) >
- [New to AmeriCorps Grantee NSCHC Record Review Form](#) >
- [AmeriCorps Seniors Volunteer Roster](#) >
- [List of Subawards Worksheet](#) >

## Recordings and Slides about Monitoring and Corrective Action Planning

- [Overview of the Monitoring Process - Recording](#) >
- [Overview of the Monitoring Process - Slides](#) >

# Resources

- [On-Site Monitoring - At a Glance](#) >
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- [Overview of the Monitoring Process - Slides](#) >

# Uniform Monitoring Package (UMP)



**Office of Monitoring  
Overview of Uniform Monitoring Package  
Grantee Resource Guide**  
May 8, 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 grantees 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, grantees 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 grantees 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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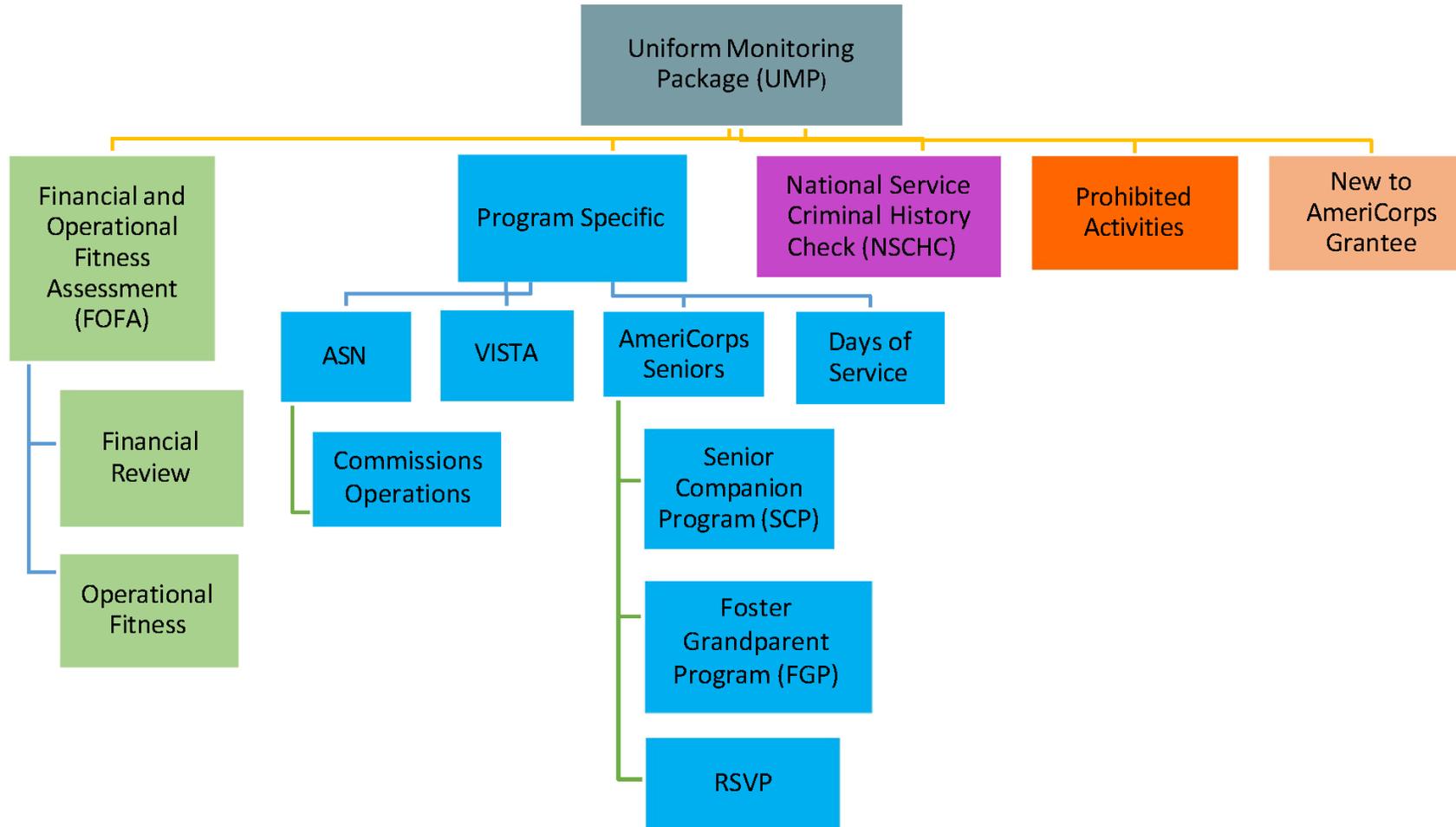
- Section 1 – Financial and Operational Fitness Assessment (FOFA)
- Program Specific
  - Section 3 – AmeriCorps State and National (ASN)
  - Section 13 – Commission Operations
  - Section 5 – VISTA
  - Section 6 – Senior Companion Program (SCP)
  - Section 7 – Foster Grandparents (FGP)
  - Section 8 – Retired and Senior Volunteer Program (RSVP)
  - Section 12 – Days of Service
- Section 9 – National Service Criminal History Check (NSCHC)
- Section 10 – Prohibited Activities
- Section 11 – New to AmeriCorps Grantee

