

Overview of Agency-wide Monitoring Planning Assessment Process Update for Fiscal Year 2008

We are pleased to share with you information about the Corporation's process for FY 2008 monitoring planning. As a federal agency, the Corporation is responsible for ensuring all federal resources are appropriately managed, which includes conducting monitoring visits to award recipients (e.g., grantees, cooperative agreement recipients, sponsors). The Corporation moved to a standardized system in Fiscal Year (FY) 2006 to help prioritize monitoring activities and more generally allocate Corporation resources for appropriate levels of monitoring, oversight, and technical assistance. We identified a standard set of criteria as indicators of potential program or financial vulnerability in the management of federal funds, and we conduct a yearly assessment of each Corporation award using the assessment criteria.

It is important to note that while the assessment tool generates priority levels for monitoring planning purposes, the designated levels are not indicators of a recipient's actual performance. Additionally, funding decisions or holds placed on award funds are made in accordance with Corporation policy and procedures and are not a direct result of the assessment process.

Below is some general information about the assessment process and how the Corporation uses the information.

What the monitoring planning assessment process is...

- A Corporation-wide internal resource management tool - a way to help prioritize monitoring activities, use of staff, and use of travel funds.
- A tool that generates priority levels (i.e., "high," "medium," and "low") for monitoring planning purposes.
- A standard set of criteria used by program officers and grants officers to help identify potential vulnerabilities in managing federal resources.
- A way to help identify potential training and technical assistance needs.
- An information source to help develop a comprehensive monitoring plan across all Corporation programs.
- Consistent with assessment processes used by many other federal grant-making agencies.

What the monitoring planning assessment process is not...

- A process to make judgments about a recipient's actual performance.
- Used to determine eligibility or award decisions or holds placed on award funds.

What does this mean to me as an award recipient?

- This information is being provided to you for your information only.
- You are not expected to do anything in response to this information.
- The assessment process will not add burden or new requirements for Corporation recipients, as this is a change to internal Corporation processes, not recipient processes.

What does this mean to the Corporation?

- Consistency across Corporation programs in how we prioritize monitoring activities and use monitoring resources (e.g., staff, travel funds).
- Greater coordination between the program and financial components of program administration.
- Prioritization of training and technical assistance resources.

What if I have any questions?

- Please contact your CNCS Program Officer if you have any questions regarding this process.



Document:

**CORPORATION-WIDE
MONITORING PLANNING ASSESSMENT
CRITERIA DESCRIPTIONS
MONITORING FY 2008**

Revision:

06/25/2007

Preface

The following elements pertain to this document as a whole and each of the criteria descriptions contained herein. These are no longer imbedded within each of the descriptions to foster simplicity and eliminate duplication.

Context

These criteria establish the Corporation-wide standards for determining monitoring priority levels based upon the defined criteria within the recognized assessment categories.

Control and Maintenance

Control and maintenance of this document will be in accordance with the procedures for maintaining all Corporation-wide assessment requirements. The Office of Award Oversight and Monitoring is responsible for updating and maintaining the criteria.

Table of Contents

Standard Criteria

<u>Criterion</u>	<u>Lead</u>	<u>Page</u>
New CNCS Recipient.....	Grants Officer	1
Change in Legal Applicant / Responsible Party.....	Grants Officer	2
Time Since Last Monitoring Visit.....	Program Officer (& Grants Officer).....	4
Staffing Changes	Program Officer	6
Overall Programmatic Progress.....	Program Officer	8
Multi-Site Program	Program Officer	10
Participant Enrollment and Retention	Program Officer	12
Innovative / Untested Program / Project Design	Program Officer	14
Major Changes in Project Design or Scope	Program Officer	16
Large Recipient and Multiple Awards	Grants Officer	18
Obligations and Expenditures	Grants Officer	20
Grantee Match	Grants Officer	23
Incomplete or Late Financial Status Reports	Grants Officer	25
Open Audit Findings	Grants Officer	27
Recipient Responsiveness.....	Program Officer (& Grants Officer).....	30
Incomplete or Late Progress Reports	Program Officer	32

Program-Specific Criteria

<u>Criterion</u>	<u>Lead</u>	<u>Page</u>
<i>OLDT Only:</i> One or More Partners or Subcontractors	Program Officer	34
<i>Appendix:</i> Glossary		35

Corporation-Wide Monitoring Planning Assessment Criterion: NEW CNCS RECIPIENT

Responsible Lead: Grants Officer	Assessment Category: Organizational	Revision: 06/25/2007
--	---	--------------------------------

1 Criterion Summary Statement

A “new CNCS recipient” is an organization that has not recently received a federal assistance activity (e.g., grant, cooperative agreement) directly from the Corporation. Recently is defined as the extent to which organizational data is available in eGrants for the past six years.

Previous experience as a CNCS recipient is acknowledged as a potentially useful indicator of lower vulnerability, as it may evidence some familiarity with Corporation program operation, fiscal management, oversight, and reporting practices. Experience as only a VISTA sponsor is not considered in new recipient determinations since sponsorship agreements do not involve management of federal funds on the part of the recipient.

2 Terms and Definitions	Terminology unique to this criterion are:
--------------------------------	---

New CNCS Recipient: An organization that has not directly received a grant from the Corporation within the last six years (to the extent organizational history is available in eGrants) and is in its first year of its grant from the Corporation. (Continuation/renewal years do not constitute a new CNCS recipient under this criterion.)

3 User Instructions	A “Yes” or “No” response is required for this criterion. A “Yes” response is an indication that the factor is present.
----------------------------	--

“ <u>Yes</u> ” response – required when any one of these factors are met:	Other than the grant currently in place, the recipient/sponsor has not recently had a direct grant from the Corporation.
--	--

“ <u>No</u> ” response – required when:	None of the factors described above are met.
--	--

[“ <i>N/A</i> ” response]	[<i>Not a selection option for this criterion.</i>]
---------------------------	---

4 Examples	Responses to this criterion are appropriate in instances such as:
-------------------	---

A “ <u>Yes</u> ” response:	In July, the grantee is in its first year of its first grant/sponsorship agreement with the Corporation.
-----------------------------------	--

5 Source Documentation (Where to Look)	The source documentation which supports the determination of “ <u>Yes</u> ” for this criterion are:
---	--

eGrants query results (e.g., organizational history).

6 Required Comments	Comments are required in the assessment record as follows:
----------------------------	--

“ <u>Yes</u> ” determination:	[<i>Not required</i>]
--------------------------------------	-------------------------

“ <u>No</u> ” determination:	[<i>Not required</i>]
-------------------------------------	-------------------------

Corporation-Wide Monitoring Planning Assessment Criterion: CHANGE IN LEGAL APPLICANT / RESPONSIBLE PARTY
--

Responsible Lead: Grants Officer	Assessment Category: Organizational	Revision: 06/25/2007
--	---	--------------------------------

1 Criterion Summary Statement

Vulnerability is associated with a recent change in the legal applicant or the fiscal agent responsible for the grant/funded program.

Changes in the legal entity responsible for the programmatic and/or fiscal management of CNCS funded programs is a potential vulnerability because it could lead to a gap in required grant responsibilities. As such, changes in the legal entity which occur in the midst of a current award period must be identified. This criterion is based upon post-award change among the entities specified in the award.

2 Terms and Definitions	Terminology unique to this criterion are:
--------------------------------	---

Legal Applicant: The organization that is legally responsible for the programmatic and/or fiscal management of CNCS funded programs.

Fiscal Agent: The organization or agency that is responsible for the fiscal management of a CNCS funded program, but is not necessarily responsible for the programmatic management of the same program. For instance, this applies to State Commissions when a state agency is responsible for the management of their funds while the Commission is responsible for the programmatic management of their subgrantees.

3 User Instructions	A “Yes” or “No” response is required for this criterion. A “Yes” response is an indication that the factor is present.
----------------------------	--

“Yes” response – required when any one of these factors are met:	<ul style="list-style-type: none"> (a) The legal applicant changed. (b) The fiscal agent changed or is in the process of changing (e.g, notice given to the Corporation, application for change being processed). (c) For Senior Corps, this criterion applies only when the grant is being managed by an interim sponsor at the time of assessment.
“No” response – required when:	None of the factors described above are met.
[“N/A” response]	[Not a selection option for this criterion.]

