

# **GUIDE TO AMERICORPS PROGRAM MANAGEMENT**

**Montana State Commission**

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## CHAPTER 1

### INTRODUCTION TO PROGRAM MANAGEMENT

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## I. PROGRAM MANAGEMENT

## **A. Overview**

The purpose of this manual is to provide Montana State Commission (Commission) and Office of Community Service (OCS) staff with the basic operational policies and procedures to effectively select, monitor, and support AmeriCorps national service programs. The legal and regulatory requirements that underpin AmeriCorps national service are extensive and serve as the basic foundation by which the Montana Commission and AmeriCorps programs must operate. Indeed, it is the Commission's responsibility to clearly communicate AmeriCorps program requirements and expectations to all sub-grantees in Montana. This manual will assist Commission staff in doing so by clearly outlining the policies, procedures, and technical assistance opportunities that support quality and productive AmeriCorps programs. Although this document is primarily geared toward the OCS staff, AmeriCorps program staff will find this manual to be a valuable resource for understanding the basic expectations and requirements for operating AmeriCorps programs.

## **B. Manual Sections**

This manual consists of five areas: (1) Introduction to Program Management; (2) Grant Review, Schedule and Selection, (3) Program Monitoring; (4) Training and Technical Assistance; and (5) Grant Close-Out Procedures. Each of these areas is interdependent and collectively serves as the basis for effective AmeriCorps program management by the Commission and OCS staff.

**Grant Review and Selection** - A sound grant review and selection process is the first mechanism the Commission uses to ensure future program success. This section will outline the policies and procedures that make up Montana's grant review and selection process including proposal development, peer review, past performance review, program selection, negotiations, and notice of awards.

**Program Monitoring** - As a pass through entity, the Commission has a legal responsibility to monitor AmeriCorps programs in Montana. Indeed, effective monitoring is essential to continued program development and maturity. This section will outline the policies and procedures that comprise Montana's monitoring protocols including program and financial reporting, Commission and OCS staff, site visits, and remedial action.

**Training and Technical Assistance** - As a pass through entity, the Commission receives Program Development Assistance and Training (PDAT) funds to develop and maintain an infrastructure to enhance and sustain high quality national service/AmeriCorps programs. Training and technical assistance opportunities available to AmeriCorps programs funded through the Commission are outlined in this guide.

## CHAPTER 2

### GRANT REVIEW AND SELECTION

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# I. GRANT REVIEW INTRODUCTION

## A. OVERVIEW

The Commission recruits, reviews and selects quality national service programs that reflect the needs and priorities of the state as determined by the Commission and its constituents. In establishing state priorities, the Commission consults with its national service partners including the Corporation for National And Community Service - State Office, the Office of Public Instruction (OPI), and the Montana Campus Compact (MCC).

The Commission's decision to seek new applicants is based primarily on the availability of funds from the Corporation for National and Community Service (CNCS) and the capacity of the Commission to effectively monitor and support new AmeriCorps sub-grantees. There are two primary pools of funds available to potential AmeriCorps applicants: Competitive and Formula.

- **Competitive Funds** - Competitive funds are awarded to AmeriCorps applicants who successfully compete at both the state and national level. The Commission formally recommends programs for competitive funding and final decisions are made by the Corporation for National and Community Service in Washington D.C. Fund availability is determined by Congress and priorities are established by the CNCS.
- **Formula Funds** – Formula funds are awarded to AmeriCorps applicants who successfully compete at the state level. The Commission formally approves programs for formula funding and informs CNCS of its decisions. Fund availability is determined by Congress and allocated to the Commission on a formula basis – currently \$500,000 per year.

The competitive and formula grant cycles are held at different times of the year (competitive first) to allow the Commission some flexibility in programming formula funds. Regardless of the funding pool, AmeriCorps grants are renewable for up to three years at which time AmeriCorps programs must recompete for a second or third three-year cycle of funding.