Monitoring Activity - Financial and Operational Fitness (FOFA)	
Financial and Operational Fitness (FOFA)	
Should include reasoning (e.g. examples, document references, interview responses, etc.) for all compliance violations in the notes box below each question.	
REPORTING	
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?	
2 CFR 200.328, 2 CFR 200.302	
Questions for Note:	
Review the sponsor's/grantee's chart of accounts. Can the sponsor/grantee segregate revenue and expenses by project or grant?	
2 CFR 200.328, 2 CFR 200.302	
Questions for Note:	
MATCH/RECIPIENT SHARE	
Does the sponsor/grantee have a written policy that addresses how it treats match?	
2 CFR 200.306	
Questions for Note:	
If there is a written policy, does it include the following minimum elements?	
<ul style="list-style-type: none"> <li>• address how match is tracked and reported,</li> <li>• 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),</li> <li>• shows how in-kind donations are valued and recorded at fair market value.</li> </ul>	
2 CFR 200.306	

# Monitoring Activity Types



## Uniform Monitoring Package (UMP)



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## Uniform Monitoring Package (UMP)

Financial and Operational Fitness Assessment (FOFA)

Program Specific

- Section 3 – AmeriCorps State and National (ASN)
- Section 13 – Commission Operations
- Section 5 – VISTA
- Section 6 – Senior Companion Program (SCP)
- Section 7 – Foster Grandparents (FGP)
- Section 8 – Retired and Senior Volunteer Program (RSVP)

Section 9 – National Service Criminal History Check (NSCHC)

Section 10 – Prohibited Activities

Section 11 – New to AmeriCorps Grantee

# Table of Contents

## Uniform Monitoring Package (UMP)

### Financial and Operational Fitness

### Assessment (FOFA) - Pages 1-6



Monitoring Activity - Financial and Operational Fitness (FOFA)	
<b>Purpose and Approach</b>	The Financial and Operational Fitness Assessment (FOFA) includes both the Financial and Operational review sections and involves document review in the areas of federal reporting, match/recipient share, direct cost allocation, indirect cost rate, cash management and a cost test. The Monitoring Officer will request documents for review to identify the program's fiscal capacity and management of federal funds to ensure compliance with the Code of Federal Regulations, as well as the review of internal controls, financial record retention, timekeeping, and procurement.
<b>Financial and Operational Fitness (FOFA)</b>	
<b>01.01: REPORTING</b>	
<b>01.01.01</b>	Review the sponsor's/grantee's income statement or general ledger 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?
<b>References:</b>	2 CFR 200.328, 2 CFR 200.302
<b>01.01.02</b>	Review the sponsor's/grantee's chart of accounts. Can the sponsor/grantee segregate revenue and expenses by project or grant?
<b>References:</b>	2 CFR 200.328, 2 CFR 200.302
<b>01.02: MATCH/RECIPIENT SHARE</b>	
<b>01.02.01</b>	Does the sponsor/grantee have a written policy that addresses how it treats match?
<b>References:</b>	2 CFR 200.306
<b>01.02.02</b>	If there is a written policy, does it include the following minimum elements? <ul style="list-style-type: none"> <li>* address how match is tracked and reported,</li> <li>* 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),</li> <li>* shows how in-kind donations are valued and recorded at fair market value.</li> </ul>
<b>References:</b>	2 CFR 200.306
<b>01.02.03</b>	Review the sponsor's/grantee's income statement, 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?
<b>References:</b>	2 CFR 200.306
<b>01.03: DIRECT COST ALLOCATION METHODOLOGY</b>	
<b>01.03.01</b>	Does the sponsor/grantee have a written methodology that adequately describes how direct costs are allocated on a reasonable basis?