4 Examples	Responses to this criterion are appropriate in instances such as:
A “Yes” response:	<ul style="list-style-type: none"> (a) The legal applicant responsible for the grant changed from one non-profit to another non-profit during the post-award grant period. (b) A State Commission is relocated to a different state agency or converts to a separate 501(c)3 non-profit status. (c) The legal applicant, a well-known foundation that initially agreed to be the legal applicant for a consortium of non-profits, decides that the reporting burden for a Learn and Serve America (LSA) grant is too high and asks to be removed as the legal applicant. There is a letter from one of the partners asking to be the new legal applicant, yet the consortia partners were not vetted in GARP for their capacity to manage the grant and there is no documentation as to the capacity and experience of the proposed legal applicant. (d) A Senior Corps grantee relinquished the grant and an interim sponsor is currently administering the grant until a permanent sponsor is in place.
5 Source Documentation (Where to Look)	The source documentation which supports the determination of “Yes” for this criterion are:
	<p>Notification from the recipient that the legal applicant or fiscal agent has changed or is changing.</p> <p>Outcomes from compliance visits.</p> <p>A grant award that implemented a legal applicant / responsible party change.</p>
6 Required Comments	Comments are required in the assessment record as follows:
“Yes” determination:	Briefly indicate when the change occurred (or that the change is in the process of occurring) and provide the names of the former and new legal applicants.
“No” determination:	<i>[Not required]</i>

Corporation-Wide Monitoring Planning Assessment Criterion: TIME SINCE LAST MONITORING VISIT

Responsible Lead: Program Officer [Grants Officer]	Assessment Category: Organizational	Revision: 06/25/2007
--	---	--------------------------------

Special Criterion Instruction

For this criterion, the Grants Officer also provides relevant information that contributes to a “Yes” determination as defined below. The Grants Officer provides this documentation by entering applicable information in the criterion “Comments” field of the assessment record prior to completing the GO Submission for the assessment record. The Program Officer then reviews that information in making the final determination for this criterion, being certain to account for information that contributes to a “Yes” determination.

1 Criterion Summary Statement

This criterion considers the amount of time that has passed since CNCS conducted an on-site monitoring visit (either program or financial) for this award. For the purposes of this criterion, on-site monitoring visit includes any form of on-site compliance, targeted, or training/technical assistance visits and does not include on-site opportunity visits. Since potential vulnerabilities can increase as time between visits lengthens, it is necessary to consider this element in the overall priority level, especially if other factors are also present.

We recognize that grant numbers for the same recipient/sponsor under the same funding stream change every two or three years. Therefore, when determining the time lapse since the last visit, consider the recipient/sponsor and the funding stream as opposed to just the actual grant number itself. If the recipient/sponsor and the funding stream remain the same and the change is that of the cyclical grant number update (e.g., a Senior Corps grantee that has received RSVP project funding from CNCS for the past 10 years), then assess this criterion based on when CNCS conducted the last on-site monitoring visit for this recipient/sponsor and funding stream. (This criterion is a potential factor only when recipients have received funds from CNCS under the same funding stream for five or more years.)

2 Terms and Definitions	Terminology unique to this criterion are:
--------------------------------	---

[None]

3 User Instructions	A “Yes” or “No” response is required for this criterion. A “Yes” response is an indication that the factor is present.
----------------------------	--

“Yes” response – required when any one of these factors are met:	<ul style="list-style-type: none"> (a) It has been more than five years (60 months) since a CNCS staff person conducted an on-site monitoring visit for this recipient/sponsor under this funding stream. (This excludes opportunity visits.) (b) Based on a check in the specified source documentation (below), the date of the last monitoring visit is unavailable or unknown.
---	--

“No” response – required when:	None of the factors described above are met.
---------------------------------------	--

“N/A” response	<i>[Not a selection option for this criterion.]</i>
-----------------------	---

4 Examples	Responses to this criterion are appropriate in instances such as:
A “Yes” response:	<ul style="list-style-type: none"> (a) It is July 2007 and the last on-site monitoring visit was conducted in October 2001. (b) After checking the documentation sources, the date of the last monitoring visit could not be verified.
5 Source Documentation (Where to Look)	The source documentation which supports the determination of “Yes” for this criterion are:
	<p>eGrants Monitoring Module.</p> <p>Electronic/hard copy documentation (e.g., VISTA monitoring activities schedule/standardized spreadsheet).</p>
6 Required Comments	Comments are required in the assessment record as follows:
“Yes” determination:	<i>[Not required]</i>
“No” determination:	Briefly indicate the month and year of the last on-site monitoring activity and reference the information source (e.g., eGrants; office spreadsheet). <i>Note:</i> For FY 2005 and forward (e.g., 2006, 2007), if the visit was done but not documented in eGrants, the appropriate documentation must be entered into the eGrants Monitoring Module.

Corporation-Wide Monitoring Planning Assessment Criterion: STAFFING CHANGES

Responsible Lead: Program Officer	Assessment Category: Organizational	Revision: 06/25/2007
---	---	--------------------------------

1 Criterion Summary Statement

Vulnerabilities are associated with recent changes in key staff responsible for operating the CNCS funded grant or project, and with key staff positions which are left unfilled or exhibit a pattern of frequent turnover during the assessment period. Changes in key staff and unfilled key staff positions are factors due to the need to ensure the transfer of grant-specific knowledge and operational requirements between individuals.

“Staffing” refers specifically to key staff who are directly associated with the operation of CNCS funded programs, the supervision of a VISTA, or the state commission board. It is assumed that the adequacy of staff in relation to their ability to operate the program, both in number and appropriate background, was determined to be adequate and appropriate when the program was initiated and funded. This criterion is based upon post-award change and considers staff changes within the last 6 months, a pattern of staff changes within the last 12 months, long-standing vacant key staff positions, or non-compliance with state commission board composition requirements.

2 Terms and Definitions	Terminology unique to this criterion are:
--------------------------------	---

Key Staff: Staff directly responsible for the programmatic or fiscal operation and/or management of the grant or project. For VISTA, “Key Staff” also refers to staff who supervise a VISTA.

Recent Change: A change in staff within the last six (6) months.

3 User Instructions	A “Yes” or “No” response is required for this criterion. A “Yes” response is an indication that the factor is present.
----------------------------	--

<p>“Yes” response – required when any one of these factors are met:</p>	<ul style="list-style-type: none"> (a) One or more changes in key staff within the last 6 months or a pattern of changes within the last 12 months. (b) One or more key staff positions left unfilled, with or without attempt to refill the position. (c) Non-compliance with state commission board composition requirements.
<p>“No” response – required when:</p>	<p>None of the factors described above are met.</p>
<p>[“<i>N/A</i>” response]</p>	<p>[<i>Not a selection option for this criterion.</i>]</p>

4 Examples	Responses to this criterion are appropriate in instances such as:
A “Yes” response:	<ul style="list-style-type: none"> (a) The Program Director, who is responsible for programmatic oversight of the grant, leaves his/her position and no attempt is made to refill the position. (b) A VISTA project experiences frequent turnover of the VISTA Supervisor or does not attempt to replace a VISTA Supervisor who has vacated the position. (c) A state commission board is not compliant with the regulatory requirements for board composition.
5 Source Documentation (Where to Look)	The source documentation which supports the determination of “Yes” for this criterion are:
	<p>Outcomes from compliance visits.</p> <p>Routine correspondence with the grantee.</p> <p>Grantee budget changes which reduce staffing levels or eliminate key staff positions.</p>
6 Required Comments	Comments are required in the assessment record as follows:
“Yes” determination:	Briefly indicate the type of staff change and when the change occurred.
“No” determination:	<i>[Not required]</i>

Corporation-Wide Monitoring Planning Assessment Criterion: OVERALL PROGRAMMATIC PROGRESS
--

Responsible Lead: Program Officer	Assessment Category: Program	Revision: 06/25/2007
---	--	--------------------------------

1 Criterion Summary Statement

This criterion focuses on the overall progress of the project, including progress against the established performance measures, and relies on information obtained from recipient/grantee program progress reports and/or key documentation regarding project performance. Designating a recipient as having low quality and/or inadequate progress should be based upon an aggregate, general assessment of performance as reported in the program progress report or as communicated with the grantee in key correspondence.

We recognize that grant numbers for the same recipient/sponsor under the same funding stream change every two or three years. Therefore, when determining overall programmatic progress, consider the recipient/sponsor and the funding stream as opposed to just the actual grant number itself. If the recipient/sponsor and the funding stream remain the same and the change is that of the cyclical grant number update (e.g., a Senior Corps grantee that has received RSVP project funding from CNCS for the past 10 years), then assess this criterion based on when the last progress report was submitted for this recipient/sponsor and funding stream.

Note: A late or incomplete program progress report is *not* an indicator of potential vulnerability under this criterion; late and/or incomplete program progress reports are addressed under a separate criterion.

2 Terms and Definitions	Terminology unique to this criterion are:
--------------------------------	---

[None]

3 User Instructions	A “Yes” or “No” response is required for this criterion. A “Yes” response is an indication that the factor is present.
----------------------------	--

“Yes” response – required when any one of these factors are met:

- (a) The program officer believes that, when reviewed aggregately, the grantee has not either *made or reported* reasonable progress during the preceding performance period. In determining reasonable progress, the Program Officer assesses performance in the program progress report. The determination of what constitutes reasonable, quality progress must be determined on a per-program basis and applied evenly to all grantees under that program or fiscal operation and/or management of the grant or project.
- (b) In the program progress report, a recipient self-identifies its program as making inadequate progress or having results that are below acceptable quality.
- (c) Since the last program progress report submission, the Program Officer believes the grantee is no longer making reasonable progress and has documented the change in progress in key correspondence with the grantee.

“No” response – required when:

None of the factors described above are met.

[“N/A” response]

[Not a selection option for this criterion.]