## B. GRANT REVIEW PROCESS

The Commission utilizes a uniform grant review process designed to ensure that only the highest quality proposals that are in compliance with law, regulations, and grant requirements come forth from Montana. The uniform grant review process consists of the following components:

- Notice of funds available (NOFA);
- Informational meetings;
- Request for proposals (RFP);
- Intake assessment;
- Peer reviews;
- OCS staff reviews;
- Commission recommendations;
- Pre-award risk assessments;
- Negotiations; and

- Contract development

Various components of the grant review process may be omitted if the Commission does not seek new applicants for the upcoming program year.

### C. GRANT REVIEW SCHEDULE

The program officer will develop a grant review schedule prior to the start of the program year that clearly outlines anticipated grant review activities for the year. The grant review schedule will include submission deadlines for all applicant activities, proposed time frames for Commission and staff functions, and tentative dates for decisions.

Sample:

<b>DATE</b>	<b>ACTIVITY</b>
September	Prepare Application Materials (Competitive and Formula)
October	Prepare RFP mailing/informational meetings
November	Determine Peer Reviewers
January	Applications due to Commission
January	Staff intake assessment
January	Arrangements for peer reviewers
January	Staff review
February	Commission recommendations
February	Staff and peer feedback to potential grantees
March	Submissions to egrants (competitive)
June	Notice from CNCS of unsuccessful competitive applicants
June	Formula Applications submitted via egrants
July	Commission and CNCS grant negotiations
August	Pre-Award risk assessments
September	Contract development

## II. STANDARD GRANT REVIEW PROCESS

The following is a brief description of the many components of the grant review process:

### **A. NOTICE OF FUNDS AVAILABLE (NOFA) and REQUEST FOR PROPOSALS (RFP)**

When funds (NOFA) are available and as Commission capacity dictates, the Commission formally notifies the public of AmeriCorps funds availability (RFP) in the Fall of the year. This is accomplished through mail, press, and electronic media announcements. The RFP highlights the dates for AmeriCorps Competitive and Formula application deadlines, and introduces the grant process.

Primary responsibility: OCS Program Officer

### **B. INFORMATIONAL MEETINGS**

When contacted by potential applicants, the OCS conducts informational meetings for new program applicants in the early fall. The primary purpose of the informational meeting is to provide potential applicants with basic information regarding the AmeriCorps\*State program including programmatic requirements and grant review components.

Primary responsibility: OCS Program Officer

### **C. INTAKE ASSESSMENT**

OCS conducts an initial intake assessment for all new and continuation proposals that primarily checks the application for submission accuracy and compliance issues, such as match funds and indirect cost calculations. Proposals may be disqualified if required portions of the application are missing or incomplete (see Appendix for AmeriCorps grant compliance checklist).

Primary responsibility: OCS Program Officer

### **D. PEER REVIEWS**

The Commission utilizes a peer review process to evaluate new AmeriCorps proposals for both the competitive and formula grant cycles. Peer review groups are normally comprised of 3-4 grant readers who evaluate and score each new proposal according to an established scoring rubric. Peer review groups are generally chaired by one Commissioner and consist of 2-3 professionals from the nonprofit community with prior grant experience. In order to provide peer reviewers with the guidance to evaluate and select grants, each reviewer is required to attend an orientation that covers an overview of AmeriCorps and the grant selection process, and a discussion of peer reviewer roles. Peer reviewers are required to sign a "Conflict of Interest" form to ensure unbiased evaluation of proposals. Once all proposals have been read and scored, the peer review committee convenes to discuss results, rank proposals, and formalize recommendations to the OCS staff and the Policy, Program, Planning & Training Committee (PPPT). In most cases, continuation programs will not be peer reviewed (see Appendix for peer review guidelines, scoring rubric, and conflict-of-interest forms).



Primary responsibility: OCS Program Officer

## **E. STAFF REVIEWS**

OCS conducts a staff review of all new/re-compete and continuation AmeriCorps proposals. For all new/re-compete proposals, staff analyzes the results of the peer review and further scrutinizes the strengths and weaknesses of all proposals. For continuation proposals, staff conducts formal reviews of both past performance and future plans using standardized scoring sheets. For all re-compete proposals, staff considers past performance using standardized scoring sheets. Following staff reviews, OCS prepares formal funding recommendations that are presented to the Commission for consideration (see appendix for continuation score sheet and past performance sheet).