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## Uniform Monitoring Package (UMP)

### Program Specific

- Section 6 – Senior Companion Program (SCP) – **Pages 21-26**
- Section 7 – Foster Grandparents (FGP) – **Pages 27-32**
- Section 8 – Retired and Senior Volunteer Program (RSVP) – **Pages 33-37**

Monitoring Activity - SCP Programmatic	
<b>Purpose and Approach</b>	The Senior Companion Program (SCP) review assesses the soundness of grantee policies, procedures and adherence to regulations in 45 CFR 2551, 45 CFR 2450, and other assurances, certifications, prohibitions, and regulatory requirements. The Monitoring Officer will request documents and conduct interviews to identify the program's capacity to execute federal funds to ensure compliance with the Code of Federal Regulations.
Program-Specific (SCP)	
06: SCP VOLUNTEER MANAGEMENT - SCP Programmatic	
<b>06.01.01</b>	Do all volunteers meet the minimum age requirement at the time of enrollment?
<b>References:</b>	SCP Regulation: 45 CFR § 2551.41 (a)(1)
<b>06.01.02</b>	Are stipend volunteers all income eligible?
<b>References:</b>	45 § 2551.41(a)(2), 45 CFR 2551.43, 45 CFR § 2551.44
<b>06.01.04</b>	Review the volunteer assignment plans and complete the required interviews. Do the volunteer's service activities align with their plan?
<b>References:</b>	45 CFR §2551.71, 45 CFR § 2551.72, 45 CFR § 2551.73
<b>06.01.05</b>	Is there a designated supervisor providing regular and consistent support for each volunteer?
<b>References:</b>	SCP Regulation: 45 CFR §2551.62(f); §2551.71(a)(4)
<b>06.01.06</b>	Are supervisors adequately trained by the grantee to manage volunteers?
<b>References:</b>	SCP Regulation: 45 CFR §2551.62(f); §2551.71(a)(4),
<b>06.01.07</b>	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?
<b>References:</b>	45 CFR § 2551.72, § 2551.73, §2551.71(a) and (b)
<b>06.01.08</b>	For SCP, do Senior Companions who directly serve clients serve one or more eligible adults in a manner that: results in person-to-person

# Table of Contents

## Uniform Monitoring Package (UMP)

### Section 9 – National Service Criminal History Check (NSCHC) – Pages 38-40



Monitoring Activity - National Service Criminal History Check (NSCHC)	
<b>Purpose and Approach</b>	The NSCHC monitoring activity consists of three components: 1) Review of NSCHC policy or procedure to provide recommendations for improvement (not for compliance); 2) Review of e-course training certificate for compliance with grant specific terms and conditions; 3) Review of check records for covered individuals for compliance with 45 CFR §2540.200-207.
<b>NATIONAL SERVICE CRIMINAL HISTORY CHECK (NSCHC)</b>	
OM Staff should include reasoning (e.g. examples, document references, interview responses, etc.) for all compliance determinations in the notes box below each question.	
<b>09.01: NSCHC Policy</b>	
<b>09.01.01</b>	Does the organization have a policy or procedure describing the internal process for conducting NSCHC?
<b>References:</b>	
<b>09.01.02</b>	Does the NSCHC policy or procedure cover all recommended topics, as applicable?
<b>Sub Reference:</b>	<b>Covered Positions (45 CFR §2540.201)</b>
	• The policy correctly explains who is subject to the NSCHC process (as applicable to the grant/program).
<b>Sub Reference:</b>	<b>Eligibility (45 CFR §2540.202)</b>
	• The policy correctly outlines the eligibility criteria / describes ineligible individuals as listed in 45 CFR § 2540.202.
<b>Sub Reference:</b>	<b>Nondiscriminatory Screening Criteria (45 CFR §2540.203)</b>
	• 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.
<b>Sub Reference:</b>	<b>Check Components (45 CFR §2540.204)</b>
	• 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
<b>Sub Reference:</b>	<b>Timing (45 CFR §2540.205)</b>
	• 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.
<b>Sub Reference:</b>	<b>Review and Eligibility Determination / Adjudication (45 CFR §2540.205)</b>
	• 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 reviewing NSCHC are not responsible for reviewing and adjudicating their own check results.

