

Report No. 97-04

Date: November 25, 1996

CORPORATION

FOR NATIONAL



S E R V I C E

OFFICE OF THE INSPECTOR GENERAL

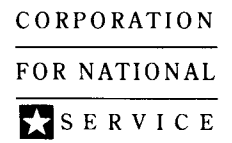
Review of

Corporation For National and Community Service
AmeriCorps Grant Number 94ADNMO017
To Fund
The Bridges Across the Heartland Program

This report is issued to CNS Management for resolution and follow-up. According to OMB Circular A-50, *Audit Follow Up*, the Corporation must make final management decisions on the report's findings and recommendations no later than July 28, 1997. Consequently, the reported findings do not necessarily represent the final resolution of the issues presented or the amount of disallowed costs.

The Inspector General must approve any request for public release of the report.

Office of the Inspector General
Report Number 97-04



November 25, 1996

Frank Beal
Acting Executive Director

Donna H. Cunninghame
Chief Financial Officer

CNS' Office of the Inspector General engaged Myint & Buntua, CPAs, an independent accounting firm, to perform a post award review related to CNS AmeriCorps National Direct Grant Number 94ADNMO017 to Kansas City Consensus to administer the "Bridges Across the Heartland" program. The purpose of the review was to assess KCC's accounting and management control systems to determine their ability to comply with Federal fiscal accounting and CNS grant requirements.

Myint and Buntua performed their review at KCC's headquarters in Kansas City, Missouri during December 1995, with additional follow-up procedures in June 1996. Their review was substantially less in scope than an audit and accordingly did not include elements essential to the expression of an opinion on KCC's financial and management control structure or to determine the propriety of costs charged to the CNS grant.

Myint and Buntua delivered a draft report and accompanying workpapers to CNS OIG on August 28, 1996. However, OIG review of the information contained therein revealed that in July 1996, CNS began to transfer the grant and the program from KCC to the YMCA of Greater Kansas City (the YMCA). CNS grant files indicate that the YMCA is the grantee for the program's third year.

Accordingly, considering the limited scope of the review and the subsequent changes in control of the grant, OIG reviewed Myint and Buntua's draft and the work upon which it was based and opted to issue this "letter report" rather than finalize a report with information rendered irrelevant by the transfer. The purpose of this letter report is to apprise the Corporation of conditions which may not have been addressed or corrected by the transfer of program oversight to the YMCA; specifically,

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Learn and Serve America
National Senior Service Corps

- KCC experienced a high degree of AmeriCorps Member attrition during the first two years of the program.
- Myint and Buntua reported several conditions relating to KCC's Federal financial reports and grant costs that were not reported by KCC's independent auditors. These conditions, an audit under Federal standards of the final months of operation of the grant, and final close out of KCC's fiscal responsibility need to be resolved by CNS grants management officials.
- The Myint and Buntua review revealed that KCC paid living allowances during the program's first year of operations to 36 AmeriCorps members whose names were not listed on CNS-produced AmeriCorps Member rosters. Failure to include individuals enrolled in a program understates CNS' statistics for the number of AmeriCorps Members and Member attrition rates.

We provided a draft of this letter report to CNS and to KCC for comment. CNS did not respond. KCC and the YMCA of Greater Kansas City responded with a jointly-issued letter and other information. We have included their letter in this report as Appendix A and forwarded the entire response to CNS for consideration in the audit resolution process.

Background

In FY 1994, CNS awarded KCC a grant of slightly more than \$1 million to fund the Bridges Across the Heartland program from July 1, 1994 through September 30, 1995. The program's purpose was to "improve the quality of life in Greater Kansas City Area by reducing crime, providing needed services, raising citizens's standards of living and assuring greater cooperation across the state lines of Kansas and Missouri."

According to the grant proposal, Corps Members were to be recruited from "at-risk" groups in the Greater Kansas City area to work in Trans-Agency Community Teams and coordinate the direct services of more than 20 non-profit service agencies. Fiscal management was to be provided by the Greater Kansas City Community Foundation and Affiliated Trusts. KCC records, however, indicate that in September 1994, KCC entered into an administrative services agreement with a Missouri not-for-profit corporation, the Full Employment Council, for fiscal record keeping services and to be the fiscal manager for the Bridges Across the Heartland program.