Primary responsibility: OCS Program Officer

## **F. COMMISSION RECOMMENDATIONS**

The Commission reviews OCS staff and PPPT Committee recommendations for all new and continuation proposals at a quarterly Commission meeting. At this time, the Commission may request additional information from staff and/or applicants. Although the Commission may recommend a proposal for funding, the Commission may also identify areas that must be addressed by the applicant prior to awarding a grant. The Commission concludes the meeting with formal grant recommendations.

Based on Commission decisions, OCS staff prepares written grant recommendations and submits the grant application to CNCS in Washington D.C. via the online granting system, egrants.

Primary responsibility: OCS Program Officer

## **G. NEGOTIATIONS**

Upon receipt of the Grant Award Review Process reports from the CNCS, OCS staff meets with the Program Officer at CNCS to discuss the results and clarify any issues, concerns, or non-compliance identified in the report. OCS in turn conducts negotiations with successful applicants. In some cases, applicants may be required to respond in writing to any issues or concerns identified at both the state and national level. This may include a budget resubmission depending on funding decisions at CNCS. Negotiations continue until OCS and CNCS determine that all issues, concerns, and non-compliance have been resolved.

Primary responsibility: OCS Program Officer

## **H. PRE-AWARD RISK ASSESSMENTS**

With all applicants, the Commission will conduct a pre-award risk assessment regarding financial and organizational capacity to administer federal grants with each successful AmeriCorps applicant. The information contained in the assessment is intended to help the Commission understand an applicant's agency/organization and to evaluate its overall operational and financial controls. OCS staff and the Commission will review all assessments prior to making a grant award. If the Commission determines that an applicant's operational and financial controls are

deficient, the Commission may postpone the grant award until sufficient remedial action is completed or refrain from awarding the grant altogether (see Appendix for the Pre-Award Risk Assessment).

Primary responsibility: OCS Program Officer

## **I. CONTRACT DEVELOPMENT/SIGNATORY PROCESS**

Sub-grantees awards are delivered as soon as possible after OCS receives the award letter from the Corporation for National & Community Service. Two originals of the contract will be prepared with the Executive Director of OCS signing. Both originals will be sent to sub-grantees for their signature, with the instructions that one will be returned to OCS. Funds are available once the contract or sub-grant is executed and are normally disbursed on a monthly or quarterly reimbursement basis.

## **J. APPEALS PROCESS**

### Montana Commission on Community Service Appeals Process

In the event the Peer Review committee does not recommend funding a sub-grant application, the following appeal procedure must be followed.

#### Appeal Procedure

The appeal procedure of the Commission is as follows:

- a. The Commission will notify proposal applicants of the Peer Review results, and subsequent Commission recommendation.
- b. If the applicant has substantive objections to the results of the Peer Review Group, the applicant may request a reconsideration of the recommendation by the Commission.
- c. A request for reconsideration of the Peer Review must be made to the Chair of the Commission.
- d. If a request for reconsideration is made, the Commission shall hear such additional information as may be deemed appropriate and pertinent to the matter involved. A delegation of not more than three representatives of the requesting applicant may present such additional information. In its discretion, the Commission may invite discussion or comments from others knowledgeable in the matter being appealed.
- e. The Commission shall send to the applicant, and others as deemed appropriate, its written determination pursuant to the request for reconsideration. Such determination shall be final.
- f. If an application, which has previously been rejected by the Commission, is submitted for reconsideration in a substantially altered condition, the Commission shall treat this grant as a new grant request, and all policies and procedures relating to a new grant will apply.

## CHAPTER 3

### PROGRAM MONITORING

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# I. MONITORING INTRODUCTION

## A. OVERVIEW

- The Commission's monitoring system is designed to ensure that the programs operate in a cost-effective and efficient manner. In order to remain in compliance and to ensure that AmeriCorps programs in Montana are operated in the manner prescribed by law and by AmeriCorps\*USA program guidelines, the Commission monitors its programs through various means to ensure that they are of the highest quality and meet the criteria listed in the grant provisions and cooperative agreement.
- Program staff should view this monitoring schedule as an opportunity to share accomplishments and promulgate progress towards objectives. The Commission is committed to identifying those areas within programs that can or should be improved and to work with programs to correct areas of concern. With this in mind, program staff should also understand that the Commission expects program staff to reciprocate in an appropriate manner and work with Commission staff to improve areas in question.