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## Uniform Monitoring Package (UMP)

### Section 10 – Prohibited Activities – Pages 41-43



Monitoring Activity - Prohibited Activities	
<b>Purpose and Approach</b>	The Prohibited Activities monitoring review determines compliance regarding activities which are restricted, prohibited, must be adhered to for non-Federal entities receiving grant funds per 2 CFR 200 or AmeriCorps grants per 45 CFR 2520.65. This monitoring review is completed mainly through responses received via interviews (prime grantee staff, site supervisors, and members/volunteers), but also prohibited activity policies, evidence of training, and review of assignment descriptions. The Monitoring Officer will request documents and conduct interviews to identify the program's capacity to compliantly implement allowable grant-funded activities.
Prohibited Activities	
10.01. PROHIBITED ACTIVITIES	
<b>10.01.01</b>	Do member/volunteer service activities align with their position descriptions/assignment plans?
<b>References:</b>	General Prohibited Activities References General: 45 CFR 2540.100; 45 CFR 1226.8; 45 CFR 1226.10 Exceptions: 45 CFR 1226.9
<b>10.01.02</b>	Are members/volunteers, site supervisors, and prime staff aware of prohibited activities applicable to their respective programs?
<b>References:</b>	General Prohibited Activities References General: 45 CFR 2540.100; 45 CFR 1226.8; 45 CFR 1226.10 Exceptions: 45 CFR 1226.9
<b>10.01.03</b>	Do prime staff provide appropriate training to members/volunteers on prohibited activities?
<b>References:</b>	General Prohibited Activities References General: 45 CFR 2540.100; 45 CFR 1226.8; 45 CFR 1226.10 Exceptions: 45 CFR 1226.9
<b>10.01.04</b>	Do prime staff provide appropriate training to site supervisors on prohibited activities?
<b>References:</b>	General Prohibited Activities References General: 45 CFR 2540.100; 45 CFR 1226.8; 45 CFR 1226.10 Exceptions: 45 CFR 1226.9
<b>10.01.05</b>	Do site supervisors provide appropriate oversight of the members/volunteers with regard to prohibited activities?
<b>References:</b>	General Prohibited Activities References General: 45 CFR 2540.100; 45 CFR 1226.8; 45 CFR 1226.10 Exceptions: 45 CFR 1226.9
<b>10.01.06</b>	Do prime staff provide appropriate monitoring and oversight of service sites with regard to prohibited activities?
<b>References:</b>	General Prohibited Activities References General: 45 CFR 2540.100; 45 CFR 1226.8; 45 CFR 1226.10 Exceptions: 45 CFR 1226.9
<b>10.01.07</b>	Do interviews indicate that members/volunteers and prime staff do NOT engage in prohibited activities?