4 Examples	Responses to this criterion are appropriate in instances such as:
A “ Yes ” response:	<ul style="list-style-type: none"> (a) A Learn and Serve grantee reporting for the period ending its first year of operation reports any one or more of the following: 1) subgrants have not yet been made; 2) a search is underway for a new community partner because the partner written into the grant application is unable to fulfill the agreed upon requirements; 3) no monitoring of subgrantees has been reported; 4) activities reported on are not related to the purpose of the grant application; or, 5) narrative responses are vague and do not provide clear documentation of progress to date in any of the above narrative areas. (b) A State Commission reports via their Administrative Funds application that it has not been successful in meeting the goals listed in its State Service Plan. (c) An AmeriCorps National Direct grantee’s progress report does not include information regarding their site monitoring activities during the reporting period. (d) A new grant award was awarded for a new project and the first program progress report is not yet due or submitted. However, there is already documentation and concern about the recipient’s progress.
5 Source Documentation (Where to Look)	The source documentation which supports the determination of “ Yes ” for this criterion are:
<p>A review or assessment of the most recent submission of the Program Progress Report.</p> <p>Key documentation indicating a change in overall progress since the last program progress report submission or, in the case of a new award, the grant was awarded.</p>	
6 Required Comments	Comments are required in the assessment record as follows:
“ Yes ” determination:	Required <i>only</i> if the “yes” determination does not relate directly back to the last program progress report submission. (When it relates back to the last progress report submission, it is implicit that it is attributable to the last progress report and supporting feedback.) If the “yes” determination is based on subsequent key documentation, comments must briefly indicate the nature of concern and identify the documentation source.
“ No ” determination:	[Not required]

Corporation-Wide Monitoring Planning Assessment Criterion: MULTI-SITE PROGRAM

Responsible Lead: Program Officer	Assessment Category: Program	Revision: 06/25/2007
---	--	--------------------------------

1 Criterion Summary Statement

This criterion applies to programs that function as intermediary organizations or other component projects that are responsible for managing / allocating resources to multiple operating sites, subgrantees, or subrecipients. Vulnerability is associated with a high number of operating sites.

2 Terms and Definitions	Terminology unique to this criterion are:
--------------------------------	---

Intermediary Organization: An organization that serves as a direct recipient of Corporation resources and then subgrants or suballocates those resources into the community. Examples: A State Commission acts as an intermediary organization that allocates CNCS funds to subgrantees within the state. An AmeriCorps*Direct grantee acts as an intermediary organization that subgrants CNCS funds to operating sites in two or more states.

Operating Site: A local organization that implements grant activities at a local level.

Subrecipient / Subgrantee: An organization that receives CNCS grant funds from a CNCS grantee and not directly from the Corporation. (Similarly, a sub-subgrantee receives grant funds from a CNCS subgrantee.)

Component Project (Senior Corps only): A decentralized local project that operates with a main office and one or more satellite or “component” offices funded by Corporation or non-Corporation sources. To qualify, the project’s component office(s) is staffed by a coordinator or coordinators with management oversight responsibility for at least 10 Volunteer Service Years (VSYs) or 50 budgeted RSVP volunteers. Component projects generally do not have their own grant numbers in eGrants; rather, components are attached to the primary grant number.

3 User Instructions	A “Yes,” “No” or “N/A” response is required for this criterion. A “Yes” response is an indication that the factor is present.
----------------------------	---

“**Yes**” response – required when any one of these factors are met:

A prime grantee/sponsor is responsible for the management of a large number of operating / subrecipient sites. Program-specific criteria for what constitutes a “large” number is as follows:

- AmeriCorps*National: 20 or more sites
- AmeriCorps*VISTA: 8 or more sites
- Senior Corps: 5 or more project component sites
- Special Initiatives: sites in 2 or more states *or* 2 or more distinct jurisdictions within a single state
- Learn and Serve America: Higher Education Consortia, Indian Tribes or U.S. Territories with 2 or more sites; school and community-based grantees that sub-grant

“**No**” response – required when:

None of the factors described above are met.

<p>“<u>N/A</u>” response – required when:</p>	<p>(a) The grant is awarded to one of the following (certain programs (identified below) are automatically considered multi-site by the nature of the program (i.e., awards made to agencies who in turn automatically fund multiple subgrants)):</p> <ul style="list-style-type: none"> • <u>AmeriCorps*State</u>: State Commission • <u>Learn and Serve America</u>: State Education Agency; State Commission; Grantmaking Entities that do not sub-subgrant <p>(b) The grant is an <u>OLDT</u> T/TA cooperative agreement. (While these projects support multiple CNCS recipients through an array of methods, these are not multi-site in the context of this criterion.)</p>
4 Examples	Responses to this criterion are appropriate in instances such as:
<p>A “<u>Yes</u>” response:</p>	<p>(a) An intermediary organization subgrants resources to a number of organizations that exceeds the program specific threshold.</p> <p>(b) A large project partners with other organizations who serve as operating sites of the overall project. (This does not necessarily refer to a project that merely places members or volunteers with other organizations.)</p> <p>(c) A statewide Foster Grandparent project receiving Corporation funds operates from its central office in the middle of the state and establishes five satellite offices to manage separate geographic regions, each with its own coordinator, files, and volunteers. Each satellite office is a “component” of the project.</p> <p>(d) A large State Education Agency subgrants its School-Based Formula funds to regional educational centers that provide sub-subgrants, training, and technical assistance to schools within a particular geographic area.</p>
5 Source Documentation (Where to Look)	The source documentation which supports the determination of “ <u>Yes</u> ” for this criterion are:
<p>Grant Application / Project File.</p> <p>Notice of Grant Award / Memorandum of Agreement.</p>	
6 Required Comments	Comments are required in the assessment record as follows:
<p>“<u>Yes</u>” determination:</p>	<p><i>[Not required]</i></p>
<p>“<u>No</u>” determination:</p>	<p><i>[Not required]</i></p>
<p>“<u>N/A</u>” determination:</p>	<p><i>[Not required]</i></p>

Corporation-Wide Monitoring Planning Assessment Criterion: PARTICIPANT ENROLLMENT AND RETENTION

Responsible Lead: Program Officer	Assessment Category: Program	Revision: 06/25/2007
---	--	--------------------------------

1 Criterion Summary Statement

This criterion is designed to recognize vulnerability associated with grantees that do not enroll or do not retain participants at the level identified in the project goals of the grant award. (This includes intermediary organizations (e.g., State Commissions) who oversee the enrollment/retention activities of subrecipients.) These are typically categorized as member enrollment, Volunteer Service Years (VSYs), Member Service Years (MSYs), or some other measure of participant on-board strength. This does not include community volunteers who are mobilized by participants.

2 Terms and Definitions	Terminology unique to this criterion are:
--------------------------------	---

Participant Enrollment: Refers to the enrollment of participants in a CNCS funded grant program. This does not include community volunteers who are mobilized by participants.

Participant Retention: Refers to the ability of a CNCS funded grant program to retain the participants that it enrolls.

Volunteer Service Year (VSY): Budgeting unit of measure used by CNCS programs (e.g., for the Senior Corps’ Foster Grandparent and Senior Companion Programs, one VSY equals 1,044 hours).

Member Service Year (MSY): Budgeting unit of measure used by CNCS programs (i.e., AmeriCorps*State/National, AmeriCorps*VISTA).

3 User Instructions	A “Yes,” “No” or “N/A” response is required for this criterion. A “Yes” response is an indication that the factor is present.
----------------------------	---

“Yes” response – required when any one of these factors are met:	<ul style="list-style-type: none"> (a) After one year of project operations, the recipient/sponsor is failing to meet at least 50% of its participant enrollment or retention levels proposed in its application. (b) After two years or more of project operations, the recipient/sponsor is failing to cumulatively meet at least 75% of its participant enrollment or retention levels proposed in its application. (c) A demonstrated high level of turnover, as determined by the Program Officer. (d) The recipient is failing to meet thresholds established through Corporation program policies (e.g., Senior Corps <i>Policy 850: Maintenance and Management of Foster Grandparent Program and Senior Companion Program Volunteer Service Years</i>).
---	---

“No” response – required when:	None of the factors described above are met.
---------------------------------------	--

“N/A” response – required when:	The grant does not require the formal enrollment and tracking of National Service participants or members (such as programs with a primary objective of recruiting community volunteers).
--	---

4 Examples	Responses to this criterion are appropriate in instances such as:
A “Yes” response:	<p>(a) The recipient filled only 45% of its participant level after one year of project operations.</p> <p>(b) The recipient’s final year application reflects that the recipient is failing to meet at least 75% of its national service level proposed in the original application.</p>
5 Source Documentation (Where to Look)	The source documentation which supports the determination of “Yes” for this criterion are:
	<p>Program Progress Report.</p> <p>SPAN.</p> <p>Correspondence with the recipient/sponsor confirming the problem exists.</p>
6 Required Comments	Comments are required in the assessment record as follows:
“Yes” determination:	Indicate the factor(s) the recipient has met.
“No” determination:	<i>[Not required]</i>
“N/A” determination:	<i>[Not required]</i>

Corporation-Wide Monitoring Planning Assessment Criterion: INNOVATIVE / UNTESTED PROGRAM / PROJECT DESIGN

Responsible Lead: Program Officer	Assessment Category: Program	Revision: 06/25/2007
---	--	--------------------------------

1 Criterion Summary Statement

This criterion applies to a program that possesses an innovative and untested design and/or is carried out by a new or non-typical partnership of organizations without a track record of successful collaboration.