## B. METHODS

The Commission utilizes a variety of methods to monitor programs including: 1) program reports; 2) financial reports; 3) Commission site visits, and 4) regular communication. This chapter will outline the policies and procedures that guide each of these monitoring activities.

## C. MONITORING SCHEDULE

The Commission will develop a monitoring schedule near the start of the program year that clearly outlines anticipated monitoring activities for the year. The monitoring schedule will include submission deadlines for all required reports, proposed time frames for program site visits, tentative dates for program director conference calls, and any other relevant monitoring plans. The OCS Program Officer will consult with all program directors prior to establishing the monitoring schedule for the year. The Commission will ensure that monitoring activities coordinate with local program activities where appropriate and avoid conflicts with progress report timelines. The monitoring schedule will be distributed during the first quarter of the program year.

## II. PROGRAM PROGRESS REPORTING

### A. OVERVIEW

The Montana State Commission uses a variety of reporting methods to report and monitor programmatic developments including quarterly progress reports, the Grantee Progress Report, and National Service Trust forms. Copies of all reports and forms are kept on file at the Office of Community Service and CNCS.

### B. QUARTERLY PROGRESS REPORTS (APR)

AmeriCorps programs are required to submit four (4) progress reports to the State Commission. Based upon risk based management practices, continuing programs may be selected to submit only two or three progress reports per year. Progress reports monitor a program's progress toward meeting its annual program objectives, assess program strengths and challenges, highlight unique program achievements, and identify opportunities for training and technical assistance. Progress reports, generally due to the Commission by the 20<sup>th</sup> of corresponding months January, April, July and October, are reviewed by OCS staff and forwarded to CNCS as part of an aggregate report on December 1<sup>st</sup> annually.

The Commission expects that all progress reports are thoughtfully constructed in such a way that provides an accurate reflection of the program's accomplishments and challenges for the reporting period. At a minimum, programs must ensure that:

- All questions are answered;
- Program impact is clearly stated;
- Challenges are clearly outlined; and
- Measures to address challenges, improve the program, and/or comply with federal laws and regulations are clearly identified.

#### Progress Report Review Procedures

1. OCS Program Officer (PO) monitors Web Based Reporting System (WBRS) submission of all progress reports as stipulated in contract agreement.
2. PO reviews progress reports and requests rewrites where appropriate.
3. PO compiles aggregate progress report and forwards all program reports to the CNS Program Officer by the established deadline.
4. PO provides feedback to each program following the report submission (see Appendix for AmeriCorps Progress Reports (APR) feedback reporting form).
5. PO monitors remedial action.

## C. GRANTEE PROGRESS REPORT

The Grantee Progress Report is completed at the end of the program year and provides a concise picture of direct service accomplishments. Programs that begin in the summer or fall are required to submit their final quarterly reports by the 15<sup>th</sup> of October unless otherwise directed by the Commission.

### ❖ Grantee Progress Report Review Procedures

1. PO confirms receipt of final quarterly report on WBRS.
2. PO creates Grantee Progress Report for each grant type and submits into WBRS by established deadline.

## D. NATIONAL SERVICE TRUST FORMS

The required National Service Trust forms include the enrollment, end-of-term, and change of status forms. All forms must be completed and submitted on WBRS according to the timeframes identified in the subgrantee's contract and the AmeriCorps provisions. In general, enrollment forms must be submitted within 30 days of a member's enrollment, end-of-term forms must be submitted within 15 days of a member's exit, and change of status forms must be submitted immediately following a member's change in status. **All original forms signed by the members and the program director will remain on file with the sub-grantee for seven (7) years.**

Enrollment and end-of-term forms will be used by OCS and CNCS to compile demographic and descriptive data regarding the AmeriCorps member experience. All reports that are generated by the use of member data will be forwarded to the respective programs upon completion.