# Table of Contents

## Uniform Monitoring Package (UMP)

### Section 11 – New to AmeriCorps Grantees – Pages 44-55



Monitoring Activity - New to AmeriCorps Grantee	
<b>Purpose and Approach</b>	The New to AmeriCorps monitoring review is intended to assist grantees that have recently received AmeriCorps funding in setting their organizations up for successful and compliant program administration. Generally, grantees assigned this activity are organizations that have entered the AmeriCorps portfolio within the last calendar year. The activity is comprised of select questions from previously existing Monitoring Activities in the Uniform Monitoring Package including the Financial and Operational Fitness Assessment, Program Specific Activities, Prohibited Activities review, Subrecipient Activity, and National Service Criminal History Check review. Monitoring is completed in the same manner as the associated activities mentioned, however, is limited in scope to the review of policies, procedures, and select records only. Monitoring Staff requests documents and conducts follow up conversations with grantees as needed to assess the compliance in the initial set up of the program respective of regulations and requirements.
<b>New to AmeriCorps Grantee</b>	
<b>11.01: REPORTING</b>	
<b>11.01.01</b>	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.
<b>References:</b>	2 CFR 200.302; 2 CFR 200.328
<b>11.01.02</b>	Does the sponsor/grantee have a policy and procedure to manage Federal cash drawdowns?  If NO, briefly describe in the notes section below.
<b>References:</b>	2 CFR 200.305
<b>11.01.03</b>	If there is a policy and procedure to manage cash drawdowns, do they include the following minimum elements?  <ul style="list-style-type: none"> <li>• Cash is drawn on a reimbursement or 'as-needed' basis, and not drawn in advance of need</li> <li>• The Non-Federal entity minimizes the time between drawing down and dispersal of cash</li> <li>• Procedural steps that outline the approval and drawdown process, including who is responsible for each action</li> </ul>
<b>References:</b>	2 CFR 200.305
<b>11.01.04</b>	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?
<b>References:</b>	2 CFR 200.303
<b>11.01.05</b>	Does the sponsor's/grantee's written financial policies explicitly state the internal controls in place, consistent with the workbook's results?
<b>References:</b>	2 CFR 200.303
<b>11.01.06</b>	Is the grantee compliant with the Standards for Documentation of Personnel Expenses (e.g. Timekeeping)?  Consider the sponsor's/grantee's policies around documentation of personnel expenses, sample timesheets, and information provided



# Common Monitoring Findings

*Trends and Improvement Opportunities*



# Common Monitoring Findings

## Introduction to Monitoring

- #1** | Make sure current Memorandums of Understanding are on file for all volunteer stations where volunteers are serving.

FGP: [45 CFR 2552.23\(2\)](#)

RSVP: [45 CFR 2553.23\(2\)](#)

SCP: [45 CFR 2551.23\(2\)](#)



# Common Monitoring Findings

## Introduction to Monitoring

- #2** | Maintain documentation on file, updated annually, that shows that all enrolled volunteers meet the eligibility requirements.
- FGP/SCP: Age, Income, National Service Criminal History Check
  - RSVP: Age, Vehicle Insurance when appropriate

FGP: [45 CFR 2552.41](#) and [45 CFR 2552.42](#)

RSVP: [45 CFR 2553.41](#)

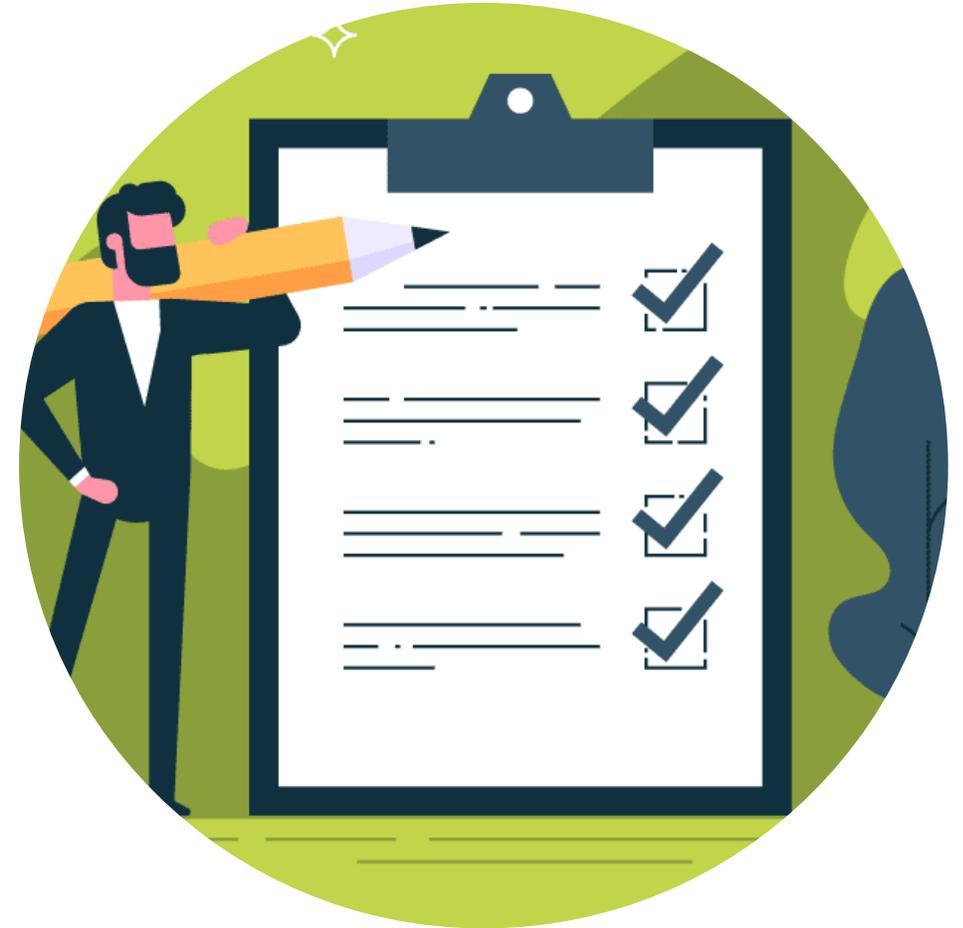
SCP: [45 CFR 2551.41](#) and [45 CFR 2551.42](#)