Despite the most careful proposal solicitation, review, and award, the presence of certain program characteristics, while not necessarily predicting program failure, are acknowledged as making success more difficult to achieve compared to programs that lack these characteristics. Yet an important role for the Corporation is to ensure that its overall program effort includes potentially high-reward/high-risk program strategies – possibly best characterized as the “innovative, high-risk” component of the Corporation’s portfolio.

2 Terms and Definitions	Terminology unique to this criterion are:
--------------------------------	---

Innovative / Untested Program Design: A strategy or service activity for which there is no relevant experience that would predict success.

New / Non-Typical Partnership: A partnership, critical to the success of the program, which comprises organizations with little or no experience with operational collaboration or is atypical in nature.

3 User Instructions	A “Yes,” “No” or “N/A” response is required for this criterion. A “Yes” response is an indication that the factor is present.
----------------------------	---

<u>“Yes”</u> response – required when any one of these factors are met:	(a) The program is based on an innovative or untested program design. (b) The program has in place a new or non-typical partnership.
<u>“No”</u> response – required when:	None of the factors described above are met.
<u>“N/A”</u> response – required when:	The project is an OLDT T/TA cooperative agreement. The very nature of these projects is to be innovative. Any concerns or potential vulnerabilities are identified through other assessment criteria.

4 Examples	Responses to this criterion are appropriate in instances such as:
A <u>Yes</u> response:	<ul style="list-style-type: none"> (a) A CNCS recipient/sponsor proposed a new partnership among community and faith-based organizations that had little or no experience collaborating within the community. (b) A CNCS recipient/sponsor proposed to carry out an as-yet untested service activity. (c) Learn and Serve America: In response to a Learn and Serve priority to fund demonstration programs that collaborate with Department of Education Safe School grantees, an applicant proposes to implement a service-learning program in two school districts that are recipients of large/complex Education grants. It is an unknown whether or not the two grants will compete for scarce staff and administration time/resources or compliment each other, resulting in a seamless program delivery.
5 Source Documentation (Where to Look)	The source documentation which supports the determination of <u>Yes</u> for this criterion are:
The proposal narrative and documentation of the proposal review comprise the primary information to support a determination.	
6 Required Comments	Comments are required in the assessment record as follows:
<u>Yes</u> determination:	Briefly identify the circumstance supporting the determination.
<u>No</u> determination:	<i>[Not required]</i>
<u>N/A</u> determination:	<i>[Not required]</i>

Corporation-Wide Monitoring Planning Assessment Criterion: MAJOR CHANGES IN PROJECT DESIGN OR SCOPE

Responsible Lead: Program Officer	Assessment Category: Program	Revision: 06/25/2007
---	--	--------------------------------

1 Criterion Summary Statement

Potential vulnerability is associated with changes in key elements of the project, as identified in the initial design (work plan) of the CNCS funded program. Such changes would include major additions/decreases or major changes in the types of: (1) participants, partners, or target beneficiaries; (2) service areas; or, (3) project scope, both geographic and programmatic.

This criterion is based exclusively upon post-award change. It is assumed that the project design was determined to be adequate and appropriate when the project was initiated and funded. Potential vulnerabilities would be associated with the above changes only if the changes are proposed or originated by the project or recipient. If the Corporation proposes the change or addition/decrease, it is assumed the Corporation has evaluated the program’s capacity to make the change effectively and the assessment would not be affected.

2 Terms and Definitions	Terminology unique to this criterion are:
--------------------------------	---

“**Major**” refers to increases, decreases, or changes in the above elements that raise questions about the organization’s ability or capacity to achieve its stated performance measures.

3 User Instructions	A “Yes” or “No” response is required for this criterion. A “Yes” response is an indication that the factor is present.
----------------------------	--

<p>“Yes” response – required when any one of these factors are met:</p>	<p>(a) There is a major increase, decrease, or change in type for any of the following:</p> <ul style="list-style-type: none"> • Participants, including program/project members or volunteers, but <u>not</u> counting community volunteers leveraged. • Program/project partners. • Program/project target beneficiaries. • Program/project service areas. <p>(b) For OLDT T/TA Providers only – there is a major T/TA work plan change proposed by the provider due to one or both of the following:</p> <ul style="list-style-type: none"> • Inadequate capacity by provider in terms of knowledge, skill, or expertise. • Inadequate planning by provider.
--	---

<p>“No” response – required when:</p>	<p>None of the factors described above are met.</p>
--	---

<p>[“<i>N/A</i>” response]</p>	<p>[<i>Not a selection option for this criterion.</i>]</p>
--------------------------------	--

4 Examples	Responses to this criterion are appropriate in instances such as:
A “Yes” response:	<ul style="list-style-type: none"> (a) The organization doubled its program/project members. (b) The organization took on a new partner. (c) The organization eliminated a group as target beneficiaries. (d) The organization reduced its activities in a given service area by 50%. (e) The organization opened a new service area. (f) The organization added new subgrantee sites.
5 Source Documentation (Where to Look)	The source documentation which supports the determination of “Yes” for this criterion are:
	<p>Program Progress Reports.</p> <p>Outcomes from monitoring visits or meetings.</p> <p>Requests for amendments to the grant/award.</p> <p>Routine correspondence or communications with the recipient.</p>
6 Required Comments	Comments are required in the assessment record as follows:
“Yes” determination:	<p>Briefly indicate:</p> <ul style="list-style-type: none"> • The type of increase, decrease, change, or activity that led to the conclusion; • The documentation, if any, that supports the conclusion, and where that documentation is found.
“No” determination:	<i>[Not required]</i>

Corporation-Wide Monitoring Planning Assessment Criterion: LARGE RECIPIENT AND MULTIPLE AWARDS
--

Responsible Lead: Grants Officer	Assessment Category: Financial	Revision: 06/25/2007
--	--	--------------------------------

1 Criterion Summary Statement

This criterion is designed to recognize when a grantee has received large amounts of federal grant funds or multiple awards from the Corporation. These circumstances lead to an inherent vulnerability associated with safeguarding large sums of federal dollars or federal dollars awarded through multiple grant awards. This criterion also recognizes when a grantee receives a large number of participant positions in their award.

2 Terms and Definitions	Terminology unique to this criterion are:
--------------------------------	---

Participant Position: The number of positions that support/fill the Volunteer Service Year (VSY – e.g., Senior Corps’ Foster Grandparent and Senior Companion Programs) or Member Service Year (MSY – i.e., AmeriCorps*State/National, AmeriCorps*VISTA) allotment of a grant award.

3 User Instructions	A “Yes” or “No” response is required for this criterion. A “Yes” response is an indication that the factor is present.
----------------------------	--

<p>“Yes” response – required when any one of these factors are met:</p>	<p>(a) The <i>annual</i> award amount for a grant award equals or exceeds the dollar threshold specified below: <i>(Note: For two- or three-year grants awarded up-front, annualize the year-by-year amount to determine the proper amount for comparison against the thresholds below.)</i></p> <table style="width: 100%; border: none;"> <tr><td>• AmeriCorps*State</td><td style="text-align: right;">\$ 3,000,000 annually</td></tr> <tr><td>• AmeriCorps*National</td><td style="text-align: right;">\$ 1,000,000 annually</td></tr> <tr><td>• Foster Grandparent</td><td style="text-align: right;">\$ 355,000 annually</td></tr> <tr><td>• Senior Companion Programs</td><td style="text-align: right;">\$ 310,000 annually</td></tr> <tr><td>• RSVP (Retired & Senior Volunteer Program)</td><td style="text-align: right;">\$ 94,000 annually</td></tr> <tr><td>• AmeriCorps*VISTA Program Grant</td><td style="text-align: right;">\$ 500,000 annually</td></tr> <tr><td>• Learn and Serve America</td><td style="text-align: right;">\$ 500,000 annually</td></tr> <tr><td>• OLDT T/TA Cooperative Agreements</td><td style="text-align: right;">\$ 1,000,000 annually</td></tr> <tr><td>• All Other Programs</td><td style="text-align: right;">\$ 500,000 annually</td></tr> </table> <p>(b) The recipient has a total of two or more active awards from the Corporation. (Exception: AmeriCorps*State grants to State Commissions are not applicable to this one factor – multiple awards – since all receive multiple CNCS awards.)</p> <p>(c) The recipient has a total of 500 or more participant positions in their award.</p> <p>(d) A VISTA standard project has 10 or more members and/or has a Support Grant of more than \$45,000.</p>	• AmeriCorps*State	\$ 3,000,000 annually	• AmeriCorps*National	\$ 1,000,000 annually	• Foster Grandparent	\$ 355,000 annually	• Senior Companion Programs	\$ 310,000 annually	• RSVP (Retired & Senior Volunteer Program)	\$ 94,000 annually	• AmeriCorps*VISTA Program Grant	\$ 500,000 annually	• Learn and Serve America	\$ 500,000 annually	• OLDT T/TA Cooperative Agreements	\$ 1,000,000 annually	• All Other Programs	\$ 500,000 annually
• AmeriCorps*State	\$ 3,000,000 annually																		
• AmeriCorps*National	\$ 1,000,000 annually																		
• Foster Grandparent	\$ 355,000 annually																		
• Senior Companion Programs	\$ 310,000 annually																		
• RSVP (Retired & Senior Volunteer Program)	\$ 94,000 annually																		
• AmeriCorps*VISTA Program Grant	\$ 500,000 annually																		
• Learn and Serve America	\$ 500,000 annually																		
• OLDT T/TA Cooperative Agreements	\$ 1,000,000 annually																		
• All Other Programs	\$ 500,000 annually																		
<p>“No” response – required when:</p>	<p>None of the factors described above are met.</p>																		
<p>[“<i>N/A</i>” response]</p>	<p>[<i>Not a selection option for this criterion.</i>]</p>																		