### ❖ National Service Trust Forms Review Procedures

1. PO monitors WBRS submission of all required Trust forms approximately once every other week.
2. PO contacts program if Trust forms are not being submitted within the established time frames.
3. PO monitors remedial action if necessary.

## E. RISK ASSESSMENT REVIEW

On at least an annual basis and as new projects are funded, Commission staff will assess the risk associated with each subgrantee using the Risk Assessment Review Form (see appendix). Monitoring of subgrantees will be based on risk assessed.

## III. PROGRAM FINANCIAL REPORTING

### A. OVERVIEW

The Commission and OCS uses several methods to monitor financial compliance including (1) Financial Status Reports, (2) Periodic Expense Reports, (3) Reimbursement Requests, (4) Budget Modification Requests, and (5) Audit Reports. Collectively, these methods provide OCS staff with the tools to assess and monitor the overall financial management of grant funds.

### B. FINANCIAL STATUS REPORTS AND PERIODIC EXPENSE REPORTS

All AmeriCorps programs are required to submit quarterly Financial Status Reports (FSR) and Periodic Expense Reports (PER) to OCS. Both OCS and the CNCS use each of these reports to monitor quarterly grant expenditures and matching requirements. FSRs are reviewed by Commission staff using a FSR Review Form and forwarded to CNCS as part of an aggregate financial report (4/30 and 10/30) in WBRS and egrants. Particular attention is paid to calculating match requirements and comparison of year-to-date expenditure totals to original and approved budgets. Copies of all FSR's are kept on file at OCS (see Appendix for FSR reporting form). Additionally, within 30 days of aggregate submission to CNCS, OCS will reconcile the WBRS/egrants reporting with the Department of Labor Payment Management System (PMS).

If requested, programs must provide back-up documentation required for quarterly Financial Status Reports (FSR) with In-Kind verification, plus any other documentation deemed appropriate by OCS staff.

FSRs are generally due to OCS by the 20<sup>th</sup> of each month following the end of the quarter.

#### ❖ FSR and Program Expenditure Summary Review Procedures

1. PO receives FSR's and PER's on WBRS and confirms receipt of financial reports with programs.
2. PO reviews FSRs and PERs of the reporting month using the FSR Review Form and requests clarification and/or revisions where appropriate.
3. PO provides written feedback concerning any clarification/revisions needed.
4. PO monitors remedial action.
5. Within 30 days of aggregate, PO reconciles WBRS with PMS.

### C. PROGRAM PAYMENTS

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

Programs must submit all payment requests on the Payment Request Form. Typically, programs can expect to receive payments within 7-10 calendar days after OCS receipt. Programs must project this timetable to avoid potential cash flow problems. Programs anticipating cash flow problems need to contact OCS as soon as possible. (A copy of the Payment Request Form and instructions are included in the Appendix.)

#### ❖ **Program Payment Review Procedures**

1. PO receives Payment Request form from program and reviews request for accuracy and consistency with the approved program budget.
2. PO either approves or disapproves request. If approved, PO signs request. If disapproved, PO contacts the program's fiscal person, communicates disapproval of request, and seeks clarification and/or revisions if appropriate. PO places disapproved payment request form in grant file.
3. Administrative Assistant makes two copies of approved payment request and delivers request to the fiscal support person in the Department of Labor and Industry (DLI).
4. Administrative Assistant places one copy of Payment Request in the Bill Chronology binder and delivers one copy to the PO for the grant file.
5. Administrative Assistant checks on a monthly basis with DLI to confirm payment to program.

#### **D. BUDGET MODIFICATIONS AND SLOT CONVERSIONS**

During the course of a budget year, programs may find it necessary to make changes to individual budget line items and/or convert approved and vacant AmeriCorps positions from full to part-time positions or vice versa. Budget revisions and slot conversions require prior OCS approval. For any changes, a full explanation must be provided including the reason for the change and what the adverse consequences would be if the request were denied. Programs are required to submit all budget modification and/or slot conversion requests on the Budget Modification/Slot Conversion Request form in WBRs.