The grant was renewed for a second year and funded at \$690 thousand. According to CNS grant files, the \$690 thousand originally included a carryover of approximately \$333 thousand from the first year's funding. However, under Amendment 4 to the grant, executed in March 1996, although the grant amount for the second year remained at \$690 thousand, the amount of carry over funding was reduced by \$15 thousand and offset by an increase in CNS current year funding. In addition, as noted above, during the second year, CNS began transfer of the grant to the YMCA of Greater Kansas City. According to Amendment 5 of the grant, the program was renewed for a third year under the YMCA with funding at approximately \$646 thousand (including \$59 thousand in carryover funds from year two).

I. KCC experienced a high degree of AmeriCorps Member attrition during the first two years of the program.

Although the grant agreement for the period July 1, 1994 through September 30, 1995 stipulated that KCC would enroll 86 AmeriCorps Members, in the first year of the grant, only 32 completed a full year of service. Seventeen other Members completed less than a full year of service.

For the second year of the program's operations, KCC scaled down the number of subgrantees participating in the program, made what was described as "organization and structural changes" to the program, and expected to enroll about 50 AmeriCorps Members. However, Myint and Buntua reported that, at the time of their June review (during the second year of the grant), KCC had only 35 members.

The Myint and Buntua workpapers indicate that the program has recognized the need to reduce AmeriCorps Member attrition and implemented several new strategies in the program's third year of operations intended to address these matters. However, considering that failure to recruit and retain the agreed-upon number of members impairs a program's ability to achieve its goals, impedes the opportunity for AmeriCorps Members to earn their educational benefits, and ties up grant funds that could be awarded to other programs, we recommend that CNS --

- develop strategies that can be used by programs in retaining AmeriCorps Members recruited from "at risk" sectors of the community to improve their chances of completing their service and gaining their educational benefits;
- determine if this program has performed the year-end assessments required by the AmeriCorps provisions; and

- if so, assess the program's progress in achieving the objectives of its grant proposal.

Further, in reviewing the workpapers and CNS grant files that we noted that the Bridges Across the Heartland program assigns its AmeriCorps Members to a number of sites. Information in the CNS' grant files and in Myint and Buntua's workpapers indicates that as few as two or three AmeriCorps Members may be assigned to each of the sites -- a condition that CNS has recognized as increasing a program's difficulty in monitoring. However, when we contacted the CNS Program Officer responsible for oversight of this program in November 1996, she indicated that she had not recently performed an on-site monitoring visit.

Considering the risks related to recruiting from "at risk" communities, the difficulty of monitoring AmeriCorps Members assigned to diverse sites and activities, the program's history of attrition, and the change in the legal grantee, we further recommend that CNS' Program and Grants Management staff increase their monitoring of the Bridges Across the Heartland program.

In responding to a draft of this letter report, KCC and the YMCA agreed that the Bridges Across the Heartland program had experienced high attrition rates but cited "the significant effort" that has been put forth to resolve the problem.

As we stated above, we are aware that the program has reported significant efforts to reduce attrition and also that CNS has considered these reported efforts in renewing the grant. Nonetheless, Member attrition is a condition that increases the risk that education benefits may not be earned. Furthermore, turnover may also indicate problems in the program's design, implementation or management. Finally, as we mentioned above, CNS has identified risks related to monitoring AmeriCorps Members at single placement or widely dispersed sites. Accordingly, considering these risk factors, OIG continues to recommend that CNS' Program and Grants Management staff increase their monitoring efforts to include on-site monitoring visits and, as further discussed in finding II of this letter report, a close-out review of the grant years for which KCC was responsible.

II. *Myint and Buntua reported several conditions relating to KCC's Federal financial reports and grant costs that were not reported by KCC's independent auditors. These conditions, an audit under Federal standards of the final months of operation of the grant, and final close out of KCC's fiscal responsibility¹ need to be resolved by CNS grants management officials.*

As required by Federal regulations and CNS grant provisions, KCC engaged an independent accounting firm to audit its 1994 and 1995 financial statements in accordance with Federal requirements. However, not all CNS grant expenditures were covered by the audits because CNS funding continued through July 1996 (at least, according to the CNS' grant files). During the period January 1, 1996 through the time that fiscal responsibility was transferred from KCC to the YMCA of Greater Kansas City, KCC expended more than \$100 thousand dollars in support of the Bridges Across the Heartland program; therefore, the audit of its 1996 financial statements must be performed in accordance with Federal requirements.

OIG reviewed the 1994 and 1995 audit reports which reported no material weaknesses. We noted, however, that some conditions related to charges against the CNS grant were reported to KCC in the auditor's *Management Letter*. The management letter reports that KCC had charged the CNS grant on a fixed percentage basis because KCC had not developed a written cost allocation policy. The letter indicates that a cost allocation policy had been submitted to KCC's Board of Directors for approval.