Corporation for National and Community Service	Page: 19
Corporation-Wide Monitoring Planning Assessment Criterion: LARGE RECIPIENT AND MULTIPLE AWARDS	Revision: 06/25/2007

4 Examples	Responses to this criterion are appropriate in instances such as:
A “ Yes ” response:	<ul style="list-style-type: none"> (a) An AmeriCorps*State Commission grant was more than \$3 million within the last 12 months. (b) An AmeriCorps*Education Award grant includes 200 Member Service Years (MSYs) which represents over 800 member positions. (c) An organization sponsors both a Foster Grandparent Program (\$280,000) and RSVP program (\$45,000). (d) An organization has an AmeriCorps*VISTA project (\$30,000 S&T grant), an AmeriCorps*National award (\$200,000), and a Special Volunteer Program (\$500,000).
5 Source Documentation (Where to Look)	The source documentation which supports the determination of “ Yes ” for this criterion are:
	<p>Current budget(s).</p> <p>Most recent Notice of Grant Award (NGA) / current award(s).</p> <p>eGrants query results (e.g., organizational history; Grants Officer Certification Screen).</p>
6 Required Comments	Comments are required in the assessment record as follows:
“ Yes ” determination:	Briefly indicate the factor(s) the recipient has met.
“ No ” determination:	<i>[Not required]</i>

Corporation-Wide Monitoring Planning Assessment Criterion: OBLIGATIONS AND EXPENDITURES

Responsible Lead: Grants Officer	Assessment Category: Financial	Revision: 06/25/2007
--	--	--------------------------------

1 Criterion Summary Statement

This criterion is designed to recognize when a recipient has received federal award assistance but is not using the funds or other assistance provided on a schedule that would typically be necessary and associated with successful performance. This includes spending patterns that indicate unusually high rates of spending. Without timely, regular, and systematic use of the award funds, the likelihood that there is a problem with the recipient’s ability to operate the program is higher (e.g., failing to hire staff or to issue subgrants) than when a recipient is obligating and expending award funds on a consistent and regular schedule.

2 Terms and Definitions	Terminology unique to this criterion are:
--------------------------------	---

Obligations / Obligate Funds: After an award is made, federal assistance under that award is obligated when the grantee/sponsor establishes a legally binding agreement to pay for goods or services from which there is a penalty for failing to honor the agreement. The amount obligated is reported to the grants office, typically on semi-annual cycles, but may be reported annually or quarterly. Obligations are typically established by employee payroll time and attendance systems, contracts, agreements, and purchase orders issued by the grantee.

Expenditures / Expend Funds: Grant funds are obligated once a grantee/sponsor has established a legally binding agreement for the use of grant funds. As goods and services are received and accepted by the grantee/sponsor for the obligations made, grant funds are *expended* as the bills and invoices are paid for those obligations.

Drawdown Funds: The process a grantee/sponsor uses to request and receive grant funds into their account from the U.S. Treasury. The grants office monitors the current amount drawdown by accessing the HHS Payment Management System. Typically, funds are drawdown electronically and should be drawdown only when needed to pay bills, invoices, and payroll expenses.

3 User Instruction Notes	Additional information to support the User Instructions below is as follows (specific reference numbers are included in the instructions as superscripts):
---------------------------------	--

- 1 Assessment is based on OBLIGATION of funds, NOT on EXPENDITURE AND/OR DRAWDOWN of funds because some grantees may choose to use their own or other sponsor’s funds temporarily, delay drawing down funds until all book keeping is validated, audited, etc. Therefore, the FSR is the only source of information used to assess this criterion. Payment management system reports, including SF 272s, are not used for this criterion.
- 2 All financial reporting on FSRs is cumulative to-date for the “period covered by this report” shown in block 9 on the SF 269A.
- 3 The “total federal funds authorized for this funding period,” line 10h on SF 269A, only includes federal funds awarded and available for the period covered by a financial report. Amounts awarded in advance to fund an upcoming budget period beyond the period covered by a report are not included in the reported amounts.

3 User Instructions
B A “Yes,” “No” or “N/A” response is required for this criterion. A “Yes” response is an indication that the factor is present.

“Yes” response – required when any one of these factors are met:

With respect to levels of unobligated federal funds^{1 2 3} –

(a) After one year or more of grant program activity under the current grant, the grantee/sponsor has not obligated at least 50% of the total, cumulative grant funding.

Calculation: (amount obligated ÷ amount awarded) × 100 = % of funds obligated

(b) After 24 months or more (two award cycles under one grant) of grant program activity under the current grant, the grantee/sponsor has not obligated¹ at least 75% of the total, cumulative grant funding.

Calculation: (amount obligated ÷ amount awarded) × 100 = % of funds obligated

With respect to levels of unexpended federal funds –

(c) After one year or more of grant program activity under the current grant, the grantee/sponsor’s rate of expending funds (paying obligations) is less than 50% of the amount of funds obligated.

Calculation: amount obligated ÷ 2 = threshold
If amount expended to date < threshold, the factor is “yes”

With respect to rates of obligations of federal funds –

(d) The factor specified in the table below is met for the FSR applicable at the time of assessment (last FSR received):

FSR - SF 269A Cumulative Reporting Period	Rate of Obligation (Indicates Potential Risk of Running Out of Funding During Budget Period)
FSR @ 6 Months	>75% of cumulative year 1 funding is reported as obligated
FSR @ 12 Months	>100% of cumulative year 1 funding is reported as obligated
FSR @ 18 Months	>90% of cumulative years 1+2 funding is reported as obligated
FSR @ 24 Months	>100% of cumulative years 1+2 funding is reported as obligated
FSR @ 30 Months	>90% of cumulative years 1+2+3 funding is reported as obligated
FSR @ 36 Months and any subsequent extended periods	>100% of cumulative years 1+2+3 funding is reported as obligated

“No” response – required when:

- (a) None of the factors described above are met.
- (b) The grant was recently awarded and the due date for the first Financial Status Report has not been reached.

“N/A” response – required when:

- (a) The project is a VISTA standard project that does not receive a support grant.
- (b) The award is an AmeriCorps Education Award program grant.

Corporation for National and Community Service	Page: 22
Corporation-Wide Monitoring Planning Assessment Criterion: OBLIGATIONS AND EXPENDITURES	Revision: 06/25/2007

4 Examples	Responses to this criterion are appropriate in instances such as:
A “Yes” response:	<p>(a) The grantee/sponsor received a \$100,000 award over one (1) year ago, but has only obligated \$20,000 after one year (20%). This does not meet the 50% threshold.</p> <p>$[(\\$20,000 \div \\$100,000) \times 100 = 20 \%$]</p> <p>(b) The grantee/sponsor received \$200,000 (e.g., two \$100,000 awards under one grant), and after 24 months has obligated \$150,000 (75%) of the federal grant funds, but expended (paid out) only \$50,000 (25%). The threshold falls below the minimum of \$75,000 or 50% of obligations paid.</p> <p>$[\\$150,000 \div 2 = \\$75,000$ (50% threshold); since \$50,000 (amount expended) is less than \$75,000 (threshold), the criterion factor exists]</p>
5 Source Documentation (Where to Look)	The source documentation which supports the determination of “Yes” for this criterion are:
<p>Financial Status Report.³ Obtain the cumulative amount of award, obligations and expenditures as follows:</p> <ul style="list-style-type: none"> i. Total federal funds awarded is found at SF-269A line 10h, column III (Total Federal funds authorized for this funding period) ii. Total federal funds obligated is found at SF-269A line 10g, column III (Total Federal share (sum of lines c and f)) iii. Total federal funds expended is found at SF-269A line 10c, column III (Federal share of outlays) 	
6 Required Comments	Comments are required in the assessment record as follows:
“Yes” determination:	Comments must identify the percentage of underused (unexpended or unobligated) grant funds and the amounts used to calculate the percentages.
“No” determination:	<i>[Not required]</i>
“N/A” determination:	<i>[Not required]</i>

Corporation-Wide Monitoring Planning Assessment Criterion: GRANTEE MATCH
--

Responsible Lead: Grants Officer	Assessment Category: Financial	Revision: 06/25/2007
--	--	--------------------------------

1 Criterion Summary Statement

This criterion is designed to recognize vulnerability generated when patterns indicate unusually low rates of providing non-federal funds. It is also designed to recognize vulnerability when information indicates a major future reduction in fundamental financial solvency of the grantee organization.