Programs must obtain the prior written approval of the OCS and the CNCS before making the following budget modifications:

1. Reallocating funds from the "Member Support Costs" category (Category A) to other categories.
2. Reallocating training and education funds from the "Other Member Support Costs" category (Category B) to other categories.
3. Entering into sub-grants or contracting out any program activities funded by the grant and not specifically identified in the approved application and grant.
4. Transferring funds among cost categories, which causes any single category to increase or decrease more than 10 percent. Administrative and training related services cost limits may not be exceeded.
5. Purchasing of equipment over \$1000 using grant funds, unless specified in the approved application and budget.



Programs should not assume approval has been granted for any budget modification or slot conversion unless written documentation has been received from OCS.

❖ **Budget Modification/Slot Conversion Procedures**

1. PO receives Budget Modification/Slot Conversion Request form from program, reviews justification, seeks additional information from program if necessary, checks budget for accuracy, and makes initial approval/disapproval determination.
2. If approved, PO determines whether or not additional approval from CNCS is required. If CNCS approval is required, PO drafts CNCS approval request and sends request to CNCS Grants Officer for review of budget modifications or CNCS Program Officer for review of slot conversions.
3. If request is approved by OCS or CNCS, PO drafts appropriate documentation, sends documentation to program, places approval documentation in program's grant file, and notifies CNCS Grant and/or Program Officer of changes if prior CNCS approval was not necessary.
4. If request is disapproved by OCS or CNCS, PO notifies program, communicates disapproval of request, and seeks clarification and/or revisions if appropriate. PO places disapproved Modification Request form in grant file.
5. PO confirms slot conversion with the National Service Trust.

**E. AUDIT REVIEW**

OCS staff will review program audits, with aid as needed from DLI Fiscal Support Services. The review will determine whether financial operations are properly conducted, financial reports are fairly represented, and the program is complying with all applicable laws, regulations and administrative requirements that affect the expenditure of program funds. OCS audit review may include a financial site visit. If applicable, independent auditing will be conducted according to the Single Audit Act and OMB Circular A-133.

OMB Circular A-133 applies to all grantees of federal funds, including non-profit organizations, Institutes of Higher Learning, and state and local governments that expend \$500,000 or more in a year of federal awards. Essentially, all A-133 audits shall be performed annually. In some situations, under the old regulations, audits may be performed every two years.

Qualifying AmeriCorps programs must submit their A-133 audit reports to OCS within 120 days of the end of the program fiscal year.

❖ **Audit Review Procedures**

1. PO receives program audit report and documents receipt date on the Grant File Content Checklist (see appendix).
2. PO reviews audit report for any identified weaknesses or findings on the Grant File Content Checklist. PO contacts executive director for clarification if necessary.
3. If audit report does not identify weaknesses or findings, PO places one copy in grant file and

forwards one copy to the CNS Grants Officer.

4. If audit report identifies weaknesses or findings, PO sends letter to organization's executive director requesting a written plan for remedial action. Letter also requests follow-up documentation when remedial action is completed. PO places one copy of letter and report in grant file and forwards one copy of each to CNCS Grants Officer.
5. PO documents receipt of written plan for remedial action and places copy in grant file.
6. PO monitors written plan for remedial action.

## IV. COMMISSION SITE VISITS

### A. OVERVIEW

Commission members will conduct formal site visits to the central offices of all programs at least once every year. The Commission uses formal site visits to examine program operations and regulatory compliance. Additional visits to field operating sites will be conducted by both Commissioners and OCS staff. Field visits are less formal and focus primarily on program effectiveness.

### B. MONTANA PROGRAM REVIEW INSTRUMENT

The Montana Program Review Instrument (MPRI) covers AmeriCorps specific laws, provisions and other federal requirements. It contains five modules that cover reporting and communication compliance and early issue detection (Module A); Member documentation compliance (Module B); financial compliance (Module C); policies and procedures compliance (Module D); and program effectiveness compliance (Module E). The Montana Commission may use these modules independently, or as a complete tool, either as they are or modified to the context of Montana AmeriCorps programs and state requirements. (See Appendix for review instrument.) When using modules B and/or C (member documentation and fiscal compliance), Commission staff will record no less than three samples to support the instrument. In the case of module B, staff will record member files sampled and, if appropriate, names of members interviewed; in the case of module C, staff will record expenditures sampled to support program expenses.