We recommend that CNS grants management follow-up to determine whether KCC has appropriately implemented the cost allocation policy, applied it to all grant years, and re-evaluated charges to the grant throughout the period KCC operated the Bridges Across the Heartland Program.

Further, our review of the Myint and Buntua draft report and the accompanying workpapers indicates that, in addition to the conditions reported in the management letter, Myint and Buntua found that KCC —

¹ It is unclear exactly when KCC's fiscal responsibility ended. In reviewing CNS grant files we found an August 16, 1996 letter from CNS Grants Management staff that stated CNS' intent to amend the grant to transfer the "legal applicant of the subject grant from Kansas City Consensus to YMCA of Greater Kansas City" by August 31, 1995. Nevertheless, there appears to have been no formal amendment to the grant to transfer administrative responsibility until Amendment 5 which funds the program's third year and which was signed by CNS grant officials on September 27, 1996 and YMCA of Greater Kansas City on October 4, 1996. Amendment 4, executed in March 1996 and signed by CNS and KCC officials was merely an adjustment of funding to KCC for the second program year.

- made only limited efforts to verify *in-kind* matching contributions reported to it by the subgrantees; instead, the *in-kind* matching costs claimed were generally monitored by KCC only to ensure that they were “in-line” with the CNS grant budget;
- did not always require staff charged to the grant to maintain time reports which documented the projects they worked on. Most of their time was charged 100 percent to the grant; and
- did not account for, or report to CNS, the interest earned on Federal funds.

Consequently, we recommend that CNS grants management request that KCC and its auditors address the conditions reported herein, those in the management letter, and the information reported to CNS by KCC on its Financial Status Reports (FSRs) as part of KCC’s annual financial audit process.

In responding to the draft of this letter report, the Bridges Across the Heartland program director generally agreed that the draft accurately reported the conditions related to in-kind matching contributions, interest earned on Federal funds, and KCC’s cost allocations. The program director also pointed out that all staff are charged 100 percent to the grant.

Considering that most of these conditions appear to indicate non-compliance with Federal requirements, CNS regulations, and/or the grant provisions, OIG recommends that CNS Grants Management Office

- require that KCC and YMCA provide a copy of this letter report to the independent accounting firms performing the required OMB Circular A-133 audit;
- request that the firms determine and report to CNS and CNS OIG the amount of costs (and the related amounts of questioned costs) charged to the Federal government for these and other items they conclude violate Federal and CNS regulations and requirements; and

- close out the grant to KCC based on its independent auditor's reports and an analysis of grant expenditures and available funding using the program's FSRs.² OIG would be pleased to participate in this close out analysis and a review of KCC independent auditors' reports and their underlying work.

III. The Myint and Buntua review revealed that KCC paid living allowances during the program's first year of operations to 36 AmeriCorps members whose names were not listed on CNS-produced AmeriCorps Member rosters. Failure to include individuals enrolled in a program understates CNS' statistics for the number of AmeriCorps Members and Member attrition rates.

The workpapers and the Myint and Buntua draft report indicate that the program director agreed to provide the firm with copies of the enrollment forms for ten of the 36; however, we found no evidence that the information was provided to Myint and Buntua. Nor has OIG received the additional information. Accordingly, we have provided copies of the workpapers covering this condition to CNS for their follow-up.

We recommend that CNS, in addition to making whatever corrections are necessary to CNS' records, determine whether the discrepancy is an isolated error or results from a systemic problem. Moreover, although we are aware that CNS has begun to routinely distribute member rosters from the AmeriCorps database³ to its grantees, we recommend that CNS establish stronger procedures and controls to assure the reliability of data in the AmeriCorps database -- including but not limited to --

- distributing the rosters to both grantee *and subgrantee sites* for review and verification of the information, and

² As noted earlier in this letter report, the grant was renewed for a second year and funded at \$690 thousand. According to CNS grant files, the \$690 thousand originally included a carryover of approximately \$333 thousand from the first year's funding. However, in their December 1995 workpapers, Myint and Buntua calculated \$375,402 of unspent year one funds using KCC's Federal Financial Status Report data. Subsequently, under Amendment 4 to the grant, executed in March 1996, the grant amount for the second year remained at \$690 thousand, the amount of carry over funding was reduced by \$15 thousand -- offset by an increase in CNS current year funding.

³ The AmeriCorps database maintains information on AmeriCorps Members from the time of their initial enrollment in CNS-funded programs, completion of service, the amount of the service award earned, and payment of the earned awards.