2 Terms and Definitions	Terminology unique to this criterion are:
--------------------------------	---

Financial Status Report (FSR) Short Form or SF 269A: OMB government-wide form used by the recipient to report expenditures over a designated period of time. The Corporation does not currently use the SF 269 long form version.

Required Match: The legislated amount of funds (cash or in-kind) that a recipient is required to provide in support of the federal grant.

Budgeted Match: The total amount of cash or in-kind the recipient committed, within the application, to provide in support of the federal grant.

3 User Instructions	A “Yes,” “No” or “N/A” response is required for this criterion. A “Yes” response is an indication that the factor is present.
----------------------------	---

“Yes” response – required when any one of these factors are met:

- (a) Through the course of daily business, the Grants Officer is aware of major funding sources, other than CNCS, that have withdrawn prior funding commitments or indicated intent to withdraw.
- (b) The factors specified in the table below are met for the FSR applicable at the time of the assessment (last FSR received):

Financial Status Report - SF 269A Cumulative Reporting Period	Level of Match Achieved (Cumulative) Indicates Potential Risk of Under-matching	
	Overall	AmeriCorps Sectional – minimum match percentages for Sections I & III and Section II
FSR @ 9 Months (Quarterly FSRs only)	<35% of required matching reported for 9 months of cumulative funding	N/A
FSR @ 12 Months	<50% of required matching reported for year 1 cumulative funding	16.5% 7.5%
FSR @ 18 Months	<60% of required matching reported for cumulative year 1 + year 2 funding	19.8% 9%
FSR @ 24 Months	<70% of required matching reported for cumulative year 1 + year 2 funding	23.1% 10.5%
FSR @ 30 Months	<80% of required matching reported for cumulative years 1 + 2 + 3 funding	26.4% 12%
FSR @ 36 Months and any subsequent extended periods	<90% of required matching reported for cumulative years 1 + 2 + 3 funding	29.7% 13.5%

Corporation for National and Community Service	Page: 24
Corporation-Wide Monitoring Planning Assessment Criterion: GRANTEE MATCH	Revision: 06/25/2007

“ No ” response – required when:	(a) None of the factors described above are met. (b) The grant was recently awarded and the due date for the first Financial Status Report has not been reached.
“ N/A ” response – required when:	(a) The project is a VISTA standard project that does not receive a support grant. (b) The award is an AmeriCorps Education Award program grant.
4 Examples	Responses to this criterion are appropriate in instances such as:
A “ Yes ” response:	(a) After 12 months, the grantee reported 45% overall match. (b) After 24 months, an AmeriCorps grantee reported 22% for Sections I and III and 15% for Section II match.
5 Source Documentation (Where to Look)	The source documentation which supports the determination of “ Yes ” for this criterion are:
	<p>Current budget(s) or award(s).</p> <p>Most recent Financial Status Report (SF 269A).</p> <p>Course of daily business for knowledge of “yes” factor regarding concerns with major funding sources.</p>
6 Required Comments	Comments are required in the assessment record as follows:
“ Yes ” determination:	Briefly identify the factor(s) the recipient has met.
“ No ” determination:	<i>[Not required]</i>
“ N/A ” determination:	<i>[Not required]</i>

Corporation-Wide Monitoring Planning Assessment Criterion: INCOMPLETE OR LATE FINANCIAL STATUS REPORTS
--

Responsible Lead: Grants Officer	Assessment Category: Compliance	Revision: 06/25/2007
--	---	--------------------------------

1 Criterion Summary Statement

The Financial Status Report is the primary vehicle through which recipients/sponsors document and CNCS grant managers review recipient expenditure levels and percentages of matching funds. The Corporation’s expectations of Financial Status Report submissions by recipients are such that:

- Sufficient details are included to track expenditures and levels of match funds from report to report;
- A determination can be made as to whether there is a problem with the rate at which the recipient draws down funds;
- All required fields are completed and are completed accurately; and
- The report is submitted by the established due date, or by an extended due date established in advance of the original due date.

2 Terms and Definitions	Terminology unique to this criterion are:
--------------------------------	---

[None]

3 User Instructions	A “Yes,” “No” or “N/A” response is required for this criterion. A “Yes” response is an indication that the factor is present.
----------------------------	---

“ Yes ” response – required when any one of these factors are met:	<ul style="list-style-type: none"> (a) The Financial Status Report does not contain all required information. (b) The Financial Status Report reflects inaccurate reporting data. (c) The Financial Status Report was not submitted by the established due date.
---	---

“ No ” response – required when:	None of the factors described above are met.
---	--

“ N/A ” response – required when:	<ul style="list-style-type: none"> (a) The project is a VISTA standard project that does not receive a support grant. (b) The award is an AmeriCorps Education Award program grant.
--	---

4 Examples	Responses to this criterion are appropriate in instances such as:
-------------------	---

A “ Yes ” response:	<ul style="list-style-type: none"> (a) The Financial Status Report was received by the specified due date, but required content was omitted from the submission. (b) The Financial Status Report was completed, but not all information was correct. (c) The Financial Status Report was due June 30 but was not submitted until July 1.
----------------------------	---

5 Source Documentation (Where to Look)	The source documentation which supports the determination of “ <u>Yes</u> ” for this criterion are:
	<p>A review or assessment of the most recent submission of the Financial Status Report.</p> <p>A comparison in eGrants of the established due date (original or extended) to the actual date of submission.</p>
6 Required Comments	Comments are required in the assessment record as follows:
“ <u>Yes</u> ” determination:	<i>[Not required]</i>
“ <u>No</u> ” determination:	<i>[Not required]</i>
“ <u>N/A</u> ” determination:	<i>[Not required]</i>

Corporation-Wide Monitoring Planning Assessment Criterion:

OPEN AUDIT FINDINGS

Responsible Lead:

Grants Officer

Assessment Category:

Compliance

Revision:

06/25/2007**1 Criterion Summary Statement**

This criterion is designed to account for open, unresolved audit findings (financial and/or programmatic) present for a particular recipient. Two types of audits are examined: 1) OMB Circular A-133 single audits, which are performed pursuant to the Single Audit Act of 1984 (P.L., 98-502), as amended by the Single Audit Act Amendments of 1996 (P.L.104-156); and, 2) audits performed by the CNCS Office of Inspector General. Audit findings which lead to a "yes" determination under this criterion are those which are either identified against the specific CNCS grant being assessed, or are identified against the organization and/or a non-CNCS grant but are of such significance that the integrity of CNCS-funded activities are placed at risk.

2 Terms and Definitions Terminology unique to this criterion are:

Audit: For the purposes of this criterion, an audit that was completed no more than three (3) years prior to the date of the assessment.

Audit Finding: Deficiencies which the auditor is required to report in the summary of findings and schedule of questioned costs.

Compliance Finding: A finding which reflects that the auditee has not complied with laws, regulations, and the provisions of contracts or grant agreements that may have a direct and material effect on each of its major programs.

Disclaimed Opinion: A disclaimer of opinion which states that the auditor does not express an opinion, compared to an adverse statement which lists one or more material weaknesses.

Illegal Acts: Civil or criminal noncompliance in which the requirement not followed or the prohibition violated is a statute or regulation.

Material Weakness: A reportable condition in an audit report resulting from the auditor's professional judgment that a high degree of risk exists with respect to the financial or operational issue that was audited.

Questioned Cost: An expenditure charged to a grant that is questioned by the auditor because of an audit finding.

Reportable Condition: One or more control deficiencies that in the auditor's judgment represent significant deficiencies in the design or operation of internal control that could adversely affect the organization's ability to meet its internal control objectives. Also, any matter coming to the auditor's attention that, in his or her judgment, should be communicated because it represents a significant deficiency in the design or operation of internal control which could adversely affect the organization's ability to record, process, summarize, and report financial data. (Note: Over the course of this next year, Reportable Condition will be eliminated and replaced with Significant Deficiency.)

Single Audit (a/k/a, "A-133 Audit"): An audit of a non-federal entity performed by an external party examining both the entity's financial statements and federal awards. Required under OMB Circular A-133 for non-federal entities expending \$500,000 or more in federal funds annually.