In order to effectively use this tool, individuals performing the monitoring need to be familiar with AmeriCorps laws and regulations. To facilitate this understanding, items in the MPRI are referenced to the source of the requirement. Thus, those monitoring should carry copies of the National Community Service Trust Acts of 1990 and 1993, 45 CFR parts 2500–2599, AmeriCorps Provisions, Grant Policy Guidance #1–3, and a copy of the grant award letter and cooperative agreement.

### C. INTERVIEWS AND SURVEYS

Commission and OCS staff may use the site visit as an opportunity to conduct interviews and administer surveys with program staff, members, and service recipients. The questionnaires and surveys provide additional information for the Commission to use when assessing program effectiveness. If interviews or surveys are to be conducted during a visit, Commission and OCS staff will notify programs ahead of time as to who should be present for the visit and what activities are planned.

#### ❖ **PROGRAM OFFICER SITE VISIT PROCEDURE**

1. PO notifies the executive director, chief executive officer, or other official contact person in writing of the impending visit at least fifteen (15) business days prior to the site visit. PO forwards a copy to the program director.
2. PO contacts program director to confirm date of visit, discuss purpose of visit at least ten (10) business days prior to visit.
3. PO sends memorandum to the program director that outlines all final arrangements, points of discussion, and planned activities at least five business days (5) prior to visit.
4. PO reviews program's progress reports, site visit reports, and other relevant grant material prior to visit.
5. PO conducts site visit and exit interview.
6. PO sends thank you letter to the program director within five (5) business days of completed site visit. PO forwards a copy to the executive director, chief executive officer, or other official contact person for the organization.
7. PO sends a site visit report using the Monitoring Feedback Form to program director within fifteen (15) business days of the site visit. PO includes copies of MPRI checklists for reference. PO clearly outlines any site visit findings and remedial action that is required from sub-grantee in report.
8. PO monitors remedial action if applicable.

#### ❖ **COMMISSIONER SITE VISIT PROCEDURE**

1. Commissioner arranges site visit with program site supervisor at least fifteen (15) business days prior to the visit and notifies OCS PO of scheduled visit.
2. PO contacts program director to confirm date of visit at least ten (10) business days prior to visit.
3. Commissioner conducts site visit on scheduled date.
4. Commissioner sends thank you letter to the site supervisor within five (5) business days of completed site visit
5. Commissioner completes Commissioner Site Visit Report form and sends to PO within ten (10) business days of site visit.
6. PO reviews Commissioner Site Visit Report and follows-up with Commissioner if necessary.
7. PO sends a site visit report using the Monitoring Feedback Form to program director within fifteen (15) business days of the site visit. PO includes copies of Commissioner Site Visit Report form for reference. PO clearly outlines any site visit findings and remedial action that is required from sub-grantee in report.
8. PO monitors remedial action if applicable.

## V. REMEDIAL ACTION

### A. OVERVIEW

As a result of monitoring activities, the Commission may require programs to undertake remedial action to address non-compliance issues. The Commission may also identify areas for continuous improvement that do not require immediate remedial attention, but should be integrated into and addressed as part of a program's overall plan to continuously improve program quality. A program's demonstrated record of timely remedial action and progress toward continuous improvement will play an important role in the Commission's decision to renew program funding in subsequent years.

### B. POLICIES AND EXPECTATIONS

To the extent possible, the Commission will outline non-compliance and continuous improvement issues and request remedial action through the Monitoring Feedback Report form. The report will request a written response to all identified non-compliance issues from the program. Program responses should outline the specific steps the program will undertake to correct the identified problem(s) or compliance issue(s). In general, programs must remedy compliance issues within forty-five (45) days following the receipt of the Monitoring Feedback Report from the Commission. Exceptions to this timeframe will be considered on a case-by-case basis.

Programs must notify the OCS in writing when remedial actions have been completed. Further, programs are expected to report on remedial actions and continuous improvement efforts in their quarterly progress reports.