- requiring periodic certification by grantees *and subgrantees* of the accuracy of the rosters, particularly near the end of, or after, the annual period of service when the grantees would know the education benefits the Members had earned.

We also recommend that these certifications be retained by CNS as part of its documentation of the National Service Trust Fund's internal controls.


If you or your staff have questions related to this report or wish to discuss these matters further, please contact me, William Anderson, Assistant Inspector General for Audit, or Douglas Hilton, Counsel to the IG.



Luise S. Jordan
Inspector General



Bridges Across the Heartland AmeriCorps

A program of the YMCA of Greater Kansas City 



3100 Broadway, Suite 930 • Kansas City, Missouri 64111 • Phone: (816) 561-9622 Fax: (816) 753-2903

December 16, 1996

Luise Jordan
Inspector General
Corporation for National Service
1201 New York Ave NW
Washington, D.C. 20525

Dear Ms. Jordan:

We have received your letter and draft report regarding the Myint and Buntua review of Kansas City Consensus. This letter is a response to the draft report issued to Terry Russell, Acting Executive Director.

The draft report cited several issues that are of concern to the Corporation for National Service. We will respond to each one individually.

High Member Attrition

The Kansas City Consensus program clearly had a high degree of AmeriCorps member attrition in the first two years of operation. We are in complete agreement with the report's findings and commentary as it relates to this issue.

We do have some concern regarding the attention the draft report gave to the efforts that have been made to address this issue. The draft report only says that we are aware of the problem and are working on it. This is accurate, but does not begin to emphasize the significant effort that has been put forth to resolve this problem.

In July, 1995, Shawn Corkrean was hired as the Director of the program. The 1994-95 program year was in its last month of operation. Member attrition was extremely high and many of the positions were simply never filled. The 1995-96 program was scheduled to begin in late August. We made a determination to not recruit "at-risk" members. We also had very little time to recruit quality members

Collaborating Agencies

Associated Youth Services • Big Brothers Big Sisters • Community Services League of Independence
Habitat for Humanity • Kansas City Community Gardens • Kansas City Public Library • Metropolitan Energy Center
Mid-Continent Council of Girl Scouts • Olathe District Schools • Operation Breakthrough • YMCA of Greater Kansas City
YWCA of Kansas City, Kansas • YWCA of Kansas City, Missouri

or make any other changes to the program. Thus we had many of the same problems, but to a lesser degree.

In the 1996-97 program year (at the YMCA), sweeping programmatic changes were made. We began by focusing on recruiting highly skilled members. This effort began in April, 1996, with the start date of September 1996 (see enclosures). We are aware of the challenges that a multi-site program presents. We believe that enrolling highly qualified members is big step towards addressing those challenges. We also created a sophisticated application process that would require our recruits to pass through in order to become a member (see enclosures). We also focused on several other efforts outlined in the enclosure title, "Narrative of Member Experience".

These measures are not guaranteed to work, but we believe they will have a very positive impact. As of December 16, 1996 (three and one half months into the program Year III) we have a 96% member retention rate.

Finally, we have had a very good working relationship with the Corporation regarding the issue of member retention. We have worked with our program officers Adin Miller and Marlene Zakai and very closely in correcting this problem. She has made several suggestions that we incorporated into our recruitment plan and our member orientation.

Verification of In-kind Matching Contributions

We have clearly not done an adequate job of verifying our in-kind matching contributions. We were not aware of the documentation requirements in this area. In the 1996-97 program year we have corrected this problem. We are implementing a new system that will require our operating sites to more closely verify their in-kind contributions (see enclosure).

Staff Time Sheets

All staff assigned to the AmeriCorps program spend 100% of their time on AmeriCorps activities. We do not document their specific activities on the time sheet for this reason. We are not aware that this is a violation of the grant. If we need to make change, please let us know.

Interest Earned on Federal Funds

We have mistakenly not reported interest earned on federal funds. This has been corrected. Interest earned from 1/1/96 to 10/31/96 was \$298.05.

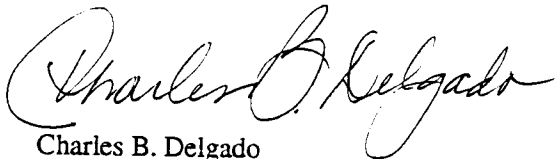
Cost Allocation Plan

The new parent organization, the YMCA of Greater Kansas City, has a very in-depth cost allocation plan that is currently in place. The "primitive" cost allocation plan that was in place at Kansas City Consensus did not accurately reflect the actual costs of the operation of the program. In reality, Kansas City Consensus ended up shouldering a much more significant share of the costs than for

which it was reimbursed. The costs reimbursed to Kansas City Consensus based on a fixed percentage did not financially benefit the organization. It caused them to overly subsidize the program.