3 User Instructions	A “Yes” or “No” response is required for this criterion. A “Yes” response is an indication that the factor is present.
<p>“Yes” response – required when any one of these factors are met:</p>	<p><i>Open, unresolved audit findings exist for any one of the following:</i></p> <ul style="list-style-type: none"> (a) Any audit reports allegations of illegal acts related to any activity under any grant or non-grant operations of the recipient. (b) A Single Audit identifies one or more material weakness(s) related to the organization’s non-CNCS programs and grants regarding matters and/or activities likely to exist under CNCS programs or grants (e.g., time and attendance, procurement practices). (c) A Single Audit identifies one or more compliance findings of any nature, rising from the examination of CNCS programs and/or grants. (d) Any audit reports a lack of monitoring of subgrantees by the parent organization. (e) Questioned costs for a CNCS award(s) are greater than 10% of the award. <p><i>The Grants Officer is aware of one or both of the following as identified either through an audit or through the course of daily business:</i></p> <ul style="list-style-type: none"> (f) A bankruptcy filing has been made or intent to file announced. (g) Another federal or state agency has notified CNCS regarding a weakening of the organization’s financial solvency or inappropriate use of non-CNCS funds.
<p>“No” response – required when:</p>	<p>None of the factors described above are met or an audit has not been performed during the previous three years.</p>
<p>[“<i>N/A</i>” response]</p>	<p>[<i>Not a selection option for this criterion.</i>]</p>
4 Examples	Responses to this criterion are appropriate in instances such as:
<p>A “Yes” response:</p>	<ul style="list-style-type: none"> (a) The audit questions more than 10% of the funds expended by the recipient. (b) The recipient has found to be in non-compliance with CNCS rules and/or procedures.

5 Source Documentation (Where to Look)	The source documentation which supports the determination of “ <u>Yes</u> ” for this criterion are:
	<p>Single Audit (A-133 Audit).</p> <p>CNCS OIG Audit.</p> <p>eGrants – Audit Module; Grants Officer Certification Screen.</p>
6 Required Comments	Comments are required in the assessment record as follows:
“ <u>Yes</u> ” determination:	Briefly indicate which factor(s) the recipient has met.
“ <u>No</u> ” determination:	<i>[Not required]</i>

Corporation-Wide Monitoring Planning Assessment Criterion: RECIPIENT RESPONSIVENESS

Responsible Lead: Program Officer [Grants Officer]	Assessment Category: Compliance	Revision: 06/25/2007
--	---	--------------------------------

Special Criterion Instruction

For this criterion, the Grants Officer also provides relevant information that contributes to a “Yes” determination as defined below. The Grants Officer provides this documentation by entering applicable information in the criterion “Comments” field of the assessment record prior to completing the GO Submission for the assessment record. The Program Officer then reviews that information in making the final determination for this criterion, being certain to account for information that contributes to a “Yes” determination.

1 Criterion Summary Statement

This criterion is designed to recognize when a recipient, based on the factors described below, has been unsuccessful in addressing issues raised by the Corporation as needing correction or action.

2 Terms and Definitions	Terminology unique to this criterion are:
--------------------------------	---

Pattern: A total of three or more occurrences of non-responsiveness within the last 12 months.

Documented: The action taken by an agent of the Corporation that records the non-responsiveness of the grantee in an official record or communiqué.

3 User Instructions	A “Yes” or “No” response is required for this criterion. A “Yes” response is an indication that the factor is present.
----------------------------	--

<p>“Yes” response – required when any one of these factors are met:</p>	<p>During the period of assessment, the recipient:</p> <ul style="list-style-type: none"> (a) Demonstrated a pattern of failures to meet deadlines or delinquency in reporting (including, but not limited to, progress reports, financial status reports, unexpended funds forms, close-out documents, no-cost extension requests at least 30 days prior to grant expiration dates (for multiple grants)); (b) Disregarded instructions by the Corporation and did not perform a corrective action as required; (c) Did not acknowledge, as required, a direct official notification or mandate by the Corporation; or, (d) Did not participate in a mandatory training or technical assistance event as required by the Corporation.
--	--

<p>“No” response – required when:</p>	<p>None of the factors described above are met.</p>
--	---

<p>[“N/A” response]</p>	<p>[Not a selection option for this criterion.]</p>
-------------------------	---

4 Examples	Responses to this criterion are appropriate in instances such as:
A “Yes” response:	<ul style="list-style-type: none"> (a) Submission records show that a grantee has an established pattern for submitting Progress Reports and/or Financial Status Reports and/or close-out documents after the posted deadlines and without authorized deadline extensions and/or a pattern of extension requests. (b) Continuation grant negotiations are protracted due to grantee non-responsiveness resulting in a slip of the award date. (c) The grantee does not respond to an official request by the Corporation. (d) Corrective actions requested by the Corporation are not carried out.
5 Source Documentation (Where to Look)	The source documentation which supports the determination of “Yes” for this criterion are:
	<p>Submission dates generated by CNCS reporting systems (i.e., eGrants, WBRs).</p> <p>Corporation comments in staff review, comments, and certification screens.</p> <p>Contents of grantee report submissions, as are applicable.</p> <p>Correspondence - monitoring feedback/follow up letters; close-out letters.</p>
6 Required Comments	Comments are required in the assessment record as follows:
“Yes” determination:	Brief comments must be sufficient to identify the general area(s) of concern.
“No” determination:	<i>[Not required]</i>

Corporation-Wide Monitoring Planning Assessment Criterion: INCOMPLETE OR LATE PROGRESS REPORTS
--

Responsible Lead: Program Officer	Assessment Category: Compliance	Revision: 06/25/2007
---	---	--------------------------------

1 Criterion Summary Statement

The Progress Report is the primary vehicle through which recipients/sponsors document and CNCS program managers review:

- Program activities
- Accomplishments and outcomes achieved
- Success stories
- Challenges
- Training and Technical Assistance requests

The Corporation’s expectations of Progress Report submissions by recipients are such that:

- Sufficient details are included to enable the report to serve as a record of progress toward meeting the objectives of the grant/program and are relevant to the purpose of the award;
- All required fields are completed and are completed accurately; and
- The report is submitted by the established due date, or by an extended due date established in advance of the original due date.

2 Terms and Definitions	Terminology unique to this criterion are:
--------------------------------	---

[None]

3 User Instructions	A “Yes” or “No” response is required for this criterion. A “Yes” response is an indication that the factor is present.
----------------------------	--

“Yes” response – required when any one of these factors are met:	(a) The Progress Report cannot stand alone as a record of progress, activities, and achievements. (b) The Progress Report does not contain all required information. (c) The Progress Report was not submitted by the established due date.
---	---

“No” response – required when:	None of the factors described above are met.
---------------------------------------	--

<i>[“N/A” response]</i>	<i>[Not a selection option for this criterion.]</i>
-------------------------	---

4 Examples	Responses to this criterion are appropriate in instances such as:
A “ <u>Yes</u> ” response:	<ul style="list-style-type: none"> (a) The Progress Report was received by the specified due date, but the recipient’s reporting of progress toward meeting the goals of the work plans was not updated. (b) The Progress Report was received by the specified due date, but required content was omitted from the submission. (c) The Progress Report was due June 30 but was not submitted until July 1.
5 Source Documentation (Where to Look)	The source documentation which supports the determination of “ <u>Yes</u> ” for this criterion are:
	<p>A review or assessment of the most recent submission of the Program Progress Report.</p> <p>A comparison in eGrants/WBRS of the established due date to the actual date of submission.</p>
6 Required Comments	Comments are required in the assessment record as follows:
“ <u>Yes</u> ” determination:	<i>[Not required]</i>
“ <u>No</u> ” determination:	<i>[Not required]</i>

Corporation-Wide Monitoring Planning Assessment Criterion: OLDT ONLY: ONE OR MORE PARTNERS OR SUBCONTRACTORS
--

Responsible Lead: Program Officer	Assessment Category: Program Specific	Revision: 06/25/2007
---	---	--------------------------------

1 Criterion Summary Statement

This criterion applies to national training and technical assistance providers that (a) operate in a partnership to provide training and technical assistance services in a single cooperative agreement, or (b) subcontract to one or more organizations for the provision of those services. Vulnerability is associated with a higher number of partners and/or subcontractors. In determining vulnerability, it is important to consider both the compliance and quality of services of partners and subcontractors.

2 Terms and Definitions	Terminology unique to this criterion are:
--------------------------------	---

[None]

3 User Instructions	A “Yes,” “No” or “N/A” response is required for this criterion. A “Yes” response is an indication that the factor is present.
----------------------------	---

“Yes” response – required when any one of these factors are met:	(a) A national training and technical assistance provider consists of two or more partners carrying out the cooperative agreement. (b) A provider has one or more subcontracts with other entities to carry out substantial activities under this agreement.
---	---

“No” response – required when:	None of the factors described above are met.
---------------------------------------	--

“N/A” response – required when:	The T/TA project is not administered within OLDT.
--	---

4 Examples	Responses to this criterion are appropriate in instances such as:
-------------------	---

A “Yes” response:	A cooperative agreement has one or more subcontractors or other partners on which they rely for the delivery of services.
--------------------------	---

5 Source Documentation (Where to Look)	The source documentation which supports the determination of “Yes” for this criterion are:
---	--

Cooperative Agreement.

Correspondence from the provider alerting to the use of a subcontract(s) or partner(s).