### C. FAILURE TO COMPLY

Failure to comply with the terms and conditions of the grant award and contract, including not meeting the established timeframes for remediation, may result in a reduction in program funds. Specific policies and consequences are outlined in all program contracts.

#### **Remedial Action Monitoring Procedures**

1. PO sends to the program director a site visit report that clearly outlines non-compliance issues, continuous quality improvement issues, and timeframes for completion. A copy of this report is placed in the grant file.
2. PO monitors receipt of program's response to the site visit report and reviews programs proposed steps to remedy issues. Program response is placed in grant file.
3. PO monitors programs completion of remedial action including receipt of final completion notice from the program. Completion notice is placed in grant file.
4. If the program fails to complete remedial action within the agreed upon timeframe, the PO will first send a written warning to the program requesting immediate attention and completion of remedial action within ten (10) business days of the program's receipt of warning.
5. If remedial action is not completed within ten (10) business days, the PO will temporarily suspend program payments until remedial action is completed.

## CHAPTER 4

### TECHNICAL ASSISTANCE

# I. TECHNICAL ASSISTANCE

The Montana Commission and OCS will deliver and administer training and technical assistance needs according to the Unified State Training Plan in order to raise the quality of national service programs in Montana. Major activities include:

- 1) Provide a State-wide Training Plan Calendar.
- 2) Provide annual Program Director Training.
- 3) Coordinate annual conference and trainings, such as the All Member Gathering, Community Building Institute, and the Governor's Conference on Civic Engagement.
- 4) Identify, index and access local, regional and national training resources.
- 5) Conduct Program Needs Assessments and Training Evaluations.

## CHAPTER FIVE

### CLOSE OUT PROCEDURES

# I. CLOSE OUT PROCEDURES

The Corporation for National & Community Service will require complete grant close out for all grants that have operated for a three year period. Federal regulations require the grant close out within ninety (90) days of the end of the grant. The Office of Community Service will notify programs of needed close out documents. In general, the documents will include:

1. Final Financial Status Report: SF 269 A: The final form may not be available on WBRS at the time of the program close out. The Final Financial Status Report must be cumulative, covering the entire grant period, and should reflect the required percentage of matching funds that the program staff had agreed to contribute under the terms of the grant.
2. Final Project Report.
3. Equipment Inventory of items purchased with Federal grant funds with a current per unit fair market value of \$5,000 or more, or a written statement that there are no such items.
4. Inventory of unused or residual supplies purchased with Federal grant funds which in the aggregate exceed \$5,000, or a written statement that such supplies (if any) do not exceed \$5,000.00.
5. Sub grantee Certification (if applicable).

In addition, if a program has drawn funds under the grant but not expended them, funds must be returned to OCS.

If the program secured a copyright or patent on any material or device paid for with funds awarded under this grant, programs must provide OCS with a written confirmation describing the specific nature of the copyright or patent obtained.

After OCS forwards the required documents to the CNCS, **OCS will advise the program in writing that the grant award is closed. Please note that the closeout of a grant does not affect: (1) the requirement to retain records pursuant to the grant provisions; (2) the requirement and right for audit pursuant to the grant provisions; (3) the right of the Corporation to disallow costs and recover funds on the basis of an A-133, A-128 or other audit or other review; and (4) the obligation of the grantee to return any funds due the Commission or Corporation as a result of later refunds, corrections, cost disallowance or other actions.**

## APPENDIX

- 0. AMERICORPS GRANTS COMPLIANCE CHECKLIST
- 0. PEER REVIEW GUIDELINES AND SCORING RUBRIC
- 0. CONFLICT OF INTEREST STATEMENT
- 0. CONTINUATION SCORE SHEET
- 0. PAST PERFORMANCE REVIEW
- 0. PRE-AWARD RISK ASSESMENT
- 0. APR FEEDBACK REPORTING FORM
- 0. FSR/PER REVIEW FORM
- 0. DRAW DOWN INSTRUCTIONS AND REQUEST FORM
- 0. MONTANA PROGRAM REVIEW INSTRUMENT
- 0. GRANT FILE CONTENT CHECKLIST
- 0. RISK ASSESSMENT REVIEW FORM