The AmeriCorps program has moved to The YMCA of Greater Kansas City as of September 1, 1996. As Director of the program, Shawn Corkrean am now an employee of the YMCA. He has continued to take responsibility to clear up any further concern or questions resulting from the program operation in Year I and II. Please contact either of us regarding any further questions. Shawn can be reached at (816) 561-8122 ext. 244 or the Charles Delgado, Executive Director of Kansas City Consensus, at (816) 753-3398. We look forward to clearing these matters up. As the program operates at the YMCA, we would ask that you let us know of any areas where we are not meeting agreed upon requirements of the program. We have had a positive working relationship with the Corporation in the past and look forward to it continuing in the future.

Sincerely,




Charles B. Delgado
Executive Director
Kansas City Consensus



Shawn Corkrean
AmeriCorps Director
YMCA of Greater Kansas City



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Narrative of Member Experience

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- 1.) Pre-service workshop for operating sites.
- 2.) Extensive two week member orientation at beginning of service year
- 3.) Major effort to bring members into the Heartland Day planning and implementation efforts.
- 4.) Regular corps-wide monthly meetings and trainings.

As we go into Year III, we hope to build upon our experiences and make further improvements. In Year II, a major portion of our efforts was focused on improving the member experience through the efforts of the parent organization staff. We feel that that had a significant impact. As we move into Year III we plan to have the parent organization move from an instigator of improvement to a facilitator of improvement. In Year II, there were numerous issues that needed to be addressed immediately. Those issues were dealt with through direct parent organization staff action. We now feel that we have built up and improved our relationships with the operating sites. Now we can address more system-wide issues from a facilitator perspective.

We see a major need for improvement in the operating site supervision. The level of member satisfaction and member performance is highly correlated to the quality of supervision at the operating site level. In Year II, we realized that this was a problem, but had larger, more significant issues to correct. We are now at a point that we can address this area of the program. Here are several steps we plan to tackle this issue.

- 1.) Operating Site Staff Orientation. All operating site staff will be required to attend a one day workshop dealing with member management issues. In Year II, this session was devoted to explaining new fiscal policies and other new systems. This orientation will focus entirely on management and leadership tools and techniques.
- 2.) On Going Operating Site Staff Training. We plan to conduct bi-monthly staff training workshops for staff. This will be an opportunity for staff to gather and discuss issues relating to member supervision. We will have case studies from actual events. These trainings will be generated from topics that the operating sites choose.


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YWCA of Kansas City, Kansas ★ YWCA of Kansas City, Missouri

- 3.) Operating Site Handbook. All operating sites will be provided with a handbook from the Parent organization. This handbook will address the regulations set forth by the Corporation and by the parent organization. This handbook will not be a cure all. It will be a guide for the operating sites to refer to when they have questions regarding the operation of the program.
- 4.) Stricter Enforcement of Program Policy. The parent organization staff will enforce program policy. There were times when infractions of policies and rules were overlooked because an operating site had made significant improvements in other areas. We felt that to point out shortcomings in one area would serve as a poor reinforcement for significant improvements in another area. In Year III, all operating sites have been informed, and will be consistently reminded, that they are responsible for adhering to all policies and regulations.



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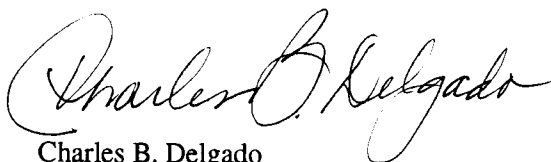
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YWCA of Kansas City, Kansas ★ YWCA of Kansas City, Missouri

- 3.) Operating Site Handbook. All operating sites will be provided with a handbook from the Parent organization. This handbook will address the regulations set forth by the Corporation and by the parent organization. This handbook will not be a cure all. It will be a guide for the operating sites to refer to when they have questions regarding the operation of the program.
- 4.) Stricter Enforcement of Program Policy. The parent organization staff will enforce program policy. There were times when infractions of policies and rules were overlooked because an operating site had made significant improvements in other areas. We felt that to point out shortcomings in one area would serve as a poor reinforcement for significant improvements in another area. In Year III, all operating sites have been informed, and will be consistently reminded, that they are responsible for adhering to all policies and regulations.