# Common Monitoring Findings

## Introduction to Monitoring

**#3** | Ensure there are written assignment descriptions on file for all volunteers.



FGP: [45 CFR 2552.72](#)

RSVP: [45 CFR 2553.62\(a\)](#)

SCP: [45 CFR 2551.72](#)

# Common Monitoring Findings

## Introduction to Monitoring

- #4** | Document the eligibility of beneficiaries of volunteer services, preferably in the assignment plan, and maintain these in the volunteer files.

FGP: [45 CFR 2552.81](#)

RSVP: [45 CFR 2553.23\(b\)](#)

SCP: [45 CFR 2551.81](#)



# Common Monitoring Findings

## Introduction to Monitoring

- #5** | Retain supporting source documentation for all volunteer local travel reimbursements.

FGP: [45 CFR 2552.46\(c\)](#)

SCP: [45 CFR 2551.46\(c\)](#)



# Common Monitoring Findings

## Introduction to Monitoring

- #6** | Ensure your organization's written policies and your implementation procedures for National Service Criminal History Checks are in compliance with the requirement. See Chapter 5 and the [Criminal History Check Resources webpage](#) carefully to be sure your written policies and your implementation procedures are in compliance and include adjudication.

FGP: [45 CFR 2552\(j\)](#)

RSVP: [45 CFR 2553.25\(i\)](#)

SCP: [45 CFR 2551\(j\)](#)



# Common Monitoring Findings

## Introduction to Monitoring

- #7** | Ensure appropriate time tracking documentation kept on file. Time tracking documents should clearly show that any time spent on non-grant or unallowable activities, such as fund raising or working on other sponsor projects, has been appropriately allocated to other sponsor accounts.

FGP: [45 CFR 2552\(j\)](#)

RSVP: [45 CFR 2553.25\(i\)](#)

SCP: [45 CFR 2551\(j\)](#)



# Common Monitoring Findings

## Introduction to Monitoring

- #8** | Ensure that there is clear documentation of how volunteer service hours and other cost reimbursements were tracked and these records are on file.



FGP: [45 CFR 2552.51](#) and [45 CFR 2552.46](#)

SCP: [45 CFR 2551.51](#) and [45 CFR 2551.46](#)

# Common Monitoring Findings

## Introduction to Monitoring

- #9 | Document receipt and valuation of all in-kind contributions counted toward the required non-Federal share of the grant.



# Common Monitoring Findings

## Introduction to Monitoring

- #10** | Submit all required reports, such as the Federal Financial Reports, Project Progress Reports and make sure they are on time.



RSVP: [45 CFR 2553.25\(g\)](#)

# Common Monitoring Findings

## Introduction to Monitoring

**#11** | Document your organization's policies and procedures, including internal financial controls, in a manual or handbook.





# Prepare for Monitoring

## *Next Steps*



# Uniform Monitoring Package



Introduction to Monitoring

## Next Steps

Complete Self-Assessment of the [Uniform Monitoring Package \(UMP\)](#)

Submit **Monitoring Self-Assessment Questions** by [Deadline]

Next training on [Date] at [Time] – **Register Today**



# Question & Answer

*What questions do you still have?*