6 Required Comments	Comments are required in the assessment record as follows:
----------------------------	--

“Yes” determination:	Briefly indicate whether there is presence of a subcontract(s), partner(s), or both.
-----------------------------	--

“No” determination:	<i>[Not required]</i>
----------------------------	-----------------------

“N/A” determination:	<i>[Not required]</i>
-----------------------------	-----------------------

Corporation for National and Community Service	Page: 35
Corporation-Wide Monitoring Planning and Assessments: GLOSSARY	Revision: 06/25/2007

The glossary contains an alphabetical list of all terms and definitions contained in the Process Guide and Assessment Criteria Descriptions.

Assistance Activity: A federal grant, cooperative agreement, sponsored program - anything of value (e.g., funds, people, equipment) transferred from the Corporation to a non-federal recipient (excludes contracts).

Active Grant: For the purposes of the assessment process, “active grant” is any award for which July 1 is within the project period start and end dates.

Audit: For the purposes of this criterion, an audit that was completed no more than three (3) years prior to the date of the assessment.

Audit Finding: Deficiencies which the auditor is required to report in the summary of findings and schedule of questioned costs.

Award Oversight and Monitoring Coordinating Council (Council): Established in Fiscal Year (FY) 2005, the Council’s mission is to ensure the Corporation exercises uniformly excellent financial, administrative, and programmatic award oversight across its programs and supports awardee success through effective compliance monitoring and training and technical assistance. Principal Council members include: Chief Operating Officer; Chief Financial Officer; General Counsel; Program Office Directors; Deputy Chief Financial Officers; Chief Information Officer; and, Award Oversight & Monitoring Director.

Compliance Finding (Audits): A finding which reflects that the auditee has not complied with laws, regulations, and the provisions of contracts or grant agreements that may have a direct and material effect on each of its major programs.

Component Project (Senior Corps only): A decentralized local project that operates with a main office and one or more satellite or “component” offices funded by Corporation or non-Corporation sources. To qualify, the project’s component office(s) is staffed by a coordinator or coordinators with management oversight responsibility for at least 10 Volunteer Service Years (VSYs) or 50 budgeted RSVP volunteers. Component projects generally do not have their own grant numbers in eGrants; rather, components are attached to the primary grant number.

Disclaimed Opinion (Audits): A disclaimer of opinion which states that the auditor does not express an opinion, compared to an adverse statement which lists one or more material weaknesses.

Documented (Recipient Responsiveness): The action taken by an agent of the Corporation that records the non-responsiveness of the grantee in an official record or communiqué.

Drawdown Funds: The process a grantee/sponsor uses to request and receive grant funds into their account from the U.S. Treasury. The grants office monitors the current amount drawdown by accessing the HHS Payment Management System. Typically, funds are drawdown electronically and should be drawdown only when needed to pay bills, invoices, and payroll expenses.

Financial Status Report (FSR) Short Form or SF 269A: OMB government-wide form used by the recipient to report expenditures over a designated period of time. The Corporation does not currently use the SF 269 long form version.

Corporation for National and Community Service	Page: 36
Corporation-Wide Monitoring Planning and Assessments: GLOSSARY	Revision: 06/25/2007

Fiscal Agent: The organization or agency that is responsible for the fiscal management of a CNCS funded program, but is not necessarily responsible for the programmatic management of the same program. For instance, this applies to State Commissions when a state agency is responsible for the management of their funds while the Commission is responsible for the programmatic management of their subgrantees.

Expenditures / Expend Funds: Grant funds are obligated once a grantee/sponsor has established a legally binding agreement for the use of grant funds. As goods and services are received and accepted by the grantee/sponsor for the obligations made, grant funds are *expended* as the bills and invoices are paid for those obligations.

Grant: For the purposes of this document and the assessment process, the term “grant” refers to any type of federal assistance activity (e.g., grant, cooperative agreement, sponsored program).

Illegal Acts: Civil or criminal noncompliance in which the requirement not followed or the prohibition violated is a statute or regulation.

Innovative / Untested Program Design: A strategy or service activity for which there is no relevant experience that would predict success.

Intermediary Organization: An organization that serves as a direct recipient of Corporation resources and then subgrants or suballocates those resources into the community. Examples: A State Commission acts as an intermediary organization that allocates CNCS funds to subgrantees within the state. An AmeriCorps*Direct grantee acts as an intermediary organization that subgrants CNCS funds to operating sites in two or more states.

Key Staff: Staff directly responsible for the programmatic or fiscal operation and/or management of the grant or project. For VISTA, “Key Staff” also refers to staff who supervise a VISTA.

Legal Applicant: The organization that is legally responsible for the programmatic and/or fiscal management of CNCS funded programs.

“Major” (Major Changes in Project Design/Scope): Increases, decreases, or changes in the above elements that raise questions about the organization’s ability or capacity to achieve its stated performance measures.

Match - Budgeted: The total amount of cash or in-kind the recipient committed, within the application, to provide in support of the federal grant.

Match - Required: The legislated amount of funds (cash or in-kind) that a recipient is required to provide in support of the federal grant.

Material Weakness (Audits): A reportable condition in an audit report resulting from the auditor’s professional judgment that a high degree of risk exists with respect to the financial or operational issue that was audited.

Member Service Year (MSY): Budgeting unit of measure used by CNCS programs (i.e., AmeriCorps*State/National, AmeriCorps*VISTA).

New CNCS Recipient: An organization that has not directly received a grant from the Corporation within the last six years (to the extent organizational history is available in eGrants) and is in its first year of its grant from the Corporation. (Continuation/renewal years do not constitute a new CNCS recipient under this criterion.)

Corporation for National and Community Service	Page: 37
Corporation-Wide Monitoring Planning and Assessments: GLOSSARY	Revision: 06/25/2007

New / Non-Typical Partnership: A partnership, critical to the success of the program, which comprises organizations with little or no experience with operational collaboration or is atypical in nature.

Pattern (Recipient Responsiveness): A total of three or more occurrences of non-responsiveness within the last 12 months.

Obligations / Obligate Funds: After an award is made, federal assistance under that award is obligated when the grantee/sponsor establishes a legally binding agreement to pay for goods or services from which there is a penalty for failing to honor the agreement. The amount obligated is reported to the grants office, typically on semi-annual cycles, but may be reported annually or quarterly. Obligations are typically established by employee payroll time and attendance systems, contracts, agreements, and purchase orders issued by the grantee.

Operating Site: A local organization that implements grant activities at a local level.

Participant Enrollment: Refers to the enrollment of participants in a CNCS funded grant program. This does not include community volunteers who are mobilized by participants.

Participant Position: The number of positions that support/fill the Volunteer Service Year (VSY – e.g., Senior Corps’ Foster Grandparent and Senior Companion Programs) or Member Service Year (MSY – AmeriCorps*State/National) allotment of a grant award.

Participant Retention: Refers to the ability of a CNCS funded grant program to retain the participants that it enrolls.

Planned Monitoring Activity: The type of monitoring activity (e.g., on-site compliance visit, desk review, training/technical assistance) planned for a grant for the upcoming fiscal year.

Potential Vulnerability: Factors present in grants administration most indicative of vulnerabilities related to performance, financial weakness, or non-compliance.

Priority Level: The level of priority assigned to each grant for monitoring planning purposes as determined through the assessment process. The level reflects the degree of potential vulnerability determined for each assistance activity in accordance with the assessment criteria descriptions. Priority levels are defined as “High,” “Medium,” or “Low.”

Program / Project: For the purposes of this document and the assessment process, the terms “program” and “project” are interchangeable and refer to the full scope of activities designed by the grant recipient in its application for federal assistance and support provided by the Corporation.

Questioned Cost (Audits): An expenditure charged to a grant that is questioned by the auditor because of an audit finding.

Recent Change (Staffing Changes): A change in staff within the last six (6) months.

Recipient: A grantee or sponsor – any entity or individual that receives a grant from the Corporation.

Corporation for National and Community Service	Page: 38
Corporation-Wide Monitoring Planning and Assessments: GLOSSARY	Revision: 06/25/2007

Reportable Condition: One or more control deficiencies that in the auditor’s judgment represent significant deficiencies in the design or operation of internal control that could adversely affect the organization's ability to meet its internal control objectives. Also, any matter coming to the auditor’s attention that, in his or her judgment, should be communicated because it represents a significant deficiency in the design or operation of internal control which could adversely affect the organization’s ability to record, process, summarize, and report financial data. *(Note: Over the course of this next year, Reportable Condition will be eliminated and replaced with Significant Deficiency.)*

Single Audit (a/k/a, “A-133 Audit”): An audit of a non-federal entity performed by an external party examining both the entity’s financial statements and federal awards. This is required under OMB Circular A-133 for non-federal entities expending \$500,000 or more in federal funds annually.

Subrecipient / Subgrantee: An organization that receives CNCS grant funds from a CNCS grantee and not directly from the Corporation. (Similarly, a sub-subgrantee receives grant funds from a CNCS subgrantee.)

Volunteer Service Year (VSY): Budgeting unit of measure used by CNCS programs (e.g., for the Senior Corps’ Foster Grandparent and Senior Companion Programs, one VSY equals 1,044 hours).